RECORD OF DECISION

FOR

METROPOLITAN ATLANTA RAPID TRANSIT AUTHORITY'S (MARTA)

ATLANTA BELTLINE

CITY OF ATLANTA,

FULTON COUNTY, GEORGIA

DECISION

The Federal Transit Administration (FTA) has determined pursuant to 23 CFR Section 771.127 that the requirements of the National Environmental Policy Act of 1969 (NEPA) and related federal environmental statutes, regulations, and executive orders have been satisfied for the Tier I NEPA process of the Atlanta BeltLine (Project) located in the City of Atlanta, Fulton County, Georgia.

This environmental Record of Decision (ROD) applies to the proposed fixed guideway transit and multi-use trails system within a corridor of approximately 22 miles encircling central Atlanta. Tiering of the NEPA process allowed the FTA and the Metropolitan Atlanta Rapid Transit Authority (MARTA) to focus on those decisions that are ready for this level of NEPA analysis to support future right-of-way (ROW) preservation.

The Tier 1 decisions included the selection of either Modern Streetcar or Light Rail Transit technology; selection of a general alignment of new transit and trails; and establishment of the ROW needs, which were described and evaluated as the preferred alternative in the *Atlanta BeltLine Tier 1 Final Environmental Impact Statement/Section 4(F) Evaluation* (Tier 1 Final EIS) dated April 2012.

The Project Sponsor, MARTA, is working in partnership with Atlanta BeltLine, Inc. (ABI), the City of Atlanta's implementation agent for the overall Atlanta BeltLine Project, to advance transit and trail components through the Tier 1 NEPA process.

The NEPA process for the Atlanta BeltLine will not be complete until MARTA or its successor undertakes and completes a Tier 2 NEPA process, which will refine the preferred transit and trail alignments to achieve the most cost-effective investment while avoiding or minimizing potential adverse environmental effects; identify and assess trail design elements, transit station locations, vehicle types, storage facilities, site-specific impacts, and mitigation measures for impacts that cannot be avoided. Future Tier 2 NEPA activities will take place under a separate action.

If MARTA or its successor seeks financial assistance from the FTA for the preparation of the Tier 2 NEPA process, and if the FTA provides financial assistance for the Tier 2 NEPA process of the Project, the FTA will require that MARTA, and any successor agency to MARTA sponsoring or managing the Project, analyze the Project as presented in the Tier 1 Final EIS and this ROD. Any proposed change by MARTA or its successor must be evaluated in

accordance with 23 CFR § 771.130 and must be approved by the FTA in writing before the agency requesting the change can proceed with the change.

Background

The Atlanta BeltLine is a proposed fixed guideway transit and multi-use trails system within a corridor of approximately 22 miles. The Atlanta BeltLine study area is defined as ¼-mile on each side of the five existing or former railroad corridors that, together, encircle central Atlanta. Collectively, these railroad corridors form a circuit that intersects existing MARTA rail corridors near six stations: Lindbergh Center, Inman Park/Reynoldstown, King Memorial, West End, Bankhead, and Ashby. The study area is made up of four geographic zones: northeast, southeast, southwest, and northwest.

The proposed transit and trails elements of the Atlanta BeltLine are part of a comprehensive economic development effort combining greenspace, trails, transit, and new development along historic rail segments that encircle central Atlanta. The combination of the following elements is intended to attract and organize some of the region's future growth around the corridor: transportation, affordable housing, Brownfields redevelopment, land use, historic preservation, parks and recreation facilities, and economic development. It is anticipated that the Atlanta BeltLine will help reduce regional sprawl in the coming decades and lead to a livable Atlanta with an enhanced quality of life and sustained economic growth.

The Atlanta BeltLine transit and trails Project has its origins in the City's greenway plans from the early 1990's and a "Cultural Ring" concept that was refined by architect Ryan Gravel in his 1999 Master's thesis at the Georgia Institute of Technology titled, "Belt Line Atlanta, Design of Infrastructure as a Reflection of Public Policy," with transit supportive land use and pedestrian-oriented urban design principles.

In March 2005, MARTA completed the *Inner Core Transit Feasibility Study*. The study results indicated that a transit investment in the Inner Core area, inclusive of the Atlanta BeltLine study area, is feasible and could improve neighborhood connectivity, complement the existing MARTA rail system, support the redevelopment efforts within the study area, and capture new riders over the entire system.

In January 2007, MARTA completed the *Inner Core BeltLine Alternatives Analysis Detailed Screening Results for the Atlanta BeltLine*. At the conclusion of the analysis, the MARTA Board of Directors selected the B3 Alternative (Lindbergh-to-Lindbergh Loop via Inman Park/Reynoldstown) to advance to the Tier 1 EIS.

Subsequent to completion of the initial screening phase, the FTA and MARTA advanced the alternatives development and evaluation for the Atlanta BeltLine by initiating the NEPA process. The feasibility screening considered criteria such as potential physical constraints and constructability, operational constraints, ROW availability, potential for substantial negative environmental effects, and order of magnitude costs. Additionally, ABI has been completing a series of Atlanta BeltLine Subarea Master Plans for the areas around the Atlanta BeltLine to provide a framework for transit supportive land use, connectivity, and greenspace expansion.

Problem Statement

The City of Atlanta is challenged to meet its mobility, housing, and economic development needs by its uneven and low-density growth patterns, a lack of affordable housing, deficiencies of transportation connectivity across all modes, underutilization of existing transportation resources, and limited transit, bicycle, and pedestrian options to address travel needs. Individually, each of these issues contributes to reduced quality of life, mobility, and economic competitiveness. Together, they are a severe impediment to creating sustainable growth and a

vibrant, livable community in the years to come. If the City is to address these problems proactively, a comprehensive and progressive solution is required to integrate land use, economic development, social, and transportation needs holistically.

Mobility and access in the study area are challenged by a fragmented and discontinuous transportation network and a lack of transit, bicycle, and pedestrian options as follows:

The existing transportation network is frequently fragmented by major physical barriers including active and abandoned railroad lines and yards and interstate highways. It is also characterized by discontinuous local roadway, bicycle, and pedestrian networks, and superblock development patterns. These deficiencies are particularly acute adjacent to the proposed Atlanta BeltLine corridors where the continuity of the transportation network is broken by: 1) the numerous large tracts of underutilized industrial land that lack an urban transportation grid; and 2) the high density of railroad ROW and related facilities that have few existing crossings.

There is a lack of connections between the limited transit options in the study area. The existing rail and bus transit network provides limited coverage and connectivity in the study area and is focused primarily on providing service to the Central Business District (CBD) rather than circulation within the study area or to other activity centers in the City.

Stops on the existing rail service are infrequent within the study area forcing most study area residents to access rail via a bus transfer, driving or walking.

Non-motorized access options are also limited as a result of discontinuous or absent links in the City's pedestrian and bicycle network, making pedestrian access to activity centers and the rail and bus system challenging.

These transit and non-motorized conditions are particularly evident when travel between communities and neighborhoods within the City is attempted. These local trips are the dominant type of travel in the City, and are most often accomplished by personal automobile.

Transportation-related problems caused by these deficiencies include limited access and mobility, increased travel times, and roadway congestion. These problems also contribute to a lack of economic opportunity at the individual, communitywide, and citywide levels.

Project Purpose

The purpose of the transportation elements of the Atlanta BeltLine Project is to improve access and mobility for existing and future residents and workers by increasing in-city transit and bicycle/pedestrian options, and providing links in and between those networks. In addition to its transportation purpose, the Atlanta BeltLine has a land use and economic development component that is intended to stimulate economic activity and structure growth.

