



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: June 24 2010

ARC REVIEW CODE: R1005251

TO: Mayor Mario Avery
ATTN TO: Troy Besseche, City of Fairburn
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: City of Fairburn
Name of Proposal: Southcreek V

Review Type: Development of Regional Impact
Date Opened: May 25 2010

DRI Checklist Summary:

Regional Policies and Adopted Plans: 83%
Development Project Score: 52%
Open Space Preservation/Environmental Quality Score: 59%

Overall Score: 62.9%
Overall Weighted Score: 69%

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.

Comments: According to the Unified Growth Policy Map (UGPM), the proposed development is located in an area designated as suburban development that recommends development at a more suburban scale with appropriate commercial development and low intensity mixed use. The proposed development is also located within a freight area on the UGPM.

The proposed development is located in an area that is rapidly changing and is becoming primarily dominated by industrial and warehouse uses within Fulton County. It is important to consider compatible uses and potential land use conflicts as the area continues to develop.

The proposed project is located within the Line Creek Water Supply watershed, a small (less than 100 square mile) watershed which is a water supply source for both Coweta and Fayette counties, both of which are in the Metropolitan North Georgia Water Planning District. Under the Georgia Planning Act, all development in the watershed is subject to the DNR Part 5 Water Supply Watershed Minimum Criteria (Chapter 391-3-16-.01, Criteria for Water Supply Watersheds) unless alternative criteria are developed and adopted by the jurisdiction according to the requirements of the Part 5 criteria and approved by Georgia EPD and DCA. The minimum criteria include: a limit on impervious surface of either 25 percent of watershed area or the existing amount, whichever is greater; buffer requirements on perennial (blue-line) streams including a 75-foot buffer more than 7 miles upstream of the closest intake; and other requirements for hazardous materials and hazardous waste.

The City will need to determine if the proposal is within the 25 percent impervious coverage requirement for its portion of the basin, unless alternate criteria have been developed and approved.

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

ARC LAND USE PLANNING
ARC DATA RESEARCH
GEORGIA DEPARTMENT OF NATURAL RESOURCES
FULTON COUNTY
CITY OF TYRONE

ARC TRANSPORTATION PLANNING
ARC AGING DIVISION
GEORGIA DEPARTMENT OF TRANSPORTATION
CITY OF PALMETTO

ARC ENVIRONMENTAL PLANNING
GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS
GEORGIA REGIONAL TRANSPORTATION AUTHORITY
FAYETTE COUNTY

If you have any questions regarding this review, Please contact Jon Tuley at (404) 463-3309 or jtuley@atlantaregional.com. This finding will be published to the ARC website.

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

General Project Information			
Project name:	Southcreek V		
DRI number:	2110		
Local jurisdiction:	City of Fairburn		
Local government action requested:	Permit modification		
Project description (include acreage):	The proposed project is located on 71.938 acres in the southeast quadrant of the intersection of Oakley Industrial Blvd and Creekwood Drive, in the City of Fairburn. The proposed development consists of the construction of a 1,490,850 sf high cube warehouse/distribution facility. The development will be done in two phases as noted in the next question. Final build-out of the site will consist of the 1,490,850 sf single story high cube facility with 301 automobile parking spaces and 473 trailer staging spaces.		
Project phasing/buildout:	Phase 1 2011, Phase 2 2013		
Project location:	The southeast quadrant of the intersection of Oakley Industrial Blvd and Creekwood Drive, in the City of Fairburn.		
Current description of the site:	Western 55 acres of the site was pregraded by developer for a smaller building in 2008. Remaining portion of the site was native wooded area.		
Is any portion of the project built or under construction?	Yes		
If you answered the previous question with "Yes", please describe.	Site is currently being graded for larger building.		
Affected local governments (3 miles of project site):	Fulton County, City of Palmetto, Fayette County, City of Tyrone		
Adjacent/surrounding land uses and development:	Line Creek Nature Preserve lies to the northeast, southeast and southwest of the site which contains a 330 ft wide Georgia Power Co easement. Oakley Industrial Blvd forms the northwestern boundary of the site. Creekwood Drive forms a portion of the western boundary of the site. The site abuts one residential lot. There are other residential and industrial developments within the area		
Value at Build-Out:	\$50,000,000		
Expected annual local tax revenues:	\$112,500		
Site access roads:	Oakley Industrial Blvd & Creekwood Drive		
Number of site driveways proposed:	3		
Total traffic volume to be generated by the proposed development:	Daily: 3038; AM Peak: 161 (105/56); PM Peak: 155 (51/104)		
Estimated water supply demand to be generated by project:	704,673 gal/yr		
Sufficient water capacity available:	Yes		
Estimated sewage flow to be generated by project:	704,673 gal/yr		
Sufficient wastewater capacity available:	Yes		
Estimated solid waste generated by the project annually:	261 tons/yr		
Sufficient landfill capacity available:	Yes		
Number of students expected to be generated by the project:	N/A		
Schools expected students to attend and capacity:			
School 1:	N/A	Capacity:	N/A
School 2:	N/A	Capacity:	N/A
School 3:	N/A	Capacity:	N/A

