

# **REGIONAL TRANSPORTATION PLAN**

# Appendix F Public Comment Report



March 2014 Update

# Appendix F Public Comment Report

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# **Background for Public Comment**

# **Overview**

In its role as the Metropolitan Planning Organization for the metropolitan Atlanta Region, ARC has a distinct responsibility to provide the public with transportation planning information throughout any transportation planning process. This information should be shared early and often, and be presented in a manner that is clear and understandable. This report endeavors to document how that was accomplished for the PLAN 2040 Regional Transportation Plan (RTP), as updated in March 2014, its associated Transportation Improvement Program for FY 2014–2019 and the Conformity Determination Report. All of this is being integrated with the Georgia Department of Community Affairs (DCA) required Regional Agenda and coordinated with the Area Agency on Aging programs.

This report is divided into four primary sections:

- Policy background that governs the public outreach activities at ARC
- Discussion of the outreach process that encouraged public input with accounting of the results of this
  process
- Section on the public comments received during the official public review and comment period along with ARC and planning partner responses
- Exhibits section with examples of outreach formats used in the process

# **Federal Guidance**

The public participation process is guided by federal regulation for the Federal Highway Administration: 23 CFR Part 450.316: Interested parties, participation, and consultation as well as the Federal Transit Administration regulation: 49 CFR Part 613.300:

- Provide adequate public notice of public participation activities and time for public review and comment at key decision points, including but not limited to a reasonable opportunity to comment on the proposed metropolitan transportation plan and the TIP;
- Provide timely notice and reasonable access to information about transportation issues and processes;
- Employ visualization techniques to describe metropolitan transportation plans and TIPs.
- Make public information (technical information and meeting notices) available in electronically accessible formats and means, such as the World Wide Web;
- Hold any public meetings at convenient and accessible locations and times;
- Demonstrate explicit consideration and response to public input received during the development of the metropolitan transportation plan and the TIP;

- Seek out and consider the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households, who may face challenges accessing employment and other services;
- Provide an additional opportunity for public comment, if the final metropolitan transportation plan
  or TIP differs significantly from the version that was initially made available for public comment;
  and
- When significant written and oral comments are received on the draft metropolitan transportation
  plan and TIP (including financial plans) as a result of the participation process or the interagency
  consultation process required under EPA transportation conformity regulations (40 CFR Part 93), a
  summary, analysis, and report on the disposition of comments shall be made as part of the final
  metropolitan transportation plan and TIP.

# **Atlanta Regional Commission Guidelines**

ARC's purpose is to serve the citizens of the Atlanta region, local governments and the broader regional community by providing services, support and leadership on issues that cross jurisdictional lines and require comprehensive regional solutions. Its vision is to be a regional leader in identifying values, developing policies and executing plans that matter to residents and communities, that ensure competitive advantage and that preserve long term sustainability and livability. Its mission is to demonstrate professional and forward-looking leadership to ensure sustainable growth, livability and competitive advantage by focusing and balancing environmental responsibility, economic growth and social needs.

# **ARC Values**

ARC adopted an internal strategic plan in 2011 to ensure focus and concerted effort towards achieving critical, regional objectives. The following three tenets – derived from ARC's organizational values that illustrate its culture, beliefs, and characteristics – are

integral to the community engagement process:

<u>Creative Regional Solutions:</u> We anticipate challenges and develop creative solutions based on professional knowledge, public involvement and collaboration with our partners.

<u>Public Service:</u> We are accountable to our stakeholders, try to exceed their expectations and exhibit the highest standard of ethical conduct.

<u>Collaborative Teamwork:</u> We work with each other,

RESULTS/
ACCESS VALUE RESULTS... LISTENING/
DIALOGUE

FEEDBACK

with partners and with residents of the region in a concerted effort to build the highest quality of life for the metropolitan region. To provide an engagement process that facilitates identification of community values, development of policies and implementation of plans that matter to residents and communities, ensuring competitive advantage and preserving long term sustainability.

## <u>Community Engagement - Transportation Participation Goals</u>

ARC's Transportation Access and Mobility Division is provided guidance through the Regional Community Engagement Plan, adopted August 2011 by the ARC Board. The goals of the plan are as follows:

- Enhance the impact of participation on transportation decision-making. To accomplish this goal,
   ARC strives to:
  - o Increase the number of people participating in the process.
  - o Increase the number of opportunities to participate.
  - o Increase the understanding of transportation planning
  - O Evaluate the effectiveness of participation processes.
- Increase the coordination of participation activities between ARC, local jurisdictions and transportation agencies in the Atlanta Region to more effectively provide outreach mechanisms for:
  - Sharing activities and results
  - o Implementing shared agendas
  - o Communicating coordination results.

The following components of community engagement are identified in this plan and are employed for Regional Transportation Planning Process. As much as possible, engagement occurs continuously, not just around a planning process. In this way, relationships are built over time and knowledge is current and useful to all concerned. These components do not represent all of the possibilities for outreach and discussion – only the major components:

- Public dialogue about the needs in the community
- Public consideration and discussion of a proposed project
- Review and comment on a proposed project
- Public input on regional policies, goals and strategies that will determine how the project will look in the future
- Public review of a plan's technical framework during its development
- Public review of results of plan testing for financial constraints and air quality conformity to federal and state requirements
- Public review of draft plan
- Feedback to public on how their input influenced the planning effort
- Plan presented to ARC committees for consideration and adoption with public comment period
- Formal public hearing on major plan changes
- Plan is adopted by governmental agencies and projects within the plan are then available for funding

Implementation of procedures related to these guidelines for ARC's planning and participation processes in accordance with policies, include:

- Public notice of review and comment period through a legal organ, the ARC website, media advisories and extensive mailing lists;
- Reasonable opportunity for review and comment inclusive of a 30-day review and comment period;
- Comment documentation and distribution to policy makers and the general public;
- Opportunities for citizens to participate through focus groups, listening sessions, task forces and planning teams;
- A formal ARC committee structure for approvals and recommendations: Transportation Coordinating Committee, Transportation and Air Quality Committee and ARC Board;
- Opportunities for oral and written comment by email, survey responses, fax, phone calls, regular mail, telephone conversation, public hearings or face-to-face conversations; and,
- A participation evaluation process to assess the effectiveness of public outreach activities.

Supporting documents for the above may be obtained from ARC's website, www.atlantaregional.com

# PLAN 2040 Stakeholder Involvement Program

This program is ARC's plan to meeting the requirements of both DCA for the development of the Regional Agenda and US DOT for the development of the RTP. It outlines the program's constituent groups and actions, as well as participation techniques and plan development/participation schedule. It identifies the following PLAN 2040 Stakeholders:

- Policy-making elected/appointed officials from local, regional and state jurisdictions. This also
  includes interaction with federal officials who establish and review rules and regulations in the
  planning process. Public planning partner staffs, which prepare their jurisdictional plans, provide
  background information, and who advise officials are also targeted here.
- State and local private sector leadership and interested people within special interest groups that consistently engage in PLAN 2040 issues.
- Individuals or groups that participate in ARC activities based on short-term, issue-driven concerns.

# **Public Outreach Process**

# Introduction

Beginning with the earliest outreach and visioning activities in 2009, the PLAN 2040 process was comprehensive combining land use and transportation. It was guided by both federal requirements for transportation planning and state requirements for land use planning. This comprehensive approach provided a focus that was integral to how PLAN 2040 results were viewed, discussed and understood. This process, however, spread beyond the tie between land use and transportation planning. It encompassed planning for several services as well: senior services, water resource planning, employment services planning and health assessment planning. This process consequentially extended to a larger stakeholder representation and expanded the interested parties to the process.

In addition, the PLAN 2040 process was bookended by two major regional efforts: the visioning effort knows as Atlanta Fifty Forward and the regional sales tax referendum, Transportation Investment Act of 2010 (TIA). These community outreach efforts supplemented the development of PLAN 2040.

Since the adoption of the PLAN 2040 RTP in 2011, outreach continued to build upon previous efforts to inform this iteration of the PLAN 2040



RTP (March 2014 Update). The public involvement activities conducted by ARC and the Regional Roundtable for the TIA outreach was the largest ever conducted by the agency. It employed many new innovative techniques and reached an audience of 120,000. The public feedback collected during this process which related to specific transportation projects as well as community needs and preferences, have been incorporated into the RTP. Other outreach activities related directly to this RTP development are also noted below.

# **Outreach Summary and Milestones**

Transportation outreach and planning is a continuous and constant process. Major outreach activities conducted for development of PLAN 2040 from 2008-2011 were integral to the further outreach and development of the PLAN 2040 RTP (March 2014 Update).

Outreach activities are ones that achieve the following goals for PLAN 2040 development: Setting the Framework, Identifying the Issues, Identifying Goal, Objectives, Polices and Guidelines and Sharing Recommendations. Key activities are highlighted below. Further detail of the earliest outreach that helped

develop the vision for PLAN 2040 is available in Appendix F of the PLAN 2040 Documentation approved July 2011, available at www.atlantaregional.com/plan2040.

Since the original adoption of PLAN 2040 in July 2011, the Atlanta Regional Commission has completed several activities that support and enhance public involvement, including efforts related directly to the development of the March 2014 RTP Update such as:

- *Title VI Plan & Program* update adopted August 2013 and approved by FTA in September 2013.
- DBE Program & Plan update developed concurrently with the Title VI Plan update, completed and uploaded to the FTA TEAM system in September and currently pending FTA approval.
- Regional Community Engagement Plan adopted August 2012
- Limited English Proficiency Plan adopted in August 2012

Also, in mid-2011, ARC adopted a new 5-year Strategic Plan that refreshed the purpose, vision and mission of the 66 year-old organization and revisited values. In December 2012, ARC adopted a new staff evolution plan to support realization of the Strategic Plan. The staff plan is a change in mindset and culture to help ARC meet the current and future needs of the Atlanta region. From the four former departments, the organization is shifting to three centers – Community Services, Livable Communities and Strategic Relationships. The three centers will work in a cross-function style and focus on helping to drive change, not just planning for change. With respect to transportation planning, the Community Engagement Manager in the Center for Strategic Relationships will provide support agency-wide in the areas of community engagement, environmental justice, social equity. That position was filled in November 2013 and roles and responsibilities will soon be formalized.

# **Key Outreach Milestones**

- In development of PLAN 2040, ARC conducted leadership interviews with ARC senior staff meeting with 43 metro Atlanta leaders representing local and state governments, as well as business, economic, education, environmental and social fields of endeavor.
- Local government outreach was extensive and included different areas of planning within local government with a targeted emphasis on continuous interaction with local elected officials.
- Youth outreach: This included high school and university age participants, particular through the Clark Atlanta Transportation Institute, ARC's MARC (Model ARC) leadership program, and a discussion group of students from Emory, Georgia State, Georgia Tech, Kennesaw, Morehouse and Oglethorpe campuses.
- Surveys and polls were undertaken by the Transportation and Land Use Committees, the Transportation Access & Mobility Division, online surveys and a scientific telephone poll.
- In 2013, ARC conducted the first-ever statistically-significant regional perception poll to access resident opinions throughout the region. In the future, this public perception poll will be compared to success attributes measured through the PLAN 2040 regional indicators scorecard.

- PLAN 2040 website resources were available throughout the year with retooled web presence containing multiple resources and process results developed in an ongoing manner.
- ARC and its planning partners, working with the Social Equity Advisory Committee and CEN, continues to address environmental justice requirements and equity issues in public participation plans and activities. The current participation plan was updated in 2012 and involved extensive consultation with representatives from the environmental justice communities. Public participation plans for planning studies, comprehensive transportation plans, and Livable Centers Initiatives planning activities use the updated Regional Community Engagement Plan as a document of reference.
- The Social Equity Advisory Committee works to ensure that the needs of low-income persons, minorities, the disabled, and other traditionally underserved populations in the region are considered in ARC's planning processes, programs, and initiatives. The committee is currently comprised of the following: ARC Board/citizen representatives, Georgia Stand-up, Gwinnett Coalition for Health and Human Services, DeKalb Branch of NAACP, Emory University's Office of Community Partnerships, Atlanta Urban League Young Professionals, Disability Link, Cobb County Transit Advisory Board, Douglas Connect, Latin American Chamber of Commerce of Georgia, Refugee Women's Network, Henry County NAACP, Atlanta Neighborhood Development Partnership, Georgia Division of Aging Services, Clayton County Resource Center, Latin American Association, Center for Pan-Asian Community Services, Partnership for Southern Equity, Mexican American Consulate, Coalition for the People's Agenda, Community Services Agency for Cherokee County, Office of Community Services for Morehouse College, Transit Riders Union, Spelman College, Pittsburg Community Improvement Association, Atlanta Neighborhood Development Partnership, and African-American, Asian-American, Latino, and older adult community representatives/advocates.
- ARC continues to strengthen its methodology for assessing benefits and burdens. In 2011, the Equitable Target Area (ETA) index was developed by the Atlanta Regional Commission to identify high concentrations of environmental justice (EJ) communities in the Atlanta region. The composite index utilizes five parameters: the senior population, low education attainment, housing values, poverty, and the distribution of minorities. Based on the methodology, areas that scored higher than the regional average were determined to be ETA communities, and were subsequently categorized into three levels of ETA "concentrations": medium ETA, high ETA, and very high ETA. The index aims to provide a more detailed analysis of EJ communities, in order to facilitate addressing their needs in the transportation planning process. This process was used for PLAN 2040 analysis and for the Transportation Investment Act of 2010 analysis as well as analysis related to specific transportation projects with on-going calls within the agency, such as Livable Centers Initiative program.
- In the development of PLAN 2040, ARC worked with the Civic League for Regional Atlanta and regional stakeholders to convene neighborhood forums in support of the "Fifty Forward" visioning initiative which engaged thousands of citizens in planning discussions around critical key issues. The Civic League was also a key partner in the development of ARC's pilot Pop-Up Open House in 2014, which transformed a vacant storefront in a vibrant town center to attract new participants to an information format that is accessible, innovative and interactive with opportunities to weigh in on key issues to the RTP development.

