



September 16, 2021

Re: Responses to Open House Comments for PI#: 0006924, Gwinnett County, Sugarloaf Parkway Extension from Interstate (I)-85 to State Route (SR) 316
Project Number: CSSTP-0006-00(924)

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 *May 12, 2021 to June 16, 2021 Virtual Public Information Open House*. Every written comment received will be made part of the project's official record.

A total of **603** people provided comments on the open house. Of the **603** respondents who formally commented, **134** were in **support** of the project, **407** were **opposed**, **18** were **uncommitted**, and **41** expressed **conditional support**, and **3** did not express their opinion.

The virtual attendees of the open house and those persons sending in comments within the comment period raised the following questions. The Gwinnett County Department of Transportation (GCDOT) and Georgia Department of Transportation (DOT) have 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.

Comments Related to Traffic

1. *Several comments were made regarding the potential for increased traffic due to the implementation of the project. These include: traffic levels on Old Fountain Road, Old Peachtree Road, Morgan Road, SR 316 from Collins Hill Road to Cedars Road, I-85, and existing Sugarloaf Parkway; the project being unnecessary as there are parallel roads providing access to I-85 and SR 316 and also due to the new interchange at SR 324 and I-85; and that studies show that building roads creates traffic congestion.*

In the 1980s, Gwinnett County and the state of Georgia recognized that there was a growing transportation need for cross-county connectivity in the Atlanta Metropolitan Region. Gwinnett County conducted corridor studies of a circumferential route from the Dacula area to the Buford/Sugar Hill/Suwanee area. These studies identified that the lack of circumferential routes created traffic congestion on the radial freeways, principal arterials and two-lane circumferential routes. Additionally, it was identified that improving transportation access to and from regional commercial areas would benefit the County economically. The primary employment centers of Gwinnett County are located in the western half of the County along I-85, Peachtree Industrial Boulevard, and Buford Highway. Employment statistics show that 55 percent of Gwinnett County residences have employment within the County.

Gwinnett County's most recent Comprehensive Transportation Plan (CTP)¹ has identified the need for cross-county connectivity in the northeast part of Gwinnett County and recommended major roadway projects to address future congestion problems due to population and employment growth in the region. The plan also identified the need for an improved overall connectivity within Gwinnett County by tying activity centers to each other through enhanced cross-county movements.

A capacity analysis was conducted assuming the existing conditions for the year 2019, project opening year as 2025, and design year² as 2045 conditions with and without the proposed Sugarloaf Parkway Extension project. The result of the analysis is the determination of the level of service (LOS). LOS is a standard means of classifying traffic conditions associated with various traffic volume levels and traffic flow conditions. There are six levels of service at which a roadway can operate, represented by the letters "A" through "F". Each level is defined by a maximum value for the ratio of traffic volume to facility capacity. A LOS "A" is when the traffic volume is well below the capacity and traffic is flowing freely. LOS "B" is when traffic flow is steady, but the presence of other vehicles begins to be noticeable. A LOS "C" allows for steady traffic flow, but the higher volumes more closely control speeds and maneuverability. LOS "D" is approaching an unsteady flow in which speed and maneuverability are severely restricted. LOS "E" is when traffic flow is reduced to a slow but relatively uniform speed, and traffic volume is equal to or nearly equal to capacity and maneuverability is extremely difficult. The lowest LOS is "F" and is characterized by a volume that greatly exceeds the capacity and lengthy delays occur.

The traffic study showed that the major traffic routes parallel to the proposed Sugarloaf Parkway Extension, such as SR 20/Buford Drive and SR 324/Gravel Springs Road, would be carrying much higher traffic volumes in the design year compared to the existing and project opening years, and also experience levels of service E in the no-build condition in the design year. The Sugarloaf Parkway Extension expressway is anticipated to reduce traffic congestion on adjacent routes, namely SR 20/Buford Drive, SR 324/Gravel Springs Road, and Hamilton Mill Road. The proposed project expects to carry an estimated 34,500 vehicles per day (vpd) in 2025 and 42,125 vpd in 2045. For the roadway segment of Harbins Road, south of SR 316, the LOS stays at an "E" despite the increase in traffic volumes. It is worth noting that the intersection of SR 316 at Harbins Road will be grade-separated³, and the interchange is currently under construction. This new interchange will improve mobility at this location when compared to the no-build scenario.

SR 20/Buford Drive, south of I-85 shows an improvement from a LOS D in 2025 to a LOS C in 2045 in the no-build scenario. This improvement in LOS is due to Georgia DOT P.I. No. 0007850, which involves widening SR 20 from I-85 to Rock Springs Road from 4 to 8 lanes.

¹ Gwinnett County's most recent Comprehensive Transportation Plan can be found here: https://www.gwinnettcounty.com/static/departments/transportation/CTP/pdf/Destination2040_Needs%20Assessment%20Report_Mar2018_corrected.pdf

² Design year is usually twenty years from the Base (Opening) Year and represents the year for which the roadway is designed.

³ Grade separation is a method of aligning a junction of two or more roadway axes at different heights (grades) so that they will not disrupt the traffic flow on other transit routes when they cross each other.

The traffic will decrease in the build condition compared to the no-build condition in the design year by over 800 vpd on Old Fountain Road and by over 8,000 vpd on Old Peachtree Road.

