



**January 23, 2020 Public Information Open House
GDOT PI 0010474, DeKalb County
Drainage Improvements along State Route (SR) 8 from
South Ponce de Leon to North Ponce de Leon**

Response to Public Comments

June 2020

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On January 23rd, the Georgia Department of Transportation (GDOT) hosted a Public Information Open House (PIOH) to provide project information and to gather public feedback on the drainage improvement project located along State Route (SR) 8/Ponce de Leon Avenue NE from S Ponce de Leon to N Ponce de Leon. The goal of the project is to prevent flooding on the road surface by improving the storm drain systems that allow excess water to pond during significant rainfall events on SR 8/Ponce de Leon Avenue NE.

The Georgia DOT (GDOT) values the feedback of the community, and local groups were engaged early in the process and have influenced the project throughout its development. GDOT reached out to stakeholders in 2017 through early coordination activities to provide information and opportunity for involvement. This has led to continued outreach and engagement including stakeholder meetings, site visits, direct outreach for input, and the presentation of this plan (among others) in May 2019 at a charrette for local projects. This feedback and community involvement already have shaped this project in a number of ways including maintaining the existing curb line to preserve park land, retaining the granite curbing that holds character in the neighborhood, and adjusting the design to further protect trees and other natural and historic resources, while delivering a project that meets community needs. This PIOH was held to further engage the public and provide additional opportunities for comments and concerns to be voiced and addressed in addition to the work that has previously been done to involve stakeholders.

The attendees of the PIOH and those persons submitting comments within the comment period raised a number of questions related to the project. A total of **61** people attended the PIOH, of the **40** respondents who formally commented, **5** were in **support** of the project, **1** was **opposed**, **9** were **uncommitted**, and **25** expressed **conditional support**.

The 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. Due to the high volume of responses received, the questions raised during the PIOH have been summarized for readability and have been addressed below based on their topic. The comments received have been organized into the broad topics presented in italics followed by GDOT's response. Every written comment received, and verbal comment given to the court reporter will be made part of the project's official record. It is important to GDOT that all public comments are recognized, and the full text of the submitted comments is available to read for each topic described below in the attached Index of Public Comments. We would like to thank you for your comments concerning the proposed project referenced above. We appreciate your participation and all the input that was received as a result of the PIOH.

Project Scope and Purpose

- *I am concerned that the scope of the project does not fully address the water pooling issues that originate at the intersection of Ridgecrest Road NE and Ponce de Leon Avenue NE.*

Response: This project addresses the existing drainage outfalls at three low points along SR 8/Ponce de Leon Avenue NE, including the low point in the vicinity of Ridgecrest Road. The existing drainage infrastructure at these locations is inadequate to safely handle the design rainfall event for state routes (10-year storm). The existing stormwater infrastructure is also subject to clogging.

- *The roadway along Ponce de Leon Avenue NE should be widened due to traffic currently running over the curbing.*

Response: The scope of this project is limited to providing drainage improvements along the corridor to better manage the stormwater that accumulates in the roadway. The concept that was presented at the PIOH is the result of on-going stakeholder engagement and includes a commitment by GDOT to maintain the current edge of pavement as to not further impact important cultural and historical features in the area.

- *There was a project in this area that was proposed previously. Why is GDOT not building the plan that was agreed upon before?*

Response: Previous projects in this area focused primarily on pedestrian improvements along SR 8. The project concept report was revised/approved on May 25, 2011 and broken out into multiple phases due to constrained DeKalb County funding for ROW acquisition. This project was split off and designed for drainage improvements only, while sidewalk improvements were programmed through different projects. The goal of this project is to address the roadway flooding along the corridor that impacts both vehicular and pedestrian traffic.