Project Needs

Population and Employment Growth

Population in the City of Atlanta is projected to increase to 602,700, a 26 percent increase, by 2030. The study area population is projected to increase by 29 percent to a population of 97,900 during the same period. In the City, employment is projected to increase by about 136,000 jobs, or 34 percent by 2030. The study area employment is projected to increase by 66 percent to over 82,000. These data point to a need to provide public transit improvements to accommodate growing population and employment in the study area.

Environmental Justice and Transit-Dependent Populations

Compared to Fulton County, the study area contains relatively high percentages of minority and low-income populations that qualify as environmental justice populations, as well as populations

without access to automobiles. Public transportation options are often critical to the mobility of these population groups. This indicates a need to provide public transit and bicycle/pedestrian options in those areas where environmental justice populations have been identified in the study area.

Land Use and Economic Development

Over the past 30 years, Atlanta's real estate development pattern has been skewed to the northern zones of the City. Much of this activity has been dominated by low-density, auto-centric development, such as single-family and townhouse residential development. Meanwhile, in the southeast and southwest zones, little to no development occurred during the same period. Market and demographic analyses show that without intervention these trends are set to continue into the future.

If the existing low-density land use patterns and skewed development trends continue, this may lead to increased roadway congestion, decreased mobility, and a reduced quality of life in the northwest and northeast zones, while doing nothing to address the lack of economic opportunities and quality of life issues, or make use of infrastructure capacity and redevelopment opportunities in the southeast and southwest zones. Thus, there is a need to increase transportation options in parallel with making changes in land use and development patterns in the study area to improve economic opportunities and quality of life.

Effects of Growth on Transportation System

The Transit Planning Board (TPB) *Concept 3 Creating and Realizing the Regional Transit Vision Final Technical Report* (2008) states, "Congestion is the greatest threat to Atlanta's continued economic growth." Planned improvement of transportation facilities could contribute to the reduction of congestion when implemented in conjunction with greater density of development within central Atlanta.

Connect Atlanta (Atlanta, 2008) found the average car trip originating in the City is only 5.5 miles and that 35 percent of these trips have destinations in the City. Travel patterns within the study area are expected to remain primarily short trips between neighborhoods, commercial, employment, activity centers, and MARTA rail stations. These trips include a combination of home-to-work based trips and non-work trips. These growth forecasts and travel patterns present a need to expand public transit and bicycle/pedestrian options in the study area.

Other Considerations

The Tier 1 Final EIS is a record of the comments submitted on the Tier 1 Draft EIS. The Tier 1 Final EIS includes responses to these along with additional environmental analysis. It also includes consideration of, and findings related to, requirements of the Endangered Species Act and Magnuson-Stevens Act, the National Historic Preservation Act (Section 106), the Air Clean Water Act, Section 4(f) of the Department of Transportation Act, Section 6(f) of the Land and Water Conservation Act, and Executive Orders on environmental justice and floodplains.

On the basis of FTA's consideration of the evaluations and findings of the Project's Environmental Review Documents, as well as the purpose and need, FTA finds that the Project has met all applicable requirements of a Tier 1 EIS and that this ROD is complete and supports this determination.

Alternatives Considered

As a continuation of the planning process for the Atlanta BeltLine Corridor, the Tier 1 Final EIS considers and compares the potential effects of the Preferred Alternatives with a No-Build Alternative. Each of these is described below.

No-Build Alternative

The No-Build Alternative is a baseline alternative retained in the Tier 1 Final EIS in order to provide a basis of comparison with the Preferred Alternatives. The No-Build Alternative includes the following components:

- The existing transportation system including roadways, transit service, and trails;
- All programmed transportation projects in the Atlanta Regional Commission's (ARC's) constrained *Envision6 Regional Transportation Plan* (RTP) and the *Transportation Improvement Program* (TIP) covering fiscal years 2008 through 2013, except for the Atlanta BeltLine transit and trails; and
- The trail improvements that the City of Atlanta and ABI have already constructed, or committed to be constructed, although some are elements of the Atlanta BeltLine.

Preferred Mode Choice

The initial screening analysis completed by MARTA in 2007 identified Light Rail Transit (LRT) and Modern Streetcar (SC) as viable technologies. The Project Sponsors performed conceptual engineering analyses to support the Draft EIS that took into consideration alignments within all four zones as well as MARTA Station Connectivity and Infill Station Alternative Area design considerations. The outcome of these analyses is that either mode can be accommodated throughout the corridor.

However, further examination of mode performance in terms of system, vehicle and infrastructure characteristics, as well as community desires determined that SC would be the most appropriate mode for the Atlanta BeltLine Project. SC can be implemented at a generally lower capital cost while its shorter vehicle lengths provide greater flexibility than LRT in navigating the constrained geometry of the alignments. SC may also result in fewer noise, vibration, and land use impacts. In addition, SC is better adapted to the Atlanta BeltLine operating plan that calls for frequent stops. For these reasons, SC is FTA and MARTA's preferred mode technology for the Atlanta BeltLine Project.

Transit Build Alternatives

The Transit Build Alternatives that survived the screening analysis were considered potentially viable and were assessed in the Tier 1 Draft EIS. The Transit Build Alternatives were all approximately 22-miles long and would accommodate approximately 50 proposed station locations with an average spacing of slightly less than a ½-mile.

In the northeast, southeast, and southwest zones, the Transit Build Alternatives were identical. The alignment by zone is as follows:

Northeast

The alignment begins at the Lindbergh MARTA rail station and proceeds southeast. At Ansley Golf Course, it enters the Decatur Belt, an unused freight corridor owned by Invest Atlanta, and continues south to Edgewood Avenue. At the southern end, the alignment enters the area that includes the Inman Park/Reynoldstown and King Memorial MARTA rail stations.

Southeast

The alignment begins at the Inman Park/Reynoldstown and King Memorial MARTA rail stations area and proceeds southwest. A short section of the alignment between Memorial Drive and Glenwood Avenue is on-street within the Bill Kennedy Way roadway ROW owned by the City of Atlanta. The alignment proceeds south, crosses I-20, enters the Atlanta and West Point Railroad (A&WP) BeltLine, a freight railroad owned by CSX, and proceeds southwest to Allene

Avenue. At the western end, the alignment enters the area that includes the West End MARTA rail station.

Southwest

The alignment begins at the West End MARTA rail station and proceeds northwest. From the convergence of the MARTA Station Connectivity and Infill Station Alternatives near Rose Circle, the alignment proceeds north to Martin Luther King, Jr. Drive on an unused railroad ROW owned by Georgia Department of Transportation (GDOT). At the northern end, the alignment enters the area that includes the Ashby MARTA rail station.

In the northwest zone, ten Transit Build Alternatives were examined.

There were four Transit Build Alternatives that would use portions of the existing CSX freight rail ROW. They include:

- A-CSX Howell Junction Light Rail Transit (LRT) Transit Alternative
- A-CSX Howell Junction Modern Streetcar (SC) Transit Alternative
- C-CSX Marietta Boulevard LRT Transit Alternative
- C-CSX Marietta Boulevard SC Transit Alternative

Four Transit Build Alternatives would be located adjacent to, but outside, the existing CSX freight rail ROW in the northwest zone. They include:

- B- Howell Junction LRT Transit Alternative
- B- Howell Junction SC Transit Alternative
- D-Marietta Boulevard LRT Transit Alternative
- D-Marietta Boulevard SC Transit Alternative

Two Transit Build Alternatives would be located adjacent to, but outside, the existing Norfolk Southern freight rail corridor in the northwest zone. They include:

- F- Atlantic Station LRT Alternative
- F-Atlantic Station SC Alternative

Preferred Transit Alternative

FTA and MARTA have determined that the D-Marietta Boulevard SC Transit Build Alternative, adjacent to, but outside of the CSX ROW, is the best performing and was selected as the Preferred Transit Alternative based on the analysis presented in the Tier 1 Draft EIS and the input received as part of the public involvement process, including the comments received during the Draft EIS public comment period. The Preferred Transit Alternative is shown in **Attachment A: Preferred Alternative.**

Trail Build Alternatives

In general, all Trail Build Alternatives are alongside the Transit Build Alternatives in the northeast, southeast, and southwest zones. The parallel alignment of the Preferred Transit and Trails Alternatives reduces the potential for community and environmental disruption and would be the least costly.

