February 11, 2014

Proposed SR 20 Improvements from Canton to Cumming
Projects STP00-0002-00(862), STP00-0003-00(681), STP00-0003-00(682)
P.I. Nos. 0002862, 0003681, 0003682, Cherokee and Forsyth Counties
www.dot.ga.gov/sr20improvements

Re: Responses to December 2013 Public Information Open House Comments

To the stakeholders of SR 20 between Canton and Cumming:

Thank you for your comments concerning the proposed project to improve State Route (SR) 20 between Interstate (I)-575 in Cherokee County and SR 400 in Forsyth County. Please understand we are early in the process and there will be multiple opportunities to provide feedback as we narrow down the alternatives to arrive at a final solution. The Georgia Department of Transportation (GDOT) appreciates your participation and all of the input that was received as a result of the December 10 and 12, 2013 Public Information Open Houses (PIOHs) as well as provided through the project and MetroQuest survey websites. All comments received will be part of the official record of the project.

A total of 532 people attended the PIOHs (259 in Ball Ground and 273 in Cumming) and 6,707 visits to the MetroQuest survey website were made. Of the 1,997 respondents who submitted a formal comment as of January 13, 2014, the distribution was as follows:

- 158 paper comment forms,
- 28 court reporter comments,
- 16 letters,
- 36 email comments,
- 1 petition (with regards to opposing the southern bypass alternatives in the Ducktown area), and
- 1,767 visitors left feedback via the MetroQuest website, which includes 241 visitors who left written comments via the MetroQuest website.

Several individuals submitted multiple comments, which accounts for a difference in the number of respondents and the total number of responses received. Additionally, many visitors to the PIOHs and MetroQuest website provided map-based input or survey data on areas of concern or community facilities, which are counted toward the ‘feedback’ category in the bullets above. Written comments via MetroQuest are those in which typed comments were provided. All input received during and after the formal comment period has been added to a database of locally important areas to help the project team better understand the issues and guide their development of solutions.

This response letter addresses all comments received so that everyone who has expressed interest in the process can be informed regarding all concerns raised and the responses provided. The comments have been consolidated into the following categories: GDOT Project Development Process and Schedule, Public Involvement, Need and Purpose (e.g., Mobility and Truck Considerations), Potential Impacts (e.g., Environmental, Community Feel, and Real Estate), Alternatives (e.g., Alignments, Rerouting, Bypasses, and Medians), Bike/Pedestrian Accommodations, Roundabouts, and Next Steps. This response letter is organized by category with a paraphrased citizen’s comment or question included in bold, followed by our response.
1. **GDOT Project Development Process and Schedule:** How will the decision be made? What is the project schedule? Solutions are needed now.

We’ve initiated the process of evaluating different improvement strategies and alternatives in accordance with state and federal requirements. Because Federal funds will be used for this project, GDOT, in partnership with the Federal Highway Administration (FHWA) must follow the National Environmental Policy Act (NEPA) requirements to identify a solution for the corridor.

Currently, the project is in the Alternatives Screening phase of the NEPA process, where we must first identify a full range of alternatives that can potentially address the identified Need and Purpose along SR 20, which is to improve mobility, reduce congestion, and improve safety. Then, we narrow those potential solutions based on performance and environmental criteria as well as the potential to avoid or minimize impacts to resources. Our current step in the process is Screen 2, where we evaluate these alternatives for performance as well as impacts to the natural (protected species, ecological, water quality, etc.), social (such as residences, businesses, churches, etc.), cultural (history, archaeology, etc.), and physical (air, noise, hazardous waste, etc.) environment. We will present the results of Screen 2 for each alternative to the public in the spring or summer of 2014. At that time, we will consider the technical analyses and public input to narrow these alternatives evaluated during screening and develop the reasonable range of alternatives that will be carried forward for further evaluation in the Draft Environmental Impact Statement (DEIS).

The detailed environmental evaluation in the DEIS will assess how the reasonable range of alternatives avoid, minimize, and mitigate impacts to natural, social, cultural and physical resources while meeting the Need and Purpose of the project. The DEIS is a multi-year process, which is expected to be completed in 2016. Stakeholders, the public, and the partner agencies will all provide feedback to inform the decision. There are many opportunities to get involved in the process. You can learn more by reviewing the Public Involvement Plan on the project webpage [www.dot.ga.gov/sr20improvements](http://www.dot.ga.gov/sr20improvements).