- *Focus on the people who live in this area, rather than the cars who utilize this corridor.*

Response: The purpose of this project is to improve stormwater conditions and to reduce the risk of flooding in the project area that affects both vehicular and pedestrian traffic, as well as those who live along the corridor. Given the limited scope of the project (drainage improvements), the project is not anticipated to generate additional vehicular traffic or move the roadway closer to adjacent properties. In addition, through stakeholder engagement efforts, GDOT is working to design a project sensitive to the needs of pedestrian traffic in both Deepdene Park and along the existing sidewalk network within the corridor.

Drainage Structures

- *Please elevate, restore, or install granite curbing on the corridor, rather than concrete.*

Response: This project proposes resetting or replacing granite header curb in place. The use of concrete curb and gutter is not proposed.

- *I have noticed that one issue is the amount of debris that currently flows into the storm drains. There do not currently appear to be sufficient grates to stop large debris that is often pushed into the drains by storms or landscaping.*

Response: Curb opening catch basins are proposed for the majority of the locations along the project to replace the existing grated drop inlets. Curb opening catch basins have been shown to vastly reduce the amount of clogging due to debris.

- *What is the rationale for having as many storm drain inlets along Ponce de Leon? What does the gutter flow analysis lead to?*

Response: A thorough analysis of each of the existing drainage systems using *Hydraflow Storm Sewers 2005* was done based on a field survey. This analysis led to the conclusion that the existing drainage system, designed in the 1930s, was no longer adequate to handle the current runoff conditions due to the urban buildup in the area since that time. An analysis of the areas where flooding was known to occur during heavy rain events show calculated gutter spreads in the range of 30 feet or more in the sag areas. The additional proposed catch basins will allow the gutter spread to stay within one half of a travel lane (5 feet) per the GDOT drainage manual for the design storm (10-year storm).

- *I am interested to know the type and size of the drainage inlets, as well as the size of storm water drainpipe that will be used.*

Response: GDOT standard 1033F and 1034F curb opening (opening length of approximately 12-ft) inlets are proposed for most of the project. Drainpipe sizes vary based on the analysis that was conducted and includes 18-, 24-, 30-, 36-, and 48-inch storm drainpipes to convey the stormwater within the project limits.

- *Why is the outfall near the bend on Ponce not moved further east? It would lessen the impact to the mature trees.*

Response: The proposed outfall is planned to replace the current outfall in the same location and its location is being carried forward to minimize impacts to existing mature trees. However, during the final design process, GDOT will investigate the feasibility of shifting the outfall to the east.

- *The new drainpipes should be placed underneath the Ponce de Leon Avenue NE travel lanes and not between the north curb and the tree allée. There are numerous utilities that could remain undisturbed if the storm sewer were located under the travel lanes and would be less disruptive to plantings and roots.*

Response: This alternative was evaluated for the proposed project; however, it is not being carried forward due to challenges associated with future maintenance. Placing the new drains/pipes underneath the travel lanes will make accessing these features difficult for maintenance crews if work/repairs are needed in the future. Therefore, placement of drains/pipes under easements is the current proposed alternative.

- *Has the possibility of placing the drainage pipes underneath the promenade sidewalk been explored? We feel that having a conversation involving Fernbank, OLPA, GDOT, DeKalb County and our representatives regarding this alternative could increase the potential to save trees along the roadway.*

Response: A number of alternatives were proposed by attendees at the PIOH. The design team is evaluating presented alternatives for applicability in meeting the purpose for the project while minimizing impacts to area resources. GDOT has been in on-going communications with the area's stakeholders, which include Fernbank, OLPA, and DeKalb County, and is currently coordinating with the stakeholders on this issue.

- *I am concerned about the impact of stormwater coming into Deepdene park. How will the velocity and volume of water be managed as it enters the park? How will the design mitigate the effects to the old growth trees and to the long-term health of the park? Olmsted Linear Park Alliance (OLPA) wants to conduct an independent hydrology study to see if there are workable compromises.*

Response: Rip-rap is proposed at all outfall locations to dissipate the velocities of water entering the existing channels and streams within the park. Additionally, drop structures are proposed to reduce the energy of the water prior to reaching the outfalls. Two of the existing outfalls have pipes located 5 to 10 feet above the surrounding ground causing high amounts of erosion. The drainage improvements proposed by this project will lessen the existing erosion causing damage. Per the GDOT approved *Post-Construction Stormwater Report*, this project is not proposing any additional quantity of water to enter the streams.