It is anticipated that the traffic would improve on SR 316 from east of Collins Hill Road to west of Cedars Road due to P.I. Number 0013893, which involves constructing a new, grade-separated tight urban diamond interchange (TUDI) on SR 316 at Hi Hope Road and closing the existing access to SR 316 at Progress Center Avenue and Wimberly Way.

Although an interchange is under construction at SR 324/Gravel Springs Road and I-85, the traffic study showed that by the design year of 2045, the traffic would increase significantly on SR 324/Gravel Springs Road. The interchange of Sugarloaf Parkway Extension at I-85 would form a system-to-system interchange and provide the necessary regional connectivity to the freeway system while minimizing impacts to existing levels of service on I-85. Federal Highway Administration (FHWA) recently approved a detailed Interchange Justification Report (IJR) that included analysis showing that the Sugarloaf Parkway Extension interchange at I-85 and the collector-distributor (CD) system would improve the LOS at various ramp junctions and freeway segments along the I-85 mainline. Additionally, the IJR also demonstrated that the proposed Sugarloaf Parkway interchange at I-85 would improve the LOS for the arterial roadway segments and intersections. Finally, the safety and crash analysis prepared for the IJR concluded that the proposed project may significantly reduce the frequency and severity of the traffic collisions along I-85 and the roadways within the study area.

2. ***One commenter inquired how the project will help reduce traffic on Hamilton Mill Road or in the Buford/Sugar Hill area. One commenter supports the project if traffic congestion on Hamilton Mill Parkway is relieved as a result of the project.***

The project would enhance overall traffic movement in the eastern area of Gwinnett County by providing much-needed cross-county connectivity. The project would reduce traffic on Hamilton Mill Road and in the Buford/Sugar Hill area by diverting traffic from these areas to the Sugarloaf Parkway Extension. A traffic study conducted in the project area showed that the project would reduce the traffic on Hamilton Mill Road south of I-85, by over 4,000 vpd.

3. ***A few commenters would like a traffic study done for post COVID-19 traffic patterns to determine if the project is still necessary.***

Georgia DOT has developed a methodology to account for variations in traffic volumes due to COVID-19 for traffic projections done with data gathered during 2020 and 2021. However, the data gathered for this project was collected pre-COVID-19. Also, count stations statewide show that traffic levels have recovered to pre-COVID-19 levels and there is no indication of lasting effects on traffic patterns. The count stations in the vicinity of the project show June 2021 traffic volumes that are within 92 percent to 96 percent of pre-COVID-19 levels.

- 4. *One commenter asked if trucks will be allowed to utilize the extension. One commenter stated that this project will increase semi-truck traffic.***

The proposed project is intended for local and regional traffic, which would include semi-truck traffic. The project would be used as a bypass, thus diverting semi-truck traffic from existing roadways and improving safety. Truck traffic is expected to represent 5.5 percent of all traffic volumes on Sugarloaf Parkway, and 8.5 percent of traffic during peak hours.

- 5. *Several commenters were concerned with traffic along SR 124/Braselton Highway with and without the proposed project. These included: potential increase in traffic; difficulty accessing subdivisions; and school traffic creating congestion.***

Traffic projections for SR 124/Braselton Highway show an expected increase in traffic volumes by 24 percent to 37 percent due to the project. However, the volume on SR 124/Braselton Highway would be 10,850 vpd, east of the proposed interchange at Sugarloaf Parkway, and 8,650 vpd, west of the proposed interchange. These numbers are 25 percent and 37 percent higher than the projected growth without the construction of the project, and are well within the capacity of a two-lane undivided roadway.

- 6. *One commenter stated that Fence Road will not be able to handle the additional traffic created by the proposed interchange. They inquired if there are plans to widen Fence Road in the future to account for the increased traffic.***

Traffic on Fence Road is projected to increase over the no-build scenario by the design year of 2045. Traffic east of the interchange is projected to increase by 8,000 vpd, while traffic west of the interchange is projected to increase by less than 1,000 vpd; these volumes are within the capacity of a two-lane road. Widening Fence Road is outside of the scope of the proposed project. GCDOT will consider improvements to Fence Road for future roadway projects.

- 7. *One commenter stated that they hope the project has considered future growth in the area regarding traffic congestion.***

A traffic study was conducted that considers the future growth of the area in regard to future traffic congestion predictions. Atlanta Regional Commission's (ARC) activity-based model has been used to predict the future growth of the area.

- 8. *Many commenters are in support of the project due to the reduction in traffic volumes, increased connectivity, and reduction in crash rates.***

GCDOT and Georgia DOT appreciate the support for the project. We are committed to moving forward with the project to provide much needed cross-county connectivity, traffic reduction, and safety improvements.

- 9. *One commenter suggested that the proposed extension be widened to three or four-lanes in each direction to accommodate future traffic.***

Traffic projections show that traffic volumes on the proposed Sugarloaf Parkway Extension would reach 44,000 vpd by the year 2047, with a truck percentage of 5.5 percent. A four-lane freeway (two lanes in each direction) has a capacity of at least 70,000 vehicles before congestion becomes apparent, when truck percentages are 10 percent or lower. It has been determined that the roadway will perform more than adequately with two-lanes in each direction for the projected traffic volumes.

