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August 16, 2022

Re: Responses to Open House Comments for PI Nos: 0017219, 0018363, and 0018361, Morgan, Walton, and Newton Counties, US 278 and Old Mill Road Improvement Projects

To Whom It May Concern,

Thank you for your comments concerning the proposed projects referenced above. We appreciate your participation and the input that was received as a result of the *June 14 and 15, 2022 Public Information Open Houses* (open house). Every written comment received, and verbal comment given to the court reporter will be made part of the official records for the projects.

A total of **1,564** people attended the open house, viewed the website or virtual room, or attended the live virtual meeting. A total of 84 comments were received during the comment period. The following is a breakdown of the comments received by project, where specified. In addition, 40 respondents did not specify a project in their comments:

PI No. 0017219 (US 278 Widening): Of the **21** respondents who formally commented on PI No. 0017219, **8** were in **support** of the project, **6** were **opposed**, **7** were **uncommitted**, and **0** expressed **conditional support**.

PI No. 0018363 (Frontage Road): Of the **17** respondents who formally commented on PI No. 0018363, **6** were in **support** of the project, **8** were **opposed**, **2** were **uncommitted**, and **1** expressed **conditional support**.

PI No. 0018361 (Old Mill Road Interchange): Of the **46** respondents who formally commented on PI No. 0018361, **8** were in **support** of the project, **15** were **opposed**, **15** were **uncommitted**, and **8** expressed **conditional support**.

The attendees of the open house and those persons sending in comments within the comment period raised the following questions. The Georgia Department of Transportation (Georgia DOT) 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. Comments are grouped by project, where applicable.

**Comments Specifically pertaining to PI No. 0017219, US 278 Widening:**

- *“Will there also be a stop light at the Frontage Road and US 278? This would make two stop lights close to one another?”*

Yes, there would be a stop light at the intersection of US 278 and Frontage Road to properly manage traffic throughout the corridor. The proposed stop light at US 278 and the Frontage Road meets Georgia DOT Design Standard for traffic signal spacing.

- *“Will there be a turning lane for southbound traffic turning from US 278 onto the proposed Frontage Road? Will this lane also be present for Employee Entrance Road (assuming the road cannot be shifted to a more suitable exit)?”*

There would be a southbound dedicated left-turn lane from US 278 onto the Frontage Road and another dedicated left-turn lane from US 278 into the Rivian employee entrance. These left-turn lanes would be discontinuous at each signalized intersection.

- *“Will the widening of US 278 ensure proper turn lanes and/or deceleration lanes?”*

Yes, turn lanes and deceleration lanes would be designed and constructed based on the needs identified in the traffic analysis for the project and the Georgia DOT Driveway Encroachment Manual.

- *“Will the Stanton Springs/US 278 exit be reworked? The intersection is dangerous.”*

The eastbound I-20 to US 278 off-ramp would be widened to three lanes and include a double left-turn lane. Each eastbound and westbound ramp intersection would be signalized, which would help mitigate any sight distance concerns by protecting left-turn movements. The intersection of US 278 and Shire Parkway would also have a signalized intersection and provide similar benefits.

- *“Commenters suggest that US 278 at I-20 (Exit 101) needs a traffic light due to low visibility of southbound traffic coming over the I-20 bridge and to alleviate the afternoon gridlock from high vehicular traffic.” Commenters encountering an increase of traffic coming from the construction of the META site making it difficult to exit I-20 westbound onto US 278 northbound and asking if the widening project includes stop lights at either side of the bridge?”*

As part of the proposed improvements, a traffic light is proposed at both intersections of US 278 with I-20. Traffic signals at these locations would help manage anticipated traffic volumes, improve traffic operations, and reduce congestion.

- *“Will the rural shoulder for the proposed US 278 widening be paved for bike access?”*

The shoulders proposed for the widened US 278 do not currently include paving for bicycle access. The rural area does not warrant bike lanes and the state route is not part of the State or Federal Bicycle Route System.

#### **Comments Specifically pertaining to PI No. 0018363, Frontage Road:**

- *“What are the effects of building the Frontage Road? Down gradient flooding, down gradient sediment and erosion, etc.”*

A drainage report was compiled for the project that examined the effects of the project on downstream flooding. No issues were found. Georgia law requires the project to contain all sediment on the project site. The Design-Build Team will be required to comply with the Georgia Environmental Protection Department’s standards including testing water in the stream to confirm that the project is not releasing sediment into downstream properties.

- *“Concern that the proposed Frontage Road will be used only by the economic developments in the area.”*

The proposed project would provide a direct connection between US 278 and Old Mill Road to accommodate future traffic and relieve anticipated congestion generated by major economic developments adjacent to the project area. There would be no limits of use of the proposed road and any motorist could access and utilize the proposed frontage road.

- *“Concern related to why the proposed Frontage Road begins at US 278 and ends at Sewell Road rather than extending to Old Mill Road.”*

The proposed Frontage Road project intersects with US 278 and extends to Old Mill Road. The PIOH layout consists of two sheets and the match line on the first sheet ends near Sewell Road; however, the second sheet shows that the interchange does tie into Old Mill Road.

#### **Comments Specifically pertaining to PI No. 0018361, Old Mill Road Interchange:**

- *“Can the traffic impact study for the Old Mill Road Interchange be made available to the public?”*

The Georgia DOT Concept Report, which contains the traffic information, is expected to be approved later this summer (August-September). Once this report is approved, Georgia DOT would make them available to the public via the Public Information website located here: <https://us278andoldmillroad-gdot.hub.arcgis.com>. Additionally, once approved by the Federal Highway Administration (FHWA) following approval of the environmental document, the Interchange Justification Report (IJR), which contains a complete analysis of Old Mill Road Interchange traffic impacts, will be added to the resources section of the project website at <https://us278andoldmillroad-gdot.hub.arcgis.com/>

- *“Who will maintain the roundabouts?”*

Georgia DOT would maintain the roundabouts at the Old Mill Road Interchange since that component would be within Georgia DOT right-of-way. However, some components within a Georgia DOT right-of-way, such as lighting within the roundabout, may be maintained by other agencies like the local municipality.

