BELTLINE CORRIDOR ENVIRONMENTAL STUDY

ENVIRONMENTAL EFFECTS REPORT – BELTLINE CORRIDOR NORTHEAST ZONE

Prepared for:

Metropolitan Atlanta Rapid Transit Authority
and
Atlanta BeltLine, Inc.

Prepared by:

AECOM/JJG Joint Venture
Atlanta, GA

Version (2.0): May 2009

General Planning Consultant Services RFP P5413
Contract No. 200703566
Work Order No. 2008-07

Page Left Blank

BELTLINE CORRIDOR NORTHEAST ZONE

FULTON COUNTY, GEORGIA

The BeltLine Corridor Northeast Zone Project is an approximate 6.5-mile corridor beginning at the Inman Park/Reynoldstown MARTA Station and extending north to the Lindbergh Center MARTA Station. The proposed project includes a combination of a new Light Rail / Modern Streetcar transit line and new multi-use trails. The rail transit element of the project includes the construction of new tracks, stations, and supporting facilities that will accommodate a new fixed guideway transit service. The project also includes the development of a multi-use trail and associated linear greenspace along the alignment.

ENVIRONMENTAL EFFECTS REPORT

METROPOLITAN ATLANTA RAPID TRANSIT AUTHORITY (MARTA)

ATLANTA DEVELOPMENT AUTHORITY (ADA)

SUBMITTED PURSUANT TO GEORGIA ENVIRONMENTAL POLICY ACT (GEPA), 1991

4/30/09
DATE

Beverly A. Scott
FOR:
GENERAL MANAGER/CHIEF EXECUTIVE OFFICER
METROPOLITAN ATLANTA RAPID TRANSIT AUTHORITY (MARTA)

4/30/09
DATE

Peggy McCormick
FOR:
PRESIDENT
ATLANTA DEVELOPMENT AUTHORITY (ADA)

Page Left Blank

Table of Contents

Appendices

List of Tables

List of Figures

Page Left Blank

1.0 INTRODUCTION

1.1 Project Name and Location

The Metropolitan Atlanta Rapid Transit Authority (MARTA) and the Atlanta Development Authority (ADA), via its planning and implementation agent, Atlanta BeltLine, Inc. (ABI), have prepared an Environmental Effects Report (EER) for the BeltLine Corridor Northeast Zone project in Fulton County, Georgia.

1.2 Facility Type, Termini, Length, Right-of-Way

The proposed project involves construction of a new fixed rail transit guideway and multi-use trails. No existing rail transit guideway currently exists within the BeltLine Corridor, excepting the MARTA heavy rail lines intersecting the corridor. The Northeast Zone of the BeltLine Corridor extends west via DeKalb Avenue NE from the Inman Park/Reynoldstown MARTA Station to the right-of-way (ROW) presently owned by the Atlanta Development Authority (ADA) (as described in the following paragraph), then north via ADA right-of-way to the Armour Drive industrial district and the Lindbergh Center MARTA Station at Lindbergh Drive NE. The Northeast Zone is approximately 6.5 miles long.

Existing right-of-way includes the Atlanta Development Authority property along the former Norfolk Southern railway corridor from DeKalb Avenue NE to a point approximately 0.4 miles north of Montgomery Ferry Road NE. Right-of-way will be necessary within the existing extents of DeKalb Avenue to support in-street transit operations between the Atlanta Development Authority right-of-way and the Inman Park/Reynoldstown MARTA Station. Additional right-of-way acquisition will be necessary to provide a transit station immediately north of Interstate 85 (I-85) at Mayson Street NE and Plasters Avenue NE and to connect the proposed BeltLine transit and trails to the Lindbergh Center MARTA Station, including portions of properties in the Armour Drive industrial district and along the northern bank of Peachtree Creek.

1.3 Study Area and Physical Extent

The general study area for the EER is a one-half mile wide band centered on the BeltLine Corridor. This document specifies the appropriate extents for resource assessments, which may vary from the half-mile study area band depending on the subject resource.

Physical effects from the BeltLine project may occur within the Limit of Disturbance (LOD). In this EER, the LOD represents the likely “footprint” of the project, or the physical extent of the proposed transit track centerlines, passenger stations, and trail configuration with trail access points.

MARTA and ABI prepared a design document, *Preliminary Conceptual Transit and Trail Alignment, Northeast Zone* (April 2009) that complements the EER and establishes the conceptual design assumptions as the basis for EER analyses. The document includes typical sections along exclusive right-of-way and in mixed traffic for transit and trail alignments, as well as plan and profile drawings. Plan sheets include Atlanta Development Authority right-of-way and LOD extents. The design document includes

preliminary layouts for station areas and the Armour Drive maintenance yard. The conceptual design document accompanies the EER on the study website and at public locations.

1.4 Alternatives Considered

1.4.1 Build Alternative

The proposed Build Alternative includes a combination of a new Light Rail/Modern Streetcar transit line and new multi-use trails. The conceptual rail transit guideway includes electrically powered vehicles, overhead wires to deliver the power to the vehicles, stations with platforms to accommodate waiting passengers, and access from the stations to adjacent streets, sidewalks, and pedestrian facilities.

Multi-use trails are pathways shared by pedestrians, pet walkers, skaters, wheelchair users, joggers, bicyclists, and other users who do not rely on conventional motorized vehicles for mobility and passive or active recreation. An open space or barrier physically separates a typical pathway from motorized vehicular traffic. Multi-use trails in the Northeast Zone would create a linear park with connections to parks and recreational areas throughout the study area. In tandem with the transit service, the trail system would connect Atlanta's in-town neighborhoods and the broader pedestrian and bicycle network for the entire metropolitan area.

The alignment in the Northeast Zone would be approximately 6.5 miles long, with at least 12 new stations and stops at two existing MARTA heavy rail stations (Inman Park/Reynoldstown and Lindbergh Center). The BeltLine would connect area neighborhoods and the two existing MARTA heavy rail stations.

To promote connectivity, consolidation of segments or the trail alignment may occur with sidewalks on public rights-of-way where conditions allow and where in-street bicycle lanes are inappropriate. To preserve trail network continuity and connectivity, in-street bicycle lanes may occur where there is insufficient right-of-way for a dedicated multi-use trail.

At the southern end of the Northeast Zone, bicyclists and pedestrians would achieve connections to the Inman Park area and the Inman Park/Reynoldstown MARTA Station through the existing bicycle path along Edgewood Avenue NE and the existing sidewalk network along Decatur Street NE and Edgewood Avenue NE.

1.4.2 No Build Alternative

The EER also includes consideration of a No Build Alternative. Under this alternative, MARTA and ABI would take no action to construct the BeltLine project. The No Build Alternative includes the existing transportation system throughout the corridor study area and the Atlanta region. The No Build Alternative also includes all of the proposed projects listed in the Atlanta Regional Commission (ARC) *Transportation Improvement Program* (TIP) (FY 2008-2013) and within the cost-constrained *Envision6 Regional Transportation Plan* (RTP) (FY 2008-2030), excepting the BeltLine transit and multi-use trails.

1.4.3 Alternatives to Avoid Significant Adverse Effect

The No Build Alternative represents the alternative for avoiding significant adverse effects.

1.5 Environmental Setting

Section 0 of the EER describes the environmental setting for the study area. Within the Northeast Zone is a highly developed urban area. Beyond the abandoned railroad right-of-way is an array of land use and land cover types, including residential, commercial, and industrial properties, transportation and utility right-of-way, and hardwood and mixed pine/hardwood forest land. Long-standing and historic neighborhoods exist throughout the corridor.

Within the Northeast Zone study area, situated in the Upper Chattahoochee River basin, are a number of surface water bodies including eight perennial streams, three intermittent streams, one ephemeral stream, and two wetlands. The corridor also crosses the 100-year floodplains of Peachtree Creek and Clear Creek.

Fourteen parks/recreational areas are within the study area, including ten existing public parks/recreation areas, two planned public parks, and two privately owned recreation areas. Seven of these resources are immediately adjacent to the Northeast Zone right-of-way.

Within the study area are 39 properties either in or eligible for listing in the National Register of Historic Places. Eight archaeological sites are also within a one-kilometer (0.62-mile) radius of the corridor.

Of the 214 hazardous materials sites within the study area, 61 sites and 11 potential brownfields or under-utilized sites were within 200 feet of the proposed Build Alternative alignments. There were no solid waste landfills in the study area.

There are no known energy reserves, such as crude oil or natural gas in the project corridor. The field survey revealed no federal- or state-protected flora, fauna, or appropriate habitats. No protected mountains, critical habitats, beaches, dunes, shorelines, estuaries, forested areas (as defined under GEPA), barrier islands, trout streams, or farmlands exist within the EER study area.

1.6 Environmental Effects

Consistent with Georgia Environmental Policy Act (GEPA) guidance, Table 1-1 provides the standard checklist of environmental effects. The checklist indicates potential effects and their relative severity, and is inclusive of effects resulting from all Northeast Zone alignment and technology options.

Potential effects of the Build Alternative include:

- Impacts to a maximum 414 linear feet of perennial and intermittent streams, due to the provision of new or extended culvert structures where crossed by the BeltLine right-of-way;

Table 1-1: GEPA Environmental Checklist

GEORGIA AREA/CATEGORY	IS AREA AFFECTED?		HOW SEVERE?		
	Yes	No	N/A	Minor	Major
1.Wetlands/Waters of the U.S. and State	☒	☐	☐	☒	☐
2.Floodplains	☒	☐	☐	☒	☐
3.Water Supply	☐	☒	☒	☐	☐
4.Water Resources	☐	☒	☒	☐	☐
5.Groundwater Recharge Area	☐	☒	☒	☐	☐
6.Storm Water	☒	☐	☐	☒	☐
7.Waste Water	☒	☐	☐	☒	☐
8.Air Quality	☒	☐	☐	☒	☐
9.Solid Wastes/Solid Waste Landfills	☒	☐	☐	☒	☐
10.Soil Stability/Erodibility	☒	☐	☐	☒	☐
11.Protected Mountains	☐	☒	☒	☐	☐
12.Endangered Species	☐	☒	☒	☐	☐
13.Critical Habitats	☐	☒	☒	☐	☐
14.Historical	☒	☐	☐	☒	☐
15.Archaeological	☒	☐	☐	☒	☐
16.Parks/Recreation	☒	☐	☐	☒	☐
17.Energy Supplies	☒	☐	☐	☒	☐
18.Beaches	☐	☒	☒	☐	☐
19.Dunes	☐	☒	☒	☐	☐
20.Shoreline	☐	☒	☒	☐	☐
21.Estuary	☐	☒	☒	☐	☐
22.Forest Land	☐	☒	☒	☐	☐
23.Barrier Island	☐	☒	☒	☐	☐
24.Aquatic Life/ Trout Streams	☐	☒	☒	☐	☐
25.Hazardous Materials	☒	☐	☐	☒	☐

- Encroachments of up to 9.75 acres of floodplains near Peachtree Creek and Clear Creek;
- Production of storm water runoff and waste water;
- Emissions of vehicle-borne contaminants into the air;
- Generation of hazardous and/or solid waste;
- Soil erosion due to grading of areas adjacent to existing paving;
- Adverse effect to one historic resource, due to modification of a pedestrian entrance;
- Disturbance of potential archaeological remains;
- Proximity effects (visual, aesthetic and/or vibration) to four parks/recreation resources;
- Removal of temporary venue parking area for one park resource;
- Energy expenditures for vehicles and facilities;
- Relocation of energy transmission and distribution lines; and
- Land disturbance and redevelopment near hazardous materials sites, brownfields and under-utilized industrial locations.

The EER presents more detail on the environmental consequences of the proposed action in Section 4.0.

Each alignment option is adjacent to at least one hazardous materials site and poses potential impacts to floodplains and cultural resources in this area. None of the Build Alternative alignment options would avoid adverse environmental effects in the absence of mitigation strategies.

Minimization and mitigation strategies include:

- Acquisition of 1,306 compensatory stream mitigation credits;
- Coordination with the Federal Emergency Management Agency and Georgia Department of Natural Resources (DNR) during project design to minimize impacts to regulatory floodways;
- Management of storm water runoff resulting from new impervious surfaces;
- Collection and disposal of waste water in accordance with local, state and federal regulations;
- Inclusion of erosion, sedimentation and pollution control measures to prevent contamination of storm water;
- Early re-vegetation of disturbed land areas and application of best management practices during construction to avoid soil erosion and stream pollution;
- Coordination of temporary erosion control measures with permanent erosion control features to assure continuous erosion control following construction;

- Satisfaction of stream buffer variance requirements, in accordance with state erosion and sedimentation control laws;
- Application of design measures to preserve and otherwise re-use historic resources;
- Archaeological investigation and testing prior to construction;
- Coordination with the City of Atlanta and the Piedmont Park Conservancy during project design, to identify alternative venue parking options and protected areas under the Land and Water Conservation Fund;
- Coordination during project design with utility agencies, including Georgia Power, regarding utility relocation, to avoid interruption of energy supplies;
- Identification of potential spills and releases and underground storage tanks at hazardous materials sites, prior to property demolition or land disturbance; and
- Identification of strategic opportunities to assess and remediate brownfields.

The No Build Alternative avoids the generation of the above impacts, but forgoes the potential benefits and economic impacts summarized in the following section.

1.7 Benefits and Economic Impacts

Section 5.0 of the EER includes a discussion of the short-term and long-term benefits of the proposed action in the Northeast Zone. Section 6.0 of the EER identifies the values of short-term uses of the environment in relation to the maintenance and enhancement of long-term values.

Construction of transit and trails in the Northeast Zone can provide linkages between existing and planned development, recreational opportunities, and the transportation network. Environmental gains can derive from the encouragement of transit-oriented mixed-use development and the reduction of vehicle miles traveled per capita and automobile dependence. Context-sensitive design of the proposed action can help preserve and enhance cultural resources within the Northeast Zone. Other potential gains from construction of the proposed project include the removal and control of invasive species and hazardous and solid wastes.

The proposed action can support needs for transportation improvements cited in the City of Atlanta's comprehensive transportation plan, while complementing neighborhood and regional plans to enhance coordinated land use, community circulation, public health, and economic development.

Economic advantages relate to new jobs generated by construction and remediation activities in the short-term, and by the long-term enhancement of mobility, relief of congested urban thoroughfares, and access to jobs, schools, workforce housing, and activity centers in the Northeast Zone study area.

Secondary advantages relate to redevelopment after construction, including new jobs, preservation of light industrial districts, an expanded local tax base, and additional workforce housing.

Economic disadvantages relate to potential business relocation and right-of-way acquisition in Northeast Zone areas outside of the Atlanta Development Authority right-of-way, and the possible loss of taxable land necessary for project development. Continued BeltLine project development and advancement of coordinated transit services, parks, and multi-use trails beyond the Northeast Zone will help to avoid potential economic disparities in the long term.

1.8 Coordination and Comments

MARTA and ABI contacted a number of federal, state, and local/regional agencies and solicited input relating to the proposed action. Additionally, MARTA, in coordination with ABI, will hold a Public Hearing during the public comment period for this EER. Section 7.0 details the coordination activities supporting the preparation of the EER and provides public hearing and contact information.

Page Left Blank

2.0 PROJECT DESCRIPTION AND ALTERNATIVES

2.1 Project Description

2.1.1 BeltLine Corridor

One of the most comprehensive economic development efforts ever undertaken in the City of Atlanta and the largest, most wide-ranging urban redevelopment projects currently underway in the US, the BeltLine will combine greenspace, trails, transit and new commercial, residential and mixed-use development along 22 miles of historic rail corridors that encircle the urban core.

The BeltLine concept includes a proposed new regional transit and pedestrian/bicycle trail system forming an approximately 22-mile loop encircling the Downtown, Midtown, West End/Atlanta University Center, Westside, Grant Park and other Atlanta communities. The BeltLine would tie into other transit services, existing and proposed parks, and green spaces. It would improve local and regional mobility, accessibility, and connectivity, and support the City of Atlanta's redevelopment plans by converting unused and underused railway corridors around Atlanta's central business district to a multi-use transportation corridor.

Over the past 20 years, metropolitan Atlanta's growth has occurred in widely dispersed and disconnected pockets of developments, which have strained the region's quality of life and economic growth. By attracting and organizing some of the region's future growth around parks, transit and trails, the BeltLine will help change the pattern of regional growth in the coming decades and lead to a more vibrant and livable Atlanta with an enhanced quality of life. Figure 2-1 shows the location of the BeltLine Corridor.

2.1.2 Northeast Zone

This EER identifies existing conditions and assesses the potential for BeltLine project impacts in the Northeast Zone portion of the 22-mile BeltLine Corridor. The Northeast Zone of the BeltLine Corridor extends west via DeKalb Avenue NE from the Inman Park/Reynoldstown MARTA Station to the right-of-way presently owned by the Atlanta Development Authority (ADA), then north via ADA right-of-way to the Armour Drive industrial district and the Lindbergh Center MARTA Station at Lindbergh Drive NE. The alignment generally follows an existing railroad corridor between DeKalb Avenue NE and I-85. A new rail alignment and multi-use trails will connect the railroad corridor with the Inman Park/Reynoldstown and Lindbergh Center MARTA Stations.

The general study area for the EER is a one-half mile wide band centered on the BeltLine Corridor. Figure 2-2 shows the Northeast Zone study area. This document specifies the appropriate extents for resource assessments, which may vary within the half-mile study area band depending on the subject resource.

2.2 Participating State Agencies

There are two entities participating as state agencies for purposes of GEPA-triggering actions in the BeltLine Corridor Northeast Zone.

Figure 2-1: BeltLine Corridor

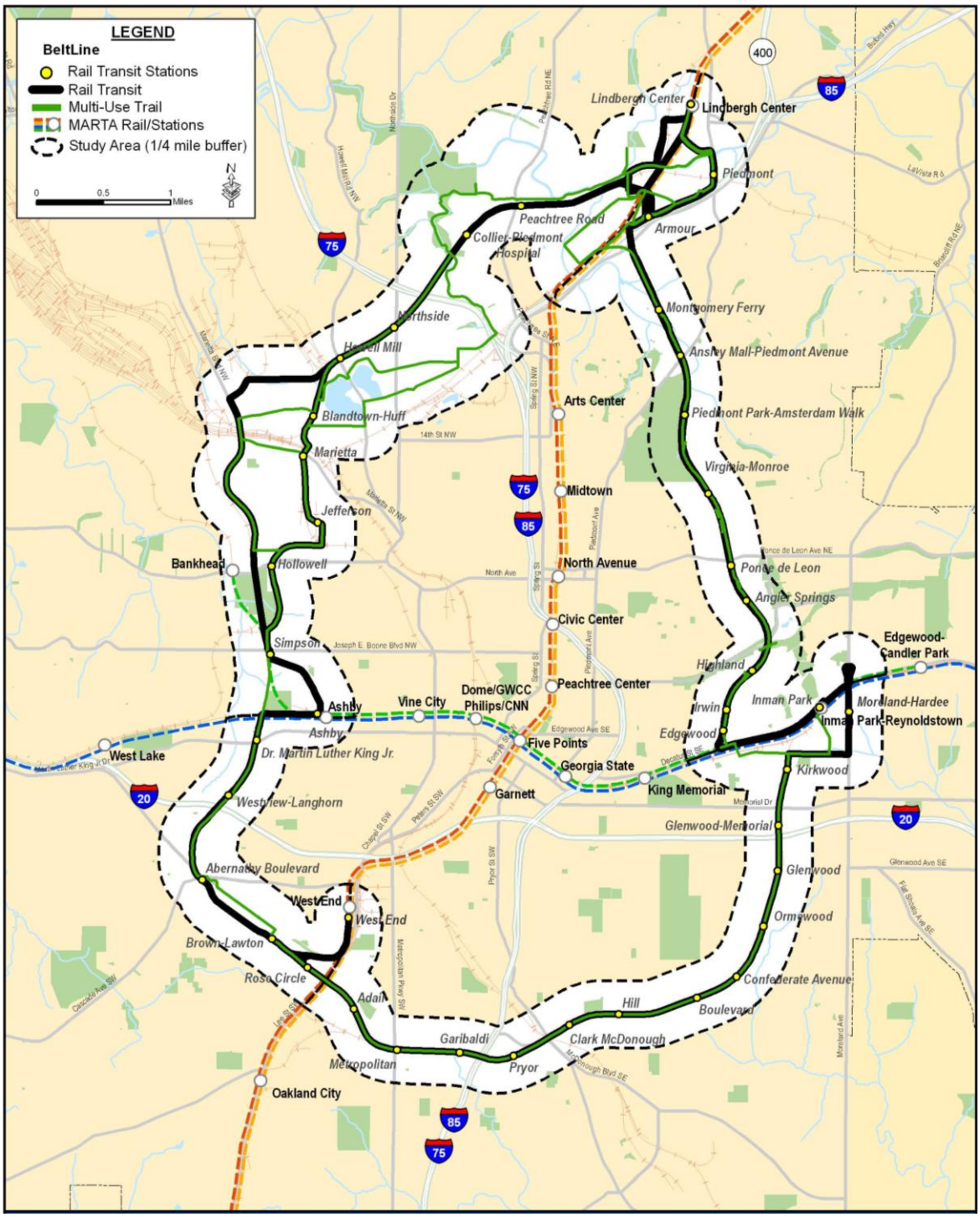
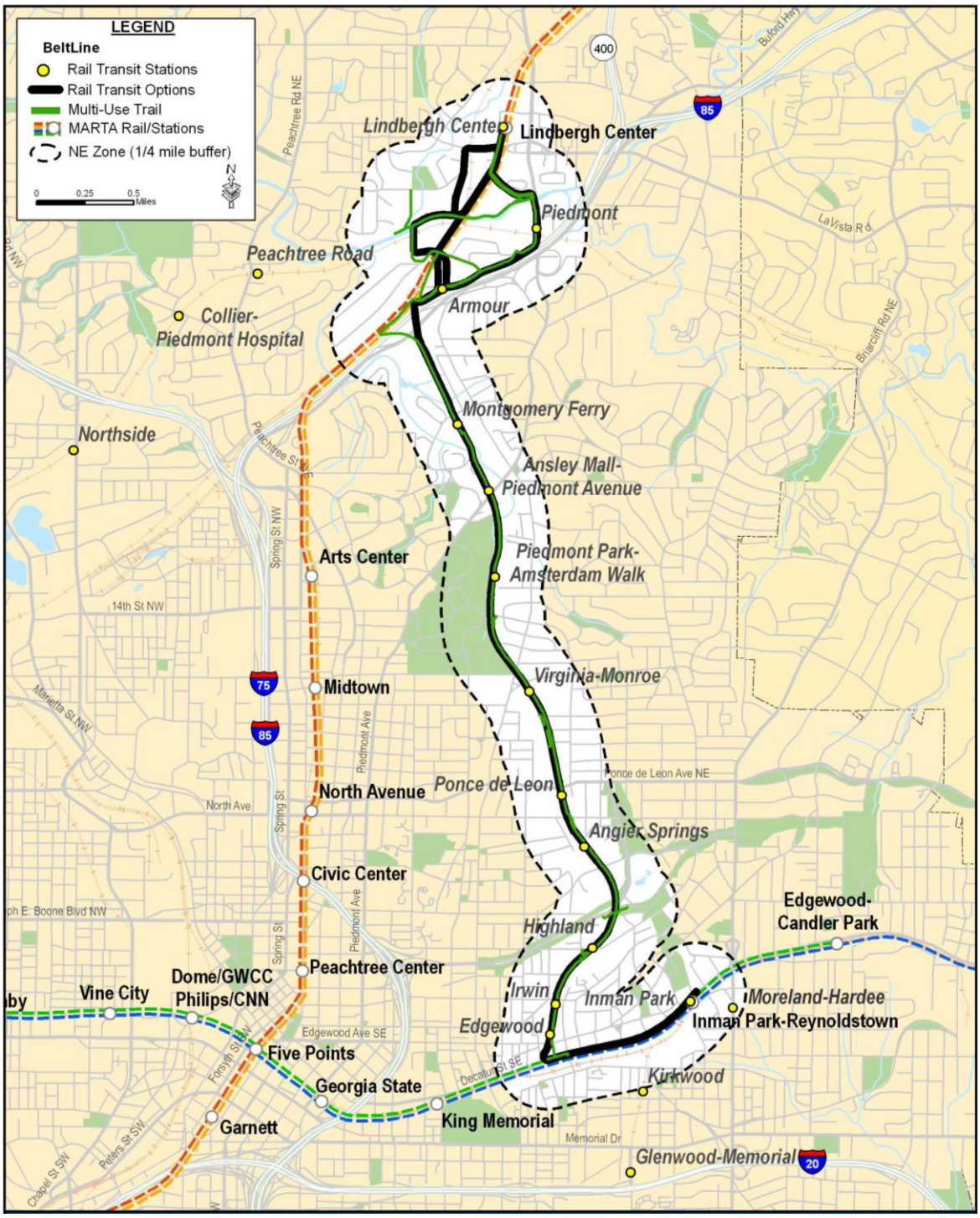


Figure 2-2: Northeast Zone Study Area



The Georgia General Assembly established MARTA under the Metropolitan Atlanta Rapid Transit Authority Act of 1965. MARTA right-of-way in this study area includes the heavy rail and bus stations in the Inman Park/Reynoldstown and Lindbergh Center areas, as well as a heavy rail maintenance facility north of Armour Drive NE.

ADA, a public body corporate of the State of Georgia, registered annually under the state's Local Government Authorities Act (O.C.G.A 36-80-16), is the Redevelopment Agent for the BeltLine Tax Allocation District; it created Atlanta BeltLine, Inc. to implement the BeltLine Project. Northeast Zone right- of-way owned by the Atlanta Development Authority extends along the former Norfolk Southern railway from DeKalb Avenue NE to an area approximately 0.4 mile north of Montgomery Ferry Road NE. In October 2007, ABI through a joint venture purchased the property from Norfolk Southern. In October 2008, the ABI joint venture transferred property ownership to ADA, which is holding title for BeltLine purposes.

This EER presumes the Atlanta Development Authority and MARTA would conduct and coordinate the proposed Northeast Zone actions described in Section 1.4. Non-federal funding from each agency will exceed either $250,000 or 50 percent of project costs. The *Envision6* RTP by the ARC currently programs $5.1 million in non-Federal funds supporting right-of-way acquisition and construction for the entire BeltLine Corridor's multi-use trails and streetscape improvements through Fiscal Year 2011. In accordance with GEPA guidelines, MARTA serves as the lead agency for EER preparation, in partnership with the Atlanta Development Authority (via ABI, its implementation agent). The MARTA/ABI project work plan for the BeltLine Corridor Environmental Study defines the coordination procedures for the respective roles of MARTA and the Atlanta Development Authority (via ABI) in preparing this document.

2.3 Proposed State Action

The Proposed State Action would involve the disturbance of land within the BeltLine Corridor Northeast Zone for the construction of a fixed rail transit guideway and multi-use trails. Land disturbance is likely to include clearing, grading, or excavating of land owned by either MARTA or the Atlanta Development Authority. Possible effects of these land-disturbing activities may include, but are not limited to the following:

- alteration or movement of certain structures (for example, bridges or railbeds) on or eligible for the Georgia or National Register of Historic Places;
- alteration of waters of the US and waters of the State, or the placement of structures in the vicinity of such waters;
- significant alteration in areas of recognized scenic, recreational, archaeological or historical value;
- significant alteration of floodplains (for example, establishing impervious surfaces that increase the amount of flow in or near populated areas); and
- adversely affecting water quality in streams or water supply impoundments through runoff of sediment or other contaminants.

2.3.1 Alternatives

The EER includes an examination of Build and No Build Alternatives.

The Build Alternative includes a combination of a new Light Rail/Modern Streetcar transit line and new multi-use trails. The rail transit guideway would include electrically powered vehicles, overhead wires to deliver the power to the vehicles, stations with platforms to accommodate waiting passengers, and access from the stations to adjacent streets, sidewalks, and pedestrian facilities. The alignment in the Northeast Zone would be approximately 6.5 miles long, with at least 12 new stations and stops at the Inman Park/Reynoldstown and Lindbergh Center MARTA Stations. The line would connect area neighborhoods and the two existing MARTA heavy rail stations. The Build Alternative is the Proposed State Action.

Under the No Build Alternative scenario, MARTA and ABI would take no action to construct the project. The No Build Alternative includes the existing transportation system throughout the corridor study area and the Atlanta region. The No Build Alternative also includes all of the proposed projects currently in the Atlanta Regional Commission (ARC) TIP (FY 2008-2013) and within the cost-constrained *Envision6* RTP (FY 2008-2030), excepting the BeltLine transit and trails.

2.3.2 Transit Technology Options

There are two transit technology options in the Proposed State Action:

- Light Rail Transit (LRT); and
- Modern Streetcar

Construction of the rail transit alignment and stations could accommodate either LRT or Modern Streetcar vehicles. LRT is a passenger rail system operating along either a grade separated fixed rail right-of-way or in a street right-of-way adjacent to or shared with traffic. LRT systems are generally single-car or multiple-car trains with station-level or street-level boarding capabilities. Modern Streetcars are a form of rail that typically includes smaller vehicles and usually operate as single car trains. Modern Streetcars are similarly capable of operating in mixed traffic and along a fixed rail guideway.

This EER assesses worst-case impacts associated with the transit technology options (typically, LRT impacts), and identifies opportunities to avoid significant environmental effects when considering transit and multi-use trails alignment options north of I-85, as described in the following subsections.

2.3.3 Transit and Multi-Use Trail Alignments

North of I-85, there are three transit and multi-use trail alignment options connecting to the Lindbergh Center MARTA Station in the Proposed State Action. Each transit option extends north of the Atlanta Development Authority right-of-way and beneath I-85 to a point south of Mayson Street NE and west of Plasters Avenue NE. Each option also concludes at the Lindbergh Center MARTA Station north of Lindbergh Drive NE via Garson Drive NE. Each option includes a rail connection to an approximate 11-acre maintenance facility for the BeltLine, bounded to the south by Armour Drive NE, to the

north and west by the existing MARTA Armour Yard, and to the east by Plasters Avenue NE.

Each multi-use trail option design corresponds with the transit option of similar number. Each trail option extends north of the Atlanta Development Authority right-of-way and beneath I-85 to a point along Mayson Street NE parallel to Norfolk Southern railroad, continuing north, then east along Mayson Street NE to a point east of and beneath the MARTA heavy rail bridge. Each option also includes a multi-use trail along the northern edge of Peachtree Creek, with connections to Peachtree Hills Avenue NE via the western boundary of the Garden Brook at Peachtree Hills condominiums property. Each trail option connects to the Lindbergh Center MARTA Station via Piedmont Road NE and Garson Drive NE.

Figure 2-3, Figure 2-4, and Figure 2-5 illustrate transit and multi-use trail Options 1, 2 and 3, respectively. Descriptions of each option follow.

2.3.4 Alignment Option 1

- **Transit Option 1** (Figure 2-3) accesses the Lindbergh Center MARTA Station via an area west of the Norfolk Southern railroad. This alignment option:
  - extends the transit alignment east to Armour Place NE;
  - continues to the north along Armour Place NE to Armour Drive NE, with the northern part of this segment in a retained cut to bring the alignment down to the grade of Armour Drive NE;
  - continues along Armour Drive NE to the west, beneath the MARTA heavy rail and Norfolk Southern freight railroad bridges, to the southern and western boundaries of the Lafarge Building Materials, Inc. and Ready Mix USA, LLC properties;
  - elevates above CSX railroad and Peachtree Creek to the north and continues east along the north bank of Peachtree Creek;
  - continues along the southern and eastern boundaries of the Atlanta Decorative Arts Center (ADAC) property to Peachtree Hills Avenue NE;
  - continues to the north at surface level in mixed traffic along or in Peachtree Hills Avenue NE to Lindbergh Drive NE;
  - operates at surface level in mixed traffic along or in Lindbergh Drive NE, beneath the Norfolk Southern railroad bridge and Garson Drive NE to the Lindbergh Center MARTA Station;
  - includes an at-grade Armour Station for BeltLine transit to the southwest of the intersection of Armour Place NE and Plasters Avenue NE, immediately north of I-85; and
  - includes consideration for one sub-option, "**Option 1A**," which extends east of the ADAC southern boundary and continues under the Norfolk Southern railroad, then continues north to the east of the Post Lindbergh Apartments property and parallel to the MARTA heavy rail line to Garson Drive NE.
- **Multi-Use Trail Option 1** (Figure 2-3):

- extends east at-grade along Mayson Street NE and Plasters Avenue NE, near the proposed BeltLine transit station, to Armour Drive NE;
- continues west along Armour Drive NE, beneath the MARTA heavy rail and Norfolk Southern railroad bridges, and to the southern and western boundaries of the Lafarge Building Materials, Inc. and Ready Mix USA, LLC properties;
- continues north, elevating above CSX railroad and Peachtree Creek;
- continues east along the north bank of Peachtree Creek to Piedmont Road NE; and
- continues along Garson Drive NE to the Lindbergh Center MARTA Station.

2.3.5 Alignment Option 2

- **Transit Option 2** (Figure 2-4) accesses the Lindbergh Center MARTA Station via Piedmont Road NE, east of the Norfolk Southern railroad. This alignment option:
  - extends the transit alignment east along Plasters Avenue NE;
  - elevates along the eastern boundary of the MARTA Armour Yard;
  - continues north parallel to Piedmont Road NE, along the eastern boundary of the Rollins, Inc. property, elevating above CSX railroad and Peachtree Creek to Garson Drive NE;
  - continues west, then north, along Garson Drive NE to the Lindbergh Center MARTA Station; and
  - includes an at-grade Armour Station for BeltLine transit to the southwest of the intersection of Armour Place NE and Plasters Avenue NE, immediately north of I-85.

- **Multi-Use Trail Option 2** (Figure 2-4):
  - extends east at-grade along Mayson Street NE adjacent to the proposed BeltLine transit station;
  - continues east along Plasters Avenue NE, parallel to the BeltLine transit alignment;
  - elevates along the eastern boundary of the MARTA Armour Yard;
  - continues north parallel to Piedmont Road NE and the BeltLine transit alignment, along the eastern boundary of the Rollins, Inc. property, elevating above CSX railroad and Peachtree Creek to Garson Drive NE; and
  - continues west and north along Garson Drive NE to the Lindbergh Center MARTA Station.

2.3.6 Alignment Option 3

- **Transit Option 3** (Figure 2-5) provides access that is more direct to the Lindbergh Center MARTA Station, using more elevated guideway and less in-street right-of-way. This alignment option:
  - extends the transit alignment north along Mayson Street NE;

- elevates above MARTA heavy rail to an alignment between the existing MARTA and existing Norfolk Southern line; continues north, elevating above the CSX railroad and Peachtree Creek;
- continues north to the east of Norfolk Southern railroad and the Post Lindbergh apartments property and parallel to and west of MARTA heavy rail to Garson Drive NE; and
- includes an at-grade Armour Station for BeltLine transit to the southwest of the intersection of Armour Place NE and Plasters Avenue NE, immediately north of I-85.