In summary, the schedule is as follows. During 2013-2014, the screening of alternatives is being evaluated. During 2014-2016, detailed environmental analysis will be conducted on the reasonable range of alternatives through the DEIS. Once the DEIS has been drafted and reviewed by the agencies in 2016, it will be brought to the public and the Citizen Advisory Committee (CAC) for input. Public involvement opportunities are afforded throughout the NEPA process at project milestones. The Final EIS and Record of Decision (ROD) are anticipated in 2018. The ROD represents the final decision of the selected alternative. At that point we can complete the design and begin acquiring right of way. Construction activities are anticipated to begin in 2020 and beyond.

2. **Public Involvement:** How can the public find out about the project and meetings?

The project website provides access to information about the project and is updated with opportunities to get involved. You can also use the website to contact the Project Manager and request more information. We maintain a project database which we will use to email meeting announcements and project materials, such as newsletters, to those who have provided comments or who have requested to be informed about the project. If you are receiving this letter and have provided your contact information, you are now a part of the database. Additionally, information will be provided periodically to the media to notify the public of project updates.

To navigate the project website noted above, select **View Website** under the I-575 to SR 400 (Canton/Cumming) section. Then navigate to the bottom of the page under the section **Project Information**. Here you will find our current documents. Some of these documents will change from time to time as the project develops and updates are appropriate for effectively completing this project.

The SR 20 Improvements Public Involvement Process has been a priority since the project kicked off in early 2013. We developed a Public Involvement Plan that is available for review and download from our project website. We encourage you to review the document, as it outlines the full scope of activities for this process. The latest version is available here:

3. **Need and Purpose:** A project is needed to relieve traffic and provide safety. Why does this project overlap with the I-575 and Scott Road project?

As documented in the Need and Purpose Statement, available for review at [www.dot.ga.gov/sr20improvements](http://www.dot.ga.gov/sr20improvements), this project is needed due to unacceptable levels of congestion; high crash, injury and fatality rates; and limited mobility for east/west travel movements between Canton and Cumming. Although a project is currently underway for the segment of SR 20 between I-575 and Scott Road, it is scheduled to advance ahead of the proposed project between I-575 and SR 400. To ensure a full range of options that could address the Need and Purpose are evaluated, the corridor between I-575 and SR 400 is being considered.

4. **Need and Purpose:** Mobility - There needs to be a limited access east/west corridor north of the area. There needs to be an I-75 to I-85 corridor.

The proposed project must address the Need and Purpose identified for the SR 20 corridor within the study termini of I-575 and SR 400. The Need and Purpose of the SR 20 Improvements Project (available at [www.dot.ga.gov/sr20improvements](http://www.dot.ga.gov/sr20improvements)) identifies improvements to east/west mobility between I-575 and SR 400 as one of the project objectives under the need **Improve Mobility for People and Goods.** A limited access corridor that may potentially address this need is part of the initial universe of alternatives that is currently under evaluation. Additional information is available in the Alternatives Analysis Methodology and the Screen 1: Fatal Flaw Strategy Screen Technical memorandum available for review at [www.dot.ga.gov/sr20improvements](http://www.dot.ga.gov/sr20improvements).

5. **Need and Purpose:** Truck Considerations - How will truck traffic be addressed?

Although many comments were received about the preference for trucks to be removed from SR 20, this corridor is an arterial designated to accommodate trucks. There are many studies and documents to provide support for accommodating truck traffic along SR 20 corridor between I-575 and SR 400, which are outlined in the project Need and Purpose. As such, the Alternatives Analysis Screen 2 evaluation will analyze the performance of all alternatives for multiple criteria, which specifically addresses trucks and passenger vehicles. The results of the Screen 2 Alternatives Analysis will be presented in the next public meeting and available on the project website at [www.dot.ga.gov/sr20improvements](http://www.dot.ga.gov/sr20improvements).