- *“Is the Interchange designed as a new exit? Commenters suggested making the US-278 exit larger rather than creating a new Old Mill Road exit.”*

Yes, the proposed new Old Mill Road Interchange is being designed as a new exit off I-20. An additional interchange at this location is proposed to increase accessibility to this area and reduce congestion at surrounding interchanges. Specifically, the proposed project would provide congestion relief for the existing I-20/US 278 Interchange to the west, which is not anticipated to have enough capacity to accommodate projected traffic volumes by the design year of 2045. Without the proposed new interchange at Old Mill Road, vehicles accessing the area’s major developments from I-20 must either use the US 278 Interchange to the west of Old Mill Road, or the Newborn Road Interchange with I-20 to the east.

Background growth and development is increasing traffic in the area, which would cause the US 278 Interchange to operate at very poor conditions by the design year (2045) without

improvements. The proposed new Old Mill Road Interchange would provide an additional route and more direct access for cars and trucks between I-20 and the Stanton Springs North development and would accommodate most traffic from the development to I-20, which would greatly reduce surface street traffic where these vehicles and trucks would otherwise conflict with typical everyday traffic. The current proposed design for the US 278 widening project shows enough modifications that could be achieved with the existing bridge in order to speed up construction and reduce overall costs. If it is determined that the US 278 Interchange must be further modified in the future, an additional project could be implemented to widen the US 278 bridge over I-20 to allow for additional capacity at the ramp terminal intersections.

- *“How will I-20 tie into Old Mill Road and the Frontage Road?”*

The proposed Old Mill Road Interchange is offset slightly to the west of where the existing Old Mill Road Bridge over I-20 is located. This proposed new interchange would have on- and off-ramps to and from I-20 with roundabouts at the ramp termini on either side of the new Old Mill Road Bridge. The realigned Old Mill Road would intersect the proposed Frontage Road at a new 4-legged, signalized intersection (with the fourth leg providing access into the Rivian facility).

- *“Can the design of the Old Mill Road Interchange be refined to avoid diverting traffic from the I-20 rest area to the new traffic circle south of the new interchange on Old Mill Road? It appears that the rest area traffic will be diverted south onto Old Mill Road. This will cause traffic congestion between traffic exiting eastbound I-20 and traffic leaving the rest area. Were there other design options explored?”*

Several different alternatives and configurations were considered for the proposed Old Mill Road ramps and the rest area exit. Various factors including safety, cost, and environmental impacts were also considered when developing the proposed configuration. The proposed configuration was the best alternative for providing safe travel for the rest area traffic to prevent conflicts between traffic entering I-20 from the rest area and traffic exiting onto Old Mill Road. It should be noted that the design has not been finalized and modifications may continue through the life of the project.

It is not the intent of the rest area traffic to utilize the proposed Old Mill Road Interchange to access Old Mill Road. Traffic exiting the rest area to travel along I-20 eastbound would merge with the eastbound off-ramp to the Old Mill Road Interchange and continue across the roundabout to continue onto eastbound I-20 rather than move north or south to reach Old Mill Road. This ramp is meant to provide travelers from the rest area safer access via an alternative route to access I-20 heading east.

Roundabouts have been demonstrated to provide a number of safety, operational, and other benefits when compared to other types of intersections. Specifically, they have fewer conflict points, compared to conventional at-grade intersections, lower speeds, and have been found to reduce crashes, crash severity, traffic delays, fuel consumption, and air pollution.

- *“What studies were done to determine that safety along Old Mill Road was a concern?”*

Historical crash data for 2015 through 2019 were obtained from the Georgia Electronic Accident Reporting System (GEARS) online. To complement the GEARS crash data, Georgia DOT's statewide average crash rates and roadway classifications were evaluated and compared to the data for project area roads. Based on this data, Old Mill Road crashes exceeded the statewide

averages for similar roadways for total crashes in 2018-2019 and for injury crashes in 2015, indicating a safety concern along Old Mill Road. This analysis was incorporated into the IJR for the Old Mill Road Interchange, which was accepted by the FHWA on May 25, 2022. Upon FHWA approval of the project's National Environmental Policy Act (NEPA) document, the IJR will be published and available on the project website at <https://us278andoldmillroad-gdot.hub.arcgis.com>.

- *“Old Mill Road should be disconnected from the Frontage Road and New Interchange location all together. I-20 and truck traffic should not have direct access to Old Mill Road.”*

Existing Old Mill Road would not connect to the proposed Frontage Road. Instead, the proposed new interchange at Old Mill Road would be constructed to the west of the existing Old Mill Road alignment and existing bridge over I-20, and it is the realigned Old Mill Road that would connect to the Frontage Road. The existing Old Mill Road would remain in its current location, but the existing bridge would be demolished, and cul-de-sacs constructed on existing Old Mill Road, north and south of I-20. Most truck traffic is anticipated to use the new Old Mill Road Interchange to access the development along the new Frontage Road. However, trucks with destinations north of the Frontage Road would continue to use Old Mill Road to access those destinations.

- *“Will there be noise or visual abatement along Old Mill Road?”*

During the design phase of a project, a Noise Study will be completed as part of the NEPA process, and noise impacts will be evaluated. The results from the study may propose abatement, such as the construction of noise walls if the consideration of noise abatement is feasible and reasonable as part of the project; however, before any final decisions are made concerning noise abatement, Georgia DOT will communicate directly with the affected property owners and ensure that a majority agree on a proposed solution. Noise studies are currently underway for the proposed Old Mill Road Interchange project. There are no current plans for visual abatement along Old Mill Road.

- *“Commenter has concern about increased noise around Davis Academy Road if Old Mill Road Interchange is not completed prior to Rivian construction.”*

The IJR for the project indicates that there would be increased traffic at Davis Academy Road during 2023 because the proposed new Old Mill Road Interchange would not begin construction until one year after the Rivian construction would begin. Increased traffic in the area for 2023 could bring some level of noise increases; however, this would be a temporary condition until the proposed Old Mill Road Interchange project is open to traffic.