- **Multi-Use Trail Option 3** (Figure 2-5):
  - extends north, elevating east of and parallel to the MARTA heavy rail line,
  - continues north, beneath the proposed elevated BeltLine transit alignment to Armour Drive NE;
  - continues west along Armour Drive NE beneath the elevated BeltLine transit alignment and beneath the MARTA heavy rail and Norfolk Southern railroad bridges;
  - continues along the southern and western boundaries of the Lafarge Building Materials, Inc. and Ready Mix USA, LLC properties;
  - continues north, elevating above CSX railroad and Peachtree Creek; and
  - continues east along the north bank of Peachtree Creek to Piedmont Road NE, then to Garson Drive NE, and on to Lindbergh Center.

2.3.7 Limits of Disturbance

The general study area for the EER is a one-half mile wide band centered on the BeltLine Corridor. Where appropriate, the EER specifies required assessment extents within the half-mile band, as such extents may vary depending on the subject resource.

Physical effects from the BeltLine project may occur within the Limit of Disturbance (LOD). In this EER, the LOD represents the likely “footprint” of the project, or the physical extent of the proposed transit track centerlines, passenger stations, and trail configuration with trail access points.

Establishing the LOD line first involved updating a base profile of the existing terrain, matching the existing conditions as closely as possible while achieving appropriate trail and transit grades. Next steps involved updating existing cross sections, taken every 100 feet along the alignment, based upon the typical sections prepared for the project. LOD lines represent intersections of the section lines for the proposed improvements and the existing grade. Final LOD boundary adjustments reflected design assumptions for construction, including properly graded earthwork, the introduction of constraints near environmentally sensitive areas, and the introduction of retaining walls where LOD lines would otherwise extend beyond the Atlanta Development Authority right-of-way. Where proposed transit services would operate within an existing street, the street’s curb lines represent the LOD.

Figure 2-3: Transit/Trails Option 1 and Transit Option 1A

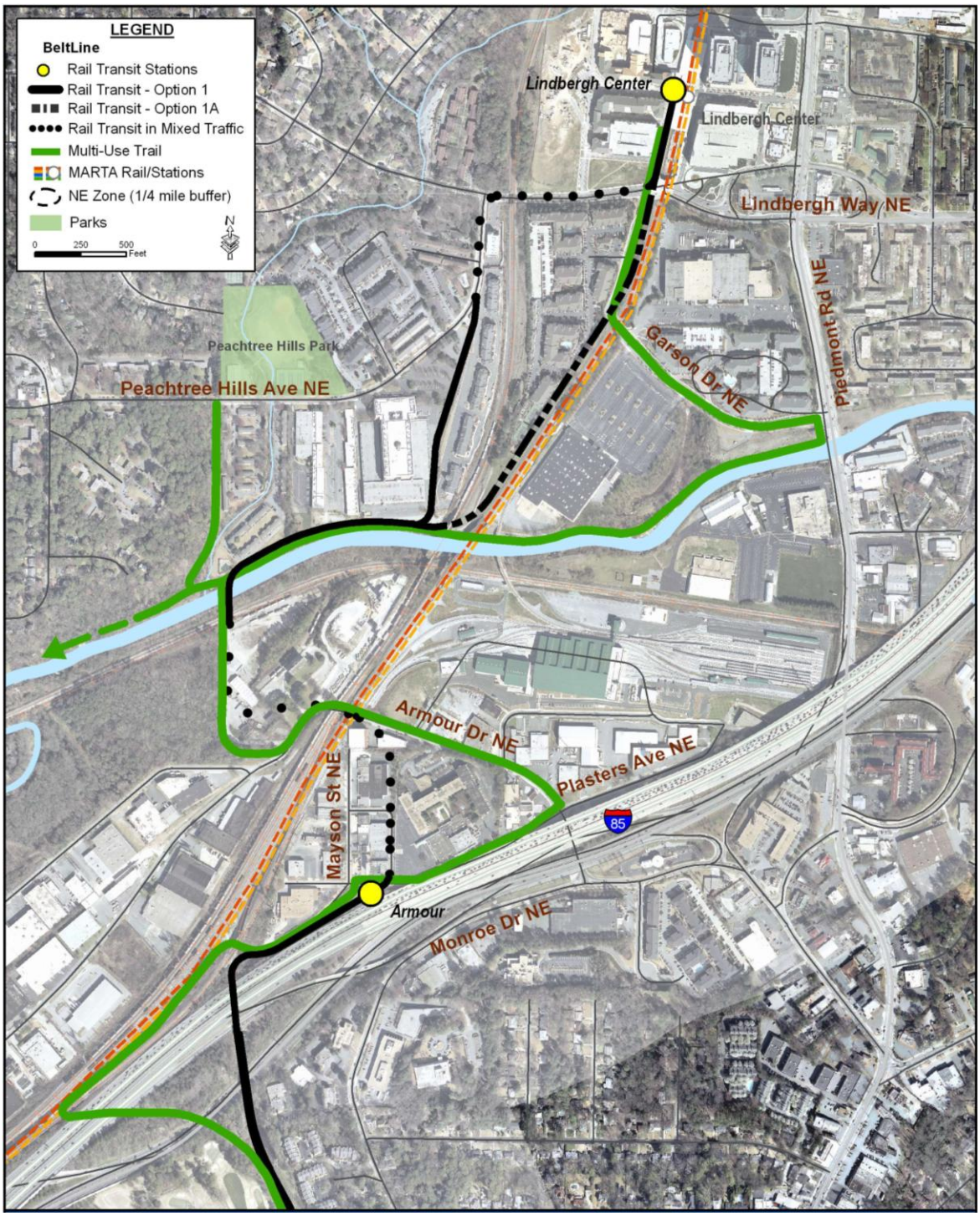


Figure 2-4: Transit/Trails Option 2

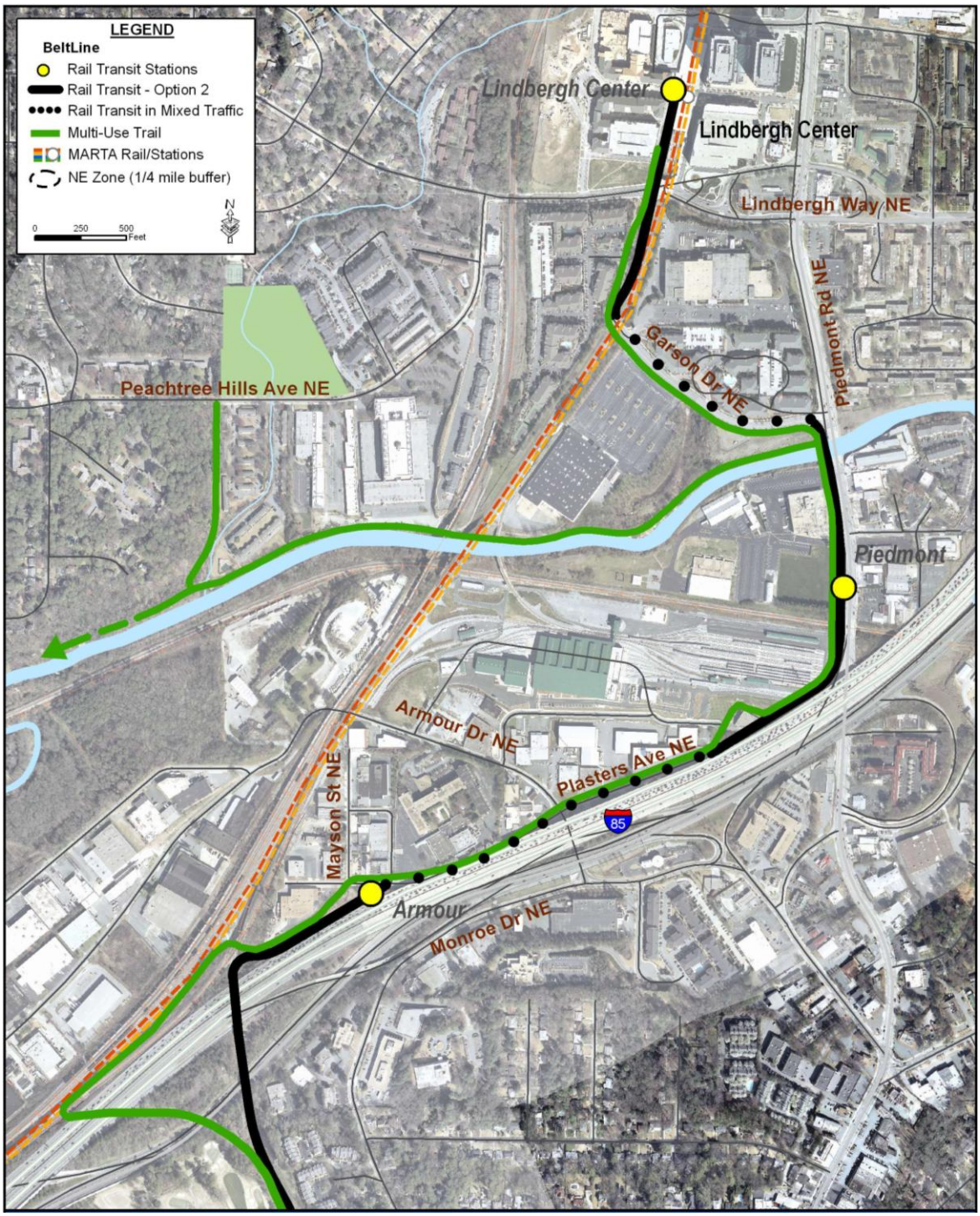
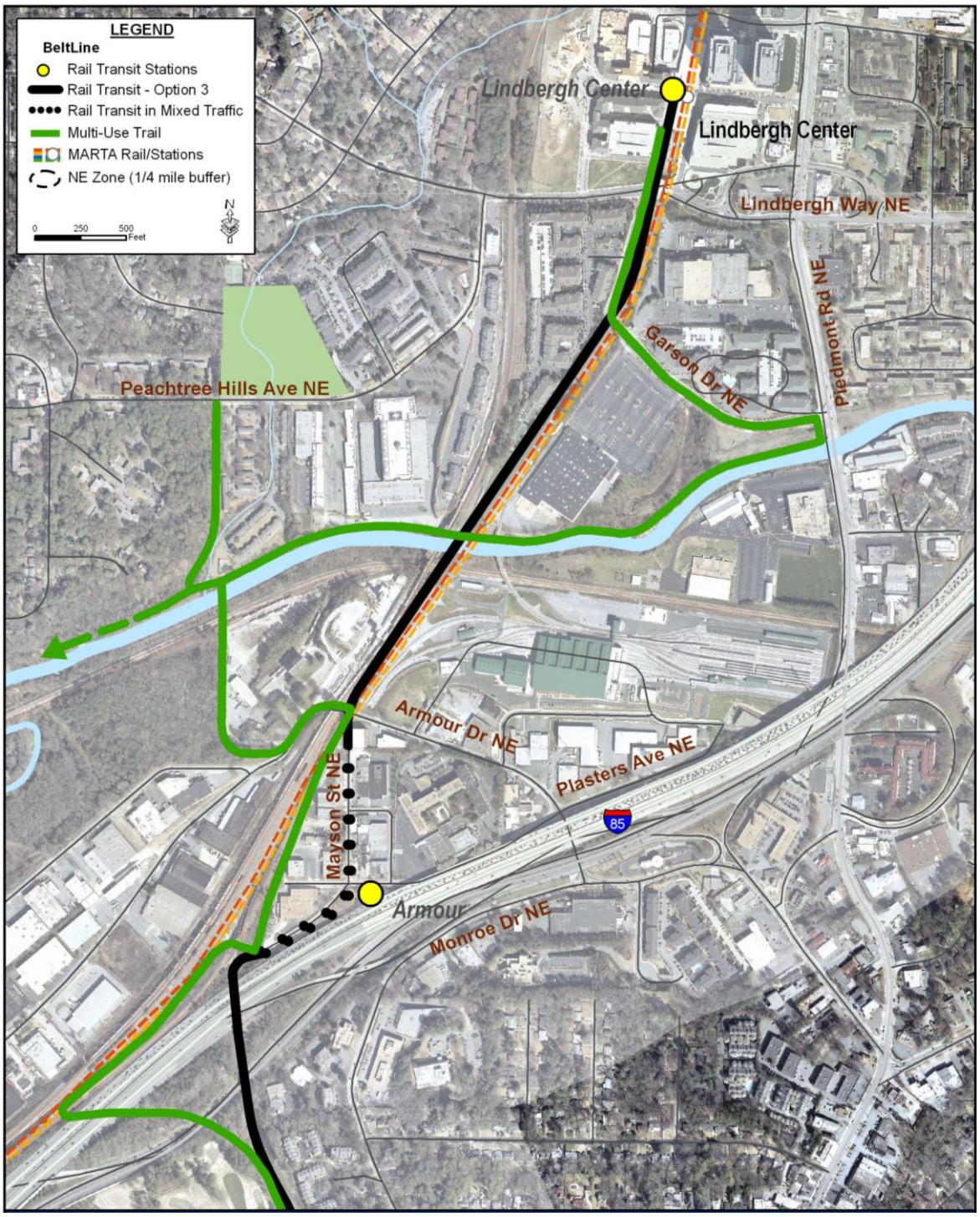


Figure 2-5: Transit/Trails Option 3



Page Left Blank

3.0 ENVIRONMENTAL SETTING

3.1 Environmental Setting without the Project

The BeltLine Corridor Northeast Zone is an approximate 6.5-mile corridor within the City limits of Atlanta, Fulton County, Georgia. The proposed action occurs in a highly developed urban area within the Piedmont Physiographic Province of Georgia. The following land use/land cover types are along the project corridor:

- abandoned railroad ROW;
- maintained transportation and utility ROW;
- mixed pine/hardwood forestland;
- commercial property;
- industrial property;
- hardwood forestland;
- residential property; and
- surface waters.

The proposed BeltLine alignment within the Northeast Zone connects several communities and passes through a combination of established residential communities, new lower income housing developments, light industrial areas, and derelict industrial areas targeted for redevelopment. The EER study area identified in Figure 2-2 encompasses a railway corridor approximately 2 to 4 miles east of the center of downtown Atlanta.

The approximate latitude and longitude for the center-point of the proposed project corridor is +33.78194° (33° 46’ 55” N) and -84.368611° (84° 22’ 07” W). The approximate latitude and longitude for the north end of the proposed project corridor is +33.82305° (33° 49’ 23” N) and -84.369722° (84° 22’ 11” W). The approximate latitude and longitude for the south end of the proposed project corridor is +33.7575° (33° 45’ 27” N) and -84.352777° (84° 21’ 10” W). The project is in the Upper Chattahoochee River basin (Hydrologic Unit Code 03130001), a priority watershed listed by the United States Environmental Protection Agency (USEPA).

The development phase of the project concept included the gathering and studying of basic data on the proposed project corridor. Data for this project included, at a minimum, U.S. Geological Survey (USGS) topographic maps, aerial photography, previous studies, National Wetlands Inventory (NWI) maps, soil survey maps, floodplain maps, and Georgia Department of Natural Resources (DNR) historic resource survey maps.

Using these data and information gathered on field surveys of the project corridor, any existing wetland areas, floodplains, parks and recreational facilities, known or suspected historical and archaeological sites, rights-of-way, possible underground storage tank (UST)/landfill/hazardous waste sites, and areas of possible endangered species habitat were identified. Also noted were other constraints such as homes, churches, cemeteries, schools, hospitals, and other sensitive sites.

The data collection and field survey for wetlands and waters of the U.S. and State resulted in the observation of eight jurisdictional perennial streams, three jurisdictional intermittent streams, two jurisdictional wetlands, and one non-jurisdictional ephemeral stream in the study area. The field survey included an observation of migratory bird nests beneath two bridges in the study area.

In addition, floodplains associated with Peachtree Creek and Clear Creek exist within the study area.

The Northeast Zone of the BeltLine contains a number of long standing and often historic neighborhoods, including Peachtree Hills, Piedmont Heights, Brookwood Hills, Ansley Park, Virginia Highland, Morningside, Midtown, Poncey Highland, Old Fourth Ward, and Inman Park.

A review of the historical architectural resources within the EER study area resulted in the identification of 39 properties listed in, previously determined eligible for listing in, or recommended eligible for listing in the National Register of Historic Places. These properties consist of:

- ten (10) historic districts listed in the National Register of Historic Places;
- two (2) multiple-property evaluations (including bridge structures);
- eleven (11) historic districts recommended eligible for inclusion in the National Register of Historic Places (NRHP); and
- sixteen (16) individual properties recommended eligible for inclusion in the NRHP.

Eight archaeological sites are also within a one-kilometer (0.62-mile) radius of the corridor.

Fourteen parks/recreational areas are within the study area, including ten existing public parks/recreation areas, two planned public parks, and two privately owned recreation areas.

There are 214 hazardous materials sites within the study area. There were no solid waste landfills in the study area.

Section 4.0 of this EER (Environmental Consequences) discusses effects to the above resources.

There are no known energy reserves, such as crude oil or natural gas in the project corridor. The field survey revealed no federal- or state-protected flora, fauna, or appropriate habitats. No protected mountains, critical habitats, beaches, dunes, shorelines, estuaries, forested areas (as defined under GEPA), barrier islands, trout streams, or farmlands exist within the EER study area.

4.0 ENVIRONMENTAL CONSEQUENCES

4.1 Wetlands/Waters of the U.S. and State

Jurisdictional waters of the U.S. are defined by 33 CFR Part 328.3 (b) and are protected by Section 404 of the Clean Water Act (33 USC 1344), which is administered and enforced by the U.S. Army Corps of Engineers (USACE). This EER assessment used USGS topography maps, NWI maps, and county soil survey maps to identify jurisdictional waters of the U.S. that the proposed action would affect. Subsequent field investigations allowed for refinements to the assessments of jurisdictional waters. Wetland locations were determined using the 1987 USACE Wetlands Delineation Manual. The USACE manual's multi-parameter approach requires positive evidence of three criteria:

- hydrophytic vegetation;
- hydric soils; and
- wetland hydrology.

Jurisdictional wetlands exhibit evidence of all three of the above wetland parameters. Jurisdictional intermittent or perennial streams exhibit a definite channel and wrested vegetation, and show evidence of water flow at times other than major storm events. Ephemeral streams exhibit wrested vegetation and evidence of flow only during and immediately after storm events. In addition, ephemeral streams do not have hydric soils or base flow as in intermittent and perennial streams. Ephemeral streams are non-jurisdictional if they do not provide a significant nexus between two separate Waters of the U.S.

Within the study area are eight perennial streams, three intermittent streams, two wetlands and one ephemeral stream. Figure 4-1, Figure 4-2, and Figure 4-3 identify the locations of wetlands, Waters of the U.S. and Waters of the State along the Northeast Zone study area. These resources are between the Lindbergh Center MARTA Station to the north and Piedmont Park to the south.

4.1.1 Assessment of Effects

Table 4-1 lists wetlands/Waters of the U.S. and State potentially affected by the proposed Build Alternative. The proposed action avoids direct impacts to several of the water resources. However, most of the water resources also have a 25-foot vegetative buffer. Table 4-1 also summarizes the impacts to each of the water resources and associated buffers. The following sections detail each of the water resources in the study area.

Table 4-1: Impacts to Wetlands/Waters of the U.S. and State

Study Area Water Resource	Actions in Impacted Area	Area of Impact (fill)[1]	25-foot Buffer Impact
Stream 1	None – beyond LOD	0.0	No
Stream 2	Culvert – new	43 linear feet	Yes
Stream 3	None – bridged	0.0	Yes
Stream 4	None – bridged	0.0	Yes
Wetland 5	None – beyond LOD	0.0	n/a
Stream 6 (Ephemeral)	None – beyond LOD	0.0	n/a
Stream 7	Culvert – extension	80 linear feet	No
Stream 8	Culvert – extension	72 linear feet	No
Stream 9	Culvert – new	94 linear feet	No
Stream 10	None – beyond LOD	0.0	Yes
Stream 11	Culvert – new	60 linear feet	No
Stream 12	Culvert – new	65 linear feet	No
Stream 13	None – beyond LOD	0.0	Yes
Wetland 14	None – beyond LOD	0.0	n/a

[1] Permanent fill of stream channels due to new/extended culverts or other construction activities.

Stream 1

Stream 1, an unnamed tributary of Peachtree Creek, is a somewhat impaired perennial stream with a substrate of silt, sand, pebble, cobble, and boulder. By Georgia DNR definition, a stream is somewhat impaired if it does not satisfy DNR criteria as a fully functional stream, and if the stability and resilience of the stream have been compromised to a limited degree. Somewhat impaired streams systems have a moderate probability of recovering naturally. The stream location is north and south of Peachtree Hills Avenue NE, approximately 0.3 miles southwest of the Lindbergh Drive NE/Peachtree Hills Avenue NE intersection. The stream flows along the west side of Peachtree Hills Park. Near Peachtree Hills Park, the placement of a rock wall armors the east bank of this stream. At the time of the survey, there was normal flow in the channel. The depth of the water in the channel ranged from 4 inches to 1 foot. An assessment of water clarity showed moderate turbidity (cloudiness). The direction of flow crosses the project corridor from north to south, passing beneath Peachtree Hills Avenue NE in a 10-foot wide arched culvert. Channel width varies from 15 to 20 feet, and the channel

Figure 4-1: Wetlands/Waters of the U.S. and State (Armour/Lindbergh Area)

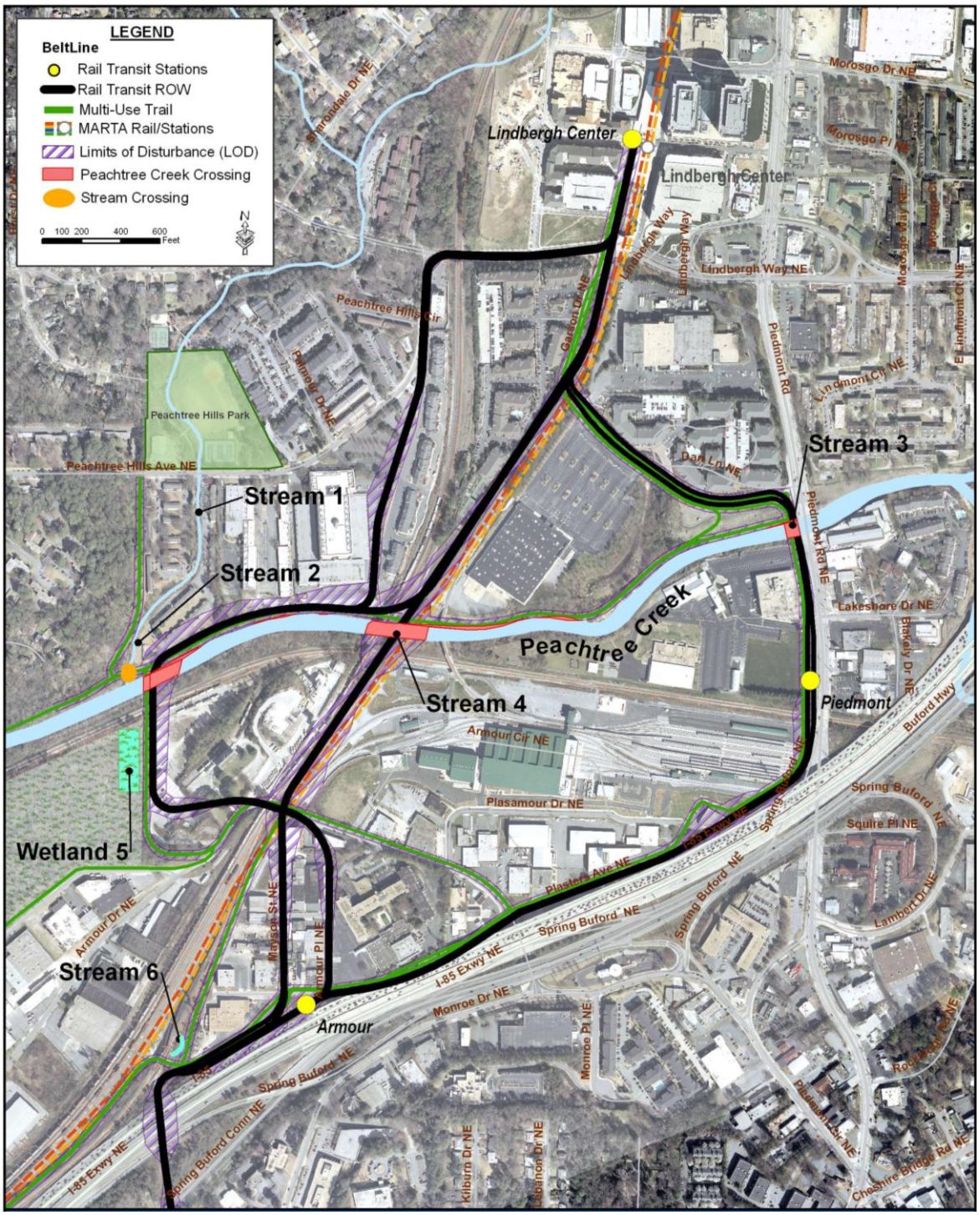


Figure 4-2: Wetlands/Waters of the U.S. and State (Montgomery Ferry/Ansley Area)

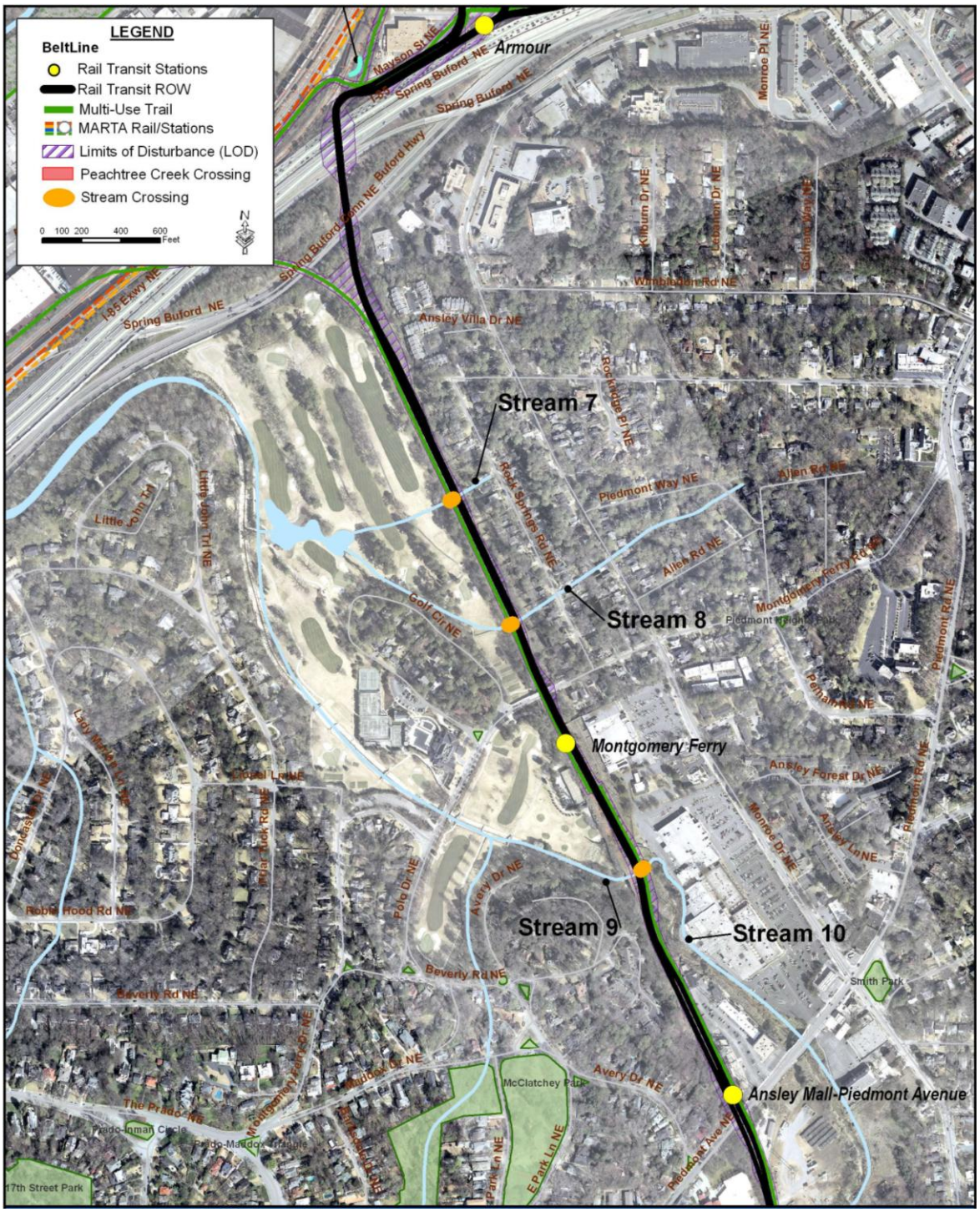


Figure 4-3: Wetlands/Waters of the U.S. and State (Piedmont Park Area)

depth ranges from 1 to 2 feet.

Bankfull conditions represent the stage where additional volume in the channel can result in stream overflow into nearby floodplains. The bankfull width of the stream varies from 10 to 15 feet, and the bankfull depth of the resource ranges from 6 inches to 1.5 feet. The stream has a low-quality riparian buffer (the area of transition between aquatic and upland ecosystems) that extends zero to 15 feet from the left downstream bank and 10 to 25 feet from the right downstream bank. Urban development has affected the stream buffer. Residential apartment complexes and Peachtree Hills Park are beyond the stream's riparian buffer. The channel exhibits moderate erosion and siltation. The channel displays low sinuosity, or meandering movement, and the stream banks are moderately stable. Stream 1 receives surface water runoff from the maintained transportation ROW, residential apartment buildings, a city park, and hardwood forestland.

Stream 1 is not on the 2008 Georgia 303(d) stream listing, but is a tributary of a listed stream (Peachtree Creek). Peachtree Creek does not support its designated use of fishing. The criterion violated is fecal coliform bacteria levels. The potential causes for the violation are urban runoff/urban effects and combined sewer overflow. Stream 1 does not provide any potential habitat for protected species. There were no migratory birds or migratory bird nests within the existing Peachtree Hills Avenue NE culvert.

The proposed action would not impact Stream 1. The stream is beyond the proposed project's LOD.

In certain circumstances, when stream buffer protection is not practical, the Georgia Environmental Protection Division (EPD) may grant a variance permitting construction to intrude into the stream buffer and documenting provisional erosion control measures and mitigation practices to minimize buffer impacts. Stream 1 would not require a Stream Buffer Variance.

Stream 2

Stream 2, an unnamed tributary of Peachtree Creek, is a somewhat impaired perennial stream with a substrate of silt, sand, pebble, cobble, and boulder. Stream 2 is the same resource (Peachtree Creek) as Stream 1. The portion of Peachtree Creek that comprises Stream 2 is downstream of Stream 1. The stream location is approximately 950 feet south of Peachtree Hills Avenue NE and approximately 0.68 mile west of Piedmont Road NE.

At the time of the survey, there was normal flow in the channel. The depth of the water in the channel ranged from 6 inches to 1.5 feet. An assessment of water clarity showed moderate turbidity. The direction of flow crosses the project corridor from north to south, passing through a narrow corridor of hardwood forestland before joining Peachtree Creek. The channel width varies from 15 to 20 feet, and depth ranges from 3 to 4 feet. The bankfull width of the stream varies from 10 to 15 feet, and the bankfull depth of the resource ranges from 2 to 3 feet.

The stream has a medium-quality riparian buffer that extends 10 to 15 feet from the left downstream bank and greater than 50 feet from the right downstream bank. Urban development has affected the stream buffer. An apartment complex is beyond the

stream's riparian buffer. The stream has an ordinary high water mark, and the soils of the streambed are hydric. The channel exhibits moderate erosion and siltation. The channel displays moderate sinuosity, and the stream banks are moderately stable. Stream 2 receives surface water runoff from residential apartment buildings and hardwood forestland.

This stream is not on the 2008 Georgia 303(d) stream listing, but is a tributary of a listed stream (Peachtree Creek). Peachtree Creek does not support its designated use of fishing. The criterion violated is fecal coliform bacteria levels. The potential causes for the violation are urban runoff/urban effects and combined sewer overflow. Stream 2 does not provide any potential habitat for protected species.

The placement of a new box culvert for the multi-use trail portion of the project would impact Stream 2. Construction of the proposed project would result in 43 linear feet (0.02 acre) of permanent impact to Stream 2. As a result of the location of the proposed multi-use trail portion of the project, a Stream Buffer Variance permit from the Georgia Environmental Protection Division (EPD) would be required for work proposed within the 25-foot buffer of Stream 2. The multi-use trail would longitudinally encroach upon the 25-foot vegetative buffer of Stream 2 along the stream's west (right downstream) bank.

Stream 3

Stream 3, Peachtree Creek, is a somewhat impaired perennial stream with a substrate of silt, sand, pebble, cobble, boulder, and bedrock. Peachtree Creek is a tributary of the Chattahoochee River. The stream location is east and west of Piedmont Road NE, approximately 175 feet south of Garson Drive NE.

At the time of the survey, there was normal flow in the channel. The depth of the water in the channel ranged from 1 to 4 feet. An assessment of water clarity showed high turbidity. The direction of flow crosses the project corridor from east to west, passing beneath a Piedmont Road NE bridge. Channel width varies from 35 to 45 feet, and the channel depth ranges from 6 to 8 feet. The bankfull width of the stream varies from 30 to 40 feet, and the bankfull depth of the resource ranges from 5 to 7 feet.

The stream has a low-quality riparian buffer that extends 15 to 30 feet from each bank. Urban development has affected the stream buffer. Commercial property and the transportation ROW are beyond the stream's riparian buffer. The stream has an ordinary high water mark, and the soils of the streambed are hydric. The channel exhibits moderate erosion and siltation. The channel exhibits low sinuosity, and the stream banks are moderately stable. Stream 3 receives surface water runoff from the maintained transportation ROW, commercial property, and hardwood forestland.

Stream 3 is on the 2008 Georgia 303(d) stream listing. Peachtree Creek does not support its designated use of fishing. The criterion violated is fecal coliform bacteria levels. The potential causes for the violation are urban runoff/urban effects and combined sewer overflow. Stream 3 does not provide any potential habitat for protected species. There were several migratory bird nests beneath the existing Piedmont Road NE bridge. However, the proposed action would not impact this bridge.

The proposed action would not impact Stream 3. The project would clear-span Peachtree Creek with the construction of a new bridge. The project would require a Stream Buffer

Variance for proposed work within the 25-foot buffer Stream 3 resulting from the location of the proposed multi-use trail portion. The multi-use trail would longitudinally encroach upon the 25-foot vegetative buffer of Stream 3 along the creek's north (right downstream) bank.

