APPENDIX H-3

EVALUATION OF TOLLING EFFECTS ON LOW-INCOME POPULATIONS REPORT

May 2024

I-285 Top End Express Lanes

Cobb, Fulton and DeKalb Counties, PI 0001758

Disclaimer: *The Notice of Intent to prepare an Environmental Impact Statement for this project predates the 2022 updates to the Council on Environmental Quality regulations effective May 20, 2022.*

GDOT Georgia Department of Transportation

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Acronyms and Abbreviations

AADT	annual average daily traffic
ABM	Activity-Based Model
ACS	American Community Survey
ADA	Americans with Disabilities Act
AOI	Area of Influence
ATL	Atlanta-region Transit Link Authority
ARRA	American Recovery and Reinvestment Act
BRT	bus rapid transit
CRD	Congestion Reduction Demonstration
DAR	direct access ramp
EBT	Electronic Benefit Transfer
ECT	Environmental Commitments Table
EIS	Environmental Impact Statement
EJ	environmental justice
EL	express lane
EO	Executive Order
EPA	U.S. Environmental Protection Agency
FDOT	Florida Department of Transportation
FHWA	Federal Highway Administration
Georgia DOT	Georgia Department of Transportation
GP	general purpose
GSU	Georgia State University
HHS	Department of Health and Human Services
HOT	high-occupancy toll
I-285	Interstate 285
I-75	Interstate 75
I-85	Interstate 85
LOS	Level of Service
MARTA	Metropolitan Atlanta Rapid Transit Authority
MDX	Miami-Dade Expressway Authority
Metro	metropolitan
MMIP	Major Mobility Investment Program
NEPA	National Environmental Policy Act
NWC	Northwest Corridor
PI	project identification
PIOH	Public Information Open House

Proposed Project	I-285 Top End Express Lanes Project
SR	State Route
SRTA	State Road and Tollway Authority
TAZ	traffic analysis zone
TIFIA	Transportation Infrastructure Finance and Innovation Act
TxDOT	Texas Department of Transportation
UPA	Urban Partnership Agreement
USDOT	U.S. Department of Transportation

1. Introduction

The Federal Highway Administration (FHWA) and the Georgia Department of Transportation (Georgia DOT) have prepared this Draft Environmental Impact Statement (EIS) for the Interstate 285 (I-285) Top End Express Lanes Project (Proposed Project) under the National Environmental Policy Act (NEPA) of 1969. The Proposed Project would provide for reliable trip times through approximately 23.5 miles of the heavily traveled Proposed Project corridor, with connectivity to the existing express lanes (ELs) on Interstate 75 (I-75) and Interstate 85 (I-85) in the northern Metropolitan (Metro) Atlanta area. The Proposed Project is a part of Georgia DOT's Major Mobility Investment Program (MMIP).[1]

The Proposed Project corridor is approximately 23.5 miles. It extends approximately 19 miles along I-285 between South Atlanta Road (Exit 16) and Henderson Road, as well as approximately 3.5 miles of SR 400 from south of Glenridge Connector to the vicinity of the North Springs MARTA station, and approximately 1 mile of I-85 from I-285 to the vicinity of Pleasantdale Road.

The Proposed Project would provide congestion-priced express lanes (ELs) which would employ dynamic pricing to manage traffic conditions and to provide reliable trip times for commuters along the I-285 corridor. The FHWA and Georgia DOT must therefore identify, analyze, and address the potential for disproportionate and adverse tolling effects on low-income populations following the recently issued EO 14096 (April 21, 2023). Per CEQ directions, the new EO 14096 on EJ does not rescind EO 12898, which FHWA is implementing through the current DOT and FHWA EJ Orders (DOT 5610.2C and FHWA 6640.23A) until further guidance is provided regarding the implementation of the new EO on EJ. While the ELs would add new capacity and therefore provide travel time savings for users of both the ELs and general purpose (GP) lanes, the value given to travel time savings and trip reliability would determine utilization of the ELs.

The ELs are intended to provide a mobility choice for more reliable travel times for motorists and transit by offering the option of bypassing congestion by paying to use the lanes. Toll rates would be set to maintain a minimum average 45-mile-per hour speed for EL users, thereby providing reliable trip times for all users, including transit and vanpool users. As noted, congestion pricing is used to maintain reliable travel times in the ELs, especially during peak periods. While all income groups would benefit from the time savings and greater reliability for trips provided by the ELs, it is important to consider the impacts of tolling on low-income populations to ensure that equitable decisions are made to provide mobility choices to all users.

This analysis discusses the distribution of low-income and non-low-income populations for the proposed ELs along sections of I-285 and SR 400 referred to as the top end corridor; and how the proposed addition of ELs would affect low-income and non-low-income populations. This *Evaluation of Tolling Effects on Low-Income Populations Report* has been completed as part of the EIS, which will be available for public and agency review as part of the procedures under the National Environmental Policy Act (NEPA). The evaluation is part of an overall environmental justice (EJ)[2] approach to consider the potential effects and outreach needs for low-income and minority populations. The approach includes the following:

[1] Georgia Department of Transportation (Georgia DOT). n.d. "Major Mobility Investment Program." https://majormobilityga.com/.

[2] U.S. Department of Transportation (USDOT). 2016. "Environmental Justice Strategy." https://www.transportation.gov/transportation-policy/environmental-justice/environmental-justice-strategy.

- Additional measures to inform EJ populations about public involvement opportunities
- Assessment of potential for adverse effects including relocations, noise, community cohesion, local traffic, air quality, and water quality
- Assessment of access to the Proposed Project's benefits

The findings of this analysis are integrated into relevant sections of the EIS along with these additional EJ considerations as an overall assessment of the Proposed Project's potential effects on low -income and minority populations and other populations at risk.

1.1 Environmental Justice Guidance and Regulations

As defined by both the U.S. Environmental Protection Agency (EPA) and U.S. Department of Transportation (USDOT), EJ refers to the "fair treatment and meaningful involvement of all people, regardless of race, ethnicity, income, national origin, or educational level with respect to the development, implementation and enforcement of environmental laws, regulations, and policies."[3] The analysis described in this document was undertaken in accordance with the following executive order and implementation guidance:

- Executive Order (EO) 12898, *Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations*[4] states that: "To the greatest extent practicable and permitted by law, and consistent with the principles set forth in the report on the National Performance Review, each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."
- USDOT Order 5610.2(c) *U.S. Department of Transportation Actions to Address Environmental Justice in Minority Populations And Low-Income Populations*[5] is an update to Order 5610.2(a), identifying the policy and guiding principles to address EO 12898.
- FHWA *Guidance on Environmental Justice and NEPA Memorandum*[6] establishes policies and procedures for FHWA to use in complying with EO 12898. The guidance refers to the Department of Health and Human Services (HHS) poverty guidelines for the identification of low-income populations.
- EO 14096, *Revitalizing Our Nation's Commitment to Environmental Justice for All*[7] has been issued as an update and extension of EO 12098 with part of its stated policy being to "advance environmental justice for all by implementing and enforcing the Nation's environmental and civil rights laws,

[3] U.S. Environmental Protection Agency (EPA). 2022. "Learn About Environmental Justice." September. https://www.epa.gov/environmentaljustice/learn-about-environmental-justice.

[4] Executive Order No. 12898. 1994. Federal Actions to Address Environmental Justice in Minority Population and Low-Income Populations. Vol. 59, No. 32. https://www.archives.gov/files/federal-register/executive-orders/pdf/12898.pdf.

[5] U.S. Department of Transportation (USDOT). 2021. *Department of Transportation Order 5610.2(a). Department of Transportation Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*. May 16. https://www.transportation.gov/sites/dot.gov/files/Final-for-OST-C-210312-003-signed.pdf.

[6] Federal Highway Administration (FHWA). 2011. *Guidance on Environmental Justice and NEPA*. December. https://www.environment.fhwa.dot.gov/env_topics/ej/guidance_ejustice-nepa.aspx.

[7] Executive Order No. 14096. 2023. *Revitalizing Our Nation's Commitment to Environmental Justice for All.* Federal Register 88 FR 25251. https://www.federalregister.gov/documents/2023/04/26/2023-08955/revitalizing-our-nations-commitment-to-environmental-justice-for-all.

preventing pollution, addressing climate change and its effects, and working to clean up legacy pollution that is harming human health and the environment."

FHWA projects that involve proposed toll lanes require the evaluation of toll effects on low-income populations. This report provides an evaluation of the effects of tolling on low-income populations in an effort to identify any disproportionate and adverse effects as outlined in the regulatory framework described in this section.

1.2 Project Description

The Proposed Project would include barrier-separated ELs along the I-285 top end corridor and SR 400 as shown in **Exhibit 1-1**. To improve mobility on I-285, Georgia DOT plans to add new, optional ELs consisting of two at-grade or elevated, barrier-separated ELs in both directions of I-285 between South Atlanta Road and Henderson Road, and on SR 400 between the Glenridge Connector and the North Springs Metropolitan Atlanta Rapid Transit Authority (MARTA) Station in Cobb, Fulton, and DeKalb counties. The I-285 Top End ELs would be constructed in three phases as part of the Georgia ELs network and as one of the large-scale MMIP projects to improve transportation in Georgia's metro areas. System-to-system connections are proposed with existing EL systems at Interstate 75 (I-75) Northwest Corridor (NWC) and Interstate 85 (I-85) high-occupancy toll (HOT) lanes. The proposed number of ELs would be as follows:

- Along I-285, two ELs in each direction from the western project limit north of South Atlanta Road to the eastern project limit near Henderson Road
- Access ramps from the I-85/I-285 interchange extending approximately 1 mile on I-85 north to near Pleasantdale Road
- Along SR 400, one EL in each direction from south of the Glenridge Connector to the I-285/SR 400 interchange and two ELs in each direction from the I-285/SR 400 interchange to the North Springs MARTA Station

The Proposed Project would connect with the existing I-75 NWC ELs, existing I-85 HOT lanes, and the SR 400 EL project (project identification [PI] 0001757) which is under construction. The Proposed Project would improve connectivity between regional destinations through priced ELs that would integrate with the Georgia ELs network.

The Preferred Alternative would include a combination of direct merge ramps between GP lanes and ELs, and direct access locations to provide connections to and from major regional activity centers along the Preferred Alternative Corridor. The direct merge locations and direct access locations are shown in **Exhibit 1-1** for the Preferred Alternative.

1.3 Access Points

The Proposed Project would separate GP access from direct EL access points. Access points were determined using the following considerations: travel shed, topographic constraints, location of existing GP interchanges as well as non-access crossings and local roads, traffic volumes, and stakeholder input.

The EL access points are how the traveling public enters and exits the EL system. The EL access points would serve users accessing the I-285 top end corridor from or through cities along the Proposed Project corridor (e.g., Sandy Springs, Dunwoody, and Chamblee). Access points connect the cities' travel sheds from the north, east, and west to the proposed EL system, providing options for drivers (both non-low-income and low-income populations) and transit operators to access the benefits of the EL system such as improving trip reliability and

facilitating regional connectivity. Proposed direct access ramps and direct merge point locations are listed in **Exhibits 1-1** and **1-2**, with numbered labels to correlate the two exhibits.

Exhibit 1-1: Preferred Alternative Features and Access Points

Note: Exhibit 1-1 illustrates the project location, which has been refined throughout the study.

Exhibit 1-2: Proposed Access Points in Preferred Alternative

ID	Access Point	Type	Description
12	South Atlanta Road	Direct Merge	**GP/EL System Interface:** Provides access between the I-285 ELs and adjoining existing GP lanes at the western end of the I-285 EL facility
1	Cumberland Boulevard (I-285)	Direct Access	**Major Regional Activity Center:** Provides access from the EL systems on I-285 and I-75 to the Home Depot Support Center on Paces Ferry Road, the Cumberland CID, and the Cumberland Mall
14	I-75/I-285	EL System Interchange	**EL System Interchange:** Provides access between the EL systems on I-75 and I-285
9	Raider Drive	Direct Merge	**GP/EL System Interface:** Provides access between the I-285 GP lanes and I-285 ELs within the I-285 EL facility before transitioning to the adjacent EL systems
3	Mt. Vernon Highway (SR 400)	Direct Access	**Major Regional Activity Center:** Provides access from the Sandy Springs area to the EL network north of the I 285/SR 400 interchange and between the EL network and the northern end of the Perimeter CID
2	Johnson Ferry Road (SR 400)	Direct Access	**Major Regional Activity Center:** Provides access between SR 400 ELs and the Northside Hospital area.
15	I-285/SR 400	EL System Interchange	**EL/EL System Interface:** Provides access between the EL systems on I-285 and SR 400
13	SR 400 Terminal Ramps	Direct Merge	**GP/EL System Interface:** Provides access between SR 400 ELs and adjoining existing GP lanes at the southern end of the SR 400 EL facility
4	Perimeter Center Parkway (I-285)	Direct Access	**Major Regional Activity Center:** Provides access between I-285 ELs and the Perimeter CID
5	North Shallowford Road (I-285)	Direct Access	**Major Activity Center:** Provides access between I-285 ELs and the Chamblee Dunwoody CID
10	North Shallowford Road	Direct Merge	**GP/EL System Interface:** Provides access between the I-285 ELs and existing I-285 GP lanes and I-285 ELs within the I-285 EL facility before transitioning to the adjacent EL systems
6	Flowers Road (I-285)	Direct Access	**Major Regional Activity Center:** Provides access from the Doraville area to the westbound I-285 ELs and from the eastbound I-285 ELs to the Doraville area
7	New Peachtree Road (I-285)	Direct Access	**Major Regional Activity Center:** Provides access from the Doraville area to the eastbound I-285 ELs and from the westbound I-285 ELs to the Doraville area
16	I-285/I-85	EL System Interchange	**EL System Interchange:** Provides access between I-285 ELs and I-85 HOT lanes
11	Henderson Road	Direct Merge	**GP/EL System Interface:** Provides access the I-285 ELs and adjoining existing GP lanes at the eastern end of the I-285 EL facility

1.4 Public Involvement

The NEPA process guides efforts to inform and involve the public in the planning and decision-making process for the Proposed Project. Additional measures were employed to ensure that underrepresented low-income or minority populations were included in this outreach effort in a meaningful way. The first step in this process involved the identification of EJ populations through an analysis of census data, consultation with local authorities, and subsequent field surveys.

During fieldwork and desktop research, two low-income multifamily neighborhoods were identified adjacent to the eastbound side of I-285 at Roswell Road. The apartment communities of Sierra Place and the Harrison at Sandy Springs, whose residents include high percentages of minority and Spanish-speaking populations, were considered in project concept development.

A series of public meetings named Community Conversations were held on May 14, 15, 21, 22, and 23, 2019.[8] The series consisted of seven meetings on five dates, located throughout the Proposed Project corridor to provide convenient options for nearby residents and employees. The series hosted a total of 562 attendees (including some who attended more than one meeting). The locations and times for the Community Conversations provided access to interested parties throughout the Proposed Project corridor, including three afternoons (12:00 p.m. to 2:00 p.m.) and four evenings (6:00 p.m. to 8:00 p.m.). Both meeting times were held on May 14 and May 22.

In addition, Georgia DOT hosted seven Public Information Open Houses (PIOHs) in January 2020 along the corridor.[9] Meetings were scheduled across two consecutive weeks on Tuesdays and Thursdays, the preferred days for public meetings. The multi-date schedule provided convenient options for local residents to attend near their homes or workplaces at any of the seven meetings (all of which provided the same materials and format). The meetings included four mid-day and three evening times for a total of 18 hours of open house availability. The locations were selected for convenience, free parking, adequate space, access to transit options, and full access to Americans with Disabilities Act (ADA) facilities.