- *“What are the current traffic and future traffic numbers used to justify this new exit? Are they available for public record?”*

The existing and future traffic year demands for roads in the project area were thoroughly studied by the project team. Current traffic volumes at US 278 consists of 5,850 vehicles per day (vpd) and are expected to increase to 15,800 vpd in the open year (2025) and 18,100 vpd in the design year (2045) No-Build condition. The daily traffic volume along Old Mill Road is currently 350 vpd and would increase to 2,300 vpd in the open year and 2,950 in the design year under the No-Build condition.

Without the proposed new interchange, six area intersections are expected to experience failing (Level of Service [LOS] F) or near-failing (LOS E) operations by the design year (2045) under No-Build conditions. These intersections along with their type of control (either a traffic signal or a two-way stop control [TWSC]) include:

- US 278 at I-20 eastbound ramps (Signalized)
- US 278 at I-20 westbound ramps (Signalized)
- US 278 at Stanton Grove Driveway/Frontage Road (Signalized)
- US 278 at Walter Shepherd Road (TWSC)
- Old Mill Road at Newborn Road (TWSC)
- Newborn Road at I-20 westbound ramps (TWSC)

It is anticipated that traffic patterns along US 278 would generally remain the same, but volumes would increase due to general growth as a result of planned economic developments in the area. Therefore, a new access point to I-20 is warranted. It is anticipated that traffic traveling to the new development on the north side of I-20 would likely use the proposed new Old Mill Road Interchange, which would provide a direct connection to the new development. Providing additional capacity would help to keep new and increased traffic off the existing local roads, while providing them a new dedicated route to these new areas.

- *“How far north on Old Mill Road will the widening extend? Will Old Mill Road be widened to Davis Academy Road? Suggest that the widened road & plant truck traffic should be diverted west at least 500 hundred yards south of the Davis cemetery.”*

The proposed improvements tie into existing Old Mill Road approximately 1,300 feet (1/4 mile) south of Davis Academy intersection. Currently, there are no plans for widening or construction at the Davis Cemetery.

- *“Will the new entrances from the south of I-20 and exits that meet at existing Old Mill Road go over Old Mill?” Where will those ramps be in proximity to the existing Old Mill Bridge?*

The proposed new interchange at Old Mill Road would be constructed to the west of the existing Old Mill Road alignment and existing bridge over I-20. The roadway approaches to the new interchange would be constructed on new location west of existing Old Mill Road. While the new bridge is under construction, the existing Old Mill Road and its bridge would maintain access across I-20 (where vehicles currently travel). Once the new bridge and roadway approaches are completed, the new location would be opened, the old (existing) bridge over I-20 would be closed and removed, and two cul-de-sacs would be constructed on existing Old Mill Road to the north and south of I-20 to allow people to still access the properties along existing Old Mill Road.

- *“Please explain the Public Hearing process for the Old Mill Road Interchange project. What will occur during this hearing?”*

The Public Hearing Open House (PHOH) is a legal (required by state law and federal regulations) meeting held by Georgia DOT. A PHOH is conducted as an “open forum meeting” allowing the public to attend to discuss the project with Georgia DOT representatives, to ask questions, and to make comments. There are no formal presentations unless prior approval has been received from the Georgia DOT Director of Engineering. The approved NEPA document would be made available to the public for 15 days prior to the PHOH and would be available for review at the hearing.

- *“How close is the offset of the proposed Old Mill relocated roadway to my property? I thought it could only be 150 feet behind the back of the house.”*

The current design for the Old Mill Road Interchange, PI No. 0018361, is offset over 150 feet from the residence on this property at 1890 Old Mill Road and the physical roadway more than 200 feet from the residence of this commentor. This project is anticipated to require right-of-way acquisition involving property purchased from private landowners; however, specific property impacts have not yet been determined. Early right-of-way activities for this project are anticipated to begin during Q4 2022.

- *“The new widened road can’t encroach on our land south & east of the cemetery that is in a permanent Conservation Easement.”*

The Georgia DOT will make efforts to minimize property impacts, but if property impacts do include property located within a conservation easement, those easements and obligations associated with the easements will be addressed in the right-of-way acquisition phase.

**General or Unspecified Comments, or Comments pertaining to All Projects (projects or project):**

- *“Commenters concerned with the promotion of vehicular traffic rather than green/public transportation options like trains, buses, etc.”*

The Morgan County Transit System provides public transportation for all people with the purpose of enabling those in Morgan County who do not have proper daily transportation access for work and personal needs. This service exists in the vicinity of the project area and is available to anyone in Morgan County for trips within the county. For more information, please visit [Transit | Morgan County, GA - Official Website \(morgancountyga.gov\)](https://www.morgancountyga.gov/transit). Additionally, Georgia DOT’s “Let’s Ride” app connects rural transit riders to their local transit providers statewide by allowing riders to book trips in advance on their local area’s rural transit service, providing rural transit riders further access to jobs, healthcare and more. For more information and instructions on how to download and use the app, visit [Let’s Ride \(arcgis.com\)](https://arcgis.com)

- *“What is the construction timeline for all three projects? Will the Old Mill Road Interchange be open to traffic prior to Rivian construction?”*

The proposed Frontage Road project (PI No.0018363) is scheduled to begin construction in Q3 2023, with substantial completion by 2024. The proposed US 278 Widening project (PI No. 0017219) is scheduled to begin construction in 2023, with substantial completion by 2024. The proposed Old Mill Road Interchange project (PI No. 0018361) is scheduled to begin construction in 2024, with substantial completion by 2025. The Rivian facility is anticipated to be open by 2024, prior to the completion of construction of the Old Mill Road Interchange.

- *“What is the status of right-of-way acquisition for all three projects?”*

Right-of-way pre-acquisition activities are currently underway for the proposed US 278 Widening project (PI No. 0017219) and acquisition is anticipated to begin in Q3 2022. Right-of-way activities are anticipated to begin in Q4 2022 for the Frontage Road project (PI No. 0018363). Early right-of-way activities are anticipated to begin in Q4 2022 for the Old Mill Road Interchange (PI No. 0018361).

