



REGIONAL REVIEW FINDING

Atlanta Regional Commission • 40 Courtland Street NE, Atlanta, Georgia 30303 • ph: 404.463.3100 • fax: 404.463.3105 • www.atlantaregional.com

DATE: Sep 2 2008

ARC REVIEW CODE: R808011

TO: CEO Vernon Jones

ATTN TO: Karmen Swan-White,

FROM: Charles Krautler, Director

NOTE: This is digital signature.
Original on file.

The Atlanta Regional Commission (ARC) has completed regional review of the following Development of Regional Impact (DRI). Below is the ARC finding. The Atlanta Regional Commission reviewed the DRI with regard to conflicts to regional plans, goals, and policies and impacts it might have on the activities, plans, goals, and policies of other local jurisdictions and state, federal, and other agencies. The finding does not address whether the DRI is or is not in the best interest of the local government.

Submitting Local Government: DeKalb County

Name of Proposal: Emory Healthcare Druid Hills Expansion

Review Type: Development of Regional Impact

Date Opened: Aug 1 2008

Date Closed: Sep 2 2008

FINDING: After reviewing the information submitted for the review, and the comments received from affected agencies, the Atlanta Regional Commission finding is that the DRI is in the best interest of the Region, and therefore, of the State.

Additional Comments: The proposed development meets many of ARC's Regional Development Policies, as well as the Atlanta Region Unified Growth Policy Map (UGPM). The proposed development is located within a Regional Center, according to the Atlanta Region UGPM. Regional Centers are defined as areas of intense retail, office, and residential uses. The uses can be integrated or separate. They have a higher density of residential uses but lower job densities than a Central City.

The proposed development is adjacent to the Druid Hills Historic District. ARC has received concerns from the neighborhood regarding the visual and traffic impacts from the proposed development. ARC requests that the applicant works with the neighborhood to alleviate those concerns.

Based on the traffic analysis completed by Kimley-Horn and Associates, Inc. and projected traffic volumes derived from the ARC Travel Demand Model (TDM), the transportation system is not fully capable of accommodating the new trips generated by the proposed development and maintaining acceptable LOS standards at the studied intersections. ARC concludes that improvements are needed and should be implemented to maintain or improve LOS standards on surface streets in the vicinity of the proposed development. These improvements should be contextual to the historical character of the Druid Hills Historical Area.

However, the Transportation Demand Management Strategies used by Emory University and the Clifton Corridor Transportation Management Association provide unique trip reduction methods that are atypical for a major employer in the Atlanta region. The majority of staff parking will be located at the parking garage located off of Clairmont Road connected to the main campus with an exclusive ½ mile shuttle route. The parking on the main campus is primarily reserved for visitor and patient parking. This unique arrangement allows for less demand for parking within the Main Campus than a traditional development. ARC strongly encourages Emory University and the Clifton Corridor Transportation Management Association to further enact creative trip reduction methods to lessen the impact of the new trip generations from the proposed expansion. These should include efforts to lessen the jobs-housing imbalance within this Regional Center to provide housing at all price points.

THE FOLLOWING LOCAL GOVERNMENTS AND AGENCIES RECEIVED NOTICE OF THIS REVIEW:

ARC LAND USE PLANNING
ARC DATA RESEARCH
GEORGIA DEPARTMENT OF NATURAL RESOURCES
DEKALB COUNTY
CITY OF DECATUR

ARC TRANSPORTATION PLANNING
ARC AGING DIVISION
GEORGIA DEPARTMENT OF TRANSPORTATION
DEKALB COUNTY SCHOOLS
METRO ATLANTA RAPID TRANSIT AUTHORITY

ARC ENVIRONMENTAL PLANNING
GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS
GEORGIA REGIONAL TRANSPORTATION AUTHORITY
CITY OF ATLANTA

If you have any questions regarding this review, Please call Haley Fleming, Review Coordinator, at (404) 463-3311. This finding will be published to the ARC website.

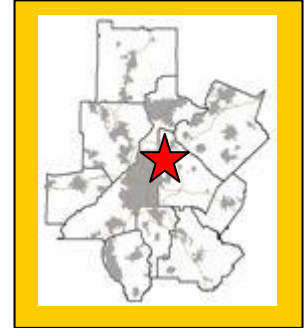
The ARC review website is located at: <http://www.atlantaregional.com/landuse>.

Preliminary Report:	August 1, 2008	DEVELOPMENT OF REGIONAL IMPACT <u>REVIEW REPORT</u>	Project:	Emory Healthcare Druid Hills Expansion #1786
Final Report Due:	August 30, 2008		Comments Due By:	August 15, 2008

FINAL REPORT SUMMARY

PROPOSED DEVELOPMENT:

The proposed Emory Healthcare Druid Hills Campus Expansion is a medical office and hospital expansion that is located on 19.34 acres in DeKalb County. The proposed expansion will consist of 395,000 square feet of clinic space and 525,000 square feet (250 bed) of hospital. The proposed expansion includes 900 parking spaces under the proposed clinic and 500 parking spaces under the proposed hospital. In addition the planned expansion includes the addition of 1,200 parking spaces to the existing parking deck at the Clairmont Campus of Emory University to serve the expansion. The expansion includes two separate areas that are considered within the limits of the project. The Hospital and clinic expansion (Main Campus) is located along Clifton Road, north of North Decatur Road, adjacent to the Emory University academic center. The parking deck expansion is located along Clairmont Road, north of North Decatur Road. The two sites are connected by a ½ mile exclusive shuttle route which travels above (grade separated) the existing CSX rail line that bisects the Emory University Campus.



PROJECT PHASING:

The project is being proposed in one phase with a project build out date for 2013.

GENERAL

According to information on the review form or comments received from potentially affected governments:

Is the proposed project consistent with the host-local government's comprehensive plan? If not, identify inconsistencies.

The project site is currently zoned O-I. The proposed zoning is O-I. Information submitted for the review states that the proposed development is consistent with the Future Development Map which designates the property as Institutional.

Is the proposed project consistent with any potentially affected local government's comprehensive plan? If not, identify inconsistencies.

No comments were received identifying inconsistencies with any potentially affected local government's comprehensive plan.

Will the proposed project impact the implementation of any local government's short-term work program? If so, how?

No comments were received identifying inconsistencies with any potentially affected local government's short term work program.

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**Will the proposed project generate population and/or employment increases in the Region?
If yes, what would be the major infrastructure and facilities improvements needed to support the increase?**

Yes, the proposed development would increase the need for services in the area for existing and future residents.

What other major development projects are planned near the proposed project?

The ARC has reviewed other major development projects, known as Area Plan (1984 to 1991) or as a DRI (1991 to present), within a mile radius of the proposed project.

Year	Name
2007	Clifton Road MUD
1985	Clairmont Place

Will the proposed project displace housing units or community facilities? If yes, identify and give number of units, facilities, etc.

Yes, the proposed development will displace vacant buildings, office space and parking decks. These are the Tower/Scarborough parking deck, the north portion of the Lowergate parking deck, the Lowergate South parking deck, and Sorority Lodge surface parking lot. The Sorority Lodge, Tufts House, and the Scarborough Clinic are also slated for demolition. In total 305,277 square feet of vacant buildings, office space and parking decks will be demolished.