6. **Potential Impacts:** Environmental - How will the project account for potential impacts of the proposed project? Consider these types of impacts: residential/business displacements, communities (including schools, neighborhoods, old family lands), consistency with local land uses, change in number/location of SR 20 access points, farmland, rural/natural feel of the area, noise, potential for new congestion, emergency management services, utilities, historic areas, ecological resources, and cemeteries.

GDOT strives to balance the need to move vehicles in a safe and efficient manner with quality of life issues. As part of the NEPA process, the team must document the potential impacts to natural, social, cultural, and physical resources and evaluate them in detail. We will work toward developing solutions that meet the needs of the traveling public while avoiding, minimizing, and mitigating impacts to the environmental resources along the corridor including:

- Natural (e.g., wetlands, streams, farmland, protected species, environmental permitting);
- Social (e.g., economics, social and community assessment [neighborhoods, subdivisions, community infrastructure [including schools and emergency management services]], churches, businesses, institutions, and commercial or residential displacements);
- Cultural (e.g., historic properties, cemeteries, Native American interests, and archaeological findings); and
- Physical (e.g., air quality, noise quality, hazardous material involvement, utilities).
The coordination for land use planning is being conducted with the planners at the cities of Canton and Cumming, and Cherokee and Forsyth counties. These localities are also serving on the project’s Technical Advisory Committee in the role of evaluating the consistency between the local land use and zoning plans and the proposed design alternatives.

For more on the FHWA NEPA process, visit [http://environment.fhwa.dot.gov/projdev/](http://environment.fhwa.dot.gov/projdev/)

7. **Potential Impacts: Community Feel** - Please keep in mind this is a rural area and the aesthetics and community feel are important.

We understand that the look and feel is of significant importance to the local residents and as such we reach out for feedback to understand how to best design to complement the area. While our goal is to provide a facility that meets the needs of the traveling public, how we make this facility fit into the local community is important to us and requires understanding your priorities. We pledge to follow GDOT’s Context Sensitive Design (CSD) Policy to ensure that the transportation investments create the greatest value possible within the community. Please look for future opportunities to continue to work with us as we engage the community in decisions once project alternatives are identified and begin to advance to design. Aesthetics and visual impacts of the landscape will be evaluated for each alternative advancing for analysis in the DEIS (as referenced in the Environmental Methodologies Memo on the project website: [www.dot.ga.gov/sr20improvements](http://www.dot.ga.gov/sr20improvements)).

8. **Potential Impacts: Real Estate** - Now that these alternatives have been shown to the public, do we need to disclose this project when listing properties for sale?

Property owners should consult with their real estate agent for information regarding what needs to be disclosed to prospective buyers. However, as discussed above, the NEPA process requires the evaluation of a range of alternatives, including a No Build or ‘No Action’ (do nothing) alternative. Since it is very early in the evaluation process, it is premature to assume which alternative will advance and this information could also be disclosed to prospective buyers.

9. **Alternatives: Alignments** - The following are needed: an east/west highway; widening to 4-lanes; a new location/outer perimeter; turn lanes, signal timing, and widening improvements in addition to a new location freeway; or a 3-lane roadway like in Cherokee County.

The Alternatives Analysis and NEPA process require an evaluation of a full range of alternative solutions that address the project’s Need and Purpose. We begin by identifying the full range of alternatives, then narrow these down based on a quantitative and qualitative screening analyses. We have developed initial alternatives ranging from minor improvements of the existing route, such as adding turn lanes and optimizing signal timing; to providing additional through lanes; to the development of new location access controlled freeways. Each alternative will be evaluated based on the Screen 2 criteria to determine performance and levels of impact. This process is currently underway as part of Screen 2 and the results will be presented to the public in the spring or summer of 2014. To review the alternatives displays from the PIOH, the virtual PIOH, and display boards, please view the project website under [Public Information Open House (December 2013)](http://www.dot.ga.gov/sr20improvements) or the [Fatal Flaw Strategy Screening](http://www.dot.ga.gov/sr20improvements) (Screen 1 analysis) located under Project Information at: [www.dot.ga.gov/sr20improvements](http://www.dot.ga.gov/sr20improvements).

10. **Alternatives: Rerouting Options** - Could SR 369 or Bethelview Road be used for rerouting of SR 20?