In advance of the PIOH series, language needs were identified through census research, field surveys, and input from local officials. Spanish speakers are the largest population of non-English speakers along the corridor, so resources were focused on hard copy materials in Spanish with access to translators or language identification tools (digital and hard copy) for other non-English speakers. The PIOHs attracted 722 attendees. During the 90 days leading up to these PIOHs, outreach activities focused on the areas identified by the three previous identification tools. The activities included the following:

- Posting English and Spanish versions of meeting flyers/posters at seven local libraries, community centers, places of worship, and minority and/or low-income multifamily housing communities, including the Sierra Place Apartments and the Harrison at Sandy Springs.
- Providing copies of English and Spanish flyers/posters to consulate offices for distribution to minority and Spanish-speaking community contacts.

[8] Georgia Department of Transportation (Georgia DOT). 2019. *I-285 Top End Express Lanes Community Conversations Summary*. https://mailchi.mp/0fe99496e738/i-285-top-end-express-lanes-community-conversations-recap.

[9] Georgia Department of Transportation (Georgia DOT). 2020a. *Responses to Public Information Open House Comments for PI# 0001758, Cobb, Fulton, and DeKalb Counties, I-285 Top End Express Lanes*. March 27. https://cdn.majormobilityga.com/wp-content/uploads/2020/03/31115304/PI-0001758-PIOH-Comment-Response-Summary-Letter-27Mar20.pdf.

- Coordinating with communications staff of municipalities to inquire about any minority or low-income populations needing access to PIOH information and providing translated flyers for communications staff to distribute to local community leaders.

During the PIOH series, the outreach included the following measures:

- Providing translated materials in Spanish, including a welcome letter, Proposed Project fact sheet, noise sheet, air quality sheet, and comment cards at the meetings.
- Scheduling a Spanish interpreter with the court reporter at all seven PIOH meetings for transcription of verbal comments and Spanish language support. Also, individuals were available with native skills in Spanish and Mandarin Chinese to respond to questions.
- Offering language identification tools (hard copy and digital) upon request at each PIOH meeting to determine any other Limited English Proficiency concerns by attendees so that translations or interpreter support could be provided (no other languages were requested by attendees).
- In addition to language support, Georgia DOT assured accessibility needs were met by providing ADA-compliant public meeting space for all PIOH meetings. Public notices advertising the PIOH meetings provided a point of contact for anyone wanting to request additional accommodation.

The respondents showed high levels of interest in noise, transit, right-of-way, traffic, property values, design, and local access points as project topics. No new EJ populations or communities of concern beyond those recognized during the initial identification process were found through these public involvement opportunities.

In early 2022, the Proposed Project team conducted meetings with EJ community leaders to best assess communications techniques with EJ communities in the Project Area and forge partnerships with trusted organizations that serve the EJ and communities of concern. The following are key findings from the eight insight sessions:

- All participants agreed to partner with the Proposed Project team and offered their organizations as a conduit for meaningful engagement with the communities they serve; they are all willing to distribute project information and provide access to their existing communication channels, including social media, text messaging, and in-person engagement.
- All participants agreed to share information with the Proposed Project team on community events and/or offered to directly host the Proposed Project team at their events to provide public involvement opportunities.

The project team conducted seven EJ community intercepts in June, August, September, and October 2022 where the Proposed Project team hosted booths and participated in outreach at events throughout the project corridor to build awareness of the Proposed Project and provide opportunities for interested parties to submit comments and feedback. Additional community intercept outreach efforts were conducted in 2023 and prioritized EJ and generalized community engagement. For a summary for EJ outreach effort refer to **Chapter 5, Consultation and Coordination, Section 5.1, Exhibit 5-3**.

2. Evaluation Methodology

To evaluate the impacts of tolling on low-income populations, an analysis was conducted using existing and forecasted socioeconomic data from the Atlanta Regional Commission (ARC) Activity-Based Model (ABM),[10] estimated traffic and travel times from the ARC ABM, and American Community Survey (ACS)[11] population and income data. As ARC's approved regional Travel Demand Model for regional transportation planning and air quality conformity analysis, the ABM includes data for the years 2015 as existing conditions and 2050 as future conditions (the model's horizon year). The Travel Demand Model considers the overall effect of proposed projects throughout the regional network. The regional model was adapted for MMIP projects and updated in 2022, as described in **Appendix H-4, Transportation Systems Report.** The Transportation System Report provides the Proposed Project's transportation system performance analyses in the Draft EIS, including applicable data for this low-income tolling analysis (Appendix H-4, Attachment 1 MMIP PMC V2022: Travel Demand Model Development Report).

Total numbers of households by size and income group were grouped by traffic analysis zones (TAZs) from the ABM, enabling population characteristics to be compared with low-income Census data and accurately linked to ARC's travel demand modeling outputs. The following steps were completed for the analysis:

1. Determined area of the model network to include in the analysis by comparing future No-Build and Preferred Alternative volumes with Census Block Group geography.
2. Identified the distribution of low-income populations using Census Tract income/poverty level data and the ARC ABM population data.
3. Performed analysis of select links to determine the origin and destination of EL trips (Select Link Analysis described in **Section 2** and detailed in **Section 4**).[12]
4. Compared EL trip distributions and travel times within low-income areas versus other areas to assess effects on low-income populations.
5. Discussed operational and planning considerations with respect to zones as identified as likely containing low-income populations.
6. Determined effects of ELs based on TAZ analysis in accordance with **Section 1.1**.

2.1 Area of Analysis

The relevant area to conduct the low-income tolling analysis was determined by comparing changes in volume between the No-Build and Preferred Alternative for the Proposed Project corridor and adjacent facilities. Using ARC ABM data, the No-Build and Preferred Alternative were compared to calculate the percent change in annual average daily traffic (AADT) volumes for existing roadways. As a reasonable threshold of meaningful traffic change, adjacent roadways were identified as "impacted links" if they were projected to experience at least a 5%

[10] Atlanta Regional Commission (ARC). 2020. "Activity Based Modeling." https://atlantaregional.org/transportation-mobility/modeling/modeling/.

[11] U.S. Census Bureau, American Community Survey Data. 2021. *5-Year Sample (Table S1701).* https://data.census.gov/cedsci/table?q=S1701&tid=ACSST1Y2019.S1701.

[12] Atlanta Regional Commission (ARC). 2020. "Activity Based Modeling." https://atlantaregional.org/transportation-mobility/modeling/modeling/.

increase or decrease in volumes when comparing the Preferred Alternative and No-Build Alternative in 2050, as follows:

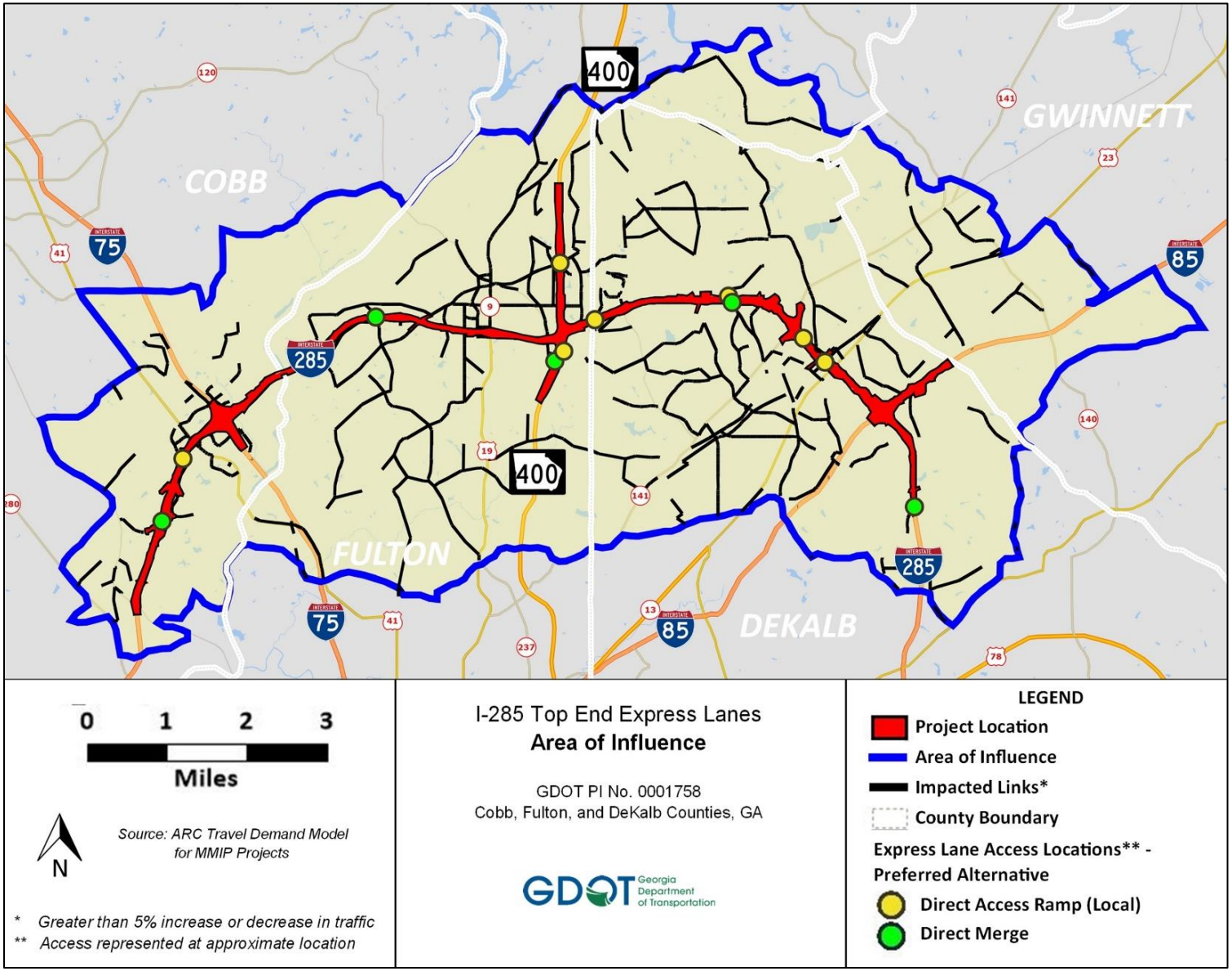
- 5% or greater change in AADT volumes on congested highway links with Level of Service (LOS) D or worse
- 10% or greater change in AADT volumes on uncongested highway links with LOS C or better

These impacted links were reviewed to determine if changes were logically connected to the Proposed Project, generally located along the project corridor, and then adjusted to include the total TAZ boundaries, resulting in the area for low-income tolling analysis, referred to herein as the area of influence (AOI) as shown in **Exhibit 2-1**.

The threshold of a 5% increase or decrease in traffic volumes as a meaningful traffic change is derived from FHWA guidance on determining areas for Mobile Source Air Toxics (MSAT) analysis, which GDOT has applied to identify similar boundaries for low-income tolling analyses on other projects.[13] The 5% threshold was applied as a conservative indicator of roadways that could experience a meaningful change in volumes.

[13] Federal Highway Administration (FHWA). n.d. *Frequently Asked Questions (FAQs): FHWA Recommendations for Conducting Quantitative Mobile Source Air Toxics (MSAT) Analysis for FHWA NEPA Documents*. https://www.fhwa.dot.gov/ENVIRonment/air_quality/air_toxics/policy_and_guidance/msat/fhwa_nepa_msat_faq_moves3_.pdf.

Exhibit 2-1: Proposed Project Area of Influence (Meaningful Traffic Changes)



2.2 Identify Low-Income Populations

The ABM divides income data into four income groups, with an annual household income of $25,000 or less designated as the low-income group. The definition of the low-income threshold for this analysis is based on the HHS Poverty Guidelines.[14] In 2021, the HHS Poverty Guidelines considered an annual income of $26,500 to be the poverty guideline for a family or household of four persons. According to the *Guidance on Environmental Justice and NEPA Memorandum*,[15] the HHS Poverty Guidelines define the low-income threshold for EJ and NEPA analysis. The $25,000 per household income threshold in the ARC ABM data is effective as a conservative threshold to represent the HHS Poverty Guidelines for a household of four, whereas the median household size throughout the region is below three persons per household. Therefore, this threshold applied within the ABM data provides an appropriate indicator of percentages of federally defined low-income households in the Proposed Project area.

Exhibit 2-2 summarizes the resulting low-income households at the regional,16 county, and AOI levels for 2015 and 2050. On average, the share of households in the lowest income group is higher within the region (15%) than within the AOI for both 2015 (12%) and 2050 (13%).

Exhibit 2-2: Summary of Low-Income Households

Scenario	Regional Households			Within AOI		
	Total	<$25,000 Household Income	% Share	Total	<$25,000 Household Income	% Share
ARC Year 2015	2,166,000	322,500	15%	164,200	20,350	12%
ARC Year 2050	3,370,300	521,400	15%	236,500	31,700	13%

While the ARC ABM maintains forecasts by household and income group, a common metric for low-income thresholds is the percentage of the population below the poverty level. The U.S. Census defines the population below the poverty level by comparing annual income to a set of dollar values (called poverty thresholds) that vary by family size, number of children, and the age of the householder. These thresholds vary by year and are determined using the Consumer Price Index.[17] Low-income households serve as a proxy for the population below the poverty level, because data by family size, number of children, and age of households are not available in the Project Design Year 2057.

The percentage of the population below the poverty level was determined by county using the U.S. Census Bureau's ACS. Data was selected by Census Tract for the ACS *2021 5-Year sample, Poverty Status in the Past 12 Months* (ACS Table S1701)[18] for all census tracts within the state of Georgia. In addition to computing the Metro Atlanta regional average, the tract-level percentages below the poverty level were averaged (by tract) for each of the 20 counties within ARC's modeling area as a point of reference. This analysis determined that the regional

[14] U.S. Department of Health and Human Services (HHS). "2021 Poverty Guidelines."—U.S. Federal Poverty Guidelines Used to Determine Financial Eligibility for Certain Federal Programs. https://aspe.hhs.gov/2021-poverty-guidelines.

[15] Federal Highway Administration (FHWA). 2011. *Guidance on Environmental Justice and NEPA*. December 16. https://www.environment.fhwa.dot.gov/env_topics/ej/guidance_ejustice-nepa.aspx.

[16] Region is defined as the 20-county metro area included in ARC's modeling area.

[17] U.S. Bureau of Labor Statistics. 2021. "Consumer Price Index." https://www.bls.gov/cpi/.

[18] U.S. Census Bureau, American Community Survey Data. 2021. *5-Year Sample (Table S1701)*. https://data.census.gov/table?q=S1701:+POVERTY+STATUS+IN+THE+PAST+12+MONTHS&g=0400000US13$1400000&tid=ACSST5Y2021.S1701.

average of the population below the poverty guideline is approximately 12%, while the average for counties within the AOI varied from 8.5% (Cobb County) to 14.4% (Fulton County) below the poverty level, as shown in **Exhibit 2-3**. The 12% threshold was then used to identify and illustrate the TAZs where the percent below the poverty guideline exceeds this rate. Data from the ARC ABM TAZs for 2015 and 2050 will identify the TAZs as either above or below the regional poverty average for select link tolling analysis.[19]

Exhibit 2-3: ACS 2021 5-Year Average Percentage Below Poverty Level

Area	% Below Poverty Level[a]
State	15.1
ARC Region Within Study Area	12.0
Cobb County	8.5
DeKalb County	13.8
Fulton County	14.4
Gwinnett County	10.4

[a] *By average of Census Tract Percentage within the area.*

2.3 Select Link Analysis

Select Link Analysis is a tool used with ARC ABM data to identify the origins and destinations of selected trips. For this evaluation, the Select Link Analysis recorded the origin and destination of all EL trips through the AOI. Using this data, the share of EL trips destined to TAZs that are above or below the regional poverty average was identified.