- *I am concerned for the well-being of the wildlife in Deepdene Park. All work should be closely monitored by an environmental professional due to these sensitive areas that must be protected.*

Response: The importance of Deepdene Park is critical to the community, as GDOT has observed through on-going consultation with Fernbank and other stakeholders (OLPA and DeKalb County). In addition to stakeholder engagement and more general public outreach that included the PIOH, GDOT's project manager continues to be responsive to stakeholder requests for information as the project has advanced. Stakeholder feedback has helped shape the current proposed alternative to address public concerns and further minimize impacts to the park as well as other area resources.

Once the project is underway, GDOT will ensure the contractor selected constructs the project consistent with the conditions of the annotated project plans that will include environmental commitments specific to Deepdene Park. These commitments are still being developed and will be followed by the contractor during construction. These environmental commitments will be consistent with those presented in the federally-approved NEPA document as well as any Best Management Practices and permitting conditions specifically associated with the project.

- *I am concerned about the erosion and sedimentation issues that will result from an increase in stormwater being routed into Deepdene Park. Will rip-rap be sufficient to slow the water down? Would additional outfalls help to lessen the impacts?*

Response: Per the GDOT approved *Post-Construction Stormwater Report*, this project is not proposing any additional quantity of water to enter the streams. Resetting and/or replacing the granite header curb located along the project will prevent erosion and sedimentation due to the sheet flow of water from the roadway. In addition, drop structures, rip-rap, and other energy dissipating devices are proposed to reduce the velocities of the water entering the streams within the park. Proposed outfalls are located at the approximate location of the existing outfalls. Additional outfall locations were not considered due to concerns over further impacts to mature trees and the park itself.

- *I would like to propose as many infiltration opportunities as possible for water before it enters the park. Have alternatives such as the use of check dams, rain gardens, porous pipes, or infiltration beds been considered?*

Response: A number of various alternatives, such as those outlined in comments/questions received at the PIOH, have been evaluated for the treatment of stormwater in the area. When being evaluated early in preliminary design, adverse impacts and right-of-way takes within the park would have resulted from these methods and were deemed as infeasible. The solution currently proposed will address the need and purpose of the project while being sensitive to the adjacent land uses and area resources.

Impacts to Parks

- *Deepdene Park is of national historic importance. It is not appropriate to place formed concrete structures and rip-rap in this historic area.*

Response: Design of the project presents a number of unique challenges associated with resources like Deepdene Park and the Druid Hills Historic District. GDOT has examined a number of various approaches to address the flooding in the area while ensuring the aesthetic of the park is retained. Such measures include resetting and/or replacing the granite header curb located along the project as well as minimizing harm to the existing tree line along the park property. The proposed rip rap has been included to slow water and protect from erosion damage to the park, while not adversely affecting the historic district.

- *Thank you for the partnership with OLPA to date, and it is very important for that relationship to continue through the life of the project. Please continue to seek OLPA's input and approval on potential impacts to the park infrastructure. They have spent time and money restoring Deepdene park, how will the potential for disturbing this work be handled?*

Response: The GDOT has engaged in on-going efforts to involve organizations and stakeholders in the area. Typically, drainage projects involve very limited public involvement; however, GDOT recognizes the unique nature of the properties involved and the concerns that many of the stakeholders have about activities in this area. OLPA, DHCA, Fernbank, and DeKalb County representatives have been involved in meetings with GDOT and have been invited to comment on the events of those meetings. Additionally, as

consulting parties under Section 106 of the National Historic Preservation Act, each organization is invited to review and comment on cultural resource documentation prepared for compliance, such as the Historic Resources Survey Report and the Cultural Resources Assessment of Effects. This coordination will continue and be on-going as GDOT is invested in providing a context-sensitive solution that addresses both the safety concerns of the roadway as well as the concerns of the public.

