



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

November 15, 2016

Mr. John Winkle  
Department of Transportation  
Federal Railroad Administration  
1200 New Jersey Avenue, SE  
Washington DC 20590

Re: Tier 1 Environmental Impact Statement for the Atlanta to Chattanooga High Speed Ground Transportation Project, Georgia and Tennessee; CEQ# 20160226

Dear Mr. Winkle:

Pursuant to Section 309 of the Clean Air Act (CAA) and Section 102(2)(C) of the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) reviewed the Draft Environmental Impact Statement (DEIS) for the Tier 1 Environmental Impact Statement for the Atlanta to Chattanooga High Speed Ground Transportation (HSGT) Project, developed by the Federal Railroad Administration (FRA), Georgia Department of Transportation (GDOT) and Tennessee Department of Transportation (TDOT) or "Project Team". On June 10, 2010, the GDOT requested that the EPA act as participating agency in the development of the DEIS and on July 9, 2010, we accepted the invitation. On October 4, 2010, the EPA provided a comment letter regarding the GDOT's "Technical Memorandum for Screening Methodology and Criteria", dated September 2010.

The stated purpose of the project is to enhance intercity mobility and economic growth throughout the Project Area between the metropolitan areas and the airports of Atlanta, Georgia, and Chattanooga, Tennessee, by providing faster and more reliable ground transportation service to the public as an alternative to highway, intercity bus, and air travel in a manner that is safe and cost-effective, while avoiding, minimizing, and mitigating impacts on the human and natural environment. This Tier 1 EIS is a program-level document, which is an EIS that is prepared when large geographic areas are being addressed for proposed improvements, allowing the project sponsor to review reasonable HSGT corridors, general environmental conditions, and potential impacts. This Tier 1 EIS considered 15 unique corridors extending from Hartsfield Jackson Atlanta International Airport (HJAIA) to downtown Chattanooga. The 15 corridors were subjected to a screening process as part of the development process for the corridors. Three (3) corridors were moved forward for further consideration, which are the I-75 Corridor, I-75/Rome Corridor and the Eastern Corridor. During the next phase of the NEPA process, the FRA plans to develop a Tier 2 EIS that will refine the evaluation to alignments within the Tier 1 Preferred Corridor Alternative and will then select a Preferred Alignment Alternative.

Overall, the EPA is generally supportive of the project and the FRA, GDOT and TDOT's efforts to address the region's transportation issues through intercity passenger rail. The EPA believes that passenger rail is potentially a more sustainable and greener approach to addressing the region's growing traffic congestion and could potentially reduce the region's air pollutants. However, the EPA is

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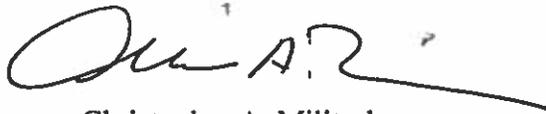
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concerned because of the lack of discussion regarding climate change and the project's impacts related to greenhouse gas emissions (GHG). The EPA notes that the Council of Environmental Quality's (CEQ) recently released guidance to address climate change and GHG emissions in NEPA documents entitled: "Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews" (August 1, 2016). Besides the climate change and GHG concerns, the EPA also has environmental concerns regarding air quality and cumulative effects that are discussed in the detailed comments (See enclosure).

The EPA notes that the FRA did not identify a Preferred Corridor Alternative in the DEIS, but will select a Preferred Corridor Alternative in the combined Tier 1 Final EIS (FEIS)/Record of Decision (ROD). Therefore, the EPA has rated all of the Action Alternatives within the DEIS as "EC-2", indicating that we have environmental concerns with all of the Action Alternatives with additional information requested for a final document. The EPA has rated the No Action Alternative as a "LO" indicating we have a general lack of objections.

The EPA appreciates the opportunity to provide comments on the proposed Atlanta to Chattanooga HSGT DEIS and looks forward to working with you to address our concerns. If you have any questions regarding our comments, please contact Ms. Jamie Higgins, of my staff, at (404) 562-9681, or by e-mail at [Higgins.jamie@epa.gov](mailto:Higgins.jamie@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Chris A. Militscher", with a long horizontal flourish extending to the right.