2.4 Travel Time Analysis

Traffic projections, based on the ARC ABM, identify the average travel times and speeds along the I-285 corridor during AM and PM peak periods. EL users can expect to have more consistent travel times and higher average speeds (compared to GP lane users) during peak travel periods in either direction. While not a purpose of the ELs, GP users could experience improved travel times based on the reduction in volumes for trips through the Proposed Project area. A summary of the results of the travel time analysis is presented in **Section 5**.

3. Low-Income/Poverty Distribution

As discussed in **Section 2**, TAZs within the AOI were identified by their share of either low-income or poverty-level populations for the years 2015 and 2050. Using the totals for low-income households, the 2015 rate of regional households with an income below $25,000 per year was 12%, while the 2050 rate is 13%. **Exhibit 3-1** presents the share of low-income households by TAZ for 2015 and 2050. In general, low-income populations within the AOI are centered toward the east of the study area along Buford Highway and I-85, near Chamblee, Doraville, and Norcross. Smaller concentrations of low-income populations can be found in the Sandy Springs area just to the west of SR 400 and in the west along I-285 and I-75 in Cobb County. In 2050, distributions remain similar, with some increase in concentrations of low-income populations.

[19] The 2021 ACS data were used as the 5-year period for the U.S. Census Tracts. Other data sources include the currently adopted ARC ABM and tolling records provided by State Road and Tolling Authority for 2018-2019, prior to lockdown conditions from the COVID-19 pandemic and resulting reduced volumes during 2020-2021.

The regional share for the population below the poverty level identified using 2021 5-year ACS data was 12.2%. **Exhibit 3-2** shows the share of poverty status in relation to the regional average for each TAZ located within the AOI. Rates remain consistent across most of the TAZs from 2015 to 2050, though some experience changes, primarily increases, in the share of the population below the poverty level. TAZs located along Buford Highway and I-85, near Chamblee, Doraville, and Norcross show some expansion in the number of low-income TAZs. In general, growth in the areas of low-income populations occurs near areas already identified as low-income.

Exhibit 3-1: Percent Low-Income by TAZ, 2015 vs. 2050

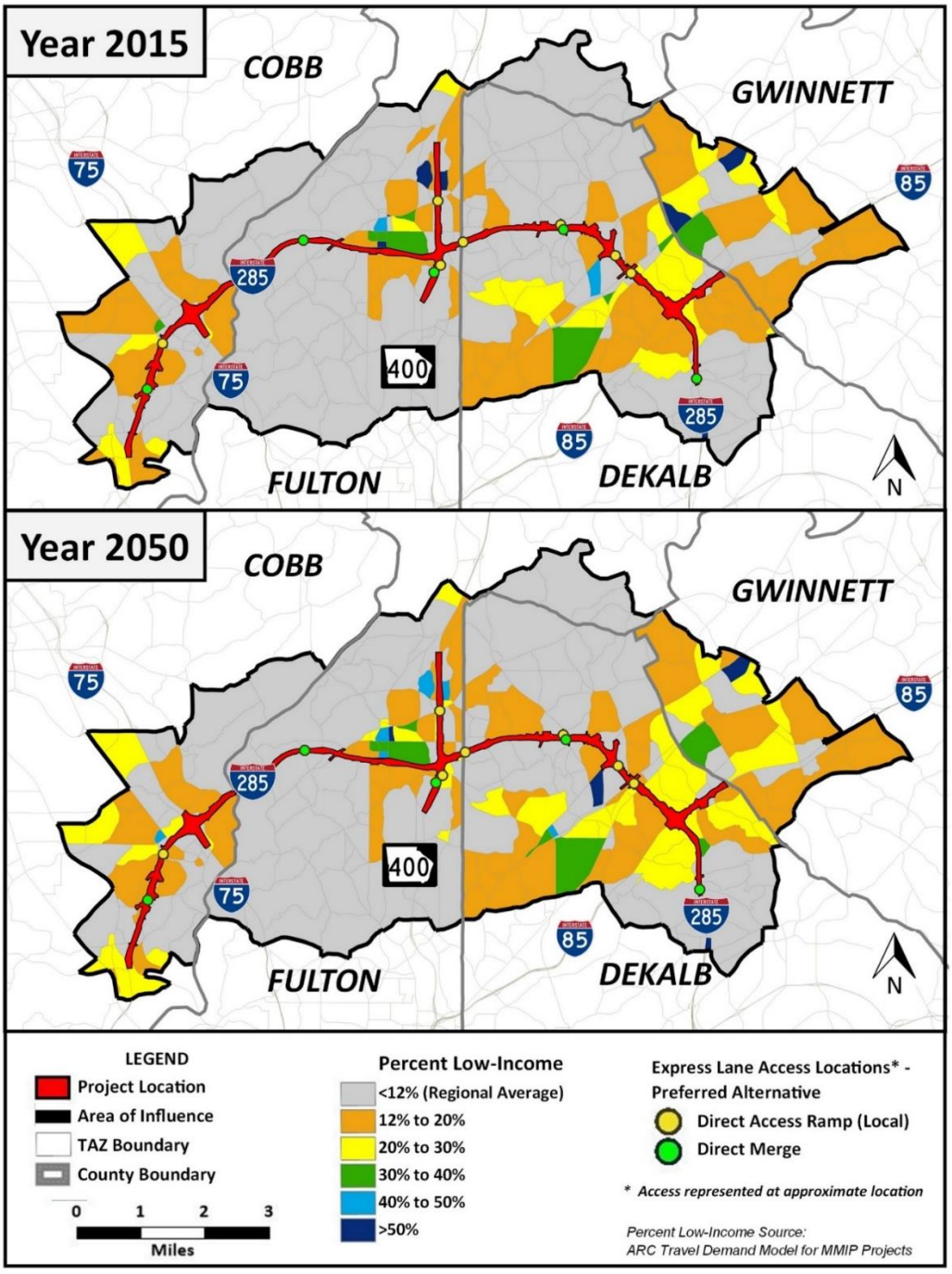
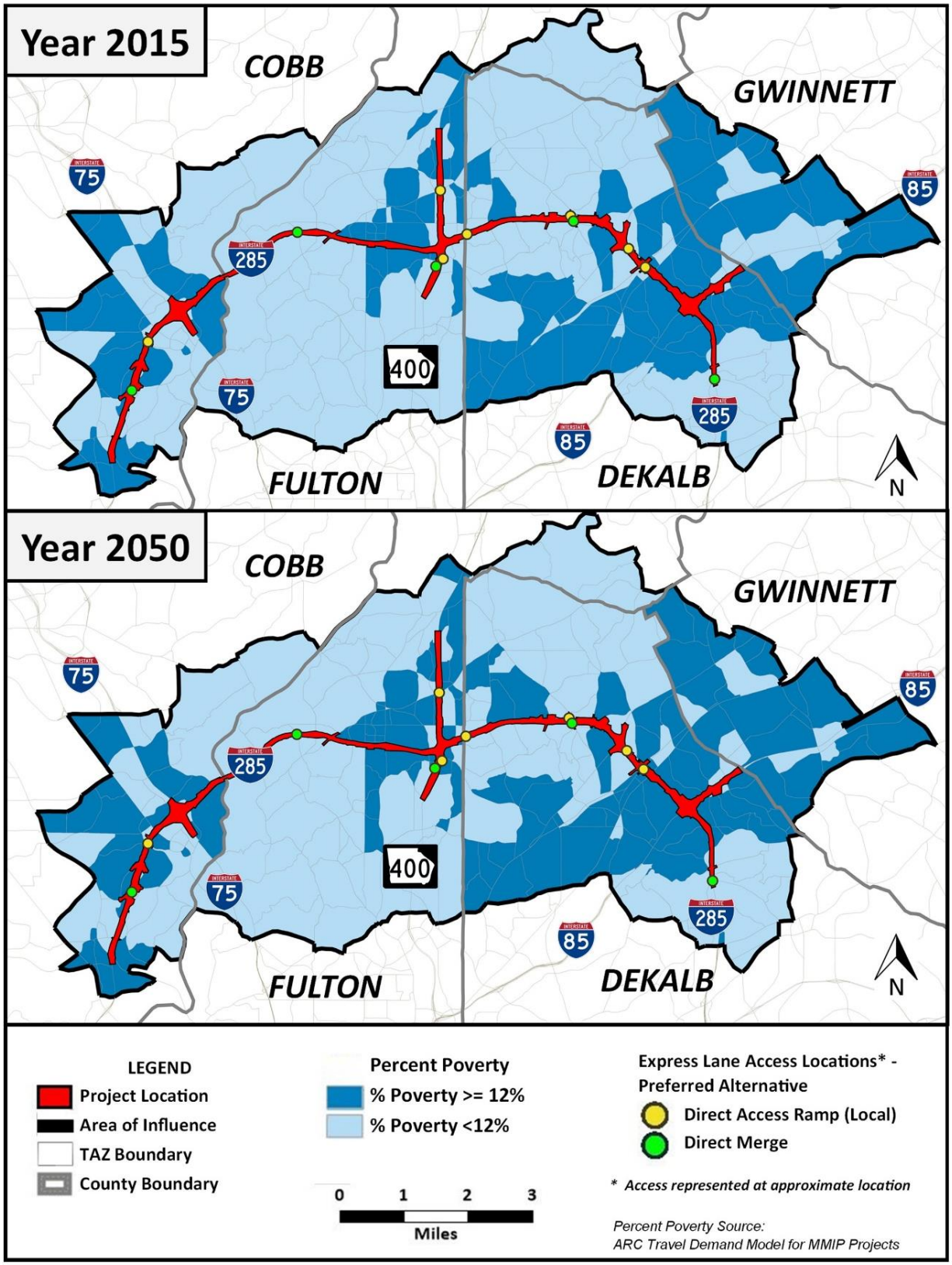


Exhibit 3-2: TAZs Above/Below Poverty Level, 2015 vs. 2050



4. Select Link Analysis

The ARC Travel Demand Model was used to perform a Select Link Analysis to determine the TAZ origins and destinations for trips using the ELs. The analysis was performed for the year 2050 Preferred Alternative scenario. Select Link Analysis is performed during the traffic assignment step of the model, after trips have been aggregated to the TAZ level. Select Link Analysis was used to determine what trips use the ELs and their origins and destinations. Using this information, EL trips that started or ended with the AOI were further analyzed to determine how many trips started or ended within a TAZ that was below the regional poverty average. The 2050 Select Link Analysis shows the following:

- 53% of households within the AOI are in TAZs below the regional poverty average.
- 122,271 EL trips started/ended in TAZs within the AOI.
- Of these 122,271 trips, 51% of EL trips (61,870) started within the AOI and used ELs.
- The remaining 49% of EL trips (60,401) ended within the AOI and used ELs.
- 51% of EL trips that started within the AOI originate at TAZs below the regional poverty average.
- 54% of EL trips that ended within the AOI are destined for TAZs below the regional poverty average.
- The usage of ELs by TAZs below the regional poverty average is proportionally equal to the percentage of low-income households (51 to 54% versus 53%).

Proportionally, a similar share of users starting or ending trips in the AOI are to/from TAZs below the regional poverty average as the overall AOI area, as shown in **Exhibit 4-1**.

Exhibit 4-1: Share of Express Lane Trips by TAZ Regional Poverty Status

TAZ Designations	Households		Express Lane Trips – Start within AOI		Express Lane Trips - End within AOI	
	Total	Percent	Total	Percent	Total	Percent
TAZs above Regional Poverty Average	112,054	47%	30,104	49%	27,675	46%
TAZs below Regional Poverty Average	124,452	53%	31,766	51%	32,726	54%
Total	236,506	100%	61,870	100%	60,401	100%

Aside from where the I-285 Top End ELs meet the other MMIP projects, the volume of trips interacting with ELs is the largest around existing interchanges and access points. The Select Link Analysis determined the origin and destination of EL trips in and through the study area. **Exhibit 4-2** indicates usage of the ELs along with the TAZs above/below the poverty average.

