



# REGIONAL REVIEW FINDING

Atlanta Regional Commission • 40 Courtland Street NE, Atlanta, Georgia 30303 • ph: 404.463.3100 • fax: 404.463.3105 • [www.atlantaregional.com](http://www.atlantaregional.com)

DATE: JUNE 16, 2014

ARC REVIEW CODE: V1406061

TO: MAYOR MIKE BODKER, CITY OF JOHNS CREEK  
ATTN TO: JENNIFER GLENN, PLANNER, DEPARTMENT OF COMMUNITY DEVELOPMENT  
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-14-01JC Fulton County Chattahoochee III Pump Station

**Submitting Local Government:** City of Johns Creek

**Review Type:** Metro River

**Date Opened:** June 6, 2014

**Date Closed:** June 16, 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 FOLLOWING LOCAL GOVERNMENTS AND AGENCIES RECEIVED NOTICE OF THIS REVIEW:

ARC LAND USE PLANNING  
NATIONAL PARK SERVICE  
GWINNETT COUNTY

ARC ENVIRONMENTAL PLANNING  
CHATTAHOOCHEE RIVERKEEPER  
CITY OF DULUTH

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)

June 16, 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-14-01JC for Fulton County Chattahoochee Pump Station III, Fulton County, Georgia. The project proposes the construction of additional impervious surface area at an existing sanitary sewer pump station 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. Because of this project's proximity to the Chattahoochee River, the NPS has concerns regarding potential impacts to park resources. With this in mind, the NPS has the following concerns and recommendations:

## 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:** 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.

#### Installation of Impervious Surface

The addition of impervious surface in the form of roads, parking lots, and other facilities common of urban development contributes to the growing problem of uncontrolled storm water runoff and resulting pollutant loads. This leads to adverse effects on hydrology and ecological functions of the Chattahoochee River and its tributaries.

**Recommendation:** We request that the applicant consider the use of pervious materials in road, drive, and parking areas.

#### Stormwater Runoff

The issue of storm water management lies outside the purview of the Atlanta Regional Commission (ARC) plan review process; however, it is of utmost concern to CRNRA, as stormwater runoff within the watershed is a major source of nonpoint source pollution in the river. As the plans move forward to local review, we ask that storm water management options to be carefully deliberated to avoid impacts from the addition of impervious surfaces such as buildings, roads, drives, and parking areas.

**Recommendation:** We ask that stormwater management practices include current and up-to-date smart-growth techniques and low-impact design elements that address the impacts of additional hardscape.

#### 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.

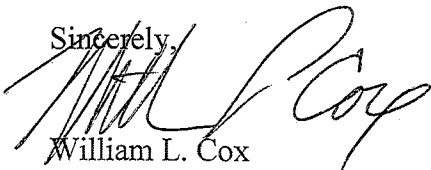
#### Cumulative Impacts

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 local 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.

Sincerely,



William L. Cox  
Superintendent