

Russell R. McMurry, P.E., Commissioner One Georgia Center 600 West Peachtree NW Atlanta, GA 30308 (404) 631-1990 Main Office

March 24, 2020

Re: Responses to Open House Comments for PI Nos.: 0017125 (I-285 at Ashford Dunwoody Road Westbound Off-Ramp Extension), 0017126 (I-285 at Peachtree Industrial Road Interchange Improvements), 0017130 (I-285 Westbound Auxiliary Lane Extension), Fulton and DeKalb Counties, I-285 Top End Advanced Improvement Projects

Dear Sir or Madam:

Thank you for your comments concerning the proposed projects referenced above. We appreciate your participation and all of the input that was received as a result of the *January 21, 23, 28, & 30, 2020 Public Information Open Houses* (PIOH) for the I-285 Top End Express Lanes and Advanced Improvement Projects (AIPs). Every written comment received and verbal comment given to the court reporter will be made part of the projects' official records.

A total of **722** people attended the PIOHs. This response letter specifically addresses the I-285 Top End AIPs. Comments and input received for the I-285 Top End Express Lanes project (PI No. 0001758) are being addressed in a separate response letter.

<u>PI No. 0017125 (I-285 at Ashford Dunwoody Road Westbound Off-Ramp Extension)</u>: Of the **49** respondents who formally commented on No. PI 0017125, **14** were in **support** of the project, **18** were **opposed**, **8** were **uncommitted**, and **9** expressed **conditional support**.

<u>PI No. 0017126 (I-285 at Peachtree Industrial Boulevard Interchange Improvements)</u>: Of the **42** respondents who formally commented on PI No. 0017126, **19** were in **support** of the project, **6** were **opposed**, **8** were **uncommitted**, and **9** expressed **conditional support**.

<u>PI No. 0017130 (I-285 Westbound Auxiliary Land Extension)</u>: Of the **60** respondents who formally commented on PI No. 0017130, **19** were in **support** of the project, **20** were **opposed**, **10** were **uncommitted**, and **11** expressed **conditional support**.

At the PIOHs, PI No. 0017125 was presented to the public as "I-285 Westbound Collector-Distributor Lanes". After further evaluation, the Georgia Department of Transportation (GDOT) made the decision to change the name of the project to more appropriately reflect the improvements being proposed. The proposed project, which has been renamed to "I-285 at Ashford Dunwoody Road Westbound Off-Ramp Extension", will provide the same improvements that were presented to the public. However, the design criteria for a ramp extension allows GDOT to investigate a reduced typical section and right-of-way impacts.

Provided below is a summary of the comments and/or questions received relating to the I-285 Top End AIPs. GDOT has prepared this one response letter that addresses all comments received so that everyone can be aware of the questions raised and the responses given. Please find the comments summarized below (in *italics*) followed by our response.

• Please provide noise and visual mitigation as part of these projects. We are particularly concerned about the Georgetown Historic District on the north side of I-285 between Ashford Dunwoody Road and Chamblee Dunwoody Road under PI No. 0017125 and the area between Roswell Road and Riverside Drive under PI No. 0017130, including during construction. Please also consider planting trees on the north side of I-285 between Ashford Dunwoody Road and Chamblee Dunwoody Road to provide a natural visual and noise barrier.

Other than concrete walls, what techniques will GDOT be using to decrease noise impacts? I'm interested in the contributions to noise levels from tires on pavement, (truck) engines, materials used at road joints and at bridges that could propagate or muffle sound. Are these panels oriented at right angles or some other incidence/reflection angles? What absorbent materials could be utilized? Please also consider building noise barriers with aesthetic value to offset environmental impacts and provide visual appeal.

PI Nos. 0017125 and 0017130 are classified as Type I projects under the Federal Highway Administration's (FHWA's) highway noise regulations. For these projects, a Noise Impact Assessment will be completed. This study will identify traffic-related noise impacts within the project limits and evaluate the reasonableness and feasibility of constructing noise abatement measures (including noise barriers) in areas exceeding FHWA's noise abatement criteria (NACs) and in accordance with GDOT's "Highway Noise Abatement Policy for Federal-Aid Projects."