Will the development cause a loss in jobs? If yes, how many?

No.

Is the proposed development consistent with regional plans and policies?

The proposed development meets many of ARC's Regional Development Policies, as well as the Atlanta Region Unified Growth Policy Map (UGPM). The proposed development is located within a Regional Center, according to the Atlanta Region UGPM. Regional Centers are defined as areas of intense retail, office, and residential uses. The uses can be integrated or separate. They have a higher density of residential uses but lower job densities than a Central City.

The proposed development is adjacent to the Druid Hills Historic District. ARC has received concerns from the neighborhood regarding the visual and traffic impacts from the proposed development. ARC requests that the applicant works with the neighborhood to alleviate those concerns.

Based on the traffic analysis completed by Kimley-Horn and Associates, Inc. and projected traffic volumes derived from the ARC Travel Demand Model (TDM), the transportation system is not fully

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capable of accommodating the new trips generated by the proposed development and maintaining acceptable LOS standards at the studied intersections. ARC concludes that improvements are needed and should be implemented to maintain or improve LOS standards on surface streets in the vicinity of the proposed development. These improvements should be contextual to the historical character of the Druid Hills Historical Area.

However, the Transportation Demand Management Strategies used by Emory University and the Clifton Corridor Transportation Management Association provide unique trip reduction methods that are atypical for a major employer in the Atlanta region. The majority of staff parking will be located at the parking garage located off of Clairmont Road connected to the main campus with an exclusive ½ mile shuttle route. The parking on the main campus is primarily reserved for visitor and patient parking. This unique arrangement allows for less demand for parking within the Main Campus than a traditional development. ARC strongly encourages Emory University and the Clifton Corridor Transportation Management Association to further enact creative trip reduction methods to lessen the impact of the new trip generations from the proposed expansion. These should include efforts to lessen the jobs-housing imbalance within this Regional Center to provide housing at all price points.

FINAL REPORT

Regional Development Plan Policies

1. Provide sustainable economic growth in all areas of the region.
2. Encourage new homes and jobs within existing developed areas of the region, focusing on principal transportation corridors, the Central Business District, activity centers, and town centers.
3. Increase opportunities for mixed use development, transit-oriented development, infill, and redevelopment.
4. At strategic regional locations, plan and retail industrial and freight land uses.
5. Design transportation infrastructure to protect the context of adjoining development and provide a sense of place appropriate for our communities.
6. Promote the reclamation of Brownfield development sites.
7. Protect the character and integrity of existing neighborhoods, while also meeting the needs of communities to grow.
8. Encourage a variety of homes styles, densities, and price ranges in locations that are accessible to jobs and services to ensure housing for individuals and families of all incomes and age groups.
9. Promote new communities that feature greenspace and neighborhood parks, pedestrian scale, support transportation options, and provide an appropriate mix of uses and housing types.
10. Promote sustainable and energy efficient development.
11. Protect environmentally-sensitive areas including wetlands, floodplains, small water supply watersheds, rivers and stream corridors.
12. Increase the amount, quality, and connectivity, and accessibility of greenspace.

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13. Provide strategies to preserve and enhance historic resources
14. Through regional infrastructure planning, limit growth in undeveloped areas of the region
15. Assist local governments to adopt growth management strategies that make more efficient use of existing infrastructure.
16. Inform and involve the public in planning at regional, local, and neighborhood levels.
17. Coordinate local policies and regulations to support Regional Policies
18. Encourage the development of state and regional growth management policy.

BEST LAND USE PRACTICES

Practice 1: Keep vehicle miles of travel (VMT) below the area average. Infill developments are the best at accomplishing this. The more remote a development the more self contained it must be to stay below the area average VMT.

Practice 2: Contribute to the area's jobs-housing balance. Strive for a job-housing balance with a three to five mile area around a development site.

Practice 3: Mix land uses at the finest grain the market will bear and include civic uses in the mix.

Practice 4: Develop in clusters and keep the clusters small. This will result in more open space preservation.

Practice 5: Place higher-density housing near commercial centers, transit lines and parks. This will enable more walking, biking and transit use.

Practice 6: Phase convenience shopping and recreational opportunities to keep pace with housing. These are valued amenities and translate into less external travel by residents if located conveniently to housing.

Practice 7: Make subdivisions into neighborhoods with well-defined centers and edges. This is traditional development.

Practice 8: Reserve school sites and donate them if necessary to attract new schools. This will result in neighborhood schools which provide a more supportive learning environment than larger ones.

Practice 9: Concentrate commercial development in compact centers or districts, rather than letting it spread out in strips.

Practice 10: Make shopping centers and business parks into all-purpose activity centers. Suburban shopping centers and their environs could be improved by mixing uses and designing them with the pedestrian amenities of downtowns.

Practice 11: Tame auto-oriented land uses, or at least separate them from pedestrian-oriented uses. Relegate "big box" stores to areas where they will do the least harm to the community fabric.

BEST TRANSPORTATION PRACTICES

Practice 1: Design the street network with multiple connections and relatively direct routes.

Practice 2: Space through-streets no more than a half mile apart, or the equivalent route density in a curvilinear network.

Practice 3: Use traffic-calming measures liberally. Use short streets, sharp curves, center islands, traffic circles, textured pavements, speed bumps and raised crosswalks.

Practice 4: Keep speeds on local streets down to 20 mph.

Practice 5: Keep speeds on arterials and collectors down to 35 mph (at least inside communities).

Practice 6: Keep all streets as narrow as possible and never more than four traffic lanes wide. Florida suggests access streets 18 feet, subcollectors 26 feet, and collectors from 28 feet to 36 feet depending on lanes and parking.

Practice 7: Align streets to give buildings energy-efficient orientations. Allow building sites to benefit from sun angles, natural shading and prevailing breezes.

Practice 8: Avoid using traffic signals wherever possible and always space them for good traffic progression.

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Practice 9: Provide networks for pedestrians and bicyclists as good as the network for motorists.
Practice 10: Provide pedestrians and bicyclists with shortcuts and alternatives to travel along high-volume streets.
Practice 11: Incorporate transit-oriented design features.
Practice 12: Establish TDM programs for local employees. Ridesharing, modified work hours, telecommuting and others.

BEST ENVIRONMENTAL PRACTICES

Practice 1: Use a systems approach to environmental planning. Shift from development orientation to basins or ecosystems planning.
Practice 2: Channel development into areas that are already disturbed.
Practice 3: Preserve patches of high-quality habitat, as large and circular as possible, feathered at the edges and connected by wildlife corridors. Stream corridors offer great potential.
Practice 4: Design around significant wetlands.
Practice 5: Establish upland buffers around all retained wetlands and natural water bodies.
Practice 6: Preserve significant uplands, too.
Practice 7: Restore and enhance ecological functions damaged by prior site activities.
Practice 8: Detain runoff with open, natural drainage systems. The more natural the system the more valuable it will be for wildlife and water quality.
Practice 9: Design man-made lakes and stormwater ponds for maximum environmental value. Recreation, stormwater management, wildlife habitat and others.
Practice 10: Use reclaimed water and integrated pest management on large landscaped areas. Integrated pest management involves controlling pests by introducing their natural enemies and cultivating disease and insect resistant grasses.
Practice 11: Use and require the use of Xeriscape™ landscaping. Xeriscaping™ is water conserving landscape methods and materials.