Comments Related to Roadway and Design

- 10. *Many comments proposed alternative routes for the project. These included: routes on SR 20, SR 124, SR 324/Gravel Springs Road, SR 316, and Dacula Road; shifting the alignment west along Hurricane Shoals Road; shifting the alignment to an industrial portion of Gwinnett County; and shifting the project to Barrow County.***

GCDOT and Georgia DOT considered multiple alternative routes for this project. The other routes explored included widening SR 20, SR 324/Gravel Springs Road, and Hamilton Mill Parkway. All of the alternatives were carefully considered and evaluated for the proposed need and purpose and overall impacts. The project's alternatives would require hundreds of residential displacements and impacts to major regional retail facilities.

Widening SR 316, SR 124/Braselton Highway, or Dacula Road, shifting the project to Barrow County, or shifting the project west along Hurricane Shoals Road would not meet the need and purpose of this project, which is to provide connectivity in Gwinnett County, reduce traffic congestion, and reduce crash rates along surrounding roads. Shifting the project west along Hurricane Shoals Road would displace more residences when compared to the current alignment.

GCDOT will keep the suggestions to widen SR 316, SR 124/Braselton Highway, and Dacula as the need arises when planning future roadway improvement projects.

- 11. *A few commenters inquired about road closures as a result of the project, specifically Hurricane Shoals Road and Old Peachtree Road, and if so, the road closures would create significant choke points.***

All roadways, including Hurricane Shoals Road and Old Peachtree Road, would remain open to traffic after the construction of the proposed project. The current alignment proposes to bridge Sugarloaf Parkway over both roadways.

- 12. *One commenter stated that the project would not provide Dacula residents access to an interchange.***

The proposed project would provide Dacula residents access to Sugarloaf Parkway from either the Fence Road or the SR 316 interchange. Dacula residents would have take either Dacula Road to the Fence Road interchange or Dacula Road to the SR 316 interchange.

- 13. *A few commenters asked where the interchanges would be located for this project. One commenter is not in support of the location of the proposed SR 124/Braselton Highway interchange.***

The proposed project would construct four interchanges at SR 316, Fence Road, SR 124/Braselton Highway, and I-85. At this time, the interchange is proposed at SR 124/Braselton Highway to provide access to Sugarloaf Parkway and to reduce traffic congestion. Please see the response to Comment #1 for the project's need and purpose.

- 14. *One commenter believes that the proposed speed limit is too high.***

Design speeds are mandated by the Georgia DOT Design Policy Manual⁴. Design speeds are to be set such that they are consistent with the speed drivers are traveling. On county roads and city streets, engineers work with local jurisdictions to set speed limits and design speeds that are consistent with this policy. Georgia DOT policy states, "It is desirable to select a design speed as high as practical to attain a desired degree of safety, mobility, and efficiency within the constraints of environmental quality, economics, aesthetics, and other social or political effects." This project will be designed to meet the appropriate safety criteria for the proposed speed limit. The currently proposed alignment is a limited access roadway, which would allow for higher travel speeds.

- 15. *One commenter stated that they do not want this project to create dead-end roads.***

The currently proposed alignment of the project does not create dead-end roads.

- 16. *A few commenters asked if this project would continue past I-85, and link to the Mall of Georgia, to create more connectivity.***

The northern terminus of the proposed project is I-85. Extending the project north past I-85 is outside of the scope of the project. Please see the response to Comment #1 for the project's need and purpose.

- 17. *Many commenters suggested improvements to Old Peachtree Road and the addition of turn lanes for subdivisions along Dacula Road, between Hurricane Shoals Road and Auburn Road, and along Auburn Road, between Fence Road and Dacula Road.***

Improvements to Old Peachtree Road, Gravel Springs Road, and the additional of turn lanes along Dacula Road and Auburn Road are outside of the scope of the proposed project. GCDOT will consider these improvements as the need arises for future roadway projects.

- 18. *One commenter stated that the proposed interchange with I-85 should not be a clover leaf, but should be a signalized intersection with short off ramps. Another commenter stated that the interchange at I-85 is poorly planned.***

The design of the I-85 has been developed to accommodate the needed traffic volume in accordance with FHWA's guidelines for interchange design configurations.

⁴ <http://www.dot.ga.gov/PS/DesignManuals>

- 19. *Many commenters are concerned for the safety of children and pets living in close proximity to the project.***

The proposed project is a limited-access roadway; therefore, a fence would be built between the roadway and residences, which would prevent direct access to the roadway from residences.

- 20. *One commenter suggested that all signalized intersections at SR 316 be grade-separated.***

The potential grade-separation of signalized intersections along SR 316 is outside of the scope of the Sugarloaf Parkway Extension project. However, GCDOT and Georgia DOT have on-going projects for the grade-separation of intersections along SR 316. Georgia DOT PI Nos. 0013893, 0013894, 0013895, 0013896, and 0013897 propose to grade-separate intersections from east of Hi-Hope Road to just west of Sugarloaf Parkway along SR 316. After the construction of these projects, there would be no remaining at-grade intersections along SR 316 from I-85 to Sugarloaf Parkway. Construction is expected to begin in 2023. For additional information on this project, please contact the project manager, Jonathan Digioia at jdigioia@dot.ga.gov.