The FHWA Traffic Noise Model (TNM 2.5) uses sound emitted from three sources: tire, engine and truck stack. The sound levels that are calculated for adjacent properties inside the noise study area are a combination of the three types of noise sources. If sound levels approach FHWA's allowable NAC threshold based on the type of land use adjacent to the roadway, up to four types of noise abatement may be considered. These four types of abatement measures include: acquisition of rights-of-way, traffic management, alteration of horizontal and vertical alignments, and structural barriers (noise barriers) that are found to be reasonable and feasible. If a noise abatement measure is found to be reasonable and feasible in the area of a property/community, a meeting is held with the community during the final design process to determine the community's desire for such abatement. Final location and design of noise abatement measures would be determined by the Design-Build contractor during final design.

Noise abatement measures, where determined to be reasonable and feasible, are not typically installed at the beginning of construction and are proposed at either the future roadway shoulder edge or at the proposed right-of-way line, depending on the road design. Noise abatement measures that are built next to the edge of the proposed roadway require construction sequencing where the abatement measure is placed last because the roadway needs to be built first. The final location and orientation of a noise barrier is designated based on the spatial relationship between the noise source (highway) and the receivers that are located behind the noise barrier.

As a result of the noise analysis, reflections amongst parallel noise barriers may be determined. This additional analysis, called a Parallel Barrier analysis, may be completed to determine if reflections would increase impacts or result in loss of noise reduction. If reflections increase, absorptive materials may be considered for one or both noise barriers in a parallel barrier scenario.

The GDOT right-of-way is maintained to facilitate site distance, clear zone requirements, and safety considerations, which may require the removal of trees. Multiple activities could occur in

this right-of-way as part of routine maintenance or during construction, including staging areas, utility maintenance/relocation or other infrastructure needs. Replanting trees within the right-of-way after construction would not meet GDOT's clear zone requirements and would pose safety concerns to motorists. More information on GDOT's clear zone requirements can be found in GDOT's Design Policy Manual, Chapter 5, Roadside Safety and Lateral Offset to Obstruction (available at: http://www.dot.ga.gov/PartnerSmart/DesignManuals/DesignPolicy/GDOT-DPM.pdf). Additionally, trees and other vegetation must be high enough, wide enough, and dense enough that they cannot be seen through in order to audibly reduce noise, and typically vegetation provides more of a perception of noise reduction than an actual noise reduction that is audibly perceptible to the human ear. Therefore, it is not considered a noise abatement/reduction option by the FHWA.

Concrete is the preferred material for use in noise barrier construction; however, other materials can be considered depending on the circumstances. GDOT would coordinate these details with the community during the voting process associated with noise barrier construction. Typically, GDOT proposes ashlar finish on noise barriers to reduce visual impacts.

I am concerned about significant flooding and water runoff, specifically in the areas of I-285 near Lake Forrest Drive and along I-285 between Ashford Dunwoody Road and Chamblee Dunwoody Road. I am also concerned that the overall construction and expansion of roadways is impacting watersheds, specifically Nancy Creek, Long Island Creek, and the Chattahoochee River. What stormwater devices are proposed for these areas? What environmental impact studies will you have in place to ensure these watersheds are not polluted as a result of this roadwork?

The roadway's drainage design would be brought to current standards, where possible, as part of the overall design process. The I-285 Top End Express Lanes Project and AIPs must comply with GDOT's Municipal Separate Storm Sewer System (MS4) permit, which includes incorporating permanent water quality control and detention measures, or best management practices (BMPs), into the design where appropriate, where those BMPs have not been determined to be infeasible. Criteria to determine BMP feasibility includes: stormwater management and treatment requirements; safety to motorists, GDOT maintenance staff, and the general public; site constraints such as available right-of-way, soil type within the project area and topography; the cost associated with operating the BMP; special watershed or stream considerations; and maintenance challenges. A more detailed list of post-construction stormwater BMP selection criteria can be found in Chapter 10 of the GDOT Drainage Design for Highways Manual (http://www.dot.ga.gov/PartnerSmart/DesignManuals/Drainage/Drainage%20Manual.pdf). The results of this infeasibility analysis will be documented in a Post-Construction MS4 Infeasibility Study.