	GRTA Criteria	ARC Score	Comments
A. Regional Plans and Policies			
1. Unified Growth Policy Map			
A. Is the development consistent with the Unified Growth Policy Map and the Developments Type Matrix? • 3 points: Yes		3	(Indicate Regional Place Type shown on Map) Suburban Neighborhood and Freight Area
B. Is the development consistent with the Regional Development Plan Policies? • 3 points: Yes		3	
2. Metro North Georgia Water Planning District (MNGWPD) Plan Compliance			
A. Is there adequate water provisions available and accessible to the site? • 3 points: Yes	N/A	3	
B. Is there adequate sewer capacity available and accessible to the site? • 3 points: Yes	N/A	3	
C. Does the development incorporate stormwater best management practices from the State of Georgia Manual? • 3 points: Yes	N/A	0	Information not submitted for the review
3. Regional Transportation Plan (RTP) Goals & Objectives			
A. Is the development located on or within half a mile of a roadway designated on the Regional Strategic Transportation System (RSTS)? • 3 points: Located on the RSTS or within 1/2 mile and all access points align with existing or planned median breaks. If no median exists or is planned, all access points align with existing opposing access points.		1	The proposed development is located adjacent to Interstate 85, but is located more than 1 mile from the nearest interchange. The proposed development is located more than 1 mile from Senoia Road which is on the RSTS.
4. RTP and Transportation Improvement Program (TIP)			
A. Are the transportation impacts identified consistent with the TIP/RTP? • 3 points: Yes		3	(List all TIP/RTP projects located within the surrounding network and identify any inconsistencies) See traffic study
5. Livable Centers Initiative (LCI)			
A. Is the development located in an LCI Study area? • 3 points: The project is located in an LCI Study Area and meets the intent of the Study.		N/A	(Including any LCI transportation projects) The proposed development is not within an LCI study area

	GRTA Criteria	ARC Score	Comments
A. Regional Plans and Policies			
6. Regionally Adopted Plans			
A. If the development is located within a transportation study area, indicate which study area.	N/A	N/A	(Provide the name of the study in which the development is located)
B. Is the development consistent with the recommendations set forth in any sub-area or multi-modal corridor study? • 3 points: Yes		N/A	
C. Is the proposed development consistent with the Atlanta Regional Freight Mobility Plan? • 3 points: Yes		3	
7. Locally Adopted Plans			
A. Is the development consistent with the host local government's Future Development Map or other comparable document? • 3 points: Yes		3	
B. Is the development consistent with the local government's transportation plans? • 3 points: Yes		N/A	
C. Is the development consistent with any local government sub area plans? • 3 points: Yes		N/A	
D. Is the development consistent with any adjacent or potentially affected local government's Future Development Map? • 3 points: Yes		3	
E. Do local regulations impact the ability of the project to meet GRTA's DRI Review Criteria?		N/A	(List any local regulations that impact the ability of the project to meet GRTA's DRI Review Criteria)
F. Is the development consistent with other regional and/or local policies/adopted plans that have not been fully addressed?		N/A	
Possible Score (Standard is 42)	N/A	30	
Components Score	N/A	25	
Percentage	N/A	83%	

	GRTA Criteria	ARC Score	Comments
B. Project			
1. Mixture of Uses			
<p>A. Does the development incorporate a mixture of complementary land uses?</p> <ul style="list-style-type: none"> • 3 points: There are 3 or more complementary uses within the development. • 2 points: There are 2 complementary uses within the development and is located within a short walking distance (less than 1/2 mile) to external complimentary land uses. • 1 points: The development is located within a short walking distance (less than 1/2 mile) to external complementary land uses. 	N/A	N/A	
<p>B. Does the development have vertically mixed uses?</p> <ul style="list-style-type: none"> • 3 points: The development contains three or more vertically mixed uses. • 2 point: The development contains two or more vertically mixed uses. 	N/A	N/A	
<p>C. The development contains or is in close proximity to active or passive greenspace?</p> <ul style="list-style-type: none"> • 3 points: The development contains both an active and passive greenspace. • 2 points: The development is adjacent to active or passive greenspace with connections. • 1 point: The development is within 1/2 mile of an active or passive greenspace. 	N/A	2	The development is adjacent to the City of Fairburn's Line Creek Nature Preserve on the northeast, southeast, and southwest sides
2. Jobs to Housing Balance			
<p>Is the development located in close proximity to a metro job center (as defined and listed in the Guidebook)?</p> <ul style="list-style-type: none"> • 3 points: Yes, the development is located within 1/2 mile of a defined metro job center. • 2 points: Yes, the development is located within 1 mile of a defined metro job center. 	N/A	0	The proposed development is located more than 1 mile from the nearest metro job center
3. Housing Diversity and Affordability			
<p>A. For developments with a residential component, are at least 10% of the residential units of differing housing type? (See guidebook for definition of housing types).</p> <ul style="list-style-type: none"> • 3 points: Yes. 	N/A	N/A	
<p>B. For developments with a residential component, does the development add a new housing type to the immediate (1/4 mile) surrounding neighborhood?</p> <ul style="list-style-type: none"> • 3 points: Yes. 	N/A	N/A	
<p>C. For developments with a multifamily rental component, does the development achieve certain affordability levels?</p> <ul style="list-style-type: none"> • 3 points: At least 30% of the residential rental units provided are affordable to those making 80% or less of the area median income. • 2 points: At least 20% of the residential rental units provided are affordable to those making 80% or less of the area median income. • 1 points: At least 10% of the residential rental units provided are affordable to those making 80% or less of the area median income. 	N/A	N/A	

	GRTA Criteria	ARC Score	Comments
B. Project			
D. For developments with a multifamily senior rental component, does the seniors component achieve certain affordability levels? <ul style="list-style-type: none"> • 3 points: 100% of the residential senior units provided are affordable to those at 60% or below of the area median income. • 2 points: 60% of the residential senior units provided are affordable to those at 60% or below of the area median income. • 1 point: 40% of the residential senior units provided are affordable to those at 60% or below of the area median income. 	N/A	N/A	
E. For developments with a homeownership component, does the development achieve certain affordability levels? <ul style="list-style-type: none"> • 3 points: At least 20% of the for-sale units are affordable to those making 110% or less of area median income. • 2 points: At least 10% of the for-sale units are affordable to those making 110% or less of area median income. • 1 point: At least 5% of the for-sale units are affordable to those making 110% or less of area median income. 	N/A	N/A	
F. For developments without a residential component, does the development add a new use that is not prevalent in the immediate (1/4 mile) surrounding neighborhood? <ul style="list-style-type: none"> • 3 points: Yes. 	N/A	N/A	The development is located in an area planned for additional industrial uses
4. Aging in Place			
F. If the development includes a senior housing component, does the development include accessibility features and location to services and transportation alternatives? <ul style="list-style-type: none"> • 3 points: Yes, the development includes accessibility measures and is located within 1/4 mile of basic services and transportation alternatives. • 2 points: Yes, the development includes accessibility measures and is located within 1/2 mile of basic services and transportation alternatives. • 1 point: Yes, the development includes accessibility measures. 	N/A	N/A	
A. For developments with multifamily senior rental component, does the development offer services and/or facilities to accommodate aging in place (see Guidebook for more details). <ul style="list-style-type: none"> • 3 points: Yes 	N/A	N/A	

