



# REGIONAL REVIEW FINDING

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DATE: MAY 6, 2014

ARC REVIEW CODE: V1404251

TO: MAYOR JERE WOOD, CITY OF ROSWELL  
ATTN TO: JACKIE DEIBEL, PLANNER III  
FROM: Douglas R. Hooker, Executive Director, ARC

The Atlanta Regional Commission (ARC) has completed regional review of the following proposal. Below is the ARC finding. The Atlanta Regional Commission reviewed the proposed project 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.

**Name of Proposal:** RC-14-01R 180 Azalea Drive (Azalea Townhomes)

**Submitting Local Government:** City of Roswell

**Review Type:** Metro River

**Date Opened:** April 25, 2014

**Date Closed:** May 5, 2014

**FINDING:** ARC staff has completed the review of the application for a Metro River Certificate for this proposed project in the Chattahoochee River Corridor. Our finding is that the proposed project is consistent with the Chattahoochee Corridor Plan.

**Additional Comments:** Comments were received from the National Park Service and are attached for your information. The comments do not affect ARC's final finding on this review. We concur with recommendations, except for the stream buffer item. The stream on this property does not meet the standard for the 35-foot tributary buffer in the Corridor Plan. It is, however, under the jurisdiction of the Roswell Stream Buffer Ordinance and a variance under that ordinance will be necessary for approval of the project. We recommend that the Park Service work with the City using the City Buffer Ordinance as a basis for any buffer that is required.

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

ARC LAND USE PLANNING  
NATIONAL PARK SERVICE  
COBB COUNTY

ARC ENVIRONMENTAL PLANNING  
CHATTAHOOCHEE RIVERKEEPER  
CITY OF SANDY SPRINGS

GEORGIA DEPARTMENT OF NATURAL RESOURCES  
GEORGIA CONSERVANCY

If you have any questions regarding this review, please contact Andrew Smith at (404) 463-5581 or [asmith@atlantaregional.com](mailto:asmith@atlantaregional.com). This finding will be published to the ARC website.

The ARC review website is located at: <http://www.atlantaregional.com/land-use/planreviews>.



## United States Department of the Interior

National Park Service  
Chattahoochee River  
National Recreation Area  
1978 Island Ford Parkway  
Sandy Springs, GA 30350



IN REPLY REFER TO:

L7619 (CHAT)

May 2, 2014

Andrew Smith  
Atlanta Regional Commission  
40 Courtland Street, NE  
Atlanta, GA 30303

Dear Mr. Smith:

This letter is a confirmation of receipt of the Metropolitan River Protection Act (MRPA) Review Notification, RC-14-01R for 180 Azalea Drive (Azalea Townhomes), Fulton County, Georgia. The project proposes the construction of 22 townhomes and 2 single-family homes within the 2000-foot MRPA Chattahoochee River Corridor.

The Chattahoochee River National Recreation Area (CRNRA), a unit of the National Park Service (NPS), was established by Congress in 1978 to assure the preservation and protection of a 48-mile stretch of the Chattahoochee River and certain adjoining lands from Buford Dam to Peachtree Creek. CRNRA consists of the river and its bed along with the lands, waters, and interests within the park's authorized boundary. The NPS has a vested interest in preserving the water quality, view shed, and the natural condition of the river corridor for the various ecological, biological, and recreational services it provides to the general public.

Conceptually, the proposed development of 22 townhomes and 2 single-family homes offers benefits over the alternative which includes approximately 13 single-family homes. However, the NPS has concerns that the total land disturbance and impervious surface areas have been approved at the maximum levels allowed for the vulnerability categories of C, D, and E. The concerns with recommendations are summarized below:

### Erosion and Sedimentation

In general, to protect the river and water quality during construction, the NPS emphasizes the use of Best Management Practices (BMPs) designed and implemented to comply with the standards and specifications outlined in the *Manual for Erosion and Sediment Control in Georgia* (Georgia Soil and Water Conservation Commission, 2002 or latest edition). An approved erosion and sedimentation control plan should be implemented before soil disturbances occur within the project site to avoid violating the Erosion and Sedimentation Act of 1975.

**Recommendation:** It is critical, because of the size and proximity of this project to the river that after proper installation, continued and unfailing maintenance and repair of the BMPs should be undertaken to ensure their effectiveness throughout the duration of the project.

#### Stormwater Runoff

The issue of storm water management lies outside the purview of the Atlanta Regional Commission (ARC) plan review process; however, land disturbance and increased impervious surface area, which are leading sources of stormwater runoff problems, are within the authority of the ARC within the 2000ft Chattahoochee River Corridor. Stormwater runoff within the watershed is of upmost concern to CRNRA as it is a major source of nonpoint source pollution in the river.

**Recommendation:** If the ARC decides to approve the maximum allowance for land disturbance and impervious surface area for this project, we ask that stormwater management practices be recommended to include current and up-to-date smart-growth techniques and low-impact design elements to address the impacts from a development with this density.

#### Restore and Maintain the 35ft MRPA Stream Buffer

The project requires the placing of 292 feet of perennial stream into a pipe for the construction of road access to the townhomes. The channelizing and confinement of stormwater runoff will result in increased velocity into the outflow area further degrading the banks of the stream between the outflow and its confluence with the Chattahoochee River.

**Recommendation:** The NPS requests that the applicant augment the stream buffer between the pipe outfall and the confluence of the river to the meet the 35ft MRPA stream buffer requirement. The installation of native riparian vegetation would reinforce the stream banks to partially withstand the effects of the project's increased stormwater flow velocity. Re-creating a healthy riparian buffer in such a visible and degraded area would go far in benefitting the recreational, ecological, and biological services in this section of the Chattahoochee River.

#### Introduce/Promote Non-native Species

Construction activities have the potential to transport exotic invasive plant and animal species from one area to another.

**Recommendation:** We recommend that all equipment be washed and cleaned of mud and debris that may transport unwanted pests. The NPS encourages the project applicant to use only native grass seed or native vegetation for stabilizing the project area following construction.

Landscaping with native plant species provides attractive, hardy, drought resistant yards which require less water, fertilizer, and pesticides.

**Recommendation:** NPS encourages the use native plant species for landscaping.

#### Cumulative Impacts

As the Atlanta metropolitan region grows, incremental impacts from many small-scale projects contribute significantly to overall land-disturbance within the Chattahoochee River corridor. CRNRA is concerned that the growing number of applications, permits, and variances within the Chattahoochee River Corridor pose a cumulative threat to the protection of the river.

**Recommendation:** We request that the City of Roswell review process for all land-disturbing activities consider the cumulative impacts from erosion and sedimentation, stormwater management, and spread of non-native invasive species.

We appreciate your consideration of these comments and ongoing involvement with the project. Please feel free to contact the park's Natural Resources Program Manager, Paula Capece, directly if you have any questions or concerns that we could help to address. She can be reached at 678-538-1322 or by email at [Paula\\_Capece@nps.gov](mailto:Paula_Capece@nps.gov).

Sincerely,

A handwritten signature in dark ink, appearing to read "Will L. Cox", written in a cursive style.

William L. Cox  
Superintendent