Stream 4

Stream 4, Peachtree Creek, is a somewhat impaired perennial stream with a substrate of silt, sand, pebble, cobble, boulder, and bedrock. Stream 4 is the same resource (Peachtree Creek) as Stream 3. The portion of Peachtree Creek that comprises Stream 4 is downstream of Stream 3. Peachtree Creek is a tributary of the Chattahoochee River. The stream location is approximately 780 feet south of Peachtree Hills Avenue NE and 0.43 mile west of Piedmont Road NE.

At the time of the survey, there was normal flow in the channel. The depth of the water in the channel ranged from 1 to 4 feet. An assessment of water clarity showed high turbidity. The direction of flow crosses the project corridor from east to west, passing beneath an active MARTA rail transit bridge and through a narrow corridor of invasive plant species and hardwood trees. Channel width varies from 35 to 45 feet, and the channel depth ranges from 6 to 8 feet. The bankfull width of the stream varies from 30 to 40 feet, and the bankfull depth of the resource ranges from 5 to 7 feet.

The stream has a low-quality riparian buffer that extends 15 to 35 feet from each bank. Urban development has affected the stream buffer. Commercial buildings, railroad beds, apartment complexes, and an industrial area are beyond the stream's riparian buffer. The stream has an ordinary high water mark, and the soils of the streambed are hydric. The channel exhibits moderate erosion and siltation. The channel exhibits moderate sinuosity, and the stream banks are moderately stable. Stream 4 receives surface water runoff from the maintained transportation ROW, hardwood forestland, commercial property, and residential property.

Stream 4 is on the 2008 Georgia 303(d) stream listing. Peachtree Creek does not support its designated use of fishing. The criterion violated is fecal coliform bacteria levels. The potential causes for the violation are urban runoff/urban effects and combined sewer overflow. Stream 4 does not provide any potential habitat for protected species. There were no migratory birds or migratory bird nests beneath the active MARTA rail transit bridge.

The proposed action would not impact Stream 4. The proposed project would clear-span Peachtree Creek with the construction of a new bridge. As a result of the location of the proposed multi-use trail portion of the project, the project would require a Stream Buffer Variance for Stream 4. The multi-use trail would longitudinally encroach upon the 25-foot vegetative buffer of Stream 4 along the creek's north (right downstream) bank.

Wetland 5

Wetland 5 is an intermittently flooded, palustrine, forested wetland north of Armour Drive and approximately 0.67 mile west of Piedmont Road NE. This wetland location is near Peachtree Creek (Stream 4). The wetland is in fragmented habitat and receives runoff from industrial property. Wetland 5 also supports the growth of invasive plant species. This USACE system classification is medium quality resulting from its relative maturity

and ability to retain floodwater, provide limited wildlife habitat, and filter pollutants from the environment. Wetland 5 does not provide any potential habitat for protected species. Construction of the proposed project would not impact Wetland 5. The wetland is beyond the proposed project's LOD.

Stream 6 (Ephemeral)

Stream 6 (Ephemeral) is an unnamed, low-quality stream with a substrate of silt, sand, clay, cobble and vegetative debris. The stream location is north of Mayson Street NE, approximately 500 feet southwest of Plasters Avenue.

At the time of the survey, there was no flow in the channel. Additionally, there was no pooling of water within the channel. The direction of flow would cross the project corridor from northeast to southwest, beginning in a mixed pine/hardwood forest adjacent to a railroad bed. The channel width varies from 1 to 3 feet, and the channel depth ranges from 6 inches to 1 foot.

The stream has a low-quality riparian buffer that extends 10 to 25 feet from each bank. Urban development has affected the stream buffer. The transportation ROW, a railroad bed, and commercial businesses are beyond the stream's riparian buffer. The stream does not have an ordinary high water mark, and the soils of the streambed are non-hydric. The channel exhibits slight erosion and siltation. The channel exhibits low sinuosity, and the stream banks are stable. Stream 6 receives surface water runoff from the maintained transportation ROW, industrial property, and mixed pine/hardwood forestland.

This stream is not on the 2008 Georgia 303(d) stream listing, and it is not a tributary of a listed stream. Stream 6 does not provide potential habitat for protected species.

The proposed action would not impact Stream 6. The ephemeral stream is beyond the project's proposed LOD. Stream 6 does not join two separate Waters of the U.S., and therefore provides no significant nexus for jurisdictional waters. The ephemeral stream carries storm water runoff from surrounding uplands to a culvert that empties into the city sewer system. Stream 6 is not among the jurisdictional Waters of the U.S., but it is among the Waters of the State. This ephemeral stream does not require a Clean Water Act – Section 404 Permit for Stream 6. The project would not require a Stream Buffer Variance.

Stream 7

Stream 7, an unnamed tributary of Clear Creek, is a fully impaired intermittent stream with a substrate of silt, sand, pebble, cobble, and vegetative debris. Unlike somewhat impaired streams, Georgia DNR designates fully impaired streams where there is a high loss of system stability and resilience, and where stream system recovery is unlikely to occur naturally without further bank erosion and/or sediment accumulation. The stream location is approximately 1,150 feet north of Polo Drive NE and approximately 575 feet west of Monroe Drive NE. Piping of the stream occurs, for most of its length, beneath a residential neighborhood and golf course.

At the time of the survey, there was low flow in the channel. The depth of the water in the channel ranged from 2 to 5 inches. An assessment of water clarity showed moderate

turbidity. The direction of flow crosses the project corridor from east to west, passing beneath an inactive railroad bed in a 3-foot diameter cylindrical culvert. Channel width varies from 6 to 10 feet, and the channel depth ranges from 2 to 4 feet. The bankfull width of the stream varies from 5 to 8 feet, and the bankfull depth of the resource ranges from 1 to 3 feet.

The stream has a low-quality riparian buffer that extends from zero to 20 feet from each bank. Residential and recreational development has heavily affected the stream buffer. Maintained residential lawns and a golf course are beyond the stream's riparian buffer. The stream has an ordinary high water mark, and the soils of the streambed are hydric. The channel exhibits moderate erosion and siltation. The channel has low sinuosity, and the stream banks are moderately stable. Stream 7 receives surface water runoff from mixed pine/hardwood forestland, abandoned railroad ROW, a golf course, and residential property.

This stream is not on the 2008 Georgia 303(d) stream listing, but it is a tributary of a listed stream (Clear Creek). Clear Creek does not support its designated use of fishing. The criteria violated are fecal coliform bacteria and dissolved oxygen levels. The potential causes for the violation are urban runoff/urban effects and combined sewer overflow. Stream 7 does not provide any potential habitat for protected species. There were no migratory birds or migratory bird nests within the existing Stream 7 culvert.

The culvert extension under the proposed action would impact Stream 7. Construction of the proposed project would result in 80 linear feet (0.02 acre) of impact to Stream 7. The project would not require a Stream Buffer Variance.

Stream 8

Stream 8, an unnamed tributary of Clear Creek, is a fully impaired intermittent stream with a substrate of silt, sand, pebble, and vegetative debris. The stream location is approximately 385 feet north of Polo Drive NE and approximately 650 feet west of Monroe Drive NE. Piping of the stream occurs beneath a residential neighborhood and channelized within a golf course.

At the time of the survey, there was low flow in the channel. The depth of the water in the stream ranged from 2 to 4 inches. An assessment of water clarity showed moderate turbidity. The direction of flow crosses the project corridor from east to west, passing beneath an inactive railroad bed in a 2-foot diameter cylindrical culvert. Channel width varies from 6 to 10 feet, and the channel depth ranges from 1 to 3 feet. The bankfull width of the stream varies from 3 to 9 feet, and the bankfull depth of the resource ranges from 6 inches to 1.5 feet.

The stream has a low-quality riparian buffer that extends zero to 15 feet from each bank. Residential and recreational development has heavily affected the stream buffer. Maintained residential lawns and a golf course are beyond the stream's riparian buffer. The stream has an ordinary high water mark, and the soils of the streambed are hydric. The channel exhibits moderate erosion and siltation. The channel has low sinuosity, and the stream banks are stable. Stream 8 receives surface water runoff from mixed pine/hardwood forestland, a golf course, abandoned railroad ROW, and residential property.

This stream is not on the 2008 Georgia 303(d) stream listing, but it is a tributary of a listed stream (Clear Creek). Clear Creek does not support its designated use of fishing. The criteria violated are fecal coliform bacteria and dissolved oxygen levels. The potential causes for the violation are urban runoff/urban effects and combined sewer overflow. Stream 8 does not provide any potential habitat for protected species. There were no migratory birds or migratory bird nests within the existing Stream 8 culvert.

The culvert extension under the proposed action would impact Stream 8. Construction of the proposed project would result in 72 linear feet (0.02 acre) of impact to Stream 8. The project would not require a Stream Buffer Variance.

Stream 9

Stream 9, Clear Creek, is a somewhat impaired perennial stream with a substrate of silt, sand, pebble, cobble, and boulder. Clear Creek is a tributary of Peachtree Creek. The stream location is approximately 1,000 feet southeast of Polo Drive NE and approximately 650 feet west of Monroe Drive NE.

At the time of the survey, there was normal flow in the channel. The water in the channel was approximately 6 inches to 3 feet deep. An assessment of water clarity showed moderate turbidity. The direction of flow crosses the project corridor from east to west, passing beneath an inactive railway bridge. Channel width varies from 15 to 25 feet, and the channel depth ranges from 2 to 6 feet. The bankfull width of the stream varies from 12 to 20 feet, and the bankfull depth of the resource ranges from 1 to 5 feet. The stream has a low-quality riparian buffer that extends five to 25 feet from each bank. Urban development has affected the stream buffer. Maintained residential lawns, commercial buildings, and a golf course are beyond the stream's riparian buffer. The stream has an ordinary high water mark, and the soils of the streambed are hydric. The channel exhibits moderate erosion and siltation. The channel has moderate sinuosity, and the stream banks are moderately stable. Stream 9 receives surface water runoff from mixed pine/hardwood forestland, residential property, commercial property, abandoned railroad ROW, and a golf course. Clear Creek is on the 2008 Georgia 303(d) stream listing. Clear Creek does not support its designated use of fishing. The criteria violated are fecal coliform bacteria and dissolved oxygen levels. The potential causes for the violation are urban runoff/urban effects and combined sewer overflow. Stream 9 does not provide any potential habitat for protected species. There were approximately four migratory bird (barn swallow) nests beneath the existing Stream 9 bridge.

The placement of a new box culvert as part of the proposed action would impact Stream 9. Construction of the proposed project would result in 94 linear feet (0.05 acre) of impact to Stream 9. The project would not require a Stream Buffer Variance.

Stream 10

Stream 10, Clear Creek, is a somewhat impaired perennial stream with a substrate of silt, sand, pebble, cobble, and boulder. Stream 10 is the same resource (Clear Creek) as Stream 9. The portion of Clear Creek that comprises Stream 10 is upstream of Stream 9. Clear Creek is a tributary of Peachtree Creek. The stream location is approximately 900 feet northwest of Piedmont Avenue NE and approximately 675 feet west of Monroe Drive NE.

At the time of the survey, there was normal flow in the channel. The water in the channel was approximately 6 inches to 2 feet deep. An assessment of water clarity showed moderate turbidity. The direction of flow parallels the project corridor from south to north, passing through an area of commercial and residential development. Channel width varies from 10 to 15 feet, and the channel depth ranges from 3 to 6 feet. The bankfull width of the stream varies from 8 to 12 feet, and the bankfull depth of the resource ranges from 2 to 4 feet.

The stream has a low-quality riparian buffer that extends 10 to 25 feet from each bank. Urban development has affected the stream buffer. Maintained residential lawns, commercial buildings, and an inactive railroad bed are beyond the stream's riparian buffer. The stream has an ordinary high water mark, and the soils of the streambed are hydric. The channel exhibits moderate erosion and siltation. The channel has moderate sinuosity, and the stream banks are moderately stable. Stream 10 receives surface water runoff from mixed pine/hardwood forestland, abandoned railroad ROW, and commercial property.

Clear Creek is on the 2008 Georgia 303(d) stream listing. Clear Creek does not support its designated use of fishing. The criteria violated are fecal coliform bacteria and dissolved oxygen levels. The potential causes for the violation are urban runoff/urban effects and combined sewer overflow. Stream 10 does not provide any potential habitat for protected species.

The proposed action would not impact Stream 10. The stream is beyond the project's proposed LOD. The project would require a Stream Buffer Variance for proposed work within the 25-foot buffer of Stream 10. The project would longitudinally encroach upon the 25-foot vegetative buffer of Stream 10 along the creek's west (left downstream) bank.

Stream 11

Stream 11, Clear Creek, is a somewhat impaired perennial stream with a substrate of silt, sand, pebble, cobble, boulder, and bedrock. Stream 11 is the same resource (Clear Creek) as Stream 9 and Stream 10. The portion of Clear Creek that comprises Stream 11 is upstream of Stream 9 and Stream 10. Clear Creek is a tributary of Peachtree Creek. The stream location is approximately 550 feet southeast of Piedmont Avenue NE and approximately 875 feet west of Monroe Drive NE.

At the time of the survey, there was normal flow in the channel. The water in the channel was approximately 6 inches to 3 feet deep. An assessment of water clarity showed moderate turbidity. The direction of flow crosses the project corridor from southwest to northeast, passing beneath an inactive railroad bridge. Channel width varies from 30 to 35 feet, and the channel depth ranges from 5 to 9 feet. The bankfull width of the stream varies from 25 to 30 feet, and the bankfull depth of the resource ranges from 3 to 6 feet.

The stream has a low-quality riparian buffer that extends from 25 to 35 feet from each bank. Urban development has affected the stream buffer. Residential apartment complexes and commercial buildings are beyond the stream's riparian buffer. The stream has an ordinary high water mark, and the soils of the streambed are hydric. The channel exhibits moderate erosion and siltation. The channel has moderate sinuosity, and the stream banks are moderately stable. Stream 11 receives surface water runoff

from mixed pine/hardwood forestland, residential property, abandoned railroad ROW, and commercial property.

Clear Creek is on the 2008 Georgia 303(d) stream listing. Clear Creek does not support its designated use of fishing. The criteria violated are fecal coliform bacteria and dissolved oxygen levels. The potential causes for the violation are urban runoff/urban effects and combined sewer overflow. Stream 11 does not provide any potential habitat for protected species. There were no migratory birds or migratory bird nests beneath the existing Stream 11 bridge.

The placement of a new box culvert as part of the proposed action would impact Stream 11. Construction of the proposed project would result in 60 linear feet (0.05 acre) of impact to Stream 11. The project would not require a Stream Buffer Variance.

Stream 12

Stream 12, an unnamed tributary of Clear Creek, is a fully impaired (disturbed) intermittent stream with a substrate of silt, sand, pebble, cobble, and boulder. At the point where the proposed alignment intersects the resource, the stream location is approximately 800 feet southeast of Piedmont Avenue NE and approximately 900 feet west of Monroe Drive NE.

At the time of the survey, there was no flow in the channel. However, pooling of water existed in several locations within the channel. The depth of the water in the pools ranged from approximately 1 to 4 inches. An assessment of water clarity showed high turbidity. The direction of flow crosses the project corridor from southeast to northwest, passing through commercial and municipal development. Channel width varies from 3 to 6 feet, and the channel depth ranges from 2 to 4 feet. The bankfull width of the stream varies from 2 to 5 feet, and the bankfull depth of the resource ranges from 1 to 3 feet.

The stream has a low-quality riparian buffer that extends zero to 25 feet from the right downstream bank and zero to 45 feet from the left downstream bank. Urban development has affected the stream buffer. Commercial buildings and a construction site are beyond the stream's riparian buffer. The stream has an ordinary high water mark, and the soils of the streambed are hydric. The channel exhibits moderate erosion and siltation. The channel has moderate sinuosity, and the stream banks are somewhat unstable. Trash and debris were scattered throughout the channel. Stream 12 receives surface water runoff from mixed pine/hardwood forestland, a construction site, abandoned railroad ROW, and commercial property.

This stream is not on the 2008 Georgia 303(d) stream listing, but it is a tributary of a listed stream (Clear Creek). Clear Creek is on the 2008 Georgia 303(d) stream listing. Clear Creek does not support its designated use of fishing. The criteria violated are fecal coliform bacteria and dissolved oxygen levels. The potential causes for the violation are urban runoff/urban effects and combined sewer overflow. Stream 12 does not provide any potential habitat for protected species.

The placement of a new culvert as part of the proposed project would impact Stream 12. Construction of the proposed project would result in 65 linear feet (0.01 acre) of impact to Stream 12. The project would not require a Stream Buffer Variance.

Stream 13

Stream 13, Clear Creek, is a somewhat impaired perennial stream with a substrate of silt, sand, pebble, cobble, boulder, and bedrock. Stream 13 is the same resource (Clear Creek) as Stream 9, Stream 10, and Stream 11. The portion of Clear Creek that comprises Stream 13 is upstream of Stream 9, Stream 10, and Stream 11. Clear Creek is a tributary of Peachtree Creek. The stream location is approximately 1,110 feet southeast of Piedmont Avenue NE and approximately 1,010 feet west of Monroe Drive NE.

At the time of the survey, there was normal flow in the channel. The water in the channel was approximately 6 inches to 3 feet deep. An assessment of water clarity showed moderate turbidity. The direction of flow crosses the project corridor from south to north, emerging from a municipal water treatment facility. Channel width varies from 30 to 35 feet, and the channel depth ranges from 5 to 9 feet. The bankfull width of the stream varies from 25 to 30 feet, and the bankfull depth of the resource ranges from 3 to 6 feet.

The stream has a low-quality riparian buffer that extends 5 to 35 feet from each bank. Urban development has affected the stream buffer. Commercial buildings, a water treatment facility, a construction site, and a city park are beyond the stream's riparian buffer. The stream has an ordinary high water mark, and the soils of the streambed are hydric. The channel exhibits moderate erosion and siltation. The channel has moderate sinuosity, and the stream banks are moderately stable. Stream 13 receives surface water runoff from mixed pine/hardwood forestland, municipal land, abandoned railroad ROW, and a construction site.

Clear Creek is on the 2008 Georgia 303(d) stream listing. Clear Creek does not support its designated use of fishing. The criteria violated are fecal coliform bacteria and dissolved oxygen levels. The potential causes for the violation are urban runoff/urban effects and combined sewer overflow. Stream 13 does not provide any potential habitat for protected species.

The proposed action would not impact Stream 13. The stream is beyond the project's proposed LOD. The project would require a Stream Buffer Variance for proposed work within the 25-foot buffer of Stream 13. The proposed project would longitudinally encroach upon the 25-foot vegetative buffer of Stream 13 along the creek's east (right downstream) bank.

Wetland 14

Wetland 14 is a saturated, palustrine scrub/shrub wetland along the edge of Piedmont Park near a Park Drive NE bridge. The wetland encompasses a low-lying area between the existing railbed and the public park. The wetland receives runoff from the transportation ROW, abandoned railroad ROW, and a public park (Piedmont Park). The USACE system classification is low quality resulting from its presence in fragmented habitat, being of limited size, and supporting the growth of invasive plant species. Wetland 14 does not provide any potential habitat for protected species. Construction of the proposed project would not impact Wetland 14.

4.1.2 Avoidance and Minimization

In accordance with USEPA Section 404(b)(1) guidelines for specification of disposal sites for dredged or fill material (under the federal Clean Water Act), the EER assessment considered alternatives to avoid and minimize wetland and stream impacts. GEPA and other regulations require consideration of a number of other environmental factors during the assessment of project alternatives. Considerations of alternatives were to avoid impacts to environmental resources, including waters of the U.S. and State, as much as possible.

The project would consist of both construction along existing transportation corridors and construction on the proposed location alignment. The proposed alignment, approximately 6.5 miles in length, would permanently impact up to 414 linear feet (0.17 acre) of jurisdictional perennial and intermittent streams. Construction of the proposed project would not result in any impacts to jurisdictional wetlands, open waters, or ephemeral streams.

The project would not impact the following six systems, which are outside of the LOD of the proposed transit and trail alignment options: Stream 1, Wetland 5, Ephemeral Stream 6, Stream 10, Stream 13, and Wetland 14. The project would also avoid impacts to Stream 3 and Stream 4 because the proposed transit and trail alignment options would utilize a bridge at these crossings.

The proposed project would cross Stream 2 perpendicularly by the portion of the multi-use trail that extends along the north bank of Peachtree Creek (Stream 3 and Stream 4). The project proposes placement of a new box culvert for this stream crossing. The project cannot avoid the stream crossing by shifting the alignment of the multi-use trail to the north. Shifting the alignment of the multi-use trail to the south would either introduce longitudinal stream channel impacts to Peachtree Creek or require a crossing of Peachtree Creek. A crossing of Peachtree Creek at this location could be very costly (construction of a new bridge or placement of a new bottomless culvert) and could introduce impacts to the creek (bridge piers placed in the stream channel or placement of a box culvert). The proposed project could avoid impacts to Stream 2 by constructing a bridge or placing a bottomless culvert at the multi-use trail crossing, but it would not be very cost effective. The most practical alternative for the multi-use trail crossing of Stream 2 is the placement of a new box culvert along the currently proposed alignment.

The proposed project would cross Stream 7 and Stream 8 perpendicularly by the alignment that follows the former railroad ROW east of Ansley Golf Club. The project proposes the extension of an existing cylindrical culvert for these stream crossings. The project could avoid the culvert extensions by shifting the alignment either to the east or considerably to the west. However, shifting the alignment to the east would result in the displacements of several private residences, and shifting the alignment to the west would result in impacts to a private golf course. The project could avoid impacts to Streams 7 and 8 by placing a new bottomless culvert at the existing stream crossings; however, this would not be very cost effective. The most practical alternatives for the proposed crossings of Stream 7 and Stream 8 are the extensions of the existing culvert along the currently proposed alignment.

The proposed project would cross Stream 9 (Clear Creek) perpendicularly by the alignment that follows the former railroad ROW east of Ansley Golf Club. The project

proposes the placement of a new box culvert for this stream crossing. The project cannot avoid the stream crossing by shifting the alignment to the west. The project could avoid the placement of a new box culvert by shifting the alignment to the east, but this would result in the displacements of several commercial businesses. The project could avoid impacts to Stream 9 by the construction of a new bridge or the placement of a new bottomless culvert at the existing stream crossing, but this would not be very cost effective. The most practical alternative for the proposed crossing of Stream 9 is the placement of a new box culvert along the currently proposed alignment.

The proposed project would cross Stream 11 (Clear Creek) perpendicularly by the alignment that follows the former railroad ROW east of Piedmont Park. The project proposes the placement of a new box culvert for this stream crossing. The project cannot avoid the stream crossing by shifting the alignment to the east. The project could avoid placement of a new box culvert by shifting the alignment to the west, but this would result in impacts to Piedmont Park. The project could avoid impacts to Stream 11 by the construction of a new bridge or the placement of a new bottomless culvert at the existing stream crossing, but this would not be very cost effective. The most practical alternative for the proposed crossing of Stream 11 is the placement of a new box culvert along the currently proposed alignment.

The proposed project crosses Stream 12 perpendicularly by the alignment that follows the former railroad ROW east of Piedmont Park. The project proposes the placement of a new box culvert for this stream crossing. The project cannot avoid the stream crossing by shifting the alignment of the proposed project to the east. Shifting the alignment of the proposed project to the west would either introduce longitudinal stream channel impacts to Clear Creek (Stream 13) or require a crossing of Clear Creek. A crossing of Clear Creek at this location could be very costly (construction of a new bridge or placement of a new bottomless culvert) and could introduce impacts to the creek (e.g., bridge piers placed in the stream channel or placement of a box culvert). A crossing of Clear Creek at this location could also result in impacts to Piedmont Park and the Atlanta Botanical Gardens. The project could avoid impacts to Stream 12 by placing a bottomless culvert at the proposed stream crossing, but this would not be very cost effective. The most practical alternative for the proposed crossing of Stream 12 is the placement of a new box culvert along the currently proposed alignment.

4.1.3 Wetland and Ephemeral Stream Mitigation

Construction of the proposed project would not require compensatory wetland and ephemeral stream mitigation.

The proposed action would not impact jurisdictional wetlands. The field survey resulted in the identification of two wetlands, Wetland 5 and Wetland 14. The wetlands are beyond the proposed project's LOD.

The proposed action would not impact jurisdictional ephemeral streams. Ephemeral streams mitigation would be equivalent to mitigation for impacted wetlands. The field survey identified one ephemeral stream, Stream 6. The ephemeral stream is beyond the proposed project's LOD.

4.1.4 Perennial and Intermittent Stream Mitigation

The proposed action would impact six jurisdictional perennial and intermittent streams (Stream 2, Stream 7, Stream 8, Stream 9, Stream 11, and Stream 12) for as much as 414 linear feet (0.17 acre). The placement of new culverts or the extension of existing structures would impact these streams. Project implementation would require approximately 1,306 compensatory stream mitigation credits. The Atlanta Development Authority and/or MARTA would purchase mitigation credits from an approved mitigation bank that services the project area.

4.1.5 Stream Buffer Mitigation

The proposed action would not encroach on any land within 25 feet of open water (e.g., pond or lake). However, the project would longitudinally encroach on the 25-foot vegetative stream buffer of the following streams: Stream 2, Stream 3, Stream 4, Stream 10, and Stream 13. Therefore, based on the criteria outlined in Rule 391-3-7.05 under the DNR Environmental Protection Division (EPD) Erosion and Sedimentation Control Branch, in accordance with the Georgia Erosion and Sedimentation Act of 1975, as amended, the project would require Stream Buffer Variances for project implementation.

4.1.6 Summary of Findings

Project implementation would require approximately 1,306 compensatory stream mitigation credits. A Clean Water Act – Section 404 Permit would be required for the impacts associated with this project. Stream Buffer Variances would be required for five streams.

4.2 Floodplains

As required by the provisions of Executive Order 11988, Floodplain Management, a survey of the project corridor for floodplains has identified transverse crossings and longitudinal encroachments of the 100-year floodplains of Peachtree Creek and Clear Creek. Construction of the project would require the placement of fill material in the floodplains.

Figure 4-4, Figure 4-5, and Figure 4-6 illustrate the encroachments of floodplains in the Armour/Lindbergh, Montgomery Ferry/Ansley, and Piedmont Park areas, respectively. No encroachment areas exist south of the Piedmont Park area.

The project design would ensure there would be no significant encroachment on these floodplains. The total affected area in the 100-year floodplain for Peachtree Creek would be:

- 360,824 square feet (8.28 acres) for Transit/Trails Option 1;
- 362,515 square feet (8.32 acres) for Transit Option 1A/Trails Option 1;
- 185,936 square feet (4.27 acres) for Transit/Trails Option 2; and
- 252,584 square feet (5.80 acres) for Transit/Trails Option 3.

Figure 4-4: 100-Year Floodplain (Armour/Lindbergh Area)

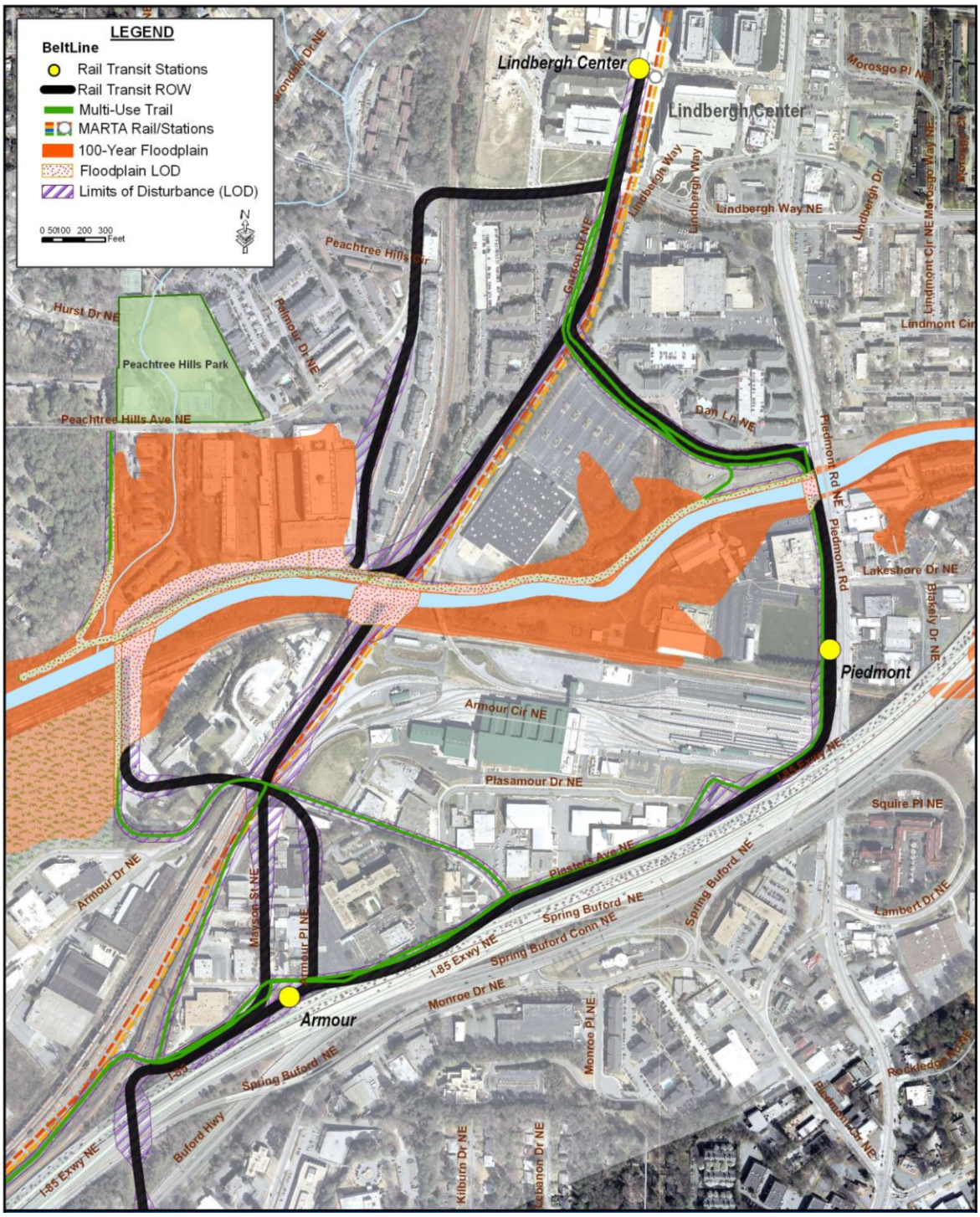


Figure 4-5: 100-Year Floodplain (Montgomery Ferry/Ansley Area)

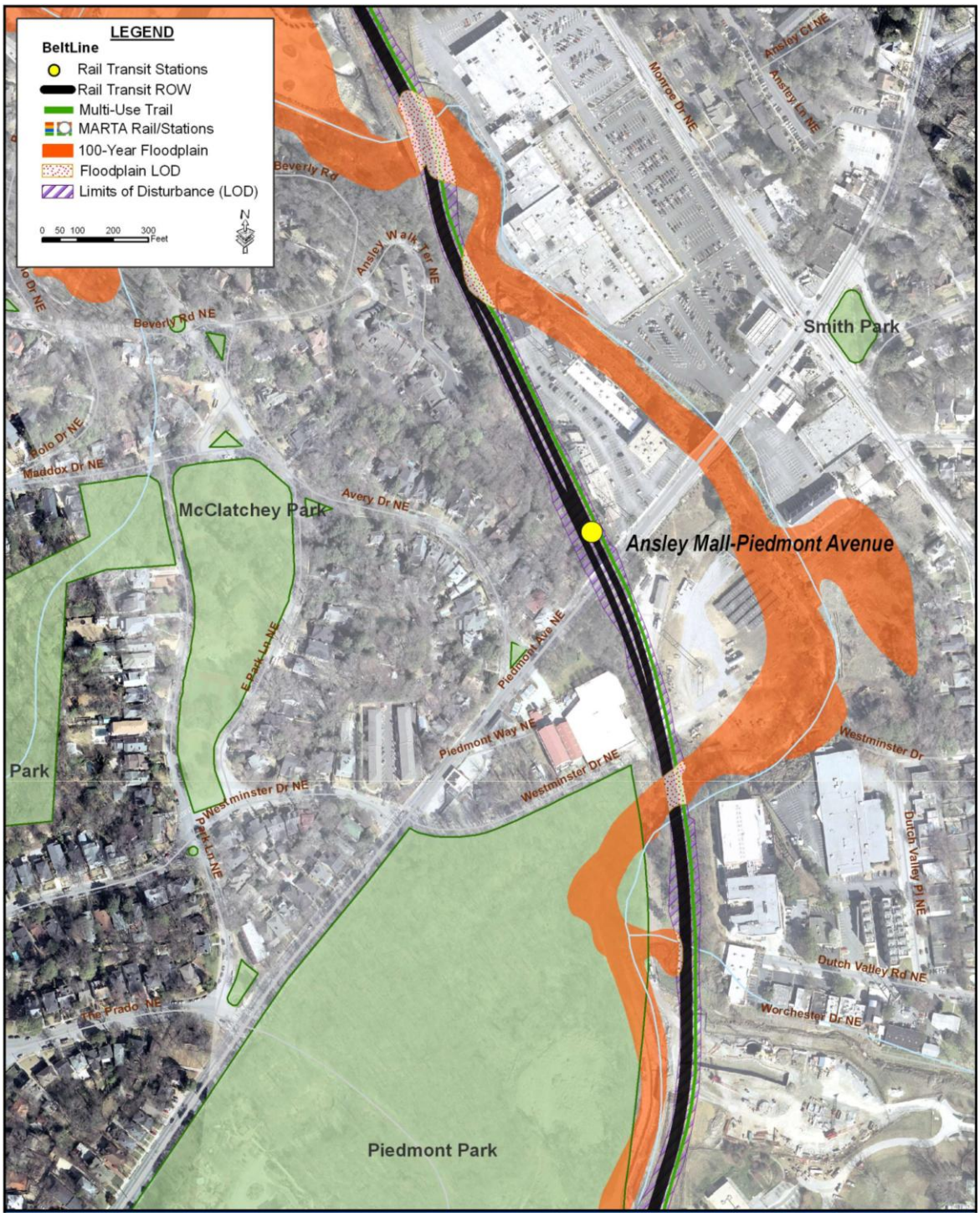
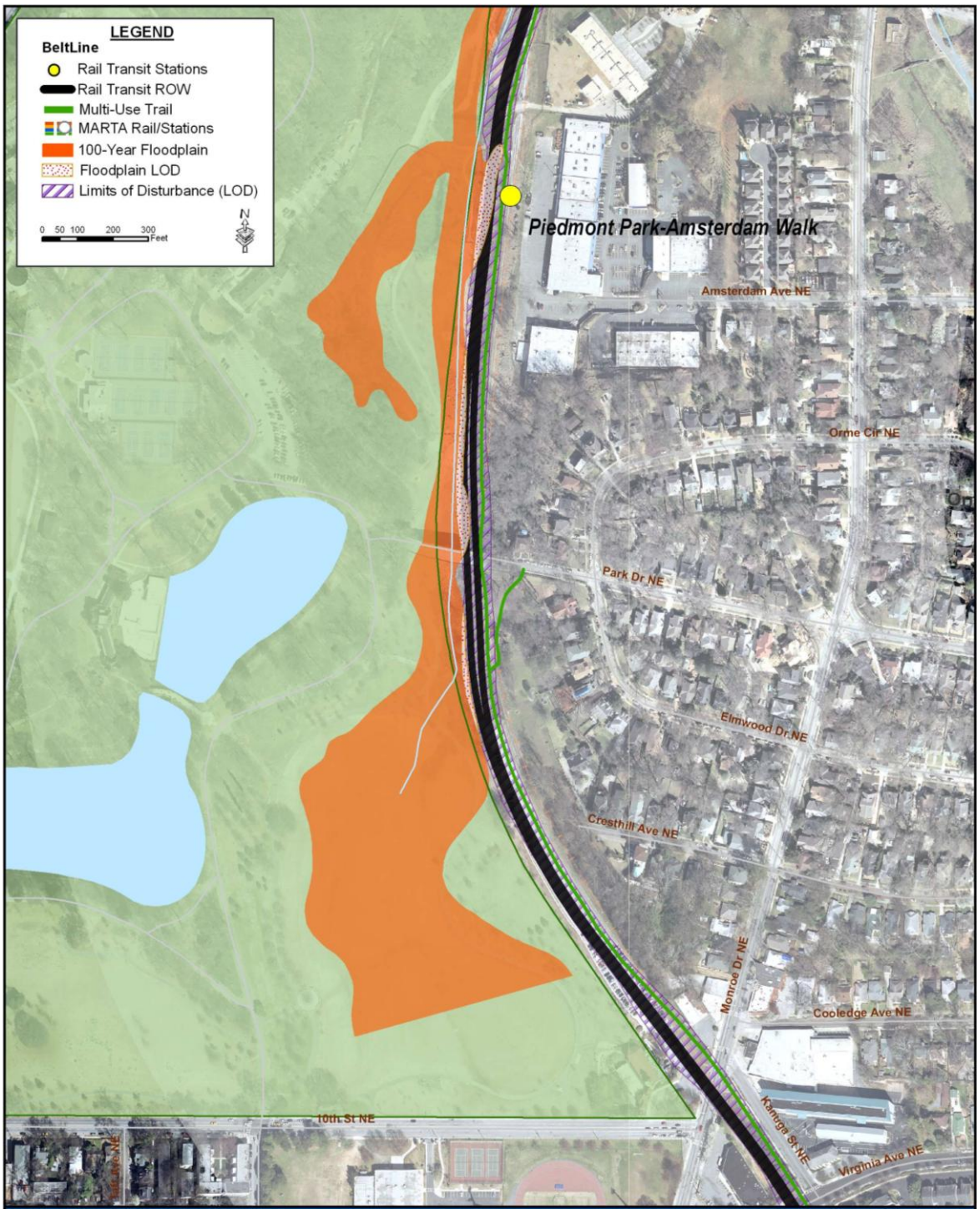


Figure 4-6: 100-Year Floodplain (Piedmont Park Area)



South of I-85, all of the options would impact 62,337 square feet (1.43 acres) of the 100-year floodplain associated with Clear Creek.