In the northwest zone, there were three Trail Build Alternatives evaluated:

- Marietta Boulevard Trail Alternative

- Howell Junction Trail Alternative
- On-Street Trail Alternative

The Marietta Boulevard Trail Alternative and the Howell Junction Trail Alternative would follow alongside the Transit Build Alternatives that are located adjacent to, but outside, the CSX freight rail ROW.

The On-Street Trail Alternative is parallel to the CSX railroad ROW in the northwest zone for a portion of its length; however, it would use other parallel streets and ROW for much of its length.

Preferred Trail Alternative

FTA and MARTA have determined that the best performing and Preferred Trail Alternative is a hybrid of the Marietta Boulevard Trail Alternative and the On-Street Trail Alternative, using the best features of each. It is important to note that this is not a new trail, but a combination of alignments that were each studied in the Tier 1 Draft EIS. The on-street portions of the Preferred Trail Alternative enable access to neighborhoods and parks that are not adjacent to the Preferred Transit Alternative that is shown in **Attachment A: Preferred Alternative.**

Preferred Alternatives Preliminary Cost Estimate

The cost estimates for the Preferred Alternatives are broken into two categories: capital cost, which is the initial construction costs; and operation and maintenance (O&M) costs, which are the annual cost for running the proposed system. The preliminary cost estimates will be further refined in subsequent stages of project planning and engineering design as Project elements are rendered in greater detail.

The preliminary capital cost estimate (in 2009 dollars) for the Preferred Transit Alternative is approximately $1,611 million, or about $66 million per mile constructed. The preliminary capital cost estimate for constructing the Preferred Trail Alternative is $100.4 million, or approximately $4.6 million per mile.

The preliminary O&M costs for the Preferred Transit Alternative are $14.49 million annually.

Public Opportunity to Comment and Agency Coordination

A *Public Involvement and Agency Coordination Plan* (PIAC) (MARTA and ABI 2008) was developed and implemented in accordance with Section 6002 of Public Law 104-59 "Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users" (SAFETEA-LU) that mandates the development of a coordination plan for all projects for which an EIS is prepared under NEPA. It stipulates opportunity be provided for involvement by the public and agencies. The PIAC Plan is based on ABI's *Community Engagement Framework* (CEF) created by City of Atlanta Resolution 06-R-1576 and MARTA's *Public Participation Plan.*

Key public involvement activities included a NEPA-compliant Scoping process, public workshops, community group and organization meetings, and agency coordination in the forms of a Technical Advisory Committee (TAC), and Stakeholder Advisory Committee (SAC), and other agency meetings. In addition, the Project Sponsors have provided a website for the exchange of project-related information.

Key objectives of the public involvement efforts are to facilitate public understanding, to solicit input on the Atlanta BeltLine Corridor Transit and Multi-Use Trail Alternatives, and to identify potential consequences of alternative courses of action relative to the transportation, social, environmental, and economic context.

Public comments received during the Public Comment Period can be grouped into several general categories described in Table 1 below. Each comment is addressed by the Project Sponsors in **Attachment B: Comments Received During the Public Comment Period.**

Prior to selecting the Preferred Alternatives, the Project Sponsors considered the input heard from the Technical Advisory Committee (TAC) and Stakeholder Advisory Committee (SAC) and the public during the Draft EIS as well as the results of the Draft EIS analysis of the Build and No-Build Alternatives. The committee and public input played a particularly strong role in the decision-making process as it emphasized some of the differences observed among the alternatives in the Draft EIS analysis and highlighted the importance of those differences to the community. The factors weighting the decision to select the Preferred Transit and Trails Alternatives included the fact that the feasibility of using Railroad ROW in the northwest zone is uncertain in the Tier 1 phase and that the Preferred Alternatives would:

- Provide connectivity to the most parks, neighborhoods, other transit and trails, BeltLine Tax Allocation District (TAD) acreage, and key destinations in the northwest zone such as Bankhead MARTA Rail Station, Westside Park, Atlantic Station, and Piedmont Hospital;
- Provide the most northerly access to Peachtree Street;
- Minimize private property impacts by placing alignments in existing transportation ROW; and
- Reach the largest area underserved by rail transit.

Table 1
Summary of Comments Received During Public Comment Period

Comment Category	Content
Documentation Request	Request for information or draft document
Planning Process	Comments that relate to the EIS planning process and previous or ongoing planning efforts around the Atlanta BeltLine Project
Agency Coordination	Requests for ongoing and additional agency coordination
General Support for the Project	Comments in support for the BeltLine and the planning efforts of the Project
Community Impacts	Comments from neighborhood associations, or comments about general community impacts
Environmental Impacts	Comments about the quality of the existing environment or comments concerning potential impacts of the Project
Agency Comments	Official comments from affected agencies are covered by the other categories in this table
Technology and Alignment Selection	Comments in regard to a preference for technology and stop locations

POTENTIAL EFFECTS

A summary of the potential effects of the Preferred Transit and Trails Alternatives and the No Build Alternative as described in the Tier 1 Final EIS is provided in **Attachment C: Potential Effects of the Preferred Alternative.** In addition to performing at the highest level with respect to the Project purpose and need, the Preferred Transit and Trails Alternatives would provide many transportation, community, and environmental benefits.

These benefits are achieved through planning and design efforts to date that have optimized the alignments and operations in response to the purpose and need and public input, while avoiding

or minimizing adverse community and environmental impacts. The application of avoidance and minimization strategies will continue during the Tier 2 NEPA analysis to develop effective mitigation commitments to overcome unavoidable impacts that may remain.

The NEPA process for the Atlanta BeltLine is not complete until MARTA or its successor undertakes and completes the Tier 2 analysis. The Tier 2 analysis will refine the Preferred Transit Alternative to achieve the most cost-effective investment while avoiding or minimizing potential adverse environmental effects; identify and assess trail design elements, transit station locations, vehicle types, storage facilities, site-specific impacts, and mitigation measures for impacts that cannot be avoided.