BEST HOUSING PRACTICES

Practice 1: Offer “life cycle” housing. Providing integrated housing for every part of the “life cycle”.
Practice 2: Achieve an average net residential density of six to seven units per acre without the appearance of crowding. Cluster housing to achieve open space.
Practice 3: Use cost-effective site development and construction practices. Small frontages and setbacks; rolled curbs or no curbs; shared driveways.
Practice 4: Design of energy-saving features. Natural shading and solar access.
Practice 5: Supply affordable single-family homes for moderate-income households.
Practice 6: Supply affordable multi-family and accessory housing for low-income households.
Practice 7: Tap government housing programs to broaden and deepen the housing/income mix.
Practice 8: Mix housing to the extent the market will bear.

LOCATION

Where is the proposed project located within the host-local government's boundaries?

The expansion includes two separate areas that are considered within the limits of the project. The Hospital and clinic expansion (Main Campus) is located along Clifton Road, north of North Decatur Road, adjacent to the Emory University academic center. The parking deck expansion is located along Clairmont Road, north of North Decatur Road. The two sites are connected by a ½ mile exclusive shuttle route which travels above (grade separated) the existing CSX rail line that bisects the Emory University Campus.

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Will the proposed project be located close to the host-local government's boundary with another local government? If yes, identify the other local government.

The proposed development is entirely within DeKalb County.

Will the proposed project be located close to land uses in other jurisdictions that would benefit, or be negatively impacted, by the project? Identify those land uses which would benefit and those which would be negatively affected and describe impacts.

None were determined during the review.

ECONOMY OF THE REGION

According to information on the review form or comments received from potentially affected governments:

What new taxes will be generated by the proposed project?

Estimated value of the development is \$1,100,000,000, however Emory University is a 501 (c) (3) tax-exempt entity, and the new healthcare facilities will be exempt from property taxes. In addition, because primarily medical and healthcare services will be provided at these facilities, the sales tax revenue will be minimal.

How many short-term jobs will the development generate in the Region?

Short-term jobs will depend upon construction schedule.

Is the regional work force sufficient to fill the demand created by the proposed project?

Yes.

In what ways could the proposed development have a positive or negative impact on existing industry or business in the Region?

The proposed development would expand and modernize healthcare facilities within the Emory Activity Center.

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NATURAL RESOURCES

Watershed Protection and Stream Buffers

Both portions of the project are located in the Peachtree Creek watershed. The USGS coverage for the area shows no streams on or near either project site. However, the plans for the Clairmont Parking Deck Expansion portion of the project shows a creek under the proposed structure, with the state 25-foot Erosion and Sedimentation Act buffer and the DeKalb 75-foot stream buffer indicated. The proposed parking deck expansion will require a variance for both of these buffers. Further, any unmapped streams that may be on the property are also subject to the DeKalb County 75-foot stream buffer ordinance and any state waters on the property are also subject to the 25-foot Erosion and Sedimentation Act buffer.

Stormwater / Water Quality

The project should adequately address the impacts of the proposed development on stormwater runoff and downstream water quality. During construction, the project should conform to the relevant state and federal erosion and sedimentation control requirements. After construction, water quality will be impacted due to polluted stormwater runoff. ARC has estimated the amount of pollutants produced after the construction of the entire proposed development, based on the submitted site plan. These estimates are based on some simplifying assumptions for typical pollutant loading factors (lbs/ac/yr). The loading factors are based on the results of regional storm water monitoring data from the Atlanta Region with impervious areas based on estimated averages for land uses in the Atlanta Region. If actual impervious percentages are higher or lower than the estimate, the pollutant loads will differ accordingly. The Main Campus portion of the project is being developed over existing impervious surfaces, which will affect the actual increases caused by the new development. The loadings for the two parcels are being calculated separately. Given the coverage of both the proposed and existing development on both parcels, commercial was chosen as the overall use for both properties. The following tables summarize the results of the analysis:

Estimated Pounds of Pollutants Per Year Main Campus Parcel (Hospital)

Land Use	Land Area (ac)	Total Phosphorus	Total Nitrogen	BOD	TSS	Zinc	Lead
Commercial	19.34	33.07	336.52	2088.72	19011.22	23.79	4.25
TOTAL	19.34	33.07	336.52	2088.72	19011.22	23.79	4.25

Total Impervious = 85%

Estimated Pounds of Pollutants Per Year Clairmont Campus Parcel (Parking Deck Expansion)

Land Use	Land Area (ac)	Total Phosphorus	Total Nitrogen	BOD	TSS	Zinc	Lead
Commercial	10.03	17.15	174.52	1083.24	9859.49	12.34	2.21



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TOTAL	10.03	17.15	174.52	1083.24	9859.49	12.34	2.21
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Total Impervious = 85%

In order to address post-construction stormwater runoff quality, the project should implement stormwater management controls (structural and/or nonstructural) as found in the Georgia Stormwater Management Manual (www.georgiastormwater.com) and meet the stormwater management quantity and quality criteria outlined in the Manual. Where possible, the project should utilize the stormwater better site design concepts included in the Manual.

HISTORIC RESOURCES

Will the proposed project be located near a national register site? If yes, identify site.

Yes, the proposed development is adjacent to the Druid Hills Historic District

In what ways could the proposed project create impacts that would damage the resource?

ARC has received comments that the proposed development would have visual and traffic impacts to the district. Further analysis of the impacts is recommended and improvements should be contextual to the historic district.

In what ways could the proposed project have a positive influence on efforts to preserve or promote the historic resource?

The applicant needs to work with the historic district to preserve and enhance its character. Visual and noise barriers should be used when appropriate in a context sensitive manner.

INFRASTRUCTURE

Transportation

How many site access points will be associated with the proposed development? What are their locations?

Main Campus

Note: The southern portion of Gambrell Drive is proposed to be renamed to Healthgate Drive and have direct access to North Decatur Road between Clifton Road and Ridgewood Drive.

Driveway #1 (full-movement) is proposed to be located approximately at the intersection of Gambrell Drive at Ridgewood Drive. Driveway #1 is proposed to serve as vehicular drop-off/valet as well as access to the Hospital's below grade parking. Circulation will most likely occur within the building's footprint.



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Emergency access to the hospital is proposed along Lowergate Drive and loading for the hospital is proposed at the existing loading area along Uppergate Drive.

Driveway #2 (full-movement) is proposed along Healthgate Drive (the re-named Gambrell Drive) approximately 350 feet east of Clifton Road. Driveway #2 is proposed to serve as vehicular drop-off/valet as well as access to the Clinic's below grade parking.

Driveway #3 (right-in/right-out) is proposed along Clifton Road between Healthgate Drive and Lowergate Drive, approximately 225 feet north of Healthgate Drive. Driveway #3 is proposed to provide direct access to the Clinic's below grade parking.

