

Environmental Memorandum

Streetcar East Extension

June 2020

Task Order: 2020-18-CPFP-Streetcar East LRT

TABLE OF CONTENTS

1. ENVIRONMENTAL DOCUMENTATION OVERVIEW 4

2. REVIEW OF ENVIRONMENTAL DOCUMENTATION AND STUDIES 4

2.1 Atlanta BeltLine: Environmental Effects Report (2009)5

2.2 Atlanta BeltLine: Tier 1 Environmental Impact Statement (2012)7

2.3 Atlanta BeltLine East: Draft Environmental Assessment Annotated Outline (2016)9

2.4 Atlanta BeltLine East: Draft Categorical Exclusion (2016) 13

2.5 Atlanta BeltLine East: Historic Resources Survey Report (2018) 13

3. HISTORICAL ASSESSMENT 15

4. FUNDING IMPLICATIONS AND NEXT STEPS 17

4.1 Local Funds 17

4.2 State or Federal Funds..... 18

4.3 Next Steps 18

APPENDIX 20

TABLE OF EXHIBITS

Exhibit 2-1: Environmental Reviews to Date..... 4

Exhibit 2-2: Detail of Atlanta BeltLine Environmental Effects Report Study Area (2009) 6

Exhibit 2-3: Detail of Atlanta BeltLine Environmental Impact Statement Study Area (2012) 8

Exhibit 2-4: Detail of Atlanta BeltLine East Environmental Assessment (2016)..... 10

Exhibit 3-1: Historic Districts in Study Area 17

Exhibit A-1: NEPA Process Overview 21

Exhibit A-2: GEPA Process Overview 22

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1. Environmental Documentation Overview

Prior to the passage of the 2016 More MARTA sales tax in the City of Atlanta, the Streetcar East Extension Project was under development by the Atlanta BeltLine Inc. (ABI) (on behalf of the City of Atlanta) as part of implementing the larger Streetcar System Plan and transit along the BeltLine Corridor. Without a dedicated local funding source, this project was progressing with the assumption of federal funds as part of its financing strategy. ABI planning and design work was coordinated with the Federal Transit Administration (FTA) and documents were produced under the assumption of meeting requirements under the National Environmental Policy Act (NEPA).

With the passage of the 2016 More MARTA sales tax and inclusion of the Streetcar East Extension Project in the MARTA 2040 City of Atlanta Expansion Program, this project was designated for delivery by MARTA with ABI and the City of Atlanta as key stakeholders assuming 100% local funding.

This document provides an overview of the environmental body of work completed to date by ABI, summarizes findings, and identifies implications in coordination with the recommended alignment and change in funding assumption. This includes all studies completed by ABI that include any portion of the identified Streetcar East Extension project. Some of these studies include work on other alignments or further extensions of light rail beyond the scope of this project, but the focus of this memo is specifically on segments that overlap between the Streetcar East Extension project and these previous studies.

2. Review of Environmental Documentation and Studies

This section provides an overview of each environmental document prepared that include segments of the Streetcar East Extension project. This includes work performed under the project's title as the Northeast Zone of the Atlanta BeltLine transit rail alignment, and as the preferred transit alignment for the Atlanta BeltLine East project. The Streetcar East Extension project has had multiple environmental evaluations in some shape or form. Exhibit 2-1 summarizes past documents and their status. Additionally, the following sections provide details on each environmental document.

EXHIBIT 2-1: ENVIRONMENTAL REVIEWS TO DATE

Year	Document Type	Entity	Status
2009	Environmental Effects Report	MARTA, Atlanta BeltLine, Inc.	Completed, out of date.
2012	Tier 1 Final Environmental Impact Statement	MARTA, Atlanta BeltLine, Inc.	Completed with Tier 1 ROD. No Tier 2 NEPA process. Out of date.
2016	Draft Environmental Assessment Annotated Outline	City of Atlanta, Atlanta BeltLine, Inc., Invest Atlanta	Incomplete, no FONSI. Recommended reduce scope and develop CE.
2016	Draft Categorical Exclusion	Atlanta BeltLine, Inc.	Incomplete, only CE worksheet prepared. No full report or FTA concurrence.

Year	Document Type	Entity	Status
2018	Historic Resources Survey Report	City of Atlanta, Atlanta BeltLine, Inc., Invest Atlanta	SHPO concurrence with NRHP eligible resources.