	GRTA Criteria	ARC Score	Comments
B. Project			
5. Accessibility - Non-motorized			
A. Are there sidewalks within the development? • 3 points: There are sidewalks on both sides of all streets. • 2 points: There are sidewalks on both sides of all internal collector streets and one side on all other streets . • 1 point: There are sidewalks on one side of all streets.		0	
B. Are there existing or proposed sidewalks along all adjacent external street frontages that connect to the internal sidewalk network? • 3 points: Yes		0	
C. Is bicycle parking provided at all non-residential, multi-family buildings and other key destinations? • 3 points: Yes and includes 'end of trip' facilities such as covered shelters, secure parking, shower facilities, etc. • 2 points: Yes.		N/A	
D. Does the development include construction of multi-use trails? • 3 points: Trails will be constructed at least 10 feet wide within the development that will shorten walking distances between complimentary uses and/or the external sidewalk/trail network. • 2 points: Trails at least 10 feet wide are constructed within the DRI boundary only.		N/A	
E. Are intersections designed for pedestrian safety, including marked crossing, curb extensions, median refuges, raised crosswalks, and pedestrian actuation devices? • 3 points: Yes, all intersections are designed for pedestrian safety and include all of the above listed. • 2 points: Yes, all intersections are designed for pedestrian safety and include 3 of the above listed. • 1 point: Yes, all intersections are designed for pedestrian safety and include 2 of the above listed.		0	
F. Are pedestrian connections between building entrances and the internal and external sidewalk network provided? • 3 points: All building entrances are connected to the sidewalk network and pedestrian entrances are provided at street level along abutting public roads. • 2 points: All building entrances are connected to the sidewalk network.		0	There is one sidewalk in between the building and one row of parking. The applicant should investigate adding sidewalks from the building to the rest of the employee parking area and to the public street.
G. Do the provided non-motorized facilities shorten the distance between land uses that are on and off-site? • 3 points: Yes, both on and off site. • 2 points: Yes, for on site land uses only.		N/A	

	GRTA Criteria	ARC Score	Comments
B. Project			
H. Does the development contribute to public streetscapes with pedestrian-friendly amenities, such as benches, lighting, street trees, trash cans, pedestrian entrance on street level, and windows at street level? • 3 points: Yes.		N/A	
I. Is the development's parking located where it does not visually dominate the development from the street and allows for easy and safe pedestrian access to buildings? • 3 points: Parking associated with the development is located in the rear and or includes structured parking. • 2 points: Parking associated with the development is located to the side of the buildings and/or includes on-street parking. • 1 points: If industrial, all trailer parking is screened from the view of the adjacent roadways.		1	While the truck trailer parking is located to the side of the proposed building, all parking should be screened from view using a vegetative (or other) buffer.
J. Are buildings oriented to existing or proposed public roads with minimum setbacks? • 3 points: Yes, buildings are oriented to the public roads with minimum setbacks. • 2 points: Yes, buildings are oriented to the public roads.		2	
K. Where there are sidewalks, is the width adequate? • 3 points: All sidewalks meet regional Pedestrian LOS goals. • 2 points: All sidewalks meet the local government's minimum width requirement.	N/A	N/A	(PLOS B or above in LCI areas and regional places, PLOS C or above outside of those areas)
6. Accessibility - Transit			
A. Is there a fixed guideway transit station available ? • 3 points: Currently available within 1/4 mile of the DRI boundary. • 2 points: Currently available within 1/2 mile of the DRI boundary. • 1 point: There is a transit station planned near the DRI and the DRI is compatible with that plan.		N/A	
B. Is local bus service currently available? • 3 points: Available on/adjacent to the site. • 2 points: Available within 1/4 mile of the DRI boundary. • 1 point: Available within 1/2 mile of the DRI boundary.		N/A	
C. Is the applicant providing transit services such as dedicated park and ride facility or shuttle service (for at least 2 years)? • 3 points: Yes, the development is providing facilities.		N/A	
D. Is the applicant providing amenities at existing or proposed transit facilities, such as covered bus shelters, trash receptacles, benches, landing pads, lighting, or bicycle parking? • 3 points: Providing three or more amenities. • 2 points: Providing two or more amenities. • 1 point: Providing one amenity		N/A	