Exhibit 4-2: 2050 EL Volumes and TAZs Above/Below Poverty Average

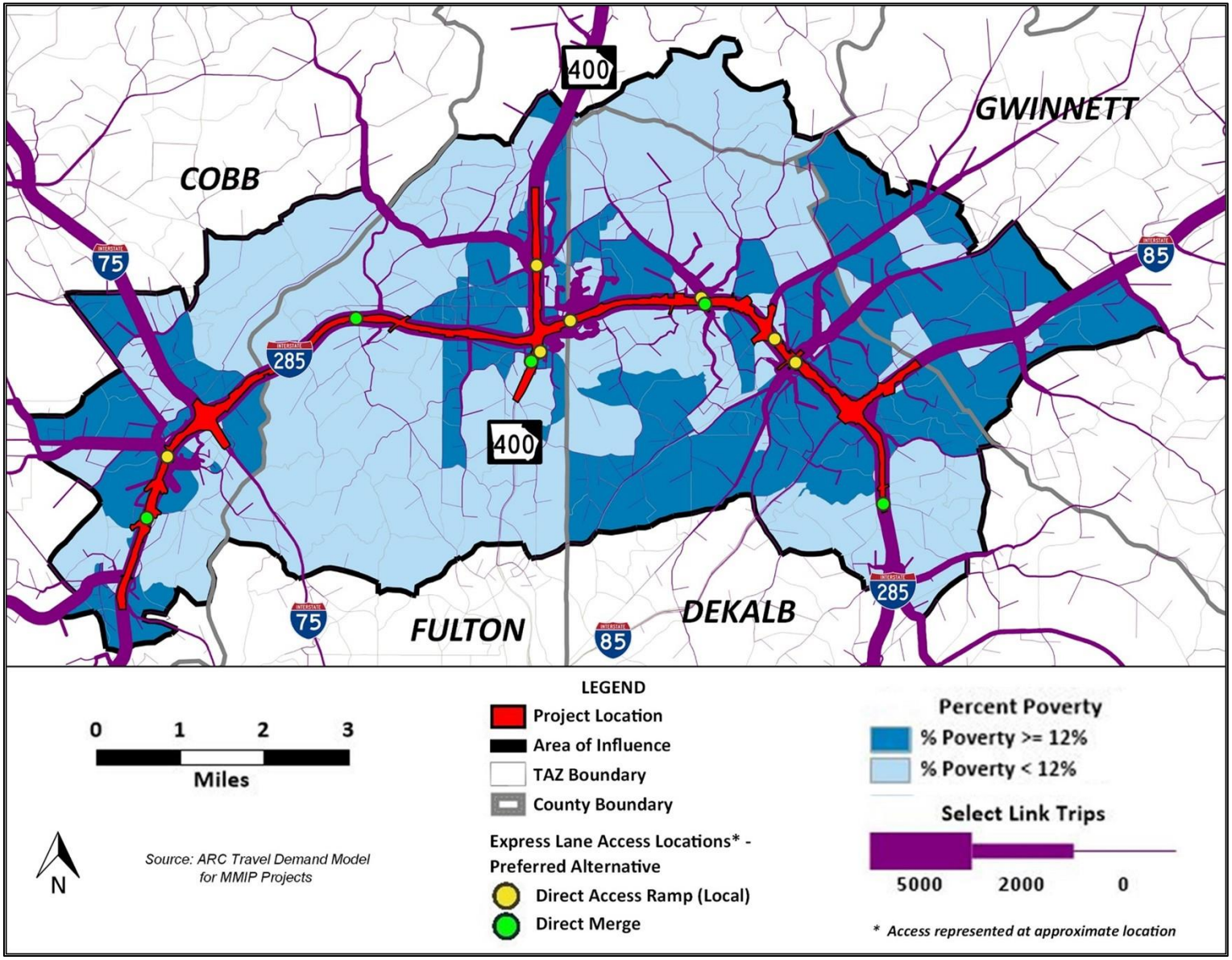
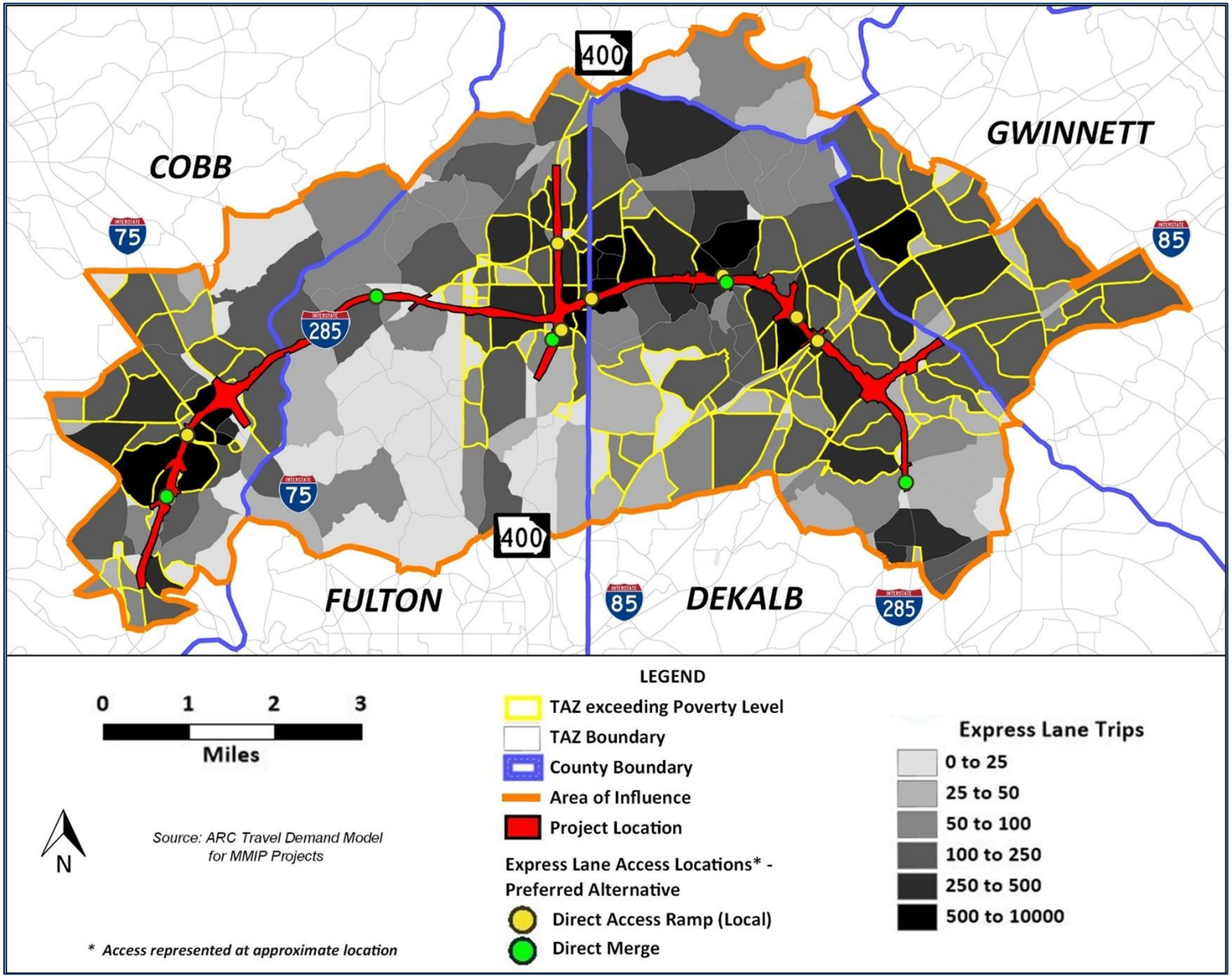


Exhibit 4-2 shows heavy usage on the freeway system (depicted by the wider bands), along with trips connecting access points on I-285 to Smyrna, Sandy Springs, Doraville, Chamblee, and Norcross. Many of these trips that start or end within the AOI are designated for TAZs below the average regional poverty average, as presented in **Exhibit 4-1**.

Exhibit 4-3 illustrates the number of EL trips originating from each TAZ within the AOI, with those TAZs that exceed the poverty threshold highlighted in yellow. The TAZs with the highest output of EL trips are between SR 400 and I-85 along I-285 and along I-75 near the I-285/I-75 interchange.

Exhibit 4-3: 2050 EL Volume Origins Within AOI



5. Travel Time Analysis, Preferred Alternative vs. No-Build Alternative

Travel time analysis has been completed using the ARC Travel Demand Model developed for the MMIP. The ARC Travel Demand Model has been developed and maintained to plan for transportation improvements as part of ARC's overall regional planning efforts. As adopted in 2016, the current plan extends through the horizon year of 2050. The Travel Demand Model considers the overall effect of proposed projects throughout the regional network. **Appendix H-4, Transportation Systems Report,** provides the Proposed Project's transportation system performance analyses in the Draft EIS.

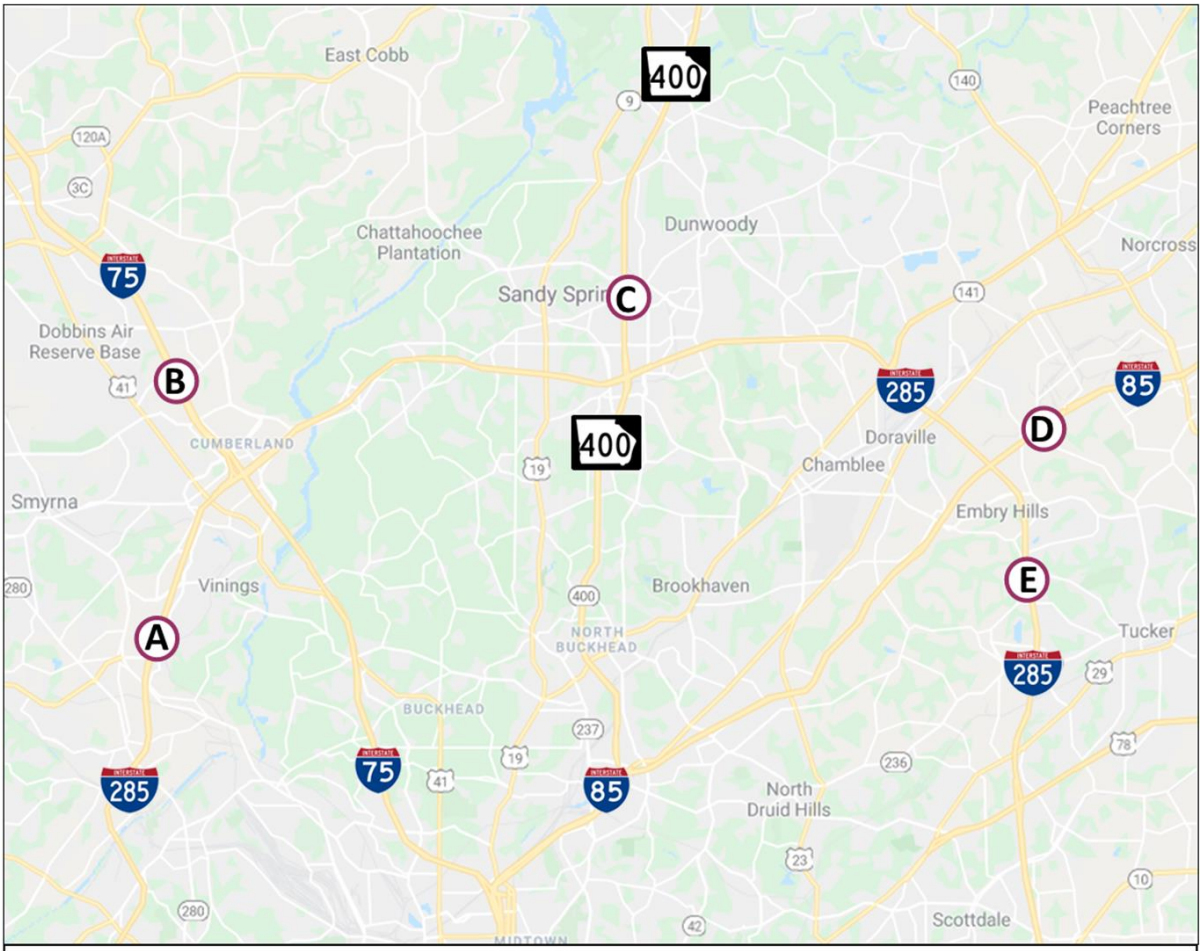
ARC Travel Demand Model travel times represent the average travel time over the entire AM or PM peak periods, which are both 4 hours in duration. **Exhibits 5-1** through **5-4** display comparisons of travel times in the 2050 No-Build and Preferred Alternative conditions for AM and PM peak periods by direction. Travel times are displayed for five travel routes along the corridor using either GP lanes (No-Build and Preferred Alternative) or ELs (Preferred Alternative).

In the AM eastbound scenario, the typical trip on one of these five travel routes in a GP lane would take 3 to 4 fewer minutes in the Preferred Alternative as compared to No-Build. EL trips in the Preferred Alternative would expect travel times 8 to 13 minutes shorter than GP trips in the No-Build Alternative. In the AM westbound scenario, the typical trip in a GP lane would take 3 to 6 fewer minutes in the Preferred Alternative. EL trips in the Preferred Alternative would expect travel times 10 to 16 minutes shorter than GP trips in the No-Build Alternative.

In the PM eastbound scenario, the typical trip in a GP lane would take 4 to 6 fewer minutes in the Preferred Alternative. EL trips in the Preferred Alternative would expect travel times 11 to 19 minutes shorter than GP trips in the No-Build alternative. In the PM westbound scenario, the typical trip in a GP lane would take 4 to 6 fewer minutes in the Preferred Alternative. EL trips in the Preferred Alternative would expect travel times 10 to 17 minutes shorter than GP trips in the No-Build Alternative. Along the selected routes in the corridor, improvement in travel times would range from 10 to 24% in the GP lanes and from 33 to 54% in the ELs.

With the Preferred Alternative (addition of ELs in the project limits), travel times in the GP lanes would decrease compared with the No-Build Alternative in both the AM and PM peak periods. While not a purpose of the ELs, GP users could experience improved travel times based on the reduction in volumes in the GP lanes due to additional capacity available along the corridor due to the proposed ELs.

Exhibit 5-1: 2050 Travel Times for GP and EL, AM Peak Period Eastbound

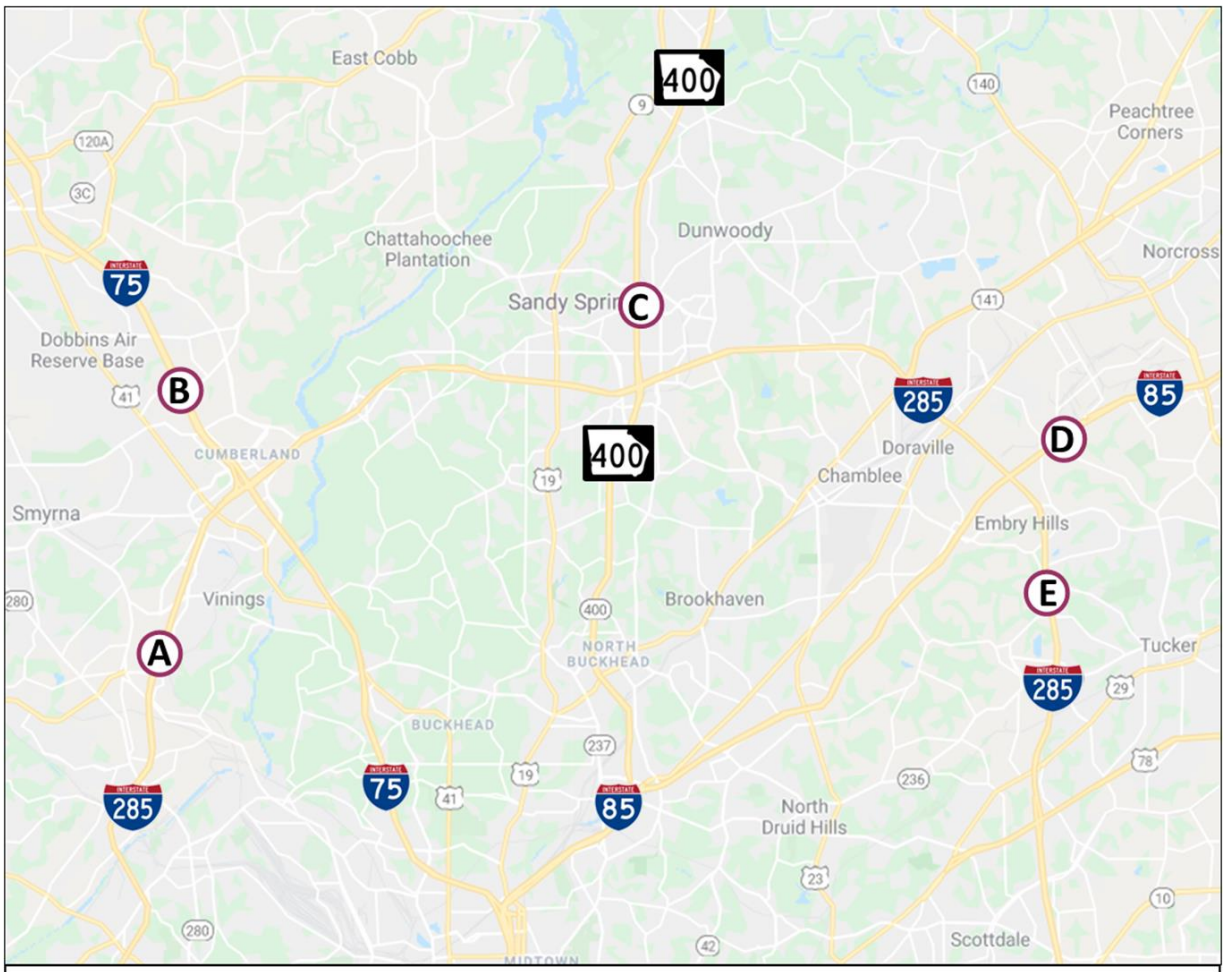


Eastbound Trips—AM Peak Period Average Travel Time (in minutes)

From		To		Trip Length (mi)	No Build	Preferred Alternative		Improvement	
					GPLs	GPLs	ELs	GPLs	ELs
A	I-285 North of S Atlanta Rd (West EL Termini)	C	GA 400 at North Springs MARTA (GA 400 EL Tie-in)	12	26	23	14	-12%	-46%
A	I-285 North of S Atlanta Rd (West EL Termini)	D	I-85 North of Pleasantdale Rd (I-85 HOT Tie-in)	17	33	29	20	-12%	-39%
A	I-285 North of S Atlanta Rd (West EL Termini)	E	I-285 East of Henderson Rd (East EL Termini)	18	33	29	20	-12%	-39%
C	GA 400 at North Springs MARTA (GA 400 EL Tie-in)	E	I-285 East of Henderson Rd (East EL Termini)	11	20	16	12	-20%	-40%
B	I-75 at Terrell Mill Rd	E	I-285 East of Henderson Rd (East EL Termini)	17	30	27	20	-10%	-33%

Source: MMIP v2022 ARC Travel Demand Model. 2022.

