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DATE: MARCH 15, 2016

ARC REVIEW CODE: V1603032

Dougas L. Hofe

TO:

MAYOR RUSTY PAUL, CITY OF SANDY SPRINGS

ATTN TO:

MICHAEL BARNETT, CHIEF ENVIRONMENTAL COMPLIANCE OFFICER

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-16-01SS 1640 Winterthur Close Submitting Local Government: City of Sandy Springs

Review Type: Metro River

Date Opened: March 3, 2016

Date Closed: March 14, 2016

<u>FINDING:</u> ARC staff has completed the review of the application for a Metro River Certificate for this proposed project in the Chattahoochee River Corridor. ARC's finding is that the proposed project is consistent with the Chattahoochee Corridor Plan.

<u>Additional Comments:</u> ARC received comments from the staff of the National Park Service-Chattahoochee River National Recreation Area. The comments are attached to this Finding.

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

ARC COMMUNITY DEVELOPMENT DIVISION
CHATTAHOOCHEE RIVERKEEPER

ARC NATURAL RESOURCES DIVISION GEORGIA CONSERVANCY

GEORGIA DEPARTMENT OF NATURAL RESOURCES 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



IN REPLY REFER TO: L7619 (CHAT)

March 11, 2016

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

Dear Mr. Smith,

This letter is a notification of receipt of the MRPA Review Notification RC-16-01SS 1640 Winterthur Close, for the City of Sandy Springs, Georgia. This project will involve home renovations include the construction of a garage, pool, paving, steps, wall, and AC pad. The analysis estimates that a total of 18,737 square feet of land will be disturbed and that 3,106 square feet of impervious area will be added to the site, for a total impervious area of 12,365.5 square feet.

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. We are concerned that the project could cause detrimental impacts to park resources if proper Best Management Practices (BMPs) are not followed and maintained. It is with these concerns in mind that NPS offers the following comments and recommendations:

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, 2014). 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.

Currently, the area surrounding the proposed project site is listed as unimpaired on the state of Georgia's 303(d) listing for not fully meeting its designated uses. CRNRA is vested in improving the current state of this water body, and any addition of sediment or run-off would further disrupt the current water quality condition. Due to the proximity of this proposed project

to the Chattahoochee River, caution is advised to prevent a flush of sediment deposits during the construction process.

Recommendation: After proper installation, continued and unfailing maintenance and repair of the BMP's should be guaranteed in order to ensure their effectiveness and specifically to control, as far as possible, the effects of this project on the river.

Introduce/Promote 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 before being brought on-site. 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.

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 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 be carefully deliberated to avoid impacts from the addition of impervious surfaces such as buildings, drives, and parking areas.

Recommendation: The project should be designed to limit increases in impervious surface area inside the designated 2000-foot Chattahoochee River Corridor. 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.

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 permits issued for construction purposes pose a cumulative threat to the protection of the river corridor.

Recommendation: We request that the City of Sandy Springs 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. Please feel free to contact park's Chief of Planning and Resource Management, Deanna Greco, directly if you have any questions or concerns that we could help to address. She can be reached at 678-538-1321 or by email at Deanna Greco@nps.gov.

Thank you,

Beanna Greco (

Acting-Superintendent