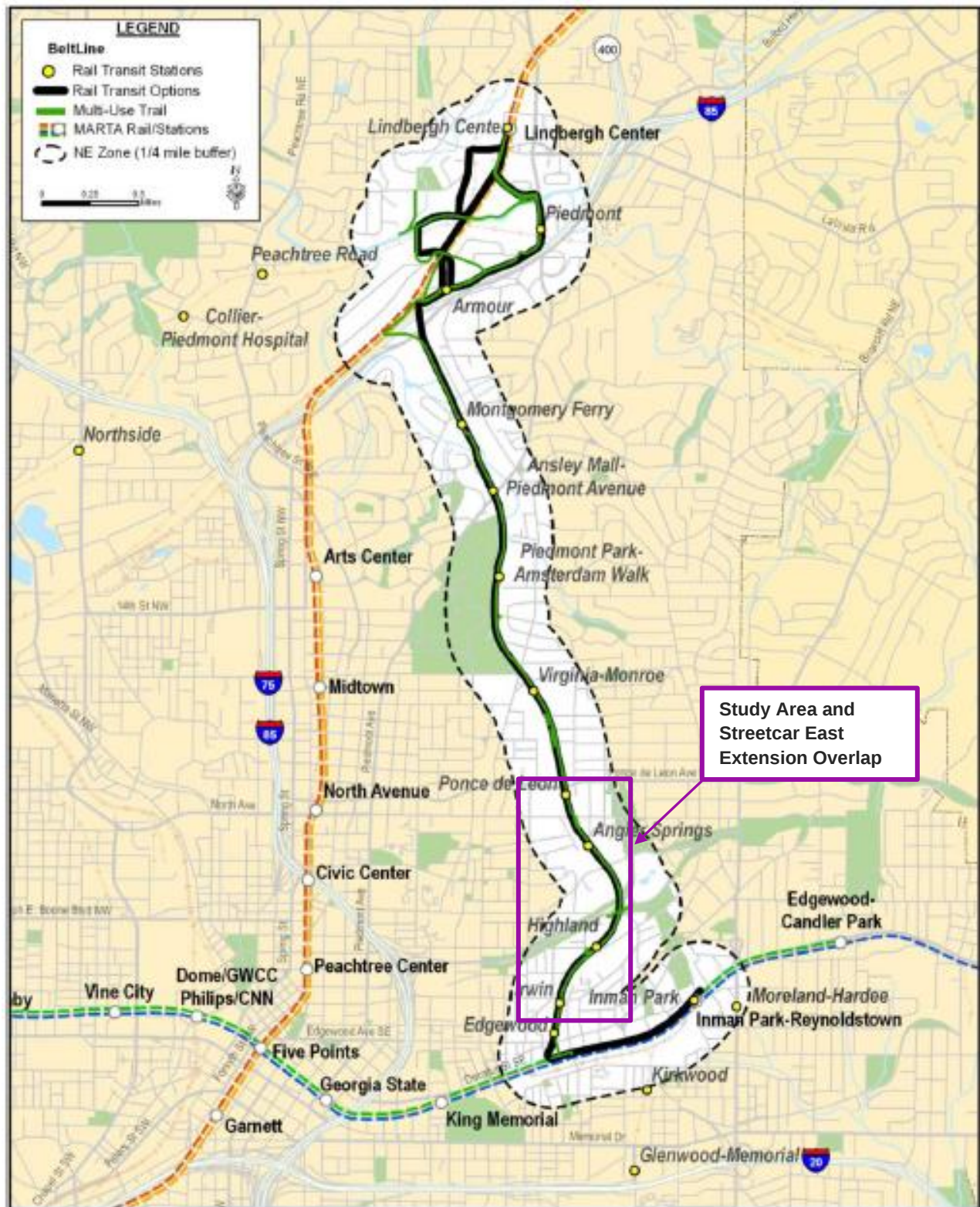
2.1 Atlanta BeltLine: Environmental Effects Report (2009)

In 2009, an Environmental Effects Report (2009 EER) was prepared under GEPA for the BeltLine Corridor Northeast Zone.¹ This document was prepared concurrently with a NEPA Tier 1 EIS (2012 Tier 1 FEIS) for ABI (see Section 2.2). Along with the 2012 Tier 1 FIES, the 2009 EER assessed right-of-way needs, alternative alignments, and the preferred rail technology. As part of the process, MARTA and ABI coordinated with agencies and the public to assess potential impacts of the preferred alignment.

It is important to note that this report only overlaps with the Streetcar East Extension project along the BeltLine corridor. At the time of this study, the focus was on providing transit around the BeltLine Corridor without consideration for internal east-west and north-south connectivity. Therefore, this does not include any in-street sections of the Streetcar East Extension. It was concluded that the sections of the BeltLine Corridor between Irwin Street and Ponce de Leon Avenue would have minimal environmental impacts to the resources in the proximity of the Streetcar East Extension, with the largest impacts being erosion control during construction.

¹ BeltLine Corridor Northeast Zone Final Decision Document. (August 2009). Metropolitan Atlanta Rapid Transit Authority and Atlanta BeltLine, Inc.

EXHIBIT 2-2: DETAIL OF ATLANTA BELTLINE ENVIRONMENTAL EFFECTS REPORT STUDY AREA (2009)



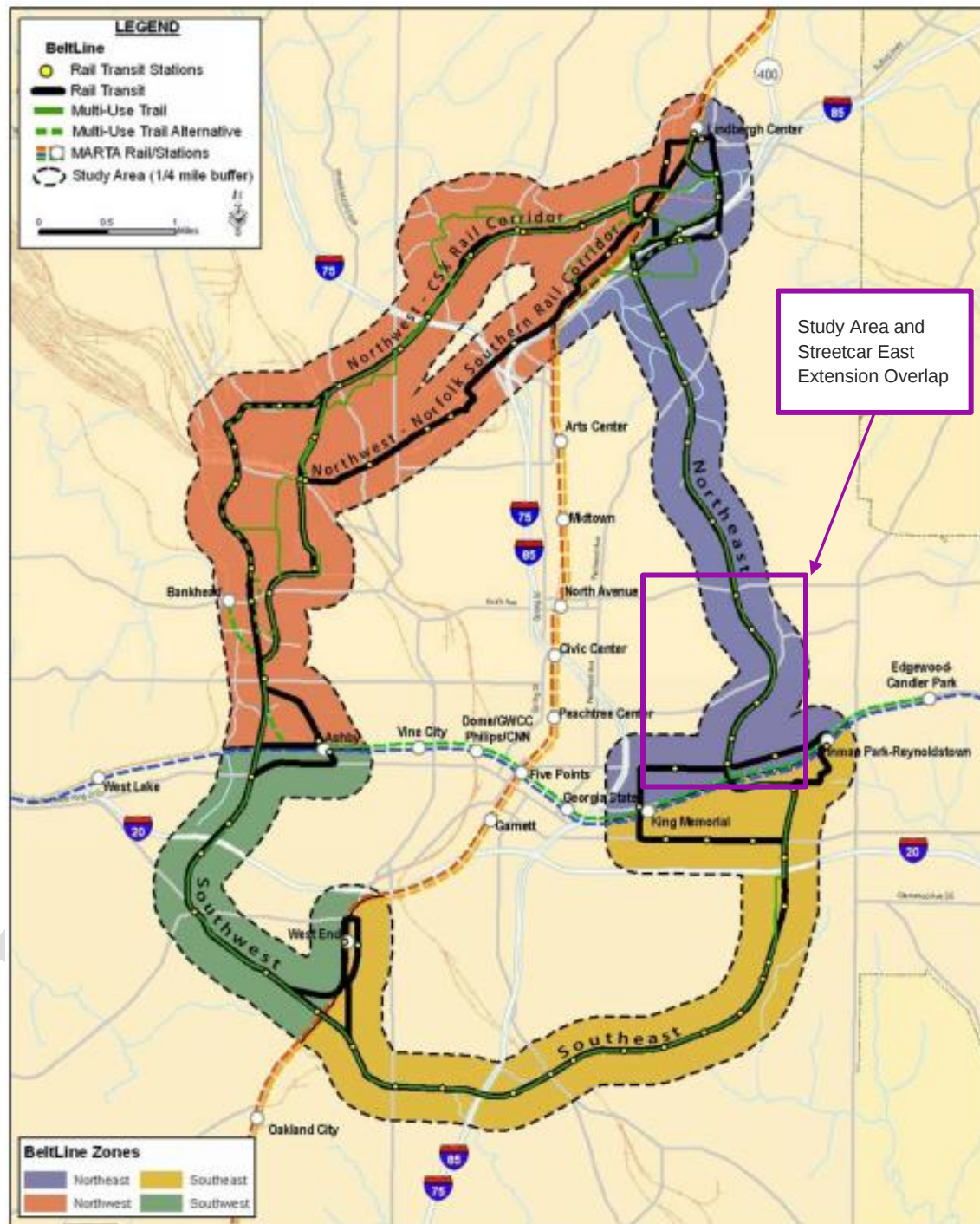
2.2 Atlanta BeltLine: Tier 1 Environmental Impact Statement (2012)