Exhibit 5-2: 2050 Travel Times for GP and EL, AM Peak Period Westbound

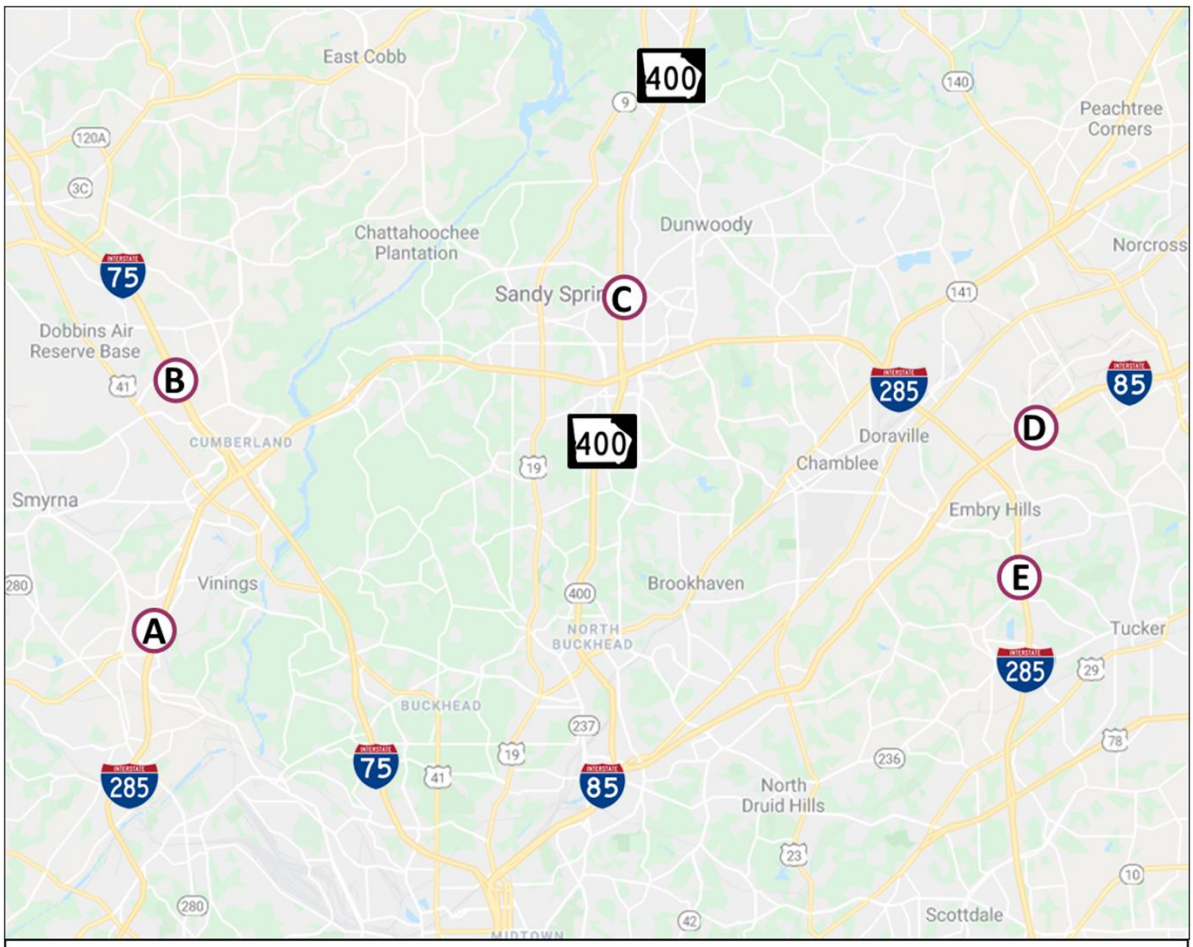


Westbound Trips—AM Peak Period Average Travel Time (in minutes)

From		To		Trip Length (mi)	No Build	Preferred Alternative		Improvement	
					GPLs	GPLs	ELs	GPLs	ELs
C	GA 400 at North Springs MARTA (GA 400 EL Tie-in)	A	I-285 North of S Atlanta Rd (West EL Termini)	12	25	20	15	-20%	-40%
D	I-85 North of Pleasantdale Rd (I-85 HOT Tie-in)	A	I-285 North of S Atlanta Rd (West EL Termini)	17	34	30	21	-12%	-38%
E	I-285 East of Henderson Rd (East EL Termini)	A	I-285 North of S Atlanta Rd (West EL Termini)	18	35	29	19	-17%	-46%
E	I-285 East of Henderson Rd (East EL Termini)	C	GA 400 at North Springs MARTA (GA 400 EL Tie-in)	11	22	19	11	-14%	-50%
E	I-285 East of Henderson Rd (East EL Termini)	B	I-75 at Terrell Mill Rd	17	33	29	17	-12%	-48%

Source: MMIP v2022 ARC Travel Demand Model. 2022.

Exhibit 5-3: 2050 Travel Times for GP and EL, PM Peak Period Eastbound

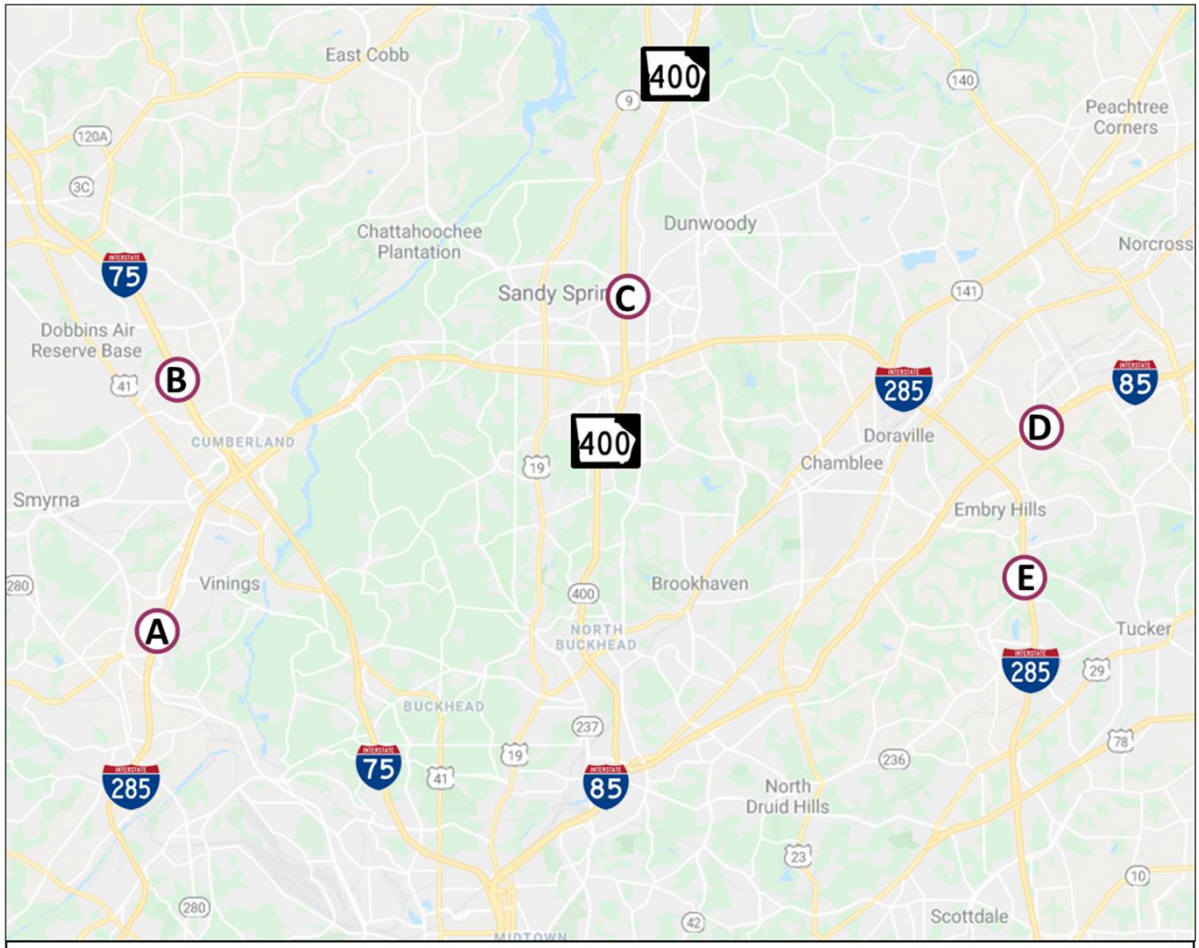


Eastbound Trips—PM Peak Period Average Travel Time (in minutes)

From		To		Trip Length (mi)	No Build	Preferred Alternative		Improvement	
					GPLs	GPLs	ELs	GPLs	ELs
A	I-285 North of S Atlanta Rd (West EL Termini)	C	GA 400 at North Springs MARTA (GA 400 EL Tie-in)	12	26	22	15	-15%	-42%
A	I-285 North of S Atlanta Rd (West EL Termini)	D	I-85 North of Pleasantdale Rd (I-85 HOT Tie-in)	17	38	34	21	-11%	-45%
A	I-285 North of S Atlanta Rd (West EL Termini)	E	I-285 East of Henderson Rd (East EL Termini)	18	39	33	20	-15%	-49%
C	GA 400 at North Springs MARTA (GA 400 EL Tie-in)	E	I-285 East of Henderson Rd (East EL Termini)	11	26	22	12	-15%	-54%
B	I-75 at Terrell Mill Rd	E	I-285 East of Henderson Rd (East EL Termini)	17	36	32	17	-11%	-53%

Source: MMIP v2022 ARC Travel Demand Model. 2022.

Exhibit 5-4: 2050 Travel Times for GP and EL, PM Peak Period Westbound



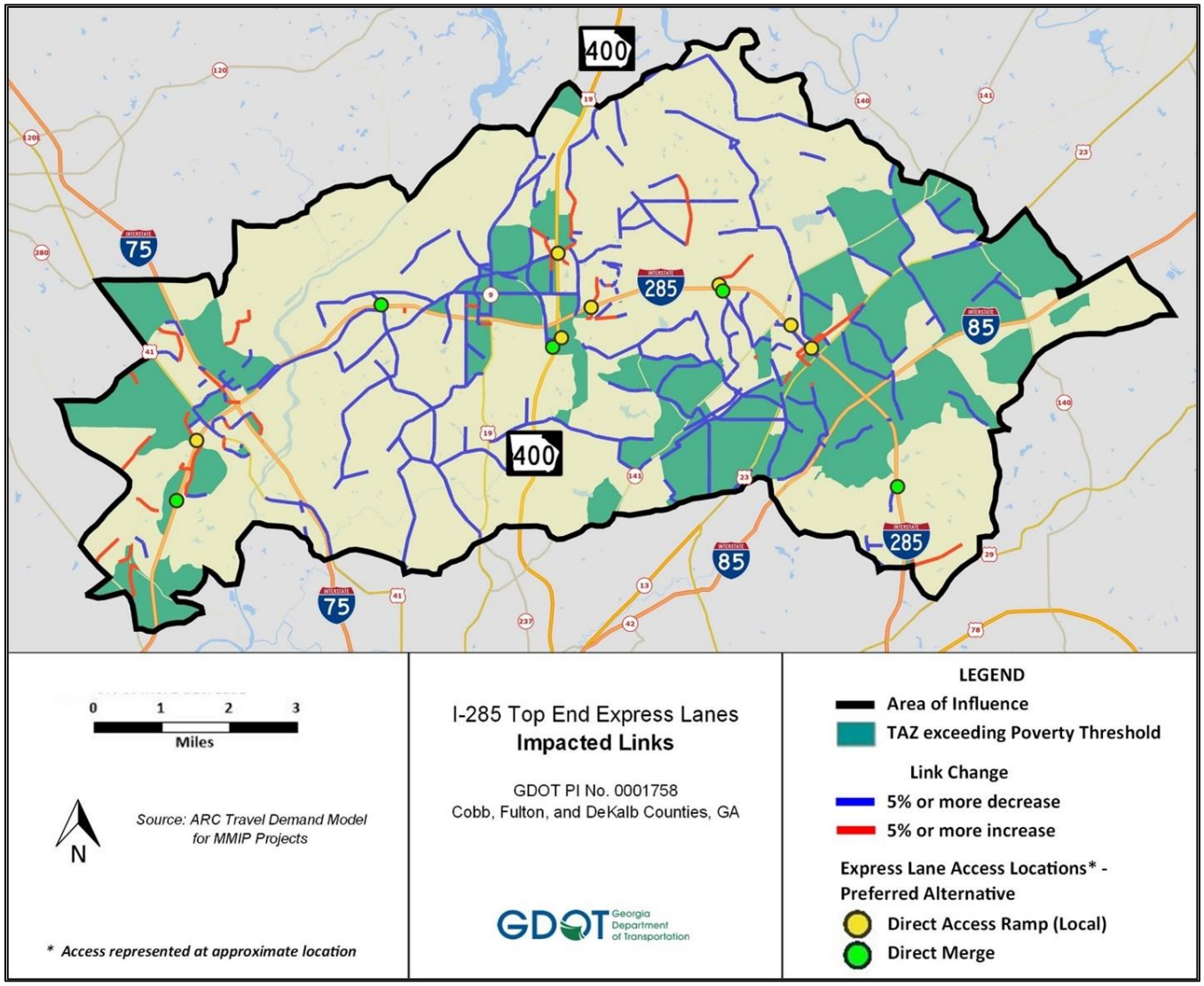
Westbound Trips—PM Peak Period Average Travel Time (in minutes)

From		To		Trip Length (mi)	No Build	Preferred Alternative		Improvement	
					GPLs	GPLs	ELs	GPLs	ELs
C	GA 400 at North Springs MARTA (GA 400 EL Tie-in)	A	I-285 North of S Atlanta Rd (West EL Termini)	12	29	25	15	-14%	-48%
D	I-85 North of Pleasantdale Rd (I-85 HOT Tie-in)	A	I-285 North of S Atlanta Rd (West EL Termini)	17	36	31	21	-14%	-42%
E	I-285 East of Henderson Rd (East EL Termini)	A	I-285 North of S Atlanta Rd (West EL Termini)	18	37	31	20	-16%	-46%
E	I-285 East of Henderson Rd (East EL Termini)	C	GA 400 at North Springs MARTA (GA 400 EL Tie-in)	11	21	16	11	-24%	-48%
E	I-285 East of Henderson Rd (East EL Termini)	B	I-75 at Terrell Mill Rd	17	34	30	21	-12%	-38%

Source: MMIP v2022 ARC Travel Demand Model. 2022.