- 21. *One commenter stated that the Twin Rivers Middle School intersection needs to be well planned to ease pickup/drop off.***

The current access to Twin Rivers Middle School would be relocated to a new road, Twin Rivers Access Road. The existing access would be closed and the new access would be from Lena Carter Road. Realigning the access to Twin Rivers Middle School would help ease congestion on SR 124/Braselton Highway.

- 22. *Commenters expressed their support of the proposed bridges in the project.***

Thank you for your support of the proposed bridges on the project. The intention of the design team is to carry all proposed bridges forward to the final design of the project. Although, the proposed project is subject to change during final design.

- 23. *One commenter suggested that the road be built entirely underground to reduce noise impacts.***

A noise study will be conducted as part of the environmental evaluation for this project. Noise mitigation, such as noise walls and vegetative buffers, will be considered. Building the proposed project entirely underground would be cost prohibitive.

- 24. *One commenter stated that there are not enough access routes for this project to be beneficial for residents in the area. The commenter stated that residents in the Hamilton Mill area would have to go to the proposed Fence Road interchange to access SR 316. The commenter, along with others, suggested interchanges be added at Old Fountain Road and Hurricane Shoals Road.***

Please see the response to Comment #1 for the project's need and purpose. Residents in the Hamilton Mill area can utilize the SR 124/Braselton Highway interchange with the proposed project as well as the Fence Road and I-85 interchange. Additional interchanges at Old Fountain Road and Hurricane Shoals Road are outside of the scope of this project.

25. *One commenter would like there to be no access to the Dacula community.*

The proposed project would provide connectivity through Gwinnett County, although there would be no additional access to Dacula as commuters can already access Dacula through Dacula Road, Hamilton Mill Parkway, Fence Road, or SR 324. The current access to Dacula, from the aforementioned roadways, would not be altered.

26. *One commenter asked if the current design plans will be altered during final design phase. Other commenters are concerned that the project will have adverse visual impacts.*

The proposed project design has not yet been finalized and could change in the final design phase. As the project progresses, an updated design will be presented to the public in the Public Hearing Open House (PHOH).

27. *One commenter stated that the project would be more beneficial if there was an interchange at Winder Highway instead of the proposed interchange at Fence Road. The commenter stated that this would have less impact on the community, noise levels, and traffic congestion.*

The access point for a Winder Highway interchange would be too close to SR 316. The proximity of Winder Highway to a railroad and uneven terrain around Winder Highway would make constructing an interchange infeasible and cost prohibitive.

28. *Many commenters requested a multi-use trail be added to the project design. Another commenter suggested tunnels be added to the trails to connect with other trails in the vicinity of the project.*

GCDOT is committed to developing multi-use trails as part of the CTP. A multi-use trail is proposed parallel to the proposed extension. Connecting the multi-use trail to existing trails in the area is being evaluated as part of the design. The trail and its connectivity to existing trails will be presented to the public during the PHOH.

29. *Several comments were inquisitive of Gwinnett County's maintenance, or lack thereof, of roadways.*

GCDOT patches and resurfaces approximately \$25 million of the County's roadways every year. GCDOT is committed to providing residents of Gwinnett County safe roadways. As such, Gwinnett County developed a CTP, Destination 2040, to provide a framework to improve the quality of life for everyone in the County by facilitating the mobility of people and goods safely and efficiently across all modes of transportation. The CTP assesses existing conditions, need for transportation improvements, and recommendations to improve and maintain roadways.

30. *Many commenters inquired about or are not in support of the Sugarloaf Parkway Extension becoming a toll road.*

The current plan does not include tolling the Sugarloaf Parkway Extension.

Comments Related to Accidents

31. *A few commenters asked if the project will increase full-speed collisions or all accidents. These commenters also requested statistical proof that the project will reduce traffic accidents of all kinds.*

Because Georgia DOT does not have a quantitative methodology for predicting future crash rates, the need to improve roadway safety must be inferred from the history of crashes on the corridor and from common sense predictions about how projected traffic growth will likely affect the frequency and severity of crashes in the future. The crash, injury, and fatality rates on the project area over the last 3 years of available crash data were compared to the statewide averages for similar classified roadways. The results showed that all facilities⁵ have crash rates, injury rates, and/or fatality rates that exceed the statewide averages.

Additionally, a study on the crash types within the project limits showed that most of the crashes were rear-end collisions, which is indicative of high levels of congestion. This type of collision is expected in corridors that experience congestion due to high volumes. The proposed Sugarloaf Parkway Extension project would reduce traffic volumes at several of these corridors, including Fence Road, Old Peachtree Road, Dacula Road, and Harbins Road. It is expected that, with the reduction of traffic volumes, congestion levels would decrease in these roadways and the pattern of rear-end collisions would reduce.

The second highest type of crash are angle collisions, which occur at intersections, signalized or unsignalized. These types of collisions may also be caused by congested roadways or can be caused by either geometric characteristics of the intersection and/or deficiencies in signal timing. If the higher-than-average crash rate persists after the traffic volumes and congestion have waned, other crash reductions measures would be considered.