A NEPA Tier 1 EIS was prepared by the FTA for ABI in cooperation with MARTA and the City of Atlanta to provide new transit and multi-use trails in the study area, as a means to improving residents' and workers' access and mobility. A tiered EIS allowed FTA and ABI to establish right of way needs and select a transit technology as well as general alignments.

The Tier 1 Draft EIS (DEIS) analyzed a No-Build alternative baseline and ten build alternatives for the entire 22-mile BeltLine corridor loop, which included the eastern segment of the current Streetcar East Extension project along the BeltLine Corridor and some in-street sections along Edgewood Avenue. The DEIS also evaluated mode alternatives including Light Rail Transit (LRT) and Modern Streetcar, which were previously identified in an initial screening analysis completed by MARTA in 2007. Through additional analysis and with community input MARTA determined that streetcar was the preferred mode for the BeltLine. In addition to benefits in cost and alignment flexibility, the streetcar mode was also determined to have fewer environmental impacts to land use and noise-sensitive sites and garnered community support.

A Tier 1 Final EIS (FEIS) was prepared, which identified the preferred alternative, and a Record of Decision was filed in August 2012. The Tier 1 decisions included the selection of either streetcar or LRT, selection of a general alignment of new transit and trails, and establishment of right-of-way needs. While this report provides useful information along the BeltLine Corridor, it is out of date and would require recollection of data analyzed and updated data.

EXHIBIT 2-3: DETAIL OF ATLANTA BELTLINE ENVIRONMENTAL IMPACT STATEMENT STUDY AREA (2012)



2.3 Atlanta BeltLine East: Draft Environmental Assessment Annotated Outline (2016)

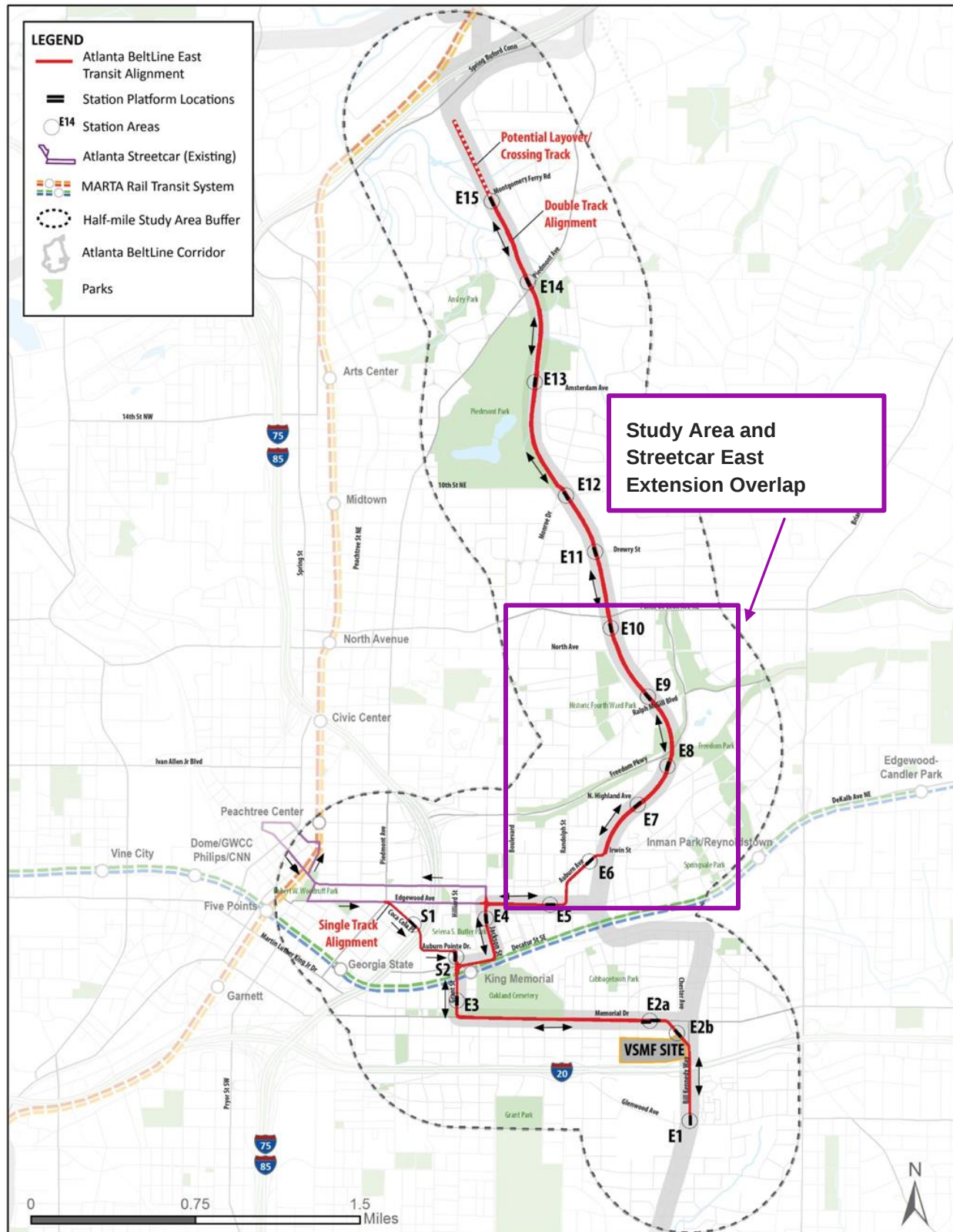
Pursuant to NEPA, the FTA and the City of Atlanta, along with its partners ABI and Invest Atlanta, drafted an annotated outline of a Draft Environmental Assessment (DEA) for Atlanta BeltLine East in 2016. Unlike previous reports, this included the in-street section of the Streetcar East Extension. The DEA annotated outline followed the 2012 Tier 1 FEIS (See Section 3.2.2). This document was not finalized, never circulated for approval with FTA, and a Finding of No Significant Impact (FONSI) was not put forth for consideration. Considering this document's status, it should be noted that the preferred alternative analyzed within the document does not have federal clearance if federal funds are ultimately utilized.