The loading and service entrance serving the clinic is proposed to be located along Healthgate Drive, approximately 450 feet east of Clifton Road.

The portion of the Lowergate Deck to remain currently consists of five access points, all expected to remain.

Clairmont Campus

The Clairmont Deck expansion is proposed to utilize the northern-most existing driveway for the current deck along Starvine Way. This driveway is located approximately 650 feet southwest of the intersection of Clairmont Road at Starvine Way. Access to this site is proposed to be maintained at the existing signalized intersection of Clairmont Road with Starvine Way.

See the referenced conceptual plan for a visual representation of access to the proposed sites

How much traffic (both average daily and peak am/pm) will be generated by the proposed project?

Kimley-Horn and Associates, Inc. performed the transportation analysis. GRTA and ARC review staff agreed with the methodology and assumptions used in the analysis. The net trip generation is based on the rates published in the 7th edition of the Institute of Transportation Engineers (ITE) Trip Generation report; they are listed in the following table:

Land Use	A.M. Peak Hour			P.M. Peak Hour			24-Hour
	Enter	Exit	2-Way	Enter	Exit	2-Way	2-Way
Hospital 250 Beds (525,000 SF)	147	63	210	108	193	301	3,588
Clinic 117 Doctors (395,000 FF)	261	181	442	181	261	442	4,420
Research and Development Center 411,734 SF	400	82	482	64	363	427	3,220
<i>Mixed-Use Reductions</i>	<i>-14</i>	<i>-8</i>	<i>-22</i>	<i>-58</i>	<i>-79</i>	<i>-137</i>	<i>-702</i>
<i>Alternative Mode Reductions</i>	<i>-120</i>	<i>-40</i>	<i>-160</i>	<i>-31</i>	<i>-104</i>	<i>-135</i>	<i>-1,345</i>



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<i>Pass-By Reductions</i>	-	-	0	-	-	0	0
Total New Trips	674	278	952	264	634	898	9,181

In addition to the trips generated by the project, some existing traffic associated with current healthcare facilities was removed from the network based upon the parking decks to be demolished. The traffic removed is associated with the existing hospital and clinic facilities that are to be converted to administrative space. These trips were removed from the roadway network based on existing traffic volumes associated with the current parking facilities on site. A majority of the decks currently serve staff, while some parking to be removed currently serve visitor parking, while other parking will be converted to alternative uses. Staff trips were determined based upon rates developed during a parking study performed in April 2007.

Removed Trips						
Parking Deck	Number of Spaces	Daily Trips (10 times PM)	AM Peak Hour		PM Peak Hour	
			Enter	Exit	Enter	Exit
STAFF						
Tower and Scarborough	616	-1,198	-116	-40	-25	-95
Lowergate South	665	-1,293	-125	-43	-27	-103
Sorority Parking Lot	41	-80	-8	-3	-2	-6
VISITORS						
Lowergate Visitor Parking	1,097	-1,396	-152	-32	-23	-125
TOTAL TO BE REMOVED		-3,966	-401	-117	-76	-329
Lowergate Parking (Converted to Staff)	677	+1,316	+127	+44	+27	+104
TOTAL TO BE CONVERTED		+1,316	+127	+44	+27	+104
TOTAL TRIPS (=CONVERTED - REMOVED)		-2,650	-273	-74	-49	-229

Net new trips generated by the proposed expansion were calculated by removing existing traffic associated with uses to be removed/converted from the adjusted gross trips anticipated to be generated. A summary of the net new trips anticipated to result from the project is provided below.

Net New Trips			
Land Use	Daily Traffic	AM Peak Hour	PM Peak Hour

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		Enter	Exit	Enter	Exit
Build-Out (Year 2013)					
Adjusted Gross Trips	9,180	674	278	264	634
Removed Trips	-2,650	-273	-74	-49	-229
Net New Trips	6,530	401	204	215	405

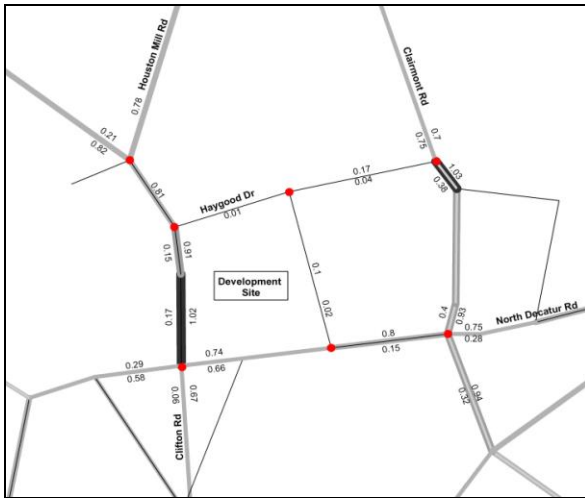
What are the existing traffic patterns and volumes on the local, county, state and interstate roads that serve the site?

Incorporating the trip generation results, the transportation consultant distributed the traffic on the current roadway network. An assessment of the existing Level of Service (LOS) and projected LOS based on the trip distribution findings helps to determine the study network. The results of this exercise determined the study network, which has been approved by ARC and GRTA. If analysis of an intersection or roadway results in a substandard LOS "D", then the consultant recommends improvements.

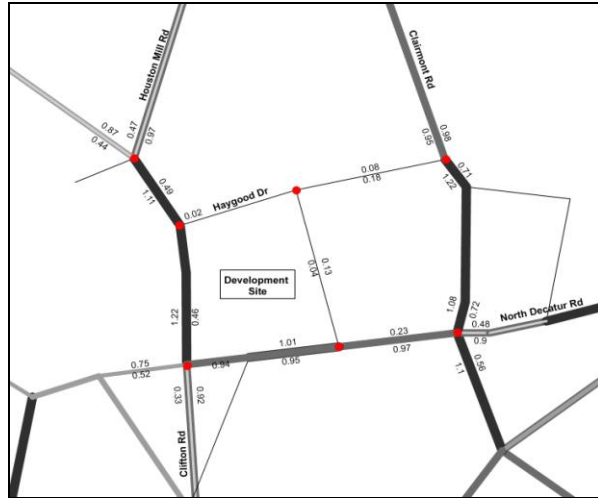
Projected traffic volumes from the Regional Travel Demand Model are compared to the assigned capacity of facilities within the study network. This data is used to calculate a volume to capacity (V/C) ratio. The V/C ratio values that define the LOS thresholds vary depending on factors such as the type of terrain traversed and the percent of the road where passing is prohibited. LOS A is free-flow traffic from 0 to 0.3, LOS B is decreased free-flow from 0.31 to 0.5, LOS C is limited mobility from 0.51 to 0.75, LOS D is restricted mobility from 0.76 to 0.9, LOS E is at or near capacity from 0.91 to 1.00, and LOS F is breakdown flow with a V/C ratio of 1.01 or above. As a V/C ratio reaches 0.8, congestion increases. The V/C ratios for traffic in various network years are presented in the following table. Any facilities that have a V/C ratio of 1.0 or above are considered congested.