Applying criteria of significance to the above floodplain encroachments, the project would not:

- represent a significant risk to life or property;
- have a significant impact on natural and beneficial floodplain values;
- support incompatible floodplain development; or
- interrupt or terminate a transportation facility necessary for emergency vehicles or providing a community's only evacuation route.

Fulton County and the City of Atlanta are participating members of the National Flood Insurance Program. The proposed action would result in encroachments on the regulatory floodways of Peachtree Creek and Clear Creek. The proposed project design would minimize impacts on these regulatory floodways. After MARTA and ABI select an alternative alignment, and the project enters the design phase, these parties will initiate coordination with the Federal Emergency Management Agency (FEMA), and will notify the Georgia DNR of the project's regulatory floodway involvement.

4.3 Storm Water

The proposed action would contribute no more than the current rate of runoff to downstream properties and drainage facilities. The project would construct a system of storm water management that contains all storm runoff resulting from additional impervious surface attributed to the proposed project construction. The system would include erosion, sedimentation, and pollution control structures to prevent contaminants from entering the storm water system.

4.4 Waste Water

All waste water from the facilities constructed via the proposed action would be collected and properly disposed in accordance with local, state, and federal waste water treatment and disposal regulations.

4.5 Air Quality

Metropolitan Atlanta is currently designated a nonattainment area for ozone and fine particulate matter (PM2.5) by the USEPA. According to the ARC, the BeltLine is contained in the *Envision6* RTP and the FY 2008-2013 TIP. As such, the project is contained in the air quality models for the Metropolitan Atlanta nonattainment area for ozone and fine particulates. Therefore, the project conforms on a regional level to the National Ambient Air Quality Standards (NAAQS) for both ozone and PM2.5 because the project is part of a conforming RTP and TIP.

A mesoscale analysis is not necessary to disclose regional emissions resulting from the project because quantification of these emissions occurred during development of the RTP. Discharges and releases of any contaminants into the air resulting from the

construction and operation of facilities for transit and multi-use trails are subject to regulation under the Georgia Air Quality Control Act and the NAAQS.

4.6 Solid Wastes/Solid Waste Landfills

The rules and regulations incorporated in the Georgia Comprehensive Solid Waste Management Act and codified as Georgia Environmental Rule 391-3-4 govern the generation and disposal of solid waste in the State of Georgia. This EER reviewed solid waste landfills and the generation or disposal of solid waste, in accordance with the GEPA guidelines issued on July 1, 1991 by the Georgia EPD, to determine any applicable impacts.

4.6.1 Solid Waste

Solid waste generated during the development of the proposed alignment would be primarily attributable to Construction and Demolition (C&D). The State of Georgia defines C&D as waste resulting from construction, remodeling, repair, and demolition operations on pavements, houses, commercial buildings and other structures. Examples include asbestos, wood, bricks, metal, concrete, wallboard, asphalt shingles, and other inert waste from C&D operations. Additional C&D waste generation could occur during the operations of the BeltLine Corridor by way of maintenance activities to the stations, facilities, and the railbed including relic railroad ties. During project design, MARTA and ABI would examine the feasibility of reusing any potential C&D material.

During the operations of the BeltLine Corridor, disposal activities could also include removal of industrial wastes relating to the maintenance and operations of the rail line, rail cars, engines, and ancillary facilities. These materials could be either non-hazardous or hazardous waste (e.g., waste oil). Solid waste generation would also occur from operation of the stations and ancillary facilities, characterized as municipal solid waste (MSW). The BeltLine Corridor project design process will allow estimations of the potential types and amounts of waste generation.

The construction and operation of the BeltLine project would generate solid and/or hazardous waste. Management and disposal of all wastes generated during the development of the project would be in accordance with all federal, state, and local regulations inclusive of the State of Georgia rules and regulations shown in Table 4-2, as applicable.

4.6.2 Solid Waste Landfills

The EER assessment included an evaluation of the proposed project's potential effect on available landfill space. The number of operating landfills and capacity in the State of Georgia has increased in recent years. The evaluation included a review of the February 2004 Active Georgia Municipal Solid Waste (MSW) and Construction and Demolition (C&D) Landfills report by the Georgia Department of Community Affairs (DCA) Office of Environmental Management. There were 58 MSW landfills (including six older unlined landfills) and 51 C&D landfills operating and accepting solid waste in the State of Georgia in 2003. The latter number is an increase from an average of 34 C&D facilities operating between 1994 and 2001.

Table 4-2: Georgia Environmental Rules and Laws Governing Solid and Hazardous Waste

Environmental Rule	Authorizing Statute (Law)
• GA Environmental Rule 391-3-4 • Solid Waste Management	• Georgia Comprehensive Solid Waste Management Act of 1990 • Georgia Litter Control Law • Georgia Waste Control Law
• GA Environmental Rule 391-3-11 • Hazardous Waste Management	• Georgia Hazardous Waste Management Act • Georgia Hazardous Site Response Act • Georgia Hazardous Site Reuse and Redevelopment Act • Oil or Hazardous Spills or Releases • Mitigating Effect of Hazardous Materials Discharge
• GA Environmental Rule 391-3-14 • Asbestos Removal & Encapsulation	• Georgia Asbestos Safety Act
• GA Environmental Rule 391-3-19 • Hazardous Site Response	• Georgia Hazardous Waste Management Act • Georgia Hazardous Site Response Act • Georgia Hazardous Site Reuse and Redevelopment Act
• GA Environmental Rule 391-3-24 • Lead Based Paint Abatement, Certification and Accreditation	• Georgia Lead Poisoning Prevention Act of 1994

According to the EPD Solid Waste Disposal Facilities November 2008 database, the number of landfills operating in 2007 included 51 MSWs and 48 C&D facilities, which is relatively consistent with the DCA's February 2004 report.

The available permitted landfill capacity also grew steadily from 1994 through 2002. Based upon the disposal practices observed in 2003, there is a projection of slightly over 25 years of remaining disposal capacity for the 58 MSW landfills. As indicated in the EPD *Solid Waste Trust Fund Activity Report*, during Fiscal Year 2007, a little over 4 million tons of construction / demolition debris were disposed into Georgia landfills.

A review of solid waste permitted disposal facilities with available capacity revealed seven C&D landfills and three MSW landfills currently operating within DeKalb and Fulton Counties. At least one MSW and two C&D sites in these counties will have remaining landfill space available between 2016 and 2099. The proposed action, therefore, will not result in significant impacts to available landfill capacity.

The EER assessment included an environmental records review for all sites within a 0.25-mile distance of the proposed project corridor. According to the findings, there were no solid waste landfills within the 0.25-mile radius of the proposed alignment.

4.7 Soil Stability/Erodibility

The proposed construction would require grading of areas adjacent to existing paving and, in doing so, would increase the potential for soil erosion. Such erosion could result in the pollution of nearby streams and/or sediment washing onto adjacent properties.

Section 4.1.5 of this EER identifies potential stream encroachments and buffer variance requirements, in accordance with the Georgia Erosion and Sedimentation Control Act.

Provisions in the construction contract for the proposed project would require the contractor to exercise every reasonable precaution during construction to prevent the pollution of streams in the project vicinity. Early re-vegetation of disturbed areas, where possible, would hold soil movement to a minimum.

Additional contract provisions would require the use of temporary erosion control measures as shown on the construction plans or as deemed necessary during construction. These temporary measures may include the use of berms, dikes, dams, sediment basins, fiber mats, netting, gravel, mulches, grasses, slope drains, and other erosion control devices or methods, as applicable. These provisions would be coordinated with permanent erosion control features insofar as practical to assure economical, effective, and continuous erosion control during and following the construction period.

4.8 Historic Resources

The EER assessment included a review of existing information on previously identified historic properties to determine if any are within the Area of Potential Effect (APE) of this undertaking. The APE represents the geographic area(s) within which an undertaking may alter the character or use of historic properties. This review included properties listed in the National Register of Historic Places (NRHP, or National Register) or the Georgia Register of Historic Places, proposed National Register nominations, National Historic Landmarks and the updated Georgia Historic Bridge Survey (GHBS). The EER assessment did not include consultation of the 1976 Georgia DNR Fulton County Survey, as it was not reliable because of its age. The assessment also did not include consultation of the 1992 Georgia DNR Atlanta (Martin Luther King, Jr. National Historic Landmark District only, inclusive of parcels outside of the APE) and the 1995 Georgia DNR Fulton County (North Fulton and Sandy Springs only) Surveys, which encompassed areas currently outside the project study area. The EER assessment did include consultation of the Natural, Archaeological, and Historic Resources Geographical Information System (NAHRGIS) database of previously identified properties, maintained by the University of Georgia.

Following the review of existing information on previously identified historic properties, the EER assessment also included the identification of potential consulting parties in the Section 106 process. In addition to the Georgia Statewide Historic Preservation Office (SHPO), the EER assessment included identification and early consultation of other potential parties, based on the nature of the undertaking and guidance contained in state and federal cultural resource survey guidelines. Section 7.1 of the EER lists agencies solicited for early consultation.

The study team coordinated with the Georgia SHPO and other agencies with an interest in cultural resources during the surveys for archaeological and historic resources. The study team met with the Atlanta Urban Design Commission (AUDC) in late August and September 2008 to discuss AUDC's efforts in identifying and surveying historic resources around the entire BeltLine Corridor. The AUDC provided copies of their survey reports, maps and building summaries, and additional background research materials, which assisted with resource identification.

In September 2008, the team met with SHPO representatives to introduce the project and discuss the environmental study process, survey methodology, and design considerations. The second meeting, in December 2008, updated the SHPO on the status and progress of the survey. The third meeting, in January 2009, included discussions of conceptual planning of selected areas along the Northeast Zone. The meeting included discussions on the *Historic Resources Survey Report*.

Additional information received from consulting parties, field surveys, and background research within the APE of the proposed project served to identify any historic properties or archaeological sites eligible for listing in the National Register. The survey included the application of NRHP criteria (Table 4-3) to assess eligibility for individual resources. During the field survey and while conducting research on historic resources found along the project corridor, interviews were conducted with various property owners regarding the history of the resources. The *Historic Resources Survey Report* and a *Phase I Archaeological Survey* summarized the results of the field surveys and background research. Section 4.9 includes a discussion of the findings from the latter survey.

Table 4-3: NRHP Criteria for Evaluation of Cultural Resources

NRHP Criterion	Description
A	Association with events that have made a significant contribution to the broad patterns of our history
B	Association with the lives of persons significant in our past
C	Embodiment of distinctive characteristics of a type, period, or method of construction; representation of the work of a master; possession of high artistic values; or representation of a significant and distinguishable entity whose components may lack individual distinction
D	Yielded, or is likely to yield, information important in prehistory or history

From these efforts, the EER assessment resulted in the identification of 39 National Register listed or eligible historic properties and districts within the proposed project's 0.25-mile study area. These included 17 National/Georgia Register listed properties/districts and 22 National/Georgia Register eligible properties/districts.

Of those 39 properties and districts, the following 20 have been determined to be outside of the APE:

- Oakland Cemetery (248 Oakland Avenue SE);
- Cabbagetown Historic District;
- Reynoldstown Historic District;
- Midtown Historic District;
- Atlanta Fire Department Station No. 29, (2167 Monroe Drive NE);

- American Red Cross Building (1955 Monroe Drive NE);
- Trust Company Bank (2160 Monroe Drive NE);
- Morningside Shopping Center (Piedmont Avenue NE at Monroe Drive NE);
- Morningside Historic District;
- Morningside Hills Historic District;
- Boulevard Substation Complex (north of Amsterdam Avenue NE, east of Monroe Drive NE);
- 790 Ponce de Leon Avenue;
- South of Ponce de Leon Avenue Historic District;
- Willoughby Way Historic District;
- WSB-TV (766 Willoughby Way NE);
- Rhodes House (346 Copenhill Avenue NE);
- Ray House (729 Krog Street NE)
- Monroe Drive Houses (Monroe Drive NE between Amsterdam Avenue NE and Cumberland Road NE)
- North Highland Historic District; and
- The Eifrid Building (753 Edgewood Avenue NE).

Therefore, 19 properties and districts are within the APE of the project. A copy of the NRHP nomination form for each listed property/district and a copy of the Property Information Form for each eligible property/district are included in the report *Historic Resources Survey Report, Atlanta BeltLine Northeast Zone, Atlanta, Fulton County, Georgia, (February 2009),* bound under separate cover. Table 4-4 lists the properties and districts within the APE and Figure 4-7 through Figure 4-14 illustrate historic properties and districts in relation to the Northeast Zone study area.

Table 4-4: National/Georgia Register Listed/Eligible Properties in Area of Potential Effect

ID #	Name of Resource	Property Type	Location	National/Georgia Register Status or Recommendation
1	Ansley Park Historic District	Residential Historic District and Golf Club	Bounded by 15th Street NE, Atlanta Development Authority right-of-way, and Piedmont Avenue NE	LISTED 04-20-1979
2	Piedmont Park	Public Park and Exposition Site	Bounded by 10th Street NE, Piedmont Road NE, and Atlanta Development Authority right-of-way	LISTED 05-13-1976
3	Virginia-Highland Historic District	Residential District	Bounded by Ponce de Leon Avenue NE, Amsterdam Avenue NE, Atlanta Development Authority right-of-way, and Rosedale Road NE	LISTED 05-10-2005

ID #	Name of Resource	Property Type	Location	National/Georgia Register Status or Recommendation
4	Martin Luther King, Jr. Historic District	Residential, Commercial, Institutional, and Industrial District	Bounded by Edgewood Avenue NE, Irwin Street NE, Courtland Street NE, John Wesley Dobbs Avenue NE, and Freedom Parkway NE	LISTED 1974 Boundary Increases 1980, 1994, 2001
5	Inman Park Historic District	Residential District	Bounded by DeKalb Avenue NE, Lake Avenue NE, Krog Street NE, and Hurt Street NE	LISTED 1973 Boundary Increase 2001
6	Inman Park-Moreland Historic District	Residential District	Bounded by DeKalb Avenue NE, Cleburne Avenue NE Freedom Park, and Moreland Avenue NE, Battery Place NE	LISTED 1986 Boundary Increase 2003

ID #	Name of Resource	Property Type	Location	National/Georgia Register Status or Recommendation
7	Historic Railroad Resources of the Atlanta BeltLine Northeast Zone	Railroad structures and building and bridge structures	• Armour Yard • Former Southern Railway Corridor (including railway within ADA right-of-way) • Hulsey Yards • Terminal Building (240 Highland Avenue NE) • Norfolk Southern bridge over Lindbergh Drive NE (GDOT Bridge 121-0507-0) • Norfolk Southern bridge over Armour Drive NE (GDOT Bridge 121-5135-0) • Norfolk Southern bridge over I-85 (GDOT Bridge 121-0488-0) • Clear Creek Trestle • Clear Creek Bridge • Clear Creek Brick Arch Culvert • Park Drive NE bridge over ADA right-of-way and Peachtree Creek tributary (GDOT Bridge 121-5088-0) • Piedmont Avenue NE bridge over ADA right-of-way (GDOT Bridge 121-0036-0) • Virginia Avenue NE bridge over ADA right-of-way (GDOT Bridge 121-0408-0) • ADA right-of-way bridge over Ponce de Leon Avenue NE (GDOT Bridge 121-0491-0) • ADA right-of-way bridge over Ralph McGill Boulevard NE (GDOT Bridge 121-0515-0) • Edgewood Avenue NE bridge over ADA right-of-way (GDOT Bridge 121-0024-0) • CSX bridge over Boulevard SE (GDOT Bridge 121-0527-0) • CSX bridge Estoria Street SE/Krog Street NE (GDOT Bridge 121-5148-0)	ELIGIBLE
8	Atlanta's Historic Apartment Complexes 430 Lindbergh Drive	Apartment Complexes	430 Lindbergh Drive NE	ELIGIBLE
9	Peachtree Hills	Residential District	Bounded by Sharondale Drive NE, Peachtree Creek, Glenwood Road NE, Lindbergh Drive NE, and Sharondale Court NE	ELIGIBLE

ID #	Name of Resource	Property Type	Location	National/Georgia Register Status or Recommendation
10	Orkin-Rollins Building	Office and Warehouse Buildings	2162, 2170 Piedmont Road NE	ELIGIBLE
11	441 Armour Drive	Commercial Building	441 Armour Drive NE	ELIGIBLE
12	2131 Old Plasters Bridge Road	Commercial Building	2131 Old Plasters Bridge Road NE	ELIGIBLE
13	Mason Chapel Baptist Church/Masonic Lodge	Front Gabled Church and Lodge	113 Mayson Street NE	ELIGIBLE
14	1904 Monroe Drive	Office International Style Building	1904 Monroe Drive NE	ELIGIBLE
15	Piedmont Heights	Residential District	Bounded by Piedmont Road NE, Montgomery Ferry Road NE, Flagler Avenue NE, north ends of Kilburn Drive NE and Lebanon Drive NE, and Gotham Way NE	ELIGIBLE
16	Pylant-Drewry-Greenwood Historic District	Commercial and Industrial District	• 665 Pylant Street NE • 675, 680 Drewry Street NE • 686 Greenwood Avenue NE • 710, 712, 729, 730, 740, 750 Ponce de Leon Place NE	ELIGIBLE
17	Ponce de Leon-Ralph McGill Historic District	Industrial District	• 675, 699 Ponce de Leon Avenue NE • 710, 712, 729, 730, 740, 750 Ponce de Leon Place NE • 621, 695 North Avenue NE • 575, 650 Glen Iris Drive NE • 723, 750, 794, 820 Ralph McGill Boulevard NE • 568, 580, 591 Somerset Terrace NE	ELIGIBLE
18	Krog Street-Southern Railway Historic District	Commercial and Industrial District	• 154, 130, 112, 99 Krog Street NE • 700 Lake Avenue NE • 151 Sampson Street NE • 660, 716, 724 Edgewood Avenue NE • 710 DeKalb Avenue NE	ELIGIBLE
19	Inman Motor Works	Commercial and Industrial	820, 834 DeKalb Avenue NE	ELIGIBLE

Figure 4-7: Historic Resources (Armour/Lindbergh Area, Option 1 and Option 1A)

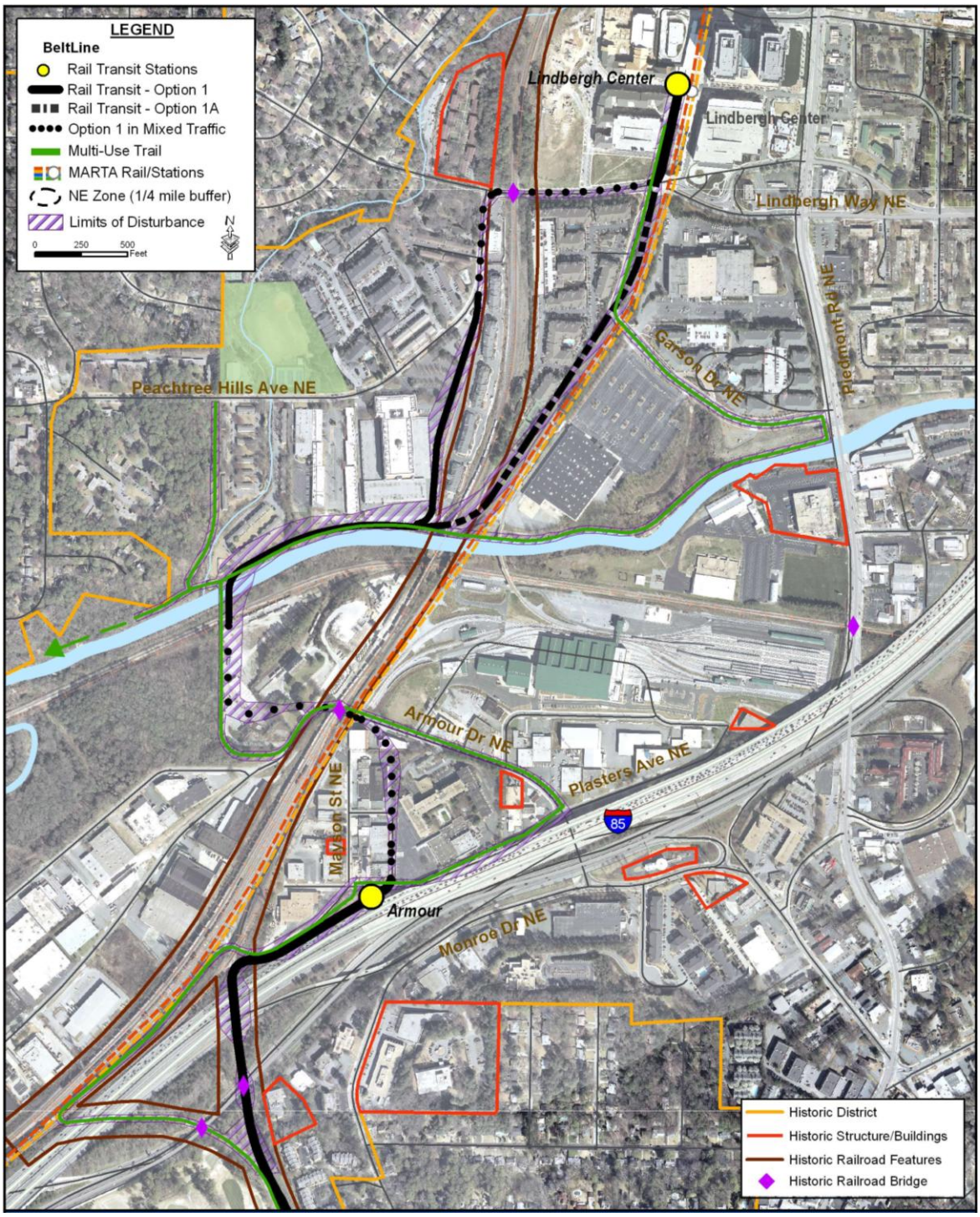


Figure 4-8: Historic Resources (Armour/Lindbergh Area, Option 2)

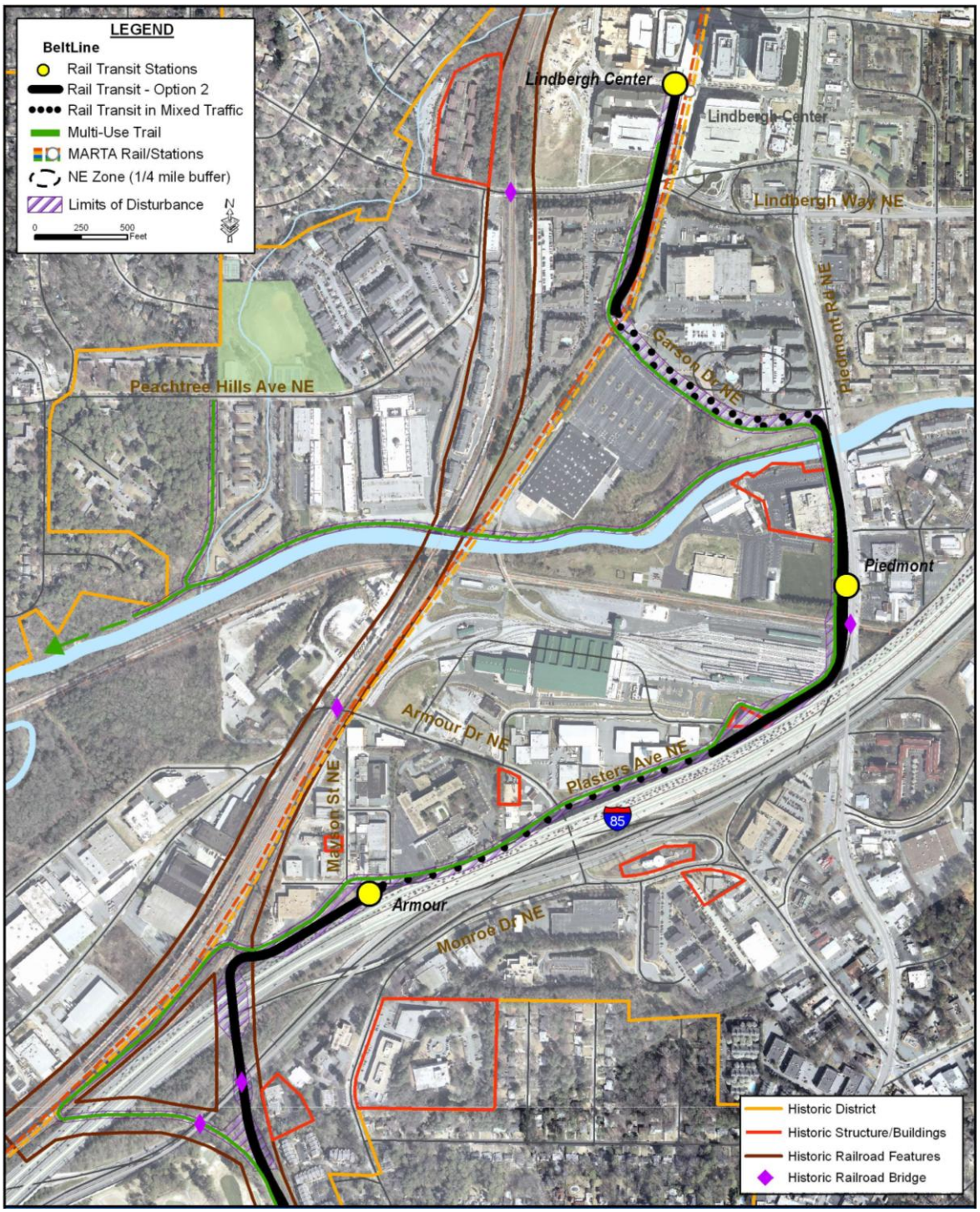


Figure 4-9: Historic Resources (Armour/Lindbergh Area, Option 3)

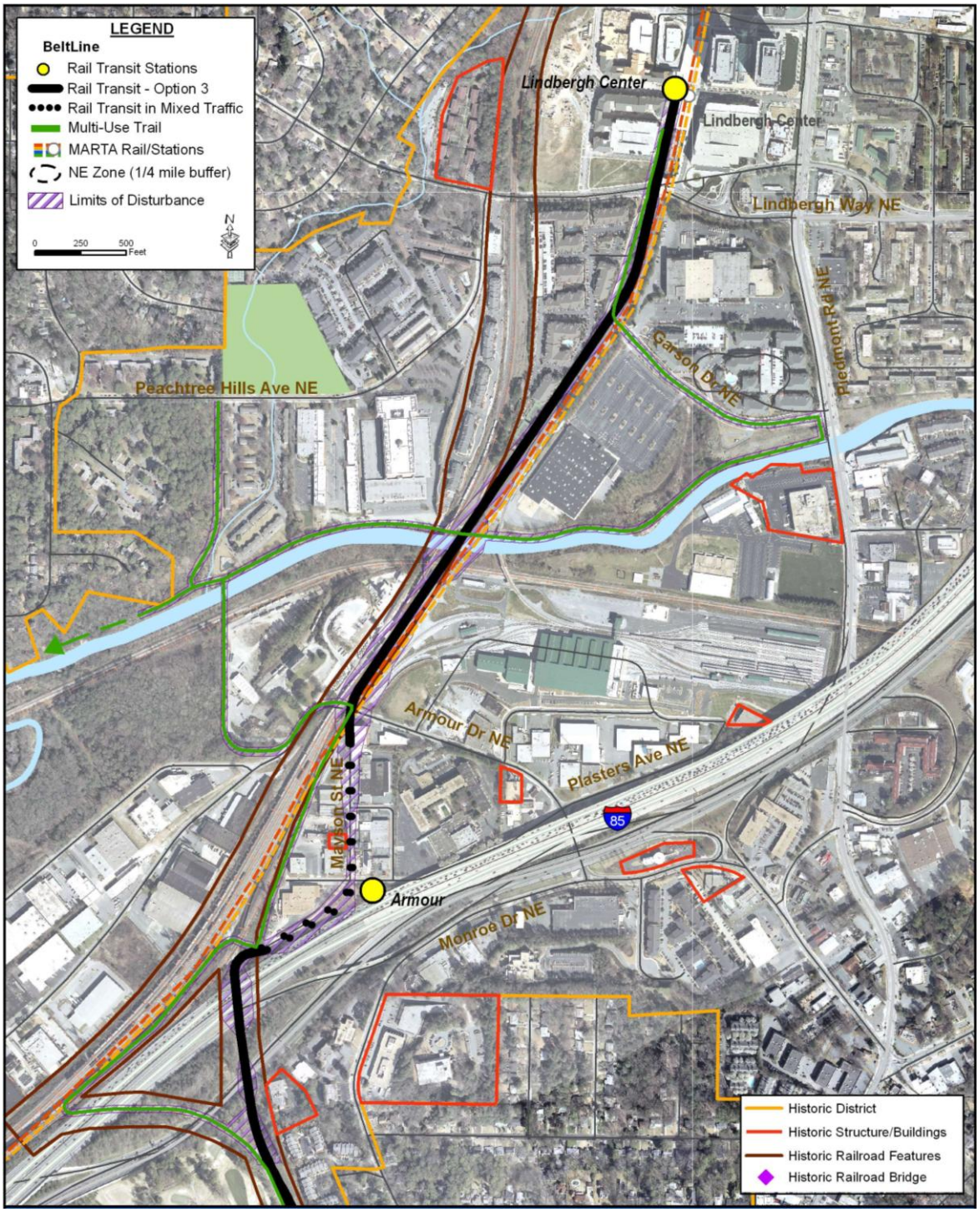


Figure 4-10: Historic Resources (Montgomery Ferry/Ansley Area)

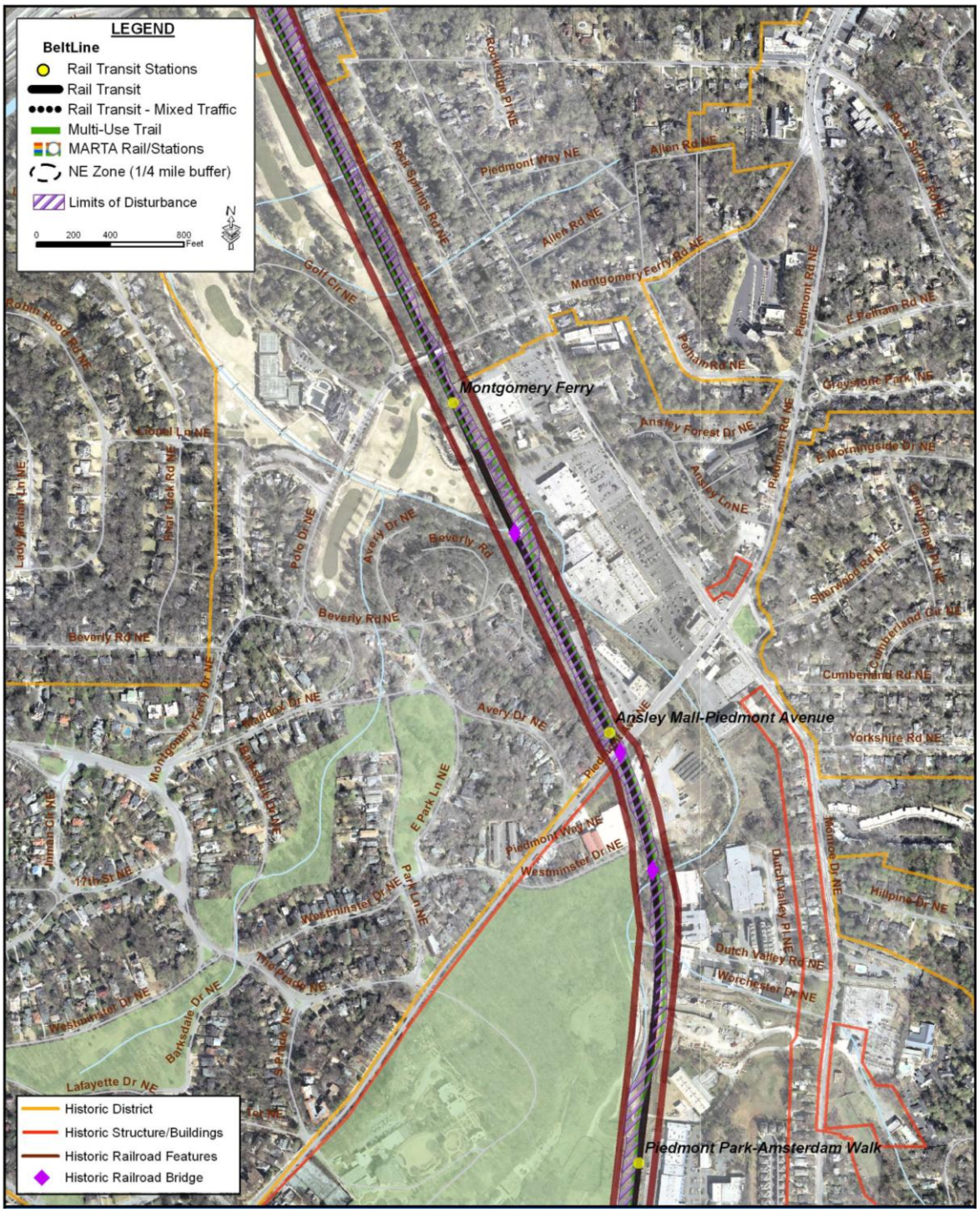


Figure 4-11: Historic Resources (Piedmont Park/Ponce de Leon Area)