The 2016 DEA annotated outline evaluates the environmental effects of No-Build and Build alternatives with a 2023 open year and a 2040 design year. The No-Build scenario included projects that would be implemented by others regardless of the selected build alternative.

The Build Alternative included most of the alignment evaluated in the Atlanta BeltLine Tier 1 EIS, as well as additional in-street segments for connection to the Downtown Streetcar. This alignment includes previous portions of the corridor stretching from Montgomery Ferry Road to Glenwood Avenue and the portion of the Inman Park-Reynoldstown and King Memorial Connectivity Area that is served by the alignment's connection to King Memorial station. Additional alignment segments included the stretch along Coca Cola Place and Auburn Pointe Drive between the existing Streetcar alignment. The alignment included in the DEA for the in-street section is different than the recommendation made in the Alignment Recommendation Report. The EA annotated outline alignment was also more extensive and included connections south of Edgewood Avenue and to the southwest section of the BeltLine, as well as continued north of Ponce de Leon Avenue, the northern terminus of the Streetcar East Extension Project.

It is important to note that while this is the most recent environmental document, it is more than three years old and will require an update should federal funds be used. It is summarized here to give the most recent update regarding environmental items found by ABI.

EXHIBIT 2-4: DETAIL OF ATLANTA BELTLINE EAST ENVIRONMENTAL ASSESSMENT (2016)



While many environmental resources within the draft EA's study area were evaluated, not all resources were gauged to have potential impacts or associated mitigation efforts. Affected environmental resources found to be pertinent to the study area include transportation, land use, socioeconomics, land acquisitions, environmental justice (EJ), neighborhoods and community resources, cultural resources, Section 4(f), visual resources, water resources, hazardous materials, safety and security, construction-related impacts, and cumulative effects. Environmental resources categorized as "No Concern" within the DEA include farmlands, wetlands, navigable waterways, coastal zones, air quality, noise- and vibration-sensitive sites, endangered species, Section 6(f), energy resources, visual/aesthetic resources, wildlife refuges, soils and geologic resources.

Potentially impacted environmental resources identified in the 2016 DEA are summarized below.

2.3.1 Land

In its land use evaluation, the DEA analyzed existing zoning and land use, as well as future land use. Existing land use was categorized as largely urbanized, comprised of residential, office/retail, industrial, institutional, parks/open space, and transportation-related land uses. Existing zoning was categorized as planned mixed-use, industrial, residential, commercial, retail, and institutional or community zoning. Historically and culturally significant neighborhoods were identified within the study area. Future land use was categorized as transportation/communication/utilities, open space, commercial, industrial, and low-density and medium-density residential.

2.3.2 Environmental Justice

In its EJ evaluation, the DEA identified approximately 38 percent of the study area population as minority and 18 percent as low-income. The study area was determined to have a lower percentage of minority and low-income population than the City of Atlanta and Fulton County. The average median household income of the study area was determined to be \$70,020, higher than the median household income for the City of Atlanta and Fulton County. The DEA concluded that the Build Alternative would not have disproportionately high and adverse effects on EJ populations, but also stressed the importance of public outreach to EJ communities. This was for the entire study area, beyond the limits of Streetcar East Extension.

2.3.3 History

Under Section 106, an adverse effect occurs when a project may directly or indirectly diminish the integrity of a historic property by altering any of the characteristics that qualify that property for inclusion in the NRHP.

In its evaluation of Cultural Resources, the DEA determined a finding of No Effect for 28 resources: 11 historic districts, 2 parks, 1 cemetery, 1 railroad, and 13 other individual resources. The DEA determined a finding of No Adverse Effect for the Historic Railroad Resources of the Atlanta BeltLine Northeast Quadrant, Martin Luther King Jr. Historic District, and the Memorial Drive Corridor. These results are beneficial for the Streetcar East Extension as the alignment is along the Northeast Quadrant of the BeltLine. Of particular note, the recommended in-street alignment for Streetcar East runs through the Martin Luther King Jr. Historic District. In the DEA, effects were not considered adverse so long as

they did not require ROW from the historic properties, affect historic trees, affect contributing buildings within the district, or alter the residential or commercial use of properties within the district.

2.3.4 Archaeology

The DEA's Phase I archaeological survey identified 13 previously recorded archaeological sites were present within 0.6 miles of the survey area. The Phase I survey did not identify any archaeological sites within the APE, defined as the DEA's proposed Streetcar alignment, easements, right-of-way, and station locations. It did, however, note that historic streetcar rails may exist below modern paved surfaces within the study area, consistent with the streets recommended for the Streetcar East Extension.

2.3.5 Water

Four perennial streams and two intermittent streams were identified within the study area of the DEA, though all were north of the Streetcar East Extension study area.

The only area with flood potential identified was south of the Streetcar East Extension study area.

2.3.6 Urban Forestry

Under the Build Alternative, overall effects to Urban Forestry were found to be minor.

2.3.7 Hazardous Materials

In its hazardous materials screening, the DEA identified multiple sites within 500 feet of the proposed streetcar alignment regulated by the EPA and GA EPD for hazardous materials activities: 37 Resource Conservation and Recovery Act (RCRA) sites, 36 Underground Storage Tank (UST) sites, 36 Georgia brownfield sites, 25 Leaking Underground Storage Tank (LUST) sites, and 2 EPA brownfield sites.