- *“Who will be maintaining the right-of-way for each transportation project?”*

The US 278 and Old Mill Road Interchange projects are allocated within Georgia DOT maintained right-of-way. The Frontage Road project would be constructed by Georgia DOT; however, once constructed, the road would be maintained by the Joint Development Authority (JDA) of Jasper, Morgan, Newton, and Walton Counties.

- *“Comment about a sign that was not removed after the US 278 Expansion project was completed from across the Alcovy Community.”*

Thank you for bringing this to our attention. All signs related to construction have been removed from the project limits; however, there is permit work for Eastside High School currently underway near the Alcovy Crossing neighborhood, which will be perpendicular to the entrance of that neighborhood.

- *“Who oversees billboards within the state along state owned roads?”*

Billboards along state-owned roads and highways are privately owned; however, the Georgia DOT Outdoor Advertising/Office of Maintenance and City/County Zoning Ordinances is responsible for regulatory oversight.

- *“Commenters wonder how this transportation project would help bring jobs (long term and short term) to the area or benefit the local economy.”*

Georgia DOT is committed to supporting state economic development opportunities. With the advancement of planned economic development in the area, there is a need to provide roadway enhancements and improvements that offer safe and reliable access to the new development, as well as reduce potential future traffic congestion and improve the surrounding infrastructure for all users, including the local communities it serves. The proposed new infrastructure would support expansion/development of businesses bringing jobs to the area.

- *“What is an alternative Design-Build delivery method?”*

Design-Build is a method of project delivery in which one entity – the Design-Build Team – works under a single contract with Georgia DOT to provide design and construction services. This method allows for greater efficiencies in project delivery, which typically results in accelerated project schedules.

- *“Why do Georgia DOT projects take so long to get to construction?”*

Georgia DOT projects go through an extensive project development process called the Plan Development Process (PDP). From Concept Development to Let to Construction, proposed



projects go through a rigorous analysis to ensure that the projects meet the need and purpose of the area while also maintaining compliance with various Federal and State laws and regulations.

For these three proposed projects, the Design-Build delivery method is being utilized to accelerate the project schedules. The Design-Build delivery method helps accelerate projects because right-of-way acquisition, processing permits, and the project design can all occur concurrently with construction. In Design-Build delivery, the design and construction phases of a project are essentially overlapped, whereas in traditional project delivery, design activities occur prior to construction. Benefits to the public include reducing construction times, mitigating travel impacts as much as possible, and maximizing the use of resources and the project budget.

- *“The state isn’t even considering these options after giving Rivian \$1.5 billion of our taxes and then cutting the taxes they will pay. Commentors expressing concern that these transportation projects are a poor use of taxpayer money.”*

It’s part of Georgia DOT’s mission to boost the state’s position as a global commerce hub and strengthen the competitiveness of rural Georgia. Georgia DOT investments improve safety and take care of Georgia’s existing transportation system, as well as system expansion to support economic development opportunities.

With the advancement of the Stanton Springs North development, there is a need to provide roadway enhancements and improvements that offer safe and reliable access that boosts the surrounding infrastructure for all users.

- *“The increase in traffic volumes and new residents moving into the area will inevitably result in an increase of traffic accidents requiring emergency services response.”*

In general, the proposed transportation projects would provide options that enable and facilitate operations for all vehicles, including emergency vehicles in the area. Coordination with emergency first responders is generally conducted as part of the project design process.

The main purpose of the proposed projects is to address future traffic congestion anticipated from current and future development by providing capacity augmentation and access improvements in the area. Overall traffic operations and traffic safety are expected to improve with implementation of the projects. The proposed new Old Mill Road Interchange would provide an additional route and more direct access for trucks to I-20 and Stanton Springs North and handle most traffic from the development to I-20, which would greatly reduce surface street traffic where these vehicles and trucks would otherwise conflict with typical everyday traffic. Additionally, rerouting traffic from the US 278 corridor and interchange, where there would be multiple traffic signals in the future conditions, to the Old Mill Road corridor and interchange, where there are roundabouts, would result in fewer crashes and would provide a safety benefit to the area when compared to traditional intersections. Roundabouts have fewer conflict points and are designed to lower speeds. The proposed roundabouts are designed for speeds of 20 to 30 miles per hour (mph).

- *“What would be the daily construction timeline be for the area? Would construction be ongoing 24/7 throughout?”*

The daily construction schedule for these projects would be determined by the Design-Build Team in coordination with Georgia DOT after the project is Let to Construction.

- *“What is a multi-use path? How was the multi-use path location determined? What is a Complete Street? Commenters suggest that sidewalks/multi-use trails be provided wherever possible to improve connectivity between the existing Hard Labor Creek State Park facilities and any public facing facilities in Stanton Springs/Stanton Springs north including potential public trails at Stanton Springs and Stanton Springs north.”*

A multi-use path is a path designed for varying transportation purposes (including pedestrians and bicycles) that is typically physically separated from motor vehicle traffic by an open space or barrier. These are typically wider than a standard sidewalk, which has a minimum width of five feet, and are different from “recreation trails” which Georgia DOT defines as trails that are designed primarily for a recreation experience and for walking speeds (Georgia DOT Pedestrian and Streetscape Guide, page 7-9).

Georgia DOT’s Complete Streets Policy states that applicable projects will incorporate bicycle and pedestrian facilities into designs as appropriate in order to improve mobility, access, and safety for the public. Georgia DOT coordinates with local governments to ensure that pedestrian and bicyclists’ needs are addressed throughout the planning, design and construction of projects. The Design Policy Manual provides standards and guidelines for bicycle warrants (Section 9.4).

Currently, the only multi-use path proposed as part of these projects is located along the northern side of the proposed Frontage Road (PI No. 0018363) for the length of the project corridor. The location of this path was determined in coordination with the JDA and the Rivian development representatives.

- *“Semi-trucks routinely stop on the acceleration ramp every night. How will Georgia DOT mitigate that overflow of this rest area? Who is going to enforce the laws here?”*

The proposed projects do not include improvements or enhancements to the existing rest area. Vehicles, commercial or otherwise, would still have the same ingress and egress access to the rest area. Local law enforcement for those jurisdictions would be responsible for ensuring that commercial vehicles utilize the rest area and ramps appropriately.