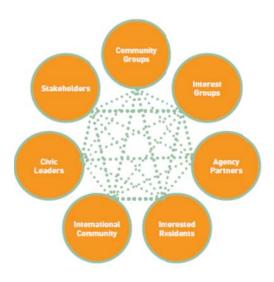
- For the Transportation Investment Act of 2010, ARC worked with the Civic League for Regional Atlanta, the Partnership for Southern Equity, and others in the social justice network to gain input through monthly community briefings. Communications efforts were very successful and included: online surveys that garnered over 10,000 responses, telephone townhalls reaching over 100,000 people, Clark Atlanta University Summer Transportation Institute and Model ARC for youth input, Civic League Get a Move On Town Hall, the Partnership for Southern Equity Moving to Opportunity forums, public referendum forums, and Executive Committee/Roundtable meetings. Community briefings were held in April and May to provide citizens with information on how the process would proceed and the content of the law. In addition, people signed up for email alerts for ongoing Roundtable activities. University of Georgia-led focus groups were conducted in each county and the City of Atlanta, and surveys were conducted by Kennesaw State University and the Roundtable reaching over 12,000 respondents by the end of July. An AARP townhall provided over 11,000 participants with up-to-date information.
- For the TIA, a website was established for the public to access information about the criteria, lists, meeting agendas/minutes, studies ongoing regarding potential projects, and results of outreach efforts. Housed on this website, ARC included three primary ways for visitors to get to know the regional projects: interactive mapping, Google Earth flyover tours, and project maps along with project fact sheets. The website also included a Frequently Asked Questions compendium, a summary guide on financial management and oversight (titled "Following the Money"), a brief "10 Facts about the Referendum" document, an infographic on how the components of the law would work upon passage of the referendum, technical reports on economic and travel impacts, and several presentations and videos explaining the analyses ARC performed.
- Throughout outreach for TIA, presentations by each of the counties were given to the ARC Board on each of their project lists and were posted to the website in addition to listing each county's local 15% lists (if made available). Modal project maps of expressway, bridge, and interchange projects, road corridors and bridge replacement projects, and transit expansion and preservation projects were also provided. The website archived all of the Roundtable meetings and results from the public involvement activities to date and can be accessed at www.metroatlantatransportationvote.com.
- ARC continues to collaborate with external partners to promote the utilization of health impact assessment and other tools and processes in regional planning activities. The Council for Quality Growth and Regional Development (CQGRD) conducted a Health Impact Assessment of PLAN 2040 to determine how the plan might affect the health of residents and communities around the region. The CQGRD conducted an online survey about the potential health impacts of PLAN 2040. It was available, in addition to other venues, on the ARC PLAN 2040 website. In August 2011, CQGRD hosted training for local governments and other sponsors on utilizations of the assessment.
- ARC has an agency-wide approach to community outreach. With respect to transportation
  planning, the Community Engagement Manager in the Center for Strategic Relationships, reporting
  to the Director's Office, provides support <u>agency-wide</u> in the areas of community engagement,
  environmental justice, social equity. That position was filled in November 2013 and roles to are
  being defined to work closely with the outreach coordinator in the Transportation Access &
  Mobility Division. Further, community outreach staff throughout the agency are similarly involved in
  their specific areas of focus.

- ARC established the Global Atlanta Initiative to enhance outreach in environmental justice
  communities. Both the Ethnic Minorities Information System and Multicultural Directory are new tools
  community partners use for planning purposes. There are 21 profiles of ethnic communities in the
  region available as a resource, including Asian American, African American, and Latino
  communities.
- ARC's Transportation Access & Mobility Division and the Aging Services Advisory Committee are working together to address mobility issues of the disabled and the elderly. ARC serves on several aging planning committees in the community that look at transportation issues. Also, as directed by the Board, ARC's Transportation Access & Mobility Division and Aging Services Division work together to incorporate the transportation needs of older adults in the transportation planning process. In 2012 ARC hosted a mobility summit focused on the needs of older adults, persons with disabilities and transportation-disadvantaged populations.
- ARC worked interdepartmentally to develop a Human Services Coordinated Transportation Plan focused on the transportation needs of persons with disabilities, older adults, and persons with low incomes and making recommendations on how to improve transportation for these groups. The Human Services Coordinated Transportation Plan, developed with extensive community engagement and stakeholder input, was updated and approved by the ARC Board in April 2010. ARC continues to expand and build on the HST work through the facilitation of monthly meetings with the HST Advisory Committee. ARC also participates in the state's Office of Highway Safety Older Driver's Task Force, MARTA's Elderly Disabled Access Advisory Committee, Cobb County Mobility Council, and other committees that address transportation issues and concerns regarding HST populations. In 2011, ARC was awarded funds under FTA's Veterans Transportation and Community Living Initiative Grant to develop a regional one-click software system in support of regional mobility management. This effort is coordinated amongst key pilot sites and stakeholders including the Department of Veterans Affairs, Goodwill of North Georgia, DisAbilty Link, Cobb County Community Transit, Agewise Connection and GA Commutes.
- ARC developed an agency-wide Limited English Proficiency (LEP) Plan to provide meaningful
  access to LEP Persons. The LEP plan includes elements that ensure that where substantial numbers
  of residents of the Atlanta region live who do not speak or read English proficiently, these LEP
  individuals have access to the planning process and published information. And, that the
  production of multilingual publications and documents and/or interpretation at meetings/events
  will be provided to the degree that funding permits. ARC completed an update to the plan in
  2012.

# **Audiences Engaged**

The following Stakeholders were engaged throughout the PLAN 2040 process:

- Local elected officials included the ARC Board, the additional eight counties of the MPO, and city mayors/county administrators not serving on the ARC Board. Also included was outreach with the Metropolitan Atlanta Mayors Association, Georgia Municipal Association and Association County Commissioners Georgia.
- Local government planners specializing in transportation, transit, land use, sustainability, the environment, water resources, historic preservation, housing, services to population groups, evacuation/hazards.



- Local planning community: consultants in architecture, community participation, city planning, professional organizations, nonprofit organizations around selected sites in region specializing in housing, development, transportation demand management associations, financing, maintenance and operations for roadways, services for community.
- Federal and State planning partners included members of the State Legislature and State
  Departments of Transportation, Community Affairs, and Natural Resources. Federal partners
  included the Federal Highway Administration, Federal Transit Administration, and the
  Environmental Protection Agency.
- Business community included chambers of commerce, business coalitions, professional groups, local business leadership groups, banking community, developers, insurers, community improvement districts, freight organizations
- Schools and Universities included the Schools and Communities working group along with University System, Board of Regents, local research councils and departments housed in the universities.
- **Special interest groups** and advocacy organizations includes environmental and energy organizations, land conservation, bicycle/pedestrians, and transit.
- Civic leadership and community groups included The Civic League for a Regional Atlanta that
  provided neighborhood forum venues to discuss regional issues, including local leadership groups
  around the region.
- Neighborhood and homeowners associations through individual meetings, interaction via the internet.
- Faith organizations including umbrella groups and partnership groups for community action.
- Youth included universities programs, ARC leadership programs, and high school programs such as the Boys and Girls Clubs throughout the region.

• **Individuals or groups** that participate in ARC activities based on short-term, issue-driven concerns through online public meetings and neighborhood forums.

# **Outreach Components**

Because of the diversity of audiences, the planning process needed to incorporate a variety of ways to have conversations and to get feedback. Below are the ways PLAN 2040 was accessed:

#### **Face to Face Discussions**

**Committee Framework:** Existing committee structure at the Atlanta Regional Commission was utilized extensively on a recurring basis. Membership included ARC staff, planning partners and subject experts and members of the public.

 <u>Standing Committees</u>: ARC Board committees of Transportation and Air Quality Committee, Regional Transit Committee, Environmental and Land Use Committee, Aging Services Committee,



- and their technical committees: Transportation Coordinating Committee, Land Use Coordinating Committee, Aging Advisory Committee as well as the Atlanta Regional Workforce Board,
- <u>Standing Subcommittees</u>: ARC Committees included the Transit Operators Subcommittee, Social Equity Advisory Committee and Aging Services Advisory Committee, Bicycle/Pedestrian Task Force, Freight Mobility Task Force, Financial Planning Committee, Management and Operations Subcommittee, Public Involvement Advisory Group and the Human Services Transportation Advisory Committee.
- Ad hoc groups: Chairs/Co-Chairs Subcommittee was composed of the chair of the Transportation and Air Quality Committee, the Environment and Land Use Committee and the Aging Services Committee and met periodically in the first phases of the planning process. In addition, a Long Range Regional Forecast Technical Advisory Group convened economic experts from around the region.

**Targeted Discussions:** Targeted discussions provided input from specific population groups and modal/advocate sectors from around the region. These groups were selected so that their representation provided broad based dialogue between the general public, subject experts, and planners. These group discussions were integral to the overall process because of the increased interaction with these groups and planners. Over a third of all outreach meetings held during PLAN 2040 were in this category.

Stakeholder Briefings: At strategic times during the process, groups were gathered to talk together, across interests and geographies. These briefings provided a chance for planning staff to share their work to date, get input and reaction to use in the next phase of work.



#### **Localized Outreach:**

The Civic League for a Regional Atlanta, in parnetship with ARC's

Transportation Access & Mobility Division, organized and hosted a Pop-Up Open House, transforming a vacant space in downtown Decatur into an informal and publically-accessible transportation open house. This newly styled public meeting is intended as a pilot to be replicated throughout the region for upcoming RTP Updates.

**Speaking Engagements:** ARC senior staff and planners were regularly invited to speak about PLAN 2040 and to engage audiences in question-and-answer discussions. The audiences ranged from professional organizations to lunch and learns and conference sessions.

# **Online and Interactive**

**PLAN 2040 online open house**: ARC hosted an interactive online open house from January 11, 2014 through February 21, 2014. This site was incorporated into the <a href="www.atlantaregional.com/RTPupdate">www.atlantaregional.com/RTPupdate</a> where detailed information is available on the RTP plans, projects and documentation. The online open house incorporated elements such as comment forms and staff email, as well as slide shows containing background information about transportation planning.

**PLAN 2040 Maps:** The PLAN 2040 website provided regional growth and system maps to help illustrate foundations of the planning process and the resulting projects derived from this process.

**Electronic invitations:** The PLAN 2040 online public meetings, public hearings, and neighborhood forums have been distributed through a Campaigner listserv. The invitations went out to thousands on the ARC contacts list – which was tailored to targeted distributions.

**Newsletters:** PLAN 2040 information was regularly provided in Regional Planning Newsbriefs, Land Matters, and Transportation Spotlight online newsletters. The Community Engagement Network received a weekly email that updated planning partners and stakeholders about PLAN 2040 progress. In addition, a monthly publication, Regional Snapshots, compiles the latest data to explore important regional issues.

**Facebook/Twitter:** ARC has an agency account in these social media and posts to Facebook and Twitter on a daily basis. When PLAN 2040 outreach activities were available, these outlets were utilized. ARC's Facebook information goes to almost 1,400 recipients, the agency's Twitter account has over 2,700 followers, and has nearly 1,000 connections on LinkedIn.



# **Public Review and Comment Period**

# Introduction

The review and comment period for the PLAN 2040 RTP (March 2014 Update) occurred from January 11, 2014 through February 21, 2014. A Pop-Up Open House, held in Downtown Decatur, opened the public comment period on January 11, 2014. A second Open House and was held at ARC's offices in Atlanta on January 22, 2014. From January 20, 2014 to February 21, 2014, an online open house was posted that presented the recommendations and implementation activities of the PLAN 2040 RTP and asked the public its thoughts. Also occurring during the review period was a public hearing before the ARC Board at its regularly scheduled meeting and presentations before stakeholder audiences. Below is the documentation of the results of this review period.

# **Receipt of Public Comment**

ARC received public comments during the review and comment period through the following:

- PLAN 2040 email 21
- RTP Public Hearing 0

These comments will be addressed below by category and ARC staff response.

# **Outreach Impacts**

The PLAN 2040 development process was unique from previous regional plans. It is a true comprehensive plan combining land use and transportation and reaches out to areas not traditionally addressed in metro Atlanta's past regional plans like aging, workforce development, and health impacts. PLAN 2040 was also informed as to the priorities of the State of Georgia through the first ever Statewide Strategic Transportation Plan and updated DCA regional planning rules. PLAN 2040 benefited and was informed by other regional efforts such as recent and ongoing local planning efforts like Comprehensive Plan updates and new Comprehensive Transportation Plans, as well as continuous and ongoing public outreach.

In order to build an efficient plan to meet needs and further regional goals with limited resources, PLAN 2040's outreach incorporated targeting stakeholders and receiving broad public input. Policy-makers and their staffs, private sector leaders and non-governmental organizations, individuals or groups that traditionally participate in ARC activities, and minority or underserved populations were the focus of outreach efforts. This was complimented by receiving broad public input from around the region through the use of a variety of formats including online public meetings and surveys. The following aspects of the plan strongly reflect what ARC and its planning partners heard from the outreach process and make of the focus of public interest:

What the Public has Said	PLAN 2040 Response
Maintain existing and expand transit services	<ul> <li>✓ Financial support of regional transit operators for preservation of existing system and state of good repair</li> <li>✓ Multimodal Passenger Terminal</li> <li>✓ Clifton Corridor, I-20 East Corridor, Atlanta Beltline and Streetcars</li> <li>✓ Alternatives analysis for light rail projects in Cobb and Gwinnett Counties</li> <li>✓ Managed lanes encourage expansion of bus service by offering reliable trip times</li> <li>✓ Human Services Transportation</li> </ul>
Greater emphasis on promotion of health in development and implementation of plans	<ul> <li>✓ Livable Centers Initiative, Regional Development Guide, and Unified Growth Policy Map support needed land uses</li> <li>✓ One of the plan's goals is to "Encourage Healthy Communities" and one of the objectives is to "Foster a Healthy, Educated, Well Trained, Safe and Secure Population"</li> <li>✓ Last mile connectivity emphasis area of STP Urban program will fund new bicycle and pedestrian projects that support active transportation</li> <li>✓ Livable Centers Initiative</li> <li>✓ Lifelong Communities</li> <li>✓ Federal air quality goals met</li> <li>✓ Recommends incorporating Health Impact Assessment findings into plan implementation and updates</li> <li>✓ Air quality and greenhouse gas analysis</li> <li>✓ The Plan Management element of RTP articulates key actions that</li> </ul>
Improve implementation of plan recommendations	need to be taken to implement the plan, a process for tracking a reporting implementation of actions and specific projects, and identifies measures to track the impact of the plan on the Atlanta region.  Comprehensive Transportation Plan Program Performance Framework used to evaluate and select projects Environmental consultation and mitigation

# **Detailed Public Comments and Responses**

## **Freight**

#### Comment

Are the politicians paying attention at all? Do they realize a lot of congestion is caused by slow moving trucks in traffic whose loads often are passing through Atlanta and should be on rail but there is no system set up to tax trucks appropriately for passing through the state and actually paying the costs of maintaining roads for freight thus creating incentives for using rail? Why are we building more road capacity before exhausting other more efficient options?