V/C Ratios

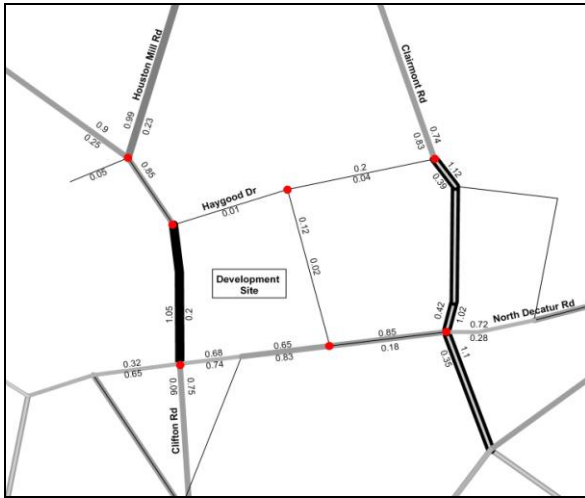
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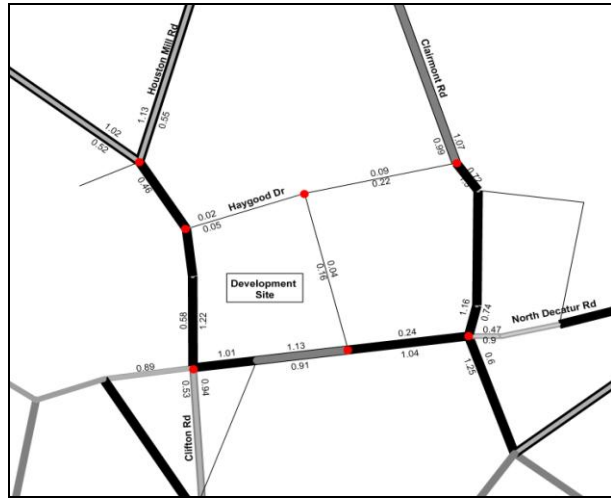
2010 AM Peak



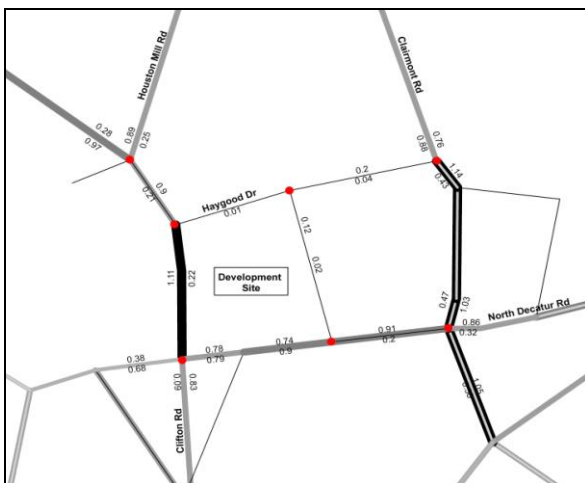
2010 PM Peak



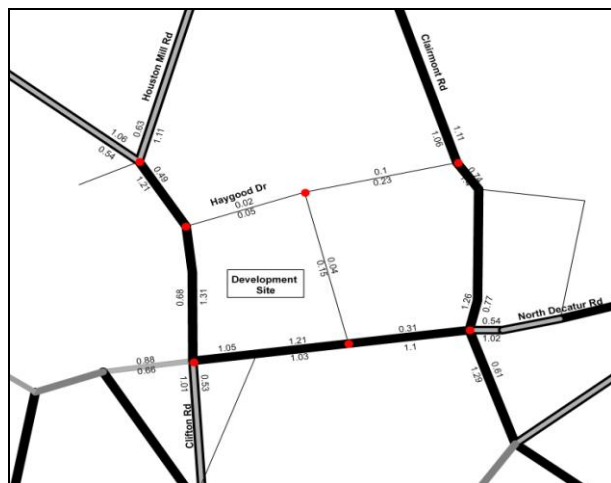
2020 AM Peak



2020 PM Peak



2030 AM Peak



2030 PM Peak

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Briarcliff Road at North Decatur Road

- Provide a second northbound through lane and a second southbound through lane along Briarcliff Road²

Clairmont Road @ North Druid Hills Road

- Provide a third eastbound and third westbound lane along North Druid Hills Road¹
- Provide a westbound right-turn lane along North Druid Hills Road¹
- Provide an additional southbound left-turn lane, creating dual left-turn lanes along Clairmont Road¹

Clairmont Road @ Mason Mill Road

- Optimize signal timings

North Decatur Road @ Clairmont Road

- Optimize signal timings

North Decatur Road @ Scott Boulevard³

- Provide a northbound right-turn lane along Scott Boulevard¹
- Provide an additional eastbound left-turn lane, creating dual eastbound left-turn lanes along North Decatur Road¹
- Provide an eastbound right-turn lane along North Decatur Road¹
- Provide an additional westbound left-turn lane, creating dual westbound left-turn lanes along North Decatur Road¹
- Provide a westbound right-turn lane along North Decatur Road¹
- Provide an additional southbound right-turn lane, creating dual southbound right-turn lanes along Scott Boulevard¹
- Provide a third eastbound through lane and westbound through lane along North Decatur Road¹

Haygood Drive @ Ridgewood Drive

- Install a southbound left-turn lane along Andrews Circle

2008 “Existing” Improvements Notes:

¹ Will require additional right-of-way and may have constructability limitations.

² Improvement not recommended, inconsistent with character of surrounding area.

³ Recommendations improve intersection operation, but not to level of service standard. Improvements noted are the maximum that are deemed practical. These improvements aid in vehicular movement but may have major impacts on adjacent property and pedestrian/bicyclist safety.

According to the findings, there will be some capacity deficiencies as a result of future year **total** traffic. The transportation consultant has made recommendations for improvements to be carried out in order to upgrade the existing level of service.

Briarcliff Road @ North Druid Hills Road

- Convert the southbound dedicated right-turn lane along Briarcliff Road to a shared through/right-turn lane¹

Briarcliff Road @ Lavista Road

- Provide a second northbound through lane and a second southbound through lane along Briarcliff Road^{2 3}

Briarcliff Road @ Clifton Road

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- Realign the intersection so that Clifton Road is the through movement from the north leg of Briarcliff Road. The south leg of Briarcliff Road will form a T-intersection^{2 3 6}
- Provide an additional westbound right-turn lane, creating dual westbound right-turn lanes along Clifton Road^{2 3 6}

North Decatur Road @ Clairmont Road

- Provide a southbound right-turn lane along Clairmont Road²

Scott Boulevard @ Orion Drive

- Provide an additional northbound left-turn lane, creating dual left-turn lanes along Scott Boulevard²
- Convert the southbound right-turn lane into a shared through/right-turn lane²

Clifton Road @ Houston Mill Road

- Provide an additional northbound left-turn lane, creating dual northbound left-turn lanes along Clifton Road²

Clifton Road @ Gambrell Drive

- Provide an additional westbound left-turn lane, creating dual left-turn lanes along Gambrell Drive⁷

Clifton Road @ North Decatur Road

- Provide a westbound right-turn lane along North Decatur Road

2013 “No-Build” Improvements Notes:

¹ Consistent with *North Druid Hills at Briarcliff Report*, dated 2006.