- *What work is intended in Dellwood Park? Does this work violate the Consent Decree (Section IX, Civil Action File No. 88-6429-3)?*

Response: The proposed project would involve improvements adjacent to Deepdene Park but would not impact Dellwood Park. The proposed improvements are not in violation of the noted consent decree.

Environmental Concerns

- *The Frazer Center recently restored and relocated the historic gate at the entrance. Will this be impacted?*

Response: The recently restored and relocated gate at the entrance of the Frazer Center is located outside the area where construction is anticipated and will not be impacted by this project. In addition, The Frazer Center is an identified stakeholder associated with the project and, as a result, will be a part of GDOT's on-going coordination efforts.

- *Has GDOT considered any design variances due to the significant historic and environmental resources nearby?*

Response: While there are no variances associated with the design currently proposed, changes have been made in the project design that are based on feedback received from the public. These measures include efforts to protect the existing tree line and removal of gutter at Deepdene Park.

- *The Druid Hills area is historic in nature and this project will require creative and out of the box thinking.*

Response: Throughout the development of the project concept, GDOT's design team has welcomed suggestions for measures that might further reduce and minimize impacts to the area as a result of the project. In addition to the feedback received from the participants at the PIOH, recommendations from the project's stakeholders are being incorporated into the design where possible.

- *What are the criteria for defining an Environmentally Sensitive Area? The display shown at the PIOH did not show the boundaries of the Druid Hills Historic District and the waterways were inconsistently identified as part of these sensitive areas.*

Response: Environmentally Sensitive Areas (ESAs) are project-specific and include any ecological, historic, or archaeological resources that require protection. The areas presented are limited to the areas that could be impacted by construction, therefore, resources like the Druid Hills Historic District are not delineated in their entirety. An ESA boundary is based on either a pre-existing agreement between GDOT and the state/federal agency with jurisdiction over the resource's protection or through continued consultation with that agency. As a result, the mapping presented at the PIOH will be re-examined as applicable for accuracy.

Impacts to Trees

A number of comments were provided by the public related to trees within Deepdene Park. Those comments and a response are as follows:

- *I would prefer to not see any trees removed from the area until stress and damage from the construction activity is seen.*
- *I would like to see trees preserved wherever possible and replaced inch for inch with the same species.*
- *I would prefer that no trees be considered for removal at all. The old growth trees and tulip poplars are important to our historic neighborhood.*
- *I am concerned about the impact of the proposed project on the trees that line Ponce de Leon Avenue NE. Trees provide protection for pedestrians from traffic, and a tree-lined avenue is an important visual and historic feature of the area.*

Response: Design efforts focused on maintenance of the tree line and the visual buffer that it affords are being incorporated into the design as a result of stakeholder feedback. Measures were taken as a result of stakeholder engagement to maintain the edge of pavement at the park to avoid impacts to as many trees as possible and protect park resources. Coordination efforts are still ongoing with local stakeholders such as Fernbank and OLPA regarding the future of the trees along the corridor. GDOT's project would not create an unsafe environment for those pedestrians utilizing the trail system of Deepdene Park. The location of the existing trail in Deepdene Park is set back from the road at a distance that is greater than many urban multi-use paths in Georgia. The recommended roadway dimension for Shared-Use Paths is five feet per the current *GDOT Pedestrian and Streetscape Guide* (page 7-10). Currently, the trail is set back 14 to 20 feet from the edge of pavement.