From the impacted link analysis, most of the roadway links with a projected change of 5% or greater reflect decreases in daily traffic volumes based on 2050 conditions. The primary links with 5% or more growth in volumes are GP and EL sections on I-75, SR 400, and I-85 along with sections of several arterials adjacent to I-285 interchanges including Buford Highway, Johnson Ferry, Mt. Vernon Highway, and Abernathy Road. Many of the roadways that show projected increases in traffic volumes also have links with projected decreases, partially offsetting the overall potential impact on the network. The modeled conditions for these links and the low-income TAZs are shown in **Exhibit 5-5**. For context, approximately 14 miles of roadway (excluding interstate and ELs) are projected in 2050 Preferred Alternative conditions to experience a volume increase of 5% or more. By contrast, approximately 135 miles of the roadway would experience a decrease by 5% or more.

Exhibit 5-5: Potential Impacted Links in Low-Income TAZs



The areas of predicted decreases in traffic volumes would occur throughout the network, affecting both EJ and non-EJ users. The correlating change in congestion levels also would affect all communities and commuting drivers in the impacted area, regardless of income level. The 2050 Preferred Alternative conditions on adjacent arterial roadways would reflect a slight decrease (1 to 2%) in severe and extreme congestion levels compared to

the No-Build Alternative, as those roadways increase by the same percentages in lower levels of congestion (minimal to moderate). The result would be an overall slight decrease in congestion on local arterials used by the traveling public regardless of any commuter use on I-285.

6. Express Lanes Program Pricing

An understanding of the EL pricing framework is needed to fully assess potential impacts on low-income populations and to identify mitigation strategies. The Georgia DOT anticipates that the Proposed Project would be constructed using a P3 delivery model. Under this model, Georgia DOT would select one or more developers to design, build, finance, operate and maintain the Proposed Project.

All Build Alternatives include tolling through Express Toll Lanes (ETLs) and would include dynamic tolling, where toll rates are set to manage congestion and maintain travel time reliability. No discounts or toll waivers would be provided for carpools or high-occupancy passenger vehicles that use the ELs. The tolls paid by users of the Proposed Project would vary by traffic conditions, length of their trip, and the Express Lane entry/exit points used.

Tolls rates would be set at a level to effectively manage the flow of traffic in the ELs and to maintain a minimum operating speed of 45 mph for toll-paying vehicles as well as transit vehicles. Georgia DOT and SRTA would establish parameters that would govern toll rates in the procurement and final contract documents. Although subject to change, the initial planning analysis indicates that the estimated average toll rates (in 2022 dollars[20]) for the first operating phase of the Proposed Project would be $1.25 per mile, with toll rates ranging from $0.10 per mile up to $1.50 per mile depending on travel demand and congestion levels. Toll rates would be regulated by contract and include both 1) a per mile limit on the nominal toll rate amount (known as the "operational toll rate") and 2) controls to ensure that any further toll rate adjustments are linked to maintaining operating performance requirements. Under normal traffic conditions, the per mile operational toll rate would be the maximum amount paid to use the ELs. However, to effectively manage demand and maintain travel speeds in the ELs, if congestion levels exceed contract-mandated thresholds, the actual per mile toll rate could be further adjusted temporarily and incrementally (up to double the operational toll rate amount) for the purposes of achieving a flow of traffic in the ELs at a minimum of 45 mph. In any instances where a temporary toll adjustment is needed to maintain the contractual operating requirements, rates higher than the operational toll rate could be charged, but only in the portion(s) of the corridor where travel speeds are degraded and only for a limited period of time until travel speeds again meet the minimum requirements. The operational toll rate would be allowed by contract to be adjusted annually by factors such as the State's GDP growth, the rate of inflation and/or to meet the contract performance metrics. These are intended to reflect economic conditions that are likely to both 1) add to traffic congestion in the corridor and 2) influence drivers' willingness to pay for a reliable trip. The anticipated toll rates presented above may change as the design of the Proposed Project is refined and the final contract terms are confirmed during the procurement process.

[20] 2022 data was used to provide consistency across the range of tolling information provided in various sections of the Draft EIS.

For reference, **Exhibit 6-1** summarizes the range of toll rates on EL facilities currently operating in Georgia. While there are no other developer-operated ELs in Georgia at this time, toll rate ranges for the ELs in other states that are similar to the Proposed Project are summarized in **Exhibit 6-2**.

Exhibit 6-1: Existing Express Lanes Tolls in Georgia

EL Roadway	Toll Rate Ranges [a] (2022)	Average Toll Rate (2022)	Toll Policy [b]
I-75 South Metro Express Lanes [c]	$0.10 - $0.30/mile	$ 0.19/mile	ETL
Northwest Corridor Express Lanes (I-75 & I-575) [c]	$0.10 - $0.31 /mile	$0.19/mile	ETL
I-85 Express Lanes	$0.10 - $1.04/mile	$0.40/mile	HOT 3+ (No Toll)
I-85 Express Lanes Extension	$0.10 - $0.34/mile	$0.19/mile	HOT 3+ (No Toll)

[a] *Minimum toll rate is $0.10/mile or $0.50 per trip.*

[b] *ETL – Registered vanpools, public transit buses and emergency responders use the ELs toll-free.*
HOT 3+ – Registered vanpools, public transit buses, emergency responders, motorcycles, registered alternative fuel vehicles, and passenger vehicles with three or more occupants use ELs toll-free.

[c] *Reversible Express Lanes*

Exhibit 6-2: Developer-Operated Express Lane Tolls in Other States

EL Roadway	Toll Rate Ranges (2022)	Average Toll Rate (2022)	Toll Policy
I-495 Express Lanes (VA)	$0.17 - $1.50/mile	$0.48/mile	HOT 3+ (No Toll)
I-95 Express Lanes (VA) [a]	$0.14 - $1.26/mile	$0.60/mile	HOT 3+ (No Toll)
I-77 Express Lanes (NC)	$0.18 - $1.13/mile	$0.56/mile	HOT 3+ (No Toll)
North Tarrant Expressway (TX)	$0.10 - $1.44/mile	$0.56/mile	HOV 2+ Discount (50%)
North Tarrant Expressway – Segment 3 (TX)	$0.08 - $0.95/mile	$0.43/mile	HOV 2+ Discount (50%)
LBJ Expressway (TX)	$0.20 - $1.03/mile	$0.62/mile	HOV 2+ Discount (50%)

[a] *Reversible Express Lanes*

6.1 Toll Collection Systems

The primary purpose of a priced lane is to maintain reliable travel times, making all-electronic tolling the primary method of toll collection instead of tollbooths or payment machines in each lane. To facilitate the electronic collection of tolls, users of the ELs are required to enroll in prepaid toll programs and purchase a transponder, an electronic toll collection device that adheres to the vehicle. Users exempt from tolls are also required to enroll and purchase a transponder; users exempt from tolls include all registered transit vehicles, state registered van pools, and authorized emergency service vehicles. Enrollment costs and requirements for the Georgia Peach Pass and BancPass Pay n Go are shown in **Exhibit 6-3**.

Low-income populations can experience challenges with having access to credit, requiring considerations for cash alternatives. As an example, SRTA's BancPass Pay n Go provides a way for users to purchase transponders and reload them with cash at participating retailers instead of using an online account that utilizes a credit card. A $2.00 convenience fee will be applied each time a BancPass Pay n Go account is reloaded. Knowing where to pay

and how to pay in cash is important for low-income populations who may not have access to electronic payment systems.

Exhibit 6-3: Prepaid Congestion Pricing Options

Program	Transponder Cost	Opening Balance Requirement	Low Balance Threshold	Payment Options
Peach Pass Georgia[a]	Free (Windshield mount; option for bumper mount)	$20.00 (Minimum Amount)	$10.00	Credit Card Debit Card Check Money Order Cash
BancPass Pay n Go[b]	$5.00 activation fee	Minimum $15 (Total for starter kit is $20.00) Note: $2.00 convenience fee each time funds added	$0	Cash Debit Card Credit Card

Sources:
[a] Peach Pass Retail Center. Nov 2023. Peach Pass Retail Center website. https://www.peachpass.com/.
[b] Peach Pass Retail Center. Nov 2023. BancPass Pay n Go. https://peachpass.com/pay-n-go/.

SRTA has implemented convenient customer-oriented solutions to facilitate toll lane access for all potential users, regardless of income status. One such initiative is the BancPass Pay n Go, a prepaid option that matches a fully activated transponder with the user's license tag through a simple texting feature. This option is available for purchase at participating retailers throughout Georgia.[21] The BancPass Pay n Go option allows customers the flexibility to reload the card with the amount of their choosing and includes a $2.00 reload fee at checkout. This option also does not automatically add funds when the account balance is low. Users can monitor their account balances with a phone app, online, or by calling a toll-free number. In addition, SRTA operates four retail centers throughout the region that allow current and prospective customers the opportunity to conduct business with SRTA in person (refer to **Exhibit 6-4**). These locations support new account sign up, account closings, account payments, and violation payments. Customers can pay with cash at select SRTA retailers.

Exhibit 6-4: Peach Pass Retail Locations

Name and Location	Open	Business Hours
Peach Pass Retail Center[a] 245 Peachtree Center Ave. NE, Atlanta 30303	Monday - Friday	8:00 a.m.–5:00 p.m.
Department of Drivers Services[b] 310 Hurricane Shoals NE, Lawrenceville 30046	Tuesday - Saturday	8:00 a.m.–6:00 p.m. Saturday 8:00 a.m.–12:00 p.m.
Department of Drivers Services[b] 619 Tanger Boulevard, Locust Grove 30248	Tuesday - Saturday	8:00 a.m.–6:00 p.m. Saturday 8:00 a.m.–12:00 p.m.
Department of Drivers Services[b] 3690 Old 41 Highway NW, Kennesaw 30144	Tuesday - Saturday	8:00 a.m.–6:00 p.m. Saturday 8:00 a.m.–12:00 p.m.

Source:
Peach Pass Retail Center. 2020. Peach Pass Retail Center website. https://www.peachpass.com/.
[a] Accessible by transit
[b] By appointment only.

[21] Peach Pass Retail Center. n.d. Peach Pass Retail Center website. https://www.peachpass.com/.

6.2 Alternate Payment Methods

In addition to enhanced outreach to inform low-income populations on the use of transponders, **Exhibit 6-5** summarizes alternate payment methods that were enacted by SRTA on other Georgia EL facilities. These flexible payment methods provide broader access for low-income populations.

Exhibit 6-5: Alternate Payment Method Examples

State	Program	Description
Georgia[a, b]	Peach Pass Retail Centers*	Locations where Peach Pass can be purchased in person
	Retail Partnership*	Partnership with retail stores statewide to leverage their existing network of retail locations to provide comprehensive access to BancPass Pay n Go reloadable cards

Sources:
[a] *Peach Pass Retail Center. 2020. Peach Pass Retail Center website. https://www.peachpass.com/.*
[b] *State Road and Tollway Authority (SRTA). 2020a. Annual Reports Library. https://www.srta.ga.gov/annual-reports/.*

6.3 Transit and Other Enhancements

Public transit provides another mode of travel as an alternative to personal vehicles. The consideration of transit use, described further in **DEIS Section 2.3.2.1, Evaluation of Transit Strategies** and **Appendix E, Alternatives Development**, included an overview of existing transit routes within or adjacent to the I-285 top end corridor (shown in **Exhibit 6-6**).

To be effective, transit options need to be accessible and affordable. Allowing registered public transit vehicles and vanpools to utilize ELs along the Proposed Project corridor toll-free, in accordance with current State Transportation Board practices (OCGA 32-9-4), is anticipated to improve transit service. As ELs improve the reliability of trip time planning, they enable transit users to better plan their trips. ELs would improve travel reliability for transit operators, thereby supporting increased transit ridership on buses and vanpools which use the ELs and enhance transit riders' accessibility to regional activity centers.

Authorized emergency response vehicles would also utilize the proposed ELs free of charge. The proposed ELs would enhance emergency response by providing options for quicker trip times and alternate routes to avoid traffic congestion on the GP lanes.

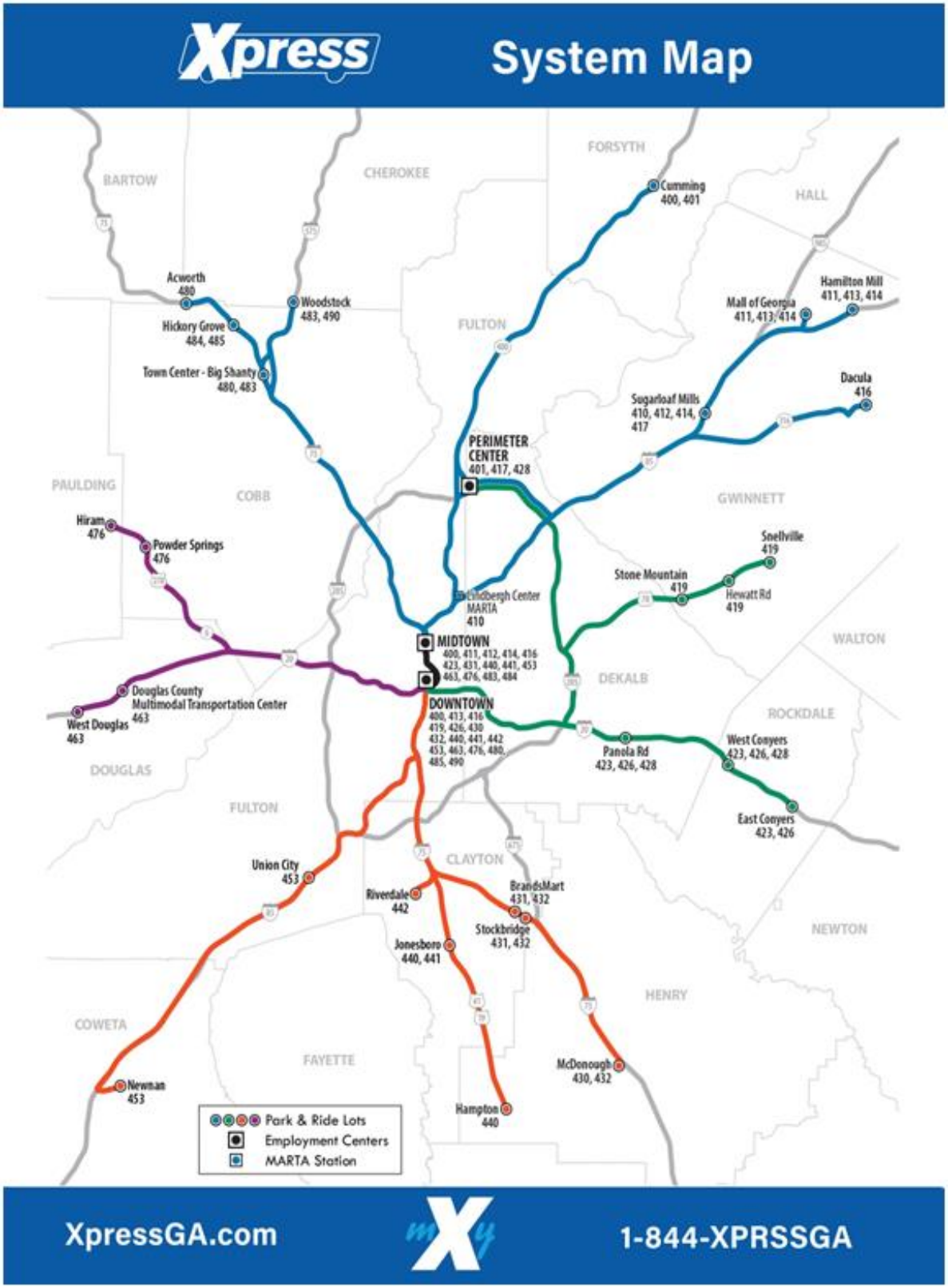
State and regional planning organizations are continuing to plan transit improvements along the Proposed Project corridor. In particular, the MARTA-led Planning Study for high-capacity transit within the I-285 top end ELs may identify specific transit-only infrastructure improvements for implementation in the future. Transit agencies include Cobb Community Transit, Gwinnett County Transit (park-and-ride lot in proximity to Project Area), MARTA, and the Atlanta-region Transit Link Authority (ATL). The MARTA facilities include five multimodal stations: Medical Center, Dunwoody, Sandy Springs, North Springs, and Doraville. The existing bus routes by these providers extend primarily from northern suburbs to destinations located inside the perimeter or travel along sections of I-285 toward the Perimeter Center (as reflected in Xpress Routes 417 and 428 originating at park-and-ride lots, extending southward, and using I-285 for service to the Perimeter Center, and Xpress Route 401 along SR 400 with services to Perimeter Center during weekday commuting hours).