Specifically in the areas of I-285 near Lake Forrest Drive and along I-285 between Ashford Dunwoody Road and Chamblee Dunwoody Road, several post-construction BMPs are planned or are currently being constructed in compliance with GDOT's MS4 permit as part of GDOT's adjacent Transform 285/400 project (PI Nos. 0000784, 0013546, 721850). Most of these BMPs are flood control devices that are intended to benefit Long Island Creek and Perimeter Creek. For more information on this project, including the proposed BMPs, please call the Transform 285/400 hotline at (404) 609-4609 or email transform 285400@dot.ga.gov.

 I am concerned about the aesthetics of these projects. Please encourage and educate local communities about their options for landscaping and other beautification enhancements to soften the vast amount of concrete the public will be seeing.

GDOT is open to including locally funded aesthetic features into the project design, where feasible. The exact nature of any aesthetic enhancements, including types and locations, would need to be approved through various GDOT offices, as well as the FHWA.

GDOT is actively working with local governments to determine where aesthetic features requested by the community could potentially be integrated into the design for of the projects.

• Is the Need and Purpose of PI No. 0017126 to reduce the project expense associated with the Top End Express Lanes Project? Please provide a link to the concept report for this project.

The Need and Purpose of PI No. 0017126 is to reduce the existing bottleneck from I-285 to northbound Peachtree Industrial Boulevard by improving the geometry of this ramp and to reduce conflict points along the westbound approach to this interchange. This project is independent of the I-285 Top End Express Lanes project, meaning that it would function and offer improvements as a stand-alone project, with or without the construction of the Express Lanes.

The project's Concept Report and any associated revisions will be available on GeoPI once approved (http://www.dot.ga.gov/DS/Maps/geopi). We anticipate that these documents will be available Fall of 2020.

• Please use the funds for MARTA expansion and other public transit options, such as BRT, or consider including a public transit component as part of the proposed projects. I am concerned that constructing new roads is not sufficient.

Thank you for your comment. The purpose of the AIPs is to provide safety and operational improvements to the I-285 general-purpose lanes. The AIPs are not project types that could accommodate the expansion or integration of public transit. Your comment has been provided to the I-285 Top End Express Lanes project team for consideration. We have also shared your comment with the MARTA Assistant General Manager for External Affairs, Mr. Virgil Fludd.

 Please use the funds to improve and maintain current infrastructure instead of building new roadways.

The goals of the AIPs are to improve current infrastructure and to enhance traffic operations along I-285. Improving and maintaining existing infrastructure is an effort to which GDOT will remain committed, while also supporting the overall expansion of the regional transportation system to meet growing population and travel needs.

- The following comments were received regarding the existing pedestrian crossing at westbound I-285 to northbound Peachtree Industrial Boulevard:
 - The at-grade pedestrian crossing at the westbound I-285 to northbound Peachtree Industrial Boulevard should be grade separated as part of PI No. 0017126. Please also install a sign indicating that there is a pedestrian crossing ahead on the exit ramp.

 Please remove the pedestrian crossing at the westbound I-285 to northbound Peachtree Industrial Boulevard and remove sidewalks to the south of the I-285 and Peachtree Industrial Boulevard Interchange. This area is too dangerous for pedestrians.

Thank you for your comments. The crosswalk at the westbound I-285 to northbound Peachtree Industrial Boulevard exit ramp does not meet current design and safety standards. Due to these safety concerns, the pedestrian crossing would be removed as part of the proposed project. Providing a grade-separated crosswalk is outside the scope of the project and can be considered if there is substantiated pedestrian presence; however, GDOT typically discourages pedestrian access along limited access highways.

• Please include a multi-use trail as part of the Chamblee Dunwoody Road over I-285 bridge reconstruction.

As part of the Chamblee Dunwoody Road over I-285 bridge reconstruction, GDOT is evaluating the design changes necessary to accommodate the installation of a multi-use trail that would be constructed parallel to the roadway along the bridge.

• When will the project be completed? I've been told 2032 as well as 2023.

Construction for the Top End AIPs (PI Nos. 0017130, 0017125, and 0017126), which are being delivered to provide operational improvements to the I-285 general-purpose lanes, would begin in 2021 (PI No. 0017126) and 2022 (PI Nos. 0017130 and 0017125), and are anticipated to be completed in 2024. More information about the project schedules for these as well as other projects within the Major Mobility Investment Program can be found at the links below.