32. *A few commenters said this project will create a safety risk for high school students around Mountain View High School. The students would be at an increased risk of accidents.*

The main point of conflict for the high school students is SR 124/Braselton Highway at Lena Carter Road intersection. A roundabout, among other safety improvements, is proposed for this intersection. Roundabouts reduce vehicle speeds and have proven to be an effective measure in reducing severe crashes. The traffic study showed that the project would have no effect on the LOS for the intersection of Sunny Hill Road at Lena Carter Road. The LOS in the design year on Lena Carter north of SR 124/Braselton Highway would improve from LOS “D” to LOS “C” due to the project. The design of the project is being planned following the current transportation safety standards.

⁵ Facilities analyzed for crash rates, injury rates, and fatality rates included SR 20, Harbins Road, Dacula Road, SR 324, Hamilton Mill Road, Fence Road, Old Peachtree Road, and Lawrenceville Suwanee Road.

- 33. *One commenter stated that the removal of the wooded areas will cause more accidents with displaced deer.***

Fences are proposed along both sides of the roadway to provide limited access. The fences could reduce the accidents caused by deer. In addition, if noise wall(s) or vegetative buffer(s) are proposed for abatement of noise impacts, they could also help reduce accidents. A noise study will be conducted as part of the environmental evaluation for this project, and noise mitigation, such as noise wall(s) and vegetative buffer(s), will be considered if feasible and reasonable wherever needed. Any proposed noise walls will be presented to the public during the PHOH.

- 34. *One commenter stated that there will be increased accidents on I-85 due to the short distance between the proposed Sugarloaf Parkway and I-85 interchange and the SR 324 and I-85 interchange.***

The distance between the interchanges and the merge and diverge ramps have been designed in accordance with the latest highway design standards. These standards take into account minimum distances between ramps so as to avoid any weaving problems or safety issues. Also, CD roads are being proposed on I-85 between the proposed Sugarloaf Parkway interchange and the SR 324/Gravel Springs Road interchange. All on-ramps and off-ramps would tie into the CD roads and not the I-85 mainline, which would further reduce friction with I-85 traffic. Please see the response to Comment #1 for the interchange justification.

Comments Related to Environmental and Community Impacts

- 35. *A few commenters inquired if an environmental impact study has been performed. Another commenter requested updated environmental studies be conducted for the project.***

Environmental impacts of this project, including impacts to the social, natural, historical, cultural, and physical environments, will be studied and summarized in a Draft Environmental Assessment (DEA). The purpose of the DEA would be to provide sufficient evidence and analysis for the lead federal agency (FHWA) to determine whether the proposed project will result in significant environmental impacts. The document will be prepared pursuant to the National Environmental Policy Act of 1969 (NEPA) and will be designed to meet the requirements of federal and state regulations relevant to the proposed project. If the DEA determines that the proposed project would have significant adverse impacts, an Environmental Impact Statement would be conducted to estimate the nature, severity, and duration of impacts that might occur and to compare the impacts of the proposal and alternatives. The DEA will be made available to the public 15 days prior to the PHOH.

- 36. *Many commenters are concerned that the project will diminish the quality of life of residents in Gwinnett County. Many commenters are worried about community cohesion, adverse community impacts, and the project bisecting communities. A few commenters stated that the construction of this project will negatively impact the residents in the area. One commenter stated that this project will cause a lack of privacy. One commenter stated that this project is beneficial and was planned to be the least disruptive to existing homes***

and communities. A few commenters stated that this road will be through an almost completely residential area.

Georgia DOT and GCDOT are committed to minimizing the impacts of the proposed project on communities. Efforts to avoid and minimize adverse effects on communities will be given consideration throughout project development. The identified communities in the project area, the effects they would incur, the avoidance and minimization measures that are considered, and the avoidance and minimization measures that are feasible to implement will be included in the DEA. Also, efforts to identify, involve, and avoid disproportionately high and adverse effects to minority and low-income populations, as mandated under a category of federal laws, regulations, and Executive Orders collectively known as "Environmental Justice (EJ)" would be studied. The approved DEA would be made available to the public 15 days prior to the PHOH. The public will have an opportunity to review and comment on the DEA until the end of the PHOH comment period, which at minimum lasts 10 days.

The current project design does not include bisecting any communities, or displacing/taking ROW from EJ communities. Moreover, since the majority of the land being used for this project has been preserved prior to many of the developments being built, this project would be the least impactful to communities among all alternative's studies, see the response to Comment #10 in Roadway and Design for the project's alternatives.

- 37. Many commenters are worried that noise levels will increase in the project area. Many have inquired about the potential for noise barriers. One commenter suggested vegetative buffers be used along the project corridor to minimize the need for noise barriers.***

A noise study will be conducted as part of the environmental evaluation for this project. Noise mitigation, such as noise wall(s) and vegetative buffer(s), will be considered if feasible and reasonable⁶ wherever needed. The decision on the installation of abatement measure(s) will be made after completion of the project's final design and the public involvement processes (including letters, public meetings, and phone conversations).

- 38. Many commenters are concerned that the project will negatively impact air quality. One commenter believes that the project will cause children to develop asthma.***

As part of the federal environmental process, an air quality analysis will be conducted to consider future air pollution impacts of the project. Once this analysis is complete, avoidance, minimization, and mitigation options will be considered. The air analysis, along with other environmental special studies, will be included in the DEA and will be made available for public review and comment.