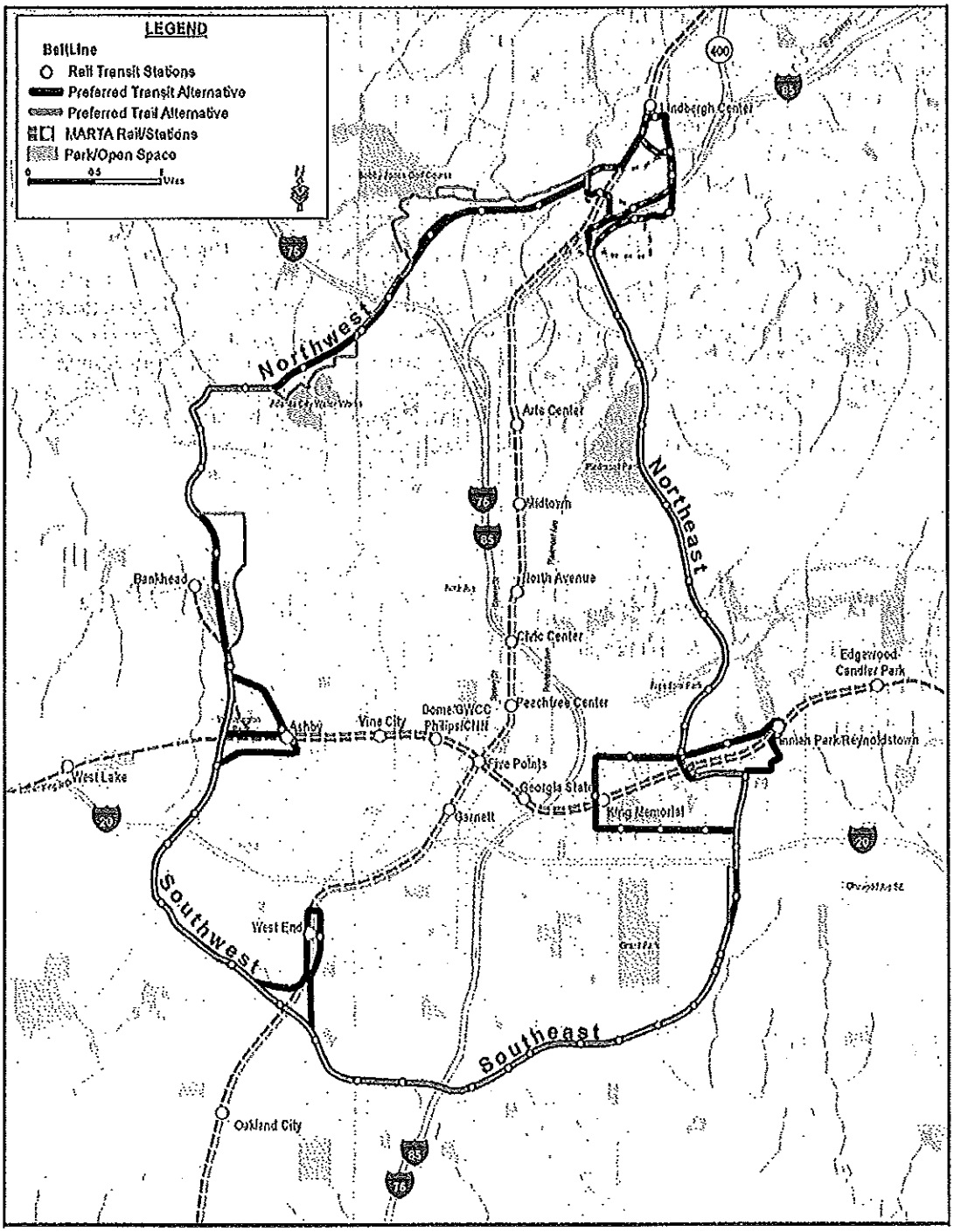
Public and agency outreach will continue during the Tier 2 NEPA analysis as a means of developing and evaluating the elements of the Atlanta BeltLine. Also, MARTA or its successor will assure that the Preferred Alternative has been included in the ARC 2040 Long Range Transportation Plan (LRTP) and the Transportation Improvement Program (TIP) at the time of the Tier 2 analysis. The Tier 2 NEPA analysis will culminate in an environmental document that is consistent with NEPA requirements under the US Department of Transportation (USDOT) Act. Also, the Tier 2 NEPA analysis will include more discussion on Atlanta's non-attainment status for the 1997 and 2008 8-hour ozone National Ambient Air Quality Standards (NAAQS) and the 1997 Particulate Matter ($PM_{2.5}$) annual NAAQS, and a $PM_{2.5}$ hotspot analysis will be conducted to determine whether this Project is a "project of air quality concern."

Yvette G. Taylor

Date: 9-28-12

Yvette G. Taylor, Regional Administrator
Region IV
Federal Transit Administration

ATTACHMENT A:
PREFERRED TRANSIT AND TRAIL ALTERNATIVES



ATTACHMENT B:
COMMENTS RECEIVED DURING THE PUBLIC COMMENT PERIOD

Eight comments were received during the FEIS comment period. The comments came from the following sources: (3) comments were received from the Project email, (1) from a phone call placed to MARTA Project Manager Janide Sidifall, (1) from an email sent to MARTA Project Manager Janide Sidifall, (1) from the Project Hotline, and (2) from letters originally sent to FTA then forwarded to MARTA Project Manager Janide Sidifall.

Each of the comments could be grouped into general categories as described below.

- *Documentation Request:* Request for information or draft document.
- *Planning Process:* Comments that relate to the EIS planning process and previous or ongoing planning efforts around the Atlanta BeltLine Project.
- *Agency Coordination:* Requests for ongoing and additional agency coordination.
- *General Support for the Project:* Comments in support for the Atlanta BeltLine and the planning efforts surrounding the Project.
- *Community Impacts*: Comments from neighborhood associations, or comments about general community impacts.
- *Agency Comments*: Official comments from affected agencies. Specific content of the contents can be grouped into the other general categories.
- *Environmental Impacts:* Comments about the quality of the existing environment or potential impacts of the Project.
- *Technology and Alignment Selection:* Comments regarding preferred technology and stop locations.

Each comment is recorded below with details of its source, date, and general category. The Project Sponsors provided responses to each comment received.

Comment Record:	2012-01		
Comment by:	Jim Stokes		
	Brookwood Hills Community	**Email:**	Jim.Stokes@alston.com
Date Received:	06/2/12	**Source:**	dwa_beltlinestudy@bellsouth.net
Category:	Community Impacts		

Comment

"On behalf of the Brookwood Hills Community Club (BWH), I am submitting the following comments on the Tier 1 Final Environmental Impact Statement (Final EIS). BWH has continuously been a strong supporter of the BeltLine and believes that it is very important to the future of Atlanta.

With respect to the trail alternatives, we support the preferred Marietta Boulevard Trail Alternative. We could also support the On-Street Alternative so long as it does not invade or impact the Conservation Area covered by BWH's Conservation Easement with the City of Atlanta. We appreciate your discarding the alternative which was shown as the red dotted line on the Draft EIS map which would have had substantial adverse environmental impacts on the Conservation Area.

Based on what we currently understand, and subject to seeing the final design details, we believe that we could support the preferred Marietta Boulevard Transit Alternative "adjacent to, but outside of the CSX ROW," if it is located to the north of the CSX ROW running east from Peachtree Street, and if it does not have any adverse impact on the Peachtree Hills neighborhood. We oppose such preferred Alternative if it is located south of the CSX ROW running east from Peachtree Street because it would have substantial adverse impacts on homes in BWH. In our comments on the Draft EIS, we opposed the Marietta Boulevard Transit Alternative located in the CSX ROW, and this Alternative has been discarded in the Final EIS.

Figure 0-2 on page 0-8, as well as other figures, in the Final EIS appears to show a rail transit station in the backyards of some our BWH neighbors. We oppose any station that would be located on or impact properties in BWH or Peachtree Hills.

Thank you for your consideration."

Response
Thank you for your involvement and support. During the Tier 2 analysis, station and operating plan details will be developed in consultation with the public.

Comment Record:	2012-02		
Comment by:	Jim Stokes		
	Brookwood Hills Community	**Email:**	Jim.Stokes@alston.com
Date Received:	06/18/12	**Source:**	dwa_beltlinestudy@bellsouth.net
Category:	Documentation Request		

Comment
"We are trying to provide the final EIS to our neighborhood, and the two people to whom I have forwarded the attached letter with the link to the EIS cannot open it. Do you have a www for the EIS? Or can you forward to me a link that I can forward to others?"