Yes, these are potential rerouting alternatives. As a result of this suggestion, we have added alternatives which would consider rerouting SR 20 onto SR 369 and also one that considers rerouting onto Bethelview Roads to our Screen 2 evaluation. We will present the results of these alternatives at the next public meetings in the spring or summer of 2014, as well as on the project website.
11. **Alternatives: Bypasses** - How do bypasses work?

Bypasses offer benefits such as providing additional lanes of traffic to improve mobility and traffic flow around congested areas while maintaining access and providing a performance benefit for those traveling on the existing facility. This may improve performance while avoiding and/or minimizing impacts to residents, businesses, and other resources along existing SR 20.

The bypass alternatives were developed as an alternative to the widening of existing SR 20 in areas that are heavily developed or in areas where widening may encounter a significant number of impacts to environmental resources. The intent is to find an alternative location that would provide fewer accumulated impacts. NEPA law requires us to avoid impacts to environmental resources and then when not possible, to minimize impacts and provide mitigation for those impacts.

The bypasses could be developed in one of two ways. One possibility is to divert SR 20 onto these new location bypasses and then tie back into existing SR 20. The existing SR 20 in these bypass locations would become a local road. The second type of bypass would be to create a one-way pair whereby existing SR 20 would handle traffic flowing in one direction and the bypass would handle the traffic flowing in the opposite direction. This would minimize the footprint since the new roadway would only need to be wide enough to accommodate the volume of traffic flowing in one direction. This in turn could reduce impacts and costs. The one-way pair bypass alternative would need to consider accommodation of access to the properties in the affected area using north/south connector roads and u-turns at the beginning and end of these one-way pair bypasses. These details would be developed in a later phase of the project during the DEIS phase and would involve seeking public input on viability, location of access points, and other considerations.

12. **Alternatives: Medians** - What are the pros and cons of the different types of medians?

Once we identify the alternatives that will advance into the DEIS, we will begin to focus more on design details, including the types of median options. Divided highways with depressed or raised medians provide substantial improvements to traffic flow and safety to the traveling public. Medians do carry increased construction and maintenance costs when compared to undivided highways. The current and projected traffic volumes, high-rate of speed, and high-rate of accidents along SR 20 indicate that medians would likely improve the safety and traffic flow of the corridor; thereby justifying the costs associated with their construction and operation.

Hardscaped or paved medians are typically utilized in areas where environmental considerations constrict the roadway footprint or right-of-way costs are high. These medians provide similar safety and operational improvements within a smaller footprint than a depressed median; however, maintenance cost is higher and in most cases, there is a lower posted speed limit. Newer construction techniques and materials have improved the look and feel of these medians, when constructed in the appropriate areas.

Landscaping in the median provides several benefits over grassed or paved medians. These benefits range from reducing the glare from on-coming traffic, reducing stormwater pollution, and improving aesthetic appeal and community character. A variety of landscape options assist in providing a unique visual sense of place however, there are limitations of what can be used based on safety considerations. These benefits can also come at an increased maintenance cost to GDOT or the local community.

Guardrail is typically installed in narrower depressed medians to reduce or prevent impact with stationary objects such as poles, trees and drainage features, as well as serving as a barrier between on-coming traffic, and to prevent encountering unrecoverable slopes. These protective barriers carry high construction and maintenance costs and are typically seen as an eye-sore when compared to providing a wider median.

Both raised medians (with curb and gutter) and depressed medians collect storm water in order to reduce the potential for hydroplaning on roadways. Raised medians typically convey water via underground pipes, while depressed medians convey water via open ditches that are then piped to the outside ditches and conveyance systems. Typically, the maintenance and construction cost associated with raised medians is higher than that of depressed median, as they require complex underground drainage systems.
At this stage in the design process, we are still at a very rough conceptual level and have not made decisions regarding specific design details. We have gathered initial ideas from the public on the types of details they might like to see. As we narrow the alternatives, we will also develop more detail in our design including the design of the medians.

13. **Bike/Pedestrian Accommodations:** The project needs to balance bike and pedestrian accommodations with minimizing overall impacts and should be applied in a safe and context sensitive manner.

