



September 10, 2010

Mr. Glenn Bowman
Department of Transportation
Office of Environmental Services
One Georgia Center
600 West Peachtree Street, NW, 16th Floor
Atlanta, Georgia 30308

Dear Mr. Bowman,

The Lindridge Martin Manor Neighborhood Association (LMMNA) received your letter dated August 17, 2010, requesting our input for developing appropriate measures to mitigate the adverse visual effects created should the proposed SR 400/I-85 Connector Ramp project (GDOT Project NH000-0085-02(153), Fulton County, P.I.#762380) be advanced. We believe that this letter was sent to comply with Section 106 of the National Historic Preservation Act, because GDOT identified historic properties within the geographic area of potential effects, and that a field survey identified the Lindridge Martin Manor neighborhood as a historic district eligible for listing in the National Register of Historic Places. In order to comply with the 30 day response timeline afforded us, we submit the following letter. Please note that this document serves as an initial response only, given the facts currently available to us. As future information becomes available to our organization, we reserve the right for future response and action as appropriate. This letter, in no way, serves as a complete and exhaustive outline of our concerns and/or proposed mitigation measures.

LMMNA reiterates our belief that this project should not be prioritized for the reasons outlined in the Lindbergh LaVista Corridor Coalition's (LLCC) position statement issued on July 14, 2008, to which we were co-signatories. Despite this belief, should GDOT proceed with this project as planned, we request the following as minimal mitigation measures.

The proposed height of the ramps will, indeed, create extensive adverse visual impact. Unfortunately, LMMNA maintains that, at the height proposed, it would prove impossible to successfully mitigate this impact. We, therefore, again request that GDOT lower the design speed for this project. This action would allow for ramps to be constructed at a lower height and with a tighter radius thus minimizing proximity to our residents and, therefore, impact to our neighborhood. In previous conversations with LMMNA, GDOT engineers have indicated that this may not be technically feasible. LMMNA maintains that this is indeed a feasible alternative that has not been adequately explored, and should not be dismissed at this time. LMMNA requests that GDOT pay for the cost of an external technical review of the design, with the firm conducting such review to be selected by LMMNA.

LMMNA is in the process of applying for listing in the National Register of Historic Places. As part of mitigation for the construction of the road, LMMNA requests GDOT to fund our application which would include the hiring of an external consultant chosen by LMMNA to prepare and submit the necessary documentation to the State Historic Preservation Office (SHPO). In addition, we request GDOT to assist in expediting the review of our application with the SHPO so that it may be on record prior to beginning any construction of the ramps.

LMMNA also seeks to become a consulting party between the SHPO and GDOT as we seek to review past official documents of interest and be privy to additional documents and findings in the future.

Perhaps one of the greatest potential assets for our neighborhood is historic Peachtree Creek. Our neighborhood lies at the confluence of the North and South Forks. LMMNA is concerned that construction of this project will exacerbate the already adverse visual impact the highway creates on this historically significant waterway.

We also fear that the ramp construction will destabilize the creek banks thereby contributing to increased flooding within our neighborhood. Such a result, threatens the viability of many of our historic homes and properties. This flooding further destabilizes the creek banks resulting in property loss for residents and threatens the health and aesthetic value of this vital and historically important waterway. To mitigate this impact, we first recommend that GDOT fund a study of Peachtree Creek examining viable flood control and stream bank stabilization measures required to mitigate this impact, and to fund and implement those measures as LMMNA so approves. This may also include the purchase by GDOT of those properties deemed FEMA- eligible for use as future public greenspace should property owners so desire. Furthermore, LMMNA, in partnership with the LLCC, wishes to raise awareness surrounding the environmental and historic significance of Peachtree Creek. Toward this end, we ask that GDOT grant public access to the creek through the funding and completion of the Confluence Trail System as proposed by the LLCC and the South Fork Conservancy. A major component of this effort would include an aggressive program to remove non-native, invasive species, such as kudzu and privet, to be replaced by appropriate native species that would secure the banks and provide habitat for indigenous plants and animals.

LMMNA appreciates the efforts of GDOT to reach out to us regarding these matters of historic significance and visual impact. Previously, however, LMMNA has outlined other concerns regarding adverse impacts should this project move forward. GDOT has failed to address many of these issues to our satisfaction. LMMNA has requested in the past, and reiterates that request in this letter, that we receive a copy of all NEPA documents as it relates to this project and an update on where this project stands in the NEPA process. We have concerns over negative impacts such as noise, lighting, flooding, and air quality measures. While this letter serves to address visual impact and Section 106 compliance, these other impacts cannot be ignored and mitigation measures for them should be considered.

The projected cost of this project as estimated in 2004 was approximately \$22.5 million. Should GDOT construct this project at a later date, the associated costs will prove significantly greater. At a time when GDOT, the City of Atlanta, and, indeed, the state of Georgia are facing significant budget constraints, LMMNA believes that the high cost of this project is not justified in terms of its benefit to our neighborhood and/or the region as a whole. Indeed it is inconsistent with the City of Atlanta's stated priorities of "predominantly operational and transportation mitigation projects" of a mixed use nature that are pedestrian in scale. These priorities are contained within the locally approved City of Atlanta Comprehensive Transportation Plan. Within this plan, the City of Atlanta Planning Department concludes, "The City supports the construction of the interchange at Georgia 400 and I-85 provided the design is consistent with the principles of this study, avoids impacts to adjacent single family neighborhoods and that the project is funded by regional/federal and state sources rather than City of Atlanta funds or funds which would

otherwise be due the City." It is the stance of LMMNA that the plan as proposed does not satisfy these conditions.

Please contact me upon receipt of this letter to schedule a meeting within thirty days, with the appropriate representatives from the following agencies: GDOT, Federal Highway Administration, SHPO and others as copied below, to clarify project status and how GDOT intends to proceed. As part of this meeting, LMMNA wishes to outline a prioritized project list for mitigation. Representatives from LMMNA are available to meet on the following dates in the upcoming month: Tuesdays on September 14th, 21st, 28th, or October 5th; and Fridays, on September 17th, 24th, October 1st, or 8th. Please respond to:

Jane Rawlings
Lindridge Martin Manor Neighborhood Association
2116 Lenox Road NE
Atlanta, GA 30324

In order for LMMNA to comment sensibly and completely on all desired mitigation actions, we need to review carefully the plans that GDOT currently has prepared and/or the mitigation measures GDOT is contemplating.

Respectfully,



Jane P. Rawlings
President Lindridge Martin Manor Neighborhood Association

cc: Congressman John Lewis, U. S. Congress 5th District
Rodney N. Barry, P.E., FHWA, (Attn: Jennifer Giersch)
David Crass, Deputy SHPO
Amber Phillips, GDOT NEPA
Albert Shelby, GDOT Project Manager
Nancy McReynolds, Terracon
Stanley Meiburg, EPA, Acting Regional Administrator
Beverly Houston Banister, EPA, Acting Deputy Regional Administrator
Carl Terry, EPA, Director Office of External Affairs
Tad Leithead, Chair, Atlanta Regional Commission
Nan Orrock, State Senate, District 36
Pat Gardner, State Representative, District 57
Kasim Reed, Mayor City of Atlanta
James Shelby, Commissioner of Planning, City of Atlanta
Richard Mendoza, Commissioner of Public Works, City of Atlanta
Rob Hunter, Commissioner of Watershed Management, City of Atlanta
Alex Wan, City Council, District 6
Charletta Wilson-Jacks, Director of Planning City of Atlanta
Doug Young, Assistant Director of Planning City of Atlanta
Henry Batten, President Lindbergh LaVista Corridor Coalition

