May 3, 2018

Wilton Rooks
615 F Oak Street
Gainesville, GA 30501

Re: Responses to Open House Comments for PI#: 0010212, Hall County, State Route 53 (SR 53) Westbound Bridge over the Chattahoochee River/Lake Lanier

Dear Wilton Rooks,

Thank you for your comments concerning the proposed project referenced above. We appreciate your participation and all of the input that was received as a result of the January 11, 2018 Public Information Open House (PIOH). Every written comment received and verbal comment given to the court reporter will be made part of the project’s official record.

A total of 20 people attended the PIOH. Of the 16 respondents who formally commented, 1 was in support of the project, 4 were opposed, 1 was uncommitted, and 10 expressed conditional support.

The attendees of the PIOH and those persons sending in comments within the comment period raised the following questions. The Georgia Department of Transportation (GDOT) has prepared this one response letter that addresses all comments received so that everyone can be aware of the questions raised and the responses given. Please find the comments summarized below (in italics) followed by our response.

- **In support of the project.**

  The GDOT appreciates your comment.

- **Concern that the proposed bridge negatively impacts the Sidney on Lanier subdivision by creating an eyesore and devaluing the subdivision homes. Consider using the design of the sister bridge rather than building a new costly one. Consider fixing bridge instead of building new one.**

  The existing SR 53 westbound bridge is proposed for replacement due to the age of the existing structure, the fracture critical rating, section loss in the truss members, and a functionally obsolete classification with an outdated construction date of 1956 and only one modification in 1992. In 2017, the average annual daily traffic (AADT) totaled 13,975 vehicles. By 2023 the AADT is projected to be 15,250 vehicles. The existing bridge does not have the proper infrastructure to support this increasing annual volume of traffic. The cost of maintenance on the existing bridge is expected to increase over time as the bridge continues to age and deteriorate. The GDOT has been considering multiple alternatives for the bridge alignment and for traffic maintenance based on the PIOH feedback.

  The GDOT is considering multiple alternatives for the bridge alignment and for traffic maintenance based on the PIOH feedback. Alternatives considered include:

  - Reconstructing the SR 53 westbound bridge on existing alignment with traffic maintained on the existing SR 53 eastbound bridge during construction;
  - Reconstructing the SR 53 westbound bridge on existing alignment and widening the SR 53 eastbound bridge to accommodate additional travel lanes during the SR 53 westbound bridge closure;
Reconstructing the SR 53 westbound bridge between the existing SR 53 eastbound and westbound bridges with traffic maintained on the existing SR 53 westbound bridge during construction;

- Reconstructing the SR 53 westbound bridge to the north of the existing SR 53 westbound bridge alignment with traffic maintained on the existing SR 53 westbound bridge during construction.

Public feedback, preliminary traffic studies, potential right-of-way (ROW) and easement requirements, anticipated impacts to environmental resources, and cost and constructability of the alternatives are all taken into consideration during project development. In an effort to minimize impacts on area residents and businesses, the traveling public, and environmental resources while considering project costs and constructability, the preferred alternative concept was developed and presented at the January 11, 2018 PIOH. The preferred alternative would reconstruct the SR 53 westbound bridge approximately 45 feet north of the existing SR 53 westbound bridge with traffic maintained on the existing bridge during construction. This preferred alternative is not anticipated to require ROW or easement acquisition from area residences or businesses, with only minimal easement acquisition anticipated from the US Army Corps of Engineers.

The proposed westbound bridge would be designed to have a similar appearance to the existing eastbound bridge. Reconstructing the westbound bridge as a truss bridge is not under consideration because truss bridges are no longer a common bridge construction method. Reconstructing a truss bridge would add to the project costs, and a truss bridge would require additional annual maintenance for protective painting beyond the maintenance that would be required for the proposed concrete bridge.

- A likely increase of noise for the Sidney on Lanier subdivision due to the proposed bridge construction and its proximity to the subdivision. Concern that there is no type of planned noise abatement.

All federal aid projects are assessed to determine the level of noise analysis. Per the GDOT Noise Policy, developed in compliance with Federal Highway Administration (FHWA) Noise Regulations, a screening for a Type III Noise Assessment was conducted. Although the proposed bridge replacement project involves shifting the bridge alignment both vertically and horizontally, the new proposed alignment would not be considered a substantial alteration to the alignment; therefore, the project would not require a more detailed Type I Noise Assessment, and no further noise analysis is required.

For additional information regarding the GDOT’s requirements for all types of noise analysis, please refer to the following link.