Figure 4-12: Historic Resources (Freedom Parkway Area)

Figure 4-13: Historic Resources (Old Fourth Ward/Cabbagetown Area)

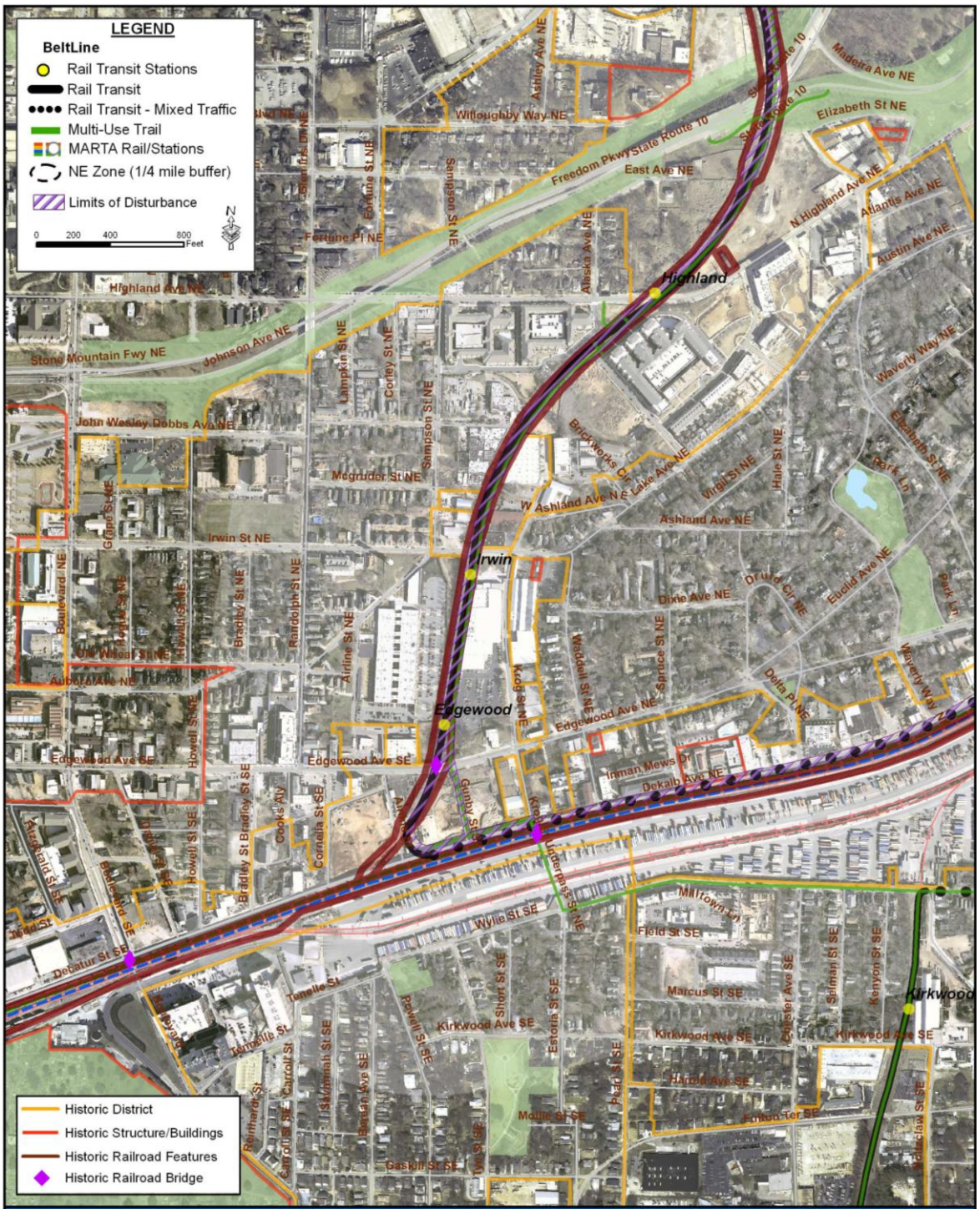
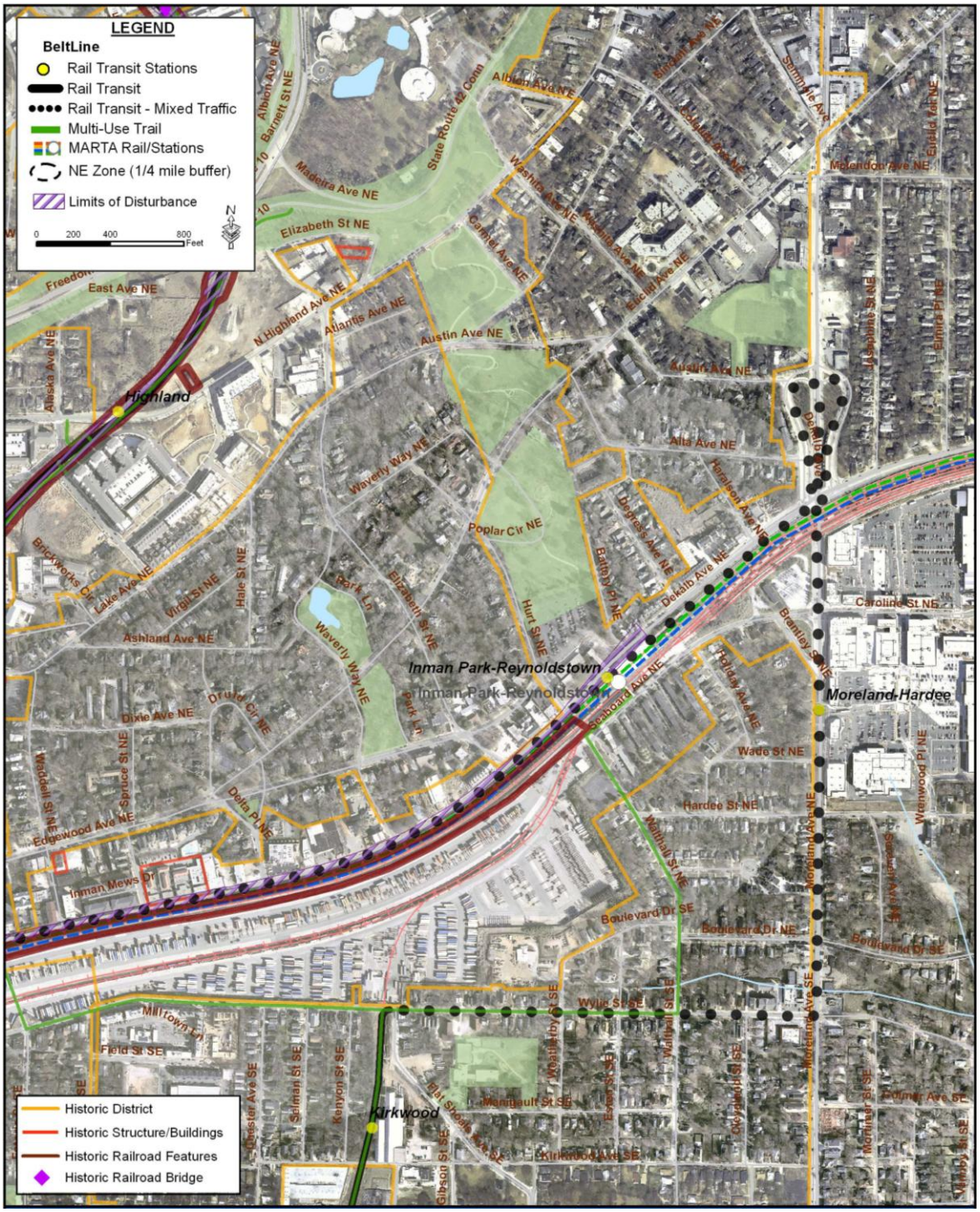


Figure 4-14: Historic Resources (Inman Park/Reynoldstown Area)



4.8.1 Description of Historic Properties

Ansley Park Historic District (Resource 1)

The Ansley Park Historic District (Figure 4-10) is an early 20th century suburban residential district situated between Peachtree Street NE and Piedmont Avenue NE. Developed between 1904 and 1913, with construction substantially completed by 1930, Ansley Park is historically and architecturally significant for its picturesque landscape design and development plan.

The EER assessment included an evaluation of this district for eligibility as a listing in the National Register under Criteria A and C. The district possesses a local level of significance in the areas of architecture, community planning and landscape architecture as a planned suburban community from the early 20th century.

The listed National Register boundary of the district comprises approximately 202.5 acres.

Piedmont Park (Resource 2)

Piedmont Park (Figure 4-10, Figure 4-11) is an early 20th century park bounded by Tenth Street NE, Piedmont Road NE, and the former Southern Railway (Atlanta Development Authority right-of-way). The area was formerly the driving grounds and race track of the Gentleman's Driving Club prior to its selection as the site of the 1895 Cotton States and International Exposition. In 1909, the City of Atlanta purchased the land for a park. At this time, the Olmsted Brothers, sons of Frederick Law Olmsted, Sr., designed the urban space utilizing the ideas of their father who consulted initially on developing landscape plans for the Exposition.

The EER assessment included an evaluation of this property for eligibility as a listing in the National Register under Criteria A and C. The property possesses a local level of significance in the areas of landscape architecture, urban planning and history as an urban park designed utilizing the principles of the nationally renowned landscape architect, Frederick Law Olmsted, Sr.

The listed National Register boundary of the property comprises approximately 185 acres.

Virginia-Highland Historic District (Resource 3)

The Virginia-Highland Historic District (Figure 4-11) is a late-19th to mid-20th century residential district situated between Ponce de Leon Avenue NE, Amsterdam Avenue NE, the former Southern Railway (Atlanta Development Authority right-of-way), and the Atlanta city limits. Developed between 1889 and 1955, the neighborhood incorporated the major planning characteristics of American suburbs in the early 20th century. Prominent local architects designed houses within the neighborhood. The district also includes a small historic commercial area, the 1923 Samuel Inman School, several churches and neighborhood parks.

The EER assessment included an evaluation of this district for eligibility as a listing in the National Register under Criteria A and C. The district possesses a local level of

significance in the areas of architecture, commerce, community planning and development, and landscape architecture as an intact 20th century suburban neighborhood.

The listed National Register boundary of the district comprises approximately 612 acres.

Martin Luther King, Jr., Historic District (Resource 4)

The Martin Luther King, Jr., Historic District (Figure 4-13) is a residential, commercial, institutional and industrial district north of DeKalb Avenue NE, south of Freedom Parkway NE, east of I-75/85, and west of the former Southern Railway (Atlanta Development Authority right-of-way). Spanning the period from c. 1853 – 1968, the district includes vernacular house, community landmark buildings, such as the David T. Howard School; and several industrial resources important to the development of the Auburn Avenue neighborhood, including the Atlantic/Southeastern Compress and Warehouse constructed in 1905 to store cotton.

The EER assessment included an evaluation of this district for eligibility as a listing in the National Register under Criteria A, B, and C. The district possesses a local and national level of significance in the areas of Ethnic Heritage: Black, Social History, Community Planning and Development and Architecture as a turn of the 20th century neighborhood that became a thriving African-American community where several key leaders of the black community, including Martin Luther King, Jr., resided.

The listed National Register boundary of the district comprises approximately 280.4 acres. An enlargement of the district boundaries in 2001 included parcels within the APE for the Northeast Zone.

Inman Park Historic District (Resource 5)

The Inman Park Historic District (Figure 4-13, Figure 4-14) is a primarily residential district east of downtown Atlanta. Developed in 1899, Inman Park was the first planned residential suburb in Atlanta and incorporated curvilinear streets and broad avenues following the natural topography of the area. Several commercial buildings and prominent community structures comprise the neighborhood, including the Inman Park School, the Inman Park Car Barn and the Inman Park Methodist Church as well as several small landscaped parks.

The EER assessment included an evaluation of this district for eligibility as a listing in the National Register under Criteria A and C. The district possesses a local level of significance in the areas of architecture, landscape architecture, community planning and development and transportation as a late 19th to mid-20th century residential suburb utilizing landscape plans and tenets of landscape gardener Joseph Forsyth Johnson and landscape architect Frederick Law Olmsted.

The listed National Register boundary of the district comprises approximately 135 acres.

Inman Park-Moreland Historic District (Resource 6)

The Inman Park-Moreland Historic District (Figure 4-14) is a primarily residential district east of downtown Atlanta. The late 19th to early 20th century neighborhood is comprised

houses wherein many of the city's political and business leaders resided; the commercial area of Little Five Points; and two historic schools, the Moreland School and the William A. Bass Junior High School and Gymnasium.

The EER assessment included an evaluation of this district for eligibility as a listing in the National Register under Criteria A, B, and C. The district possesses a local level of significance in the areas of architecture, community planning and development, commerce, education and local history as an intact turn-of-the-20th century residential district with commercial properties notable for its association with prominent Atlantans.

The listed National Register boundary of the district comprises approximately 85 acres.

Historic Railroad Resources of the Atlanta BeltLine Northeast Zone (Resource 7)

The Historic Railroad Resources of the Atlanta BeltLine Northeast Zone (Figure 4-7 through Figure 4-13) is a multiple property listing. This listing consists of the railroad belt lines and structures constructed on or adjacent to the former Southern Railway corridor from 1875 to 1960 and situated between DeKalb Avenue NE near Oakland Cemetery and Hulsey Yard northeasterly to Armour Yard north of I-85. Developed to interconnect the various railroads and freight yards that ringed the city, Atlanta's belt lines relieved rail congestion within the city, shifted rail cars at the various industrial complexes connected to the belt lines, and provided access to the city's passenger stations. Contributing resources to the Historic Railroad Resources are the remaining intact segments of the former single- and double-track system of the Southern Railway corridor, 13 bridge structures constructed between 1890 and 1954, an undated traffic signal device, a ca. 1911-1928 terminal building, and remaining extant masonry walls used to construct elevated sections of the line.

The EER assessment included an evaluation of this resource for eligibility as a listing in the National Register under Criteria A and C. The resource possesses local and state levels of significance in the areas of engineering, transportation, commerce, and industry as an important line that facilitated commerce and industrial development in the eastern half of the city of Atlanta from the late-19th century through the end of the 20th century. The remaining rail beds are a significant designed feature, as are the secondary features, inclusive of the bridges and terminal building, which are relatively intact and are good examples of their type.

The eligible National Register boundary of the Historic Railroad Resources includes the portion of the remaining Southern Railway corridor, associated secondary features within the former railroad ROW that are found within the project study area, and a separate proposed discontinuous boundary around the associated Terminal Building. The eligible boundary contains all National Register qualifying characteristics and features of this resource and includes the rail bed, bridges, building, and designed features.

Because the historic boundary of the Terminal Building is no longer intact and because there are no other features within the legal boundaries that contribute to the architectural significance of the property, the eligible National Register boundary consists of a visual boundary. The eligible boundary, consisting of approximately 0.15 acre, contains all National Register qualifying characteristics and features of the property and includes the building and the immediate surrounds.

Atlanta's Historic Apartment Complexes – 430 Lindbergh Drive NE (Resource 8)

430 Lindbergh Drive NE (Figure 4-7, Figure 4-8, or Figure 4-9) is a 1957 garden apartment complex. The development is comprised of 12 identical freestanding, two-story, rectangular, brick buildings. The complex is sited in a linear fashion with two rows of six buildings separated by a tree-lined, central paved walkway and grassed areas.

The EER assessment included an evaluation of this property for eligibility as a listing in the National Register under Criteria A and C. The property possesses a local level of significance in the areas of architecture, landscape architecture and community planning and development as a mid-20th century garden apartment complex within a landscaped setting constructed in a developing residential area and reflecting the scale and style of architecture of the adjoining residential neighborhood.

The eligible National Register boundary of the property corresponds to the legal property boundary and comprises approximately 4.1 acres. All significant and character defining features of the property are included within the legal boundary.

Peachtree Hills (Resource 9)

Peachtree Hills (Figure 4-7, Figure 4-8, or Figure 4-9) is a residential district bounded roughly by Peachtree Creek on the south and southwest, by Lindbergh Drive NE and Sharondale Court NE on the north, by Glenwood Road NE on the west, and by Sharondale Drive NE, Kinsey Court NE, and Peachtree Creek on the east. Peachtree Hills is comprised of three historic suburbs: Peachtree Hills Place, Peachtree Terrace, and Birch Wood. Developed between 1911 and 1958, the neighborhood is comprised of a variety of early- to mid-20th century house types and styles.

The EER assessment included an evaluation of this property for eligibility as a listing in the National Register under Criteria A and C. The property possesses a local level of significance in the areas of architecture, community planning and development and landscape architecture as an intact garden suburb that evolved over four decades and contains good and representative examples of early- to mid-20th century residential architecture.

Because the historic boundary is no longer intact and because there are no other significant or character defining features within the legal boundary that contribute to the architectural significance of the property, the eligible National Register boundary consists of a visual boundary. The eligible boundary, comprising approximately 147 acres, contains all National Register qualifying characteristics and features of the property and includes the houses, associated outbuildings and the immediate surrounds.

Orkin-Rollins Building (Resource 10)

The Orkin-Rollins Building (Figure 4-7, Figure 4-8, or Figure 4-9) is a three-story glass, concrete and steel symmetrical block building at 2170 Piedmont Road NE. Construction of the building was in 1962, in the New Formalism style.

The EER assessment included an evaluation of this property for eligibility as a listing in the National Register under Criteria A and C. The property represents a local level of significance in the areas of architecture, commerce and community planning and

development. The property is a mid-20th century commercial building in the New Formalism style and was the suburban headquarters of two major pest industries, one of which acquired the other through a leveraged buy-out, a type of business transaction that altered the development of American commerce.

The eligible National Register boundary of the property corresponds to the legal property boundary and comprises approximately 4.02 acres. All significant and character defining features of the property are included within the legal boundary.

441 Armour Drive (Resource 11)

441 Armour Drive NE (Figure 4-7, Figure 4-8, or Figure 4-9) is a large rectangular industrial/warehouse building with office space.

The EER assessment included an evaluation of this property for eligibility as a listing in the National Register under Criteria A and C. The property possesses a local level of significance in the area of architecture as a mid-century industrial/warehouse type building with combination office and warehouse facilities. Because there was no evidence that the property provided a unique service to the local community, that it was associated with any historic event, or that it was important to the development of the local area, it is not significant under Criterion A in the areas of industry or community planning and development.

The eligible National Register boundary of the property corresponds to the legal property boundary and comprises approximately 0.49 acre. All significant and character defining features of the property are included within the legal boundary.

2131 Old Plasters Bridge Road NE (Resource 12)

2131 Old Plasters Bridge Road NE (Figure 4-7, Figure 4-8, or Figure 4-9) is a warehouse building.

The EER assessment included an evaluation of this resource for eligibility as a listing in the National Register under Criteria A and C. The property possesses a local level of significance in the area of architecture as a mid-century industrial-warehouse type building with combination office and warehouse facilities. As there was no evidence that the property provided a unique service to the local community, that it was associated with any historic event, or that it was important to the development of the local area, it is not significant under Criterion A in the areas of commerce or community planning and development.

The eligible National Register boundary of the property corresponds to the legal property boundary and comprises approximately 0.33 acre. All significant and character defining features of the property are included within the legal boundary.

Mason Chapel Baptist Church/Masonic Lodge (Resource 13)

The Mason Chapel Baptist Church/Masonic Lodge (Figure 4-7, Figure 4-8, or Figure 4-9) is a combination church and lodge at 113 Mayson Avenue NE.

The EER assessment included an evaluation of this property for eligibility as a listing in the National Register under Criteria A and C. The property possesses a local level of significance in the areas of architecture, social history and community planning and development. The resource appears to be a unique combination of church and Masonic lodge for the local community and possesses significance in the area of architecture as a good and representative example of a front-gabled vernacular mid-20th century church.

The eligible National Register boundary of the property corresponds to the legal property boundary and comprises approximately 0.16 acre. All significant and character defining features of the property are included within the legal boundary.

1904 Monroe Drive NE (Resource 14)

1904 Monroe Drive NE (Figure 4-7, Figure 4-8, or Figure 4-9) is a low-rise office building of an unrecognized type in the International style.

The EER assessment included an evaluation of this property for eligibility as a listing in the National Register under Criterion C. The property possesses a local level of significance in the area of architecture as an intact example of an International style low-rise office building from the mid-20th century.

The eligible National Register boundary of the property corresponds to the legal property boundary and comprises approximately 0.49 acre. All significant and character defining features of the property are included within the legal boundary.

Piedmont Heights (Resource 15)

Piedmont Heights (Figure 4-7, Figure 4-8, or Figure 4-9; Figure 4-10) is a residential district roughly bounded by Montgomery Ferry Road NE to the south, the north ends of Kilburn and Lebanon Drives NE and Gotham Way NE, Piedmont Road NE to the east, and Flagler Avenue NE to the east. Piedmont Heights, dating from the 1880s to the 1960s, consists of three subdivisions and includes the original layouts for Piedmont Heights, the Ansley Park Annex, and a development planned by the Suburban Realty Company.

The EER assessment included an evaluation of this property for eligibility as a listing in the National Register under Criteria A and C. The property possesses a local level of significance in the areas of architecture and community planning and development for its collection of primarily early- to mid-20th century residences within suburban neighborhoods developed north of downtown Atlanta over several decades.

Because the historic boundary is no longer intact and because there are no other significant or character defining features within the legal boundary that contribute to the architectural significance of the property, the eligible National Register boundary consists of a visual boundary. The eligible boundary, comprising approximately 70 acres, contains all National Register qualifying characteristics and features of the district.

Pylant-Drewry-Greenwood Historic District (Resource 16)

The Pylant-Drewry-Greenwood Historic District (Figure 4-11) is district of five industrial buildings at 665 Pylant Street NE; 675 and 680 Drewry Street NE; and 675 and 686 Greenwood Avenue NE. The buildings are roughly bounded by Greenwood Avenue NE to the south, Pylant Street NE to the north, the former Southern Railway to the west, and Ponce de Leon Place NE to the east. Constructed between 1925 and 1949, the buildings include:

- two block-long attached warehouse-type buildings of sheet metal;
- a long rectangular brick building with a gable-roof clad in asphalt shingles and bands of metal-frame awning windows that served as a printing company;
- a one-story, L-shaped building serving as a dairy products manufacturer with concrete block and vinyl sidings;
- a brick building housing a variety of construction activities of which one was the namesake “B. Mifflin Hood Brick Co” as written on the façade; and
- a long one- to three-story trapezoid-shaped former industrial building with the original arched and flat-headed brick entrance and replacement stucco exterior.

The EER assessment included an evaluation of these properties for eligibility as a listing in the National Register under Criteria A and C. The properties possess a local level of significance in the areas of architecture, commerce, industry, and community planning and development as good examples of the prevailing building methods, materials, and styles of commercial and industrial buildings in the first half of the 20th century. The properties are also significant for their proximate location to the former Southern Railway indicating their relationship to the history and development of industry and commerce in Atlanta during this time.

Boundary areas for four NRHP-eligible properties in this district correspond to the legal property boundary and are as follows:

- 665 Pylant Street NE - approximately 1.70 acres;
- 675 Drewry Street NE - approximately 0.36 acre;
- 680 Drewry Street NE- approximately 0.25 acre; and
- 686 Greenwood Avenue NE - approximately 0.22 acre.

All significant and character defining features of the properties are included within the legal boundaries. Because the historic boundary of 675 Greenwood Avenue NE is no longer intact and because there are no other features within the legal boundaries that contribute to the architectural significance of the property, the proposed National Register boundary is a visual boundary, and contains approximately 0.76 acres. The proposed boundary contains all National Register qualifying characteristics and features of the district and includes the buildings and the immediate surrounds.

Ponce de Leon-Ralph McGill District (Resource 17)

The Ponce de Leon-Ralph McGill Historic District (Figure 4-12) dates from the early-to-mid-20th century and contains twenty contributing industrial and commercial buildings bounded roughly by Ralph McGill Boulevard NE (formerly Forrest Road) to the south, Ponce de Leon Avenue NE to the north, Glen Iris Drive NE to the west, and the Southern Railway to the east. Six National Register listed properties within this district include:

- Ford Motor Company (1914),
- Troy Peerless Laundry Building (1928),
- Southern Dairies (1935),
- Empire Manufacturing (1939),
- National NuGrape Company (1937), and
- Western Electric (1939-41).

Fourteen National Register eligible properties within this district include the following:

- Excelsior Mill (c. 1901);
- 712 Ponce de Leon Avenue NE (1909 and 1925);
- Sears, Roebuck and Company building (1926);
- 729 Ponce de Leon Place NE (1940);
- 730 Ponce de Leon Place NE (1945);
- 740 Ponce de Leon Place NE (1945);
- 750 Ponce de Leon Place NE (1945);
- 710 Ponce de Leon Avenue NE (1945);
- American Sprinkler Corporation of America building (1949);
- National Linen Company (1954);
- 750 Ralph McGill Boulevard NE (1949);
- 591 Somerset Terrace NE (1955);
- 580 Somerset Terrace NE (1955); and
- 723 Ralph McGill Boulevard NE (c. 1940), formerly the Akers Motor Line Building.

The EER assessment included an evaluation of this district for eligibility as a listing in the National Register under Criteria A and C. The properties possess a local level of significance in the areas of architecture, engineering, and industry and are comprised of largely intact and good examples of the prevailing building methods, materials, and styles of the different decades of the first half of the 20th century. Collectively, they clearly illustrate the changes in commercial and industrial design throughout this period and the development of industry in the Atlanta area during the first half of the 20th century.

The proposed National Register boundary for the Ponce de Leon- Ralph McGill Historic District is a discontiguous boundary that is comprised of the National Register boundaries of the 6 listed properties and the legal property boundaries of 14 eligible properties.

Krog Street-Southern Railway Historic District (Resource 18)

The Krog Street-Southern Railway Historic District (Figure 4-13) is comprised of nine commercial and industrial buildings situated adjacent to the former Southern Railway corridor and Krog Street NE, in an area that extends from north of Irwin Avenue NE south to Edgewood Avenue NE. Constructed between 1890 and 1955, the buildings include:

- 154 Krog Street NE(1890)
- 130 Krog Street NE (1952)
- 99 Krog Street NE (c. 1932-1950), also formerly of the Atlanta Stove Works
- 700 Lake Avenue NE (1940)
- 151 Sampson Street NE (1950) (a double-arched Quonset Hut)
- 660 Edgewood Avenue NE (1957)
- 710 DeKalb Avenue NE (1935)
- 716 Edgewood Avenue NE (1920)
- 724 Edgewood Avenue NE (1920)

The EER assessment included an evaluation of these resources for eligibility as a listing in the National Register under Criteria A and C. The properties possess a local level of significance in the areas of architecture, commerce, industry and community planning and development. These nine buildings retain original materials and architectural features and are good, representative examples of late-19th to mid-20th century commercial and industrial buildings that collectively convey their relationship to the history and development of the city that took advantage of proximity to the rail line during this period.

Inman Motor Works (Resource 19)

The Inman Motor Works (Figure 4-13, Figure 4-14) is comprised of four industrial buildings at 820 and 834 DeKalb Avenue NE.

The EER assessment included an evaluation of this property for eligibility as a listing in the National Register under Criteria A and C. The property possesses a local level of significance in the areas of architecture, industry and community planning and development. The complex of buildings gives evidence to a substantial mid-20th century business within a mixed industrial/residential district of Atlanta.

Because the historic boundary is no longer intact and because there are no other significant or character defining features within the legal boundary that contribute to the architectural significance of the property, the eligible National Register boundary consists of a visual boundary. The eligible boundary, comprising approximately 1.64 acres,

contains all National Register qualifying characteristics and features of the property and includes the buildings and the immediate surrounds.

4.8.2 Effects to Historic Resources

The Proposed State Action involves the disturbance of land within the BeltLine Corridor Northeast Zone for the construction of a fixed rail transit guideway and multi-use trails. Land disturbance is likely to include clearing, grading, or excavating of land owned by either MARTA or the Atlanta Development Authority.

There are 19 listed or eligible historic properties within the APE of the proposed action. A summary of anticipated adverse effects to the resources resulting from the proposed action follows. These findings are pending concurrence with the SHPO, as coordination is ongoing.

There would be no atmospheric effect to these resources resulting from project implementation. The proposed project is consistent with the State Implementation Plan for air quality in the region.

Pending SHPO concurrence with the assessment of effects, No Adverse Effect findings are anticipated for the following resources:

- Ansley Park Historic District (Resource 1)
- Piedmont Park (Resource 2)
- Virginia-Highland Historic District (Resource 3)
- Martin Luther King, Jr. Historic District (Resource 4)
- Inman Park Historic District (Resource 5)
- Inman Park-Moreland Historic District (Resource 6)
- 430 Lindbergh Drive NE - Atlanta's Apartment Complexes (Resource 8)
- Peachtree Hills (Resource 9)
- 441 Armour Drive NE (Resource 11)
- 2131 Old Plasters Bridge Road NE (Resource 12)
- Mason Chapel Baptist Church/Masonic Lodge (Resource 13)
- 1904 Monroe Drive NE (Resource 14)
- Piedmont Heights (Resource 15)
- Pylant-Drewry-Greenwood Historic District (Resource 16)
- Ponce de Leon-Ralph McGill Historic District (Resource 17)
- Krog Street-Southern Railway Historic District (Resource 18)
- Inman Motor Works (Resource 19)

Additionally, a conditional No Adverse Effect finding is anticipated for one historic resource.

Historic Railroad Resources of the Atlanta BeltLine Northeast Zone (Resource 7)

Pending SHPO concurrence, this conditional finding relates to the relocation or modification of bridge features to support the BeltLine Corridor right-of-way and access to trails and station areas. BeltLine Corridor design guidelines will incorporate strategies to preserve-in-place and re-use features and materials contributing to the historic character and/or use of these structures. In addition, where possible, other features of the Historic Railroads, including the railbed, other bridge structures, extant masonry walls, the terminal building, and the signal device, will remain intact.

Finally, an adverse effect finding is possible for one historic resource.

Orkin-Rollins Building (Resource 10)

Pending the SHPO finding, an adverse effect is anticipated for this resource under Transit and Multi-Use Trail Option 2, resulting from the proposed action crossing over and above the pedestrian entrance to the resource at Piedmont Road NE. No adverse effect is anticipated as a result of Option 1/1A or Option 3.

4.9 Archaeological Resources

The EER assessment included a Phase I archaeological survey of the Northeast Zone of the BeltLine Corridor. Consultation of the state archaeological site files at the University of Georgia and existing survey reports resulted in the location of previously identified archaeological sites within the APE. Further, reviews of topographic maps and aerial photography resulted in the identification of areas with high potential for archaeological sites within the APE. A review of the Georgia Archaeological Site Files at the University of Georgia in Athens showed that eight archaeological sites are within a 1-kilometer (0.62 mile) radius of the project corridor. The proposed action would have no effect on seven of these sites since they are outside the APE of the present undertaking.

The location of one previously identified archaeological site, 9FU77 (Battle of Atlanta), is in or adjacent to the proposed project corridor. Application of NRHP significance Criterion A (association with events that have significantly contributed to the broad patterns of history) and Criterion D (ability to yield information significant to prehistory or history) resulted in a recommendation of eligibility for this site.

The current investigation identified one previously unrecorded archaeological resource, 9FU549 (masonry wall remnant of former Atlanta Stove Works, at Krog Street NE and Irwin Street NE). A recommendation that this site is not eligible for the NRHP results from its limited potential to yield additional significant information. Also identified during the current undertaking were two isolated finds. Isolated Find 1 is a single stoneware sherd and Isolated Find 2 is a prehistoric quartz thinning flake. A recommendation that the isolated finds are not eligible for the NRHP results from their low research potential.

As a result of the urbanized nature of the proposed corridor, archaeological surveying in specific areas of the APE was inconclusive. Investigation could not occur for some paved locations, including areas near 9FU77, resulting from the limitations of manual Phase I survey methods. Documentary evidence indicates a high probability of Civil War remains in this area, which may be in a preserved state beneath urban fill. Further archaeological testing at 9FU77 would be necessary if the project design impacts potentially preserved

portions of the site. Additionally, the area near Isolated Find 2 contained a wide broadcast of modern debris, which hampered efforts to survey that location for Civil War remains believed to be in the vicinity. While Isolated Find 2 holds little research value on its own, it indicates the area exhibits little disturbance below the modern humic zone (the organic soil layer derived from decomposition of plant or animal matter). Based on historical research, further investigation would be necessary if the proposed action extends into relatively undisturbed portions of the area.

4.10 Parks/Recreation

Fourteen parks/recreational resources are within the study area for the Northeast Zone. Among these resources, ten of these parks are public park resources, two of these parks are under private ownership, and two are planned parks. Table 4-5 below lists and describes these park and recreation resources within the study area for the proposed action. Figure 4-15 through Figure 4-22 identify park and recreation resources near the Northeast Zone study area.