- *“Commenters showed concern that the transportation projects will only bring more motorists and larger vehicular traffic to the area and ultimately create a traffic congestion issue for the area especially along locally used roads that travel through Hard Labor State Creek Park.”*

Future traffic volumes on Old Mill Road north of US 278 toward Hard Labor Creek State Park are not expected to increase according to the IJR completed for the proposed interchange. The proposed widening of US 278 and proposed construction of the Frontage Road are intended to reduce traffic congestion and improve traffic flow in the area of existing and planned developments near I-20. The proposed new interchange at Old Mill Road would reroute some of the anticipated future traffic from area developments and local roads to the new interchange, improving operations at the existing interchanges of US 278 and Newborn Road with I-20.

- *“Commenters showed concern about lighting choices that could impact the Hard Labor Creek State Park telescope, bats, and migrating birds, and local residents and suggest using “dark sky compliant” lighting along the Old Mill project corridor in addition to general concerns about the type of lighting that would be used for the proposed projects as that could impact navigating birds and bats.”*

Ecology studies completed as part of the NEPA and the Georgia Environmental Policy Act (GEPA) processes did not identify any current federally protected bat species in the corridor for all three projects. However, there are several other bat species that do reside in the area and the use of down-lighting will be taken into consideration for the proposed Old Mill Road Interchange project. Down-lighting on light poles, which consists of placing caps over the top half of lights to reduce ambient light and direct light downward is an option that Georgia DOT has implemented on past projects. Georgia DOT is considering general lighting options for the proposed Old Mill Road Interchange project. Georgia DOT standard specifications would be utilized during construction to prevent harm to nesting migratory birds.

Lighting for the US 278 and Frontage Road projects would be installed by a third party. The type of permanent lighting proposed is consistent with the existing lighting constructed as part of the Stanton Springs South development south of I-20, which consists of downward facing lights.

- *“How will trucks access the new development if there are signs indicating trucks are not allowed to travel through Hard Labor State Park?”*

Trucks would mainly be accessing the development from I-20 and the proposed Frontage Road from the southern portion of the site development. This signage restricting trucks in Hard Labor State Park would not be changed as part of the proposed project.

- *“Concern that the cul-de-sacs on the northern and southern end of Old Mill will increase the amount of littering and garbage dumping along the road. “*

Construction of cul-de-sacs on Old Mill Road on each side of I-20 would be expected to decrease use of existing Old Mill Road in this area due to the lack of through connection. Therefore, it is not anticipated that littering would increase along the road. Littering is unlawful in Georgia, and violations should be reported to the local law enforcement agency.

- *“Morgan County zoning and development regulations do not permit cul-de-sacs to be on a road longer than 1,500 feet and both the northern and southern cul-de-sacs would be that long and longer.”*

Georgia DOT would acquire the right-of-way at this location. Georgia DOT is not subject to the requirements of the Morgan County zoning and development regulations pertaining to these transportation projects.

- *“Does the design accommodate the two new railroad crossings being proposed for the Rivian development? Does Georgia DOT have a plan to prevent trains from blocking US 278 for extended periods of time at the two railroad crossings proposed for the economic development in the area?”*

Georgia DOT’s proposed PI No. 0019253, SR 12 From East Hightower Trail to West Dixie Highway at 2 New CSX Locations, would construct a grade separation at two crossings in this

area that would prevent trains from blocking traffic at US 278. This project is separate from US 278, Frontage Road, and Old Mill Road projects and would Let to Construction in December 2023.

- *“Commenters have concern over the economic development/growth of the area that will result from the transportation projects.”*

Economic growth is occurring in the area regardless of the proposed projects. The JDA of Jasper, Morgan, Newton, and Walton Counties was formed in 1999 to create an industrial area to attract industry to the region. In the area of the proposed projects, the JDA has successfully developed a portion of the Stanton Springs site, a 1,600-acre industrial park south of I-20 and east of US 278 and has plans to substantially expand this development over the next 20 years to include approximately 5.3 million square feet (SF) of data centers. Additionally, the JDA has plans to develop an approximately 1,978-acre site north of I-20 and east of US 278 into what would be called Stanton Springs North, and the Stanton Grove site north of I-20 on the west side of US 278, which is planned to include a mixed-used development with 1.1 million SF of industrial use, 275,000 SF of leasable shopping area, along with hotels, apartments, restaurants, and gas stations. These developments are anticipated to increase passenger vehicle and truck traffic within the project area and increase the number of vehicles and trucks needing access to I-20; the proposed projects would help to address these concerns.

- *“Proposed Georgia DOT projects are not standalone and would not be needed if it weren’t for the Rivian Plant construction.”*

The purposes of the proposed Georgia DOT projects are to provide new, direct vehicular access to I-20, reduce congestion and improve operations along US 278 in the vicinity of I-20, and provide direct access between US 278 and Old Mill Road, which would serve current and projected future vehicular and truck traffic. These projects are needed due to the increase in traffic associated with the overall growth of the area, specifically, several major economic developments in the immediate area of the proposed transportation projects that have been recently constructed or are planned for construction soon. The proposed transportation projects would provide congestion relief along the US 278 corridor, which is not anticipated to have enough capacity to accommodate projected traffic volumes by 2045. Additionally, rerouting traffic from the US 278 corridor and interchange, where there would be multiple traffic signals in the future conditions, to the Old Mill Road corridor and interchange, where there are roundabouts, would result in fewer total crashes and a safety benefit.

- *“Who makes the decisions regarding naming an intersection? Is there a way to make a request?”*

The Georgia General Assembly adopts road dedication resolutions to honor or memorialize outstanding individuals and organizations. These road dedication resolutions are sponsored by a State Senator or State Representative and are limited to the State Highway system.

The individual or group requesting the dedication works with their legislator and provides background information about the road dedication honorees and the exact location of the dedication.