Christopher A. Militscher  
Chief, NEPA Program Office  
Resource Conservation and Restoration Division

Enclosure: EPA's Detailed Comments

**Enclosure**  
**EPA Detailed Comments**  
**Atlanta-Chattanooga High Speed Ground Transportation (HSGT) Project**  
**Tier 1 Draft Environmental Impact Statement (DEIS)**  
**CEQ No.: 20160226**

Alternatives

From our review of the Tier 1 DEIS, the three (3) corridors that were moved forward for further consideration are as follows:

- The I-75 Corridor Alternative is 128 miles and begins on the east side of HJAI A at the proposed HJAI A/Southern Crescent (HJAI A/SC) station, immediately adjacent to I-75, and follows I-75 to a point south of the proposed downtown Atlanta station. The corridor continues north underground through downtown Atlanta to I-75 north and uses the I-75 right-of-way (ROW) to the proposed Cumberland/Galleria station. It continues north along the I-75 ROW to the proposed Town Center, Cartersville, and Dalton stations. North of I-24 in Tennessee, the corridor continues along an existing CSX rail ROW to proposed stations at the Chattanooga Metropolitan Airport (CMA) and in downtown Chattanooga.
- The East Corridor Alternative is 139 miles and follows the same alignment as the I-75 corridor to the proposed Cartersville station. North of the Cartersville station, the corridor deviates from I-75 and continues along existing CSX ROW generally parallel to US 411, stops at the Dalton-Chatsworth and CMA stations, and continues to the proposed downtown Chattanooga station.
- The I-75/Rome Corridor Alternative is 150 miles and follows the same path as the I-75 and East corridors to the proposed Cartersville station. From the proposed Cartersville station, the corridor follows US 411 to Rome, continues north along an existing CSX rail ROW to rejoin I-75 between the proposed Cartersville and Dalton stations. The corridor continues north along the I-75 ROW to the proposed stations at Dalton and CMA and in downtown Chattanooga.

Specific Environmental Concerns

1. The EPA is concerned that there is no discussion in the DEIS regarding climate change either in terms of resiliency or potential impacts. The EPA notes the CEQ's recent guidance, "Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews" (August 1, 2016), which states:

*The analysis of climate change impacts should focus on those aspects of the human environment that are impacted by both the proposed action and climate change. Climate change can make a resource, ecosystem, human community, or structure more susceptible to many types of impacts and lessen its resilience to other environmental impacts apart from climate change. This increase in vulnerability can exacerbate the effects of the proposed action.*

The EPA also notes that there was no greenhouse gas analysis or discussion as outlined in the CEQ guidance (see below).

*As discussed in this guidance, when addressing climate change agencies should consider: (1) The potential effects of a proposed action on climate change as indicated by assessing GHG*

*emissions (e.g., to include, where applicable, carbon sequestration); and, (2) The effects of climate change on a proposed action and its environmental impacts (page 4).*

**Recommendation:** The EPA recommends GDOT/FRA provide a climate change analysis within the Final EIS that addresses the proposed project's impacts to the climate (i.e., GHG emissions) and any resiliency and adaptation measures as recommended by CEQ's Final Guidance.

2. On page 0-12 (Table 0-3), the FRA lists performance measures by impact area. The EPA believes that this table is good for giving a brief overview of impact areas; however, there is no definition or explanation of the parameters of High, Medium and Low.

**Recommendation:** The EPA recommends that the FRA in the Final EIS (FEIS) provide the parameters for defining High, Medium and Low with respect to potential impacts.

3. On page 2-23 (Table 2-5) of the DEIS, the FRA has listed highway projects in the study area; however, there is no listing of the I-75 High Occupancy Toll (HOT) lanes that is currently being constructed. The EPA also notes that there was no discussion regarding the I-75 HOT lanes anywhere within the DEIS. This is especially concerning considering all of the alternatives moved forward for further consideration will be built within the ROW of I-75 where the HOT lanes are currently being constructed.