#### Response

Freight movement is an important part of the state and regional economies and truck drivers pay motor fuel taxes to support the maintenance and expansion of the roadway network. However, existing revenue streams, from both commercial operators and private automobile drivers, are proving insufficient to support the amount of infrastructure built over the last several decades. Dialogue must continue on how to expand revenue from a variety of sources to ensure that all parts of the transportation network can continue to function as well as possible and support economic growth. All options to move people and/or freight in the most efficient manner possible must be part of that discussion. Diverting truck traffic to the rail network cannot be solved strictly at the regional level, however, and would need to be addressed at either the multi-state or national level to ensure system continuity. ARC is prepared to actively participate in any discussions on that issue which may be initiated by the state and/or federal governments.

## **Planning**

#### Comment

The <u>DeKalb County 2014 Transportation Plan</u> has projects which could address many of our transportation concerns, but for a variety of reasons they will not be able to find funding to complete even our most urgent projects. Here are the projects from their plan which I think will have the most impact on Chamblee and the North DeKalb region. The projects I have **bolded** are the ones that I feel are the most urgent and should be added to your plan:

- Project ID 1362: Buford Highway/P'Tree Industrial Blvd: Buford Hwy/ Peachtree Industrial Blvd - new alignment.
- Project ID 2219: Chamblee Tucker Road from P'Tree Industrial Blvd to 285: Road diet to include two through lanes and a center left-turn lane and bike lanes. Operational and Pedestrian improvements will also be made at key locations along the corridor

- Project ID 3216: Chamblee Dunwoody Road from Peachtree Blvd to Cumberland Drive: Road diet candidate (subtract 2 lanes, to add bike lanes from Peachtree Blvd to New Peachtree);
   Re-stripe for bike lanes from New Peachtree to Cumberland.
- Project ID 5084: Buford Highway from County Line West to County Line East: Road diet project - subtract 2 lanes to add bus-only facilities/ transit priority facilities for Bus Rapid Transit. Includes pedestrian sidewalk and crossing improvements in key locations as well as access management along the entire corridor.

PLAN 2040 sought to accomplish a comprehensive assessment of regional needs, in tandem with local, state and federal partners, to identify projects to address these needs given current and projected fiscal constraints. As funding programs allow, ARC holds project solicitations where local governments apply to receive federal funding on new projects. The road projects referenced may be candidates for a solicitation for STP Urban funding, which is likely to occur in the latter half of 2014. We appreciate your feedback and encourage you to speak with your local transportation planning department about opportunities to advance projects to implementation.

We have shared your comments with the local representative for DeKalb County on the Transportation Coordinating Committee.

#### Comment

While the plan for 2040 looks really great and is very exciting to look at, I am curious to see where all the funds will be coming from for all these new projects. The funds set in place right now do not seem like they can fund all of the projects. Will you be introducing new ways to raise revenue for transportation development throughout the region? Also, I understand to goal is to have all of these projects completed by 2040, but is there already a set yearly schedule in place for when each project needs to be completed?

Something else I noticed is that while all the major areas of Atlanta will be connected by bus or rail with Plan 2040, but when commuters use the bus or train, how will they then get to work? I understand planners refer to this as the "last mile" that usually inhibits people from using transit because the place they are trying to get to is too far from the nearest public transit station (esp since Atlanta is so spread out and car-centric) Will local governments have to fund city transit systems to then get then workers to their final stop?

#### Response

PLAN 2040 contains two elements in the Regional Transportation Plan (RTP). The first is the financially constrained element, reflecting the investments the region can afford between 2014 and 2040. Within this element is the Transportation Improvement Program (TIP), which allocates federal funds for use in construction of the highest-priority projects in the first six years of the plan (through fiscal year

2019), and this is a fiscally constrained list. The second element is the Aspirations Plan, which is an expression of what is possible to accomplish with transportation in the Atlanta Region if additional revenues are identified in the future.

The transit vision in PLAN 2040 that connects a large portion of the Atlanta Region with bus and rail contains both constrained and aspirational components. This conceptual map was developed through a planning process that included local jurisdictions in the region. Local jurisdictions and planning partners such as GDOT and MARTA implement the construction of all projects in the Plan, and are awarded funds on a competitive basis as funding becomes available. These planning partners develop final plans of how projects interface with the surrounding communities.

#### Comment

As a 40 year resident of Metro Atlanta I have noted that a major source of our traffic congestion is poor signage. Many bottlenecks are created by poor road sign management. There are too many to list here but a prime example is on I-285 East approaching I-85 North. The above-the roadway sign has 2 arrows indicating 2 lanes for northbound I-85. The problem is-the arrows point not to the lane, bot to the lines between the lanes. It is confusing to me every day I travel onto I-85 North. I have to count the lanes to be sure I am in the proper lane. For strangers to the area, it is unintelligible and the bottleneck here shows that. That is one out of many examples. Before we spend a lot of money on new lanes/roads, why not see what new signs, or properly placed old signs might accomplish.

#### Response

Confusing or inadequate signage can cause drivers to slow and/or erratic movements at key decision points, increasing the potential for congestion and crashes. GDOT constantly strives to ensure that highway interchanges are well signed and installs or upgrades signs around the region on a continual basis. They also are exploring more innovative driver information techniques, such as painting interstate shields on various lanes of 1-75/85 through downtown Atlanta to alert drivers of proper lane positioning well in advance of the Brookwood split and the 1-20 interchange.

We have shared your comments about this location with the Georgia Department of Transportation for their consideration.

#### Comment

The unbridled high-rise development projects in the Atlanta region are going to be a greater threat to transportation than any other factor. Without spending on infrastructure needed today (including transportation, water, sewers, schools and community services), the area cannot afford these developments. A moratorium on these developments is mandatory. We can't keep trying to stuff a 5 pound bag with 10 pounds of special interest projects and expect us to pay for them.

Future growth and desired land use were key components of the performance-based planning process used to develop the PLAN 2040 Regional Transportation Plan. Only those projects that were compatible with regional development goals were considered for federal funding. ARC supports the direction to program funding for investments that promote development goals and will continue to emphasize this as PLAN 2040 is implemented.

It is also important to note that Georgia is a home rule state, which means that all decisions related to land use and zoning reside with city and county governments. While ARC can serve as a resource to help local governments understand the consequences of various development patterns and to proactively plan for them as much as possible, it cannot dictate what types of development can occur in a given area.

#### Comment

Why are unneeded projects like...

AR-ML-410 - 110600-Programmed I-85 NORTH MANAGED LANES - INCLUDING SOUTHBOUND AUXILIARY LANE FROM SR 20 TO SR 317 AND NORTHBOUND AUXILIARY LANE FROM SR 20 TO SR 324 (GRAVEL SPRINGS ROAD)

...even on the project list? There are higher priority projects like rail transit extension into Gwinnett that are much more important and will have a much greater impact on traffic. That \$112M would pay for the beginnings of a light rail system from the Doraville MARTA station into Gwinnett. We don't need the managed lanes extended north – if anything extension across the top end perimeter is warranted first. There is no current or future need if a real alternative to driving is provided in that corridor. Traffic in the I-85 corridor north of I-285 is caused by lack of alternatives for people going across the top end perimeter. Light rail from the Gwinnett Arena to the perimeter center area would relieve the congestion between those two points on the existing roads.

#### Response

At this time, planning for a rail transit extensions into Gwinnett County or from Gwinnett to the Perimeter area have not been studied to the point where a preferred alignment, technology, or initial cost have been identified. Once that has been completed, the potential project can be reviewed for consideration to be included in the RTP.

We have shared your thoughts on the most appropriate projects for the northeast part of the region with MARTA, GDOT and Gwinnett County.

#### Comment

Project for consideration in Cobb County: Canton Road Connector, between Sandy Plains Road and I-75 northbound on / off ramps (1.2 miles), add one lane in both directions (for a total of six lanes) with each becoming a right-turn only lane at its terminus.

#### Response

We have shared your suggestion with Cobb County staff for their consideration as they develop priorities for future funding opportunities.

#### **Bicycle and Pedestrian**

#### Comment

The <u>DeKalb County 2014 Transportation Plan</u> has projects which could address many of our transportation concerns, but for a variety of reasons they will not be able to find funding to complete even our most urgent projects. Here are the projects from their plan which I think will have the most impact on Chamblee and the North DeKalb region. The projects I have **bolded** are the ones that I feel are the most urgent and should be added to your plan:

- Project ID 007: New Peachtree Road from Clairmont Rd to Doraville MARTA station: Detailed corridor study is needed: provide improved bicycle and pedestrian access incl a combination of bike lanes, fill in sidewalk gaps, or multi-use sidepath. Realign the intersection of New Peachtree Rd at Shallowford Rd NE.
- Project ID 0825: Clairmont Road from Buford Highway to Peachtree Industrial: Install sidewalks and improve pedestrian crossings along this corridor.
- Project ID 0858: Dresden Drive from Peachtree Road to Plaza Fiesta: Install sidewalks and improve pedestrian crossings along this corridor.
- Project ID 2230: Clairmont Road from Peachtree Blvd to Buford Highway: Improve access for bikes along this corridor.

#### Response

The projects included within a local planning document will need to be introduced into PLAN 2040 RTP and the short-range Transportation Improvement Program (TIP) though the ARC's Transportation Coordinating Committee (TCC). ARC holds project solicitations where local governments apply to receive federal funding on new projects and this is the primary method for adding new projects to the TIP. The projects referenced may be candidates for solicitations for STP Urban or Transportation Alternatives funding, which are likely to occur in the latter half of 2014. We encourage you to speak with your local transportation planning department about opportunities to introduce projects and advance them to implementation.

We have shared your comments with the local representative for DeKalb County on the TCC.

#### Comment

Old National Highway Pedestrian is close for ARC public consumption, right of way and easements are not complete.

#### Response

This comment is from a local government and relates to the status of a TIP project. No comment is required.

#### Comment

Global Gateway Connector Bicycle and Pedestrian Bridge shows only the design portion with no reference to the \$3.5 million costs or the \$784,000 local portion

## Response

The referenced project was partially funded for scoping and engineering activities under a 2013 solicitation for projects under the Transportation Alternatives program. Another solicitation is likely to occur in the latter half of 2014 and there is an opportunity to secure additional federal funds for the completion of the project.

#### **Roadways**

#### Comment

The <u>DeKalb County 2014 Transportation Plan</u> has projects which could address many of our transportation concerns, but for a variety of reasons they will not be able to find funding to complete even our most urgent projects. Here are the projects from their plan which I think will have the most impact on Chamblee and the North DeKalb region. The projects I have **bolded** are the ones that I feel are the most urgent and should be added to your plan:

- Project ID 660: Clairmont Road and 85: Operations; Signal System Improvements, Areawide
- Project ID 668: Shallowford Road and 85: ITS; Congestion Management Improvements
- Project ID 1420: Buford Highway and Motors Industrial Way (at 285): Free flow right turn lane on northbound Buford Hwy to eastbound I-285; eastbound through lane on Motor Ind.
   Way onto I-285 eastbound ramp to eliminate storage congestion during peak hours.

The projects included within a local planning document will need to be introduced into PLAN2040 and the short-range Transportation Improvement Program (TIP) though the ARC's Transportation Coordinating Committee (TCC). ARC holds project solicitations where local governments apply to receive federal funding on new projects and this is the primary method for adding new projects to the TIP. The safety and operations projects referenced may be candidates for a solicitation for STP Urban funding, which is likely to occur in the latter half of 2014. We encourage you to speak with your local transportation planning department about opportunities to introduce projects and advance them to implementation.

We have shared your comments with the local representative for DeKalb County on the TCC.

#### Comment

On the interchange improvements only part of the top end perimeter is shown as being improved on the interchange improvement map. The entire area between I-75 and I-85 needs improvement which is shown on the RTP project map. It really isn't very clear what is planned.

#### Response

The entire I-285 North corridor between I-75 and I-85 is proposed for managed lanes being planned under the Revive285 study. A few "stand-alone" interchange and operational improvements are also proposed along the corridor and are shown independent of the larger managed lane project. These discrete projects will generally be implemented sooner than the larger managed lane project, thus requiring them to be shown separately. ARC apologizes for any confusion and invites the commenter to contact us if additional clarification is required regarding transportation improvements proposed along I-285 North.

#### Comment

Here are my questions and concerns regarding Georgia's transportation future:

- 1) At Minimum, BUILD NEW EAST-WEST alternative to I-285....a Northern Arc. Over 3 million people in northern counties without a freeway.
- 2) Build NEW I-75 BYPASS. Houston, Dallas, Raleigh all have 2,3 and even 4 loops. Atlanta needs at least a partial outer loop built.
- 3) NCDOT maintains 80,000 miles (2nd only to Texas) of highways AND spends \$3 Billion per year on NEW HIGHWAYS. They have an annual budget of \$5 Billion using \$2 Billion for maintenance. Georgia's gas prices are the same as NC's. They take in 37.5 cents per gallon just for the state (not including the 18 cent federal portion). Even though gas prices are the same in both states, Georgia is only getting 7.5 cents per gallon. WHERE IS THE REMAINING 20-30 CENTS GOING? Why doesn't Georgia have \$5 billion a year to spend like NC does?