Adding east-west bus service across the I-285 top end has been identified as a need in long-range planning by transit providers. A review of existing bus routes indicates that most of the schedules prioritize stops outside the

top end and provide transit access on I-75, SR 400, and I-85 for commuters. Continued and expanded access to transit is an important part of providing transportation options for low-income populations. The current ARC 2050 Regional Transportation Plan update includes long-range plans for high-capacity transit within the I-285 top end corridor. In March 2022, Georgia DOT, ATL, MARTA, Cobb County, Gwinnett County, and ARC entered into a Memorandum of Understanding to advance the MARTA-led planning study for high-capacity transit within the I-285 Top End ELs.[22] These independent future transit options could serve multifamily neighborhoods adjacent to the Proposed Project corridor, including transit-dependent populations where existing east-west transit routes are limited.

[22] Atlanta-Region Transit Link Authority, Metropolitan Atlanta Rapid Transit Authority, Cobb County, Gwinnett County, the Georgia Department of Transportation, and the Atlanta Regional Commission. 2022. *Memorandum of Understanding Regarding Funding and Collaboration By and Between the Atlanta-Region Transit Link Authority, the Metropolitan Atlanta Rapid Transit Authority, Cobb County, Gwinnett County, the Georgia Department of Transportation, and the Atlanta Regional Commission.* Effective March 9, 2022. Signed May 11, 2022.

1 Exhibit 6-6: Existing ATL Xpress Transit Routes and MARTA Stations



2 *Source: ATL. Xpress Georgia. 2023. "Routes and Schedules." https://xpressga.com/routes/.*

7. Evaluation Findings

Potential impacts of tolling under the Preferred Alternative have been evaluated for low-income populations from two perspectives. First, key factors in the planning of the proposed tolling facility could have implications for low-income users, from transit policies and availability of cash options to the accessibility of EL access points by low-income populations. Such considerations are identified by FHWA as described in **Section 7.1**. Secondly, understanding public sentiment about existing tolling facilities can help identify perceptions among low-income populations. To that extent, Georgia DOT has completed surveys related to the use of and perceptions of three existing EL systems within the Atlanta region. The surveys and final report for each of the three systems are described in **Section 7.2**.

7.1 FHWA Considerations

The FHWA has developed a list of suggested considerations to be made when evaluating a proposed tolling project's potential impacts on low-income populations.[23] Though this is not the only criteria that should be used, the topics are comprehensive and focus on the following: location of tolled facilities, alternatives to the tolled facilities, associated costs, and the process for identifying low-income populations. The actual toll rate range (and associated caps) for the Proposed Project would be determined during the procurement process and approved by the SRTA Board prior to the execution of any contract(s) for construction and/or operations of the Proposed Project. The tolls rates and ranges would be regulated by contract and would include both a) overall caps on toll rates and b) controls to ensure that toll rates are linked to maintaining operating speed and traffic volume performance requirements. Low-income populations were considered in the planning of the Proposed Project, as shown in **Exhibit 7-1**.

Exhibit 7-1: Considerations for I-285 Top End EL Implementation

Consideration	I-285 Top End Evaluation
Available non-tolled facilities	The Proposed Project would maintain the existing number of non-tolled GP lanes.
Travel time differences between tolled and non-tolled routes	In 2050 Preferred Alternative conditions, tolled routes would offer travel times approximately half the duration of trips in the GP lanes. GP lanes would see a reduction in travel times of between 10% and 24% from the 2050 No-Build to 2050 Preferred Alternative condition.
Transit vehicle toll policies	Georgia DOT has coordinated with local transit agencies (Xpress, MARTA, etc.) and will encourage transit use of tolled lanes by allowing transit vehicles to use them at no cost. Users of registered transit vehicles participating in the use of toll lanes will incur no additional cost.
Methods of toll collection	Tolls are collected via transponders electronically. Users have the option of establishing a pre-paid PeachPass account linked to a credit card or using BancPass Pay n Go passes (for all users) which can be purchased and reloaded with cash at participating stores, Peach Pass Retail Centers, or online. [a]

[23] Federal Highway Administration (FHWA). 2016. *Environmental Justice and Tolling: A Review of Tolling and Potential Impacts to Environmental Justice Populations*. December. https://www.fhwa.dot.gov/environment/environmental_justice/publications/ej_and_tolling/ejandtolling.pdf.

Exhibit 7-1: Considerations for I-285 Top End EL Implementation (continued)

Consideration	I-285 Top End Evaluation
Cost differences when acquiring tag with credit vs. cash	Paying for a transponder with cash or credit at a BancPass Pay n Go location requires a $5.00 activation fee with a minimum balance requirement of $15. Using an online PeachPass prepaid account with a registered credit card requires a starting balance of $20 and a low-balance minimum of $10.[a]
Mitigation measures to address potential impacts on low-income populations	Low-income toll users who do not use credit cards have the option to use cash to load their Peach Pass at SRTA retail centers and participating retail stores or they may purchase a BancPass Pay n Go at participating stores and not tie the purchase to a bank or credit card. SRTA will continue to provide multiple payment options (including a cash payment option in line with industry standards).
Expected use of toll revenues	Tolls that any developer would charge users of the Proposed Project would be regulated by contract and would include both (a) overall caps on toll rates and (b) controls to ensure that toll rates are linked to maintaining operating speed and traffic volume performance requirements. The actual toll rate range (and associated caps) for the Proposed Project would be determined during the procurement process and approved by the SRTA Board prior to construction and operation.
Toll rates and/or toll ranges	Tolls would be regulated by contract and would include both a) overall caps on toll rates and b) controls to ensure that toll rates are linked to maintaining operating speed and traffic volume performance requirements. The actual toll rate range (and associated caps) for the Proposed Project would be determined during the procurement process and approved by the SRTA Board prior to the execution of any contract(s) for the construction and/or operation of the Proposed Project.
Low-income data by TAZ	TAZ data from ARC was used to identify demographic data, using the ARC MMIP v2022 Travel Demand Model.
Location of tolling facilities (Proposed Access and Exit Points)	Tolls would be charged based on the distance traveled. Access and exit points would include: Northwest Corridor ELs SR 400 GP and ELs I-85 ELs Cumberland Boulevard (I-285) Johnson Ferry Road (SR 400)[b] Mt. Vernon Highway (SR 400)[b] Perimeter Center Parkway (I-285) North Shallowford Road (I-285) Flowers Road (I-285) [b] New Peachtree Road (I-285)[b]
Potential economic impact on individuals	Toll rates will vary by time of day and level of congestion. Economic impacts on individual users will depend on their travel patterns and the frequency of using the ELs. Transit users will benefit from reduced travel times and increased trip reliability.
Identification of potential users and travel time changes	Select Link Analysis shows that trips would generate from the entire corridor, with a mix of trips from TAZs above/below the poverty level that is proportionate to overall household distribution.
Travel Demand Model used	Atlanta Regional Commission's ABM, adapted as MMIP v2022 (2015 Base Year, 2050 Future Year)

Source: Federal Highway Administration (FHWA). 2013. Guidebook for State, Regional, and Local Governments on Addressing Potential Equity Impacts of Road Pricing. FHWA-HOP-13-033. April. https://ops.fhwa.dot.gov/publications/fhwahop13033/ch4.htm#s41.

[a] BancPass.com. 2020. "The Pay n Go by Peach Pass Program is now BancPass Pay n Go." August. https://www.bancpass.com/bancpass-launches-new-pay-n-go-program/.

[b] Access within 1 mile of low-income TAZ.

[c] Peach Pass Retail Center. n.d. "Express Lane Travel Data." Peach Pass Retail Center website. https://www.peachpass.com/travel-data/.

7.2 Georgia State University/Georgia DOT Study

Georgia DOT, in partnership with Georgia State University (GSU), conducted surveys to determine how low-income and non-low-income users experience express lanes 1 year before and for 3 years after opening to traffic for the I-75 South, I-75 NWC, and I-85 HOT EL extension projects. The I-75 South ELs are 12 miles from SR 155/McDonough Road to SR 138/Stockbridge Highway in Henry County. The I-75 NWC ELs are 29.7 miles long along I-75 from Akers Mill Road to Hickory Grove Road and I-575 from I-75 to Sixes Road. The I-85 HOT EL extension is the addition of 10 miles of express lanes north of the existing 15-mile corridor from Chamblee Tucker Road to Old Peachtree Road. The extension extends from Old Peachtree Road to Hamilton Mill Road. Based on this data collection, GSU conducted statistical tests to determine the degree to which users of various populations differ in their attitudes and behaviors, culminating in a trend analysis to determine whether any statistically significant differences represent impacts on low-income populations. **Attachment 1, Environmental Justice Post-Open Surveys of Georgia Express Lanes**, includes summaries of the survey findings.

A baseline survey and three annual surveys were conducted and documented for each open section of ELs to compare experiences of low-income and non-low-income groups based on whether and how they use ELs. The findings from these surveys are summarized in **Exhibit 7-2**.

The findings of the GSU study show that although some statistically significant differences in attitudes between non-low-income and low-income groups were identified about use of ELs, those differences do not result in any disproportionate burdens on low-income populations. The GSU study concluded that there are no discernible EJ group inequities arising from the three regional metro Atlanta express lanes, and commute times for all travelers improved. This conclusion holds across diverse subregions in the northwest, northeast, and southeast areas of Metro Atlanta, which gives a high level of confidence that the findings are universal. Further, the findings indicate that estimated travel times would improve compared to the baseline, regardless of poverty status.

1

Exhibit 7-2: Low-Income Tolling Survey Results

EL Section	Baseline	Year 1	Year 2	Year 3
	Statistically significant differences between low-income and non-low-income populations?			
I-75 South Express Lanes	*User Attitudes/Behaviors:* No *Commuting Attitudes/Preferences:* Members of EJ groups are less likely to respond that they can afford ELs but are unwilling to use them *Use of ELs/Transponder Ownership/Estimated Changes in Travel Times:* No	*User Attitudes/Behaviors:* No *Commuting Attitudes/Preferences:* No *Use of ELs / Transponder Ownership/Estimated Changes in Travel Times:* No	*User Attitudes/Behaviors:* No *Commuting Attitudes/Preferences:* No *Use of ELs/Transponder Ownership/Estimated Changes in Travel Times:* No	*User Attitudes/Behaviors:* No *Commuting Attitudes/Preferences:* Non-EJ group members are significantly more likely to agree or strongly agree that, while they can afford the toll lanes, they would not use them. Members of EJ groups are less likely to say they chose where they live for the good school districts compared to non-EJ group members. *Use of ELs/Transponder Ownership/Estimated Changes in Travel Times:* No
Northwest Corridor Express Lanes	*User Attitudes/Behaviors:* No *Commuting Attitudes/Preferences:* No *Use of ELs/Transponder Ownership/Estimated Changes in Travel Times: No*	*User Attitudes/Behaviors:* Low-income respondents are more likely to agree or strongly agree that ELs would improve traffic for all. *Commuting Attitudes/Preferences:* Non-low-income respondents are more likely to say they spend too much time in traffic. *Use of ELs/Estimated Changes in Travel Times:* No *Transponder Ownership:* Low-income respondents are less likely to own a transponder.	*User Attitudes/Behaviors*: The amount of time it takes to get to work if there is no traffic is significantly less for EJ groups compared to that of non-EJ groups. *Commuting Attitudes/Preferences*: EJ group members were more likely to say commuting is frustrating compared to non-EJ group members. *Use of ELs/Transponder Ownership/Estimated Changes in Travel Times*: No	*User Attitudes/Behaviors:* EJ group members are much more likely to use the NWC Express Lanes for other, non-work reasons (under the Race and Poverty definition of EJ). *Commuting Attitudes/Preferences:* EJ group members were more likely to choose where to live because it is near to public transit. EJ group members are more likely to choose a home based on knowing an area well compared to non-EJ group members (under the Race and Poverty definition of EJ). *Use of ELs/Transponder Ownership/Estimated Changes in Travel Times:* No

Exhibit 7-2: Low-Income Tolling Survey Results (continued)

EL Section	Baseline	Year 1	Year 2	Year 3
	Statistically significant differences between low-income and non-low-income populations?			
I-85 HOT ELs Extension	*User Attitudes/Behaviors:* Low-income respondents are more likely to agree that "I can't afford to take toll lanes," and less likely to agree that "Express lanes will improve traffic for all." Low-income respondents are more likely to agree that the existing I-85 HOT ELs did not improve commute times for all. Low-income respondents were less likely to agree that the existing I-85 HOT ELs improved commute times for those who used it for all commuters. Low-income respondents were less likely to agree that they were not familiar with the existing I-85 HOT ELs. *Use of ELs/Transponder Ownership/Estimated Changes in Travel Times: No*	*User Attitudes/Behaviors:* No *Commuting Attitudes/Preferences:* EJ group members are more likely to agree that commuting is stressful compared to non-EJ group members (under the Poverty-only EJ definition). *Use of ELs/Transponder Ownership/Estimated Changes in Travel Times: No*	*User Attitudes/Behaviors:* No *Commuting Attitudes/Preferences*: Low-income respondents are statistically more likely to have a longer morning commute to work and less likely to make it to work on time (under the poverty-only EJ definition) compared to non-EJ group members. EJ group members are more likely to agree that commuting is stressful; that commuting is frustrating; that they could not afford to take toll lanes; and that they chose their home because it was in a good school district compared to non-EJ group members (under the Poverty-only EJ definition). *Use of ELs/Transponder Ownership/Estimated Changes in Travel Times: No*	*User Attitudes/Behaviors:* No *Commuting Attitudes/Preferences:* Non-EJ group members are more likely to agree that they cannot afford to use the express lanes compared to EJ group members (under the Poverty-only EJ definition. *Use of ELs/Transponder Ownership/Estimated Changes in Travel Times: No*

1 *Source: GDOT. Summaries of Low-Income Survey Reports by Georgia State University. 2019-2022.*

8. Conclusion

Using the data and tools provided by the ARC and U.S. Census Bureau, the evaluation illustrates the presence of low-income populations throughout the Proposed Project corridor and the frequency at which they may use the ELs proposed under the Proposed Project. In addition, the socioeconomic background of potential users was considered when planning the Proposed Project.