Traffic and Construction

- *I am concerned about the traffic that will result on Ponce de Leon Avenue NE for the duration of the project, and it would have been good to see lane closures highlighted on the handout.*

Response: GDOT proposes to have single lane closures outside of peak hours during early afternoon and overnight Monday through Friday. The single lane closures will continue Friday night to Saturday morning and then Saturday night to Sunday morning. Then continue from Sunday evening to early Monday morning. See single lane closures below:

- a) Single lane closures are allowed between the hours of 10:00 am to 2:30 pm and 9:00 pm to 5:00 am Monday through Friday.
 - b) Single lane closures are allowed between the hours of 9:00 pm Friday to 9:00 am Saturday; 9:00 pm Saturday to 8:00 am Sunday; and 8:00 pm Sunday to 5:00 am Monday.
- *The timing of the project could potentially impact Frazer Center event rentals at the Cator Woolford Garden. Traffic and Construction concerns could negatively impact the client's experience. Please give as much notice as possible on construction timelines so that the Frazer Center, a 501(c)(3) nonprofit, can budget and plan for any potential impacts.*

Response: As the project progresses, GDOT will provide information to The Frazer Center regarding tree clearance needs (if any) and the potential impacts associated with these activities will be considered in final design efforts. Coordination with the Frazer Center will occur, and impacts will be minimized to the extent possible.

- *I am concerned about the impact that noise pollution due to traffic will have on the neighbors.*

Response: Given the limited scope for the project (drainage improvements), the project is not anticipated to generate additional vehicular traffic or move the roadway closer to adjacent properties. Therefore, it is not anticipated that the project would result in a change to the existing noise environment.

PIOH Format

- *I was not satisfied with the format of the Public Information Open House. I would have preferred a more formal presentation format with a question and answer period. I did not find that the individual displays and handouts met my expectations for the level of detail I desired.*

Response: Prior to approval of the environmental document, no decision has been made about the design solution. The PIOH is to provide general project information to residents, to gather input on areas of concern along the corridor, and to gauge community support for projects. A PIOH is an informal meeting following an open house format which generally lasts two to three hours. The purpose is to inform the public of a project that is proposed in their area, gather information from the public, and receive comments from the public about the proposed project. The structure of the open house is an informal discussion format in order to accommodate arrivals and departures during an established timeframe. As a result, there is typically no formal presentation.

PIOH handouts and layouts are made available the day of the open house and on the GDOT website, <http://www.dot.ga.gov/AboutGDOT/PublicOutreach>. Scroll down to “Upcoming Public Meetings” or “Recently Held Public Meetings” and select the project you are interested in. In addition, the handout provided for this meeting identified other locations where the public could access the displays after the meeting had occurred. That information remains available to the public for the duration of the comment period.

- *I would like to see a board with a project overview. I would appreciate a “refresher” since this project is not something I track specifically. I would have liked to have more printed information available at the open house and more information on the project timelines and other projects in the area.*

Response: This PIOH was only to address this project. However, additional information on this project can be found by going online to <http://www.dot.ga.gov/AboutGDOT/PublicOutreach>. Scroll down to “Historical Public Meeting Search”, then select by Project Name as “State Route 8 from Ponce de Leon to North Ponce de Leon - Phase III” or select by PI number “0010474”. Additional projects can be found by GeoPI search at <http://www.dot.ga.gov/applications/geopi>. The database can be searched by ID number, geographic location, or keywords to find information about other nearby projects.

- *I would like to see a site walk scheduled to better clarify what is being done on the project, and I would like to be sure that the project team has spent time walking the area to better understand the challenges.*

Response: All staff working on the project have been to the project site on multiple occasions. Those who have conducted site visits include design engineers, project ecologists, historians, archaeologists, and

environmental generalists. In addition, walk throughs have occurred on-site with agency representatives as well as stakeholders.

- *I would have liked to have seen an equal number of tree displays as project plan displays, as well as photos of similar projects. Having a keyboard to input comments at the meeting will also help with making commenting easier.*

Response: Thank you for the comment and your suggestions regarding the displays, layouts, and keyboards for submitting comments at the PIOH. GDOT will take these suggestions under consideration for future public meetings.