- 4) Metro Atlanta's arterials need to have left turns removed or relocated. Research "Michigan Lefts", "Jersey jughandles", and "NC Superstreets."
- 5) Georgia's gas tax should be tripled tomorrow, and all of it used for highway improvements.
- 6) LEARN FROM OTHER STATES how to afford new highway construction. In the last 20 years and currently, NC is always building hundreds if not thousands of miles of BRAND NEW interstate-quality highways. Georgia's interstate network hasn't changed since the 1960's. WHY NOT?

Most of these comments ultimately relate to funding availability. Since Georgia's base motor fuel tax has not increased since 1971 and is not indexed to inflation, the purchasing power of that revenue has eroded significantly. And although Georgia also imposes a 4% sales tax on motor fuel, this has been insufficient to keep pace with rapid growth and the rise in project construction costs. A great deal of available funding at the state's disposal over the past decade has gone towards maintaining, reconstructing and rehabilitating the massive amount of freeway infrastructure built during the last quarter of the 20th century. This trend towards maintenance rather than expansion is likely to continue, and even accelerate, in coming years as more existing infrastructure reaches the end of its useful life.

Your thoughts on new controlled access highways will require a significant new revenue source and leadership from the state since the alignment of those suggested would likely include areas outside the Atlanta metropolitan transportation planning area.

We have shared your comments with the Georgia Department of Transportation.

#### Comment

- Spending money re-doing the I-85/Highway 74 interchange on the south side is a waste of time. Traffic may be heavy there, but spending precious dimes on that exit seems like a waste, when traffic is so much worse in so many other areas.
- Building extra CD lanes on I-75 near Forest Pkwy. Will relieve congestion there, but the millions (I think \$89 million) needed to do it doesn't fit the good it would do. Much like with the first suggestion, that money could be spent elsewhere. And not completing this until 2030 also seems too long to wait.
- One place to spend some of that extra money on is figuring out where in the world the extra Braves traffic is going to go in Cobb County in 2017 and beyond. There will have to be bus bridges that connect MARTA to CCT or something, not to mention improved interchanges near the already taxed, complicated intersection of I-285, I-75, Hwy. 41, and Windy Hill Rd. That \$\$ may come from Cobb taxpayers, but the traffic effects will extend far past Cobb and will have to fall on the state in some way, so money needs to be spent here.

- Everything is a process and planning takes ages, but not even beginning to address the GA-400 and I-285 interchange until 2017 is over ten years too late. Who knows how bad that traffic will be by then and how much the pattern could change. And for the time and cost, there really needs to be something more drastic than CD lanes put in, though they will help. The best thing that could happen to GA-400 is extending the MARTA rail up to Alpharetta.
- Making Panola Rd. move better will help I-20, but that morning ride between Conyers and I-285 is not going to get much better, even if travel on that exit will be.

These comments can be summarized as: 1) the relative need of certain projects in a regional context, and 2) the lengthy time required for implementation.

In developing the PLAN 2040 RTP, ARC conducted extensive technical analysis and outreach with state and local planning partners to determine the need and purpose of many projects. While the level of existing congestion was a major consideration in funding recommendations, the plan also had to account for safety concerns, regional equity, project readiness, the level of public and political support and future growth assumptions. The plan is updated on a regular cycle at a minimum of once every four years, so the need and purpose for many projects will be reassessed and can either be accelerated or delayed in the future as appropriate.

Once the decision is made to advance a project, the timeline for environmental review, engineering/design, right-of-way acquisition and construction can be quite lengthy. Streamlining the process as much as possible is a topic of considerable ongoing discussion within the transportation profession to address public and political dissatisfaction with the perceived slow pace of progress.

We have shared your comments on these projects with the Georgia Department of Transportation.

#### Comment

Godby Road Widening is close enough for ARC public consumption, right of way is not completed nor has the \$5,840,000 local funding been spent.

### Response

This comment is from a local government and relates to the status of a TIP project. No comment is required.

# **Transit**

#### Comment

While I acknowledge the many hours of effort into this plan and the need for fiscal constraints, the RTP active list of projects incorrectly prioritize auto travel and have little investment in transit. It is discouraging that this effort results in a permanent downward spiral on a path that cannot be sustained. Offering additional modes of transportation could transform the corridor and begin to make a meaningful connection between our Region and the rest of Georgia. The goal is a more competitive region connected to the hub cities of our state. A continued emphasis on road investment will buy only a temporary slight improvement that will be diminished over time. Specific transit projects should be judged on the highest total return on investment by connecting regions rather than activity centers. Therefore, I request that ARC reevaluate its transit project priorities such that the Atlanta – Lovejoy Commuter Rail Service (ASP-AR-430, ASP-AR-435) and/or South Corridor Heavy Rail SPUR (ASP-AR-429) projects be removed from "aspirational" to a high priority active project with targeted completion by 2020.

- Regional: Transit Oriented Development (TOD) in Clayton County would only improve the
  economy and quality of life in the surrounding counties; as Clayton's county's anemic growth
  and general economic depression has slowed growth in the whole southern metro area and
  beyond. Furthermore, the MMPT does not have a real reason to exist unless it unifies MARTA
  and commuter rail/high speed Atlanta to Macon link.
- 2. Economy: Rail, as opposed to bus, creates real property value and signifies stability and is therefore more attractive to businesses and individuals. As a result, rail in Clayton County will attract businesses and higher-paid individuals to locate to south metro Atlanta. This would cause an economic boom in the south part of our region and will help reduce the high unemployment rate in Clayton. Rail access for Clayton County is required for Atlanta to successfully apply the Aerotropolis concept to tap into ATL airport as an economic generator for the region. The airport has been well served by MARTA's connection to Fulton and DeKalb. A passenger rail line in Clayton and further south allows the rest of Georgia to connect to this premium economic asset.
- 3. Balanced growth and development: Clayton, Henry, Spalding and other south metro areas have a huge supply of low cost available land for development and re-development. This condition will permit a value capture scenario that accelerate growth and will generate revenue to underwrite the cost of developing rail. Businesses coming into Clayton county and TOD will encourage redevelopment of existing vacant properties. By contrast, automobile/road investments and extension of MARTA to them encourage urban sprawl and loss of greenspace to accommodate land inefficient development. Furthermore, economic centers in south metro Atlanta will better balance the congested north metro Atlanta pattern. This balance is also needed because the natural resources needed to accommodate the next wave of growth are available on the southside bur will be much more expensive elsewhere.
- 4. Social: Rail access will provide low income residents of Clayton county access to jobs and not require a car to participate in the job market. Redevelopment of vacant properties will

- reduce the high crime rate in Clayton County, as the vacant properties are crime magnets. In combination, this will have a significant impact on Georgia's high poverty rate, as poverty is concentrated in suburban areas like Clayton County. Importantly this approach will reduce the inequity of our current public investment strategy.
- 5. Cost and economic return: This project reuses or shares existing rail lines, and is both a lower cost development and a higher return on investment. This is possible because of the relatively low cost of land on the south side and the likelihood of values to grow exponentially.

At this time, planning for the Atlanta – Lovejoy Commuter Rail Service is being led by the Georgia Department of Transportation. GDOT did not submit this project for consideration in the constrained RTP as they have not yet identified a project sponsor who would operate the service and have not identified funding for capital or operations. The South Corridor Heavy Rail SPUR also has similar issues. No project sponsor has been identified nor have the appropriate studies been completed to identify a preferred alignment, technology, or initial costs. Once that has been completed, the potential projects can be reviewed for consideration to be included in the RTP.

We have shared your comments on these projects with the Georgia Department of Transportation and MARTA.

#### Comment

It was great to see the Concept 3 transit plan still alive but what projects will be planned to be finished by 2040? Is the implication all of them? I would prioritize the light rail line from the Gwinnett Arena to Cumberland and the Braves new stadium.

#### Response

The transit expansion projects identified to be completed by 2040 are included in Chapter 4 – Strategies on pages 4-28 through 4-31. They are also included in the project list:

- AR-400 Georgia Multimodal Passenger Terminal
- AR-411 Clifton Corridor Light Rail Transit Phase 1
- AR-420 I-20 East Transit Initiative Phase I Heavy Rail Transit Extension
- AR-470 GA 400 Transit Initiative Phase 1
- AR-475 Connect Cobb/Northwest Atlanta Transit Corridor Bus Rapid Transit Phase 1
- AR-480 Amtrak Station Relocation
- AR-490 Atlanta Streetcar Expansion Phase 1

## Comment

In thinking about what happens to traffic patterns when something goes wrong, it is a terrible waste to build a light rail line on the top end perimeter to the Cumberland Area and not build it to midtown. A

wreck on I-75 essentially cuts Cobb County off from Downtown and the Airport. There is no commuter rail to Cobb in the plan, so this is not an option. Traveling via Sandy Springs would add 40 minutes to the trip. Relying entirely on I-75 is a terrible mistake. My patients and employees coming from Cobb County to my Emory Midtown location are frequently delayed by accidents in this corridor and have no options. There is no rational reason to avoid connecting these two employment centers with rail transit.

#### Response

The decision-making adopted by ARC in early 2013 to guide development of the PLAN 2040 RTP places emphasis on providing multimodal connectivity between major employment and activity centers around the region. The bus rapid transit service currently being studied by Cobb County will also include enhanced express bus connectivity to Atlanta utilizing the existing HOV lanes. Various studies over the years to investigate the feasibility of rail service along the corridor have not gained traction due to the lack of single operator with authority to build and operate the rail line, high costs and public opposition. At this time, there is no planning work actively underway to connect the Cumberland and Midtown areas by rail.

We have shared your comments with Cobb County, the City of Atlanta, MARTA and CCT.

#### Comment

The corridor from the Marta Arts Center Station through Atlantic Station to I-75 which is shown as street car should be light rail even if it is not extended to Cumberland. People need to be able to leave their cars at I-75 and Howell Mill or Northside and come directly into the midtown area. Locating the Amtrak station (which presumably will also be a stop for commuter rail) on a streetcar route is silly if Amtrak service is expanded. A massive number of people would come at one time requiring distribution. In rush hour one accident on 17th street shuts down all transit, bus and streetcar. Separating the transit guideway from the traffic gives more options in case of a large event or traffic disruption. Atlantic Station is growing and the commercial and industrial properties on Northside Drive/Howell Mill will further develop as well.

## Response

At this time, there is no planning work actively underway to connect the Cumberland and Midtown areas by rail. The project referenced is in the aspirations element of the plan. Any project which ultimately advances will need to go through an intensive design and engineering process where the concerns raised can be addressed.

We have shared your comments with Cobb County, the City of Atlanta, MARTA and CCT.

#### Comment

The West side of Atlanta up the Marietta street/Huff Road corridor where traffic is already terrible [and] is very poorly served by the plan except for the Beltline connection. The commuter rail to South Cobb has no stops in Fulton County until the MMPT.

#### Response

At this time, there is no planning work actively underway to connect the Cumberland and Midtown areas by rail. The project referenced is in the aspirations element of the plan. Any project which ultimately advances will need to go through an intensive design and engineering process where the concerns raised can be addressed.

We have shared your comments with Cobb County, the City of Atlanta, MARTA and CCT.

#### Comment

Obviously a rail connection from Emory to Midtown (via Lindbergh) is the highest priority for me as I work in both those sites and currently have to drive.

#### Response

This corridor is being actively studied by MARTA and is proposed in the plan. We have shared your comment expressing support for a rail connection to the Emory area with MARTA.

#### Comment

The commuter rail is shown on an image on the 2040 plan, so I assumed there would be information about it. Can I assume that is is part of ARC's long term dream, but it will not come to fruition until the state makes it a priority? Our community is very concerned about the environmental impact of the construction of this rail line, and would like to stay abreast of any plans.

## Response

Commuter rail is not included in the constrained RTP. The Georgia Department of Transportation oversees commuter rail planning for the state and has not yet identified any commuter rail projects has priorities for consideration in the RTP.

#### Comment

Fixed mass transit is a boondoggle for special interests. Any rail system in our area is a massive waste of taxpayers' money. Why keep pushing for these projects when it is proven to be a waste on resources?

The Regional Transportation Plan is required to be multimodal. Through extensive local and regional planning efforts that include community and stakeholder engagement, key transit expansion projects have been identified as priorities for the communities they serve and the region. Transit is a critical component of a regional network serving a large and diverse metropolitan area, where many people who are unable to afford or incapable of operating a private automobile rely on it to access jobs, medical services and educational opportunities.

#### Comment

The transit map looks great, but I think it would be better if the 400 corridor was existing HRT, instead of LRT.

#### Response

At this time, MARTA is currently studying the GA 400 corridor to determine the appropriate alignment and transit technology for the corridor. The map you refer to is Concept 3 and is a long-range aspirational transit vision for the region and as projects go through additional study and refinement, Concept 3 is also updated. Once MARTA completes their study and determines the alignment, transit technology, and costs, the Concept 3 map will be updated.

Your comment on the desired technology for transit service along the corridor has been shared with MARTA.

#### Comment

Since a young lady questioned Keith Parker, MARTA General Manager, when transit would be extended to Clayton County (even though the Airport Station is in College Park and Clayton County), what she really wanted to know was when would it get to Riverdale to provide her service to the Northside.

State Route 138 Express Bus could be started with Clayton County SPLOST 2015 Transit funding \$10 million subject to citizen approval on May 20.

Until MARTA Rapid Rail is extended from East Point to Southern Crescent Center east of Maynard Jackson International Terminal and until Regional Rail is extended from Southern Crescent Center (or Tara Bus Rapid Transit Service (BRT)) to Jonesboro, Express Bus Service could terminate at Airport Domestic Terminal or College Park Station.