Response
The following message was emailed to Mr. Stokes:

A copy of the FEIS and appendices can be retrieved at:
http://www.itsmarta.com/beltline-documents.aspx

Comment Record:	2012-03		
Comment by:	None noted	**Email:**	NA
Date Received:	06/6/12	**Source:**	Phone Hotline
Category:	Documentation Request		

Comment
Is the FEIS on display at the Atlanta Public Library – Downtown Location?

Response

The following reply was provided:
The FEIS and appendices are available in the Downtown Library – 2nd FL Reference Section.

Comment Record:	2012-04		
Comment by:	Steve Carr	**Email:**	NA
Date Received:	06/4/12	**Source:**	Phone Call to Janide Sidifall
Category:	Documentation Request		

Comment
Would like a hard copy of the FEIS and appendices since no access to the internet.

Response
Both documents were mailed on June 4, 2012.

Comment Record:	2012-05		
Comment by:	Loule Ingle Grant Park NA	**Email:**	transportation.gpna@gmail.com
Date Received:	06/12/12	**Source:**	email to Janide Sidifall
Category:	Documentation Request		

Comment
"I spoke with Mr. Steve Carr today. He advised me that he was on a mailing distribution for the BeltLine environmental impact study and that vs. making copies we should request a soft copy to be shared with the NPU-W Transportation Committee, Co-Chairs Bob Titus and Tom Jennings are copied on this request, and other committee members. This will also be shared with the neighborhood (EACA, GPNA, SAND, etc.) transportation committee chairs and association leadership.

Is there a formal request process we should follow, or can you reply to all with that soft copy of the report?

Thanks so much for your assistance."

Response
The following message was emailed to Mr. Ingle:

As requested, attached is an electronic copy of the BeltLine FEIS. The document and its appendices are also available on the Project website at: http://www.itsmarta.com/beltline-documents.aspx. These documents can also be viewed at community libraries and other locations indicated on our website (http://www.itsmarta.com/uploadedFiles/About_MARTA/Planning/Beltline_Corr/BeltLine%20FEIS%20-%20%20List%20of%20Depositories.pdf). Thanks for your interest in the Atlanta BeltLine and we look forward to your input.

Comment Record: 2012-06
Comment by: Craig Camuso, CSX **Email:** craig.camuso@csx.com
Date Received: 07/02/12 **Source:** dwa_beltlinestudy@bellsouth.net
Category: Agency Comments/Agency Coordination

Comment
"Please accept this letter from CSX Transportation, Inc. (CSXT) with regard to the Tier 1 Final Environmental Statement (FEIS) for the proposed Atlanta Beltline Project.

CSXT made comments to the Tier 1 Draft Environmental Impact Statement on September 16, 2011 which is recorded in the response section (Appendix F) of the FEIS. We appreciate the opportunity to comment and will look forward to continued discussions as the process advances.

As stated in our previous comments, due to the importance of Atlanta to our overall rail network, CSXT will have great concern to any proposal that compromise our ability to move freight in a safe and efficient manner through this heavily congested area.

Please ensure that the following CSXT representatives are included in all future correspondence:

Keith Brinker CSX Transportation 500 Water St. 10th floor Jacksonville, FL 32202 Keith.brinker@csx.com	Craig Camuso CSX Transportation 1590 Marietta Blvd. Atlanta, GA 30318 craig.camuso@csx.com	Marco Turra CSX Transportation 500 Water St. 12th Floor Jacksonville, FL 32202 marco.turra@csx.com	Dale Ophardt CSX Transportation 500 Water St. 11th floor Jacksonville, FL 32202 dale.ophardt@csx.com

CSXT does have questions on the schedule and timing of the Tier 2 process and requests that we be notified as soon as a time-table is developed so that the proper representation can be arranged."

Response
Thank you for acknowledging CSX's involvement in the Tier 1 NEPA process. Coordination with CSX and other potentially affected stakeholders will continue in the Tier 2 phase. The referenced CSX representatives will be included in the stakeholder database.

Comment Record: 2012-07
Comment by: Heinz J. Mueller, EPA **Email:** N/A
Date Received: 07/03/12 **Source:** Email
Category: Agency Comments, Environmental Impacts

Comment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

June 25, 2012

Mr. Brian Smart
Transportation Planner
Federal Transit Administration, Region IV
230 Peachtree Street NW, Suite 800
Atlanta, Georgia 30303

SUBJ: EPA Comments on the Atlanta Beltline Corridor Environmental Study
Tier 1 Final Environmental Impact Statement (FEIS)
City of Atlanta, Fulton County, Georgia
CEQ #:20120157; ERP #: FTA-E40839-GA

Dear Mr. Smart:

Pursuant to Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA), Region 4 has reviewed the subject document. EPA agreed to act as a cooperating agency for the Atlanta Beltline Project on August 19, 2008, we participated in interagency scoping and Atlanta Beltline technical advisory committee (TAC) meetings, the Beltline Sustainability Task Force and submitted Draft EIS Comments on the project. The Tier 1 FEIS evaluates the Federal Transit Administration (FTA) and the Metropolitan Atlanta Rapid Transit Authority (MARTA) proposal to develop a proposed fixed guideway transit and multi-use trails system within a continuous 22-mile corridor around the Midtown and Downtown Atlanta central business districts.

The proposed transit and trail elements of the Atlanta Beltline is intended to be part of a comprehensive development strategy that connects greenspace, trails, transit and new development along historic railroad corridor segments. The Atlanta Beltline combines transportation, affordable housing, brownfield redevelopment, historic preservation, parks and recreation, land-use component within its corridor.

The Tier 1 FEIS for the Beltline focuses on three key decisions: the selection of a preferred transit mode technology, the general alignment of transit and trails, and the necessary right-of-way (ROW). As a result of our review, EPA offers the following comments:

Two types of transit technologies were evaluated in the Tier 1 EIS - the modern street car (SC) and light rail transit (LTR). The Tier 1 FEIS identifies the SC as the preferred mode technology for the Atlanta Beltline. EPA continues to support the use of either technology for this project.

The Tier 1 EIS examined five transit alternative alignments (A, B, C, D, and F) and three trail alignments (Howell Junction Trail, Marietta Blvd Trail and On-Street Trail) in the northwest portion of the study area. Two transit alternative alignments (A and C) use portions of the existing CSX freight rail right-of-way (ROW), two transit alternative alignments are adjacent to but outside of the existing CSX ROW (B and D) and one transit alternative is adjacent to but outside the existing Norfolk Southern freight rail corridor. The rest of the Atlanta Beltline (northeast, southeast, southwest) follows the same transit and trail alignment.

EPA notes that alignment D was selected as the preferred transit alternative in the Tier 1 FEIS. This alignment includes the Marietta Boulevard Street Car. EPA typically promotes the selection of alternatives that utilize existing transportation ROWs because this would minimize the need for additional ROW and reduce the number of impacted parcels. ROW will be required to build the transit and rail network which can expose neighboring populations to moderate levels of noise.

The development of additional mass transit options for the populations within the City of Atlanta is a desirable goal. EPA supports this type of project in urban areas because it provides an alternative to the sole reliance on automobiles for transportation demand, and with proper mitigation should result in fewer adverse impacts. From an air quality perspective, mass transit options generally reduce the amount of additional green house gas emissions in the transportation corridor. However, they are not without impacts. The Tier 2 FEIS should address specific parcel related impacts, noise, air quality, and water resource impacts associated with the selected corridor alignments.
A Attached are some specific air quality comments that should be addressed prior to the signing of the record of decision for the EIS.

Thank you for the opportunity to comment on this proposed action. If we can be of further assistance, please feel free to contact Ntale Kajumba at (404) 562-9620 of kajumba.ntale@epa.gov.