	GRTA Criteria	ARC Score	Comments
B. Project			
E. Is the development proposed at "transit ready" densities, based on potential future service? • 3 points: Yes		N/A	
F. For developments earning at least 1 point under Affordability Levels, is the development located in proximity to transit? • 3 points: Yes, the development is located within 1/4 mile to transit. • 2 points: Yes, the development is located within 1/2 mile to transit. • 1 point: Yes, the development is located within 1 mile to transit.	N/A	N/A	
G. Is transit available beyond peak-hours of travel?		N/A	
H. Is the proposed development consistent with other transit related issues not fully addressed above?		N/A	(List of other transit related issues and describe developments consistency)
7. Access Management			
A. Is access provided from internal roadways, access road, or shared driveways only? • 3 points: Access is provided from internal roadways or access road connecting to side streets with minimum curb cuts along the arterial road and share driveways are proposed. • 2 points: Shared driveways are proposed with an internal roadway.		N/A	
B. If the development is adjacent to more than one roadway, is access provided via the lowest functionally classified roadway? • 3 points: The development proposes all access via the lowest functionally classified roadway. • 2 points: The development proposes primary access from the lowest functionally classified roadway.		N/A	
C. Do access points align with opposing access points or with existing median, planned, or likely location of future median breaks? • 3 points: All access points align with existing median breaks. If no median exists, all access points align with existing opposing access points. • 2 points: All full access points align with existing median breaks. If no median breaks exists, all full access points align with existing opposing access points. • 1 point: Access points align with likely locations of future median breaks.		N/A	
D. Are proposed traffic signals located at the intersection of public roadways that provide access to the entire site and serve as many properties and interests as possible? • 3 points: Yes.		N/A	Traffic light may not be warranted at this intersection
E. Does the proposed development provide an adequate, uninterrupted driveway throat length for the corridor? • 3 points: Yes.		3	(Minimum 200 feet on state routes and major arterials. Minimum of 100 feet on all other roadway corridors.)
F. Are all proposed access points outside of the functional area of any adjacent intersections? • 3 points: All proposed access points are outside of the functional area of any adjacent intersections. • 2 points: Access points within the functional area of any adjacent intersections are right in/right out.	N/A	3	

	GRTA Criteria	ARC Score	Comments
B. Project			
G. If the development is adjacent to a designated scenic byway, the development maintains the natural vegetative character of the scenic byway. • 3 points: The development is not proposing any access onto the scenic byway and is preserving the natural vegetation for at least 200 feet from the right-of-way. • 2 points: The development is proposing no more than one access point onto the scenic byway and is preserving the natural vegetation for at least 200 feet from the right-of-way. • 1 point: The development is proposing no more than one access point onto the scenic byway and is preserving the natural vegetation for at least 100 feet from the right-of-way.	N/A	N/A	
H. Do the proposed access points meet minimum spacing requirements established by GDOT or other permitting agency?		N/A	
I. Is the development consistent with other access management related issues not fully addressed above?		N/A	(List of other access management related issues and describe developments consistency)
8. Connectivity			
A. Does the development provide multiple ingress/egress points and have access to multiple roadways? • 3 points: There are separate ingress/egress points in 3 or more cardinal directions. • 2 points: There are separate ingress/egress points in 2 cardinal directions. • 1 point: There are separate ingress/egress points.		2	
B. Do internal streets within the development connect to adjacent parcels at stub outs or dead end streets? • 3 points: There are connections to all adjacent stub outs or dead ends. • 2 points: There are stub outs to adjacent developable land (either undeveloped or underdeveloped) and cross access easements are provided. • 1 point: There are stub outs to adjacent developable land (either undeveloped or underdeveloped).		N/A	
C. Does the internal street network minimize traveling distance by providing relatively direct circulation throughout the site? • 3 points: All proposed land uses within the development are connected via the internal street network. • 2 points: Most of the proposed land uses within the development are connected via the internal street network.		N/A	
D. Can the internal street network be reasonably anticipated to add to the public roadway? • 3 points: No restricted access • 2 points: Internal restricted access with multiple access points		N/A	
E. Is the development consistent with other connectivity related issues not fully addressed above? • 3 points: Yes		N/A	(List of other connectivity related issues and describe developments consistency)

	GRTA Criteria	ARC Score	Comments
B. Project			
9. Project Character and Design			
<p>A. Is the development a redevelopment site?</p> <ul style="list-style-type: none"> • 3 points: The development is a redevelopment site that requires environmental remediation. • 2 points: The development is located in a tax abatement zone, enterprise zone, or other governmentally supported redevelopment zones. • 1 point: The development is a redevelopment site. 	N/A	N/A	
<p>B. Does the development re-use or rehabilitates existing and/or historic structures?</p> <ul style="list-style-type: none"> • 3 points: Yes, a majority of the existing and/or historic structures will remain on the site and incorporated into the development. • 2 points: Yes, some of the existing and/or historic structures will remain on the site and incorporated into the development. 	N/A	N/A	
<p>C. Does the development create or enhance community spaces such as public plazas, squares, parks, etc?</p> <ul style="list-style-type: none"> • 3 points: Yes and on-site community spaces are open to the general public. • 2 points: Yes. 	N/A	N/A	
<p>D. Does the development provide no more parking than the minimum required by the local jurisdiction?</p> <ul style="list-style-type: none"> • 3 points: A parking variance is being requested to provide less than the minimum required. • 2 points: Yes. 	N/A	3	The applicant has indicated that a variance for required parking was granted by City of Fairburn Mayor and Council during Site Plan approval, providing for less than the minimum usually required.
<p>E. Does the site design incorporate alternative design principles, including but not limited to reduced lot sizes, rear access via alleyway network, shared driveway, reduced building setbacks, architectural compatibility, screening of equipment?</p> <ul style="list-style-type: none"> • 3 points: Yes, the development includes a 4 of the above listed and other alternative design principles. • 2 points: Yes, the development includes 3 of the above listed. • 1 point: Yes, the development includes 2 of the above listed. 	N/A	N/A	