These comments have been shared with Clayton County and MARTA for their consideration in ongoing discussions about reinstating and expanding transit services in that county.

#### Comment

Commuter rails should be abbreviated to eliminate duplication and waste of money as follows:

- Gainesville to Norcross MARTA,
- Athens to Lindbergh MARTA,
- Madison to Avondale Estates MARTA,
- Griffin to southern Crescent MARTA (to be built),
- Newnan to Georgia International Convention Center ATL SkyTrain (which is a free connection to Airport MARTA Station)

#### Response

Commuter rail is not included in the constrained RTP. The Georgia Department of Transportation oversees commuter rail planning for the state and has not yet identified any commuter rail projects has priorities for consideration in the RTP. We have shared your thoughts on commuter rail scopes and their relationship to MARTA services with GDOT and MARTA.

## **Southern Environmental Law Center**

## Comment

SELC provided two letters, both of which are included at end of this section. The first letter is titled "Comments on Update to PLAN 2040 Regional Transportation Plan."

#### Response

SELC makes several comments related to continuing to improve the metropolitan transportation planning process. ARC believes these comment are worthwhile for consideration. Recognition is provided by SELC of efforts made by ARC on selected issues during development of the PLAN 2040 RTP (March 2014 Update), with suggestions offered on how those efforts can be expanded or better leveraged in the future. Key recommendations, along with a specific response for each, are as follows:

PLAN 2040 should embrace changing demographic trends

SELC states that the path laid out for PLAN 2040 recognizes fundamental changes in the region's demographics which have occurred in recent years and which are forecast to continue. SELC recommends additional commitment to several specific policies to better address these ongoing changes.

In the spring of 2013, ARC adopted a decisionmaking framework which is consistent with the policies supported by SELC. This framework will continue to provide core direction in future plan updates. The framework focuses on optimizing and managing existing assets, with priority given to maximizing person throughput within existing rights-of-way and expanding use of travel demand management strategies. System expansion activities, where necessary, are directed towards bottleneck relief, activity center access and managed lanes (to provide a reliable trip option). Transit expansion serving regional employment centers is also a priority.

ARC will continue to work with local governments and its state and federal planning partners to better institutionalize the framework strategies in all stages of the regional plan development process.

 ARC should build on its use of performance measures to not only select projects but also to quide the allocation of funds between program areas

Although the methodology for prioritizing projects within certain categories is well established and documented, SELC questions how decisions are made on which types of projects receive funding priority. The recommendation is made to use performance measures to assist in that process to deliver the desired outcomes.

Federal guidance on performance measures is still a work in progress, but ARC is prepared to integrate that into its project prioritization processes once available. The region is committed to maximizing all available funds to achieve the best possible performance of the system and advancing the goals of PLAN 2040.

 A scenario-based approach should be used to develop the funding allocation and the socioeconomic forecasts

SELC suggests testing a range of scenarios across possible funding priority areas, which is consistent with and complementary to the previous comment.

SELC also suggests that scenarios be more plausible than the extreme scenarios tested by ARC during development of PLAN 2040. These extreme scenarios did provide useful information

on the extent to which decisions could impact system performance, even if it's highly unlikely that regional policy moves in that direction.

ARC agrees that a next logical step would be to build off those efforts and define scenarios within a more narrow and reasonable range. Another plan update must be completed by early 2016 to account for an expansion of the metropolitan planning area and one of the initial tasks is likely to be identifying a matrix of socio-economic, infrastructure and finance scenarios for analysis and discussion. ARC anticipates a robust regional dialogue on what direction achieves the best balance of being reasonable, desirable and affordable.

ARC must update and expand its analysis of greenhouse gas emissions

Four specific activities are recommended by SELC on this topic. Some are more technical in nature and may be considered in future work program activities and through consultation with ARC's air quality planning partners. Others have policy implications and would need to be thoroughly vetted before any action could be taken. These recommendations will be reviewed with management for future direction.

 The region must continue to reduce mobile source ozone pollution and plan for the challenge of attaining tighter ozone standards in the future

SELC raises a valid concern about the possibility of future tighter emissions budgets and the ability of the region to meet those budgets based on a fairly small cushion in future years. ARC recognizes and shares those concerns and has discussed them with air quality planning partners through the Interagency consultation process. The particular issue described with the 2024 analysis area is largely due to an idiosyncrasy within the federal MOVES air quality model. ARC and other agencies around the country have identified this issue and raised it as a concern for possible attention by USDOT and EPA. ARC will continue to be proactive on this issue to ensure that a process is in place to adjust the plan as appropriate to meet all relevant emissions budgets.

#### Comment

SELC provided two letters, both of which are included at end of this section. The second letter is titled "Comments on CMAQ Project Recommendations."

#### **ARC** Response

SELC questions whether the dedication of federal CMAQ funds to a proposed extension of HOT lanes in Gwinnett County is the most appropriate and effective use of those funds. ARC's recommendation was based on a solicitation and technical analysis for emissions benefits which were conducted in the latter half of 2013, with funding proposed in the PLAN 2040 RTP.

Prior to the initiation of the solicitation process in mid-2013, ARC and GDOT collaborated on identifying emphasis areas for the three specific federal programs over which ARC has a direct role in reviewing and recommending projects (CMAQ, STP Urban and Transportation Alternatives). Based on FHWA guidance and discussions between GDOT and the FHWA Georgia Division office, HOT lanes were identified as one of five emphasis areas for funding. Only a single HOT lane project in the region (GDOT-2), however, was determined to be eligible under the federal guidelines and it was submitted for consideration.

The project contributes significantly to the broader RTP goal of enabling reliable trip times for drivers and transit patrons riding along the I-85 corridor. While the analysis showed that the emissions benefits of the proposed HOT lanes extension were relatively modest, other factors led to the project being recommended for funding. The HOT lanes project is at an advanced stage of readiness and is well positioned to draw down the obligation authority quickly so that the state and region do not run the risk of losing funds due to possible future actions of Congress. Importantly, a substantial backlog of unused CMAQ obligation authority exists due to poor implementation rates over the past decade. It is also important to note that GDOT-2 contributed to an overall package of CMAQ projects which were diverse in character and well spread around the region geographically, which is always an important consideration of the policy committee.

ARC is committed to ensuring that limited funding is used as effectively as possible on projects that generate the greatest benefits. Significant work is proposed in 2014 to expand the capabilities of the tool used to quantify the likely emissions benefits of projects submitted for CMAQ funding consideration. These enhancements will be reflected in the next solicitation.

## **GDOT Response**

Prior to submitting the I-85 HOT lanes extension (GDOT-2) to ARC for funding, the Department conducted a technical analysis to determine the project's eligibility for CMAQ. GDOT provided the analysis to FHWA and worked closely with their Georgia office and CMAQ experts in Washington, DC. FHWA reviewed the project specifics and found that GDOT-02 met the CMAQ eligibility requirements. And, as the SELC letter dated 2/21/14 states, "FHWA guidance concludes that HOT lanes are eligible projects."

GDOT-02 will benefit an entire region of metro Atlanta through improved reliability on I-85 in Gwinnett County. It expands the region's current HOV/HOT network and will benefit both transit and auto commuters alike. The project has been developed to its current state of readiness precisely because the policy committee of the Atlanta MPO determined that the implementation of managed lanes is sound policy.

In conjunction with the construction and opening to traffic of GDOT-02, the Georgia Commute Options (GCO) Program will actively promote carpooling, vanpooling and transit in the expanded HOT lanes. The GCO program will focus on increasing the number of individuals who choose to make an

alternative commute. A key component of the HOT managed lane project is that registered transit, vanpools and 3+ person carpools travel toll free to increase person throughput in the corridor.

# **Letters of Support**

In addition to the comments addressed above, a small numbers of letters were submitted expressing support for specific projects in the plan. These warrant no specific response from ARC and are included at the end of this section.

# SOUTHERN ENVIRONMENTAL LAW CENTER

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February 21, 2014

Via Electronic Mail and Regular U.S. Mail John Orr Atlanta Regional Commission 40 Courtland Street, NE Atlanta, GA 30303 plan2040@atlantaregional.ccm

RE: Comments on Update to Plan 2040 Regional Transportation Plan

Mr. Orr:

The Southern Environmental Law Center submits the following comments regarding the Atlanta Regional Commission's proposed update to Plan 2040. SELC is a non-profit, non-partisan organization that works throughout the Southeast to promote environmentally sustainable transportation policies and infrastructure investments.

Since Plan 2040 was adopted in 2011, ARC has done a commendable job of navigating a variety of challenging circumstances including the economic depression, the housing crash, the adoption of a new federal transportation bill, the failure of the regional transportation sales tax referendum in metro Atlanta, and the continuing decline in transportation funding. These challenges provide both the need and the opportunity to refine the way metro Atlanta approaches transportation planning. ARC should use this update to Plan 2040 and subsequent revisions to the region's long term plan to steer metro Atlanta's transportation system in a more effective and sustainable direction.

#### Plan 2040 Should Embrace Changing Demographic Trends

Several important demographic shifts have emerged or accelerated since the adoption of Plan 2040. Metro Atlanta has grown more slowly over the past several years than previously projected and significantly less than its rate of growth over previous decades. Per capita vehicle miles traveled (VMT)<sup>2</sup> and new roadway construction have leveled off and begun to decline. 3

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<sup>&</sup>lt;sup>1</sup> Regional Snapshot: 2013 Population Estimates (August 2013) <a href="http://documents.atlantaregional.com/enewsletters/reg\_snapshot/0813/pop\_estimates\_main.pdf">http://documents.atlantaregional.com/enewsletters/reg\_snapshot/0813/pop\_estimates\_main.pdf</a>
<sup>2</sup> Per Capita VMT Ticks Down for Eighth Straight Year, Eric Sundquist (February 2013)

<a href="http://www.ssti.us/2013/02/per-capta-vmt-ticks-down-for-eighth-straight-year/">http://www.ssti.us/2013/02/per-capta-vmt-ticks-down-for-eighth-straight-year/</a>

<sup>&</sup>lt;sup>3</sup> When Will We Reach Peak Road, David Levinson (January 2014) <a href="http://transportationist.org/2014/01/01/when-will-we-reach-peak-road/">http://transportationist.org/2014/01/01/when-will-we-reach-peak-road/</a>

Fewer cars are on the road<sup>4</sup> and young drivers are waiting longer to obtain their driver's license.<sup>5</sup> Metro Atlanta has seen a remarkable reversal in real estate development, away from the drivable suburban form which defined the region's growth over previous decades and toward a more walkable, urban form.<sup>6</sup> ARC is obviously aware of these trends and they are reflected, to various decrees, in Plan 2040's socio-economic forecast and its travel demand modeling. But the plan itself must be reviewed and adjusted in light of these rapidly emerging trends.

Fortunately, Plan 2040 already has many of the necessary policies in place to adapt to these emerging trends including its emphasis on multimodal transportation, maintenance and operations of the existing road network, and improving access to activity centers. But ARC must deploy these policies more assertively in its funding decisions. For example:

- · Projects to increase access in and between activity centers should be prioritized;
- The LCI program should be expanded and LCI projects should be among the first funded;
- Projects designed to accommodate future growth in driveable, suburban areas should de-emphasized and in most cases removed from the plan entirely;
- Freeway investments should focus on addressing bottlenecks and other design improvements rather than adding new capacity;
- New capacity projects should only be considered where no operational or design solutions exist;
- Funding eligible for active transportation projects (such as STP and CMAQ) should be used primarily for those purposes rather than adding new capacity.

These policies do not require a radical departure from the path forward already laid out in Plan 2040, but do require a more singular focus and commitment to these policies in funding decisions. Aggressively pursuing these policies, when combined with the changing demographic trends, will create a reinforcing cycle capable of producing the vibrant, thriving, sustainable communities envisioned in the plan. Failing to embrace to these policies will create friction between the plan and demographic trends, further exacerbating the region's transportation challenges. Plan 2040 must prepare the region for how it will grow over the next two decades, not respond to how it grew over the past two decades.

<sup>&</sup>lt;sup>4</sup> The Shrinking American Car Fleet, John Collins Rudolf (January 2010)

http://green.blogs.nytimes.com/2010/01/07/the-shrinking-american-car-fleet/? php=true& type=blogs& r=0

<sup>&</sup>lt;sup>5</sup> The Reasons for the Recent Decline In Young Driver Licensing in the U.S., Brandon Schoettle (August 2013) http://deepblue.lib.umich.edu/bitstream/handle/2027.42/99124/102951.pdf

<sup>&</sup>lt;sup>6</sup> The WalkUp Wake-up Call: Atlana, Christopher Leinberger (2013) http://business.gwu.edu/walkup/atlanta2013/

# ARC Should Build On Its Use Of Performance Measures To Not Only Select Projects But Also To Guide The Allocation of Funds Between Program Areas.

One of the important advancement in Flan 2040 is its increased use of performance measures to guide its prioritization of projects. The plan identified objective performance metrics and used these metrics to evaluate and prioritize projects based on their ability to achieve these desired outcomes. Selecting project based on performance, rather than political or other subjective criteria, anticipated one of MAP-21's key changes and is likely to produce a more effective plan.

However, one significant portion of the funding process which remains unclear, and apparently continues to be based on subjective criteria, is how available funds are allocated between program areas. Appendix C-1 lays out the methodology for deciding between competing projects within a program area but does not explain how funds are allocated between different program areas. For example, the current performance-based planning measures help identify the best "Arterial Highway Expansion" project but don't address whether the money would be better spent on "Roadway Operation/Preservation" projects. The next step in performance-based planning is to use objective performance measures not only in project selection but also in the allocation of funding between program areas. For all the same reasons performance-based planning improves project selection it will likewise improve the allocation of funding between project areas.