**Recommendation:** The EPA recommends that the FRA disclose the I-75 HOT lanes and potential conflicts or impacts to all the alternatives planned to be carried forward. The EPA also recommends that the I-75 HOT lane project be included within Table 2-5.

4. On page 3-23 of the DEIS, the FRA states,

*Subsequent analysis will include a detailed air quality assessment on the Preferred Alternative and the station and maintenance facilities locations are finalized. The analysis will evaluate Project's impact on motor vehicle emissions due to local traffic to and from stations and of locomotives and other sources operating in rail yards. Potential construction impacts also will be analyzed. If the Project is not included in the Georgia SIP, an applicability analysis will be performed to determine if a general conformity analysis is required.*

The EPA believes that the above statement is ambiguous and it is unclear if the stated "Preferred Alternative" will be evaluated for general conformity during the Tier 1 or Tier 2 EISs. The EPA understands the need for more detailed modelling and assessment to conduct a general conformity analysis. However, the EPA believes that there should be some sort of comparative analysis of each corridor within the Tier 1 EIS to determine which corridor would have the least potential impact on conformity.

**Recommendation:** In the Final EIS, the EPA recommends that the FRA expand the general conformity discussion to include a comparative analysis of each corridor's potential impact to conformity. Additionally, the EPA recommends that the FRA clarify when they plan to determine if and when they would conduct a general conformity analysis (Tier 1 or Tier 2). The EPA also suggests that the FRA consider an evaluation of the proposed project alternatives in the context of meeting the potential purpose of Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks.

5. On page 3-73, the FRA listed all of the hydrologic unit code (HUC) runs and the associated use classification, but did not list HUCs with the fishing designation. Please identify if this is a coincidence or if there are other runs not listed because they are not identified in Georgia Rules. The EPA notes that Georgia does not list waters that have the fishing designation. They simply state that if it is not listed in the Rules, then the water would be classified with the fishing designation.

**Recommendation:** The EPA recommends that the FRA clarify in the FEIS the reason why all HUC runs (and designation use) that were not listed within the Tier 1 DEIS.

6. On page 3-76 of the DEIS, the FRA discusses water quality impacts and states, "If a Corridor Alternative is selected, detailed analysis in Tier 2 will determine the specific increase of impervious area that would result from the development of the selected alternative." The EPA acknowledges this approach; however, we believe that there are other discriminating factors that could be considered when disclosing water quality impacts for each corridor.

**Recommendation:** The EPA recommends that the FRA describe water quality impacts for each corridor in terms of each corridor's impacts to existing Clean Water Act Section 303(d) listed impaired waters. As with other impacts such as wetland acres and number of stream crossings, each corridor could be evaluated in terms of impacts to 303(d) listed waters. The EPA also recommends these water quality impacts be displayed in Table 6-4 within the FEIS.

7. Within the Cumulative Effects section (page 3-92), the FRA states, "This analysis only considered transportation improvements projects. Land developments of regional impact would be included during subsequent Tier 2 analysis of secondary and cumulative effects." The EPA notes that the I-75 HOT lanes project was not included within the cumulative effects analysis (see previous comment). The EPA is also concerned that land development impacts were not considered in the cumulative effects analysis. The FRA acknowledges that secondary land development might occur around station areas, but determines that these effects would be the same for all corridors (page 3-92, 3.11.3). The EPA is concerned with this assertion because some stations have greater potential for growth and sprawl compared to other stations. For example, the I-75/Rome Corridor would have 9 stations while both the I-75 Corridor and East Corridor would have 8 stations, which could lead to the determination that the I-75/Rome Corridor might have more potential for developmental growth because it will have more stations.

**Recommendation:** For the FEIS, the EPA recommends that the FRA include the I-75 HOT lanes project within the FEIS's secondary and cumulative effects analysis. The EPA also recommends that the FRA consider land development impacts associated with each corridor's stations and conduct a comparative secondary and cumulative effect analysis. Additionally, the EPA recommends that the FRA could describe any reasonable, foreseeable land development activities around the stations, which would also provide information for a secondary and cumulative effects comparative analysis between the three (3) corridors.