² Will require additional right-of-way and may have constructability limitations.

³ Consistent with *Briarcliff Road Corridor Study*, dated 2006.

⁴ Improvement not recommended, inconsistent with character of surrounding area.

⁵ Recommendations improve intersection operation, but not to level of service standard. Improvements noted are the maximum that are deemed practical. These improvements aid in vehicular movement but may have major impacts on adjacent property and pedestrian/bicyclist safety.

⁶ Intersection reconfiguration currently in design by DeKalb County.

⁷ Improvement not recommended, not needed in the projected 2013 “Build” Conditions due to proposed Healthgate Drive connection to North Decatur Road.

Is the site served by transit? If so, describe type and level of service and how it will enhance or be enhanced by the presence of transit? Are there plans to provide or expand transit service in the vicinity of the proposed project?

Currently, four MARTA bus routes (6, 19, 36, and 245) provide convenient service on roadways nearby the sites. Route 6 connects the site to the Lindbergh MARTA rail station to the north and to the Inman Park/Reynoldstown MARTA rail station to the south. Route 19 serves Clairmont Road and connects the site to the Brookhaven MARTA rail station to the north and the Decatur MARTA rail station to the south. Route 36 connects the site to the Arts Center MARTA rail station to the west and the Avondale MARTA rail station to the southeast. Route 245 Express stops on the “Clifton Connection” during its rush hour route and connects the site to the Kensington MARTA rail station to the southeast and to the Lindbergh MARTA rail station to the northwest. During weekday peak hours, Route 6 operates on scheduled approximate 30-minute headways; Route 19 operates on scheduled

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approximate 50-minute headways; Route 36 operates on scheduled approximate 40-minute headways; and Route 245 operates on scheduled approximate 20-minute headways.

Emory's campus shuttle program, the Cliff, provides several stops to service areas throughout the campus and connects the campus with other transit sites. Emory also offers three Park-n-Ride lots, located at North DeKalb, Northlake, and South DeKalb malls.

Other commute options available in the area include carpool and vanpool programs. Emory, working with the CCTMA, organizes dozens of carpools and vanpools for employees who work in the Clifton Road area, such as the Veterans Administration Hospital, Emory, and the Centers for Disease Control and Prevention.

What transportation demand management strategies does the developer propose (carpool, flex-time, transit subsidy, etc.)?

The project is located within the Clifton Corridor Transportation Management Association (CCTMA). The Clifton Corridor TMA focuses on addressing transportation concerns, improving accessibility and mobility, share services, improving air quality, and promoting alternative forms of transportation to mitigate traffic congestion.

Emory, working with the CCTMA, organizes dozens of carpools and vanpools for employees who work in the Clifton Road area, such as the Veterans Administration Hospital, Emory, and the Centers for Disease Control and Prevention. Zipcar is also provided at numerous locations within walking distance of healthcare operations.

The development **PASSES** the ARC's Air Quality Benchmark test.

Air Quality Impacts/Mitigation (based on ARC strategies)	Credits	Total
Where Retail/Office is dominant, FAR >.8	6%	6%
w/in 1/4 mile of Bus Stop (CCT, MARTA, Other)	3%	3%
Bike/ped networks that meet Mixed Use or Density target and connect to adjoining uses	5%	5%
Located within TMA which provides shuttle and parking restrictions	5%	5%
Total Calculated ARC Air Quality Credits (15 % reduction required)		19%

What are the conclusions of this review? Is the transportation system (existing and planned) capable of accommodating these trips?

Based on the traffic analysis completed by Kimley-Horn and Associates, Inc. and projected traffic volumes derived from the ARC Travel Demand Model (TDM), the transportation system is not fully

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capable of accommodating the new trips generated by the proposed development and maintaining acceptable LOS standards at the studied intersections.

ARC concludes that improvements are needed and should be implemented to maintain or improve LOS standards on surface streets in the vicinity of the proposed development.

INFRASTRUCTURE

Wastewater and Sewage

Wastewater is estimated at 0.17 MGD based on information submitted for the review.

Which facility will treat wastewater from the project?

R.M Clayton will provide wastewater treatment for the proposed development.

What is the current permitted capacity and average annual flow to this facility?

The capacity of R.M. Clayton Site is listed below:

PERMITTED CAPACITY MMF, MGD₁	DESIGN CAPACITY MMF, MGD	2001 MMF, MGD	2008 MMF, MGD	2008 CAPACITY AVAILABLE +/-, MGD	PLANNED EXPANSION	REMARKS
No Flow Limit	122	99	120	2	None. Plan before EPD to permit plant at design capacity consistent with draft Chattahoochee River Model.	Existing Consent Decree with the U.S. EPA and Georgia EPD require CSO and SSO improvements throughout the City of Atlanta wastewater system by 2007 and 2014, respectively

MMF: Maximum Monthly Flow. Mgd: million of gallons per day.

*₁ Source: Metropolitan North Georgia Water Planning District **SHORT-TERM WASTEWATER CAPACITY PLAN**, August 2002.*

What other major developments will be served by the plant serving this project?

ARC has reviewed a number of major developments that will be served by this plant.

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INFRASTRUCTURE

Water Supply and Treatment

How much water will the proposed project demand?

Water demand also is estimated at 0.22 MGD based on information submitted for the review.

How will the proposed project's demand for water impact the water supply or treatment facilities of the jurisdiction providing the service?

Information submitted with the review suggests that there is sufficient water supply capacity available for the proposed project.

INFRASTRUCTURE

Solid Waste

How much solid waste will be generated by the project? Where will this waste be disposed?

Information submitted with the review 7,000 tons of solid waste per year and the waste will be disposed of in DeKalb County.

Will the project create any unusual waste handling or disposal problems?

Yes, the proposed expansion will generate medical waste.

Are there any provisions for recycling this project's solid waste.

None stated.

INFRASTRUCTURE

Other facilities

According to information gained in the review process, will there be any unusual intergovernmental impacts on:

- **Levels of governmental services?**
- **Administrative facilities?**
- **Schools?**
- **Libraries or cultural facilities?**
- **Fire, police, or EMS?**

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- **Other government facilities?**
- **Other community services/resources (day care, health care, low income, non-English speaking, elderly, etc.)?**

None were determined during the review.

HOUSING

Will the proposed project create a demand for additional housing?

No.

Will the proposed project provide housing opportunities close to existing employment centers?

No.

Is there housing accessible to the project in all price ranges demanded?

The site proposed for the development is located in Census Tract 224.02. This tract had a 29 percent increase in number of housing units from 2000 to 2007 according to ARC's Population and Housing Report. The report shows that 16 percent, respectively, of the housing units are single-family, compared to 69 percent for the region; thus indicating is a variety of multi-family housing options around the development area.

Is it likely or unlikely that potential employees of the proposed project will be able to find affordable* housing?

Likely, assuming new development is approved with multiple price ranges of housing.

* Defined as 30 percent of the income of a family making 80 percent of the median income of the Region – FY 2000 median income of \$51,649 for family of 4 in Georgia.

