



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: OCTOBER 21, 2016

ARC REVIEW CODE: V1610101

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-16-02R 1377 Old Riverside Road
Submitting Local Government: City of Roswell

Review Type: Metro River

Date Opened: October 10, 2016

Date Closed: October 20, 2016

FINDING: ARC staff has completed the review of the application for a MRPA 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 the attached comments received from the National Park Service/CRNRA.

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

ARC COMMUNITY DEVELOPMENT
CHATTAHOOCHEE RIVERKEEPER
CITY OF SANDY SPRINGS

ARC NATURAL RESOURCES
GEORGIA CONSERVANCY

GEORGIA DEPARTMENT OF NATURAL RESOURCES
NATIONAL PARK SERVICE/CRNRA

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)

October 12, 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-16-02R 1377 Old Riverside Road, for the City of Roswell in Fulton, County, Georgia. This project will involve the construction of a house, sports court, pool, garage, and drive on a vacant lot within the 100 year floodplain. The analysis estimates that 13,908 square feet of land disturbance and that 6,954 square feet of impervious area meet the criteria for vulnerability category "E".

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 impaired 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. Specific BMP's should be installed and maintained in order to prevent.

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.

Landscaping with Native Species

Landscaping with native plant species provides a beautiful, hardy, drought resistant yard that benefits the natural environment. It requires less water, fertilizer, and pesticides, therefore costing less 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:

Currently, the non-native sericea lespedeza (*Lespedeza cuneate*) and weeping lovegrass (*Eragrostis curvula*) are listed as a potential vegetative covers after construction. Sericea lespedeza is classified as a Category 1 Exotic Plant meaning it is a serious problem in Georgia's natural areas by extensively invading native plant communities and displacing native species. While weeping lovegrass is classified as a Category 3 Exotic Plant meaning it is currently only a minor problem in Georgia natural areas, but is known to be problematic in adjacent states. Planting these species within the floodplain and adjacent to park units increases the chance of dispersal onto park property which could drastically impact the natural areas. NPS strongly encourages the revision of the vegetation covers to exclude any exotic invasive plants and urges the use native plant species for landscaping.

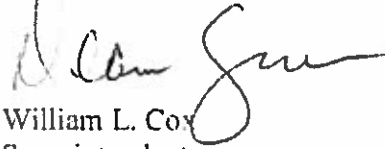
Cumulative Impacts

The amount of impervious surface estimated for this property is 15 sqft under the maximum allowable impervious surface. This, combined with the proposed project's proximity to the Chattahoochee River, is a reason for concern. 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 Fulton County 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. Cox", written over a faint circular stamp.

William L. Cox
Superintendent