# A Scenario-Based Approach Should Be Used To Develop The Funding Allocation. And The Socio-Economic Forecast.

Performance metrics could be incorporated into the funding allocation decision by evaluating the performance of different funding allocation scenarios. The proposed Update calls for 71% of funding to be used for Preservation and Optimization, 26% for System Expansion, and 3% for Demand Management. Within the System Expansion category, the proposed Update calls for 27% to be used for transit, 28% for managed lanes, and 45% for general roadway capacity. It is unclear how these percentages were determined and if this division produces the optimal performance for the region. Comparing this allocation against a range of other feasible allocations would inform this decision and ensure that the region is maximizing its transportation investment.

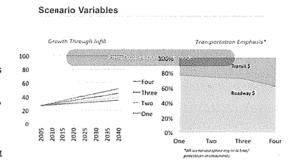
ARC should similarly examine alternate feasible scenarios with regard to the socio-economic forecast. Plan 2040 examines the performance of alternate growth scenarios, comparing a "Base Case" against three extreme land use scenarios (Ultra Sprawl, Concentrated Growth, and Local Policy scenarios). It is highly unlikely that any of these alternate scenarios would occur, which minimizes the usefulness of this scenario analysis in developing the region's long range plan.

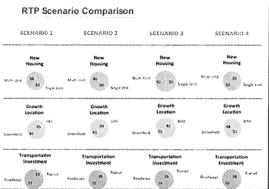
A better approach would consider the performance of a spectrum of feasible scenarios. The approach used by the Wasatch Front Regional Council in the preparation of its long range plan offers a useful comparison. The Wasatch Front Regional Council held meetings to discuss

four possible growth and development scenarios. Rather than testing hypothetical extreme growth scenarios, they considered four options along a spectrum of plausible growth. These scenarios had slightly different amounts of infill development and, as a result, slightly different mixes of roads and transit investment.

The Council solicited input from local governments, communities, and key partners on these options, and based on this input prepared a draft preferred scenario for the long range plan. In this way, the socio-economic forecast, the funding allocation, and project selection decisions were all tested through scenario analysis and optimized to produce the outcomes sought by the

region. Plan 2040's use of





performance metrics and scenario planning were important steps forward for the region's

transportation and land use planning, but these efforts must continue to improve. Ensuring that each step of the region's long range plan is tested with competing scenarios, is rated against objective criteria, and is firmly grounded in data will calibrate the plan to achieve the region's goals.

### ARC Must Update and Expand Its Analysis of Greenhouse Gas Emissions.

Another important advancement in Plan 2040 was its incorporation of greenhouse gas emission (GHG) as a planning consideration. Compared to elsewhere in the country, a greater percentage of GHGs emitted in Georgia come from the transportation sector and the state does

http://www.wfrc.org/new\_wfrc/index.php/plans/regional-transportation-plan

less to curtail those emissions. ARC's 2010 white paper considering the region's GHG emissions and Plan 2040's inclusion of GHGs in its cost benefits analysis showed important leadership on this issue. Moceling GHG emissions as part of the recent CMAQ project evaluation is another commendable step to incorporate GHGs into the regional transportation planning framework. But there are four additional steps ARC can take to further its consideration of GHGs and remain current with best practices around this issue.

First, ARC should adopt a GHG reduction goal. Similar to the MVEB and conformity determination for ozone and particulate matter, ARC could establish a regional GHG emission target (either on a total or a per capita basis) and ensure that the region's short term and long term plans are modeled to achieve that goal. Addressing GHG emissions in this fashion would be consistent with MAP-21's emphasis on performance-based planning and will position the region for future federal regulations on transportation-related GHG emissions.

Second, ARC should update its March 2010 GHG white paper, "Taking the Temperature: Transportation Impacts on Greenhouse Gas Emissions in the Atlanta Region." The modeling in this document relies on the previous regional transportation plan (Envision6) and previous CAFE standards. ARC should update the analysis in this document to incorporate the current plan, the most recent fuel economy standards, and demographic changes since the previous white paper.

Third, ARC should prepare a regional inventory of transportation-related GHG emissions. States and MPOs around the country have prepared such inventories to clarify the sources and quantities of GHG emissions from different transportation-related sectors. This information, in turn, can help identify sources which are releasing a disproportionately high portion of the region's GHGs and opportunities to cost-effectively reduce those emissions.

Fourth, ARC should iritiate a climate vulnerability and mitigation study. Climate change will impact metro Atlanta region in a myriad of ways including changing historical precipitation patterns, accelerating ozone fermation, increasing the number of severe weather events, and altering performance of transportation assets. Unless the region identifies the potential risks from climate change it cannot begir planning to address them. FHWA has initiated a climate resilience pilot program<sup>10</sup> and released a Climate Change & Extreme Weather Vulnerability

<sup>&</sup>lt;sup>8</sup>2010 State energy-related carbon doxide emission shares by sector, Energy Information Agency <a href="http://www.cja.gov/environment/emissions/state/analysis/pdf/table4.pdf">http://www.cja.gov/environment/emissions/state/analysis/pdf/table4.pdf</a>

<sup>&</sup>lt;sup>9</sup> The Chicago Region Greenhouse Gas Baseline Inventory and Forecast, (December 2009) http://www.cmap.illinois.gov/documents/10180/36697/Creenhouse-Gas-Inventory 12-7-09 final.pdf/2ea10932-c3-43-4f66-a933-af5277bed21d

FHWA: Climate Resilience Pilots

https://www.fhwa.dot.gov/environment/climate\_change/adaptation/ongoing\_and\_current\_research/vulnerability\_ass essment\_pilots/

Climate Change Adaptation Peer Exchanges: Comprehensive Report: The Role of State Departments of Transportation and Metropolitan Planning Organizations in Climate Change Adaptation, FHWA (August 2012)

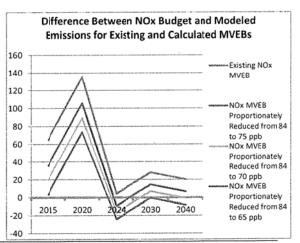
Assessment Framework document for State DOTs and MPOs to use. 11 ARC should follow the lead of its peers around the country and prepare a climate resilience study for metro Atlanta.

# The Region Must Continue to Reduce Mobile Source Ozone Pollution And Plan For The Challenge Of Attaining Tighter Ozone Standards In The Future.

As the Plan 2040 Conformity Report explains, metro Atlanta is in a transition period with respect to the National Ambient Air Quality Standard ("NAAQS") for ozone. Since the adoption of Plan 2040, metro Atlanta has both been redesignated as a maintenance area for the 1997 8-hour ozone standard (84 ppb) and classified as a marginal nonattainment area for the 2008 hour standard (75 ppb). The Environmental Protection Agency continues to evaluate the adequacy of the 2008 standard, and recent documents suggest that the standard may be further reduced to between 70 ppb to 60 ppb.<sup>12</sup>

ARC's conformity analysis is based on a Motor Vehicle Emission Budget (MVEB) adopted to comply with the 1997 ozone standard. It is highly likely that compliance with the 2008 and future NAAQS standards for ozone will require this budget to be reduced. Plan 2040's emission projections, particularly around 2024, raise concerns about the region's ability to comply with a lower MVEB.

The graph at right illustrates this problem. The blue line depicts the difference between the existing MVEB and the modeled emissions. The red, green, and purple lines depict the difference between modeled emissions and potential future MVEBs, if the MVEB is reduced proportionately to the difference between the 84 ppb standard and possible 75, 70, and 65 ppb standards. Should the MVEB be reduced to the same degree, metro Atlanta's modeled emissions would exceed the



https://www.fhwa.dot.gov/environment/climate\_change/adaptation/workshops\_and\_peer\_exchanges/2011-2012\_summary/index.cfm

<sup>11</sup> Climate Change & Extreme Weather Vulnerability Assessment Framework. FWHA (December 2012) http://www.fhwa.dot.gov/environment/climate\_change/adaptation/resources\_and\_publications/vulnerability\_assess\_ment\_framework/

Policy Assessment for the Review of the Ozone National Ambient Air Quality Standards: Second External Review Draft, Environmental Protection Agency (January 2014) http://www.epa.gov/ttn/naaqs/standards/ozone/data/20140131pa.pdf

budget in 2024 in all scenarios, and again in 2040 in two of the scenarios.

Although overly simplistic, this model illustrates the limited excess capacity available in the MVEB in future years and potential difficulties complying with tighter ozone NAAQS if mobile source emissions are not reduced further. There is no doubt that metro Atlanta's air is cleaner than it was a decade ago and ozone emissions are presently within the current MVEB. But ARC should anticipate and begin panning for lower MVEBs and a more emissions-constrained future. Reducing vehicle emissions must remain a priority, both in evaluating the region's transportation plans and in project selection.

#### Conclusion

Thank you for your consideration of these comments. If you have any questions or concerns please do not hesitate to contact me at (404) 521-9900 or <a href="mailto:bejostelega.org">bejost@selega.org</a>.

Sincerely,

Brian Gist

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February 21, 2014

Via Electronic Mail and Regular U.S. Mail John Orr Atlanta Regional Commission 40 Courtland Street, NE Atlanta, GA 30303 plan2040@atlantaregional.com

RE: Comments on CMAQ Project Recommendations

Mr. Orr:

The Southern Envirormental Law Center submits these comments on the Atlanta Regional Commission's Congestion Mitigation and Air Quality Program ("CMAQ") Project Funding Recommendation (the "Recommendation"). SELC is a non-profit, non-partisan organization that works throughout the Southeast to promote environmentally sustainable transportation policies and in rastructure investments.

ARC's process for prioritizing CMAQ projects and the resulting Recommendation largely succeeds in identifying projects that best satisfy the purpose of the CMAQ program and the region's transportation goals. The Recommendation's single shortcoming is the proposal to allocate \$44 million in CMAQ funds toward project number GDOT-02, the proposed high occupancy toll lane extension project in Gwinnett County. This recommendation is at odds with the purpose of CMAQ program and is unsupported by the project's performance data. Instead, ARC should shift a portion of this recommended funding to a suite of better-performing projects which are more in line with the purpose and goals of CMAQ.

#### Introduction

The CMAQ program was created to help areas comply with the Clean Air Act's requirements regarding transportation-related air pollution. The CMAQ program helps reduce these mobile source emissions by "realign[ing] the focus of transportation planning toward a more inclusive, environmentally sensitive, and multimodal approach to addressing transportation

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problems." Providing a dedicated source of funding for projects which reduce mobile source air pollution is the central purpose of the program and the connection between CMAQ and air quality extends throughout the program including how the funding is allocated, 23 U.S.C. § 104, where it must be used, 23 U.S.C. § 149(b), and project eligibility. The purpose and performance of GDOT-02 makes it a poor fit for the CMAQ program.

# <u>Guidance Permitting The Use Of CMAQ Funds For HOT Lane Projects Relies On A Questionable Interpretation Of Law.</u>

In recommending GDOT-02 for funding, the threshold question is whether this type of project is eligible for CMAQ funding. Although FHWA Guidance concludes that that HOT lanes are eligible projects,<sup>2</sup> this Guidance is at odds with the plain language of the statute and relies on a questionable interpretation of law.

As amended under MAP-21, the CMAQ statute provides:

No funds may be provided under this section for a project which will result in the construction of new capacity available to single occupant vehicles unless the project consists of a high occupancy vehicle facility available to single occupant vehicles only at other than peak travel times.

23 U.S.C. § 149(c)(3) (emphasis added). The FHWA Guidance looks to 23 U.S.C. § 166, which includes HOT lanes within its definition of high occupancy vehicle lanes, as the basis for concluding that HOT lanes are a high occupancy vehicle facility and therefore eligible for CMAQ funding. This interpretation is problematic because it effectively rewrites the plain language of the statute, eliminating the additional requirement that the high occupancy vehicle facility also limit single occupant vehicle ("SOV") access to off peak hours. ARC is obviously not tasked with resolving the shortcomings of FHWA's legal interpretations, but it should consider this legal deficiency and the problems that may arise from relying on FHWA's guidance.

### Funding The HOT Project With CMAQ Funds Is Not Sound Policy.

Even if it is legally permissible to use CMAQ funding for HOT lanes, allocating 39% of the region's available CMAQ funds to GDOT-02 is not a good policy choice. As the above-quoted language makes clear, CMAQ was not intended to fund SOV capacity projects. Yet GDOT-02 is likely to result in increased driving and more SOV capacity. Modeling for the region's other managed lane projects on I-75 South and the Northwest Corridor show that they will be used primarily by SOV and will increase total VMT and average annual daily traffic counts. Further, they are projected to make little impact on congestion levels in the corridor as a

http://www.fhwa.dot.gov/environnent/air\_quality/cmaq/reference/brochure/brochure03.cfm

<sup>&</sup>lt;sup>2</sup> This conclusion is contained both in FHWA's 2008 CMAQ Guidance and its recently released Interim Guidance for the program under MAP-21. See FHWA Notice of Interim Guidance and Request for Comment, Congestion Migration and Air Quality Improvement Program, 218 Fed. Reg. 67442 (Nov. 12, 2013).

whole. Approximately 85% of vehicles on the existing I-85 HOT lanes, which GDOT-02 would extend, are SOV.<sup>3</sup> Unless the demographics of GDOT-02 prove dramatically different than the region's other managed lane projects, GDOT-02 is likely to increase SOV capacity and automobile travel, the exact outcomes CMAQ was created to avoid.

Using CMAQ funds for GDOT-02 is also shortsighted given the flexibility of these funds and the imbalance in the region's overall funding portfolio. ARC has generally done a commendable job of navigating the maze of restrictions and limitations on various funding programs to ensure that worthy alternative transportation projects move forward. CMAQ funds are particularly important in this matching because they can be used for a variety of purposes which are otherwise difficult to fund such as start-up transit operations, safe routes to schools, traffic demand measures, and clean vehicle retrofits. The Recommendation's proposal to use CMAQ funds for the Atlanta Streetear, ATL-01, is an example of how this flexibility can be used to maximum impact. Although ATL-01's air quality impacts are modelled to be modest, funding this project is appropriate because it is squarely in line with the purpose of the program and would be difficult to fund through other means.