Of these, only three were located within the study area for the Streetcar East Extension, listed below:

- BeltLine tract located near Ponce City Market - This site is already under the control of the entities involved with this Project, contaminants of concern and the extent of the contamination has already been identified, and cleanup is complete. Remedial actions and redevelopment should occur as stated in the CAP.
- 755 North Avenue - This site is listed in the GA EPD Brownfield Properties database as a Non-HSI property indicating that soil and/or groundwater contamination was reported at the property, but the hazardous evaluation score of the facility/property did not exceed the threshold levels for sites posing an imminent threat to health of the environment.
- 544 North Angier Avenue - This site is listed in the GA EPD Brownfield Properties database as a Non-HSI property indicating that soil and/or groundwater contamination was reported at the property, but the hazardous evaluation score of the facility/property did not exceed the threshold levels for sites posing an imminent threat to health of the environment.

2.3.8 Section 4(f)

Section 4(f) of the United States Department of Transportation (USDOT) Act of 1966 refers to transportation projects requiring the use of publicly owned land from a public park, recreation area, wildlife refuge of local, state, or national significance, or land from an historic site of local, state, or national significance. The Secretary of Transportation may approve a project with these criteria only if there is no prudent or feasible alternative to the use of the land, and the project has included all possible measures to minimize harm to the park, recreation area, refuge, or historic site resulting from the use. Through the master planning process completed by ABI, new parks were envisioned directly adjacent to the transit project with the intent to integrate city infrastructure with public greenspace. While the DEA's Section 4(f) analysis determined that the project would require land acquisitions, none would occur from property classified as parkland by the jurisdictional body of parks within the study area, the City of Atlanta Department of Parks and Recreation. Twenty-six historic districts or historic properties, either listed on the NRHP or eligible for listing, were concluded to also be Section 4(f) resources.

2.3.9 Public Involvement

Agency coordination and public involvement efforts both took place during the development of the Atlanta BeltLine East project and during the preparation of the DEA. Agency coordination was fulfilled through data collection and requests for input and consultation with agencies. A Technical Advisory Committee (TAC) and Stakeholder Advisory Committee (SAC) were both formed. These groups were comprised of agency members holding jurisdiction inside the study area, as well as technical experts from local agencies and public groups. The ABI and the FTA collaborated on this annotated outline of the EA. Through coordination, it was recommended that if the scope was reduced and the identified areas of highest impact were removed, the DEA could be downgraded to a CE.

2.4 Atlanta BeltLine East: Draft Categorical Exclusion (2016)

Changes in project alignment and reduction in scope led to the preparation of the Atlanta BeltLine East Categorical Exclusion (CE) in 2016. A CE is a simpler administrative approval done for actions that do not individually or cumulatively have a significant effect on the human environment and that do not rise to the level of an EA or EIS. Sections of the BeltLine south of Irwin Street and north of Ponce de Leon Avenue were removed from the alignment, and were the sections where the majority of the environmental items identified were located, to justify a reduction in the level of environmental review. A CE worksheet was prepared communicated to FTA in June 2016, but the document was not formally submitted. Preparation of a full CE report was halted following coordination with FTA regarding funding considerations and passage of the 2016 More MARTA sales tax.

2.5 Atlanta BeltLine East: Historic Resources Survey Report (2018)

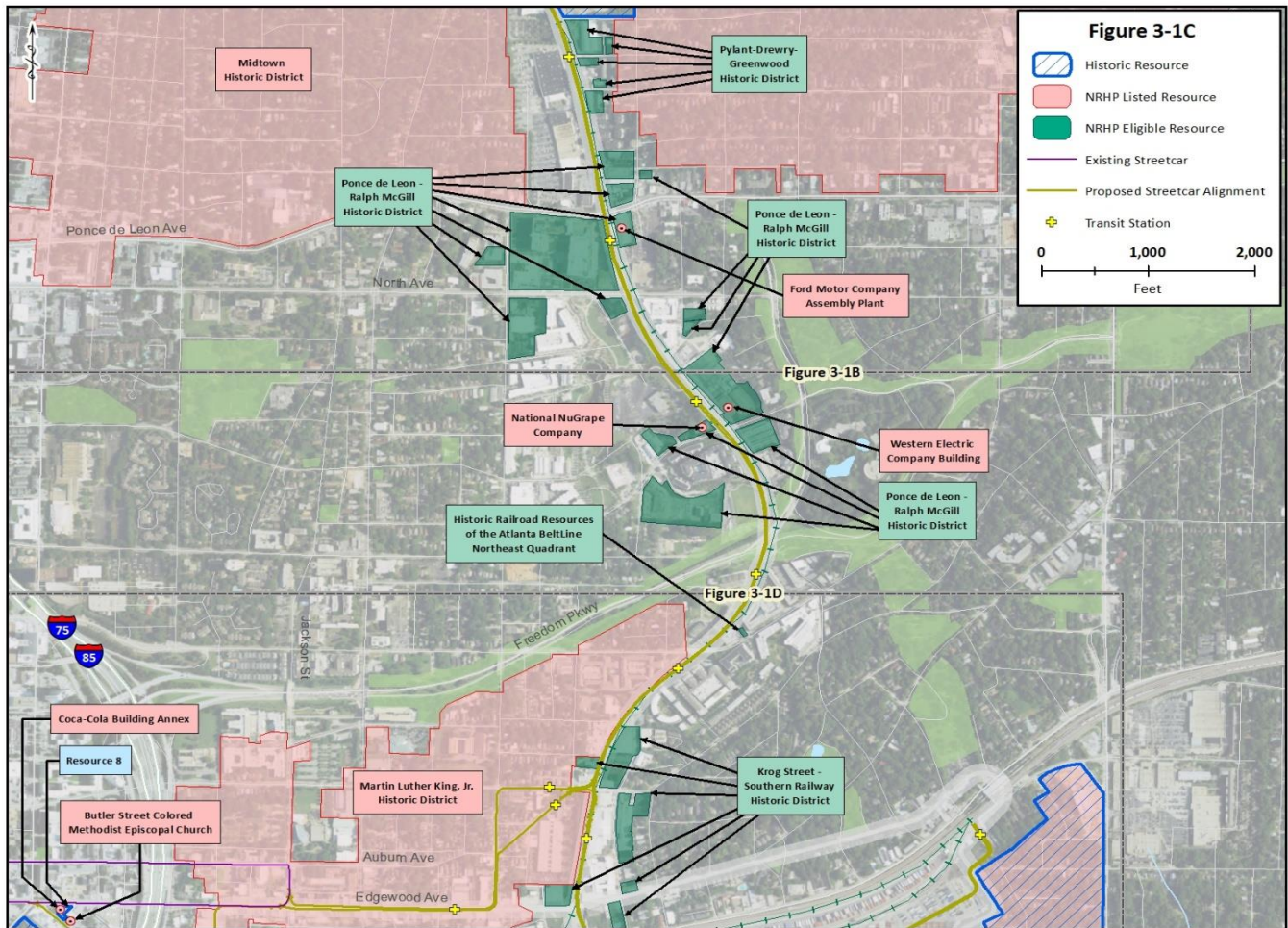
In 2018, under the assumption federal funding was still a possibility, a Historic Resources Survey Report (HRSR) was prepared for the "Atlanta BeltLine East Streetcar" in compliance with Section 106 of the National Historic Preservation Act (NHPA). In contrast to the Cultural Resources evaluations in