The GDOT has adopted a Complete Streets policy that emphasizes safety, mobility, and consideration of accessibility for all modes of travel (including pedestrians, bicyclists, transit riders, and motorists) and individuals of all ages and abilities during the design of transportation projects. Therefore, the design approach will consider a “balance” across modes as appropriate to the type of roadway and context within the SR 20 project area.

We have received a mix of comments both for and against bicycle lanes along SR 20. According to the Georgia Statewide Bike Map (2010), SR 20 is not currently designated as a state bicycle route. Cherokee County does not have a bicycle and pedestrian master plan. However, the City of Canton has a master plan, accommodating bicycle and pedestrian connections from the downtown area to commercial and residential neighborhoods within the city limits, which extends into the SR 20 study area just east of I-575 for approximately 2000 feet. The Forsyth County Bicycle Transportation and Pedestrian Walkways 2025 Plan identifies SR 20 through Forsyth County as a proposed sidewalk route. Phase 5 of the Big Creek Greenway, a multi-use trail (accommodates pedestrians and bicycles) generally traveling north and south, is also planned to cross over as well as utilize a portion of SR 20 west of Sawnee Mountain Preserve in Forsyth County.

We have heard from some residents that the bike lanes (paved shoulders signed as bike lanes) installed as part of the recently completed passing lanes project of SR 20 in Cherokee County were a poorly conceived idea. However, due to GDOT’s *Complete Streets Policy*, bicycle accommodations must be considered on facilities where evidence of bicycle traffic exists. Additionally, it is GDOT policy to identify all 6.5’ wide paved shoulders as bike-able shoulders. We will continue to consider alternatives that try to accommodate bicycles and pedestrians as we advance the design details. We look forward to a continued conversation with the public on these accommodations and their viability when weighed against needs and impacts.

14. **Roundabouts:** It would be good to look at roundabouts for intersections along the corridor. Roundabouts would not be a good idea.

Roundabouts provide a number of safety, operational, and other benefits when compared to other types of intersections. Specifically, they have fewer conflict points, lower speeds, and have been found to reduce the number and severity of crashes, fuel consumption, and air pollution in certain circumstances. It is current GDOT policy that roundabouts be considered as an alternative for all new intersections as well as for existing intersections that have been identified as needing major safety or operational improvements.

At this stage of the alternatives development, roundabouts have not yet been studied to determine viability or specific locations. As part of the Alternatives Analysis process (current phase), an initial, planning-level roundabout analysis will be performed to identify potential roundabout locations along existing SR 20 and will be included as part of the Alternatives Analysis results. As we get deeper into the process and begin to develop additional detail on the alternative designs, we will consider the viability of roundabouts at the intersections along SR 20 and along any alternatives that advance into the DEIS phase of consideration.

15. **Next Steps:** Where do we go from here?

As a result of the December 10 and 12, 2013 PIOHs we have summarized all feedback into a PIOH #2 Summary Report, which is available on the project website or by contacting the GDOT project manager. Over the next few months, we will complete Screen 2 of the alternatives by analyzing the performance and assessing the impacts of
the alternatives according to the Screen 2 criteria, as described at the December PIOHs and also described in the Alternatives Analysis Methodology document posted under Project Information on the project website. GDOT will continue to consult with the advisory committees throughout this process. We will hold additional public meetings in the spring or summer of 2014 to share the results of the alternatives screening process, as well as request more public input.

The GDOT values each comment received for this project. We hope you will continue to stay engaged throughout the design process and continue to provide feedback so we can develop the best solution for addressing the needs of this important state route while trying to fit into your local community. Our next opportunity for input is anticipated in the spring or summer of 2014. This will provide another opportunity to comment as the project advances. Should you have any further questions, comments, or concerns, please contact the GDOT project manager, Cynthia Burney, or email us at SR20Improvements@dot.ga.gov. Again, thank you for your observations and remarks. For project status updates, schedule information, information about our process, and other additional information, please visit the project website at: http://www.dot.ga.gov/sr20improvements.

Sincerely,

Glenn Bowman, P.E.
Acting State Environmental Administrator

GB/sp/ld

cc: Cynthia Burney, GDOT Project Manager
    Scott Gero, AECOM