	GRTA Criteria	ARC Score	Comments
B. Project			
10. Community Facilities			
A. Does the development require new and/or additional services and/or facilities (fire, police, school)? • 3 points: No, new facilities are not needed. • 2 points: New facilities are needed and are being provided for within the development or by the applicant.	N/A	3	
11. Infrastructure Adequacy			
A. Is the development located in an area where adequate infrastructure is in place? • 3 points: Yes, the development is located in an area where there is existing infrastructure in place to meet the service needs of residents, employees, and visitors of the development. • 2 points: There will be infrastructure in place by development build-out to meet the service needs of residents, employees, and visitors of the development.	N/A	3	(Please explain)
B. If the development is predominately industrial, what is the proximity to the nearest intermodal station or other freight transfer location? • 3 points: Rail is on site and the development is connecting to the rail. • 2 points: A rail transfer, airport transfer or intermodal transfer station is located within 2 miles. • 1 point: A rail transfer, airport transfer or intermodal transfer station is located within 3 miles.	N/A	1	There is a rail transfer station approximately 3 miles from the proposed development
C. If the development is predominately industrial, what is the proximity to interstate access? • 3 points: The development has interstate access within 1 mile. • 2 points: The development has interstate access within 2 miles. • 1 points: The development has interstate access within 3 miles.	N/A	2	
D. Does the development propose clean-fueled vehicles? • 3 points: Development is proposing 5% per each 10% of fleet. • 2 points: Development is proposing 3% per each 10% of fleet. • 1 point: Development is proposing 2% per each 10% of fleet.	N/A	N/A	
E. Is the development consistent with other infrastructure related issues not fully addressed above? • 3 points: Yes		N/A	(List of other infrastructure related issues and describe developments consistency)
Possible Score	N/A	48	
Component Score	N/A	25	
Percentage	N/A	52%	

	GRTA Criteria	ARC Score	Comments
C. Open Space and Preservation/ Environmental Quality			
1. Protection of Critical Environmental Areas			
A. Does the development avoid critical historical and environmental areas (State Planning Part V Criteria, small water supply watersheds, etc)? • 3 points: Yes, the development avoids critical historical and environmental areas	N/A	3	
B. Does the development encroach upon habitat currently under or flagged for conservation under a local, regional, state conservation or green infrastructure plan? • 3 points: No.	N/A	3	
C. Is the development located on land physically suitable for development (avoids steep slopes greater than 20%, floodplains, stream corridors, groundwater recharge areas or wetlands) ? • 3 points: Yes, the development is located on land physically suitable for development. • 2 points: The development is avoiding land on the site that is not suitable for development and is taking the appropriate mitigation measures.	N/A	2	
2. Conservation			
A. How much land is being preserved as open space? • 3 points: 50% of the site is preserved as open space • 2 points: 40% of the site is preserved as open space • 1 points: 30% of the site is preserved as open space.	N/A	0	Less than 30%
B. Does/will the development incorporate native plant and drought tolerant landscaping? • 3 points: All landscaping is drought tolerant and native. • 2 points: All landscaping is drought tolerant. • 2 points: No invasive plant species are used as identified by the local Cooperative Extension Service.	N/A	0	To receive points for this question, the applicant needs to provide ARC with a letter indicating that "xeriscaping" will be used. The applicant has indicated that landscaping of the site will be "xeriscaping" and will require no irrigation.
D. Does the development exclude ornamental water features and fountains? • 3 points: The applicant will not install or facilitate installations of any ornamental water features or fountains.	N/A	3	None indicated on the site plan
E. Does the development include permeable pavement in driveways and parking areas? • 3 points: 75% of driveways and parking areas use permeable pavement. • 2 points: 50% of driveways and parking areas use permeable pavement. • 1 point: All driveways use permeable pavement.	N/A	N/A	

	GRTA Criteria	ARC Score	Comments
C. Open Space and Preservation/ Environmental Quality			
3. Stormwater Management			
A. Does the development have a stormwater management plan? • 3 points: The stormwater management plan will result in a 25% decrease in the rate and quantity of post-development development stormwater runoff when compared with pre-development stormwater rates and quantities. • 2 points: The development maintains stormwater volume rates such that post-development development does not exceed the pre-development development (based on the 2 year, 24 hour peak discharge volume)	N/A	2	The applicant has indicated that the development maintains stormwater volume rates such that post-development development does not exceed the pre-development development (based on the 2 year, 24 hour peak discharge volume). See Stormwater Management Study.
4. Buffers			
A. Will the proposed development require a stream buffer variance under any applicable ordinances? • 3 points: The development does not require a stream buffer variance.	N/A	3	
5. Environmental Protection			
C. Is the development seeking a LEED certification? • 3 points: The development is seeking LEED-ND certification or all buildings are seeking LEED certification for non residential developments. • 2 points: At least half of the non-residential buildings are seeking LEED certification. • 1 point: One non residential buildings is seeking LEED certification.	N/A	0	To receive points for this question, the applicant needs to provide ARC with a letter indicating that LEED certification will be pursued.
D. Is the development seeking an EarthCraft certification? • 3 points: The development is seeking Earthcraft Communities certification. • 2 points: At least half the residential homes will be certified an Earthcraft Home.	N/A	N/A	
Possible Score	N/A	27	
Component Score	N/A	16	
Percentage	N/A	59%	

ARC Score Sheet

Enter the values for the appropriate numbered section.

A. Regional Development Plans and Policies (50% of the Total Score)

1. Unified Growth Policy Map	Section Score:	6
2. Metro North Georgia Water Planning District (MNGWPD) Plan Compliance	Section Score:	6
3. Regional Transportation Plan (RTP) Transportation	Section Score:	1
4. RTP and Transportation Improvement Program (TIP)	Section Score:	3
5. Livable Centers Initiative (LCI)	Section Score:	0
6. Regionally Adopted Plans	Section Score:	3
7. Locally Adopted Plans	Section Score:	6
	A. Component Points:	25
	B. Points Possible Points:	30
	C. Component Percentage	83%

B. Project (30% of the Total Score)

1. Mixture of Uses	Section Score:	2
2. Jobs to Housing Balance	Section Score:	0
4. Housing Diversity and Affordability	Section Score:	0
5. Aging in Place	Section Score:	0
6. Accessibility-non motorized	Section Score:	3
7. Accessibility- transit	Section Score:	0
8. Access Management	Section Score:	6
9. Connectivity	Section Score:	2
10. Project Character and Design	Section Score:	3
11. Community Facilities	Section Score:	3
12. Infrastructure Adequacy	Section Score:	6
	A. Component Points:	25
	B. Points Possible Points:	48
	C. Component Percentage	52%