- *“Why is Georgia DOT preemptively trying to construct transportation projects prior to the economic developments being completed? What if the developments aren’t constructed due to legal action?”*

Georgia DOT strives to be proactive in terms of planning transportation improvement projects. According to land use interviews conducted as part of the NEPA process for the proposed new interchange, economic development in this area has been in the planning stages for over 20 years with some areas already developed and continuing to be developed. The recent, planned, and expanding developments in the area are anticipated to increase passenger vehicle and truck traffic within the project area and increase the number of vehicles and trucks needing access to I-20, and the proposed projects would help address these concerns.

- *“Old Mill Road is already like the autobahn as people move from Oconee County and north Morgan County to get to I-20. Old Mill would become a major road, but it is fed by Fairplay Road going through Hard Labor Creek State Park and that is a very dangerous road when there is a lot of traffic and high speeds.”*

Existing Old Mill Road would not be widened as part of the proposed (PI No. 0018361) Old Mill Road Interchange project. Based on the IJR for the project, increases in traffic volumes are not expected to occur north of US 278 through Hard Labor Creek State Park under either the Build or No-Build condition.

- *“Why is there no public hearing period for the 278 Widening and the I-20 Frontage Road projects?”*

State and federal laws require public hearings to be held as part of the NEPA process after a Draft Environmental Assessment (EA) or a Draft Environmental Impact Statement (DEIS) is signed by FHWA, or after the Georgia DOT Commissioner approves an Environmental Effects Report if at least 100 citizens request a hearing, whichever is appropriate. The US 278 Widening and Frontage Road projects do not meet the state requirements to require a public hearing.

- *“Why weren’t the other potential alignments shown at the Public Information Open House (PIOH) sessions for the public to vote on?”*

Different project alternatives were studied in the IJR completed for the proposed Old Mill Road Interchange; however, the preferred alternative was presented and discussed in detail at the PIOHs. Any comments that the public has on the interchange alignment will be taken into consideration and there will be a PHOH for the proposed Old Mill Road Interchange project, currently scheduled for Q2 2023. The IJR would be approved when the environmental document is approved after the PHOH is held.

- *“Commenters concerned about the impacts of these projects downstream to surrounding Georgia lakes and rivers.”*

As part of the design of a project, Georgia DOT strives to provide a drainage design that does not exacerbate existing downstream drainage structures and does not modify existing drainage patterns. Inlets and pipes are designed to handle a 10-year storm.

A project’s design will provide adequate stormwater drainage by including features, such as cross drainpipes, roadside ditches, and curb inlets. These design features will help to reduce impacts

to water quality from roadway runoff by directing untreated stormwater away from rivers, streams, and water bodies and into rip-pads or grassed swales, thereby slowing the infiltration rates and providing a level of natural filtration.

- *“Where can you find the PI layouts?”*

The project layouts can be found online on the Georgia DOT public involvement website (<https://us278andoldmillroad-gdot.hub.arcgis.com/>). Additionally, hard copies are available at the local Georgia DOT District 2 Madison Area Office located at 1570 Bethany Road.

- *“What are the proposed impacts to the water resources where the new location Frontage Road is proposed?”*

The total area of direct impacts to waters from the proposed (PI No. 0018363) Frontage Road project, based on current design, is approximately 0.063 acre.

- *“Mitigation of wetlands and other environmentally impacted areas should be minimized, and any offsite mitigation should be kept as local as possible.”*

During the environmental review process, Georgia DOT will attempt to avoid, minimize, and mitigate impacts to environmental resources while following all federal, state, and local laws. Environmental assessment of effects reports for these projects are currently in development; therefore, specific project impacts to resources have not yet been fully defined.

If mitigation is needed, it would occur within the watershed of the affected resource. Mitigation banking is performed “off-site,” meaning it is at a location not on or immediately adjacent to the site of impacts, but within the same watershed.

- *“Please consider all historical research and information, while also doing your due diligence to make sure a vital part of our history, and Native American history, is not negatively impacted.”*

Georgia DOT’s cultural resources documents are prepared for use in completion of applicable Section 106 procedures in compliance with the National Historic Preservation Act (NHPA) of 1966 and subsequent agreements, as well as in accordance with OCGA 12-16-1 and Georgia DOT’s policy 4415-10(C). Particularly, the documents are developed in accordance with the Section 106 Programmatic Agreement (PA) between the FHWA, the United States Army Corps of Engineers (USACE), the Advisory Council on Historic Preservation (ACHP), the State Historic Preservation Officer (SHPO), and the Georgia DOT.

Section 106 requires federal agencies to consider the effects on historic properties of projects they carry out, assist, fund, permit, license, or approve throughout the country. Project historians and archaeologists identify properties that may be affected by the project and determine if the property or properties are historic as determined by eligibility or listing in the National Register of Historic Places (NRHP). Then the effects of the undertaking are assessed on the resources in consultation with consulting parties. Determining adverse effects on historic properties is based on criteria established by 36 CFR Part 800 of the ACHP regulations. Finally, if the project would adversely affect eligible or listed NRHP properties, the agency will resolve adverse effects by developing and evaluating alternatives that could avoid, minimize, or mitigate these impacts on historic properties. The result of consultation may be a Memorandum of Agreement (MOA) or a

Programmatic Agreement (PA). The MOA or PA is a legally binding document, which evidences the agency's compliance with Section 106 and records the outcome of consultation and the effects of an agency's undertaking on historic properties.

GEPA is similar in scope and intent to Section 106 but applies to state agency undertakings. It is designed to afford planning protections to significant cultural resources that may be impacted by a state agency's actions, including funding or grants. For Georgia DOT projects, GEPA is satisfied through Section 106 consultation for federal-aid or federally permitted projects. If there is no federal involvement, cultural resources consultation is completed specifically to comply with GEPA. Georgia DOT's GEPA process is closely modeled on the Section 106 compliance process and includes similar methods for consultation, resource identification, effects assessment, and avoidance, minimization, and mitigation of adverse effects to cultural resources.