Sincerely,

Ntale Kajumba

for Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management

EPA Tier 1 FEIS Comments on the Atlanta Beltline Corridor

B Air Quality - Section 3.12.1.2 "Pollutants of Concern"- The Tier 2 EIS should include more discussion on Atlanta's non-attainment status for the 1997 and 2008 8-hour ozone NAAQs and the 1997 PM2.5 annual NAAQS (Pg.3-106).

"Transportation Conformity Determination" - This project should have been carried forward into the Atlanta Regional Commission 2040 Long Range Transportation Plan (LRTP) updated last September. Before FTA signs the final environmental document or
C the record of decision, the selected alternative must be the same as it is in the LRTP. This project must also be reflected in the Transportation Improvement Program (i.e., Fiscal Year 2012-2018) if right-of-way is purchased and construction is planned in the near future (1 to 4 years). In addition, a $PM_{2.5}$ hotspot analysis will have to be conducted to
D determine whether this project is a "project of air quality concern (Pg.3-109 Section 3.12.3)."

Response

Thank you for EPA's input and support. Your Tier 2 guidance will be incorporated in the Record of Decision. Responses to the referenced comments are given below:

A. The Record of Decision will include commitments to address the air quality concerns during the Tier 2 analysis
B. This guidance will be included in the Record of Decision and appropriate Tier 2 work programs
C. The Record of Decision will include a commitment that MARTA will coordinate with ARC to ensure that the Preferred Alternative is included in the LRTP and TIP prior to the Tier 2 NEPA Approval
D. The Record of Decision will include a commitment to undertake a hotspot analysis in the Tier 2 phase

Comment Record:	2012-08		
Comment by:	Steve Carr	**Email:**	N/A
Date Received:	07/03/12	**Source:**	Letter to FTA
Category:	Public Engagement, Technology and Alignment Selection, General Support		

5 June 2012

to Brian Smart
and Keith Melton
Federal Transit Administration — Region 4
230 Peachtree Street NW — Suite 800
Atlanta Georgia 30303

re Tier 1 — Final Environmental Impact Statement — FEIS
Section 4.F Evaluation — MARTA and Atlanta Beltline
Comments by Steve Carr per page 0-10 Comment Categories

① Document Request — Thanks to MARTA's Jamide Siddiqui for the prompt sending the FEIS to me. I'm disappointed that I didn't receive Notification from Atlanta Beltline — particularly since I am an adjacent Beltline property owner, a long-time and frequent Beltline public meeting attendee and a frequent requestor of information and documentation. Even as late as 19 June 2012 at the Beltline Quarterly meeting (that wasn't — it was a 1¢ Sprost/Transportation Improvement Act referendum pep rally), no information about the FEIS was forthcoming. (However I did leave that meeting before it ended.) Also, at the poorly advertised and poorly attended Beltline Environmental Justice meeting of 7 April 2012, no mention was made of the FEIS. Follow-up information and other documentation was orally requested by me, was refused, then I immediately wrote a Georgia Open Records Act request to get the verbally mentioned information and documentation. This Request was timely responded to me by the Atlanta Beltline attorney requesting almost $100 for the seemingly public information.

page 2 - FEIS Comments by Steve Corr

(2) Planning Process — I noticed in the Appendices that none of my previous oral and written comments were included

(3) As a 30-year Atlanta resident who passionately promotes citizen engagement (as well as a former Transportation Committee chair for both Neighborhood Planning Unit-W [NPU] and the Atlanta Regional Planning Advisory Board [APAB] and a former Environmental Committee chair for both NPU-W and APAB and formerly on the Fulton County Environmental Commission), I frequently ask MARTA and implore the Atlanta Beltline for public reach-out and information. Several years ago I proactively met twice with ABI's Community outreach person and discussed ways to encourage and increase citizen engagement. Only 2 of my 17 suggestions were enacted. Since then, Beltline public meetings have generally been poorly attended, highly scripted and controlled, questions generally discouraged and/or deferred, and generally a presentation of what has already been planned by the Atlanta Beltline.

(4) Agency Coordination — No comment

(5) Comments in opposition to the Beltline project as a whole — None

(6) I generally support the Atlanta Beltline project. The planning efforts (with exception of the initial Beltline Design Charette of several years ago) generally seem to be sharing previously ABI decided-upon planning then promoting citizen buy-in, like — the general public and NPUs and APAB as well as the Tax

Allocation District Advisory Committee (TADAC) - are not actively involved in the Atlanta Beltline planning process.

(7) Support for a specific technology or Alignment - I actively support Beltline Street Cars - However, I strongly encourage more frequent street car stops (and/or undesignated stop is availability) and slower-moving street cars. The street car should be an amenity to enjoy the ride, the scenery and Beltline in addition to get-to a destination.

(8) Alternate Technology or Alignment Suggestions - The proposed Ormewood Avenue bridge stop is inaccessible while the locally desired Mercer-Berne Streets stops for elderly and disabled, Boulevard Heights, University and the Mercer Street day care facility are not included.

(9) Community impacts - Some were rejected without comment by ECOS which was bothersome. This became the Beltline plan.

(10) Environmental impacts - No apparent follow up re brown-fields in and around Boulevard, Hill Street and Milton Avenue.

(11) Cost Estimate/Funding - No comments

(12) Agency Comments - Not applicable.

(13) No Comment - No comment

Thank you for reviewing my aforementioned comments. I can be reached at 678.886.8666

Steve Carr
855 Berne Street S.E.
Atlanta Georgia 30316

Response

Thank you for your input and support. Responses to your comments are referenced below:

1. The Notice of Availability of the Tier 1 FEIS for public review and comment was advertised in the following locations:
   a. Federal Register May 25, 2012
   b. Atlanta Journal and Constitution, Atlanta Daily World, and Mundo Hispanico on June 1, 2012
   c. MARTA's BeltLine website (www.itsmarta.com)
   d. Twenty-five depositories throughout the study area and regional locations in addition to the MARTA and ABI headquarters
2. The DEIS only includes responses to comments received during the comment period.
3. Comment noted. MARTA and ABI's public outreach activities and information distribution mechanisms are described in Tier 1 FEIS Chapter 4, Public Involvement and Agency Coordination.
4. Comment noted.
5. Comment noted.
6. MARTA and ABI thank you for your support of the Atlanta BeltLine Project and for your participation in the development of the Project during the Tier 1 EIS.
7. MARTA and ABI look forward to your continued interest and participation in Project development during Tier 2 analysis.
8. Thank you for your observations and suggestions regarding the proposed stop locations. During Tier 2 analysis, you and other members of the public and interested parties will be invited to participate in and provide input on identifying specific stop locations and other Project amenities.
9. In the Tier 2 analysis, MARTA or its successor will work with the communities and public to develop detailed design of the Atlanta BeltLine Project. In doing so, the Sponsor will strive to avoid or minimize environmental impacts; including community impacts, and work with the communities and the public to integrate effective mitigation strategies where impacts cannot be avoided.
10. All environmental conditions, including Brownfields, will be considered in more detail as the Atlanta BeltLine design advances during Tier 2 analysis.
11. Comment noted.
12. Comment noted.
13. Comment noted.