Developments of Regional Impact

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[Tier Map](#)
[FAQ](#) [Apply](#) [View Submissions](#) [Login](#)

DRI #1886

DEVELOPMENT OF REGIONAL IMPACT Initial DRI Information

This form is to be completed by the city or county government to provide basic project information that will allow the RDC to determine if the project appears to meet or exceed applicable DRI thresholds. Refer to both the [Rules for the DRI Process](#) and the [DRI Tiers and Thresholds](#) for more information.

Local Government Information

Submitting Local Government: DeKalb

Individual completing form: Karmen Swan-White

Telephone: 404.371.2155

E-mail: kswwhite@co.dekalb.ga.us

*Note: The local government representative completing this form is responsible for the accuracy of the information contained herein. If a project is to be located in more than one jurisdiction and, in total, the project meets or exceeds a DRI threshold, the local government in which the largest portion of the project is to be located is responsible for initiating the DRI review process.

Proposed Project Information

Name of Proposed Project: Emory Healthcare Druid Hills Expansion

Location (Street Address, GPS Coordinates, or Legal Land Lot Description): 1365 Clifton Road Atlanta, Ga 30322

Brief Description of Project: Expansion of Emory Healthcare clinic and hospital facilities on the Druid Hills campus. Includes demolition of several facilities, new construction of a new clinic and hospital (with below grade parking), and expansion of the existing parking deck on the Emory Clairmont campus.

Development Type:

(not selected)

Hotels

Wastewater Treatment
Facilities

Office

Mixed Use

Petroleum Storage Facilities

Commercial

Airports

Water Supply Intakes/
Reservoirs

Wholesale & Distribution

Attractions & Recreational
Facilities

Intermodal Terminals

Hospitals and Health Care
Facilities

Post-Secondary Schools

Truck Stops

Housing

Waste Handling Facilities

Any other development types

Industrial

Quarries, Asphalt &
Cement Plants

If other development type, describe:

Project Size (# of units, floor area, etc.):	Net Increase of: 866,200 SF of clinic and hospital space and 858 parking spaces		
Developer:	Steve Lange - Emory University		
Mailing Address:	301 FM Drive		
Address 2:	Building C		
	City:Atlanta State: GA Zip:30322		
Telephone:	404.712.8811		
Email:	slange@emory.edu		
Is property owner different from developer/applicant?	(not selected) Yes No		
If yes, property owner:			
Is the proposed project entirely located within your local government's jurisdiction?	(not selected) Yes No		
If no, in what additional jurisdictions is the project located?			
Is the current proposal a continuation or expansion of a previous DRI?	(not selected) Yes No		
If yes, provide the following information:	Project Name:		
	Project ID:		
The initial action being requested of the local government for this project:	Rezoning Variance Sewer Water Permit Other		
Is this project a phase or part of a larger overall project?	(not selected) Yes No		
If yes, what percent of the overall project does this project/phase represent?			
Estimated Project Completion Dates:	This project/phase: N/A Overall project: 2013		
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DRI #1886

DEVELOPMENT OF REGIONAL IMPACT Additional DRI Information

This form is to be completed by the city or county government to provide information needed by the RDC for its review of the proposed DRI. Refer to both the [Rules for the DRI Process](#) and the [DRI Tiers and Thresholds](#) for more information.

Local Government Information

Submitting Local Government:	DeKalb
Individual completing form:	Karmen Swan-White
Telephone:	404.371.2155
Email:	kswwhite@co.dekalb.ga.us

Project Information

Name of Proposed Project:	Emory Healthcare Druid Hills Expansion
DRI ID Number:	1886
Developer/Applicant:	Steve Lange - Emory University
Telephone:	404.712.8811
Email(s):	slange@emory.edu

Additional Information Requested

Has the RDC identified any additional information required in order to proceed with the official regional review process? (If no, proceed to Economic Impacts.)	(not selected) Yes No
If yes, has that additional information been provided to your RDC and, if applicable, GRTA?	(not selected) Yes No

If no, the official review process can not start until this additional information is provided.

Economic Development

Estimated Value at Build-Out:	\$1.1 Billion
Estimated annual local tax revenues (i.e., property tax, sales tax) likely to be generated by the proposed development:	N/A (Emory University is a 501 (c) (3) tax-exempt entity, and the new healthcare facilities will be exempt from property taxes. In addition, because primarily medical and healthcare services will be provided at these facilities, the sales tax revenue
Is the regional work force sufficient to fill the demand created by the proposed project?	(not selected) Yes No
Will this development displace any existing uses?	(not selected) Yes No

If yes, please describe (including number of units, square feet, etc): Parking to be relocated and several ancillary buildings.

Water Supply

Name of water supply provider for this site: DeKalb County

What is the estimated water supply demand to be generated by the project, measured in Millions of Gallons Per Day (MGD)? 0.22 MGD

Is sufficient water supply capacity available to serve the proposed project? (not selected) Yes No

If no, describe any plans to expand the existing water supply capacity:

Is a water line extension required to serve this project? (not selected) Yes No

If yes, how much additional line (in miles) will be required?

Wastewater Disposal

Name of wastewater treatment provider for this site: DeKalb County

What is the estimated sewage flow to be generated by the project, measured in Millions of Gallons Per Day (MGD)? 0.17 MGD

Is sufficient wastewater treatment capacity available to serve this proposed project? (not selected) Yes No

If no, describe any plans to expand existing wastewater treatment capacity:

Is a sewer line extension required to serve this project? (not selected) Yes No

If yes, how much additional line (in miles) will be required?

Land Transportation

How much traffic volume is expected to be generated by the proposed development, in peak hour vehicle trips per day? (If only an alternative measure of volume is available, please provide.) 952 AM Peak Hour Trips, 938 PM Peak Hour Trips

Has a traffic study been performed to determine whether or not transportation or access improvements will be needed to serve this project? (not selected) Yes No

Are transportation improvements needed to serve this project? (not selected) Yes No

If yes, please describe below: Please refer to traffic study performed by Kimley-Horn and Associates.