previous environmental documentation, this document solely identified historic properties and districts that were listed or eligible for listing in the NRHP.

The HRSR determined that seventeen NRHP-listed resources and seven NRHP-eligible resources were located within the APE for the project. Additionally, thirteen other properties aged 45 years or older were identified within the APE. This is important because federally funded transportation projects are protected under Section 106 of the Historic Preservation Act and Section 4(f) of the Department of Transportation Act. Both sections require consideration of alternatives to taking land from historic properties.

Shown in Exhibit 2-5, The proposed Streetcar East Extension alignment is within one NRHP listed resource area and between two sites that are NRHP eligible. The mixed-traffic portions, including both the extended couplet and double tracking options, are in the Martin Luther King Jr. Historic District, which is a national historic landmark and congressionally protected. The BeltLine (dedicated ROW) portion of the Streetcar East Extension alignment from Irwin St to Highland Ave runs parallel to the eastern border of the MLK Jr. Historic District boundary. While the alignment in that section would not be located within the MLK JR. Historic District boundary, it is important to note due to potential overlapping during construction of the East Extension. Additionally, the alignment along the BeltLine (dedicated ROW) from Freedom Pkwy to Ponce City Market travels between multiple NRHP eligible sites. The sites, shown below, are all parallel to the potential Ponce de Leon – Ralph McGill Historic District. While these areas are currently only eligible and do not present any immediate concerns to the project, it could require additional surveys, coordination and documentation in the future if the sites were to be officially listed.

EXHIBIT 2-5: DETAIL OF ATLANTA BELTLINE EAST ENVIRONMENTAL ASSESSMENT (2016)



3. Historical Assessment

Alignments under current consideration for Streetcar East Extension utilize either Auburn Avenue, Edgewood Avenue, or both. Alignment options utilizing Edgewood Avenue cross through the MLK Jr. National Historical Park boundary from Jackson Street to Howell Street. Options utilizing Auburn Avenue cross this area from Bradley Street to Jackson Street. Additionally, all alignment options fall within several historic designated areas. See Exhibit 3-1 for current alignment options and their relationship to historic designated areas associated with the MLK Jr. National Historical Park.

The Streetcar East Extension alignments under consideration interact with six historic designated areas:

- City of Atlanta MLK Jr. Historic District
- City of Atlanta MLK Jr. Landmark District
- Congressionally designated MLK Jr. Preservation District

- MLK Jr. National Register Historic District
- MLK Jr. National Historic Landmark District
- MLK Jr. National Historical Park

The City of Atlanta MLK Jr. Landmark District specifically encourages “the use of the Atlanta Streetcar, MARTA and other public transit facilities.”² The MLK Jr. National Historical Park, which includes Ebenezer Baptist Church, the MLK Jr. Birth Home, and Historic Fire Station #6 is federally owned and managed.

The following information and agencies are considered necessary to identifying the Streetcar East Extension’s potential impacts on historic designated areas and the MLK Jr. National Historical Park:

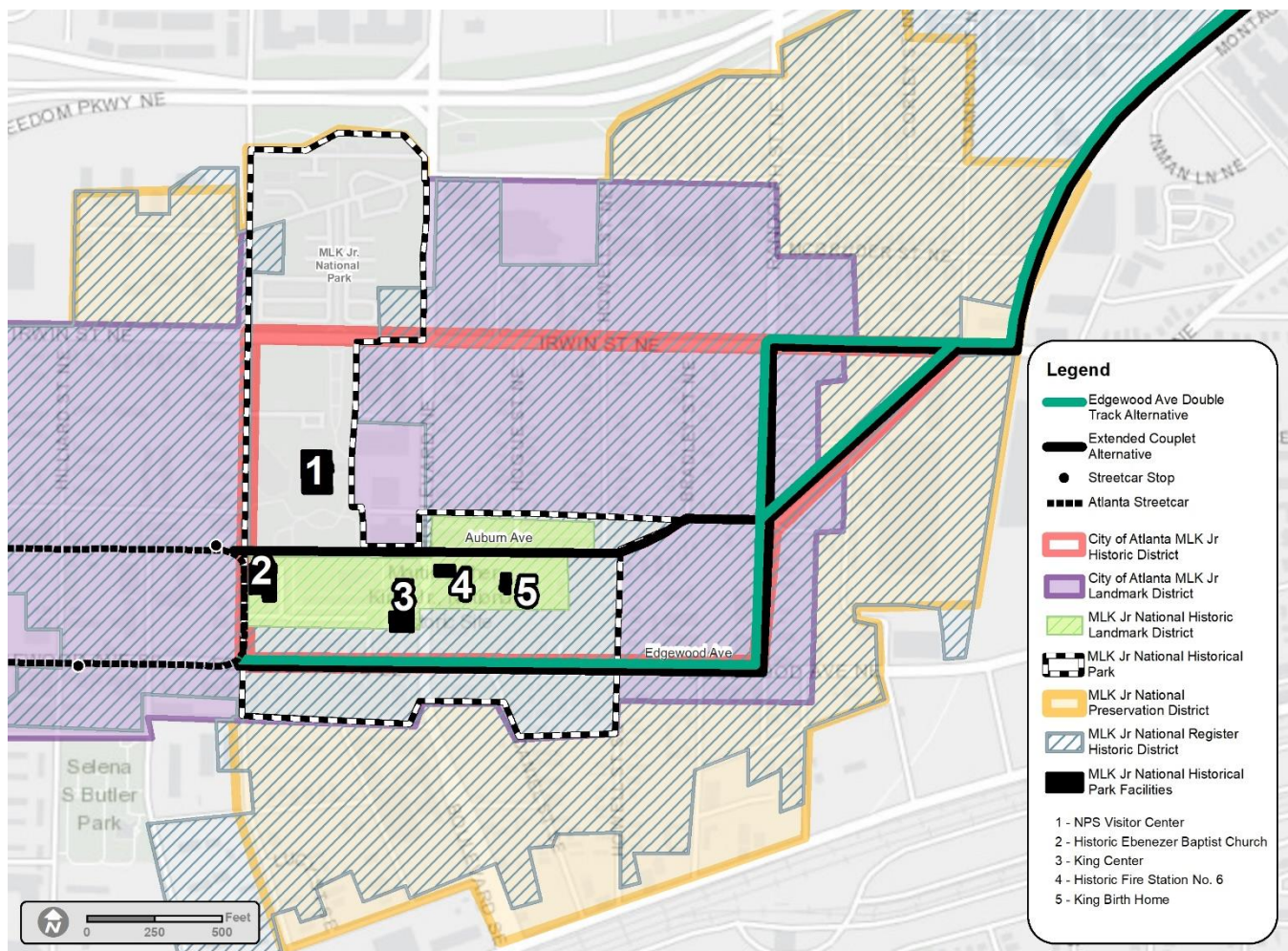
- Previous studies and environmental documentation for the existing Atlanta Streetcar
- Contact with the Atlanta Urban Design Commission (AUDC)
- Contact with the National Park Service (NPS) Southeast Regional Office
- Contact with the City of Atlanta Planning Department

The original Streetcar route exists within the City of Atlanta Sweet Auburn Historic District, the City of Atlanta MLK Jr. Landmark District, the Sweet Auburn National Historic Landmark District, and the Congressionally-designated MLK Jr. Preservation District. Analyzing documentation and funding details from that project would provide guidance for moving forward with the Streetcar East Extension.

The possibility exists that the City of Atlanta MLK Jr. Historic District was made null by the creation of the National Historical Park. The AUDC would need to be contacted for that information. The AUDC could likely provide information for any funding questions related to the city-designated districts as well. Contact with the NPS Southeast Regional Office would be needed for background information on the National Historical Park and coordination with the Atlanta Planning Department would help verify the presence of preservation overlays in the area.

² City of Atlanta Municipal Code Chapter 20C. – Martin Luther King Jr Landmark District [16], Sec. 16-20C.001. - Statement of intent, #12 (Ord. No. 2014-21(14-O-1118), § 1(Attach. A), 6-11-14)

EXHIBIT 3-1: HISTORIC DISTRICTS IN STUDE AREA



4. Funding Implications and Next Steps

While the Streetcar East Extension project has fallen within the study areas for multiple environmental evaluations over the years, many of these environmental documents reached stopping points following questions of funding. The next steps for environmental documentation will depend entirely on the project's funding source, currently assumed to be 100% local.

4.1 Local Funds

Local funding (2016 More MARTA sales tax revenues) would require the project team to conduct an environmental evaluation at a less intensive scale compared to the documents required by state and federal standards. This environmental evaluation would take the form of a Resource Identification screening, effectively culminating in the Socioeconomic and Environmental sections of an Existing Conditions Report. The preparation of this report would not require concurrence from state or federal agencies, so long as properties owned by state and/or federal agencies are not impacted. However, coordination with these agencies is recommended. Public engagement in line with MARTA guidelines

for the MARTA 2040 program and the inter-governmental agreement between MARTA and COA/ABI will also be required.

4.2 State or Federal Funds

Should state funds over \$100M or any amount of federal funds be utilized, the GEPA or NEPA process, respectively, must move into the resource identification and early coordination stage by notifying agencies and key stakeholders that environmental studies are beginning. The following provides a brief outline of follow-up coordination.

- Ecology, history, archaeology, and NEPA specialists will begin their special studies and surveys in the field and submit the survey reports to any required agencies for approval. Surveys and survey reports prepared for previous environmental analyses would need to be re-surveyed and re-analyzed as needed to bring them up to date.
- If determined an EIS would be needed to complete the NEPA process, a formal request must be prepared and then sent to the FTA for consideration and a class of action decision. This request can take up to 45 days for a response.
- If state or federal funds are used, surveys and survey reports that are over five years old or have not received agency concurrence would need to be re-surveyed and the reports addended. This rule applies throughout the entire life of the project. Given the fact that agency concurrence was never received for the 2016 DEA or the DCE, full environmental surveys would be recommended for this project. Based on coordination to date between ABI and FTA, this project would require a CE. Should this change and new leadership requires an EA or EIS, a more thorough analysis of indirect and cumulative effects (ICE) may be required.
- A Public Information Open House (PIOH) to update the public on the current status of project studies and alternatives would be conducted. The project may also require a public hearing for an EIS and one may be held for an EA. A public hearing to gather comments would be advisable if MARTA feels the need to gather additional public comments on the project and the environmental analysis.
- GEPA/NEPA must be complete prior to right of way (ROW) authorization. If additional changes are made during final design, the changes would be assessed to determine if additional environmental review in the form of a formal re-evaluation would be required, or if filing a simple no change memo would be appropriate. Updated special studies may also be required depending on the changes.

Details regarding the GEPA/NEPA processes can be seen in the appendix.

4.3 Next Steps

This review of environmental documents and coordination with the alignment recommendation was completed without coordination with agencies outside MARTA. With the alignment recommendation and commitment of 100% local funds, the next steps to progress the project with regards to environmental requirements are to:

- Confirm assumptions of requirements with City of Atlanta and FTA

- Conduct an environmental resource screening for inclusion in existing conditions analyses.
- Initiate early design and conduct special studies to confirm no property impacts to historic sites and quantify other impacts such as private right of way, traffic, and parking.
- Coordinate with adjacent property owners, particularly:
 - National Park Service
 - King Memorial
 - Historic Ebenezer Baptist Church

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APPENDIX

This appendix provides an overview of the processes for environmental activities should the project be delivered with federal and/or state funds.