The corridor is economically diverse, with a concentration of lower-income areas found near the I-285/I-75 interchange, the I-285/Roswell Road interchange, the I-285/SR 400 interchange, and along the I-85 and Buford Highway corridors to the north and south of I-285. Approximately 53% of all households in the AOI are located within a TAZ that is above the regional average share for the poverty rate. These areas would be expected to account for nearly 40% of the EL trips generated within the AOI. The benefits of the ELs are anticipated to be shared by individuals from all economic backgrounds, as the travel time savings would apply to users of both the ELs and GP lanes. The value given to those savings independent of an individual's socioeconomic background would ultimately determine their usage of the ELs.

This report indicates that the implementation of new, tolled capacity is anticipated to generate adverse effects on all users, including low-income populations, due to the addition of a toll fare. However, there would be no disproportionate effect on low-income users compared to effects on non-low-income populations. The GP lanes show the same or improved travel times with the Proposed Project in place, and data analysis shows the low-income TAZs use the ELs proportionally to other TAZs in the study area (refer to **Draft EIS Appendix H-4, Transportation Systems Report**). The Proposed Project would maintain the same number of existing, non-tolled, GP lanes, which would be anticipated to experience improved travel times due to the proposed ELs. Furthermore, transit users would be able to share the same benefits as those in personal vehicles while paying their normal fees, avoiding the toll, and still obtaining reliable trip times to their destination. In addition, SRTA has implemented programs, such as BancPass Pay n Go, to make Peach Pass transponders readily available to the public and has created payment systems and locations for customers who prefer to pay cash or pay only as needed. The rates paid are not anticipated to disproportionately result in an economic impact on low-income individuals, as the use of the proposed ELs would be at the discretion of the individual. Finally, the locations of four of the seven proposed access points occur at or near exits located in or adjacent to TAZs designated as low-income. The presence of access points near these areas, such as the half-diamond interchange combination of west-facing Flowers Road and east-facing New Peachtree Road, would provide the opportunity to easily enter the EL system if the user chooses. Moreover, the modeled conditions indicate that users of arterial roadways near the ELs would experience an overall slight reduction in congestion compared to the No-Build Alternatives, even if their daily commute trips remain on local routes instead of using I-285.

This low-income tolling evaluation for the Proposed Project is one component of the EJ analysis conducted as part of the EIS (refer to **Draft EIS Section 3.3, Environmental Justice and Communities of Concern,** and **Appendix H-2, Demographic, Social, Economic, and Community Profile Analysis**).

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ATTACHMENT 1:
ENVIRONMENTAL JUSTICE POST-OPEN SURVEYS OF GEORGIA EXPRESS LANES

Memorandum

Program:	MMIP – Top End EL	**Date:**	3/13/2023
To:	Tim Hatton, Liz Hartzog	**From:**	Iris Ortiz
Subject:	Top End DEIS – EJ and Tolling Report		

UPDATES FROM RECENT EJ REPORTS

Please find below some excerpts on findings from EJ post-open survey reports submitted and accepted by FHWA since March 2020.

I-75 SOUTH METRO EXPRESS LANES

Year 3 Survey (March 2021)

- Use of Express Lanes and transponder ownership: No statistically significant differences
- Commuting Attitudes and Preferences:
    - Non-EJ group members are significantly more likely to agree or strongly agree that while they can afford the toll lanes, they would not use them.
    - Members of EJ groups are less likely to say they chose where they live for the good school districts compared to non-EJ group members.

Trend Report (April 2021)

- Commuting behavior trends:
    - EJ groups had a statistically shorter commute time both before and after the opening of the I-75 South Metro Express Lanes.
    - The difference in commute times between EJ groups did not vary over time, therefore, the opening of the express lanes did not disadvantage EJ group members regarding commute times on I-75 in the South Metro region.
- Attitudes, preferences, and perceptions:
    - On average, respondents thought their commute had improved slightly, and there were no EJ group differences in perception of commute improvements.
    - Respondents at Year 1 post-opening were significantly more likely to perceive their commute as having improved compared to respondents at Year 3.

- No attitudes or perceptions of the new I-75 South Metro Express Lanes were found that demonstrated a potential source of inequity for EJ groups.

NORTHWEST CORRIDOR EXPRESS LANES

Year 2 Report (July 2021)

- Use of Express Lanes and transponder ownership: No statistically significant differences
- Driving patterns:
  - The amount of time it takes to get to work if there is no traffic is significantly less for EJ groups compared to that of non-EJ groups.
- Commuting attitudes and preferences:
  - EJ group members were more likely to say commuting is frustrating compared to non-EJ group members.

Year 3 Report (October 2022)

- Use of Express Lanes and transponder ownership:
  - EJ group members are much more likely to use the NWC Express Lanes for other, non-work reasons (under the Race and Poverty definition of EJ).
- Driving patterns: No statistically significant differences.
- Commuting attitudes and preferences:
  - EJ group members were more likely to choose were to live because it is near to public transit.
  - EJ group members are more likely to choose a home based on knowing an area well compared to non-EJ group members (under the Race and Poverty definition of EJ).

I-85 EXPRESS LANES EXTENSION

Year 1 Report (March 2021)

- Use of EL and transponder ownership: No statistically significant differences
- Driving patterns: No statistically significant differences
- Commuting attitudes and preferences:
  - EJ group members are more likely to agree that commuting is stressful compared to non-EJ group members (under the Poverty-only EJ definition).

Year 2 Report (October 2021)

- Use of EL and transponder ownership: No statistically significant differences

- Driving patterns:
    - EJ group members are statistically more likely to have a longer commute to work in the morning compared to non-EJ group members.
    - EJ group members are less likely to make it to work on time (under the poverty-only EJ definition) compared to non-EJ group members.
- Commuting attitudes and preferences:
    - EJ group members are more likely to agree that commuting is stressful compared to non-EJ group members.
    - EJ group members are more likely to agree that commuting is frustrating compared to non-EJ group members (under the Poverty-only EJ definition).
    - EJ group members were more likely to agree they could not afford to take toll lanes compared to non-EJ group members (under the Poverty-only EJ definition).
    - EJ group members were more likely to agree they chose their home because it was in a good school district compared to non-EJ group members (under the Poverty-only EJ definition).

Year 3 Report (October 2022)

- Non-EJ respondents were statistically more likely to be eligible for the study compared to EJ status members (for the Poverty-only EJ definition).
    - Of the 70 respondents who completed the survey, only 11% (8 respondents) use I-85 to commute to work.
- Use of EL and transponder ownership: No statistically significant differences
- Driving patterns: No statistically significant differences.
- Commuting attitudes and preferences:
    - Non-EJ group members are more likely to agree that they cannot afford to use the express lanes compared to EJ group members (under the Poverty-only EJ definition.

Memorandum

TO: RICHARD O'HARA

FROM: JOHN FREYERMUTH

SUBJECT: EXCERPTS FROM EJ POST-OPEN SURVEYS OF GEL PRELIMINARY FINDINGS

SUMMARY

Currently, Georgia State University (GSU) conducts in-person interviews to discover how both low-income and non-low-income status respondents experience express lanes one year before and three years after opening to traffic. After data collection, GSU conducts statistical tests to determine the degree to which users of various populations differ in their attitudes and behaviors, culminating in a trend analysis to determine whether any statistically significant differences represent impacts to low-income populations. The post-opening surveys fulfill environmental commitments for each open express lane facility by monitoring effects to low-income populations and providing essential findings for express lanes planning and implementation moving forward.

The survey findings are reported with respect to statistical significance, or significance testing. Generally, for every survey question, the research hypothesis states that a difference exists between the low-income and non-low-income groups' response. Conversely, the null hypothesis states that there is no difference between the two groups' response. If GSU researchers find that a question's results are statistically significant, they can reject the null hypothesis that no differences exist. In other words, a statistically significant result means the observed difference may exist between the two groups.

On the other hand, if a question's results are not found to be statistically significant, the research team cannot reject the null hypothesis that no difference exists, therefore the observed differences in the actual responses could be inconclusive. Once all survey years are complete, a trend analysis will determine if the findings from year to year represent impacts to low-income populations within each corridor and across the region.

The following excerpts summarize findings for each survey year completed as of March 23, 2020. These findings are preliminary components of an ongoing trend study that provide a point-in-time view of responses and do not represent definitive regional findings.

I-75 SOUTH EXPRESS LANES

Facility Overview

The I-75 Express Lanes is Georgia's first reversible toll lanes project. The project limits extend 12 miles from SR 155/McDonough Road to SR 138/Stockbridge Highway in Henry County. The reversible lanes are barrier separated and open to northbound traffic in the morning and southbound traffic in the afternoon to help improve traffic flow during peak period times. To access the I-75 Express Lanes, commuters are required to pay a toll using a Peach Pass transponder. Motorists with a registered, active Peach Pass (or a valid interoperable toll pass from Florida or North Carolina) can access the lanes. Vehicles with six or fewer wheels are allowed in the Express Lanes with a valid Peach Pass; tractor trailers are not allowed. State-registered alternate fuel vehicles (AFVs), motorcycles and carpools must pay tolls on the lanes. The toll amount is determined through dynamic pricing with the cost rising as express lanes demand increases and falling as demand decreases. State-registered transit vehicles and vanpools, registered law enforcement and emergency vehicles are the only vehicles that are exempt from paying a toll on the I-75 South Metro Express Lanes.

Baseline Survey

While there are differences in attitudes and similarities in behavior based on EJ status, it is indeterminate from the data collected thus far whether toll-lane implementation will affect people of EJ or non-EJ distinction uniformly or disproportionately.

Year 1 Survey

- For users' attitudes and behaviors, no statistically significant differences exist between low-income and non-low-income groups.
- For commuting attitudes, no statistically significant differences exist between low-income and non-low-income groups.
- For use of the express lanes, as well as transponder ownership, no statistically significant differences exist between low-income and non-low-income groups.

Year 2 Survey

- For users' attitudes and behaviors, no statistically significant differences exist between low-income and non-low-income groups.
- For commuting attitudes, no statistically significant differences exist between low-income and non-low-income groups.
- For use of the express lanes, as well as transponder ownership, no statistically significant differences exist between low-income and non-low-income groups.

NORTHWEST CORRIDOR EXPRESS LANES

Facility Overview

The Northwest Corridor (NWC) Express Lanes provide 29.7 miles of reversible express lanes along I-75 from Akers Mill Road to Hickory Grove Road, and along I-575 from I-75 to Sixes Road in Cobb County. The reversible lanes are barrier separated and open to southbound traffic in the morning and northbound traffic in the afternoon to help improve traffic flow during peak period times. To access the Northwest Corridor Express Lanes, commuters are required to pay a toll using a Peach Pass transponder. Motorists with a registered, active Peach Pass (or a valid interoperable toll pass from Florida or North Carolina) can access the lanes. Vehicles with six or fewer wheels are allowed in the Express Lanes with a valid Peach Pass; tractor trailers are not allowed. State-registered alternate fuel vehicles (AFVs), motorcycles and carpools must pay tolls on the lanes. The toll amount is determined through dynamic pricing with the cost rising as express lanes demand increases and falling as demand decreases. State-registered transit vehicles and vanpools, registered law enforcement and emergency vehicles are the only vehicles that are exempt from paying a toll on the Northwest Corridor Express Lanes.

Baseline Survey

- For users' attitudes and behaviors, no statistically significant differences exist between low-income and non-low-income groups.
- For commuting attitudes, no statistically significant differences exist between low-income and non-low-income groups.
- For use of the express lanes, no statistically significant differences exist between low-income and non-low-income groups.

Year 1 Survey

- For express lanes attitudes and behaviors, the following statistically significant differences exist between low-income and non-low-income groups:
  - Low-income respondents are more likely to agree or strongly agree that express lanes would improve traffic for all.
- For commuting and traffic statements, the following statistically significant differences exist:
  - Non-low-income respondents are more likely to say they spend too much time in traffic.
- For use of the express lanes, no statistically significant differences exist between low-income and non-low-income groups.
- For transponder ownership, the following statistically significant differences exist:
  - Low-income respondents are less likely to own a transponder.

I-85 EXTENSION

Facility Overview

The I-85 Express Lanes Extension adds 10 miles north of the existing I-85 Express Lanes—high occupancy toll (HOT) lanes opened in 2011, made up of a 15-mile corridor that runs from Chamblee Tucker Road (just south of I-285) to Old Peachtree Road. The I-85 Express Lanes Extension is grade separated and extends from Old Peachtree Road to Hamilton Mill Road. To access the I-85 Express Lanes Extension, commuters are required to pay a toll using a Peach Pass transponder. Eligible carpoolers, transit, vanpool, and motorcycles can use the lane for free, while allowing vehicles with one or two passengers to use the express lane for a fee. The toll amount is determined through dynamic pricing with the cost rising as express lane demand increases and falling as demand decreases. Transit, three or more person carpools, motorcycles, emergency vehicles and Alternative Fuel Vehicles (AFV) with the proper AFV license plate (does not include hybrid vehicles) can use the lanes toll-free.

Baseline Survey

- For express lanes attitudes and behaviors, the following statistically significant differences exist between low-income and non-low-income groups:
  - Low-income respondents are more likely to agree that, *"I can't afford to take toll lanes,"* and less likely to agree that, *"Express lanes will improve traffic for all."*
  - Low-income respondents are more likely to agree that the existing I-85 Express Lanes did not improve commute times for all.
  - Low-income respondents were less likely to agree that the existing I-85 Express Lanes improved commute times for those who used it or for all commuters.
  - Low-income respondents were less likely to agree that they were not familiar with the existing I-85 Express Lanes.
- For use of the express lanes, no statistically significant differences exist between low-income and non-low-income groups.

ATTACHMENT 2:
FHWA ACCEPTANCE OF ENVIRONMENTAL JUSTICE EXPRESS LANE STUDY TREND REPORTS

U.S. Department of Transportation
Federal Highway Administration

Georgia Division

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May 4, 2023

In Reply Refer To:
HPD-GA

Eric Duff
State Environmental Administrator
Georgia Department of Transportation
600 W. Peachtree Street, N.W.
Atlanta, GA 30308

Dear Mr. Duff:

We are in receipt of your agency's request dated April 10, 2023, to review the Environmental Justice (EJ) Express Lane Study Trend Reports for the Georgia Department of Transportation (GDOT) PIs 0015770/0015771/0015772, located in Cherokee, Clayton, Cobb, Gwinnett, and Henry Counties, Georgia. The purpose of these studies is to determine if there is an unequal distribution of benefits and burdens for EJ populations associated with Express Lane Projects in the Atlanta metropolitan area. These studies were included as an environmental commitment on the following projects.

- PI 0009156/0009157 – I-75 South Express Lane Project
- PI 110600 – I-85 HOT Lane Extension Project
- PI 0008256 – Northwest Corridor Project

We have reviewed the Trend Reports for these projects and have no further comments. In addition, we have determined that the Trend Reports satisfy the commitments made on the above referenced projects. In accordance with the commitment made on each project, please ensure that the Trend Reports are posted to the State Road and Tollway Authority (SRTA) and GDOT websites. If you have any questions or require additional information, please feel free to contact Aaron Hernandez at (404) 562-3584 or by email at aaron.hernandez@dot.gov.

Sincerely,

Chetna Dixon-Thomas
Environmental Team Leader

Ec: Rick O'Hara, GDOT Office of Alternative Delivery
Amber Phillips, GDOT Office of Environmental Services