Top End Express Lanes: https://majormobilityga.com/projects/topend/
Advanced Improvement Projects: https://majormobilityga.com/projects/eastside/
Eastside Express Lanes: https://majormobilityga.com/projects/westside/
State Route 400 Express Lanes: https://majormobilityga.com/projects/sr400/

• Please maintain all lanes of traffic during the bridge reconstruction at Chamblee Dunwoody Road over I-285.

The use of staged construction is currently being proposed for the replacement of the Chamblee Dunwoody Road bridge over I-285. Staged construction would minimize impacts to traffic and allow the bridge to remain open by partially removing and constructing portions of the bridge at different phases. Due to the width that would be required to keep all lanes open during construction and the desire to maintain the current road alignment, not all lanes would be able to remain open during construction at all times. However, lane closures will be confined to off-peak traffic hours to the greatest extent possible.

 A potential detour resulting from the replacement of the Mt. Vernon Highway bridge over I-285 will be very difficult and inconvenient. It is strongly desirable to keep the bridge open to traffic.

Thank you for your comment. Due to feedback received from the community during the PIOH, GDOT is evaluating options to keep the bridge at Mount Vernon Highway over I-285 open during construction.

• I believe that eastbound I-285 approaching Peachtree Industrial Boulevard needs improvements, not the westbound approach.

The Need and Purpose of PI No. 0017126 is to reduce the existing bottleneck from westbound I-285 to northbound Peachtree Industrial Boulevard by improving the geometry of this ramp and to reduce conflict points along the westbound approach to this interchange. Improvements to eastbound I-285 approaching this interchange are not within the scope of PI No. 0017126. However, District 7 will continue to monitor traffic conditions on eastbound I-285 approaching Peachtree Industrial Boulevard and evaluate if there are improvements that need to be made.

I am concerned about the signage and lead times at complicated interchanges.

Overhead signage would be installed as part of the proposed projects per the FHWA's Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD) guidance. The FHWA MUTCD defines the standards for traffic control devices and signage in order to provide adequate site distance for motorists to safely travel along all public streets and highways. Typically, advanced overhead signage alerting drivers of an available exit ramp starts approximately one mile in advance of the exit ramp. For major interchanges with highways and major state routes, advanced signage may be placed up to two miles in advance of the exit ramp. In addition, GDOT uses on-pavement markings at complex interchanges to aid motorists.

• I am concerned that forcing all northbound and southbound Peachtree Industrial Boulevard traffic onto a one-lane exit ramp would exacerbate congestion and that drivers will continue to make last-minute lane changes to exit.

I am also concerned that the traffic from westbound I-285 exiting to northbound Peachtree Industrial Boulevard will block the southbound Peachtree Industrial Boulevard exit. Please consider utilizing the Buford Highway on-ramp lane and allowing a two-lane exit ramp onto Peachtree Industrial Boulevard.

Thank you for your comment. Based on preliminary results of the traffic operational analysis being conducted for PI No. 0017126, GDOT has modified PI No. 0017126 to include a two-lane exit ramp (one dedicated exit lane and one optional exit lane) for the combined westbound Peachtree Industrial Boulevard exit instead of the one-lane exit shown at the PIOH. Traffic operations at this interchange from the proposed project design are still being evaluated. In addition, your comment has been provided to GDOT's District 7 Office and the GDOT Office of Traffic Operations for consideration.

• I am concerned that the addition of an auxiliary lane (PI No. 0017130) will make traffic worse along northbound Riverside Drive. Traffic currently backs up at the intersection of Riverside

Drive and Heards Ferry Road. We need more lanes (two in each direction) at the light so that the intersection can better handle the existing and future traffic.

As part of the proposed project, the Riverside Drive exit ramp would remain a one-lane exit and is not anticipated to affect the operation of the intersection at Riverside Drive and Heards Ferry Road. No additional capacity to the Riverside Drive exit ramp is being proposed; the purpose of the auxiliary lane is to improve merging traffic from Roswell Road onto westbound I-285. However, we encourage you to reach out to the City of Sandy Springs with any concerns regarding traffic at the intersection of Riverside Drive and Heards Ferry Road.

• Why is a CD lane not being considered along eastbound I-285 between Ashford Dunwoody Road and Chamblee Dunwoody Road?