The same is not true for GDOT-02. As Georgia DOT and ARC have consistently explained, the purpose of maraged lanes is not to provide an alternative to SOV travel but to provide a more reliable option for SOV drivers. Rather than providing alternatives to the status quo, this project would reinforce it. Further, unlike transit operational costs, managed lane projects are eligible for numerous general purpose funding streams including the National Highway Performance Program, state gas tax revenue, and toll revenue. These funding programs are intended for projects to improve the performance of the region's roadways, like GDOT-02, and the amount of funding available through them dwarfs what is available through CMAQ. Stretching the meaning of the CMAQ program to fund a project which is more properly funded through other, much larger programs is not a sound policy choice.

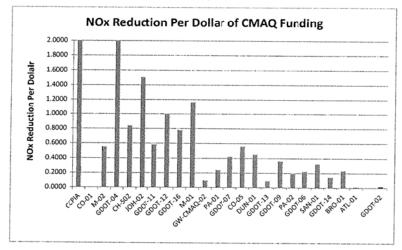
#### CMAQ Funds Should Be Redirected Toward More Cost-Effective Projects.

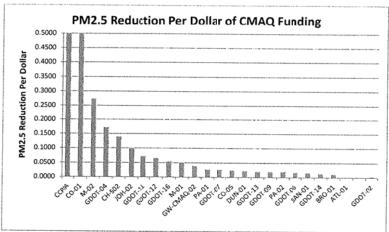
Instead of allocating \$44 million to GDOT-02, a portion of these funds should be redirected toward a suite of projects included on the shortlist but not included in the Recommendation. These Alternate Projects will provide greater air quality benefit than GDOT-02 and will do so at a lower cost.

MAP-21, Plan 2040, and the Statewide Strategic Transportation Plan all cirect that transportation funding decisions should be driven by performance measures. To this end, the Recommendation includes congestion and air quality data for the projects under consideration.<sup>4</sup>

<sup>&</sup>lt;sup>3</sup> I-85 Express Lanes Monthly Travel Data, Georgia State Road and Tollway Authority (Jan. 2014).
<sup>4</sup> ARC also modeled greenhouse gasemission reductions and the population that lives or works within ½ mile of the proposed projects. Although not expressly required for CMAQ funding, this modeling is in line with the underlying purposes of the program and is a useful input in evaluating the performance of the projects. These criteria likewise do not support funding GDOT-02 at the recommended level.

However, instead of supporting the decision to fund GDOT-02, this data reveals it to be among the least effective projects included in the Recommendation. The project's poor performance is particularly striking because it is by far the largest proposed funding amount. Considering GDOT-02's NOx and PM2.5 reductions on a per dollar basis, this project is not a sound investment.

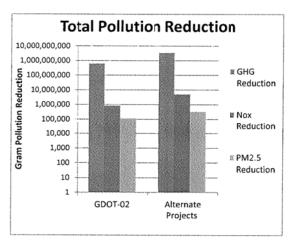




Nor can GDOT-02's funding be justified based on congestion reduction. The Recommendation indicates that GDOT-02's congestion benefits could not be modeled.  $\underline{See}$ ,

2013 CMAQ Project Solicitation at Appx. B. It is unlikely that building this project will make a meaningful impact on congestion levels on the roadway as a whole because, as GDOT has stated, managed lanes "do no; nor are they intended to, resolve or even substantially improve congestion in the general purpose lanes." HOT lanes are designed to mitigate congestion in the managed lane, not to reduce total congestion levels on the road as a whole.

Rather that committing \$44 million to GDOT-02, ARC should redirect \$26,208,000 to fund a suite of sixteen intersection operation, signal timing and transit projects. These Alternate Projects will provide greater air quality benefits than GDOT-02, and will do so more cost-effectively.<sup>6</sup>



Compared to GDOT-02, the Alternate Projects would reduce GHG emissions by an additional 2,842,809,713 grams; NOx emissions by an additional 4,315,873 grams, PM2.5 emissions by an additional 213,293 grams, and would increase the population within ½ mile of the project by 92,587 people. And the Alternate Projects would only require 59% of the funding allocated for GDOT-02.

	GHG Reduction Per Dollar(grams)	NOx Reduction Per Dollar (grams)	PM2.5 Reduction Per Dollar (grams)
GDOT-02	14.6	0.0195	0.0026
Alternate Projects	2322.7	0.1974	0.0125

The Recommendation offers three policy explanations for not funding these projects. But, when applied to GDOT-(2, these considerations make an even more compelling case for not funding GDOT-02. First, the Recommendation suggests that the Alternate Projects were excluded because they are less effective than those proposed for funding. As the information set forth above makes clear, by every metric the Alternate Projects outperform GDOT-02. Second,

<sup>&</sup>lt;sup>5</sup> <u>Final Environmental Impact Statement for Northwest Corridor Project</u> at 5-114, Federal Highway Administration (Oct. 2011)

<sup>&</sup>lt;sup>6</sup> The intersection improvement projects are ALP-01; CH-501; CL-03; DAL-01; FS-001; GW-CMAQ-04; MIL-01; NE-01; and RO-02. The traffic signalization projects are GDOT-01; GDOT-03; GDOT-05; GDOT-08; GDOT-10; and GDOT-15. The transit project is CO-03.

the Recommendation suggests that the Alternate Projects were excluded because their primary purpose is something other than improving air quality or alleviating congestion. This same critique could be levied against GDOT-02 and most of the other projects proposed for funding. Although it may not be their intended purpose, the emissions data makes clear that the Alternate Projects have merit on that basis as well. Finally, the Recommendation suggests that the Alternate Projects are better suited for funding through other means. Given the large funding programs available for HOT lane projects and the fact that these other funding programs could not be used for transit, traffic signalization or intersection improvements, this critique provides an even more compelling reason for disqualifying GDOT-02.

The region's stated commitment to performance-based planning is tested in decisions such as this one. Although managed lanes are emphasized as a key part of the region's transportation strategy, this commitment should not trump sound policy and empirical data. The performance data and policy considerations simply do not support funding GDOT-02 with CMAQ funds. ARC should use these funds as they were intended and reallocate the funding necessary to advance the better-performing, more cost-effective Alternate Projects.

#### Conclusion

The 2013 CMAQ Project Solicitation commits to fund the "top-performing" projects. The Recommendation's proposed allocation of \$44 million to GDOT-02 falls short of this goal. The region's commitment to performance-based planning, the policies behind the CMAQ program, and the statute governing these funds all support reallocating these funds to the Alternate Projects.

Thank you for your consideration of these comments. If you have any questions or concerns please do not hesitate to contact me at (404) 521-9900 or <a href="mailto:bjest@selcga.org">bjest@selcga.org</a>.

Sincerely,

Bria 7 Dis

Brian Gist

cc: Toby Carr (Georgia Department of Transportation)



February 6, 2014

John Orr, Manager, Transportation Access, & Mobility Division Atlanta Regional Commission 40 Courtland Street, NE Atlanta, GA 30303

Dear Mr. Orr:

The Perimeter Community Improvement Districts (PCIDs) offer their support of the GA 400 Collector Distributor (CD) Project (Project Identification Number: FN-AR-100A) as a top priority project of regional significance. On behalf of the boal elected officials, local business leaders and citizens, we advocate that the GA 400 CD Project remain in the project list as part of ARC's update to the PLAN 2040 Regional Transportation Plan.

We also advocate that the GA400 CD Project remain authorized in years 2014-2017. This project has been on the drawing board for over a decade with an approved design and environmental authorization. Of the 63 parcels of required right of way, 42 have already been acquired on this corridor.

In addition to the federal, state and local investment in this project, the PCIDs made an investment in the implementation of the Hammond Drive Ramps at GA 400 in 2011. PCIDs invested over six million dollars of private funds to deliver this critical piece of the CD system project on an accelerated design build schedule. The full value of this investment will only be realized with the implementation of the full CD system project between I-235 and Spalding Drive.

This CD system design will shift traffic queues at interchanges to the parallel CD system, as opposed to queuing onto the GA 400 mainines. This change provides a significant reduction at ingress and egress points along GA 400 between I-285 and Spalding Drive, improving safety and reducing congestion around interchanges. The construction of the parallel CD system also provides opportunities for alternate routing of GA 400 traffic to maintain mobility around construction activities, maintenance activities and incident management.

The operational improvements of the CD system are targeted to improve the segment of GA 400 between Hammond Drive and Abernathy Road from travel speeds estimated to be 28 MPH NB and 48 MPH SB in 2018 during peak-hour to travel speeds estimated to be 50 MPH NB and 55 MPH SB in 2019 during peak-hour. Current traffic volumes peak at approximately 210,000 vehicles daily on sections of this corridor.

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Central Perimeter is one of the largest office submarkets and Fortune 500 centers in the region with 33 million-square-feet of office space. Real estate within the 4.2 square-mile area of the PCIDs at the market's core generates approximately \$306.6 million in tax revenues for the State of Georgia annually. Central Perimeter is also one of the largest employment centers in the region, providing 123,515 jobs. According to the ARC-, 88 percent of those jobs are filled by employees commuting into the area. And, 79 percent of the 65,639 people who live in the market commute out of the area for work. Many of these commuters go through the I-285 and GA 400 Interchange and on to destinations along GA 400.

Capacity improvements to the GA 400 corridor are imperative not only for the Central Perimeter submarket, but also for the Cumberland Market in Cobb County and the growing job market in Doraville, GA 400 north to the North Fulton Market and GA 400 south to the Buckhead, Midtown and Downtown Markets.

Improvements to the GA 400 corridor would provide the connectivity necessary to retain and attract businesses in Central Perimeter, an important economic engine in Georgia. Central Perimeter contains 25 percent more commercial office space than the central business district of Charlotte, North Carolina.

Thank you for your consideration of the GA 400 CD Project as a critical need for the state of Georgia and the Atlanta region.

Sincerely,

Yyonne D. Williams President and CEO

Perimeter Community Improvement Districts

from William

Cc:

Governor Nathan Deal
Lieutenant Governor Casey Cagle
Speaker of the House David Ralston
US Senator Johnny Isakson
US Senator Saxby Chambliss
Member of Congress Tom Price
Mayor Rusty Paul, City of Sancy Springs
Mayor Mike Davis, City of Dunwoody
Mayor J. Max Davis, City of Brookhaven
Mayor Eric Clarkson, City of Chamblee
Mayor Donna Pittman, City of Doraville
Chris Riley, Chief of Staff, Governor Nathan Deal
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Dan Moody, Board Member, CDOT
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Kerry Armstrong, Board Chair, ARC
Liane Levetan, Board Member, ARC
Jane Hayse, Director, Center for Livable Communities, ARC
John Heagy, Chair, Central (DeKalb) Perimeter Community Improvement District
Chuck Altimari, Chair, Fulton Perimeter Community Improvement District
Donna Mahaffey, Chief of Staff, Perimeter Community Improvement Districts

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February 6, 2014

John Orr, Manager, Transportation Access, & Mobility Division Atlanta Regional Commission 40 Courtland Street, NE Atlanta, GA 30303

Dear Mr. Orr:

The Perimeter Community Improvement Districts (PCIDs) offer their support of the I-285 at GA 400 Interchange Project (Project Identification Number: AR-957) as their top priority project of regional significance. On behalf of the local elected officials, local business leaders and citizens, we advocate that, as part of ARC's update to the PLAN 2040 Regional Transportation Plan, the I-285 at GA 400 Interchange Project remain in the project list. We also advocate that the preliminary engineering phase of the I-285 at GA 400 Interchange Project remain authorized in year 2016. The PCIDs have committed 10 million dollars in partnership to accelerate this project and remain dedicated to assisting federal, state and local transportation agencies in developing creative strategies to move this project forward with unity among business leaders and local elected officials to benefit the entire region.

The I-285 at GA 400 Interchange is located at the top end of I-285, which was named one of the most congested corridors in the U.S. by the well-respected Texas Transportation Institute, the largest transportation research agency in the country. Approximately 200,000 vehicles pass through the I-285 and GA 400 Interchange each day. That is comparable to the entire population of Augusta - Richmond County traveling through that area daily. ARC calculations show that congestion levels will be reduced by as much as 28 percent once the project is complete.

Central Perimeter is one of the largest office submarkets and Fortune 500 centers in the region with 33 million-square-feet of office space. Real estate within the 4.2 square-mile area of the PCIDs at the market's core generates \$306.6 million in tax revenues for the State of Georgia annually. Central Perimeter is also one of the largest employment centers in the region, providing 123,515 jobs. According to the ARC, 88 percent of those jobs are filled by employees commuting into the area. And, 79 percent of the 65,639 people who live in the market commute out of the area for work. Many of these commuters go through the I-285 and GA 400 Interchange. When you add in the truck traffic and additional commutes through the top end area to other major employment centers, the numbers are staggering.

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The rate of crashes on I-285 top end exceeds the statewide average for similar roadways by more than 30 percent, according to the revive285 top end Existing Conditions Report. Segments of I-285 and GA 400 had crash and injury rates over four times the statewide average; some segments had rates over ten times the statewide average. More crashes occur near the GA 400 Interchange than near any other location along the top end of I-285.

Capacity improvements to the I-285 at GA 400 Interchange are imperative not only for the Central Perimeter sub-market, but also for the Cumberland Market in Cobb County and the growing job market in Doraville, GA 400 north to the North Fulton Market and GA 400 south to the Buckhead, Midtown and Downtown Markets.

Improvements to the interchange would provide the connectivity necessary to retain and attract businesses in Central Perimeter, an important economic engine in Georgia , Central Perimeter already has 25 percent more space than the central business district of Charlotte.

Thank you for your consideration of the I-285 at GA 400 Interchange Project as a critical need for the state of Georgia and the Atlan:a region.