C. Open Space and Preservation/Environmental Quality (20% of the Total Score)

1. Protection of Critical Environmental Areas	Section Score:	8
2. Conservation	Section Score:	3
3. Stormwater Management	Section Score:	2
4. Buffers	Section Score:	3
5. Environmental Protection	Section Score:	0
	A. Component Points:	16
	B. Points Possible Points:	27
	C. Component Percentage	59%

A. Total Points:	66
B. Total Possible Points:	105
C. Unweighted Score	62.9%

**Overall Project
Score**

69%



MEMORANDUM

TO: Jon Tuley, Land Use Division

FROM: Lyubov Zuyeva, Transportation Planning Division

DATE: May 26, 2010

SUBJECT: **TPD Review of DRI # 2110**

Project: Southcreek V

County: South Fulton

Location: on the southeast side of Oakley Industrial Boulevard, where it turns south and becomes Creekwood Drive, on the south side of the City of Oakley

Analysis:

Expedited

☐

Non-Expedited

☒

cc: David Haynes
TPD

The Transportation Planning Division has reviewed the traffic study performed by Street Smarts on behalf of the developer of the above referenced proposed project. The following input is provided for the Infrastructure section of the DRI Report.

This DRI proposal is being considered for review under the Georgia Regional Transportation Authority Non-expedited Review Process. The proposed 71.9 acre site would house 1,490,850 SF of high cube warehouse space in one large building.

INFRASTRUCTURE

Transportation

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

Site access is proposed via three driveways off of Oakley Industrial Parkway/Creekwood Drive; of these three driveways, the southern-most driveway is meant for emergency vehicle access only.

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

Street Smarts performed the transportation analysis. Trip generation rate was calculating using the ITE rates published in Trip Generation, 8th Edition (2008), and Trip Generation Handbook (2004). A 1% background traffic growth rate was used, based on historical trends, to project background traffic to 2013. The ARC staff finds this methodology acceptable. The resulting trip generation rates projected for the build-out year of 2013 are listed in the table below.

Southcreek V Gross Trip Generation, Build-Out Year (2013)						
Land Use	Daily Traffic		AM Peak Hour		PM Peak Hour	
	Enter	Exit	Enter	Exit	Enter	Exit
1,490,850 SF High-Cube Warehousing	3,038	3,038	105	56	51	104

List the transportation improvements that would affect or be affected by the proposed project.

2008-2013 TIP*

ARC Number	<u>Route</u>	Type of Improvement	Scheduled Completion Year
FS-202B1	Roadway operational upgrades along Oakley Industrial Boulevard from Fayetteville Rd to Jonesboro Rd (SR 138)	Operational Upgrades	2012

**The ARC Board adopted the Envision6 RTP and FY 2008-2013 TIP on September 26th, 2007.*

Envision6 RTP (Long Range Projects)*

ARC Number	<u>Route</u>	Type of Improvement	Scheduled Completion Year
FS-AR-182	Interchange upgrade, I-85 at Senoia Rd (SR 74)	Interchange Upgrade	2030
FS-202B	Widening of Oakley Industrial Boulevard from Senoia Rd (SR 74) to Jonesboro Rd (SR 138)	Capacity	2020
FS-202C	Widening of Oakley Industrial Boulevard from Senoia Rd (SR 74) to Bohannon Rd	Capacity	2020
FS-202C	Widening of Oakley Industrial Boulevard from Bohannon Rd to Gulatt Rd	Capacity	2020

**The ARC Board adopted the Envision6 RTP and FY 2008-2013 TIP on September 26th, 2007.*

Other Projects

Project ID	<u>Route</u>	Type of Improvement	Scheduled Completion Year
GDOT PI 0009411	Intersection Improvement, Senoia Rd (SR 74) at Oakley Industrial Boulevard	Intersection	2012**

****Projected let date confirmed by Kaycee Mertz, GDOT Planning**

Summarize the transportation improvements as recommended by consultant in the traffic study for Southcreek V.

According to the findings, there will be some capacity deficiencies as a result of future year **background** traffic. Specifically, the intersection of Oakley Industrial Boulevard and Senoia Road (SR 74) will be at LOS E during the afternoon peaks. Recommended intersection improvement at Senoia Rd and Oakley Industrial Boulevard include the following improvements to improve the LOS to desired level of “D”:

- add a second SB left turn lane
- add an exclusive EB left turn lane

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?

The location is not currently served by transit. The closest transit service is MARTA route 180 along Roosevelt Highway (approximately three miles away).

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

None proposed.

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 Street Smarts, the intersection improvement at Oakley Industrial Boulevard and Senoia Road (SR 74) would be required based on the background traffic growth. Based on communication with Kaycee Mertz (GDOT Planning), project PI#9411, intersection of Oakley Industrial Boulevard and Senoia Road would add the second SB left turn lane, but does not include adding the EB left turn lane. ARC staff concludes that based on the traffic study and information received from GDOT, the EB left turn lane at the intersection of Oakley Industrial Boulevard and Senoia Road would be needed, and is not currently in the scope of planned project PI #9411.

CLOROX FAIRBURN DRI
City of Fairburn
Environmental Planning Division Review Comments

May 24, 2010

Water Supply Watershed Protection

The proposed project is located within the Line Creek Water Supply watershed, a small (less than 100 square mile) watershed which is a water supply source for both Coweta and Fayette counties, both of which are in the Metropolitan North Georgia Water Planning District. Under the Georgia Planning Act, all development in the watershed is subject to the DNR Part 5 Water Supply Watershed Minimum Criteria (Chapter 391-3-16-.01, Criteria for Water Supply Watersheds) unless alternative criteria are developed and adopted by the jurisdiction according to the requirements of the Part 5 criteria and approved by Georgia EPD and DCA. The minimum criteria include: a limit on impervious surface of either 25 percent of watershed area or the existing amount, whichever is greater; buffer requirements on perennial (blue-line) streams including a 75-foot buffer more than 7 miles upstream of the closest intake; and other requirements for hazardous materials and hazardous waste.