- 39. A few commenters asked if there will be a public hearing/meeting for the project.***

A PHOH will be conducted for this project in the Preliminary Engineering Phase, giving the public the opportunity to review and comment on the DEA once approved by FHWA.

⁶ For more information regarding the 772.13 analysis of noise abatement please see Section 772.13 of FHWA Noise Standard - 23 CFR 772

<https://www.dot.state.mn.us/environment/noise/pdf/guidance/fhwa-noise-procedures.pdf>

- 40. *A few commenters are concerned that there will be more litter in the area as a result of the project.***

Due to the proposed project being a limited access expressway with no intersecting roads or traffic signals, the potential for littering is expected to be severely limited.

- 41. *Many commenters asked how the project will impact streams and wetlands. A few commenters asked if the road will be elevated above the wetlands to have minimal impact. A few commenters stated that this land has threatened Cucumber Magnolia trees, 150–200-year-old Beech, and various oak trees associated with a 100-foot elevation change. Many commenters were concerned with the number of woods and wildlife habitat that would have to be removed for the project's construction.***

Ecological surveys and reports will be completed to identify the natural resources such as streams, wetlands, invasive species, and threatened and endangered species and to determine the project's impacts on these resources. Upon identifying all natural resources and the project's impacts, efforts will be taken to minimize impacts to environmentally sensitive resources. If impacts cannot be avoided, measures to minimize and/or mitigate those impacts will be evaluated. The ecological analysis will be included in the DEA and will be made available for public review and comment.

GCDOT and Georgia DOT strive to protect environmental resources and measures would be taken to avoid and minimize tree clearing where possible. Gwinnett County is committed to maintaining parks and open spaces outlined in the 2040 Unified Plan⁷. To date, the County owns, maintains, and operates approximately 9,670 acres of park land.

- 42. *One commenter asked about the best management practices that will be used, along with the United States Army Corps of Engineers (USACE) permitting.***

The feasibility of best management practices (BMPs) such as the placement of grass channels, enhanced swales, infiltration trenches, stormwater wetlands, stormwater ponds, detention ponds, and filter strips will be evaluated in accordance with the county's general National Pollutant Discharge Elimination System (NPDES) Stormwater Permit. It is anticipated that an Individual Permit (IP) will be required for the project. The IP will be applied for from USACE during Final Design Phase.

- 43. *One commenter stated that the construction noise will be horrible.***

The Georgia DOT recognizes that minimizing construction noise is important; however, in the absence of standardized federal criteria for assessing construction noise impacts related to transportation projects (FHWA Construction Noise Handbook, 2006), it is necessary to primarily rely on the standards and requirements developed by local governments to determine the criteria to which contractors must adhere.

⁷ <https://www.gwinnettcountry.com/web/gwinnett/Departments/PlanningandDevelopment/Gwinnett2040UnifiedPlan>

In Georgia, contractors on all highway construction projects are required to adhere to GDOT Standard Specification Section 107.01 – Laws to Be Observed, which states in part, “The Contractor shall at all times observe and comply with all such laws, ordinances, codes, regulations, orders and decrees...” unless the necessary variance is obtained.

In order to further minimize construction noise, Georgia DOT’s Office of Environmental Services will provide the Project Manager and the design team the noise sensitive receptor information as early as possible during project development. This information would be used for the incorporation of construction noise control strategies in the project layout and design. For example, haul roads could be relocated to areas that would minimize construction vehicle noise exposure to noise sensitive receptors. The sequencing of construction activities and techniques could also be developed to minimize construction noise impacts. For example, permanent noise barriers included in project design could be constructed as early as possible, and daytime (or specified) hours could be required for certain activities.

44. Many commenters asked if the project would impact churches, businesses, and schools in the area.

The currently proposed design would not displace any churches, schools, or businesses. Other impacts will be analyzed in the forthcoming DEA and will be made available for public review and comment.

45. A few commenters are concerned that crime would increase as a result of increased access to subdivisions in the area. Another commenter stated that they will not feel safe to live in Dacula.

On average, when compared to the state of Georgia, Gwinnett County experiences lower crime rates (Georgia Bureau of Investigations Crime Statistics 2018⁸). A recent study conducted on the effect of traffic on crime rates has revealed that increased traffic has no effect on crimes including homicides and property crimes (Louis-Philippe Beland and Daniel A. Brent 2018⁹). Therefore, it is unlikely that the construction of the proposed project would increase the crime rates in Gwinnett County.

46. Several comments were made regarding the land use changes as a result of the proposed project. A few commenters inquired about the opportunity for businesses to open along the proposed project. One commenter stated that this project would increase high density residential areas and this will create increased traffic. Another commenter stated that this project would lead to increased industrial use of the area.

The proposed project is a limited access roadway; therefore, businesses will not be able to open along the roadway. An analysis of effects that assesses the proposed project’s potential contribution to changes in land use will be completed for this project and summarized in the DEA and will be made available for public review and comment.

⁸ <https://gbi.georgia.gov/services/crime-statistics>

⁹ https://www.lsu.edu/business/economics/files/workingpapers/pap17_02.pdf

47. Many commenters were concerned with the potential impact to historical sites.

A Historic Resources Survey was conducted to identify historical sites within the proposed project corridor. Three National Register of Historic Places (NRHP) eligible historic properties were identified during the survey, as concurred upon by the State Historic Preservation Officer (SHPO) on June 1, 2020. The impacts to these three NRHP-eligible sites will be analyzed during the next phase of the project in an Assessment of Effects (AOE) Report. The impacts will be included in the DEA and will be made available for public review and comment.