National Environmental Policy Act

NEPA³ integrates environmental considerations into projects receiving Federal funding by requiring agencies to:

- Examine the potential impacts of proposed actions on the environment;
- Analyze reasonable alternatives to the proposed action;
- Initiate coordination with agencies possessing environmental expertise; and
- Provide the opportunity for public input on the proposed action.

NEPA also mandates that agencies disclose the findings of environmental evaluations in an environmental document. This environmental document falls into one of three classes of action:

- An Environmental Impact Statement (EIS) is prepared for projects whose environmental impact is known and determined to be significant. The completion of an EIS results in the Federal Transit Administration (FTA) signing a Record of Decision (ROD).
- An Environmental Assessment (EA) is prepared for projects whose environmental impact is not clearly defined. If an EA results in the identification of significant impacts, the class of action is escalated to an EIS. Otherwise, a Finding of No Significant Impact (FONSI) is issued.
- A Categorical Exclusion (CE) is prepared for projects that are determined to not have a significant impact on the environment.

Exhibit 3.1 provides a detailed overview of the steps in the NEPA process.

Georgia Environmental Policy Act

If state funds are utilized and these funds exceed \$100M, the project would need to adhere to the state's GEPA⁴ guidelines. Similar to NEPA, an environmental document (an Environmental Effects Report or EER) would be written based on special studies evaluations and effects. Some initiation and approval with state and federal agencies may still be required; however, there would be no FTA involvement needed for overall approval of the GEPA document prior to ROW authorization. It should be noted that if the project also leverages federal funds and completes a NEPA document, the GEPA process is satisfied. Exhibit 3.2 shows the steps involved in the GEPA process.

³ <https://www.transit.dot.gov/regulations-and-guidance/environmental-programs/national-environmental-policy-act>

⁴ https://esd.uga.edu/sites/default/files/gepa_guidelines.pdf

EXHIBIT A-1: NEPA PROCESS OVERVIEW

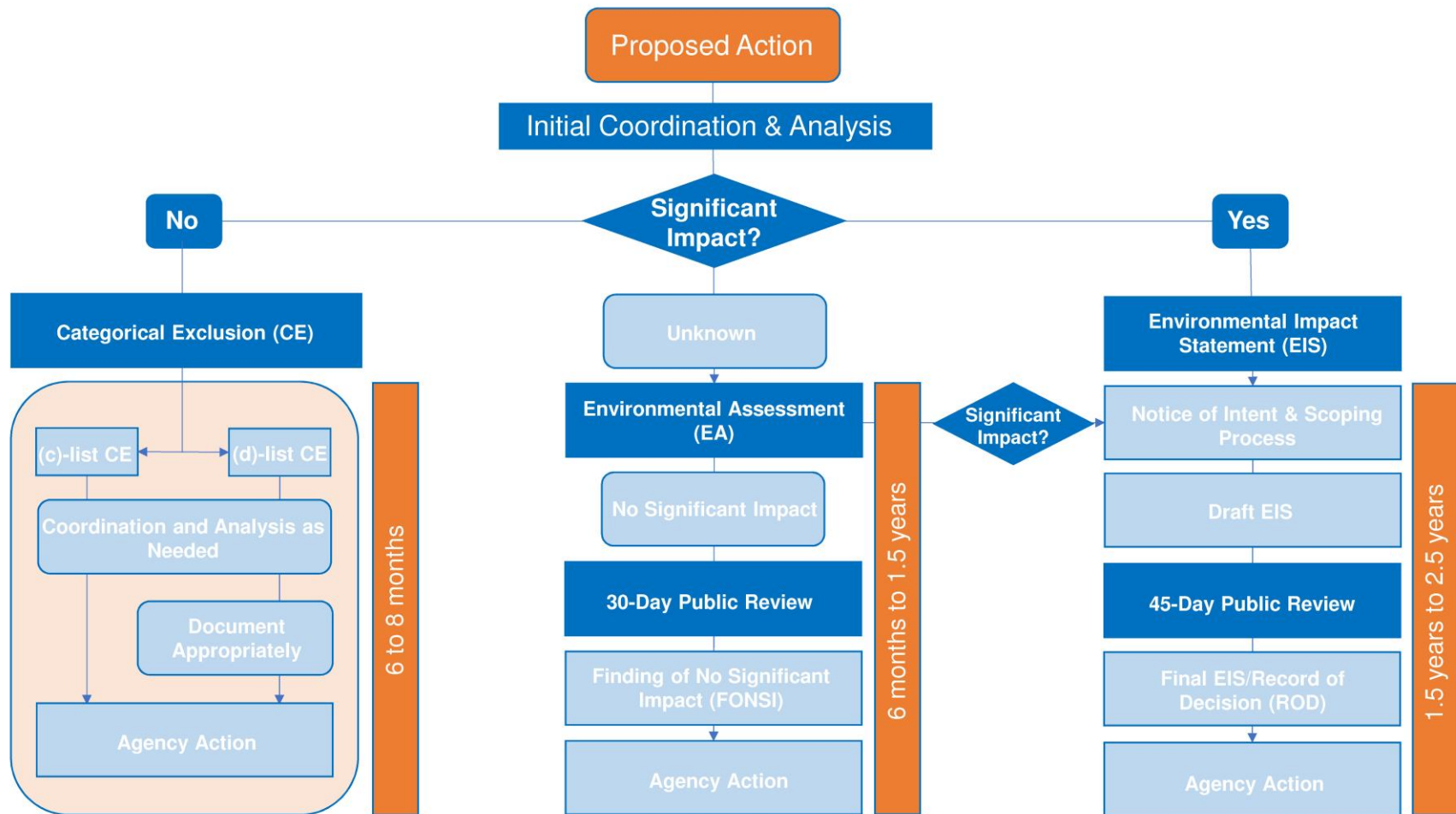


EXHIBIT A-2: GEPA PROCESS OVERVIEW

