



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: August 15, 2016

ARC REVIEW CODE: V1608031

TO: Chairman Tim Lee, Cobb County Board of Commissioners
ATTN TO: David Breaden, Senior Engineer, Stormwater Management Division
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-16-03CC 610 Club Drive
Submitting Local Government: Cobb County

Review Type: Metro River

Date Opened: August 3, 2016

Date Closed: August 13, 2016

FINDING: 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.

Additional Comments: See attached comments from National Park Service/CRNRA.

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

ARC COMMUNITY DEVELOPMENT
CHATTAHOOCHEE RIVERKEEPER
THE RIVER LINE HISTORIC AREA, INC.

ARC NATURAL RESOURCES
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)

August 8, 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-16-03CC 610 Club Drive, for Cobb, County, Georgia. This project will involve the construction of a single family residence, including a pool and deck. The analysis estimates that 28,795 square feet of land disturbance and that 17,277 square feet of impervious area meet the criteria for vulnerability category D.

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 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, 2016). 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.

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, drives, and parking areas.

Recommendation: The project should be designed to limit increases in impervious surface area. 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.

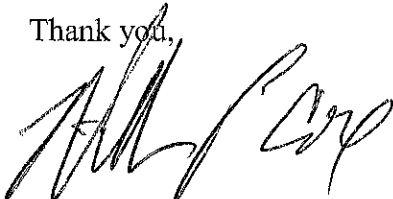
Cumulative Impacts

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 City of Atlanta 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,

A handwritten signature in black ink, appearing to read 'W. L. Cox', is written over the printed name.

William L. Cox
Superintendent