- Unnecessary time and money will be spent by not utilizing existing elements of the SR 53 westbound bridge piers, site crossing, and road bed, and would require unnecessary embankment work and road access adjustment. Building the bridge on new alignment rather than utilizing existing features would be more time consuming, more costly, and less visually appealing. The proposed retaining walls would be unsightly and costly.

The construction timeframes are expected to be comparable for both the alternative that would use an offset alignment and an alternative that closed the bridge and used existing alignment. Additionally, there is minimal ROW acquisition that would affect the cost in either scenario. Rebuilding on existing alignment would be expected to be less expensive because less work would be required on the roadway approaches. However, the construction of the bridge itself accounts for the majority of the overall construction costs. In addition, the existing foundations and footings for the current westbound bridge are...
of an unknown type, and the existing piers would need to be replaced regardless of the bridge alignment that is developed. The GDOT considered multiple alternatives for the bridge alignment and for traffic maintenance based on the comments received from the public. Cost is taken into consideration along with property, traffic, community, and environmental impacts.

The construction of a retaining wall would be required in both of the above alternatives to reduce or eliminate the placement of fill material within Lake Lanier. Minimizing the placement of the fill within Lake Lanier would minimize impacts to this resource that is a jurisdictional water of the US and a public recreation facility. The expense for the retaining wall is minimal compared to the bridge costs.

- **Divert traffic from the westbound bridge to the eastbound bridge so that the westbound bridge can be demolished and reconstructed.** The temporary inconvenience to traffic would be outweighed by the less destructive and more aesthetically pleasing bridge replacement in the current location. The existing eastbound bridge is wide enough to accommodate three lanes of multi-directional traffic, and would eliminate the high cost and duration of the proposed bridge.

The GDOT takes multiple factors into consideration when selecting the preferred alternative for a project, including: cost, property impacts, traffic studies, and environmental and community impacts. Traffic studies during the planning phase of this project estimate that if both directions of traffic are shifted to the eastbound bridge, traffic backups would be expected to be between 0.5 and 1.0 mile during peak hours. Adverse traffic congestion during the two year construction phase of this project would be a significant impact on the tens of thousands of drivers who use this bridge daily.

The aesthetics of the project would be similar if the westbound bridge is permanently realigned or if traffic is shifted to the eastbound bridge during construction. There would be work within the median (ground disturbance and temporary pavement) to construct crossovers to route both directions of traffic to the eastbound bridge. In either alternative, an area of existing pavement would be removed and grassed for a similar appearance to the current median. The median width would be wider in an alternative that would shift the westbound bridge alignment.

- **Replace the westbound bridge in the same location, and then put the new bridge on the southwest side.**

Please see above response for a discussion of the alternatives that are being considered on this project. Shifting the alignment to the southwest would increase residential and business property impacts, impacts to Lake Lanier, and construction costs as well as increasing the project length and the duration of construction.

- **Use of existing bridge features and design and construction of new bridge between the existing bridges.**

Constructing the new bridge between the two existing bridges was an alternative considered, and it was determined that there is insufficient space for construction activities for a new bridge between the two existing bridges. While the proposed bridge would fit in the space between the existing bridges, there is insufficient space for the construction activities and for the removal of the westbound bridge.

- **The time frame of the proposed bridge replacement project is going to be longer than two years. The Little Hall Bridge project is already into its second year.**

Two years is the anticipated construction time to allow for construction of the new bridge and demolition of the existing bridge, with construction tentatively anticipated to begin in September 2019. If you would
like further information on the construction of the Little Hall Bridge, or have any additional concerns please contact Brent Cook, District 1 Engineer, at 770-533-8955 or bcook@dot.ga.gov.

- The proposed bridge design has unnecessarily complicated approach at both on and off ramps from the new bridge. Proposed approach road and ramp to the new bridge adds unnecessary and less safe curves to the busy SR 53 road at both the entry and exit off the new bridge, which is especially less safe during road icing conditions in winter.

One of the GDOT’s top priorities is to provide safe roads and structures to travelers through designs that are consistent with the GDOT Bridge Office practices. The proposed bridge design fully satisfies current design standards of American Association of State Highway and Transportation Officials (AASHTO) and the GDOT.

- Comment system not accepting all comments. Meeting not adequately advertised for stakeholder input.

We apologize for any technical issues while trying to submit a comment. Additionally, there are standard procedures that GDOT follows for advertising, including the placement of advertisements in the local newspaper and placing signs around the project area and public meeting venue. We strive to communicate openly at all stages of projects, and we apologize you did not feel informed or heard. Every comment is documented, considered, and provided with a response. If you or others who were not able to attend the meeting have questions that have not been addressed in this letter, please contact Richard O’Hara, the GDOT Project Manager, at 404-631-1169 or RO'Hara@dot.ga.gov.