Sincerely,

Yvonne D. Williams President and CEO

Perimeter Community Improvement Districts

Yrome Williami

Cc:

Governor Nathan Deal
Lieutenant Governor Casey Cagle
Speaker of the House David Ralston
US Senator Johnny Isakson
US Senator Saxby Chambliss
Member of Congress Tom Price
Mayor Rusty Paul, City of Sandy Springs
Mayor Mike Davis, City of Dunwoody
Mayor J. Max Davis, City of Brookhaven
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"WHERE QUALITY IS A LIFESTYLE"

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February 21, 2014

John Orr, Manager Transportation, Access, & Mobility Division Atlanta Regional Commission 40 Courtland Street, NE Atlanta, GA 30303

Re: Public Comment on RTP Update

Sohn

Dear Mr. Orr:

The purpose of this letter is to formally document Fayette County's support of the interchange project at State Route 74 and I-85 (FS-AR-182) in the RTP. This interchange is the vital link connecting Fayette County with the Atlanta region and substantial upgrades are needed as soon as possible to address existing safety and congestion problems.

Furthermore, we request that the funding for this project be increased to cover the costs associated with the partial cloverleaf option. As documented in the Interchange Modification Report, this option provides the best level of service in the short and long term analyses. Given the projected growth within South Fulton, Fayette and Coweta Counties, we believe implementation of any other option would be a failure with respect to addressing the long-term needs of these communities

Fayette County has, and continues to get, substantial requests from our citizens requesting improvements/upgrades/relief at this interchange. Understanding that today is the last day for public comment on the RTP, how should we direct our citizens to forward their comments to the Atlanta Regional Commission and Georgia Department of Transportation in the future? We will begin that process upon your reply.

As always, we appreciate your continued assistance on all transportation issues. Sincerely, Steve Brown Chairman, Foyette County Board of Commissioners Steve Rapson, County Manager, Fayette County Phil Mallon, Public Works Director, Fayette County

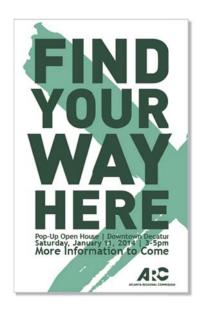
# **PLAN 2040 Outreach Exhibits**

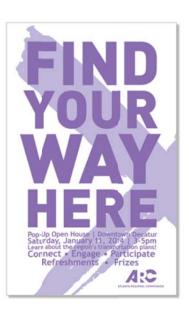
### **ARC Publications**

• ARC Regional Planning Newsbrief, January 9, 2014



Electronic flyers and posts





 ARC Community Engagement Network Newsletter December 18, 2013



ARC Events webpage



ARC News Center, January 2, 2014 http://news.atlantaregional.com/?p=1487



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## RTP Pop-Up Open House

Posted on January 2, 2014 by Grace Trimble



The Atlanta Regional Commission is hosting a new style of informational gathering from 3 to 5 p.m. on Saturday, Jan. 11 that will transform an empty storefront in Downtown Decatur into a come-and-go public meeting. It's the first test-run of an idea we got from YOU and the overwhelming response to the community engagement survey this summer.

In that survey, more than 2,000 of you said you wanted more local choices, different ways to

engage and online options. You said you wanted informal connections, innovation and, dare we say it, fun. So, save the date and come try this first "Pop-up" conversation. It's an idea we hope to replicate in communities all over the region.

This gathering is part of the latest update to the S61 billion Regional Transportation Plan (RTP), metro Atlanta's framework for mobility and prosperity. ARC invites you to come learn about transportation choices, ask questions and give us some critical input about how to make these kinds of important meetings more fun, informative and engaging.

Learn more...

This entry was posted in Main Feature, Transportation by Grace Trimble. Bookmark the permaink.

#### ABOUT ARC NEWS CENTER

The ARC News Center puts the most current information about ARC activities and programs in an easy-to-find format, organized by topic, cross-indexed and linked to the ARC website.

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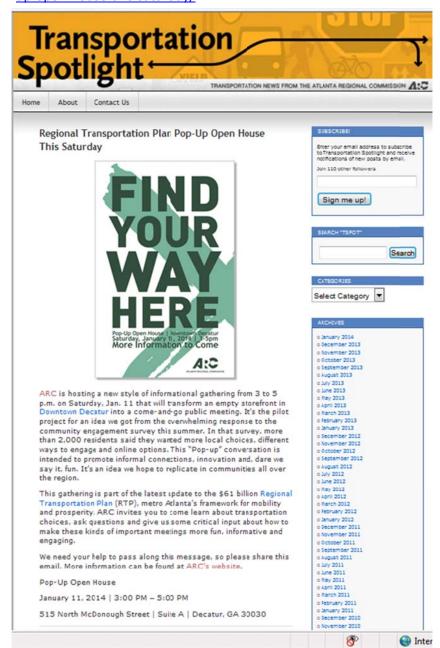
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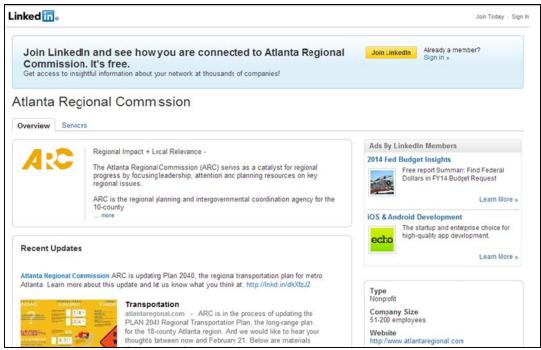
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 Transportation Spotlight blog http://transportationspotlight.wordpress.com/2014/01/07/regional-transportation-plan-pop-up-open-house-this-saturday/



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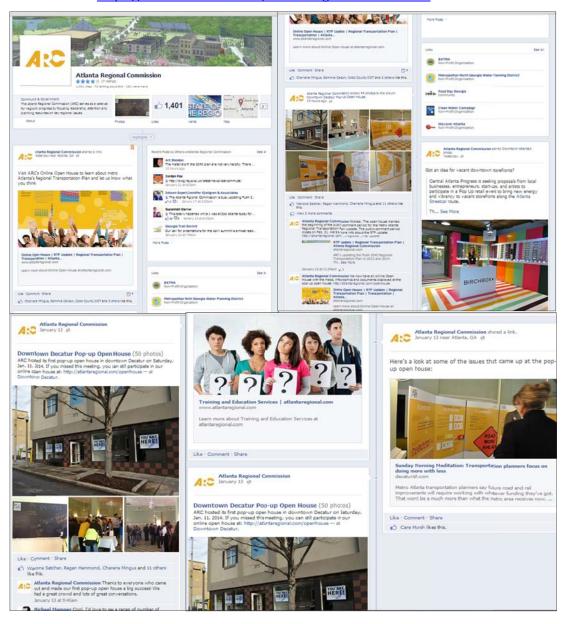
http://www.linkedin.com/company/atlanta-regional-commission

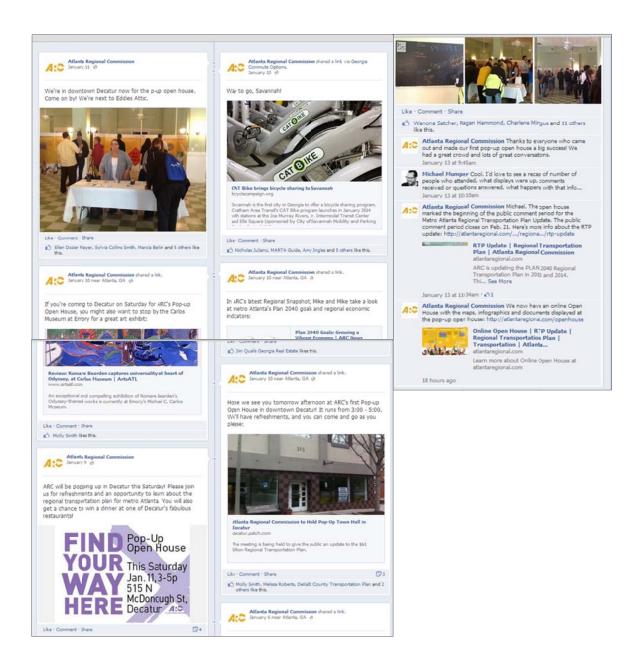






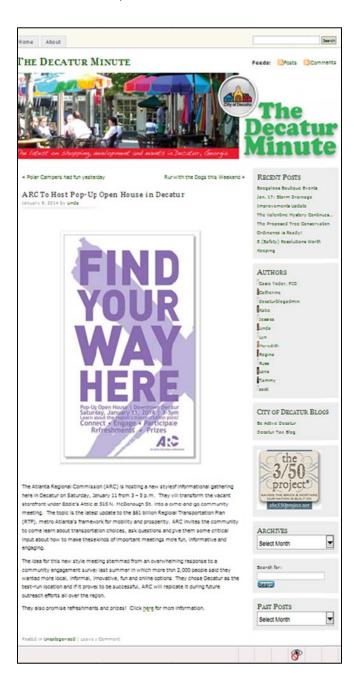
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## **Local Press**

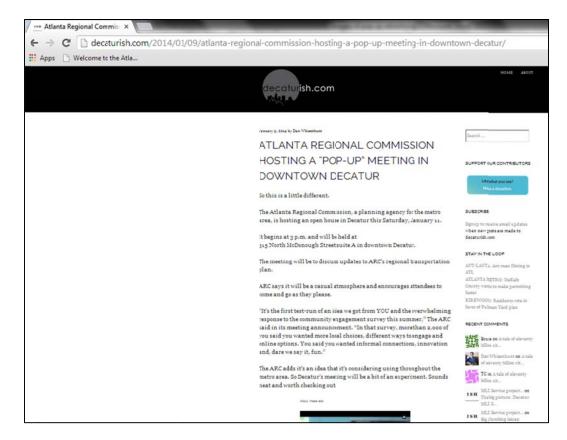
• *The Decatur Minute* at: http://thedecaturminute.com/2014/01/09/arc-to-host-pop-up-open-house-in-decatur/



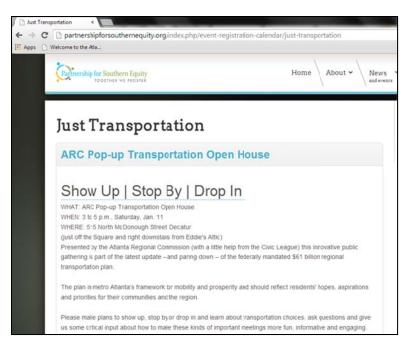
CrossRoads News at: http://crossroadsnews.com/news/2014/jan/03/arc-offers-update-transportation-plan-pop-/

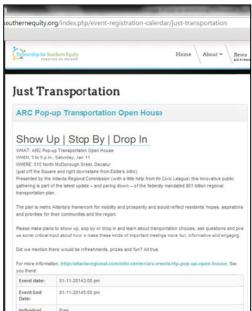


• *Decaturish.Com* at <a href="http://decaturish.com/2014/01/09/atlanta-regional-commission-hosting-a-pop-up-meeting-in-downtown-decatur/">http://decaturish.com/2014/01/09/atlanta-regional-commission-hosting-a-pop-up-meeting-in-downtown-decatur/</a>



• Partnership for Southern Equity at: <a href="http://partnershipforsouthernequity.org/index.php/event-registration-calendar/just-transportation">http://partnershipforsouthernequity.org/index.php/event-registration-calendar/just-transportation</a>

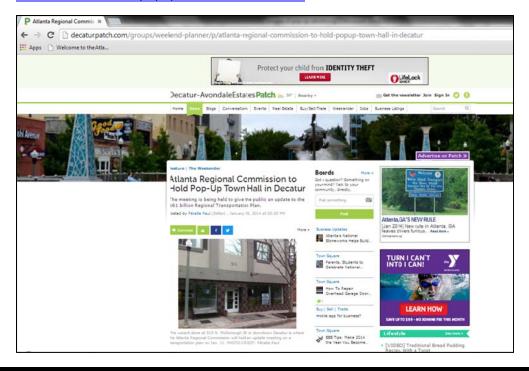




 Atlanta INtown at: https://twitter.com/ATLINtownPaper/status/422064516839780352



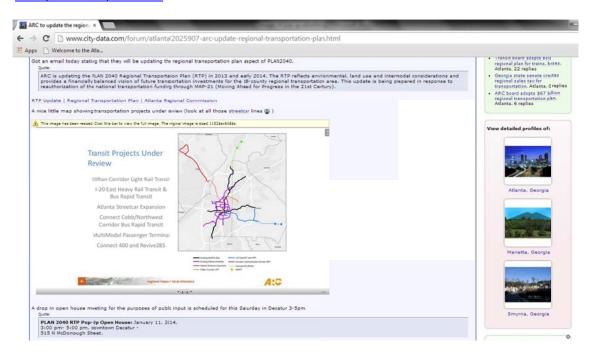
• *Decatur Patch* at: <a href="http://decatur.patch.com/groups/weekend-planner/p/atlanta-regional-commission-to-hold-popup-town-hall-in-decatur">http://decatur.patch.com/groups/weekend-planner/p/atlanta-regional-commission-to-hold-popup-town-hall-in-decatur</a>



• Civic League for Regional Atlanta at: <a href="https://twitter.com/CivicLeagueAtl">https://twitter.com/CivicLeagueAtl</a>

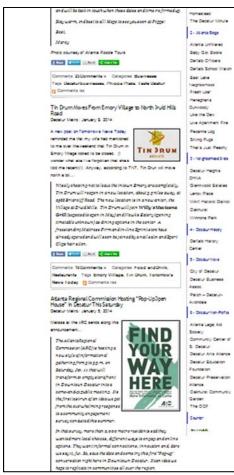


• *City Data* at: <a href="http://www.city-data.com/forum/atlanta/2025907-arc-update-regional-transportation-plan.html">http://www.city-data.com/forum/atlanta/2025907-arc-update-regional-transportation-plan.html</a>



• The Decatur Metro at: <a href="http://www.decaturmetro.com/page/9/">http://www.decaturmetro.com/page/9/</a>





 La Vision Newspaper Spanish language public notice at: http://lavisionnewspaper.com/magazine/01-10-14/





# • ARC's Online Open House