Solid Waste Disposal

How much solid waste is the project expected to generate annually (in tons)?	7,000 tons/year		
Is sufficient landfill capacity available to serve this proposed project?	(not selected)	Yes	No
If no, describe any plans to expand existing landfill capacity:			
Will any hazardous waste be generated by the development?	(not selected)	Yes	No
If yes, please explain: Medical waste material will be generated by the proposed project.			
Stormwater Management			
What percentage of the site is projected to be impervious surface once the proposed development has been constructed?	80%		
Describe any measures proposed (such as buffers, detention or retention ponds, pervious parking areas) to mitigate the project's impacts on stormwater management: The project will include detention to mitigate storm water impacts and water quality BMP's.			
Environmental Quality			
Is the development located within, or likely to affect any of the following:			
1. Water supply watersheds?	(not selected)	Yes	No
2. Significant groundwater recharge areas?	(not selected)	Yes	No
3. Wetlands?	(not selected)	Yes	No
4. Protected mountains?	(not selected)	Yes	No
5. Protected river corridors?	(not selected)	Yes	No
6. Floodplains?	(not selected)	Yes	No
7. Historic resources?	(not selected)	Yes	No
8. Other environmentally sensitive resources?	(not selected)	Yes	No
If you answered yes to any question above, describe how the identified resource(s) may be affected: The proposed Clairmont Campus Parking Expansion will encroach on Waters of the State. A buffer variance for both county and state will be required. The stream will be piped to permit the expansion of the deck.			
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**Emory Healthcare Questions and Issues: Comments on the Development of
Regional Impact (DRI) Study**
**Prepared by the
Land Use Committee of the
Druid Hills Civic Association, Inc.
September 1, 2008**

The Big Picture:

This is a huge undertaking. It is very uncommon for Universities with Medical Schools and teaching hospitals to build their medical campuses in residential areas. University related medical facilities are typically located in a downtown of a midtown area. In this case, Emory has major facilities in both Downtown Atlanta and in the residential suburb of Druid Hills. The downtown Atlanta facility (Crawford Long) has excellent access to the Interstate highway system, and to the MARTA train system as well as the MARTA bus system. There is no conflict between the hospital and residential land uses. In contrast, the Druid Hills Facility (Emory Hospital and Clinic), lies in the midst of a residential area and an Historic District. It has no access to MARTA rail or to the Interstate highway system. The two major access routes, Briarcliff Rd and North Decatur Road are currently operating at or above capacity.

The additions to Crawford Long are significant, but are not commonly known and cannot be evaluated as part of this analysis. The Druid Hills proposal includes:

- * A new 14-story (208 ft tall), 525,000 square foot hospital with 250 beds (100 beds will replace beds currently in the current hospital, for a net gain of 150 beds on Clifton Road). 500 underground parking spaces will be built beneath the hospital.
- * A new 9-story (174 ft tall), 395,000 square foot Emory Clinic to be built next to the current Clinic. 900 parking spaces will be beneath the Clinic.
- * A new emergency department in the new hospital to replace the current facility in EUH.
- * A new 100,000 square foot research facility located on Haygood Drive across from Emory Children's Center. and adjoining the Druid Hills High School.
- * An additional 5 level, 1200 space parking deck will be built adjacent to the existing Parking deck on the Clairmont campus.
- * The demolition of portions of the existing hospital, clinic and parking deck space.

This is the third DRI that Emory has recently proposed. The Pediatric Center has recently been completed, and the Clifton Mixed Use Center (approx 900 residential units, 100,000sf, and a major addition to the Emory Conference Center is under construction. Other nearby construction includes the Emory Graduate Student Housing (271 units), a new Bookstore/admissions building, several new dormitories and several new academic buildings. Children's Healthcare of Atlanta and the CDC are also building additional facilities.

The decision making process regarding the mix of new construction between the Druid Hills and Downtown locations was not open to outsiders and is not addressed in the SLUP applications or in the DRI. Yet these decisions determine the impact of the proposals. Public statements have indicated that there will be some increased use occasioned by the new construction, but this will be partially offset by proposed demolition of parts of the existing hospital, clinics and parking decks. However, it is not clear what this net impact will be.

Questions:

General:

- Is there a DRI for the Crawford Long expansion? If so, what does it say? How does the Crawford Long development impact the Druid Hills Development, and could more hospital and clinic space be shifted to the downtown site?

Hospital:

- What are numbers and locations of existing beds now and proposed (Wesley Woods, Emory Hospital, and Crawford Long)? What assurances will be given that the existing bed space slated for demolition will occur (and when)?
- What is the traffic/noise impact of new hospital?
- What are the number and locations of Helicopters, ambulances?

Clinic:

- What is Sq ft of existing vs proposed clinic?
- What are the numbers of staff, physicians, patients and visitors to the existing vs proposed clinic?
- Confirm that the Clinic operating hours will be limited to 7:00am-7:00pm, and will not operate 24 hours, 7 days/week, as is stated in the SLUP application.
- Can the Clinic floor-ceiling heights be lessened in order to shorten the building, which is 100 feet taller than anything in the immediate area (174' vs approx 70' existing)

Site Plan

- SLUP is being used to go up rather than out. What happens to the land "saved"?

Traffic:

- What are the traffic projections for each of the proposed access points?
- Will each of the access points be open to two way traffic and to the public?
- What offsite improvements are required and how will they be constructed?
- Must offsite improvements be funded in order to approve project? What if off-site improvements are not feasible?
- What documentation supports the assumption that there will be a 20% trip reduction under the new plan?

Historic District

- Evaluate the visual, noise, light and traffic impact on Druid Hills Historic District (DHHD). (Note: ARC draft report states that no nearby historic resources have been identified! This is erroneous and must be corrected, since the DHHD virtually wraps around the Emory Campus). The Traffic study describes a recommendation for additional Southbound and Northbound traffic lanes on Briarcliff at North Decatur, within the Historic District. It also proposes widening N Decatur at the University Inn, also within the Historic District. The proposed project will expose the southern end of the Lowergate parking deck and its lighting standards to the Historic District. Any rooftop chillers would also have a negative impact on the Historic District,

Proposed conditions and requests:

Traffic:

- 1- Plan a new reliever route between Clifton and Clairmont.
- 2- No widening of North Decatur Road on the neighborhood side. Any new pavement or Right of way needed will come from the Emory side, and from Emory property.
- 3- Extend proposed sidewalk improvements and bike path Westward from Haygood Drive to Clifton.Rd, where it meets the proposed Emory Village/"road Diet" improvements.
- 4- Add LT arrow to West bound N Decatur @ Southbound Clifton.
5. Include the Haygood relocation in the site plan for the SLUP.
- 6- If the DRI improvements cannot, or should not be made, scale the project back accordingly, unless other traffic mitigation measures with equivalent improvement are installed.

Buildings and site plan:

- 1- Condition the SLUP to a site plan. Otherwise, height variance could be used anywhere onsite. Limit height to the lower of the requested stories or the requested height. Include the re-located Haygood Dr in the site plan, as it is a major access route from both N Decatur and Clifton Roads.
- 2- No chillers or other noise making equipment from atop buildings, or locations on the campus edge facing the neighborhood. Remove rooftop chillers from North Decatur Bldg.
- 3- No visibility of penthouses from a public street.
- 4- No new construction between the proposed Clinic and North Decatur Rd.
- 5- Build architectural façade on the side of the existing deck visible from public streets, and replace tall light standards with ones below the façade height.

Campus Edge:

- 1- Identify the campus edge, and update the master plan.
- 2- Where the campus edge abuts or is across the street from residential property or residential zoned property: Limit building height on the Campus edge to residential scale (2-3 stories, w a max height of 42 ft., and maximum cornice height (for sloped roofs) to 35 ft.
- 3- Set all buildings back at least 50 ft from existing or proposed right of way. If additional right of way is dedicated, setback is measured from the widened right of way.
- 4- Reinstate covenant height limits as a zoning condition on site of former Emory Baptist Church.

Streambuffer Variance

- Any streambuffer variance must be mitigated. Any mitigation must be downstream (in Clairmont Heights, not in Lullwater Estate).

-----end-----