Concerns Beyond the Project Limits

Comments were provided by the public related to the need for improvements beyond the limits of the proposed project. Those comments and a response are as follows:

- *Some of the drainage issues originate on North Ponce de Leon, and I would like to see all of these issues addressed in a combined project.*
- *A project was proposed to redesign the intersection at Scott Boulevard, West Ponce de Leon Avenue, and North Parkwood which would eliminate the steep descent and drainage issues. Limiting the drainage project to its current proportions will not fix the current problems.*

Response: The purpose of the proposed project is limited to addressing the existing drainage issues at SR 8/Ponce de Leon Avenue NE in the areas presented to the public. The eastern most extent of the project ends at a high point along SR 8/Ponce de Leon Avenue NE and extending the project to encompass further drainage basins would double the project length. The scope of the proposed project does not include drainage issues associated with the other roadways noted in these comments.

Property and Right-of-Way

- *I want to be sure that this project has minimal impact to individual property owners and their lawns.*

Response: GDOT is making every effort to avoid and minimize impacts to properties to ensure impacts are only associated with areas required to complete the project.

- *How have the right-of-way (ROW) and easement limits along Ponce de Leon Avenue been confirmed? Historically, there have been multiple owners of ROW along the corridor.*

Response: The project is being developed, designed, and built consistent with GDOT policies and procedures that include a full survey of the adjoining properties and the clear defining of right-of-way limits along SR 8/Ponce de Leon Avenue NE. The current tax cards are pulled and compiled, then compared to the current deeds and plats for the properties. This is done by research through both online documentation at the Georgia Superior Court Clerks' Cooperative Authority (GSCCCA) and through physical courthouse records. Official right-of-way plans at either GDOT or the County Engineer's Office are also gathered, and the information incorporated as applicable. Field crews identify existing geographic markers, then apply standard survey practices to reconcile the deed and plat information and re-establish right-of-way and property lines along the corridor.

The concept, as presented at the PIOH, was based on these survey efforts and the project is being developed based on right-of-way information that was compiled as part of the survey effort.

- *What are the projected impacts to the surrounding private properties, parks, and streams? What are GDOT's plans to mitigate these impacts and restore damage caused by the project?*

Response: Given the nature of the project, impacts will vary by parcel and resource. Similarly, the avoidance, minimization, and mitigation measures that are being considered will vary. As part of the efforts associated with environmental assessments of effects for ecological and cultural resources, GDOT examines potential avoidance and minimization of harm measures to resources, while still meeting the stated purpose for the project. These measures are often shared with stakeholders like those associated with this project and feedback is gathered and considered. Where practicable, these measures are incorporated into the final design, such as retaining the granite curbing and maintaining the edge of pavement to protect park resources.

- *The PIOH display shows activity happening on my property. Is someone going to contact us to discuss this?*

Response: The GDOT makes every attempt to minimize property acquisition during the project design phase. Sometimes, property acquisitions are unavoidable. If your property is required in part, a certified appraiser from the GDOT's Appraiser Prequalification List will make a fair market value appraisal of the area to be required, including any damages to existing systems (e.g., irrigation or septic) or to the remaining land, if applicable. The appraisal will also include the cost of required improvements or other applicable damages.

The GDOT Right-of-Way team will meet individually with each property owner to discuss the project and the impacts to the specific property. At that time, the property owner will see detailed design drawings and have the opportunity to discuss their specific property and access needs. Should you be required to relocate as part of this project, a GDOT representative will assist you during your relocation. You will have sixty (60) days to relocate from the date title passes to GDOT.

More information regarding the acquisition process can be found in the pamphlet titled *What Happens When Your Property is Needed for a Transportation Facility* which can be found on the GDOT website: <http://www.dot.ga.gov/PS/ROW>.

Again, thank you for your comments. Should you have further questions or comments, please call the Project Manager, Davida White, at 404-631-1530 or the Environmental Analyst, Keisha Jackson, at 404-347-0336.

Sincerely,



Eric Duff
State Environmental Administrator

ED/NS, epei

cc: Stacey Key, GDOT Board Member (District 5)
Becky Evans, State Representative (District 83)
Elena Parent, State Senator (District 42)
Davida White, GDOT Project Manager (via email)
PDF for Project File