Based on a preliminary assessment of the transit and trails alignment provided to date, seven of the park resources near the proposed project are well outside the LOD for the proposed transit and trail alignments. The following parks would not likely experience any effects:

- Smith Park;
- McClatchey Park;
- Ansley Park;
- Cabbagetown Park;
- Inman Park;
- Springvale Park; and
- Lang Carson Park

The remaining seven park resources are immediately adjacent to the proposed right-of-way for the proposed project. These resources include:

- Peachtree Hills Park;
- Brookwood Hills Conservation Easement;
- Ansley Golf Club;
- Piedmont Park;
- (Planned) Piedmont Park Expansion Areas;

Table 4-5: Park and Recreation Resources

Park[1]	Location/Description	Size (acres)	Impact
Peachtree Hills Park[2]	• Neighborhood park at 308 Peachtree Hills Avenue NE. • Offers a gym, softball and soccer fields, tennis courts, a playground, and a picnic area. • Recently undergoing renovations by local area residents.	7.20	No impact
Brookwood Hills Conservation Easement	• Private easement between Armour Drive NE and Peachtree Creek . • Brookwood Hills Community Club is private owner. • Has no public access.	47.80	No impact
Ansley Golf Club	• Private golf course at 196 Montgomery Ferry Drive NE.	63.30	Potential proximity impacts as a result of visual and vibration impacts
McClatchey Park	• Neighborhood park at Avery Drive/Westminster Drive NE.	5.00	No impact
Smith Park	• Garden park at 1571 Piedmont Avenue NE / 1547 Monroe Drive.	0.41	No impact
Ansley Park	• Neighborhood park at Maddox Drive / E. Park Lane NE.	6.11	No impact
Piedmont Park[3]	• Regional park in the Midtown area at 400 Park Drive NE. • Created in 1887 and described by many as the "Central Park" of Atlanta. • Includes landscape design by noted historical figures Joseph Forsyth Johnson and the sons of Frederick Law Olmsted. • Often considered the focal point of the Midtown community. • Home to various annual celebrations and events.	185.00	Potential proximity impacts as a result of visual and vibration impacts; loss of parking at Park Tavern
Proposed Piedmont Park Expansion[3]	• Includes North Piedmont Park, Piedmont Commons, and Piedmont Gardens.	53.00	Potential proximity impacts as a result of visual and vibration impacts
Historic Fourth Ward Park at North Avenue	• Planned public park in Old Fourth Ward neighborhood. • Planned primarily as a passive park with lakes, open meadows and a system of multi-use trails.	40.00	Potential proximity impacts as a result of visual and vibration impacts

Freedom Park[4]	• Regional park at North Avenue NE/Moreland Avenue. • Transportation right-of-way previously purchased by the Georgia Department of Transportation (GDOT) for the development of a new interchange. • GDOT cancelled the interchange project because of public opposition, and the City of Atlanta transformed the space into a public park. • In the Poncey-Highlands, Old Fourth Ward, Inman Park, and Candler Park neighborhoods. • Popular among joggers, bicyclists, and dog-walkers.	188.59	No impact
Cabbagetown Park[5]	• Neighborhood park at 701 Kirkwood Avenue SE. • City of Atlanta designated this old school property was as greenspace in 1999. • Includes a community center.	3.10	No impact
Inman Park	• Garden park at Euclid Avenue/Edgewood Avenue NE	0.28	No impact
Springvale Park	• Neighborhood park at Euclid Avenue/Waverly Way NE. • Created in 1903.	4.60	No impact
Lang-Carson Park	• Neighborhood park at 100 Flat Shoals Avenue SE. • Includes a community center, basketball and tennis courts, a meeting room, weight room, arts and crafts room, aerobics studio, and exercise room.	3.24	No impact

1 City of Atlanta Office of Parks http://www.atlantaga.gov/government/ (accessed June 2008)

2 Peachtree Hills Park Civic Association http://www.peachtree-hills.org/facility_list.asp (accessed June 2008)

3 Piedmont Park Conservancy http://www.piedmontpark.org/ (accessed June 2008)

4 Freedom Park http://www.freedompark.org/ (accessed June 2008)

5 Cabbagetown Initiative Community Development Organization http://www.cabbagetowninitiative.org/ (accessed June 2008)

Figure 4-15: Parks and Recreation (Armour/Lindbergh Area, Option 1 and Option 1A)

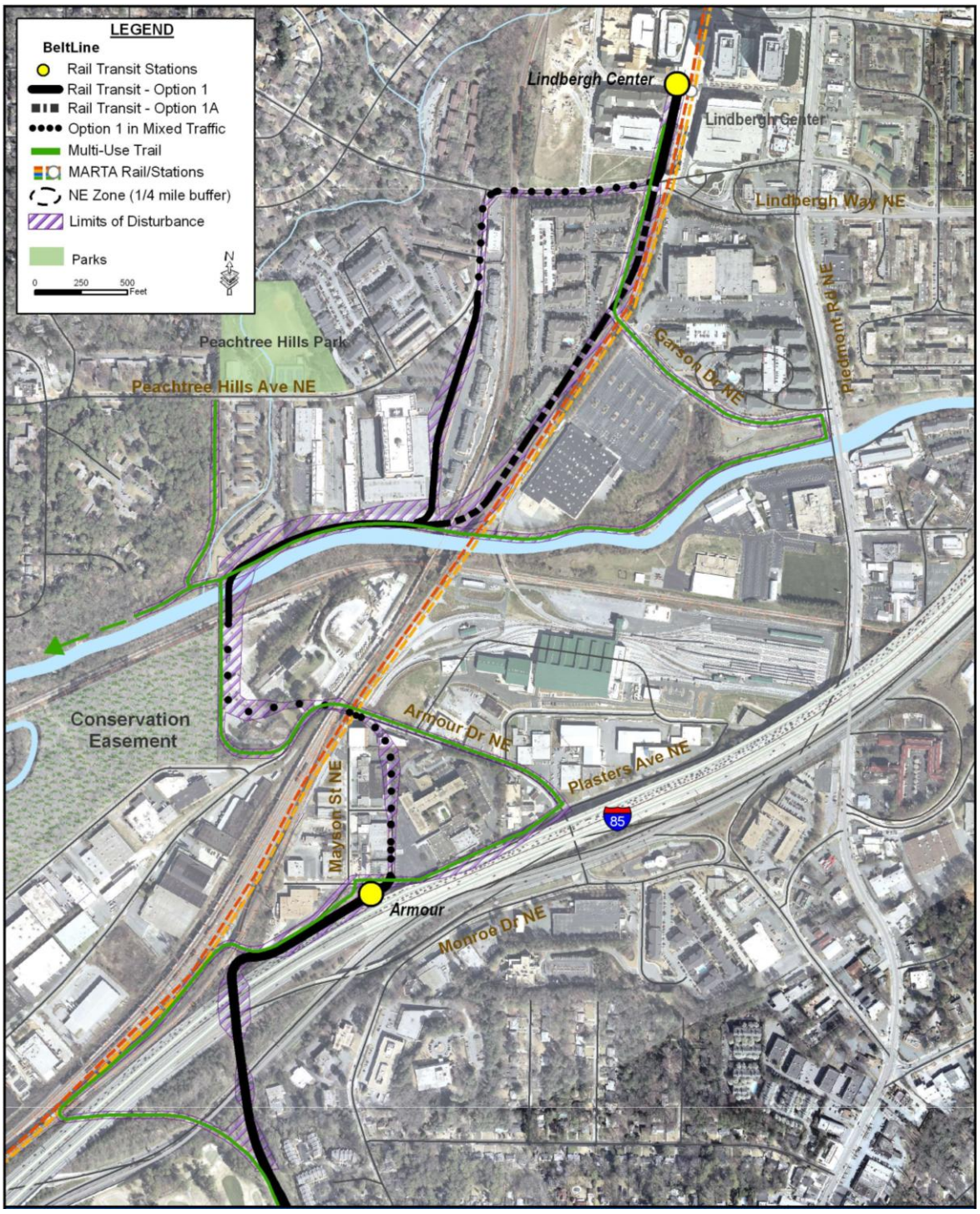


Figure 4-16: Parks and Recreation (Armour/Lindbergh Area, Option 2)

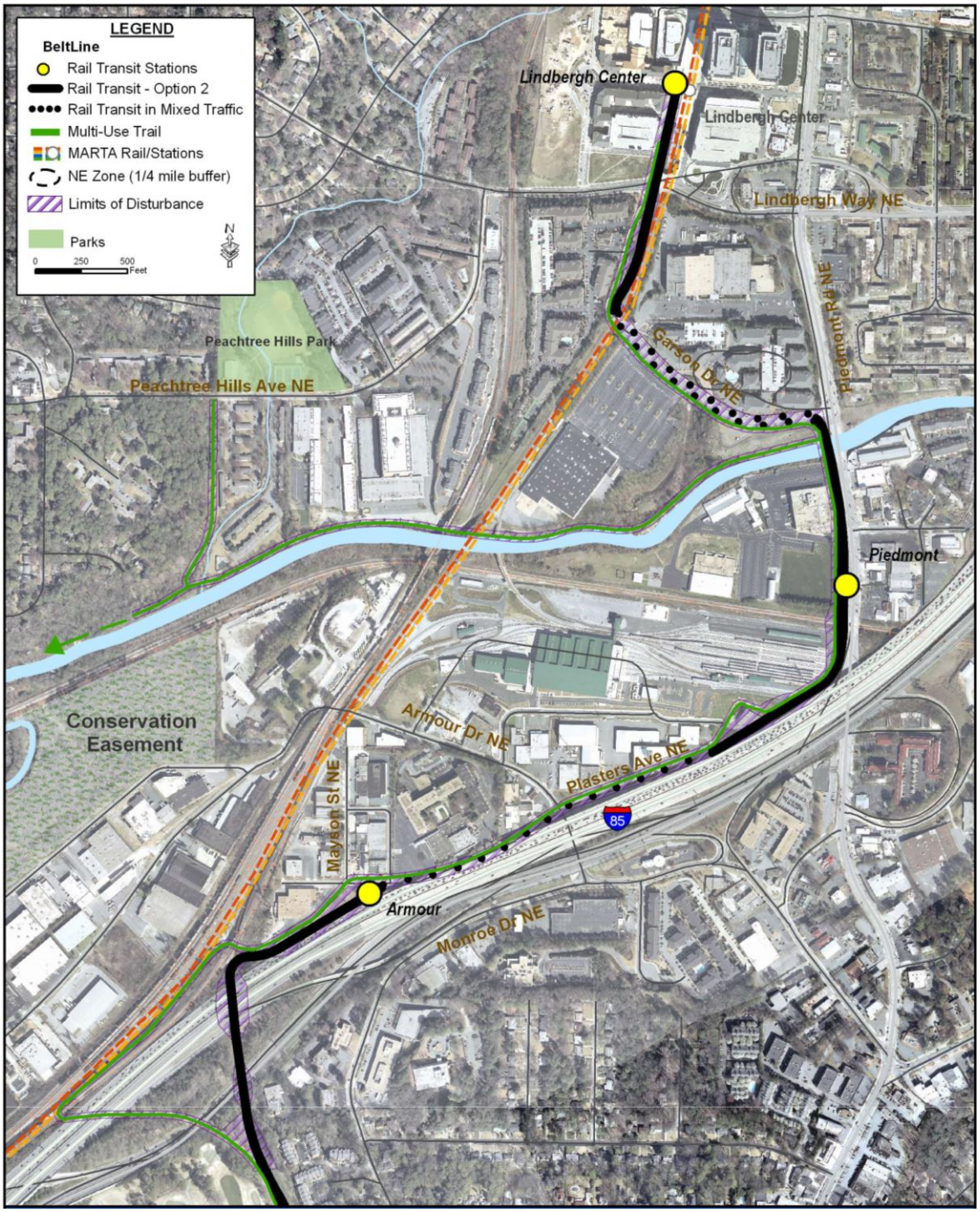


Figure 4-17: Parks and Recreation (Armour/Lindbergh Area, Option 3)

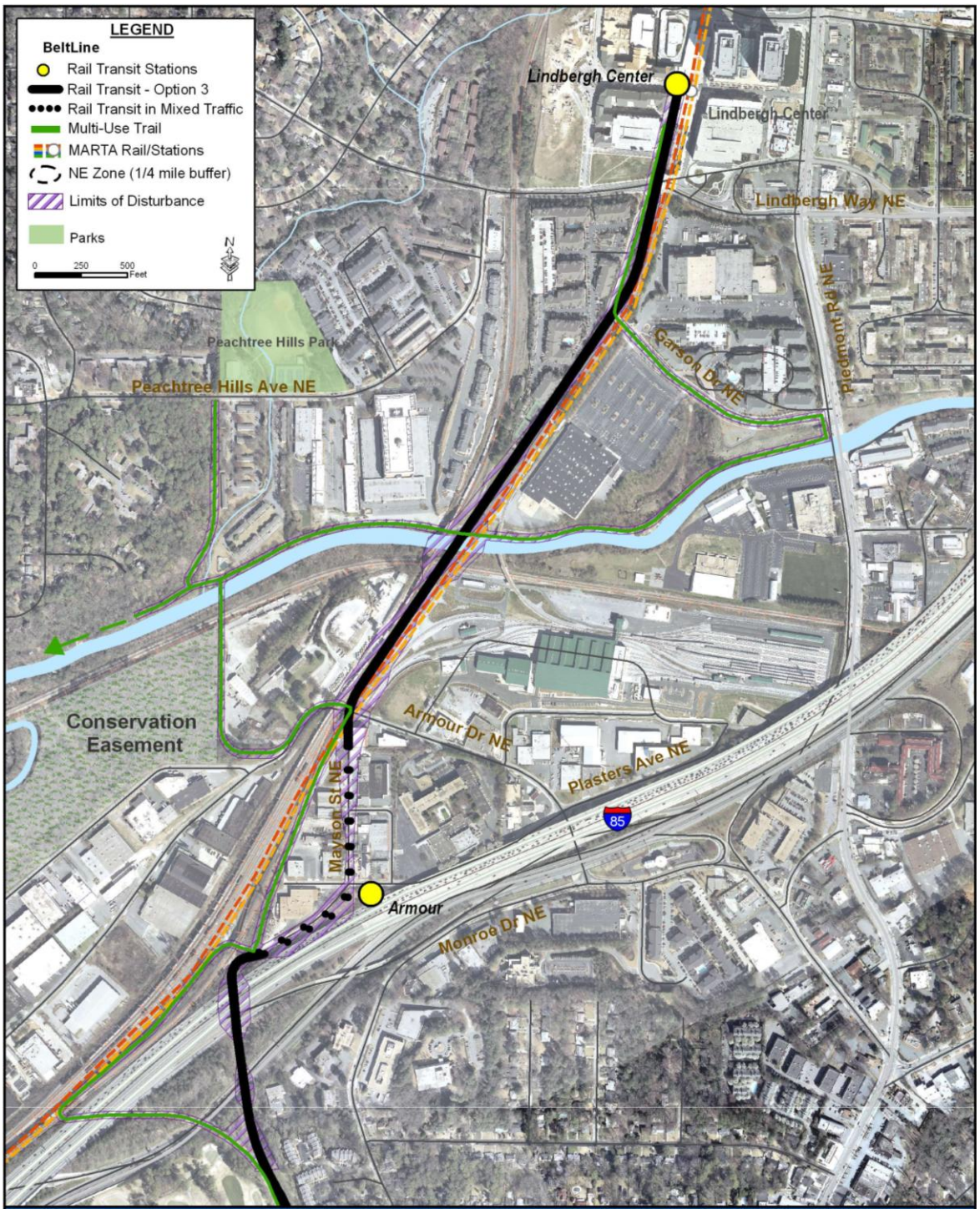


Figure 4-18: Parks and Recreation (Montgomery Ferry/Ansley Area)

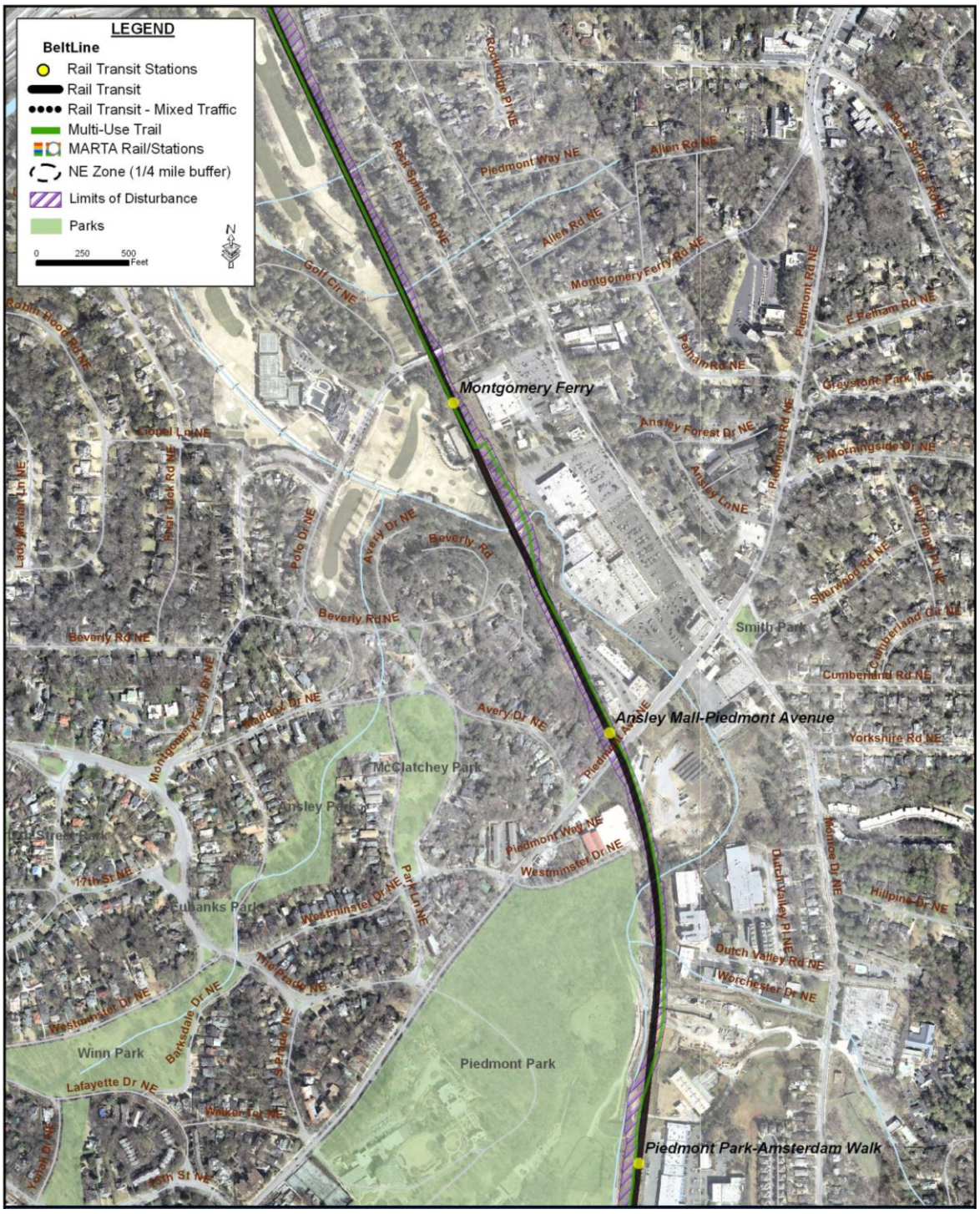


Figure 4-19: Parks and Recreation (Piedmont Park Area)

Figure 4-20: Parks and Recreation (Freedom Parkway Area)

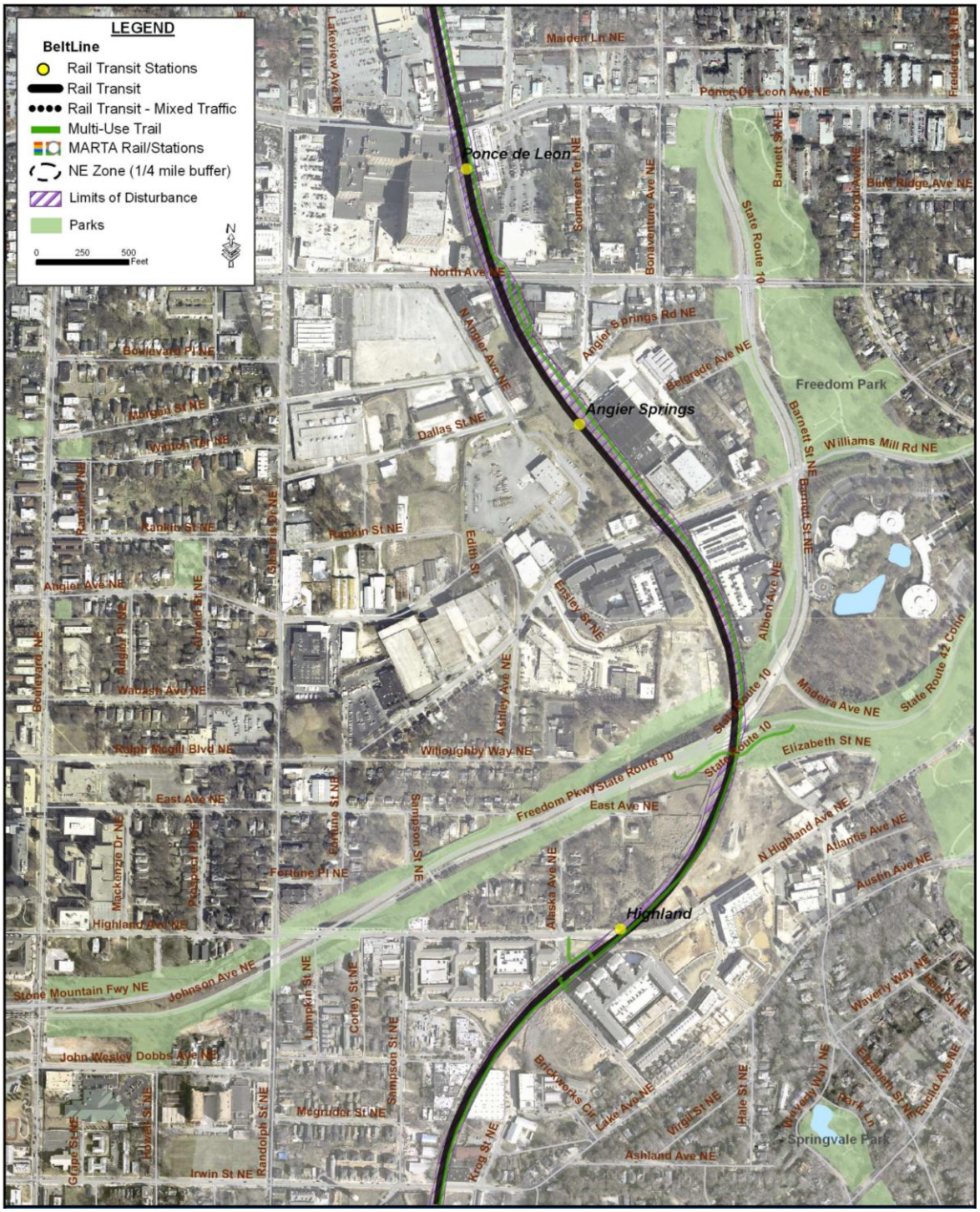
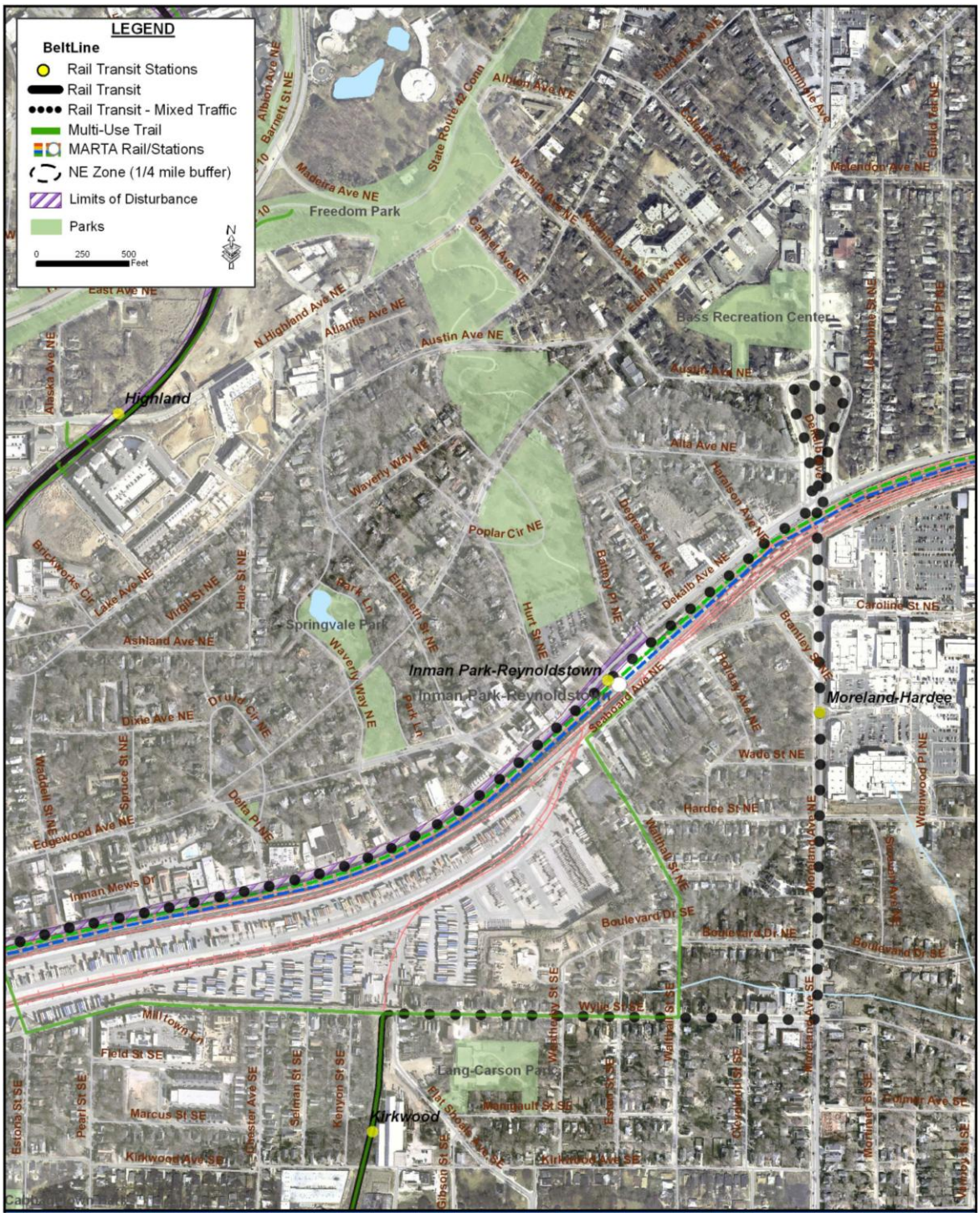


Figure 4-21: Parks and Recreation (Old Fourth Ward/Cabbagetown Area)

Figure 4-22: Parks and Recreation (Inman Park/Reynoldstown Area)



- (Planned) Historic Fourth Ward Park at North Avenue; and
- Freedom Park

While the proposed project does not pose direct impacts on the seven park resources adjacent to the ROW, four park resources may experience proximity impacts because of visual and vibration effects resulting from the project. These resources include Ansley Golf Club, Piedmont Park, planned Piedmont Park expansion areas, and the planned Historic Fourth Ward Park at North Avenue. These park resources are found south of I-85, where there is a single proposed transit and trail alignment under the Build Alternative. Descriptions of potential impacts for these resources follow.

Ansley Golf Club

South of I-85, the proposed alignment would run parallel to the Ansley Golf Club, a private establishment. The proposed alignment of the trails and transit would not require the use of any of the property owned by the Ansley Golf Club. The golf club would likely experience some visual and aesthetic effects and may experience some vibration effects.

Piedmont Park and Planned Expansion Areas

As the proposed transit and trails alignment continues south, it runs parallel to Piedmont Park. Piedmont Park is a regional park and a historic resource. The proposed alignment would not use any park property within Piedmont Park. The proposed alignment runs immediately east of and adjacent to the majority of the park. Piedmont Park is also a historic resource, as noted in Section 4.8.1. Coordination with staff at Piedmont Park indicates that a new access road to the Atlanta Botanical Garden is being designed, which is on the Piedmont Park property. The proposed alignment would intersect at-grade with this access road. During the more detailed design phases of the project, MARTA and ABI will identify specific features to enhance safety in the Piedmont Park area.

The planned park expansions of Piedmont Park would be adjacent to the proposed transit and trails alignment. It is likely that where the expansion areas abut the alignment, the potential for proximity effects could occur. Potential effects may include changes to the visual and aesthetic character and the potential for vibration impacts.

A review of Land and Water Conservation Fund (LWCF) grants shows that Piedmont Park has been a recipient of LWCF grants. While the proposed action does not include Piedmont Park ROW, if the proposed project alignment changes in the future to include such ROW, any portions of the park purchased, developed, or enhanced with LWCF funds would receive special protection, including the possible requirement to replace impacted portions in-kind. MARTA and ABI would continue to coordinate with the City of Atlanta and Piedmont Park Conservancy to determine which portions of the park have received LWCF grants.

Given the close location of the transit alignment in relation to the park, there may be proximity effects associated with transit operations. It is likely that Piedmont Park would experience impacts as a result of vibration. In addition to the potential for vibration

impacts, introducing BeltLine transit service in the area would potentially change the visual and aesthetic character of the park property near the proposed alignment. The addition of the Virginia-Monroe Station near the Park Tavern and the intersection of 10th Street NE and Monroe Drive NE would also have some effect of the visual character of the area resulting from the addition of new visual elements. However, the proposed station, transit, and trails would benefit Piedmont Park by providing access to a greater number of area residents.

The existing Atlanta Development Authority ROW is adjacent to the Park Tavern, which currently utilizes the underutilized ROW for vehicle parking. The proposed alignments could impact parking availability for the Park Tavern, as this is the only apparent option near the establishment. As part of the detailed design process, ABI and MARTA will coordinate with the City of Atlanta and the Piedmont Park Conservancy to identify alternative parking options for Park Tavern, in coordination with active City roadway realignment and park-area expansion and transportation access plans.

Historic Fourth Ward Park at North Avenue (Planned Park)

Based on a review of the ABI subarea master plans, the Historic Fourth Ward Park at North Avenue is planned within the Northeast Zone study area. The southern portion of this park would abut the proposed alignment. Potential impacts would likely result from proximity effects such as alterations to the visual and aesthetic character and the potential for vibration impacts.

4.11 Energy Supplies

The expected source of energy for the BeltLine is electricity provided by Georgia Power. However, the qualitative findings of this assessment can apply to either electricity or diesel fuel use, the two typical sources of energy for LRT or Modern Streetcar transit systems. Energy would be necessary to power the BeltLine transit equipment, as well as station facilities (i.e., lighting, fare boxes, etc.) and maintenance yard operations. Of these sources, the transit equipment would be the highest source of energy need.

This EER assessment evaluated potential energy use by the BeltLine as a function of forecast ridership and savings in vehicle miles traveled by personal car. The 2007 MARTA transit alternatives analysis forecast a ridership rate on the BeltLine of 26.4 million boardings annually and an annual travel savings of 113,000 vehicle miles.[1] Using the industry standard for automobile energy use, 6,233 British Thermal Units (BTUs) per vehicle mile,[2] the energy savings by diverting personal car drivers to BeltLine riders would be up to approximately 704 million BTUs annually.

Transit typically uses 12 times more energy, or BTUs, than an automobile based on an average energy-efficiency of approximately 70,000 BTU per vehicle mile.[3] However,

[1] MARTA, January 2007. *BeltLine Inner Core Alternatives Analysis: Detailed Screening Results*.

[2] Federal Transit Administration, July 1999. *Technical Guidance on Section 5309 New Starts Criteria.*

[3] Oak Ridge National Laboratory, Center for Transportation Analysis. *Transportation Energy Data Book: 2006-2007.*

each rider on an LRT or streetcar vehicle uses approximately 8 percent of the energy that a person in an automobile uses. Therefore, the energy efficiency or the amount of BTUs saved by a transit rider is significant in comparison to that of a single driver. As a result, although BeltLine operations would be a new energy generator, the effect of the project on overall energy supply and use would be a substantial savings. Other savings, such as reduced congestion and delays on roadways in the Atlanta region, are additional energy benefits of the BeltLine.

Upon a decision to proceed with the proposed action, MARTA and ABI would coordinate with Georgia Power in relation to its energy needs to operate the BeltLine. Georgia Power operates under its proactive plan to expand its energy sources to meet the growing demand in the Atlanta region. Complementing this plan is a series of strategies Georgia Power is actively pursuing to more efficiently operate their facilities and incorporate sustainable technologies. This EER assessment anticipates that adequate power would be available to serve the BeltLine.

The Northeast Zone of the BeltLine Corridor contains a number of energy transmission and distribution lines owned and operated by Georgia Power and other energy utilities. Project design efforts would strive to avoid or minimize impacts to these facilities. Where impacts are unavoidable, MARTA would coordinate with the owning utility regarding relocation or other appropriate mitigative action. This EER assessment anticipates that construction of the proposed action would not interrupt energy supplies to the Atlanta region.

4.12 Hazardous Materials

This EER assessment included an inventory of hazardous materials/contaminated sites and potential brownfield locations for the proposed transit and multi-use trail alignments of the BeltLine Corridor Northeast Zone. The investigation included both a review of available federal and state databases and reports, and confirmatory site reconnaissance to ascertain the current conditions of the alignment and recognized environmental conditions that may exist along the proposed transit and trail alignments.

There are 214 sites within a 0.25-mile radius of the proposed transit and trail alignments of the Northeast Zone. Of that number, the database search confirmed 61 sites, or “recognized environmental conditions” (RECs), to be within or immediately adjacent to the 200-foot buffer of the proposed alignments. Figure 4-23 through Figure 4-30 illustrate the hazardous materials sites in relation to the Northeast Zone.