48. Many commenters stated that this project will interfere with drainage and runoff in the area.

As part of the design of the project, Georgia DOT strives to provide a drainage design that does not exacerbate existing downstream drainage structures and does not modify existing drainage patterns. Transportation projects are designed in such a way as to accommodate for drainage that will occur on the roadway.

Municipal Separate Stormwater Sewer Systems (MS4) control roadway runoff, which may contain pollutants that could enter the water table, by reducing the discharge of pollutants into streams and rivers to the maximum extent practicable to protect water quality. The current design of this project includes MS4 to adequately drain and treat stormwater.

49. Many commenters believe that this project would have a negative impact on Dacula residents.

The proposed project would benefit Dacula residents by decreasing traffic on surrounding roads, see the response to Comment #1 for the project's need and purpose. The design of the project would be the least impactful among the alternatives studied, see the response to Comment #10 in Roadway and Design for project's alternatives. Impacts to communities and residents in the project area will be assessed in the DEA. The impacts will be included in the DEA and will be made available for public review and comment.

50. One commenter suggested the project team meet with Homeowner's Associations (HOAs) in the project area.

Early Coordination letters were sent to HOAs in the project area on December 15, 2020 to identify communities and give them the opportunity to fully participate and provide meaningful input in the project development process.

Comments Related to Right-of-Way

51. Many commenters asked how many residences would be displaced as a result of this project.

Please note that the proposed project design has not yet been finalized, and there is a chance that the number of displacements could change during the final design phase. The current

alignment would displace twenty-four (24) residential properties. Efforts are on-going to minimize impacts to properties along the project corridor.

In the event that a portion of a parcel is required, a certified appraiser will make a fair market value appraisal of the area to be acquired, including any damages to the remainder land, if applicable.

52. *One commenter asked if the pool at the end of Wild Iris Lane will be impacted as a result of the project.*

The project as currently proposed would not impact the pool at the end of Wild Iris Lane.

53. *Many comments were received regarding property values in the area of the project. These include: the potential decrease of property values; reimbursement for loss of property value; County actions as a response to decreasing property values; the eventual increase of property values; and property values of homes within a 5 to 10-mile radius for projects of similar size and scope.*

Real estate market trends, not transportation projects, generally drive changes in property taxes and values. Although property values depend on many factors, it is believed that transportation improvements, in general, create a net positive benefit for the community at large. Studies in the US show that new connector may have an adverse impact on some properties, but in the aggregate, property values tend to increase with roadway development as home buyers are willing to pay for the increased access that the new roads provide¹⁰. Not all properties values are affected by a new roadway in the same way. Proximity to a new road was observed to have a negative effect on the value of detached single-family homes, but to have a positive effect on multifamily residential developments (e.g. condominiums) and most commercial properties¹¹.

In the event your property is required in total or in part, you will be contacted by the GCDOT, and a fair market value appraisal will be made of the area to be required, including any damages to the remainder land, if applicable. The appraisal will also include values for improvements required or damages that may be applicable. Should you be required to relocate as part of this project, a GCDOT representative will assist you during your relocation. Please note that the proposed project design has not yet been finalized, and right-of-way shown on the plans may be reduced or perhaps even eliminated in some areas.

Comments Related to Construction

54. *A few commenters stated that during construction of the project, traffic would increase.*

It is not anticipated that the proposed project would increase traffic during construction as this is a new location project.

¹⁰ <https://repository.asu.edu/attachments/74139/content/HighwaysPropertyValues.pdf> and https://escholarship.org/content/qt3t18n41x/qt3t18n41x_noSplash_f56b90128834391019252291b74b7ee9.pdf

¹¹ <https://repository.asu.edu/attachments/74139/content/HighwaysPropertyValues.pdf>

55. *One commenter asked how long the project would take to construct.*

The project is anticipated to take approximately three (3) to five (5) years to construct.

56. *One commenter suggested having a phased construction approach to minimize the impact on neighborhoods, specifically the noise-dust created during construction.*

Due to the nature of the proposed project, a phased approach is not feasible. Dust and noise created during construction will be minimized in accordance with Georgia DOT's Standard Specifications.

General Comments

57. *A few commenters asked when the project will go to construction.*

The construction of this project is currently in long-range program.

58. *Many commenters asked how the Sugarloaf Parkway Extension project will be funded. Many commenters were concerned that this project would increase their taxes.*

The project funds are allocated based on a cost estimate that is created using the proposed concept design needed to address the project's need and purpose. The cost needed for the proposed project is warranted for a project of this size and scope. The funding for this project has not been allocated, but taxes are not expected to rise as a result of the proposed project. It is anticipated that federal funding will be allocated for the construction of this project. The ARC allocates federal transportation funds based on priorities of the Metro-Atlanta governments as part of the Transportation Improvement Program (TIP)¹². The proposed project is a priority for GCDOT.

59. *One commenter would like a connector from Gwinnett County to Cobb County.*

Constructing a connector from Gwinnett County to Cobb County is outside of the scope of this project.