ATTACHMENT C

POTENTIAL EFFECTS OF THE PREFERRED ALTERNATIVE

	No-Build Alternative	Preferred Transit and Trail Alternatives
	Transportation Systems and Facilities*	
Travel Patterns	• Would not facilitate trips among activity centers, major travel generators, or MARTA rail stations in study area • Would not increase transportation options or improve travel efficiency in study area • Substantial gaps in bicycle and pedestrian networks between activity centers will remain • Serve nearly 80,000 people and 80,000 jobs in 2030 within ½-mile of proposed station	• Serves regional Home-Based Work (HBW) trips destined for study area • Redirects over 6,000 daily trips from radial routes • Improves average travel time savings in study area • Reduces number of study area transit trips transfers • Serves nearly 138,000 people and 117,000 jobs in 2030 within ½-mile of proposed stations • Serves twice the population of underserved groups compared to the No-Build
Transit Services	• No affects to existing MARTA rail or local bus services or GRTA commuter bus service • Connects to14 planned transit and passenger rail projects • In-street alignments of planned transit projects could impact existing bus service • Does not improve bicycle and pedestrian access to and from MARTA stations and bus stops	• Reduces transit transfers and rail congestion at MARTA Five Points Station • Does not duplicate existing transit services • Connects to 21 local bus routes, 6 express routes, and 24 planned transit and passenger rail projects • In-street alignments could affect existing bus service. Shared use of lane/facilities could improve bus service, whereas exclusive lane for Preferred Transit Alternative could negatively affect bus service • Improves bicycle and pedestrian access to and from MARTA stations, bus stops, and passenger rail • Subsequent analysis in the Tier 2 NEPA phase will determine potential effects on transit services, especially schedule adjustments, to facilitate transfers between services
Roadway System	• Most travelers with origins and destinations in the study area would not be provided with a transport alternative • Provide maintenance and operational upgrades, capacity improvements • The Atlanta Streetcar, SR 13 bus rapid transit (BRT), and Memorial Drive BRT will operate in-street and could increase congestion	• Diversion of home based work (HBW) and non-work trips may slow growth of congestion on study area roadways • At-grade crossings and in-street sections will have a minor effect on roadway operations • Bill Kennedy Way in-street section may affect congestion, parking, and existing bike facilities • Forecasted congestion and nearby intersections will require design to minimize operation effects. Further analysis and design refinement will occur in Tier 2 analysis
Freight Rail	• Lindbergh/Emory High Speed Transit and the Atlanta to Lovejoy Commuter Rail would potentially use or cross freight rail corridors	• Could affect existing and future freight operations in the southeast zone • Mitigation of effects to be determined and minimized through on-going consultation with freight rail operators.
Passenger Rail	• No affects to existing passenger rail operations	• No affects to existing / planned passenger rail • Passenger rail connections support the Project need to increase transportation connections, travel efficiency, and reduce travel by personal vehicle

	No-Build Alternative	Preferred Transit and Trail Alternatives
Pedestrian and Bicycle	• Ralph David Abernathy Boulevard and Marietta Boulevard facilities would supplement existing facilities • Significant gaps in network would remain throughout the study area • Minimally responsive to Project needs • Would not increase amount of public greenspace in the study area or provide connections between parks • New bike/pedestrian facilities have no exclusive ROW	• Provides connectivity between areas separated by natural and manmade obstacles, and between activity centers, MARTA rail stations, and recreational and cultural facilities • Provides bicycle/pedestrian options in those areas in which environmental justice populations have been identified in the study area • Increases public greenspace and serves two trails • Trail has 15.9 miles of exclusive ROW
Plan Consistency	• Not consistent with a majority of the local and regional transportation plans that include the Atlanta BeltLine transit and/or multi-use trails elements in their recommendations • Consistent with the Atlanta Regional Freight Mobility Plan	• Consistent with Envision6 RTP/TIP, Connect Atlanta Plan, Concept 3, Atlanta Region Bicycle Transportation and Pedestrian Walkways Plan, Plan for a Walkable Atlanta, and the 2004-2019 Comprehensive Development Plan (CDP) • Consistent with BeltLine Redevelopment Plan and Subarea Master Plans. • Potentially conflict with the Atlanta Regional Freight Mobility Plan • Mitigation of effects to be determined and minimized through on-going consultation with freight rail operators
	Land Use and Zoning[1]	
Land Use	• Direct effects on land use in the study area by the additional ROW would be examined in the environmental analyses for each project • Inconsistent with FLUM • 213 acres underutilized land within ½-mile of potential stations	• 91.8 acres of converted land for Transit • 76.9 acres of converted land for Trails • Consistent with Future Land Use Map (FLUM) • 765 acres of underutilized land within ½-mile of potential stations • Could create pressures to convert low-density or industrial uses into higher-density uses that may be inconsistent with neighborhood character • Further analysis at the Tier 2 phase will evaluate potential effects
Zoning	• Inconsistent with zoning because the base zoning districts were adopted to support the CDP and FLUM • The purpose of the existing Atlanta BeltLine Overlay District would not be met	• Consistent with the Atlanta BeltLine Overlay District • Transit infrastructure is permitted except in Multi-Family (MR) zones • Trails are permitted in public ROW, but outside of ROW, must meet zoning setback and buffer requirements if not designated as parks • If designated as parks: o Special Use Permit required in Residential and Office zoning districts o Application process available under existing regulations in MR, Mixed Residential Commercial, and Planned Development districts • Some districts require amendments to permit parks • Further analysis at Tier 2 phase to evaluate potential mitigation steps
Local Plans	• Not fully consistent with the CDP • Not consistent with the other plans	• Consistent with the CDP • Consistent with the local Atlanta BeltLine Subarea Master Plans

	No-Build Alternative	Preferred Transit and Trail Alternatives
Economic Development Strategies	• Direct short term positive effect associated with construction employment • Supports the long-term economic conditions • Serves seven economic development focus areas • 101 acres of potential residential and commercial development capacity within ½-mile of proposed stations • Inconsistent with the economic development strategies in the CDP relative to the Atlanta BeltLine • Would not support the estimates of the economic growth in the study area	• Direct short-term positive effect associated with construction employment • Supports the long-term local and regional economies • Serves 20 economic development focus areas • 499 acres of potential residential and commercial development capacity within ½-mile of proposed stations • Will serve approximately 4,916 acres of Atlanta BeltLine TAD land • Could conflict with the City's policy of retaining as much industrial land within the City as possible • Strategies to avoid or minimize these effects will be considered during the Atlanta BeltLine Subarea Master Planning process and Tier 2 analysis
Neighborhoods and Community Facilities[1]		
	• Limited accessibility impact on neighborhoods and community facilities in study area • Would serve only the study area neighborhoods that are crossed, leaving large geographic areas that would not be served • Would not provide recreational space • Would not remove the barrier created by the existing rail corridors in the study area	• Increases regional access for neighborhood residents • Up to 61 neighborhoods served and up to 71 community facilities accessed • Trail will provide recreational space • Trail will remove existing barrier between neighborhoods currently divided by the railroad ROW
Socioeconomics and Environmental Justice[2]		
Socioeconomics	• Incremental growth and development both within and outside the study area • ½ - mile service area of proposed transit station locations will contain an estimated 79,874 people in 2030 • ½ - mile service area of proposed transit station locations will contain an estimated 80,474 jobs in 2030	• Will complement and support the projected population, employment, and household growth • ½ - mile service area of proposed transit station locations will contain an estimated 137,940 people in 2030 • ½ - mile service area of proposed transit station locations will contain an estimated 116,799 jobs in 2030 • Creates 30,000 new full-time jobs; 48,000 year-long construction jobs; and 28,000 new housing units including 5,600 affordable units over its 25-year Project span
Environmental Justice	• Improved transit service for some environmental justice (EJ) populations relative to the existing conditions • In 2000, ½ - mile service area of proposed transit station locations contained 5,850 zero-car households; 3,777 older adults; 9,368 disabled people; 11,700 low-income; and 28,272 minority people	• Improved transit service for some EJ populations, improving mobility and access to employment • In 2000, ½ - mile service area of proposed transit station locations contained 10,079 zero-car households; 8,005 older adults; 18,724 disabled people; 21,784 low-income households; and 59,864 minority people • Market pressures on low-income housing may be offset by existing affordable housing programs and City policy to protect single-family homes • Noise and vibration impacts will affect all residents in the southeast and southwest, including EJ populations. • Further analysis during Tier 2 to determine severity of impacts and mitigation measures