The City will need to determine if the proposal is within the 25 percent impervious coverage requirement for its portion of the basin, unless alternate criteria have been developed and approved.

Stream Buffers

Line Creek forms the northern and northeastern boundaries of the project property, as shown on the site plan. The site plan shows a 75-foot stream buffer along line creek, as well as along streams at the eastern and southern ends of the property. These buffers are consistent with Part 5 Water Supply Watershed Minimum Criteria, as well as the District Model Stream Buffer ordinance and the City of Fairburn stream buffer ordinance. The Georgia Department of Natural Resources (DNR) 25-foot erosion and sedimentation control buffer is also shown on these streams. Any other waters of the state on this property will also be subject to the 25-foot State erosion and sedimentation control buffer.

Storm Water/Water Quality

All projects should adequately address the impacts of the proposed development on stormwater runoff and downstream water quality. During construction, projects 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. The assumed impervious surface amounts and percentages are those that are typical for each land use type in the Atlanta Region. Actual loadings will reflect actual impervious amounts and other existing conditions on the site. The following table summarizes the results of the analysis for this proposal:

Estimated Pounds of Pollutants per Year

Land Use	Land Area (ac)	Total Phosphorus	Total Nitrogen	BOD	TSS	Zinc	Lead
Heavy Industrial	71.94	104.31	1384.13	9208.32	57192.30	119.42	15.11
TOTAL	71.94	104.31	1384.13	9208.32	57192.30	119.42	15.11

Total Percent Impervious: 80%

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.

REVIEW COMMENTS

Date: June 8, 2010

To: Mr. John Tuley
Atlanta Regional Commission

From: Tom Williams
Fayette County Planning and Zoning

RE: DRI 2110 – Southcreek V

We are in receipt of a DRI Report for Southcreek V, a proposed 1.5 million square foot. high cube warehouse/distribution facility in Fairburn. Having examined the Review Report, Fayette County has the following comments:

Traffic

This project, in combination with others recently approved in the vicinity of the I-85/SR74 interchange, will significantly affect the traffic operations in that area. This interchange is a critical link for Fayette County, as well as the Peachtree City and Tyrone to the Hartsfield-Jackson Atlanta International Airport area and the greater Atlanta region.

Traffic improvements associated with the Southcreek V project should include upgrades to the signalized intersection of Oakley Industrial Boulevard and SR 74 with the goal of minimizing the impacts of additional truck traffic to north and south bound traffic on SR 74. For example, dual north-bound turn lanes from Oakley Industrial to SR 74 would allow for a shorter signal phase and thus reduce impacts to SR 74.

Traffic improvements should be coordinated and consistent with the South Fulton Community Improvement District's priority transportation projects: 1) Oakley Industrial Boulevard Upgrades, and 2) SR 74/I-85 Interchange Modification Report.

Stormwater/Watershed Protection

The proposed project is located in the Line Creek Watershed which is a small water supply watershed for Fayette County. Fayette County has under construction Lake McIntosh, a 650 acre drinking water reservoir on Line Creek, down stream of the proposed DRI project. The impact of non point pollution from this facility should be a concern in design of the stormwater structures.

Therefore, to help our efforts in meeting water quality criteria and ensure the protection of downstream waters, we ask that a surface water monitoring program be incorporated into the project's stormwater management plan. The field data generated through such a plan are critical to assess the effectiveness of the water quality controls and provide indications when maintenance may be required on the Best Management Practices incorporated at the site. Without field data, downstream water users have no quantitative

means of checking that the current regulatory changes and BMP requirements are meeting their objective of protecting and/or improving the quality and health of our water resources.

The Review Report notes that a 75 foot undisturbed buffer was indicated on the plans. Currently Fayette County's watershed protection ordinance specifies a 100 foot undisturbed buffer with an additional 50 foot setback for Line Creek. Because buffers are an effective means of protecting water quality, we ask that the City of Fairburn require the same buffers and setbacks (i.e., greater than 75 feet) for this project to help protect this sensitive drinking water resource.

Fayette County further requests to be copied on all of the approved hydrology studies and other requirements of the stormwater management plan. If a surface water monitoring plan is required please have us copied on this as well.

Thank you for the opportunity to comment on this proposed development.

Cc: Pete Frisina
Phil Mallon
Tony Parrott

Developments of Regional Impact

[DRI Home](#)[DRI Rules](#)[Thresholds](#)[Tier Map](#)[FAQ](#)[Apply](#)[View Submissions](#)[Login](#)**DRI #2110****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:

Fairburn

Individual completing form:

Troy Besseche

Telephone:

770-683-4286

E-mail:

troy@fairburn.com

*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:

Southcreek V

Location (Street Address, GPS Coordinates, or Legal Land Lot Description):

Oakley Industrial Blvd. LL 0178 & LL0179, District 7

Brief Description of Project:

Distribution Warehouse

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.):	1,495,000
Developer:	Industrial Developments International
Mailing Address:	3740 Da Vinci Ct
Address 2:	Suite 300
	City:Norcross State: GA Zip:30092
Telephone:	770-866-1117
Email:	gminor@idi.com
Is property owner different from developer/applicant?	<input type="radio"/> (not selected) <input checked="" type="radio"/> Yes <input type="radio"/> No
If yes, property owner:	USAA Real Estate
Is the proposed project entirely located within your local government's jurisdiction?	<input type="radio"/> (not selected) <input checked="" type="radio"/> Yes <input type="radio"/> No
If no, in what additional jurisdictions is the project located?	
Is the current proposal a continuation or expansion of a previous DRI?	<input type="radio"/> (not selected) <input type="radio"/> Yes <input checked="" type="radio"/> No
If yes, provide the following information:	Project Name:
	Project ID:
The initial action being requested of the local government for this project:	<input type="checkbox"/> Rezoning <input type="checkbox"/> Variance <input type="checkbox"/> Sewer <input type="checkbox"/> Water <input type="checkbox"/> Permit <input checked="" type="checkbox"/> Other Permit Modification
Is this project a phase or part of a larger overall project?	<input type="radio"/> (not selected) <input type="radio"/> Yes <input checked="" type="radio"/> No
If yes, what percent of the overall project does this project/phase represent?	
Estimated Project Completion Dates:	This project/phase: 2011 - FEB Overall project: 2011 - FEB
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Developments of Regional Impact