- *“Can the right-of-way pamphlet be made available to the public? The website doesn't include it in a downloadable format.”*

Yes, the project website has been updated to include a downloadable right-of-way pamphlet (<https://us278andoldmillroad-gdot.hub.arcgis.com/>). Additionally, a PDF of the right-of-way pamphlet can be accessed at the link below  
<http://www.dot.ga.gov/PartnerSmart/Public/Documents/Right-of-Way/ROWBrochure-English.pdf>

- *“Is there a way to be notified about future Georgia DOT projects?”*

The project team has developed a contact spreadsheet for stakeholders and the public. Please send your contact information to [US278andOldMillRoad@dot.ga.gov](mailto:US278andOldMillRoad@dot.ga.gov) to be added to the database and receive updates on these projects.

For general Georgia DOT projects, we encourage you to visit Georgia DOT's The Network at [The Network \(ga.gov\)](http://www.dot.ga.gov) or <http://www.dot.ga.gov/aboutgdot/thenetwork> or follow us on social media: ([Facebook](#) or <https://www.facebook.com/login/?next=https%3A%2F%2Fwww.facebook.com%2FGDOTEast>, [Twitter](#) or <https://twitter.com/GADeptofTrans>, [Instagram](#) or <https://www.instagram.com/gadepoftoftrans/?igshid=YmMyMTA2M2Y%3D>) for weekly project alerts. For District 2 specific projects, you can visit [D2 \(ga.gov\)](http://www.dot.ga.gov) or <http://www.dot.ga.gov/AboutGDOT/Districts/District2> for contacts, resources, and key projects.

- *“How can projects move forward without the USACE approvals for environmental impacts being completed?”*

Construction within jurisdictional waters of the United States would not be permitted to begin until all applicable USACE concurrences are received, and necessary permits are approved/issued.

- *“Concerns with impacts to cattle and other farm animals as a result of construction and resulting transportation impacts (lighting, pollution, noise, etc.).”*

While the area is currently agricultural, the area north of I-20 between US 278 and Old Mill Road is actively being acquired by the JDA and Rivian for the Stanton Springs North development. As a result, the entire area would be cleared, and farm animals would be removed prior to any construction on the proposed Georgia DOT projects. The new proposed interchange would be constructed to the west of existing Old Mill Road, very close to the Stanton Springs North

development (Rivian Facility), and the rest area along I-20, which is already lighted. Existing Old Mill Road will remain at its current location.

- *“Why do maps look like the Rivian or Georgia DOT land goes to the east of Old Mill as it gets close to Davis Academy?”*

The figure in question was prepared by the JDA and Rivian for the Stanton Springs North development, which covers a larger area than the transportation improvements being proposed by the Georgia DOT. Georgia DOT project layouts neither propose the need for right-of-way nor have proposed construction to the east of Old Mill Road. Georgia DOT recommends that you review the public involvement materials in order to see an accurate representation of the project layout with respect to properties in this area.

Any questions about the Rivian project should be directed to the Georgia Department of Economic Development & Rivian at [rivian@georgia.org](mailto:rivian@georgia.org).

- *“What is the Georgia DOT process for acquiring land designated as Conservation Easement? Is any of that type of land being acquired?”*

Georgia DOT will perform title searches for all properties acquired and will clear any recorded easement at the time of closing. If conservation easements exist on any Georgia DOT acquired properties, they will be addressed at that time. Title searches have only been performed on properties that would be impacted by the US 278 Widening project (PI No. 0017219). Currently, no known conservation easements are on those properties. Title searches for the Old Mill Road Interchange (PI No. 0018361) and Frontage Road (PI No. 0018363) projects have not yet been prepared.

- *“Would any of these projects require property displacements?”*

No property displacements are anticipated at this time for the US 278 Widening project (PI No. 0017219) or Frontage Road (PI No. 0018363) projects. Property impacts have not yet been developed for the Old Mill Road Interchange project (PI No. 0018361), so this information is not available at this time.

- *“Would any land needed for these transportation projects be purchased from private landowners or acquired through eminent domain?”*

All three projects are anticipated to require right-of-way acquisition involving property purchased from private landowners. Georgia DOT always desires to acquire right-of-way by amicable settlements; however, Georgia DOT does have statutory authority to acquire property by eminent domain.

- *“Concerns about potential impacts to individual property.”*

Property impacts have not yet been developed for the Old Mill Road Interchange (PI No. 0018361) project. No displacements are anticipated at this time for the US 278 Widening (PI No. 0017219) or the Frontage Road (PI No. 0018363) projects. In the event your property is required in total or in part, a certified appraiser from Georgia DOT’s appraiser prequalification list will make a fair market value appraisal 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 Georgia DOT representative will assist you during your relocation. You will have sixty (60) days to relocate from the date title passes to Georgia DOT.

### **Comments Relating to the Public Involvement Process:**

- *“Commenters thought the public outreach was beneficial.”*

Thank you for your comment. Georgia DOT appreciates your feedback on the public involvement efforts for these projects.

- *“Some of the positive comments sound like they were planted by the JDA & GA Department of Economic Development.”*

During the public involvement process for Georgia DOT projects, the PIOHs and comment period is open to any member of the public. Georgia DOT does not have authority over who can comment on these projects.

- *“Commenters were concerned that the website did not contain adequate data to answer the public’s questions specifically environmental reports, crime data, and budgets.”*

The purpose of the PIOH meetings was to provide the public an opportunity to comment and ask the project team (including subject matter experts) questions in a live virtual format as well as in-person. Georgia DOT provided three PIOH opportunities to engage with the project team: two live virtual meetings on June 14<sup>th</sup> and 15<sup>th</sup> 2022 and an in-person PIOH on June 14, 2022.

- *“Trouble accessing the website.”*

Georgia DOT strives to provide consistent virtual access to all public involvement materials. In the event you are unable to access the website, please contact the Georgia DOT Project Manager, Katha Ahmed at 404-631-1570 or Kahmed@dot.ga.gov, so that Georgia DOT can consider providing materials in an alternative manner or provide guidance on how to access the website.

