



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: NOVEMBER 19, 2014

ARC REVIEW CODE: V1410271

TO: MAYOR NANCY HARRIS, CITY OF DULUTH
ATTN TO: NICK COLONNA, COMMUNITY DEVELOPMENT DIRECTOR
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-14-01D 1 Inspiration Drive
Submitting Local Government: City of Duluth

Review Type: Metro River

Date Opened: October 27, 2014

Date Closed: November 6, 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. ARC has also attached a memo clarifying certain information related to the comments received from the National Park Service.

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

ARC NATURAL RESOURCES DIVISION
GEORGIA CONSERVANCY
CITY OF JOHNS CREEK

ARC COMMUNITY DEVELOPMENT DIVISION
GEORGIA DEPARTMENT OF NATURAL RESOURCES

CHATTAHOOCHEE RIVERKEEPER
NATIONAL PARK SERVICE

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

Douglas R. Hooker
Atlanta Regional Commission
40 Courtland Street, NE
Atlanta, GA 30303

November 4, 2014

Dear Mr. Hooker,

This letter is a notification of receipt of the MRPA Review Notification RC-14-01D, 1 Inspiration Drive, for the development of 77 single family lots, an equestrian estate, and a reserve parcel within the Chattahoochee River Corridor in Duluth, Georgia. The proposed project lies on approximately 141 acres of land within the Chattahoochee River Corridor.

Congress established the Chattahoochee River National Recreation Area (CRNRA), a unit of the National Park Service (NPS), in 1978 to assure the preservation and protection of a 48-mile stretch of the Chattahoochee River 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. Congress expressly provided the Secretary of the Interior, acting through the National Park Service (NPS) and CRNRA, with the authority to protect the "natural, scenic, recreation, historic and other values" of the Chattahoochee River. Due to both the scale of the proposed project and its proximity to the Chattahoochee River, there is a high potential that the project will impair park resources. It is with these concerns in mind that NPS offers the following comments and recommendations:

Pre-planning, Design, and Management Elements:

Floodplain

According to the Gwinnett County online Floodplain Insurance Rate Map, the property site for this proposed development is within the floodplain zones AE and X.

Comment: The NPS requests a review to determine if the development is within the floodplain area. The potential effects of placing a development of this scale and magnitude within the floodplain of the Chattahoochee River need to be analyzed.

Access to the Development

It is the understanding of the NPS that the applicant's property is accessed through a 20-foot wide drive that runs between a neighboring residential development and a 2-acre NPS-owned land parcel. In order to develop this 141-acre parcel of land, the applicant will need substantially more access to accommodate vehicular traffic.

Comment: The NPS requests to see the applicant's plans for accessing this property.

Control of 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 upmost concern to the park. As the plans move forward for local review, we ask that storm water management options be carefully deliberated. The impacts of the development from the addition of impervious surfaces such as homes, roofs, patios, decks, and driveways needs to be carefully analyzed.

Recommendation: If the project is approved to move forward, it should be designed to limit increases in impervious surface area inside the designated 2000-foot Chattahoochee River Corridor. We ask that storm water management practices include current and up-to-date smart-growth techniques and low-impact design elements that address the impacts of additional hardscape.

Restore and Maintain the 50-foot MRPA River Buffer

Past practices from the sand dredging operation have impacted the river bank in the area of this proposed project.

Recommendation: The NPS requests that the applicant restore the river buffer to meet the 50-foot MRPA no disturb river buffer requirement.

Equestrian Facility

Agricultural non-point source pollution from runoff is a dominant source of water quality impairment on rivers and streams throughout the United States. Horses and other large farm animals create large amounts of waste that, if not managed effectively, will enter the river system and alter water quality. Sources of non-point pollution from equestrian facilities include animal waste, pesticides and fertilizers, and runoff from overused and mismanaged pastures.

Recommendation: The NPS requests that if the project is approved, the 50-foot no disturb river buffer be enforced for the protection of the river's water quality from the equestrian facility. Additionally, we request the use of best management practices that control the volume and flow of stormwater to reduce the transport of soil and waste to the river. The NPS recommends that any approvals of the facility include: full containment of the equestrian facility to remove any potential for a release of stormwater, implementing nutrient management plans; limiting the use of pesticides and minimizing pesticide movement from necessary applications; keeping livestock out of sensitive areas including the river and stream buffers; managing for healthy pastures by rotating livestock; and limiting the use of pastures when soils are wet.

Landscaping with Native Species

Landscaping with native plant species benefits the natural environment. Native plants require less water, fertilizer, and pesticides, therefore costing less in maintenance, as according to the EPA, an acre of non-native turf grass can cost up to \$20,000.00 per year in maintenance. Furthermore, native plants promote stewardship of our natural heritage by supporting pollinators, birds, and other wildlife while supporting biological diversity and ecological functions.

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

During Construction Activities:

Erosion and Sedimentation

In general, to protect the stream and water quality during construction, Best Management Practices (BMPs) should be 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). 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 guaranteed to ensure their effectiveness and specifically to control, as far as possible, the effects of this project on the river.

Introduction/Promotion of Non-native Species

Construction activities have the potential to transport exotic invasive plant and animal species.

Recommendation: We request 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. Non-native species are easily transported downstream and can start new colonies in CRNRA.

We appreciate your consideration of these comments and ongoing involvement with the project. Please feel free to contact me directly if you have any questions or concerns that we could help to address. I can be reached at 678-538-1321 or by email at Deanna_Greco@nps.gov.

Sincerely,



Deanna Greco
Chief of Planning and Resource Management

Date: November 19, 2014



Subject: Notes on Park Service Comments – Inspiration Drive/Castlemaine Review, City Of Duluth (RC-14-01D)

Floodplain

The river floodplain on this property has been addressed in the review. The land in the 100-year floodplain of the river (Zone AE) is in the E vulnerability category, which limits land disturbance and impervious surface, respectively, to 30 percent and 15 percent of the total E area (both in and out of the floodplain) in the parcels under review. Other floodplain requirements, including fill to raise floor elevations and cut to compensate for the volume of the fill, must be accomplished within the disturbance and impervious limits in the floodplain. The applicant has verified the floodplain elevations shown on the plans and has transferred much of the allowable land disturbance and impervious surface out of the floodplain. The land in the 500-year floodplain (Zone X), does not have the same restrictions as the 100-year floodplain, but must still meet the limits on land disturbance and impervious surface required in all categories in the Corridor.

Access to Development

The applicant will need to work with adjacent property owners to obtain access to the property. Any new or expanded access will need to be covered by existing or approved land disturbance or impervious surface, or a new review of the land containing the proposed access will be required.

Equestrian Facility

The equestrian facility is an equestrian estate that currently exists on the property. The submitted plans show no change or increase in the existing use.