[DRI Home](#)[DRI Rules](#)[Thresholds](#)[Tier Map](#)[FAQ](#)[Apply](#)[View Submissions](#)[Login](#)**DRI #2110**

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:	Fairburn
Individual completing form:	Troy Besseche
Telephone:	770-683-4286
Email:	troy@fairburn.com
Project Information	
Name of Proposed Project:	Southcreek V
DRI ID Number:	2110
Developer/Applicant:	Industrial Developments International
Telephone:	770-866-1117
Email(s):	gminor@idi.com
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.)	<input type="radio"/> (not selected) <input type="radio"/> Yes <input checked="" type="radio"/> No
If yes, has that additional information been provided to your RDC and, if applicable, GRTA?	<input checked="" type="radio"/> (not selected) <input type="radio"/> Yes <input type="radio"/> No
If no, the official review process can not start until this additional information is provided.	
Economic Development	
Estimated Value at Build-Out:	\$50M
Estimated annual local tax revenues (i.e., property tax, sales tax) likely to be generated by the proposed development:	\$112,500
Is the regional work force sufficient to fill the demand created by the proposed project?	<input type="radio"/> (not selected) <input checked="" type="radio"/> Yes <input type="radio"/> No
Will this development displace	

any existing uses?	<input type="radio"/> (not selected) <input type="radio"/> Yes <input checked="" type="radio"/> No
If yes, please describe (including number of units, square feet, etc):	
Water Supply	
Name of water supply provider for this site:	City of Fairburn
What is the estimated water supply demand to be generated by the project, measured in Millions of Gallons Per Day (MGD)?	.002MGD
Is sufficient water supply capacity available to serve the proposed project?	<input type="radio"/> (not selected) <input checked="" type="radio"/> Yes <input type="radio"/> No
If no, describe any plans to expand the existing water supply capacity:	
Is a water line extension required to serve this project?	<input type="radio"/> (not selected) <input type="radio"/> Yes <input checked="" type="radio"/> No
If yes, how much additional line (in miles) will be required?	
Wastewater Disposal	
Name of wastewater treatment provider for this site:	City of Fairburn by contract with Fulton County
What is the estimated sewage flow to be generated by the project, measured in Millions of Gallons Per Day (MGD)?	.002 MGD
Is sufficient wastewater treatment capacity available to serve this proposed project?	<input type="radio"/> (not selected) <input checked="" type="radio"/> Yes <input type="radio"/> No
If no, describe any plans to expand existing wastewater treatment capacity:	
Is a sewer line extension required to serve this project?	<input type="radio"/> (not selected) <input type="radio"/> Yes <input checked="" type="radio"/> 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.)	161 VPH
Has a traffic study been performed to determine whether or not transportation or access improvements will be needed to serve this project?	<input type="radio"/> (not selected) <input checked="" type="radio"/> Yes <input type="radio"/> No
Are transportation improvements needed to serve this project?	<input type="radio"/> (not selected) <input checked="" type="radio"/> Yes <input type="radio"/> No
If yes, please describe below: Improvements are presently programmed by GDOT to be completed prior to site build-out.	
Solid Waste Disposal	

How much solid waste is the project expected to generate annually (in tons)?	261 tons per year
Is sufficient landfill capacity available to serve this proposed project?	<input type="radio"/> (not selected) <input checked="" type="radio"/> Yes <input type="radio"/> No
If no, describe any plans to expand existing landfill capacity:	
Will any hazardous waste be generated by the development?	<input type="radio"/> (not selected) <input type="radio"/> Yes <input checked="" type="radio"/> No
If yes, please explain:	
Stormwater Management	
What percentage of the site is projected to be impervious surface once the proposed development has been constructed?	83%
Describe any measures proposed (such as buffers, detention or retention ponds, pervious parking areas) to mitigate the project's impacts on stormwater management: 25-foot state undisturbed stream buffer; 50-foot local undisturbed stream buffer; enhanced swales; forebays; stormwater pond (wet).	
Environmental Quality	
Is the development located within, or likely to affect any of the following:	
1. Water supply watersheds?	<input type="radio"/> (not selected) <input type="radio"/> Yes <input checked="" type="radio"/> No
2. Significant groundwater recharge areas?	<input type="radio"/> (not selected) <input type="radio"/> Yes <input checked="" type="radio"/> No
3. Wetlands?	<input type="radio"/> (not selected) <input checked="" type="radio"/> Yes <input type="radio"/> No
4. Protected mountains?	<input type="radio"/> (not selected) <input type="radio"/> Yes <input type="radio"/> No
5. Protected river corridors?	<input type="radio"/> (not selected) <input type="radio"/> Yes <input checked="" type="radio"/> No
6. Floodplains?	<input type="radio"/> (not selected) <input type="radio"/> Yes <input checked="" type="radio"/> No
7. Historic resources?	<input type="radio"/> (not selected) <input type="radio"/> Yes <input checked="" type="radio"/> No
8. Other environmentally sensitive resources?	<input type="radio"/> (not selected) <input type="radio"/> Yes <input checked="" type="radio"/> No
If you answered yes to any question above, describe how the identified resource(s) may be affected: Wetland impact is limited to .12 acres and has been properly permitted with the Corps of Engineers and properly mitigated.	
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