Thank you for your question. Improvements to I-285 eastbound in this area are outside the scope of PI No. 0017125. Your comment has been provided to GDOT's District 7 Office and the GDOT Office of Traffic Operations who continuously monitor traffic conditions and assess the need for additional projects within this corridor.

 Please consider adding a dual left-turn lane from northbound Chamblee Dunwoody Road to westbound I-285. This area is often a bottleneck.

Thank you for your comment. Based on a review of design year (2044) traffic volumes for PI No. 0017125, a single left-turn lane servicing traffic from northbound Chamblee Dunwoody Road to westbound I-285 is sufficient to accommodate projected traffic volumes. Therefore, a dual left-lane is not proposed for this movement.

- The following comments were received regarding improvements to Peachtree Industrial Boulevard:
 - The existing exit ramps from westbound I-285 to northbound and southbound Peachtree Industrial Boulevard are both poorly constructed and very dangerous.
 - PI No. 0017126 should include a flyover from southbound Peachtree Industrial Boulevard to eastbound I-285.
 - The existing curve from eastbound I-285 to southbound Peachtree Industrial Boulevard is too sharp. Lights must be added so that people do not overshoot.
 - Please remediate the stop sign at the end of the loop ramp from westbound I-285 to southbound Peachtree Industrial Boulevard.

PI No. 0017126 proposes to flatten the existing horizontal curve and dip along the northbound exit ramp from westbound I-285, which would improve the geometry and operation of this ramp. The project also aims to reduce conflict points along I-285 westbound approaching this interchange. Improvements to other movements at this interchange are beyond the scope of this project; however, your comments have been provided to GDOT's District 7 Office and the GDOT Office of Traffic Operations for consideration.

 Based on the concept, the Chamblee Dunwoody Road bridge at I-285 would be replaced as part of the AIP and then the Savoy Drive-Cotillion Drive one-way pair would be constructed as part of the Express Lanes project. Since the one-way pair would provide another dedicated lane at Chamblee Dunwoody Road, please consider building this lane as part of the new bridge under the AIP to save time and money.

Thank you for your comment. The I-285 Top End Express Lanes project is still in the conceptual phases of design in this area. However, this comment will be evaluated during the development of both the AIP and Express Lanes projects, which will consider geometric design, environmental resources, right-of-way impacts, traffic studies, and construction staging.

Where would transmission lines carrying high voltage be moved if needed?

The current proposed alignments of both the Top End Express Lanes and the I-285 at Ashford Dunwoody Road Westbound Off-Ramp Extension would require the high-voltage Georgia Power transmission lines between Ashford Dunwoody Road and Chamblee Dunwoody Road to be relocated. Relocation alignments are currently being evaluated with Georgia Power, and no alignment has yet been selected.

• I am not convinced that it is necessary to take more property for the I-285 Westbound CD lanes to make the I-285 entrance ramp safer.

PI No. 0017125 proposes to extend the two-lane I-285 westbound exit ramp to Ashford Dunwoody Road constructed under GDOT's Transform 285/400 project (PI Nos. 0000784, 0013546, 721850) eastward to provide operational improvements and alleviate traffic congestion by reducing vehicular weaving and conflicts. The existing right-of-way may not be sufficient to implement these improvements and additional right-of-way may be acquired to accommodate the proposed project. However, the project team is currently evaluating changes to the proposed project to reduce impacts to adjacent properties while maintaining design and safety policies.

Again, thank you for your comments. Should you have further questions, comments or concerns, please call the Design-Build Program Manager, Andrew Hoenig, at 404-631-1757 or the environmental analyst, Kaelin Priger, at 404-631-1362.

To stay up-to-date with all of GDOT's public meetings, please visit the online calendar at http://www.dot.ga.gov/AboutGDOT/PublicOutreach.

Sincerely,

Eric Duff

State Environmental Administrator

ED/JN

cc:

Stacey Key, GDOT Board Member (District 5)

Kevin Abel, GDOT Board Member (District 6)

Matthew Wilson, State Representative (District 80)

Deborah Silcox, State Representative (District 52)

Sally Harrell, State Senator (District 40)

Jennifer Jordan, State Senator (District 6)

Andrew Hoenig, Design-Build Program Manager (via email)

Rick O'Hara, GDOT Project Manager (via email)

Anthony Tate, GDOT Project Manager (via email)

PDF for Project File