The proposed maintenance yard location currently includes warehouses and other one- and two-story buildings. Some of these locations have had reported releases (expenditures of hazardous substances) and were reported to generate hazardous waste. The development of the maintenance yard at this location would require prior determination of any potential spills or releases produced from historic or current operations at these properties and/or to determine the presence of any underground storage tanks (USTs) at these facilities prior to any demolition of the properties. In addition, should demolition of the buildings be necessary, the identification and abatement of asbestos containing materials (ACM) shall be in accordance with all state, local and federal regulations. The Atlanta Development Authority (via ABI) and MARTA would follow this programmatic protocol for any property acquisition and/or wherever

Figure 4-23: Hazardous Materials Sites (Armour/Lindbergh Area, Option 1 and 1A)

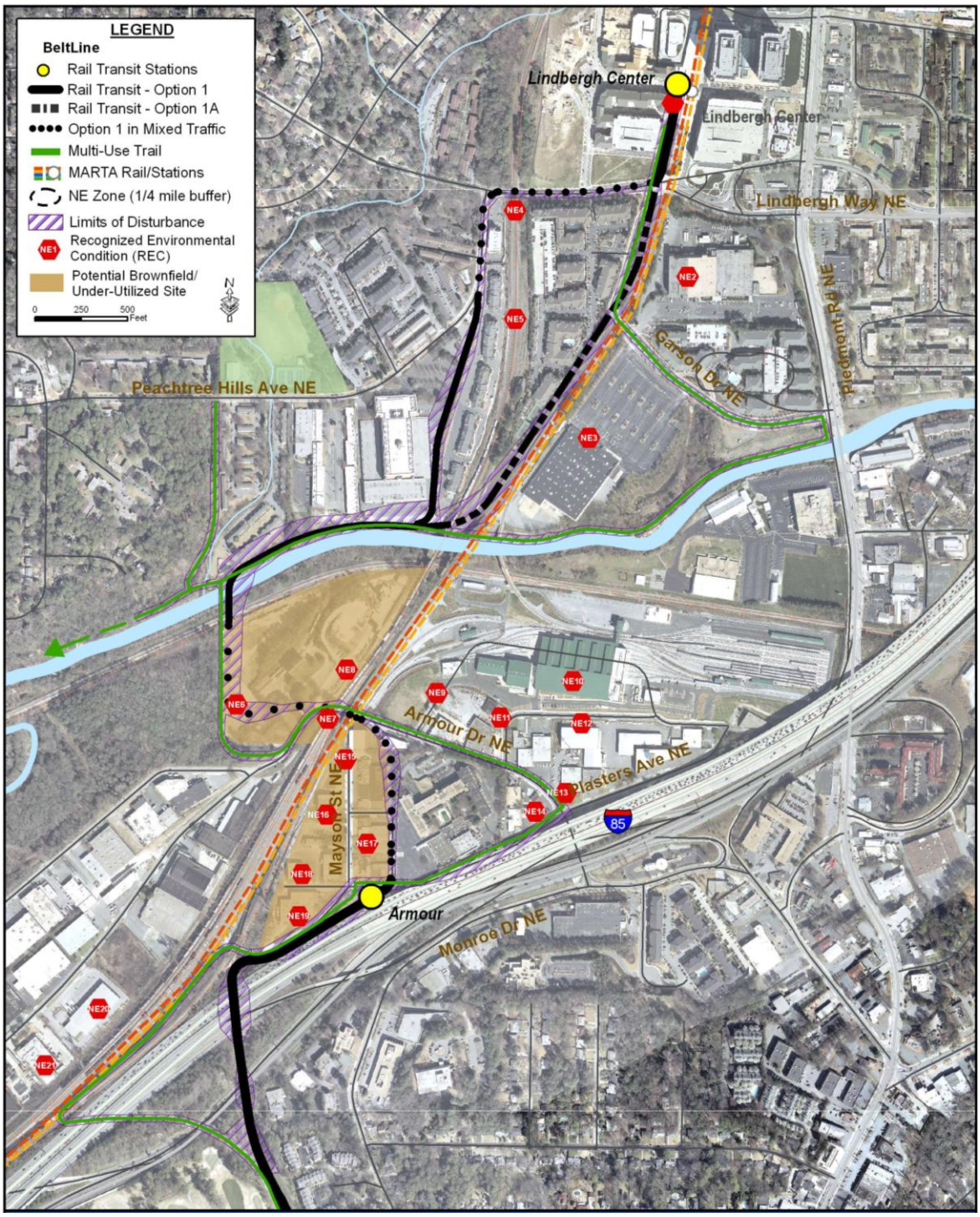


Figure 4-24: Hazardous Materials Sites (Armour/Lindbergh Area, Option 2)

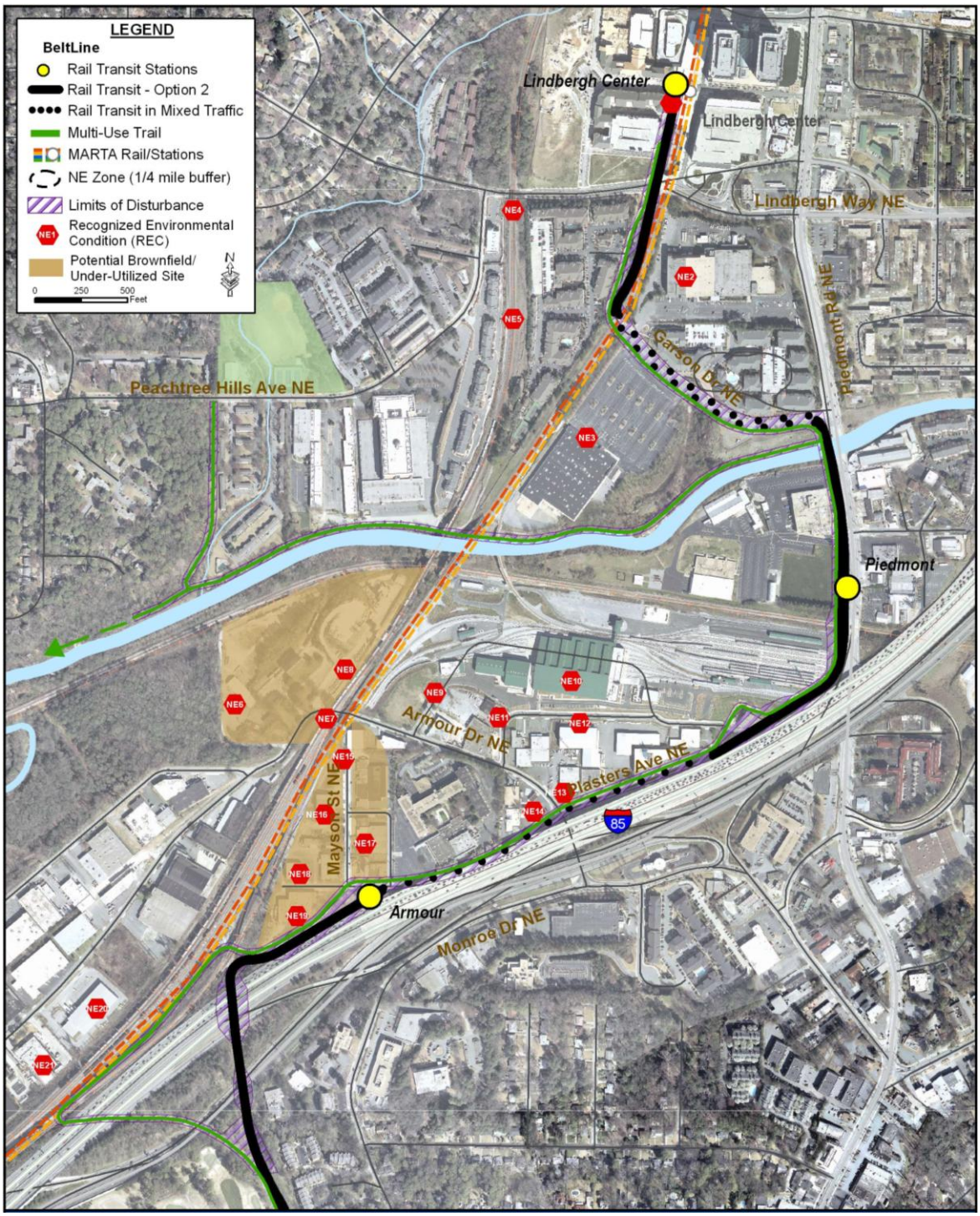


Figure 4-25: Hazardous Materials Sites (Armour/Lindbergh Area, Option 3)

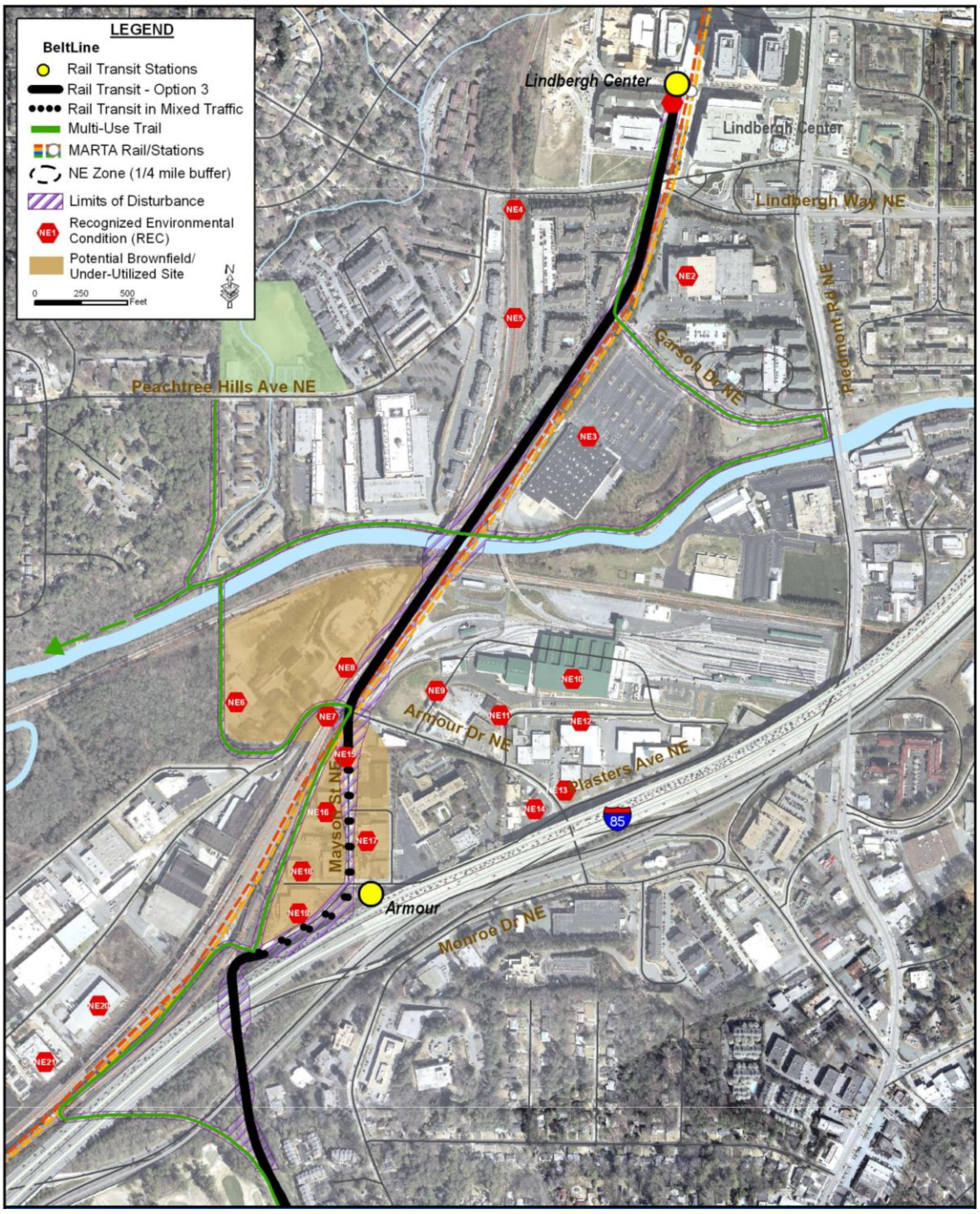


Figure 4-26: Hazardous Materials Sites (Montgomery Ferry/Ansley Area)

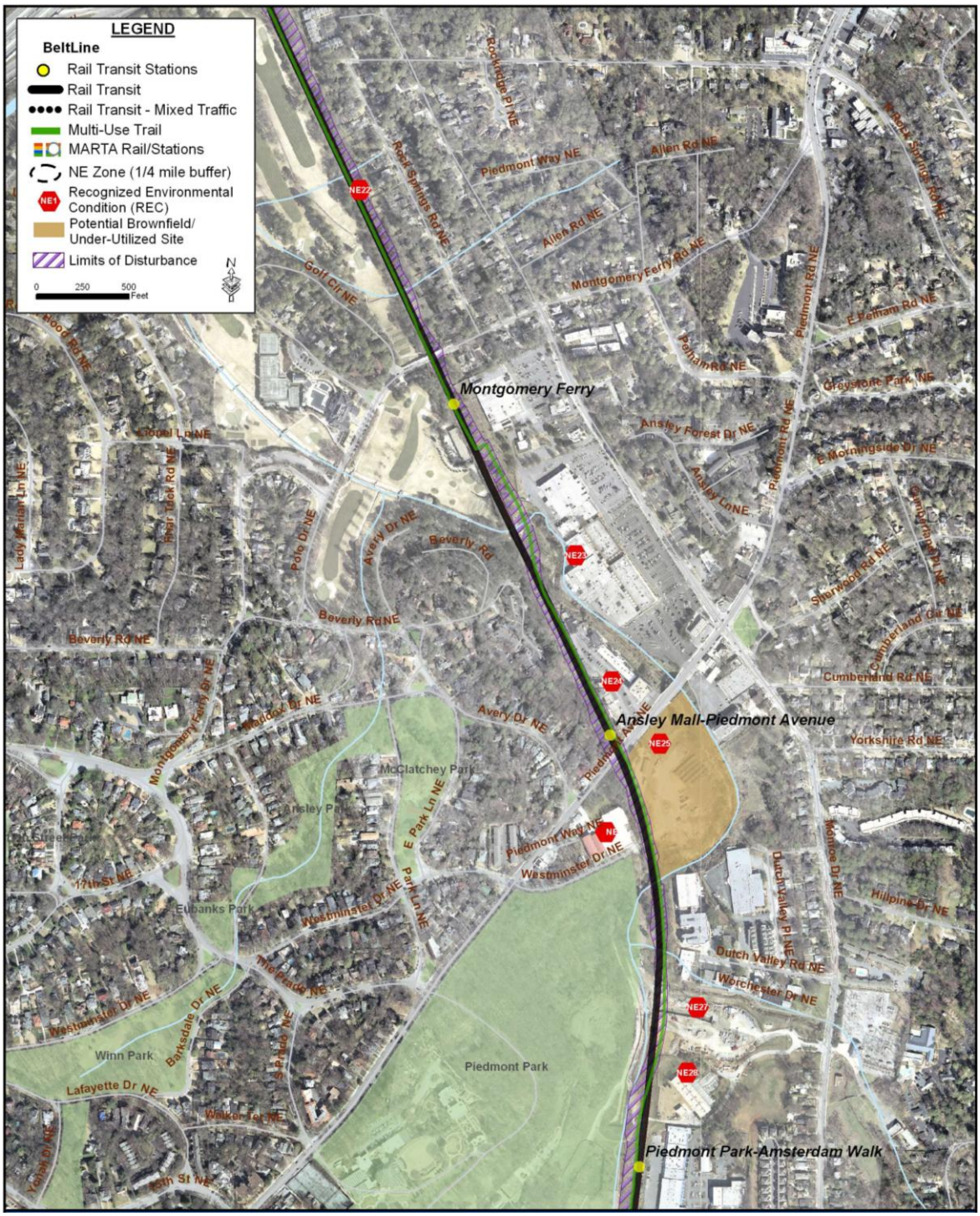


Figure 4-27: Hazardous Materials Sites (Piedmont Park/Ponce de Leon Area)

Figure 4-28: Hazardous Materials Sites (Freedom Parkway Area)

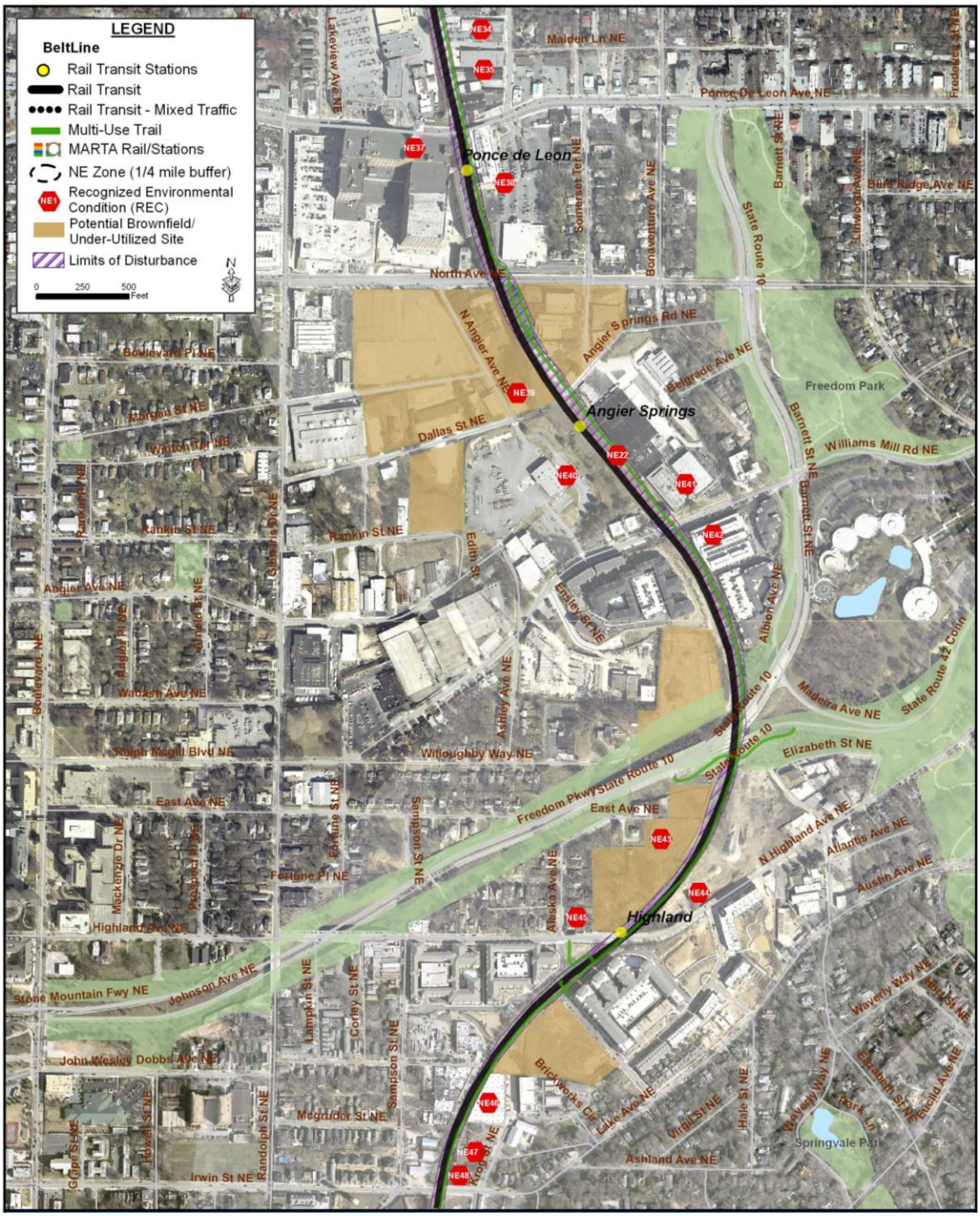


Figure 4-29: Hazardous Materials Sites (Old Fourth Ward/Cabbagetown Area)

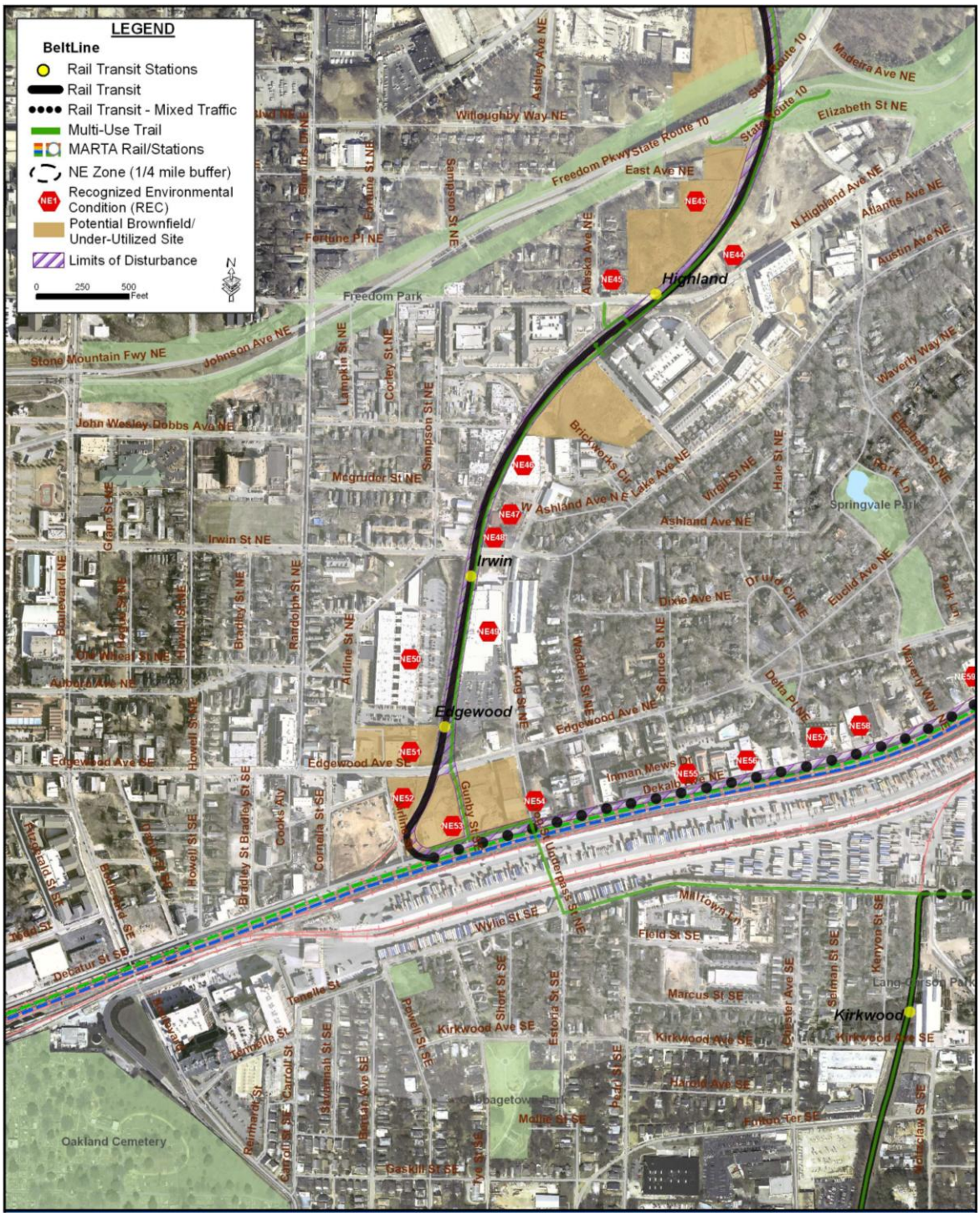


Figure 4-30: Hazardous Materials Sites (Inman Park/Reynoldstown Area)

demolition is necessary for the development of the proposed action.

Eleven potential brownfields or under-utilized locations were determined to be present within the 200-foot buffer of the proposed action. Many of the sites were either vacant at the time of the survey or contained apparent under-utilized or abandoned single-story warehouses. In situations where redevelopment is supportive of the *BeltLine Redevelopment Plan*, ABI will coordinate with the City of Atlanta and MARTA to identify strategic opportunities for assessment and remediation of brownfield sites.

4.13 Evaluation of Alternatives and Options

Representing the Proposed State Action in this EER, the Build Alternative would result in minor effects in the following resource categories:

- Wetlands/Waters of the U.S. and State;
- Floodplains;
- Storm Water;
- Waste Water;
- Air Quality;
- Solid Wastes/Solid Waste Landfills;
- Soil Stability/Erodibility;
- Historic Resources;
- Archaeological Resources;
- Parks/Recreation Areas;
- Energy Supplies; and
- Hazardous Materials/Contaminated Sites

For the Build Alternative scenario, MARTA and ABI would implement avoidance and mitigation strategies outlined for each resource area in the preceding sections, in coordination with federal, state, and local/regional stakeholders during detailed design phases, to limit the degrees of impact.

The No Build Alternative would avoid the occurrence of these environmental effects. However, the existing and planned transportation facilities and services within the No Build Alternative would not offer an adequate or comparable level of support in the Northeast Zone to goals improving regional mobility, accessibility between neighborhoods, public health, and community redevelopment.

Within the No Build Alternative, while multiple bus transit routes intersect or operate partially within the Northeast Zone, a single existing bus transit route, MARTA Route 6, connects the Inman Park/Reynoldstown and Lindbergh Center MARTA Station areas. Oriented to serve the Emory University and Clifton Road corridor activity centers in DeKalb County, east of the study area, the route does not connect with other communities and destinations in the Northeast Zone. With exception to the Freedom

Parkway trail, which generally crosses the Northeast Zone in east-west direction, there are no continuous pedestrian or bicycle facilities connecting communities, parks, and recreation areas in the study area.

There were several alignment options in the Armour/Lindbergh area, north of I-85, under consideration in the EER. As each option is adjacent to at least one hazardous materials site and poses potential impacts to floodplains in this area, none of the alignment options completely avoid adverse environmental effects in the absence of mitigation strategies.

There is no significant differential in environmental effects among the transit technology options.

Page Left Blank

5.0 SHORT-TERM AND LONG-TERM BENEFITS

The BeltLine Corridor, including the Northeast Zone, offers a unique opportunity to provide integral linkages between existing and planned development, existing and planned recreational opportunities, and the existing transportation network. The project would support the sustainable and efficient use of urban land in the Atlanta region through transit-oriented, mixed-use development to help reduce per capita vehicle miles traveled (VMT) and decrease automobile dependence. In the Northeast Zone, the proposed action would offer more direct, multimodal alternatives to single-occupant vehicle travel between the Inman Park/Reynoldstown and Lindbergh Center areas. It would also serve as a basis for:

- neighborhood preservation and revitalization;
- mixed-use development;
- job creation;
- affordable housing;
- cleaner air;
- an improved tax base;
- an improved quality of life in Atlanta's central core; and
- improved public health by encouraging recreational and commuting activity via the multi-use trail network.

The BeltLine Corridor project in the Northeast Zone can significantly address needs cited in the comprehensive transportation plan for the City of Atlanta, the *Connect Atlanta Plan* (2008). The plan recognizes the BeltLine concept as a "forward-thinking approach to modernizing infrastructure for purposes of urban livability". This plan expresses key challenges and needs which the BeltLine can help address. Among these needs are:

- the expansion of pedestrian and bicycle travel options in the City of Atlanta where total sidewalk distances represent only about 60 percent of city street lengths,[4] and where limited public right-of-way is dedicated toward amenities supporting non-motorized vehicle mobility;
- the improvement of pedestrian and bicycle connections to MARTA station areas, where the availability of sidewalks, bicycle paths, and safe crossings is often limited;
- the advancement of the City of Atlanta *Commuter On-Street Bike Plan* (1995), as only 34 of the City's planned 354 miles of bicycle routes have been constructed and are often discontinuous;
- the provision of higher-capacity, premium transit service to support projected population growth in redeveloping areas, improve mobility for transportation disadvantaged populations, and provide more reliable access to current and emerging activity centers;

[4] City of Atlanta, December 2008. *Connect Atlanta Plan.*

- the provision of travel modes that are time-competitive for short-distance urban trips, as trips beginning in the City of Atlanta require only about 40 percent of the average VMT of trips taken in the larger Atlanta region;[5]
- the mitigation of connectivity barriers imposed on neighborhoods by existing transportation facilities (limited-access roads, railroads) and by conventional land development and street network design; and
- the promotion of connections to cultural sites and historic neighborhoods, including the provision of transportation modes similar to those once integral to the development of some historic communities, and the provision of interpretive signage and context-sensitive design throughout the BeltLine Corridor.

Various community-level planning endeavors in the Northeast Zone have revealed the need for many of these and other benefits, particularly for enhancements to community-level mobility, a more sustainable urban environment, more coordinated land use and transportation investment policies, more efficient use of existing land and infrastructure, and improved neighborhood access to regional transit options. Among other planning activities, these include the *Old Fourth Ward Master Plan* (2008), *Ponce de Leon/Moreland Avenue Corridors Study* (2005), and the *District 2 Rail Corridor Assessment* (2001) by the City of Atlanta, the City Center *Livable Centers Initiative* (LCI) plan by ARC, and the *Piedmont Heights: Blueprints for Successful Communities* (2007) plan by the Georgia Conservancy.

The *BeltLine Health Impact Assessment* (2007) by the Center for Quality Growth and Regional Development revealed the potentially positive benefits to active living and public health, including significantly enhanced access to parks and trails, greater opportunities for physical recreation activities, and greater equity in access to healthy foods and diverse housing options.

Short-term economic advantages relate to employment generated by environmental remediation and project construction. Expanded sales and use tax revenue from the construction of a mix of compatible land uses is an additional short-term advantage.

Short-term economic disadvantages relate to business relocation and right-of-way acquisition in certain Northeast Zone areas outside of the Atlanta Development Authority right-of-way, along with modified access, debris, noise, and vibration for businesses during construction periods.

Long-term economic advantages of the project derive from enhanced mobility, access to jobs, schools, workforce housing and activity centers, relief of congested urban thoroughfares, redevelopment of brownfield sites, and new employment and housing generated by transit-oriented redevelopment.

The *BeltLine Redevelopment Plan* (2005) highlights several long-term economic gains within the study area, including an expanded tax base, preservation of light industrial districts, additional workforce housing units and the generation of thousands of permanent jobs in redeveloping areas. BeltLine redevelopment would assist in clustering

[5] City of Atlanta, December 2008. *Connect Atlanta Plan.*

a significant portion of the Atlanta region's growing population in pedestrian-oriented urban areas, in support of the City's *New Century Economic Development Plan* (2005) and the Atlanta Regional Commission's *Regional Development Plan Policies* (2007). Funding derived from the City's BeltLine Tax Allocation District would help drive many of these economic changes.

Within the corridor, long-term economic disadvantages are possible in the loss of taxable land necessary for BeltLine Corridor project development. Continued BeltLine project development and advancement of coordinated transit services, parks, and multi-use trails beyond the Northeast Zone would be necessary to avoid long-term economic disparities. Construction in the Northeast Zone of the BeltLine Corridor is vital to achieving the larger strategic goal of connecting communities around Atlanta via transit and non-motorized travel.

Page Left Blank

6.0 VALUES OF SHORT-TERM USES OF THE ENVIRONMENT AND MAINTENANCE AND ENHANCEMENT OF LONG-TERM VALUES

Short-term losses pertaining to this proposed action would result from right-of-way acquisition, resource preservation, and construction. Short-term uses of resources resulting from this project would include the relocation within the corridor of portions of the railbed and certain cultural resources, to support the construction of transit and multi-use trails.

Further, the construction of new or extended structures supporting trails and tracks in the Northeast Zone would result in an encroachment of the regulatory floodway of Peachtree Creek and Clear Creek. Compensatory mitigation banking measures would offset impacts to these buffer areas to achieve no net loss of ecological function to riparian zones within these watersheds. Grading of Northeast Zone ROW adjacent to existing paving would increase the potential for soil erosion. The introduction of best management practices in the provisions of construction contracts would effectively mitigate the possibility of sediment washing onto adjacent properties and/or polluting nearby streams.

Temporary community impacts would include the generation of dust, noise, and vibration from construction activities and construction vehicle movement, temporary disruption and relocation of utilities, and the modification of access and redistribution of traffic during construction. Haul routes and access points for vehicles disposing debris may occur on roads other than designated truck routes. The preceding section (Section 5.0) highlights the beneficial long-term enhancements for impacted communities beyond the construction period.

Long-term net reductions in per capita energy expenditure for purposes of mobility and accessibility following project construction would significantly exceed energy expenditures from vehicles and equipment during the construction phase.

Other enhanced values extending through the life of the project include:

- preservation of cultural resources within the BeltLine Corridor, providing enhancements through the context-sensitive design of the alignments, maintenance yard, equipment and station areas;
- a more sustainable urban ecosystem through the eradication and control of invasive species and the removal of hazardous and solid waste within the BeltLine Corridor; and
- significantly enhanced connections among existing and planned parks.

Page Left Blank

7.0 COORDINATION AND COMMENTS

7.1 Study Coordination

During early project development, MARTA and ABI contacted a number of agencies, including federal, state, and regional/local governments and regional/local planning agencies, and asked for their comments on the proposed action.

MARTA invited potential consulting parties to comment on the Atlanta BeltLine Northeast Zone project in accordance with Section 12-16-4(b) of GEPA. These agencies included:

- National Park Service (Southeast Regional Office);
- Natural Resources Conservation Service;
- U.S. Department of Housing and Urban Development (Regional Office of Environment)
- USEPA Region 4;
- USGS;
- Atlanta Regional Commission;
- Georgia Forestry Commission;
- Fulton County Board of Commissioners; and
- City of Atlanta Department of Planning and Community Development.

MARTA requested the potential consulting parties to provide information on any known project-area conditions of concern within the vicinity of the Northeast Zone via a letter dated September 26, 2008. MARTA and ABI did not receive comments from most of these agencies. Appendix B includes correspondence from responding state agencies. Additionally, the Georgia EPD provided guidance on matters of GEPA policy and procedure as well as EER methodology.

There was close coordination with the Georgia SHPO and other agencies with an interest in cultural resources during the surveys for archaeological and historic resources. The study team met with the Atlanta Urban Design Commission (AUDC) in late August and September 2008 to discuss their efforts in identifying and surveying historic resources around the entire BeltLine Corridor. The AUDC provided copies of their survey reports, maps and building summaries, and additional background research materials, which assisted with resource identification.

In addition, the study team met with the Georgia SHPO on several occasions while preparing the EER. Meetings with SHPO staff allowed the study team to introduce the project and discuss the environmental study process, cultural resource survey methodologies, design considerations, survey reports, methodologies for assessing effects, and conceptual planning of selected areas along the Northeast Zone.

MARTA and ABI initiated the BeltLine Corridor Environmental Study in July 2008, holding meetings in July and August 2008 to discuss the corridor, including the Northeast Zone. Input from stakeholders and the public assisted in refining the purpose and need

statement and study goals and objectives, while identifying social, environmental, and economic issues of concern.

MARTA and ABI promoted the upcoming availability of this EER and the Public Hearing during a "Citywide Conversation on Transit and Trails" and a series of target audience briefings and BeltLine public workshops throughout Atlanta. MARTA and ABI held these meetings between March and May 2009.

MARTA and ABI convened a Stakeholder Advisory Committee (SAC) and a Technical Advisory Committee (TAC) to guide the overall environmental study process. The SAC assists in generating participation from the public at large and reviews study findings. The TAC provides a forum for coordination at key study milestones and works through detailed technical issues associated with the study and the proposed project.