60. *Several commenters stated that this project is a revival of the Northern Arc/Outer Perimeter, which is opposed by the residents in the area. Another commenter asked if this project will continue on the original Northern Arc corridor to Fulton/Forsyth. One commenter stated that this project is happening 10 years late. One commenter inquired why the information is being presented to the public at this time.*

In the 1980's Gwinnett County and the state of Georgia recognized that there was a growing transportation need for cross-county connectivity in the Atlanta Metropolitan Region. The Outer Perimeter was proposed that would serve commuters and truck traffic that traveled circumferentially around Atlanta. An Environmental Impact Statement was completed, and right-of-way acquisition had begun on sections of the Outer Perimeter. Public opposition in adjacent counties and funding shortfalls caused the project to be dropped from Atlanta's

¹² <https://atlantaregional.org/transportation-mobility/transportation-planning/transportation-improvement-program/>

Regional Transportation Plan (RTP)¹³. However, Gwinnett County still had public support and continued to conduct corridor studies of the proposed circumferential route from the Dacula area to the Buford/Sugar Hill/Suwanee area. These studies identified that the lack of circumferential routes created traffic congestion on the radial freeways, principal arterials, and the two-lane circumferential routes. Additionally, it was identified that improving transportation access to and from regional commercial areas would benefit the County economically. Therefore, the Sugarloaf Parkway Extension project was proposed to extend Sugarloaf Parkway from SR 316 to I-85 to relieve congestion on surrounding arterial roads and to improve mobility between the northern (Buford/Sugar Hill/Suwanee area) and eastern (SR 316/Dacula area) regions of Gwinnett County.

The technical studies and the funding for such studies associated with the proposed project took some time to get to the current phase of the project. The virtual PIOH was conducted recently and the project information was presented to the public only upon having all the necessary materials ready as required by the Georgia DOT public involvement guidelines.

61. Multiple commenters suggested creating a bus or train system to travel through Gwinnett County.

Gwinnett County Transit (GCT) provides express, local, and paratransit services for the people of Gwinnett County. It operates six local bus routes and seven express routes into Fulton County. Three of the express routes operated by GCT are designated as Georgia Regional Transportation Authority (GRTA) routes.

As part of the Gwinnett County CTP, Gwinnett County is examining the current operation of GCT and identifying additional transit needs and opportunities within the County. Improving or adding public transit services (routes, bus stops, high-capacity transit with dedicated space, on-demand transit for people with mobility challenges, etc.) within Gwinnett County is one of the CTP priorities. Gwinnett County Transit has already begun to implement some short-term projects (e.g. Construction of Inland Pass, a park and ride facility, at SR 316 and Harbins Road interchange), but an ongoing Comprehensive Transit Development Plan will result in a mix of short-, medium-, and long-range recommendations for the growth and development of Gwinnett County's transit system.

62. Several comments were made regarding future development plans in Gwinnett County including, the opposition to new developments in the project area and how this project would coincide with the Rowen Research Center.

The development patterns in Gwinnett County are regulated by local land use and zoning laws. Please see Gwinnett County's 2040 Unified Plan¹⁴ for more information on future development or contact the Gwinnett County Department of Planning and Development at (678) 518-6000.

¹³ <https://documents.atlantaregional.com/The-Atlanta-Region-s-Plan/rtp2050/2050-rtp-main-doc.pdf>

¹⁴ <https://www.gwinnettcounty.com/web/gwinnett/Departments/PlanningandDevelopment/Gwinnett2040UnifiedPlan>

- 63. *Many commenters requested that a detailed map be included in the online platform for the PIOH. Commenters also expressed that the detailed map was difficult to find.***

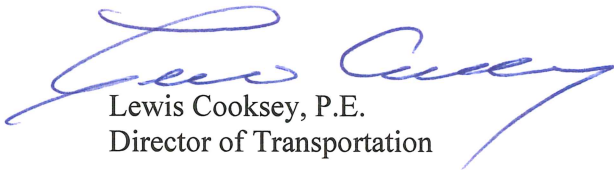
A detailed layout of the proposed project was provided as a PDF on the project's Georgia DOT Public Outreach webpage. GCDOT and Georgia DOT will take this comment into consideration for future outreach efforts.

- 64. *One commenter suggested improvements to Georgia DOT's Public Outreach webpage including, a shorter URL or a QR code, easier searching, graphics matching the postcard and the webpage, consistency in writing styles, map searches, and clear presentation of information.***

Thank you for your feedback; we will consider your suggestion for future public involvement outreach.

Again, thank you for your comments. Should you have further questions or comments, please call the Georgia DOT project manager, Albert Welch, at (404) 772-6969, GCDOT project manager, Tshaya Jackson, at (770) 822-7488, or the environmental analyst, Lauren Bolstad, at (678)-247-2637.

Sincerely,



Lewis Cooksey, P.E.
Director of Transportation

ED/AD/FM

cc: Rudy Bowen, GDOT Board Member (District 7)
Jamie Boswell, GDOT Board Member (District 10)
Chuck Efstration, State Representative (District 103)
Timothy Barr, State Representative (District 104)
Clint Dixon, State Senator (District 45)
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Lewis Cooksey, GCDOT Director
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Tshaya Jackson, GCDOT Project Manager
PDF for Project File