

8. Recommendation for Environmental Documentation

As stated in Chapter 1, the purpose of this report is to review changed conditions since the May 2007 publication of the *Northwest I-75/I-575 Corridor AA/DEIS* that require reconsideration and refinement of the build alternatives evaluated in the AA/DEIS, to identify potential environmental impacts associated with the refined build alternatives, and to describe GDOT's justification for addressing the refinements in a Final Environmental Impact Statement (FEIS). This chapter presents GDOT's justification for completing the environmental review of the proposed project through preparation of a FEIS.

8.1 Reconsideration of Project Alternatives

Chapter 2 of this report described the several build alternatives, design, and operation options evaluated in the AA/DEIS, but Chapter 3 presented a number of changed conditions that has lead to GDOT's reconsideration of reasonable alternatives for the Northwest Corridor Project. Comments on the AA/DEIS spoke out against elements of the project alternatives evaluated in the AA/DEIS. Comments expressed concern about undocumented project impacts and financial feasibility of the proposed alternatives. Since publication of the AA/DEIS in May 2007, a number of transportation planning agencies have completed studies on transit facilities, highway managed-lanes, and the use of truck-only lanes – all elements of alternatives evaluated in the AA/DEIS. More importantly, changed economic conditions were pressuring GDOT to seek out lower-cost project alternatives. Key to understanding the true transportation effectiveness of the alternatives also needed to be determined using the new ARC 2008 Travel Demand Forecasting Model.

Preliminary analysis through 2035 showed trends that differed from the results using the older ARC 2004 Travel Demand Forecasting Model. Some analysis conducted just prior to the publication of the AA/DEIS also showed substantial "latent" demand due to large portion of motorists using parallel arterial roadways due to heavy peak period traffic congestion and unreliable travel time. Together, the project team re-examined the potential implementation of a reversible-lane concept for the project corridor, despite the fact that this concept had previously been eliminated from detailed evaluation.

Two reversible-lane concepts were developed and tested using the new 2008 Travel Demand Forecasting Model. These concepts included a two-lane reversible-lane system with two design options for access and a three-lane reversible-lane system. Whereas the earlier reversible-lane concept showed strong peak period directional flows in the base year, the long-term forecast indicated traffic-flow splits would generally be 57/43 or less. This did not meet accepted guidelines for optimal conditions with a 65/35 directional split during peak periods. The 2008 Travel Demand Forecasting Model, however, showed each of the two reversible-lane concepts were potentially feasible long-term due to higher directional flow splits during peak periods. At certain locations on I-75



and I-575, the long-term forecast traffic directional split during peak periods substantially exceeded the guidelines.

The review of the traffic forecasting results furthermore showed that the two reversible-lane concepts outperformed both the HOV/TOL Alternative and the bi-directional concept, Concept A. Meeting or exceeding the transportation effectiveness measures confirmed these new build concepts met the project's purpose and need. With fewer travel lanes, the reversible-lane concepts also would cost less to construct, while providing similar or improved transportation service.

In fact, the less expensive three-lane managed-lane system Concept C was forecast to have a daily VMT of about 4,223,000. This measure of overall transportation effectiveness is only slightly less than the more expensive four-lane managed system Concept A, which was forecast to have a VMT of 4,240,000. Moreover, the 2035 daily managed-lane VMT for Concept C was forecast to be over 38 percent higher than Concept B and 95 percent of the daily managed-lane VMT per lane mile compared to Concept B. This analysis indicates the potential ability of Concept C to capture greater toll revenue than Concept B.

These findings have led GDOT to re-consider the project alternatives and pursue a reversible-lane concept for the Northwest Corridor Project. And, GDOT plans to select the preferred alternative based on detailed revenue-cost analysis examining the entire life of the proposed project from opening year to horizon year. This will ensure GDOT selects a financially feasible preferred alternative for evaluation in the upcoming environmental documentation.

8.2 The NEPA Regulatory Framework Moving Forward

At this stage in the project study, it has been determined that the reversible-lane concepts meet the project purpose and need, provide superior transportation improvements, and provide these benefits for substantially less cost. Review of the NEPA regulations will help determine the appropriate next step in the environmental review process.

The Federal Highway Administration (FHWA), the lead federal agency for preparation of the AA/DEIS, has regulations that address this question. Title 23 *Code of Federal Regulations* (CFR) Part 771, Section 771.130(a) states,

An EIS shall be supplemented whenever the Administration determined that:

- (1) Changes to the proposed action would result in significant environmental impacts that were not evaluated in the EIS; or
- (2) New information or circumstances relevant to environmental concerns and bearings on the proposed action or its impacts would result in significant environmental impacts not evaluated in the EIS.

However, per 23 CFR Part 771, Section 771.130(b), the regulations also state,

a Supplemental EIS will not be necessary where:

- (1) The changes to the proposed action, new information, or new circumstances result in a lessening of adverse environmental impacts evaluated in the EIS without causing other environmental impacts that are significant and were not evaluated in the EIS.