- Recommend GDOT consider financial incentives to the contractor for early completion of the project similar to that provided to the contractor on the quickly repaired Interstate 85 roadway that was replaced in a remarkably short timeframe.

Design-Build Procurement will include minimization of the construction schedule duration. GDOT and the Design-Build Team will work together to identify possible innovative strategies to minimize the overall construction duration. During the I-85 emergency bridge repair project, the bridge was entirely closed to traffic in both directions. However, for the SR 53 bridge replacement project, we are keeping the existing bridges open to traffic during construction, therefore financial incentives similar to the I-85 project are not warranted.

- Lack of environmental analysis and request for Environmental Impact Statement.

The proposed project is being developed in compliance with the National Environmental Policy Act (NEPA). In accordance with NEPA requirements, the social, cultural, and natural environment are being considered during the project development process, and measures to avoid, minimize, and mitigate impacts are being assessed. Based on the project type (bridge replacement), the anticipated level of environmental documentation is a Categorical Exclusion (CE) with a Programmatic Section 4(f) Evaluation. Section 4(f) of the USDOT Act of 1966 refers to the temporary and/or permanent use and/or constructive use of land from a significant publicly owned park, recreation area, or wildlife and waterfowl refuge, or any historic site for transportation purposes. Lake Lanier, as a public recreation area, and the existing SR 53 westbound bridge, which is considered eligible for the National Register of Historic Places, qualify for protection as Section 4(f) resources.

Under the CE class of action, a Public Hearing Open House (PHOH) is not required, and an additional PIOH is not planned at this time. Copies of the CE document, once approved, may be obtained by
completing an Open Records Request Form and submitting it to GDOT’s Office of Legal Service, 600 West Peachtree Street, NW, Suite 2300, Atlanta, GA, 30308. Information on the Open Records Act and process can be found at: http://gaf.org/open-records-act-2007/. If you have concerns that have not been addressed in this letter, please contact Richard O’Hara, the GDOT Project Manager, at 404-631-1169 or RO'Hara@dot.ga.gov.

- **Lake levels should NOT be held down to accommodate bridge building. Lake Lanier is the largest and most important reservoir in the State of Georgia, supports the municipal water needs of more than four million people, and is the primary storage resource for the entire ACF basin. Bridge construction needs to be conducted without negatively impacting water levels.**

The proposed project is anticipated to be constructed from a barge; therefore, reductions in lake levels would not be required.

- **The Lake Lanier Association (LLA) requests that GDOT take extra care to prevent any siltation, sedimentation, runoff, or erosion involving the lake.**

The contractor would be required to use best management practices (BMPs) regarding erosion and sedimentation control during construction. If failure of these measures is noted during construction, please contact the GDOT Project Manager, Richard O’Hara, at 770-631-1169 or RO'Hara@dot.ga.gov.

- **Bridge construction affecting boat traffic. Presuming that a no wake zone will be required for construction, we encourage GDOT to minimize interference with boat traffic by concentrating pier construction in the cold-weather months and by minimizing any no-wake zone to the smallest area and shortest time frame possible.**

The GDOT is in the process of coordinating project construction activities with the US Army Corps of Engineers. Seasonal and recreational concerns will be taken into consideration as part of the project development. The safety of the recreational users and the construction workers would also need to be considered when determining if the use of no-wake zones would be appropriate for this project.

General Comments:

- **Concerns of a previous project widening development.**
- **Request of bypass or other alternative to create positive traffic flow into the downtown area. Increased traffic likely to home expansions.**
- **Pedestrian and/or crosswalk hazard at the intersection of where McDonalds is located on McEver.**
- **The entrance and exit to Sidney on Lanier neighborhood requires an incredibly dangerous U-turn into 55-70mph traffic. A crossover or a light should be put in because accidents have been witnessed as residents try to enter or exit the neighborhood.**

The GDOT appreciates your comments. These areas are beyond the limits of the proposed bridge replacement project; however, your comments have been forwarded to Brent Cook, the GDOT District One District Engineer for consideration. If you would like further information or have any additional concerns please contact Brent Cook, District 1 Engineer, at 770-533-8955 or bcook@dot.ga.gov.
Again, thank you for your comments. Should you have further questions or comments, please call the project manager, Rick O’Hara, at 404-631-1169 or the environmental analyst, Sam Boring, at 404-631-1872.

Sincerely,

Eric Duff
State Environmental Administrator

cc:  Rick O’Hara, GDOT Project Manager
     Sam Boring, GDOT NEPA Analyst
     Katrina Anderson, GDOT Assistant ROW Administrator
     Brent Cook, GDOT District 1 Engineer
     PDF for Project File