- *“Suggestion that the in-person PIOH be redone because it was not properly communicated to the public.”*

As required by NEPA and GEPA, information was sent out by mailed postcard and public notice to inform the public about the proposed projects and the opportunity to comment. All materials shared project contact email addresses, a dedicated phone line to accept comments and questions, and direct links (via a scannable QR code and typeable link) to the projects’ website. The website was regularly updated with event dates and times and provided interested individuals with full access to the same materials presented at the in-person meeting.

In addition to following NEPA and GEPA standard outreach requirements, the project team also utilized a variety of communication tools to inform the public of the PIOH meetings and public comment period. The team provided local stakeholders information about the PIOH meetings and

comment period and offered communications materials such as social media posts and newsletter information to share with their contacts throughout the project area. Georgia DOT also distributed a press release, which was covered by several media outlets, and shared posts on the Georgia DOT District's social media channel. The in-person event date and time was also shared with attendees during the first virtual meeting.

The official comment period for the PIOH for these three projects ended on June 30, 2022. As a federally funded project for which a draft EA is being prepared under NEPA, the Old Mill Road Interchange project (PI No. 0018361) will also have a PHOH, which is currently scheduled for Q2 of 2023.

- *“Concern that the virtual component of the PI is not inclusive because internet access is not widespread in the area.”*

The Georgia DOT Office of Environmental Services (OES) analyzed census data from the US Census Bureau as well as the knowledge of the Georgia DOT District personnel in the area to assess the accessibility for virtual participation. Their analysis showed no barriers, such as limited internet access, that would prevent individuals from participating in a virtual meeting.

Their findings, along with the participation and success of past virtual meetings, led to the decision to offer two virtual meetings. An in-person meeting was also held during the same time period.

- *“Commenters thought the Live Q&A of the public involvement was difficult to navigate and to provide clear questions to be answered.”*

Thank you for your feedback. Virtual PIOH offers tools for moderating discussion and ensuring that Q&A discussions are limited to project-related content. The virtual platform ensures that all questions are accurately documented and that all participants can get their questions answered.

Georgia DOT is always working to improve virtual components of public involvement to increase effective communication among the public and the Georgia DOT.

- *“Is it necessary to create a log in on the site to make comments? If so, why?”*

No, it is not required to create a log in on the website in order to comment on a proposed project. Comments can be anonymous. At the bottom of the website page, under the section titled “We Want Your Feedback”, there is a link to a survey that provides the public the ability to comment while the comment period is open.

In addition to survey/web comments during the public comment period, Georgia DOT accepts written comments at the time of the PIOHs, verbal comments left via court reporters at in-person meetings, comments sent via US mail, and voicemails/phone-logs via the project hotline. While comments for response and inclusion in the environmental document are limited to the official public comment period, general project comments directed to the Georgia DOT can be made throughout the life of a project by contacting the Georgia DOT Project Manager, Kathe Ahmed at 404-631-1570 or Kahmed@dot.ga.gov.

### **Comments Relating to Other Projects or Traffic Concerns Outside the Project Areas:**

The intent of these projects is to provide congestion relief in the area, specifically the existing I-20/US278 Interchange, due to the increase in traffic associated with several major economic developments in the immediate area that have been recently constructed or are planned for construction soon. This existing interchange is not anticipated to have enough capacity to accommodate project traffic volumes by the design year of 2045.

Several comments were received about traffic concerns outside the project limits of PI Nos. 0017219, 0018363, and 0018361, or about specific locations or projects outside the scope of PI Nos. 0017219, 0018363, and 0018361. These comments are provided below. The locations specified in these comments are not proposed for modification as part of PI Nos. 0017219, 0018363, and 0018361.

Please visit the Georgia DOT website that provides instructions for how to participate with the Quick Response process. It reads: "The Quick Response Project Program allows Georgia DOT to quickly identify, approve, and construct small traffic operations safety projects on the state route system. If you have a suggestion for a quick fix project, please share your thoughts in the form below." The page can be accessed through the Georgia DOT website at this link: <http://www.dot.ga.gov/BS/Projects/ProjectSuggestion>. Additionally, for questions concerning future Georgia DOT District 1 projects in Walton County, please contact the Georgia DOT District 1 Engineer, Kelvin Mullins, at (770) 532-5500, or the Georgia DOT District 1 Preconstruction Office at (770) 533-8490. For District 2 projects in Newton and Morgan Counties, please contact the Georgia DOT District 2 Engineer, Corbett Reynolds, at (478) 552-4600, or the Georgia DOT District 2 Preconstruction Office at (478) 553-3405.

Specific comments include:

- *"Commenters suggest that a signal be placed at the HWY 11/HWY 278 intersection rather than a roundabout due to heavy traffic and the large number of large trucks that use that intersection. There is concern that larger trucks cannot use a small roundabout."*
- *"Commenters suggest at least a flashing yellow light at the intersection of HWY 11 and Adams Circle due to poor visibility and high speeds of vehicle and trucks traveling down Highway 11."*
- *"Would the intersection of US 278 and Old Mill Road include a traffic light? Rather than put a light at the intersection could a roundabout be incorporated into the design that could handle large truck traffic?"*
- *"What are the future plans for the intersection of Old Mill Road and Newborn Road?"*
- *"East Newton Area is developing fast please look at these areas for improvements."*

### **Comments Relating Specifically to the Rivian Development:**

The three Georgia DOT projects (PI Nos. 0017219, 0018363, and 0018361) are separate endeavors from the new development in the area. They are intended to improve surrounding infrastructure for all users, including the local community. Any questions about the Rivian project

should be directed to the Georgia Department of Economic Development and Rivian at [rivian@georgia.org](mailto:rivian@georgia.org).

Again, thank you for your comments. Should you have further questions, comments or concerns, please call the project manager, Kathe Ahmed, at 404-631-1570 or the environmental analyst, Elliott Robertson, at 404-631-1190.

Sincerely,



Eric Duff  
State Environmental Administrator

ED/JK/LS/ESR

cc: Jamie Boswell, GDOT Board Member (District 10)  
Victor Anderson, State Representative (District 10)  
Emanuel Jones, State Senator (District 10)  
Kathe Ahmed, Georgia DOT Project Manager (via email)  
PDF for Project File