The regulations go on to state that if FHWA is uncertain of the significance of the new impacts, the applicant will develop additional environmental studies or an Environmental Assessment (EA) to assess the impacts of the changes, new information, or new circumstances.

In this case, however, the project team has performed some preliminary engineering for the reversible-lane concepts. This information was used in Chapter 6 to assess potential environmental effects of these concepts. This effort identifies the likely environmental impacts and magnitude of these impacts. As such, the preparation of an EA would not be the appropriate next step in the project environmental review process. The likely environmental effects of the reversible lanes are summarized in the section below and are used in the subsequent section to determine whether or not the next phase of the environmental review should be a SDEIS or an FEIS.

8.3 Environmental Impacts of the Reversible-Lane Concepts

Chapter 6 compares and contrasts the potential environmental impacts of the no build condition, the HOV/TOL Alternative, the bi-directional concept, and the three reversible-lane concepts. But, as discussed in Section 8.1, the transportation measure performance of the reversible-lane concepts is superior to both the HOV/TOL Alternative and the bi-directional concept, Concept A. So, the important comparison of environmental impacts must now look at how the reversible-lane concepts compare against the HOV/TOL Alternative to assess if the reversible-lane concepts would have less environmental impact than the AA/DEIS alternative. If so, the project team should proceed with the preparation of a FEIS consistent with FHWA regulations.

The environmental analysis of the reversible-lane concepts examined all elements of the environment, including construction, indirect, and cumulative impacts (see Table 6-1). These were all the same elements of the environment used to evaluate the HOV/TOL Alternative in the AA/DEIS. Compared to this alternative, the impacts of the reversible-lane concepts can be briefly summarized as follows:

- The reversible-lane concepts would have less adverse effects on transportation traffic issues compared to the HOV/TOL Alternative, but are similar for transportation transit, freight, and safety issues.

- The reversible-lane concepts would have similar land use effects compared to the HOV/TOL Alternative for land use impacts.
- The reversible-lane concepts rate substantially better than the HOV/TOL Alternative due to fewer adverse effects from property acquisition and the associated effects on population, employment, the economy, and neighborhoods and community facilities. The HOV/TOL Alternative would require 130 acres affecting 290 parcels compared to less than 13 acres affecting less than 60 parcels for either Concept B or Concept C.
- Neither the reversible-lane concepts nor the HOV/TOL Alternative would have impacts to parklands or other Section 4(f) properties, including historic and archaeological resources.
- All build alternatives will have similar air quality improvements over the No-Build Alternative.
- The reversible-lane concepts would have less noise and vibration, ecosystem, and water resource impacts than the HOV/TOL Alternative.
- The reversible-lane concepts would have fewer impacts to geology, soils, and hazardous materials compared to the HOV/TOL Alternative.
- The two-lane reversible concepts would have similar safety and security impacts compared to the HOV/TOL Alternative, but the three-lane reversible-lane system, Concept C, would have less impact.
- The elevated two-lane concepts would have substantially less construction impacts than the HOV/TOL Alternative, and the three-lane reversible concept would have somewhat less construction impacts than the HOV/TOL Alternative.
- The reversible-lane concepts would have fewer adverse effects from indirect and cumulative impacts compared to the HOV/TOL Alternative.

Clearly, all of the reversible-lane concepts would overall result in less environmental impacts than the HOV/TOL Alternative evaluated in the AA/DEIS.

8.4 Recommendation to Prepare a FEIS

In conclusion, it is recommended that the appropriate next step in the environmental review process for the Northwest Corridor Project is the preparation of a FEIS. The three reversible-lane concepts meet the project purpose and need similar to the other alternatives evaluated in the AA/DEIS. They generally perform better than the AA/DEIS alternatives in the transportation effectiveness measures. And, overall they would result in less environmental impacts. Additional review of the three reversible-lane concepts, however, is necessary to identify the most desirable concept to pursue.

This final selection of a single reversible-lane concept as the preferred alternative will be based on a financial analysis. This is consistent with GDOT's new commitment to have the most cost-effective alternative considering reduced revenues for State transportation projects and limited funding opportunities. Following this financial analysis, GDOT's decision-making board will be able to adopt the preferred alternative and efforts to prepare the FEIS can begin.

8.5 The Next Steps

The next steps for GDOT in development of the Northwest Corridor Project include the following:

- Obtain concurrence from FHWA for the preparation of an FEIS
- Initiate agency coordination meetings
- Prepare the revenue-cost analysis required to select a financially feasible preferred alternative
- Address comments from GDOT and FHWA
- Prepare the Administrative Draft FEIS for review by GDOT and FHWA
- Hold public information open house meetings to present changes in the proposed project and selection of the preferred alternative
- Prepare the IJR/IMR Report for the project corridor
- Respond to comments from GDOT and FHWA
- Publish the FEIS, issue the notice of availability, and distribute copies to the public and agencies
- Address any public and agency comments on the FEIS in the Record of Decision (ROD)
- Prepare the ROD for review and issuance by FHWA
- Take formal project action on the preferred alternative (e.g. purchase right-of-way, start final engineering, etc.)



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