	No-Build Alternative	Preferred Transit and Trail Alternatives
Visual and Aesthetic Resources*		
	• No affect to existing viewshed • Infrequent maintenance of ROW vegetation has created an unsightly overgrown condition • Where vegetation or other screening is absent, views of railroad materials such as piles of ties or occasional dumped trash can also be observed	• New visual elements including new track and ballast, bridges, underpasses, power stations, poles and overhead wires, stations, storage yards, and trail signage, lighting, and furniture • Improves visual aesthetics of deteriorated elements • Currently obscured Railroad may be visible • Signage and warning indicators will be visible at at-grade crossings • The Trail will create new views, such as parks and historic structures • Detailed analysis as part of Tier 2 will evaluate impacts and suggest best management practices
Cultural, Historic, and Archaeological Resources+		
Section 106 and Preliminary Section 4(f) Statement	• Potential for cultural resource impacts would be highly localized and determined during required review process • Potential use of Section 4(f) properties possible by planned transportation improvements, such as the I-20 East BRT, Memorial Drive BRT, and the Commuter Rail-Lovejoy/Griffin/Macon project, which cross the Historic Rail Resources of the Atlanta BeltLine.	• 105 total resources have the potential to be impacted by the Preferred Transit Alternative, and 103 by the Preferred Trail • Direct impacts to the Historic Resources located within the Atlanta BeltLine study area • 39 archaeologically sensitive sites in study area • Tier 2 analysis will report unavoidable impacts. Continued consultations with Georgia State Historic Preservation Office (SHPO) to identify mitigations and prepare a Programmatic Agreement
Parks and Recreational Resources+		
Preliminary Section 4(f) Statement	• Provides no new acres of park access in study area • Lovejoy Commuter Rail has the potential to affect Adair II Park, and the I-20 East BRT has the potential to affect Rawson-Washington Park	• No direct use of public parks, recreational areas or wildlife refuge areas per Section 4(f) • Provides over 50 acres of park access • Provides connectivity between park activity centers, and between residences and park resources • Provides a transit option to access 22 existing parks and recreational facilities • Positive effect on future park and recreation facilities
Safety and Security*		
	• Requires existing safety and security protocols, such as compliance with American Association of State Highway and Transportation Officials (AASHTO) and Americans with Disabilities Act, or the control of roadway-track interactions for at-grade crossings, and measures in operation for existing transportation services	• Potential for pedestrian conflicts with transit, roadways, and pedestrian security along the trails • Shared ROW with existing freight rail will require appropriate horizontal and vertical clearances between freight rail, streetcar, and trail modes • Tier 2 analysis will identify needs and strategies for safe trail, station, roadway-track interactions, and freight rail-track interactions
Contaminated and Hazardous Materials*		

	No-Build Alternative	Preferred Transit and Trail Alternatives
	• Subject to the U.S. Environmental Protection Agency (USEPA) and Georgia Environmental Protection Division (GEPD) requirements for identifying and managing any contaminated or hazardous material sites	• 187 Recognized Environmental Condition REC sites are within the 300-foot study area for the Preferred Transit Alternative; of these 13 sites have the potential of being directly impacted • 166 REC sites within the 300-foot study area for the Preferred Trail; of these 13 sites have the potential of being directly impacted • 10 Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)-related sites are within the 300-foot study area for the Preferred Transit and Trail Alternatives; only 2 of these have the potential for direct impact • A survey of hazardous material will be completed prior to demolition or renovation of an identified structure, and will include abatement measures • Required subsequent activities include Phase I and Phase II Environmental Site Assessments, removal of underground storage tanks where necessary, development of remedial strategies, and coordination with GEPD
	Utilities*	
	• The sponsors of the No-Build projects will be responsible for identifying utilities and addressing potential conflicts	• Low potential for utility relocations along rail ROW • High potential for utility relocations along street • Moderate potential for utility relocations south of CSX rail ROW • High potential for utility relocations along the west of Peachtree Street • Potential impacts to water/sewer lines under CSX ROW connecting to the Atlanta City Water Works • Unavoidable relocations will be coordinated with the utility owners to minimize disruptions
	Air Quality*	
	• Improves local and regional air quality through improvements to the existing bus, rail, and roadway networks	• Reduction in vehicular emissions; reduction should offset incremental emissions increase from off-site electricity generation • The Preferred Trail will contribute no new emissions • Does not require a formal conformity determination on a regional level and, therefore, will not have air quality impacts for the nonattainment pollutants
	Noise and Vibration*	
	• Noise and vibration levels in the portions of the study area will be similar to those under the existing conditions	• 155 residences within noise screening distance and 113 residences within vibration screening distance in the northwest zone • A detailed noise and vibration analysis will take place during the Tier 2 analysis
	Energy*	
	• Travel time-savings of 79.8 million vehicle miles. Energy savings of approximately 497 billion British Thermal Units (BTUs) annually	• Travel time-savings of 145.2 million vehicle miles. Energy savings of approximately 905 billion BTUs annually
	Water Resources*	

	No-Build Alternative	Preferred Transit and Trail Alternatives
	• Potential to directly affect study area water resources	• No effects on wetlands, open water bodies, or sole source aquifers • 11 potential stream impacts from transit, 4 from trail • 1.17 acres of potential stream impact from transit, 0.52 acres from trail • Affects to floodplains associated with stream crossings • 16 acres of new impervious surface from transit, 7.2 acres from trails increasing stormwater runoff • Adjustments to alignment and amenity location to be determined during Tier 2 analysis
	Biological Resources*	
	• Potential to affect study area biological resources	• Potential impact associated with stream impacts, new street trees, and landscaped areas • Cleared vegetation could remove invasive plants, which could increase the diversity of native vegetation • Could change or eliminate the species composition currently using the habitat • No affects to protected species or species or habitat protected by the Migratory Bird Treaty • During Tier 2 analysis, design to be refined to avoid or minimize impacts as prescribed by resource protection regulations, including NEPA
	Geologic Resources*	
	• Would be the subject of an environmental assessment for each project	• Minimal potential effects on geology, topography, and soils • Extension of existing tunnel near Inman Park MARTA rail station, and the cut near Piedmont Park will require geotechnical survey • Geotechnical analysis to occur during Tier 2 analysis to identify minimization and mitigation strategies
	Potential for Secondary Effects*	
	• May include development of underdeveloped land near proposed transit station locations. This development, should it occur, may also result in changes to population, employment, and community facilities and services	• Secondary effects will be focused around proposed station areas, taking the form of development that will likely result in changes in population, employment and community facilities and services • Tier 2 analysis will identify specific secondary effects
	Potential for Cumulative Effects*	
	• Potential for cumulative effects on ROW, historic resources, parks, hazardous materials, noise, streams, and water quality (due to increases in impervious surfaces)	• Potential impacts on ROW, historic resources, parks, hazardous materials, noise, streams, and water quality (due to increases in impervious surfaces) • Tier 2 analysis will identify likelihood of, and appropriate mitigation for potential cumulative effects

*: Resources marked with a star (*) indicate those evaluations meeting the federal regulations set forth by the National Environmental Policy Act, Federal Transit Laws, SAFETEA-LU, and Executive Orders indicated in the "Pursuant To" section on the signature page of this document.

+: Resources marked with a plus (+) indicate those evaluations meeting Section 106 of the National Historic Preservation Act and Section 4(f) of the USDOT Act. Formal Section 106 consultation and Section 4(f) evaluation will continue during Tier 2 analysis.