Coordination of these agencies and additional stakeholders in the Northeast Zone and throughout the BeltLine Corridor will continue as planning and design for the project progresses.

7.2 Public Comments

MARTA, in coordination with ABI, will advertise the availability of this EER and will hold a Public Hearing during the public comment period for the EER.

The scheduled date and time for the Public Hearing is May 14, 2009, from 6:30-8:30 PM. The public hearing location is:

Hillside, Inc.
1301 Monroe Drive NE
Atlanta, GA 30306

Persons may address comments concerning this EER to either of the following:

Mr. Henry Ikwut-Ukwa
Manager – Planning Initiatives
Metropolitan Atlanta Rapid Transit Authority (MARTA)
2424 Piedmont Road, N.E.
Atlanta, GA 30324-3330

OR

Mr. Nathan Conable
Senior Project Manager, Atlanta BeltLine, Inc.
Atlanta Development Authority
86 Pryor Street, S.W.
Atlanta, GA 30303

Interested persons may submit electronic comments via the BeltLine Environmental Corridor Study website (http://www.itsmarta.com/newsroom/beltline.html).

After reviewing comments received during the comment period, MARTA and Atlanta Development Authority (via ABI) will issue a Notice of Decision, recommending an

alternative and an alignment option for transit and multi-use trails. MARTA and ABI will advertise the decision in the legal organ of Fulton County and forward the decision to the director of the Georgia EPD.

Page Left Blank

APPENDIX A

List of Acronyms and Abbreviations

Page Left Blank

APPENDIX A

LIST OF ACRONYMS AND ABBREVIATIONS

ABI	Atlanta BeltLine, Inc.
ACM	Asbestos Containing Materials
ADA	Atlanta Development Authority
ADAC	Atlanta Decorative Arts Center
APE	Area of Potential Effect
ARC	Atlanta Regional Commission
AUDC	Atlanta Urban Design Commission
BTU	British Thermal Unit
C&D	Construction/Demolition
CFR	Code of Federal Regulations
CY	Cubic Yards
CYD	Cubic Yards per Day
DNR	Georgia Department of Natural Resources
EER	Environmental Effects Report
EO	Executive Order
FEMA	Federal Emergency Management Agency
FWCA	Fish and Wildlife Coordination Act
GDOT	Georgia Department of Transportation
GEPA	Georgia Environmental Protection Act
HOV	High Occupancy Vehicle
LOD	Limits of Disturbance
LRT	Light Rail Transit
LWCF	Land and Water Conservation Fund
MARTA	Metropolitan Atlanta Rapid Transit Authority
MSW	Municipal Solid Waste
NAAQS	National Ambient Air Quality Standards
NAHRGIS	Natural, Archaeological and Historic Resources Geographical Information System
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
O.C.G.A.	Official Code of Georgia
PM2.5	Fine Particulate Matter
REC	Recognized Environmental Condition
ROD	Record of Decision
ROW	Right-of-Way

RTP	Regional Transportation Plan
SAC	Stakeholder Advisory Committee
SHPO	State Historic Preservation Officer
TAC	Technical Advisory Committee
TIP	Transportation Improvement Plan
USACE	United States Army Corps of Engineers
USC	United States Code
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	Underground Storage Tank
VMT	Vehicle Miles Traveled

APPENDIX B

Glossary

Page Left Blank

APPENDIX B

GLOSSARY

100-year floodplain – The area that will be inundated by the flood event having a 1-percent chance of being equaled or exceeded in any given year. In this document the 100-year floodplain refers to designated areas established by Flood Insurance Rate Maps produced by the National Flood Insurance Program**.**

303(d) List – See *Section 303(d)*.

abandoned right-of-way – Railroad right-of-way that is no longer used by a railroad operator. The Federal Surface Transportation Board reviews and approves requests for railroad right-of-way abandonment.

accessibility – A measure of the degree of difficulty in reaching other locations, goods, services or activities from a given site. It is influenced by changes in travel time, safety, vehicle operating costs, transportation mode, and local and regional land use conditions.

adverse effect – In the context of cultural resources reviewed in this report, the term is defined in Section 106 of the National Historic Preservation Act (36 CFR 800.5(a)(1)). An adverse effect to a historic property occurs when the project under consideration would potentially alter any characteristic that qualifies the property for inclusion in the National Register of Historic Places in a manner that would diminish the integrity of the property.

affected environment – Ambient conditions of the relevant study area at the time an Environmental Effects Report is prepared.

alignment – The ground plan of a railway, trail, roadway or other fixed route.

ambient air – A physical and chemical measure of the concentration of various chemicals in the outside air, usually determined over a specific time period (e.g., one hour, eight hours).

Area of Potential Effect (APE) – The geographic area within which an undertaking may alter the character or use of a historic property. The APE is determined through coordination with the State Historic Preservation Office, in accordance with the National Historic Preservation Act of 1966, as amended, and other state historic preservation regulations.

at-grade – Occurring at the same ground-level elevation, especially in reference to a crossing point or intersection of two separate transportation facilities (e.g. road, sidewalk, bicycle path, railroad, etc.).

attainment area – An area where the quality of air is as good as or better than the National Ambient Air Quality Standards that are defined in the Federal Clean Air Act. An area may be an attainment area for one pollutant and a non-attainment area for others.

bankfull conditions – The stage at which additional volume in a stream channel can result in stream overflow onto nearby floodplains.

bankfull depth – The depth of a stream during bankfull conditions.

bankfull width – The width of a stream during bankfull conditions.

BeltLine Tax Allocation District (TAD) – A special tax district created in 2005 by the Atlanta City Council, the Atlanta Public School Board, and the Fulton County Commission. It comprises a 6,500-acre area along the BeltLine corridor. Subsequent growth in property tax revenue above the 2005 revenue from the area will be used to fund public improvements within the TAD. The majority of the BeltLine TAD funds will be used to invest in land acquisition, multi-use trails, greenspace, transit, transportation improvements, and affordable workforce housing and Atlanta Public Schools projects. Some BeltLine TAD funds will be used for developer infrastructure, primarily for environmental brownfield cleanup, or to jump-start development in underdeveloped areas. The TAD will expire in 2031.

boardings, passenger – The count of passengers embarking onto a transit vehicle or route for the purposes of measuring ridership or fare revenue.

British Thermal Unit (BTU) – The amount of heat energy required to raise the temperature of one pound of liquid water by one degree from 60° to 61°Fahrenheit at a constant pressure of one atmosphere

brownfield – Real property, of which the expansion, redevelopment, or reuse may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.

centerline – The line corresponding to the central geometric axis of a railroad track, road, trail or other transportation corridor. It is typically used as the reference point for measurements of track dimensions and location.

channel, stream – An open conduit either naturally or artificially created which periodically or continuously contains moving water.

Clean Air Act Amendments of 1990 – A strategy by the Federal government to address the problem of urban smog. It requires states and the Federal government to reduce emissions from automobiles, trucks, buses, ships, barges, and consumer products, and to meet air quality standards. It particularly addresses the urban problems of ozone, carbon monoxide (CO), and particulate matter (PM-10). It established a process for the designation of “attainment” and “nonattainment” areas by the U.S. Environmental Protection Agency.

clear-span – A bridge span that does not have any physical obstructions such as support columns underneath.

compensatory mitigation – The restoration, establishment, enhancement, or in certain circumstances preservation of wetlands, streams or other aquatic resources for the purpose of offsetting unavoidable adverse impacts to wetland and aquatic resource functions in the watershed.

Construction and Demolition (C&D) waste – Waste resulting from construction, remodeling, repair, and demolition operations on pavements, houses, commercial

buildings and other structures. It is distinct from Municipal Solid Waste in terms of the applicable regulations for handling and disposal.

critical habitat – Defined under the Federal Endangered Species Act of 1973 as areas within a listed species' current range (at the time of listing) that contain the physical or biological features that are essential to that species' conservation or that for some reason require special management and areas outside the species' current range that the Secretary of the Interior determines to be essential to its conservation.

cross-section – The cross-sectional configuration of a transportation corridor (railway, trail, roadway, etc.) that specifies typical widths for tracks/travel lanes, related facilities, buffer areas and total right-of-way.

cultural resource – Defined as both architectural and archaeological resources and typically including resources such as buildings, structures, religious properties, cemeteries, and Native American tribal areas. The historic significance of these types of resources is determined by applying the criteria set forth in the National Register of Historic Places Evaluation Criteria.

culvert, bottomless – A culvert that retains the natural streambed to facilitate fish passage and help maintain aquatic habitat for a range of organisms.

culvert, box – A rectangular concrete culvert that is enclosed on four-sides and replaces the natural stream bed with a flat concrete surface.

determination of eligibility – Decision made by the State Historic Preservation Office (SHPO) regarding whether a historic building or district is eligible for listing in the National Register of Historic Places.

designated use (waterway) – In accordance with the Federal Clean Water Act, the State of Georgia classifies all waters into categories of intended use, which accordingly have different water quality standards. Examples of designated uses include drinking water supply, fishing, and recreation.

effects – Synonymous with impacts of a proposed action; includes both beneficial and detrimental outcomes.

endangered – A species whose prospects for survival within the state are in immediate danger based on a loss of habitat, over-exploitation, predation, competition, or disease. An endangered species requires immediate attention or extinction will likely follow. The Federal government maintains a list of designated endangered species in accordance with the Endangered Species Act of 1973.

ephemeral stream – A stream that has flowing water only during, and for a short duration after, precipitation events in a typical year. Ephemeral stream beds are located above the water table year-round. Groundwater is not a source of water for the stream. Runoff from rainfall is the primary source of water for stream flow.

fixed transit guideway – An exclusive travel way used by a particular mode of public transportation.

floodplain – A nearly flat plain along the course of a stream or river that is naturally subject to flooding. In this document, the term floodplain generally refers to one of the Flood Hazard Areas defined by the National Flood Insurance Program and mapped in a Flood Insurance Rate Map.

floodway – see *regulatory floodway*

forested area (as defined by the Georgia Environmental Policy Act) – Five acres or more of trees over two inches in diameter at breast height is recognized as a forested area by the Georgia Environmental Policy Act for the purpose of considering environmental consequences of Proposed State Actions.

fugitive dust – Dust that leaves a property during construction, demolition, or other induced activity and that can alter the air quality at a given location.

Georgia Air Quality Control Act of 1967 – An act of the Georgia General Assembly that together with the Federal Clean Air Act, provides the basis for state air quality programs as implemented by the Environmental Protection Division of the Georgia Department of Natural Resources.

Georgia Environmental Policy Act of 1991 – An act of the Georgia General Assembly that establishes a process for environmental review and disclosure of potential environmental impacts by proposed state actions. See *Proposed State Action*.

Georgia Register of Historic Places – The Georgia Register is the state's official list of historic buildings, structures, sites, objects, and districts that provides recognition of a property's architectural, historical, or archaeological significance to the state. The Georgia Register program is administered by the Historic Preservation Division (HPD) of the Department of Natural Resources. It identifies properties for planning purposes and ensures that these properties will be taken into account in the planning of state assisted projects and preservation efforts.

grade crossing – An intersection where a roadway crosses a railway at the same elevation.

grade separation – The separation of the elevations at which different roads or railroad tracks intersect one another in order to avoid traffic conflicts.

habitat – The area or environment where an organism or ecological community normally lives or occurs.

hazardous material – Any toxic substance or explosive, corrosive, combustible, poisonous, or radioactive material that poses a risk to the public's health, safety or property.

headway – The scheduled time between transit vehicle runs operating on a particular transit route.

heavy rail – An electric railway with capacity for a heavy volume of traffic and characterized by exclusive rights-of-way, high speed and rapid acceleration. The existing

MARTA rail system comprises heavy rail lines. Heavy rail is different from commuter rail and light rail systems.

Historic District – A concentration of sites, buildings, structures, or objects that are listed or eligible for listing on the National and Georgia Register of Historic Places.

hydric – Having high water content.

hydrophytic vegetation – Plant life growing in water or in earth that is at least periodically deficient in oxygen as a result of excessive water content.

impaired stream – A stream with water quality that does not support its designated use as defined by the State of Georgia in accordance with Section 303(d) of the Federal Clean Water Act.

indirect effects – Effects that would be caused by a Proposed State Action but that would occur later in time or farther removed in distance but that are still reasonably foreseeable.

intermittent stream – A stream that has flowing water during certain times of the year, when groundwater provides water for stream flow. During dry periods, intermittent streams may not have flowing water. Runoff from rainfall is a supplemental source of water for stream flow.

invasive species – A species that is non-native to the ecosystem under consideration and whose introduction causes or is likely to cause economic harm, environmental harm, or harm to human health.

jurisdictional wetland – A wetland that is regulated by Section 404 of the federal Clean Water Act.

jurisdictional stream – A stream that is regulated by Section 404 of the federal Clean Water Act.

Light Rail Transit (LRT) – An electric-powered rail system characterized by its ability to operate single- or multiple-car trains along exclusive rights-of-way, in subways, on aerial structures, or on streets with mixed traffic. It is able to board and discharge passengers at station platforms or at street, track, or car floor level. Some types of light rail transit systems may be referred to as streetcar, trolley, or tramway systems.

Limits of Disturbance (LOD) – The likely “footprint” or physical extent of the proposed project.

mesoscale analysis – An air quality analysis that is about 2 to 200 km (1.2–120 mi.) in horizontal extent.

migratory birds – bird species that embark on regular seasonal journeys on an annual basis for purposes such as breeding or feeding or in response to weather conditions. Migratory birds are protected under the federal Migratory Bird Treaty Act.

mitigation – Action necessary to reduce, minimize or eliminate an impact to the affected environment by the proposed project.

mobility – The degree to which a person is able to move about; it is determined by a person's economic situation in addition to any physical disabilities she or he may possess.

multi-use trail – A trail designed for a variety of non-motorized transportation modes and recreational uses, including walking, jogging, bicycling, and in-line skating as permitted by the facility's design and regulations.

Municipal Solid Waste (MSW) – Defined by the State of Georgia as solid waste derived from households, including garbage, trash, and sanitary waste in septic tanks and solid waste from single-family and multifamily residences, hotels and motels, bunkhouses, campgrounds, picnic grounds, and day use recreation areas. The term includes yard trimmings and commercial solid waste but does not include solid waste from mining, agricultural or silviculture operations, or industrial processes or operations. Waste from construction and demolition activities is generally included in a separate category - see *Construction and Demolition (C&D) waste*.

National Ambient Air Quality Standards (NAAQS) – Nationwide air quality standards established by the U.S. Environmental Protection Agency (EPA) in accordance with the federal Clean Air Act Amendments of 1990 that apply to six principal types of pollutants.

National Flood Insurance Program – A program of the Federal Emergency Management Agency (FEMA) that provides flood insurance to participating communities, issues floodplain management regulations, and identifies and maps floodplains

National Historic Landmark – A place that is designated by the US Department of the Interior as possessing exceptional value or quality in illustrating and interpreting the heritage of the United States. The National Park Service administers the National Historic Landmarks program for the Secretary of the Interior. Only 3% of properties listed in the National Register of Historic Places are designated as National Historic Landmarks.

National Register of Historic Places (NRHP or National Register) – A federal list of buildings, sites, districts or other properties that have a historic significance. The National Register of Historic Places is maintained by the Keeper of the National Register.

National Wetlands Inventory (NWI) – A geospatial database of wetlands maintained by the Division of Habitat and Resource Conservation of the U.S. Fish and Wildlife Service.

neighborhood – A contiguous residential area with distinct characteristics or boundaries.

No Build Alternative – The future condition of the study area in the absence of the proposed project. The No Build Alternative serves as a benchmark against which the potential impacts of other alternatives can be compared. It assumes that no improvements will be made with the exception of other committed projects and periodic maintenance and minor enhancements needed to maintain safe operation.

Nonattainment area – A geographic area that does not meet the air quality requirements of the Clean Air Act Amendments of 1990 and associated regulations.

ozone – A gas found in two different layers of earth's atmosphere: in the stratosphere (beginning seven to ten miles above earth's surface) and the troposphere (beginning at earth's surface and extending up to the stratosphere). In the stratosphere, ozone occurs naturally and provides a protective layer shielding earth from harmful ultraviolet radiation. In the troposphere, ozone is a major component of photochemical smog and can harm the respiratory systems of humans and other animals. It is a prevalent and widespread criteria pollutant that is regulated by the U.S. Environmental Protection Agency in accordance with the Clean Air Act. Ozone in the troposphere is produced by complex chemical reactions involving nitrogen oxides, which are among the primary pollutants emitted by combustion sources; hydrocarbons, released into the air through the combustion, handling and processing of petroleum products; and sunlight. This report is concerned with potential effects of the proposed state action on tropospheric ozone emissions and ambient levels.

palustrine – Relating to a system of inland, nontidal wetlands characterized by the presence of trees, shrubs, and emergent vegetation (vegetation that is rooted below water but grows above the surface). Palustrine wetlands range from permanently saturated or flooded land (as in marshes, swamps, and lake shores) to land that is wet only seasonally (as in vernal pools).

particulate matter (PM10 and PM2.5) – Particle pollution is a complex mixture of extremely small particles and liquid droplets. Particle pollution is made up of a number of components, including acids (such as nitrates and sulfates), organic chemicals, metals, and soil or dust particles. The US Environmental Protection Agency regulates two categories of particle pollution: *fine particles* (PM2.5), which are 2.5 micrometers in diameter and smaller; and *inhalable coarse particles* (PM10) which are smaller than 10 micrometers. (A micrometer is 1/1000th of a millimeter; there are 25,400 micrometers in an inch.)

perennial stream – A stream that has flowing water year-round during a typical year. The water table is located above the stream bed for most of the year. Groundwater is the primary source of water for stream flow. Runoff from rainfall is a supplemental source of water for stream flow.

Phase I Archaeological Survey – The first step in a cultural resource archaeology investigation. The Phase I Survey assesses the potential presence and locations of potential archaeological sites within a study area using background research and field reconnaissance.

Piedmont Physiographic Province – The physiographic province in which the study area is located. A physiographic province is a region in which the landforms are similar in geologic structure and differ significantly from the landform patterns in adjacent regions. The Georgia Piedmont is characterized by a rolling surface with slopes of minimal relief and stream valleys of greater depth and steeper slopes.

priority watershed – A river watershed selected for protection and restoration efforts through a cooperative program between the State of Georgia and the U.S.

Environmental Protection Agency. The Chattahoochee River watershed is one of two watersheds in the State of Georgia that is part of the program.

Proposed State Action – An action by the State of Georgia that requires environmental evaluation in accordance with the Georgia Environmental Policy Act of 1991. Proposed State Actions include: any proposed land-disturbing activity undertaken by a state government agency or funded by a grant from a state government agency; any proposed sale or exchange of more than five acres of state owned land; or any proposed harvesting of five acres or more of trees over two inches in diameter at breast height. Municipal or County actions may be included under the Act if more than 50% of the cost is funded by a state government agency or a grant of more than $250,000.00 is made by a state government agency. The Act includes a list of exempt state actions.

Recognized Environmental Conditions (RECs) – A term defined by ASTM International, originally known as the American Society for Testing and Materials (ASTM). It is defined under ASTM E1527 - 05 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process. "The presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, ground water, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include de minimis conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be de minimis are not recognized environmental conditions."

regulatory floodway – Defined by the National Flood Insurance Program as the channel of a river or other watercourse and the adjacent land areas that must be reserved in order to discharge the base flood (the 100-year flood or flood event having a 1-percent chance of being equaled or exceeded in any given year) without cumulatively increasing the water surface elevation more than a designated height.

ridership – The number of people using a public transportation system during a given time period.

right-of-way (ROW) – A public or private area that allows for passage of people or goods, including, but not limited to, railways, freeways, streets, bicycle paths, alleys, trails and walkways. A public right-of-way is dedicated or deeded to the public entity for use under the control of a public agency.

riparian buffer – A strip of naturally vegetated land along a stream. The vegetation along the banks and in the adjacent floodplain area is characterized by plants that associate with waterways and nearby moist soils. Riparian buffers protect water quality and other natural functions of the stream by filtering storm water runoff, stabilizing stream banks, moderating water temperatures, and providing habitat for wildlife.

runoff – The part of precipitation, snow melt, or irrigation water that runs off the land into streams and lakes. It can carry pollutants from the air and land into receiving waters.

Section 106 – A provision of the National Historic Preservation Act of 1966 that requires consideration of historic and archaeological properties and resources in Federal actions. Section 106 requires Federal agencies to assess potential effects of proposed actions on historic resources and provide opportunity for comment by the Advisory Council on Historic Preservation.

Section 303(d) – A provision of the federal Clean Water Act of 1977 that requires states to assess the conditions of their waters to determine where water quality is impaired (does not fully meet standards) or threatened (is likely to violate standards in the near future). The result of this review is the 303(d) list of impaired waters within the state, which must be submitted to the EPA every other year. Section 303(d) also requires states to prioritize and target water bodies on their list for development of water quality improvement strategies.

Section 404 – A provision of the federal Clean Water Act of 1977 which establishes a program to regulate the discharge of dredged or fill material into waters of the United States. Proposed impacts to waters of the U.S., including wetlands, streams and other open water bodies, are regulated by this provision.

Section 404 Permit – A permit issued in accordance with Section 404 of the Clean Water Act of 1977. The permitting program is administered by the U.S. Army Corps of Engineers.

significant – Term used regarding the magnitude of potential effects or impacts of projects regulated by the Georgia Environmental Policy Act. A proposed action is considered in both context and intensity to determine whether or not the action would likely significantly impact a habitat, neighborhood, species or other resource in the study area.

sinuosity – A measure of the degree of curvature of a stream channel.

station platform – The area where passengers board and disembark from a train or subway vehicle.

State Historic Preservation Office (SHPO) – A state administrative agency responsible for carrying out consultation in accordance with the National Historic Preservation Act of 1966, as amended, and other state historic preservation regulations.

State Implementation Plan (SIP) – A state plan for the establishment, regulation, and enforcement of Federal air pollution standards. It is reviewed and approved by the US Environmental Protection Agency in accordance with the Clean Air Act Amendments of 1990.

storm water – Runoff water that is generated by a rain event. Storm water discharges include runoff from land, pavements, building rooftops and other surfaces. Storm water runoff can accumulate a variety of pollutants such as oil and grease, chemicals, nutrients, metals, and bacteria as it travels across land before discharging into surface and other receiving waters. Heavy surges in storm water runoff can cause other negative effects, including flooding and erosion, to streams and adjacent low-lying areas, especially in urbanized watersheds.

Stream Buffer Variance – A variance granted to the stream buffer requirements of the Georgia Erosion and Sedimentation Act of 1975. In certain circumstances, when encroachment on a required stream buffer cannot be avoided, the Georgia Environmental Protection Division (EPD) may grant a variance permitting construction to encroach into the stream buffer. Provisions of the variance require documentation of erosion control measures and mitigation practices to minimize buffer impacts.

stream mitigation credit – See *compensatory mitigation*. A mitigation credit is a form of compensation that can be purchased to offset unavoidable adverse impacts caused to a stream or to other aquatic resources such as wetlands. Credits are purchased from an approved mitigation bank, which is based on outside wetland area that has been restored, established, enhanced or preserved, and then set aside by a third party.

streetcar – A streetcar is a form of rail transit that generally refers to a type of light rail transit which uses smaller vehicles than typical light rail transit systems and generally operates as single-car trains. Modern Streetcars are capable of operating in mixed traffic and along exclusive fixed-rail guideways.

substrate, stream – Material that rests on the bottom of a stream.

Tax Allocation District (TAD) – See *BeltLine Tax Allocation District*.

terminus/termini – The end points of a transportation line or the districts/towns in which they are located.

Transportation Improvement Program – A prioritized list of regional transportation projects and proposed funding to be implemented in stages over several (3 to 5) years. The projects are selected from those proposed in the systems management element and the long-range element of the regional transportation planning process. This program is required as a condition for the region to receive federal transit and highway grants.

turbidity – A cloudy water quality condition due to suspended silt or organic matter.

underground storage tank (UST) – A tank located at least partially underground and designed to hold gasoline, other petroleum products or chemicals.

uplands – Land that is well-drained and rarely, if ever, inundated.

vegetated buffer/vegetative buffer – A vegetated upland or wetland area next to rivers, streams, lakes, or other open waters which separates the open water from developed areas and agricultural land. Vegetated buffers provide a variety of aquatic habitat functions and help improve or maintain local water quality. A vegetated buffer can be established by maintaining an existing vegetated area or by restoring a cleared or degraded area. See also *riparian buffer*.

vehicle miles traveled (VMT) – The number of miles traveled by an automobile per individual within a given area.

waste water – The water and wastes from homes, businesses, institutions and infrastructure facilities that enter pipes and are transported to treatment plants for treatment and disposal.

Waters of the State of Georgia – Defined in Georgia law (O.C.G.A. 27-1-2(73)) as: "any waters within the territorial limits of this state and the marginal sea adjacent to this state and the high seas when navigated as a part of a journey or ride to or from the shore of this state except ponds or lakes not open to the public, whether such ponds or lakes are within the lands of one title or not."

Waters of the United States – All waters defined under the Clean Water Act 40 CFR 230.3(s) and subject to US Army Corps of Engineers jurisdiction. Waters of the United States include those which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide. The definition includes all impoundments, tributaries of and wetlands adjacent to such waters.

wetland – Tidal area or swamp with water saturated soil characteristics and associated vegetation that meets certain criteria. Filling and development of such areas are regulated by federal and state agencies. The Clean Water Act defines the term wetlands as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs and similar areas."

Page Left Blank

APPENDIX C

Agency Correspondence

From: Larry Morris [mailto:lmorris@GFC.STATE.GA.US]
Sent: Thursday, October 23, 2008 7:58 AM
To: Williams, Donald
Cc: Frank Green; Sherrie Gabriel
Subject: Beltline

Dear Mr. Williams:

Several weeks ago I received a GEPA Early Coordination Request for a portion of the northeast quadrant of the Atlanta Beltline. This section of the beltline is in the general area around Armour/Lindbergh and involves both a multi-use trail and light rail/streetcar corridor.

I had an opportunity to visit the area yesterday. Since the exact routes have not yet been established on the ground, I can only make some general observations derived from my drive around the area. I've also used Google Earth to better help me see some areas I could not access.

From the standpoint of canopy loss in the area, I see nothing that gives me great cause for concern. Much of the area is industrial in nature, hence the existing tree cover is light to almost non-existent. Although street trees are present along many of the surface streets in this quadrant, I would anticipate minimal disturbance in these areas. Peachtree Hills and Peachtree Creek are the primary areas with significant tree cover. This canopy cover is one of the most attractive features in the area and it provides many environmental benefits, especially with reference to water quality issues in Peachtree Creek. I would encourage the retention of as much of the existing canopy as possible during construction of these two transportation routes.

Also, the City of Atlanta has a tree ordinance which is managed by the City Arborist. I'm sure that you have solicited input from this department, but if not I encourage you to do so. You can call 404-330-6836 for assistance.

Sincerely,

Larry Morris
Associate Chief
Sustainable Community Forestry Program
1055 East Whitehall Road
Athens, Ga. 30605
706-542-6880
lmorris@gfc.state.ga.us

Noel Holcomb, Commissioner
Dan Forster, Director

Georgia Department of Natural Resources
Wildlife Resources Division
Nongame Conservation Section
2065 U.S. Highway 278, S.E., Social Circle, Georgia 30025-4743
(770) 918 6411

DMJ 0801

November 13, 2008

John Casey Glen
Senior Ecologist
Edwards-Pitman
1250 Winchester Pkwy
Suite 200
Smyrna, GA 30080

Subject: **Known occurrences of natural communities, plants and animals of highest priority conservation status on or near Atlanta BeltLine Early Coordination Request, Fulton County, Georgia**

Dear Mr. Glen:

This is in response to your request of November 3, 2008. According to our records, within a three-mile radius of the project corridor there are the following Natural Heritage Database occurrences:

North End of Project (-84.36997, 33.82214; NAD27):
[Fulton County] approx. 1.0 mi. SE of site
GA *Cambarus howardi* (Chattahoochee Crayfish) [HISTORIC] approx. 2.5 mi. SE of site in Peachtree Creek and Tributaries
Panax quinquefolius (American Ginseng) approx. 3.0 mi. SE of site
GA *Schisandra glabra* (Bay Star-vine) approx. 1.5 mi. SE of site
GA *Schisandra glabra* (Bay Star-vine) approx. 3.0 mi. SE of site
Greenspace [Fulton County] approx. 1.0 mi. SE of site
Johns Sanctuary [Atlanta Audubon Society] approx. 2.5 mi. E of site

South End of Project (-84.36646, 33.75331; NAD27):
GA *Falco peregrinus* (Peregrine Falcon) approx. 1.5 mi. NW of site
GA *Schisandra glabra* (Bay Star-vine) approx. 2.5 mi. N of site

* Entries above proceeded by "US" indicates species with federal status in Georgia (Protected or Candidate). Species that are federally protected in Georgia are also state protected; "GA" indicates Georgia protected species.

Recommendations:

We have no records of high priority species of habitats within the project area. Since this project is in an urban setting, it is not likely to negatively impact rare species or habitats. We are glad to see projects to expand public transportation in Georgia. We recommend that stringent erosion control practices be used during construction activities and that vegetation is re-established on

IR 12300

disturbed areas as quickly as possible. Silt fences and other erosion control devices should be inspected and maintained until soil is stabilized by vegetation. Please use natural vegetation and grading techniques (e.g. vegetated swales, turn-offs, vegetated buffer strips) that will ensure that the ROW does not serve as a conduit for storm water or pollutants into the water during or after construction. These measures will help protect water quality in the vicinity of the project as well as in downstream areas.

Data Available on the Nongame Conservation Section Website

By visiting the Nongame Conservation Section Website you can view the highest priority species and natural community information by Quarter Quad, County and HUC8 Watershed. To access this information, please visit our GA Rare Species and Natural Community Information page at: http://georgiawildlife.dnr.state.ga.us/content/displaycontent.asp?txtDocument=89

An ESRI shape file of our highest priority species and natural community data by quarter quad and county is also available. It can be downloaded from: http://georgiawildlife.dnr.state.ga.us/assets/documents/gnhp/gnhpds.zip

Disclaimer:

Please keep in mind the limitations of our database. The data collected by the Nongame Conservation Section comes from a variety of sources, including museum and herbarium records, literature, and reports from individuals and organizations, as well as field surveys by our staff biologists. In most cases the information is not the result of a recent on-site survey by our staff. Many areas of Georgia have never been surveyed thoroughly. Therefore, the Nongame Conservation Section can only occasionally provide definitive information on the presence or absence of rare species on a given site. Our files are updated constantly as new information is received. **Thus, information provided by our program represents the existing data in our files at the time of the request and should not be considered a final statement on the species or area under consideration.**

If you know of populations of highest priority species that are not in our database, please fill out the appropriate data collection form and send it to our office. Forms can be obtained through our web site (http://www.georgiawildlife.com) or by contacting our office. If I can be of further assistance, please let me know.

Sincerely,

Katrina Morris
Environmental Review Coordinator

IR 12300

Georgia Department of Natural Resources

Noel Holcomb, Commissioner

Historic Preservation Division

W. Ray Luce, Division Director and Deputy State Historic Preservation Officer
34 Peachtree Street, NW, Suite 1600, Atlanta, Georgia 30303-2316
Telephone (404) 656-2840 Fax (404) 657-1040 http://www.gashpo.org

March 4, 2009

Henry Ikwut-Ukwa, Ph.D.
Manager, Planning Initiatives
Metropolitan Atlanta Rapid Transit Authority
2424 Piedmont Road, NE
Atlanta, Georgia 30324-3330

RE: Atlanta Beltline: 22-Mile Loop
Fulton County, Georgia
HP-080729-001

Dear Mr. Ikwut-Ukwa:

The Historic Preservation Division (HPD) has received the revised report *Phase I Archaeological Survey of the Proposed Atlanta BeltLine Corridor, Northeast Quadrant,* dated February 2009. Our comments are offered to assist in complying with provisions of the Georgia Environmental Policy Act (GEPA).

Thank you for providing HPD with additional information concerning the National and Georgia Register Eligibility of archaeological site 9FU77. We have reviewed this revised Phase I archaeological survey and concur with the proposed boundary for the National and Georgia Register of Historic Places eligible site, 9FU77.

We look forward to receiving additional information concerning the BeltLine project as it becomes available and working with you in the future. Please refer to project number **HP-080729-001** in any future correspondence regarding this undertaking. If we may be of further assistance, please do not hesitate to contact Elizabeth Shirk, Environmental Review Coordinator, at (404) 651-6624, or Michelle Volkema, Environmental Review Specialist, at (404) 651-6546.

Sincerely,

Karen Anderson-Córdova
Unit Manager, Planning & Local Assistance

KAC:mav

cc: Alan Tabachnick, AECOM
Doug Young, AUDC

Georgia Department of Natural Resources

Noel Holcomb, Commissioner

Historic Preservation Division

W. Ray Luce, Division Director and Deputy State Historic Preservation Officer
34 Peachtree Street, NW, Suite 1600, Atlanta, Georgia 30303-2316
Telephone (404) 656-2840 Fax (404) 657-1040 http://www.gashpo.org

March 11, 2009

Henry Ikwut-Ukwa
Manager, Planning Initiatives
Metropolitan Atlanta Rapid Transit Authority
2424 Piedmont Road, N.E.
Atlanta, Georgia 30324-3330

RE: Atlanta Beltline: 22 Mile Loop
Fulton County, Georgia
HP-080729-001

Dear Mr. Ukwa:

The Historic Preservation Division (HPD) has reviewed the revised report entitled *Historic Resources Survey of the Proposed BeltLine Corridor Northeast Quadrant*, dated February 2009, by AECOM/JJG Joint Venture and Edwards-Pitman Environmental, Inc. Our comments are offered to assist state agencies and their applicants in complying with the provisions of the Georgia Environmental Policy Act (GEPA).

Thank you for submitting the revised report. Based on this report, HPD concurs with all recommendations regarding Georgia Register of Historic Places (GRHP) eligibility for historic structures located in the proposed project's area of potential effects (APE) in the northeast quadrant of the Beltline project. HPD notes, for the record, that the Martin Luther King, Jr., Historic District is a National Historic Landmark and is located in the proposed project's APE. We look forward to reviewing the assessment of effects document as it becomes available.

Please refer to project number **HP-080729-001** in any future correspondence regarding this undertaking. If we may be of further assistance, please do not hesitate to contact Elizabeth Shirk, Environmental Review Coordinator, at (404) 651-6624, or Jackie Tyson, Environmental Review Historian, at (404) 651-6777.

Sincerely,

Karen Anderson-Córdova
Manager, Planning & Local Assistance Unit

KAC:jht

cc: Alan Tabachnick, AECOM, 516 E. State St., Trenton, NJ 08609
Le'Var Rice, ARC
Doug Young, AUDC
Boyd Coons, APC
Jody Cook, NPS

Page Left Blank