



COVER SHEET FOR COMMUNITY PLANNING SUBMITTALS

Name(s) of Submitting Government(s):	City of Palmetto
RC:	ARC
Submittal Type:	Comp Plan Update
Preparer:	□ RC □ Local Government □ Consultant:
Cover Letter Date: 5/11/18	
Date Submittal Initially Received by RC:	05/10/18
Explain Unusual Time-lags or Other Anom	alies, when present:

Inaccurate/incomplete information, above, and nonconformity with the standards articulated, below, are reportable as performance errors under the terms of the annual DCA/RC contract and may lead to adverse audit findings.

- <u>ALL</u> SUBMITTALS MUST BE TRANSMITTED ELECTRONICALLY USING THE DEPARTMENT'S SHAREPOINT SITE.
- COMBINE <u>ALL</u> INDIVIDUAL IMAGES, DOCUMENTS AND SPREADSHEETS INTO <u>ONE SINGLE, SEARCHABLE PDF</u> (INCLUDING COVER LETTERS, APPENDICES, ETC.), PUT THIS COMPLETED FORM AS THE FIRST PAGE OF THE PDF AND THEN UPLOAD IT.
- REVISED SUBMITTALS <u>MUST INCLUDE THE ENTIRE DOCUMENT</u>, NOT ONLY THE REVISED PORTION.
- EMAILED OR HARDCOPY MATERIALS <u>CANNOT</u> BE ACCEPTED.
- ALL SUBMITTALS MUST BE CHANNELED THROUGH THE APPROPRIATE REGIONAL COMMISSION.



REGIONAL REVIEW NOTIFICATION

Atlanta Regional Commission • 229 Peachtree Street NE | Suite 100 | Atlanta, Georgia 30303 • ph: 404.463.3100 fax: 404.463.3205 • atlantaregional.org

DATE: May 11, 2018 **ARC REVIEW CODE:** P0511182

TO: Mayor Clark Boddie, City of Palmetto

ATTN TO: Cindy Hanson, City Clerk

FROM: Douglas R. Hooker, Executive Director, ARC

Digital signature Original on file

Dragh R. Hok

The Atlanta Regional Commission (ARC) has received the following proposal and is initiating a regional review to seek comments from potentially impacted jurisdictions and agencies. The ARC requests your comments related to the proposal not addressed by the Commission's regional plans and policies.

Name of Proposal: 2017 City of Palmetto Comprehensive Plan Update

Review Type: Local Comprehensive Plan

Description: A review of the 2017 Update to the City of Palmetto Comprehensive Plan.

Submitting Local Government: City of Palmetto

Action Under Consideration: Approval

Date Opened: May 11, 2018

Deadline for Comments: June 1, 2018

Earliest the Regional Review can be Completed: Upon approval by Georgia DCA

THE FOLLOWING LOCAL GOVERNMENTS AND AGENCIES ARE RECEIVING NOTICE OF THIS REVIEW:

ARC COMMUNITY DEVELOPMENT
ARC RESEARCH & ANALYTICS
GEORGIA DEPARTMENT OF NATURAL RESOURCES
FAYETTE COUNTY
CITY OF CHATTAHOOCHEE HILLS

ARC TRANSPORTATION ACCESS & MOBILITY ARC AGING & HEALTH RESOURCES GEORGIA DEPARTMENT OF TRANSPORTATION COWETA COUNTY

ARC NATURAL RESOURCES
GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS
GEORGIA REGIONAL TRANSPORTATION AUTHORITY
THREE RIVERS REGIONAL COMMISSION
TOWN OF TYRONE

Attached is information concerning this review.

If you have any questions regarding this review, please contact Robert Herrig at RHerrig@atlantaregional.org or 470-378-1636. If ARC staff does not receive comments from you on or before June 1, 2018, we will assume that your agency has no comments and will close the review. Comments via e-mail are strongly encouraged. The ARC review website is located at http://www.atlantaregional.org/land-use/planreviews.

NOTICE OF LOCAL PLAN SUBMITTAL AND HEARING/COMMENT OPPORTUNITY

Submitting Local Government:	City of Palmetto	Date Received:	May 11, 2018			
Local Contac	t: Cindy Hanson, City Clerk, City of Palmetto					
Phone:	770-463-3377	E-Mail:	hanson@citypalmetto.com			
Fax:		Website:	http:\\www.citypalmetto.com			
Street	P.O. Box 190, 509 Toombs Street	City State, Zip:	Palmetto, Georgia 30268			
	Department of Com	•	eview Required			
Review Title:	2017 City of Palmetto Comp	rehensive Plan U	pdate			
Description: A review of the 2017 Update to the City of Palmetto Comprehensive Plan. Document can be viewed on the ARC website at: http://www.atlantaregional.org/landuse Under Plan Review, search for the City of Palmetto.						
	ed documents are available for re	view at ARC and	the local government.			
Reviewing R	egional Development Center:					
229 Peachtre International	onal Commission ee Street NE, Suite 100, Tower, Atlanta, GA 30303					
Phone 404-4	63-3100 Fax 404-463-3254					
Contact Robert Herrig, Planner Person:						
E-Mail	RHerrig@atlantaregional.org					

	ARC STAFF NOTICE OF REGIONAL REVIEW AND COMMENT FORM							
DATE:	DATE : May 11, 2018 ARC REVIEW CODE : P0511182							
то.	TO: ADC Managars							
TO:	ARC Managers: Robert Herrig, Planner 470-378-1636							
FROIVI	Reviewing staff by Jurisdiction:							
	neviewing stair by surisdiction.							
Comm	unity Development: Douse, Sidney <u>Transportation Access & Mobility:</u> Spiliotis, Andrew							
	al Resources: Santo, Jim Research & Analytics: Skinner, Jim							
Aging (<u>& Health Resources:</u> Perumbeti, Katie							
Review Descrip Submit Date C Deadli	of Proposal: 2017 City of Palmetto Comprehensive Plan Update v Type: Local Comprehensive Plan ption: A review of the 2017 Update to the City of Palmetto Comprehensive Plan. tting Local Government: City of Palmetto Dpened: May 11, 2018 ne for Comments: June 1, 2018 tthe Regional Review can be Completed: Upon approval by Georgia DCA							
	Response:							
1)	☐ Proposal is CONSISTENT with the following regional development guide listed in the comment section.							
2)	2) Uhile neither specifically consistent nor inconsistent, the proposal relates to the following regional development guide listed in the comment section.							
3)								
4)	☐ The proposal is INCONSISTENT with the following regional development guide listed in the comment section.							
5)	☐ The proposal does NOT relate to any development guide for which this division is responsible.							
6)								
	COMMENTS:							
1								



City Of Palmetto

A. G. Box 190 Palmetto, Georgia 30268 Area Code 770 / 463-3377

J. Clark Boddie Mayor

May 10, 2018

Atlanta Regional Commission 229 Peachtree Street Suite 100 Atlanta, Georgia 30303

RE: Comprehensive Plan Update Submittal

City of Palmetto has completed an update of its comprehensive plan and is submitting it with this letter for review by the Atlanta Regional Commission and the Department of Community Affairs.

I certify that we have held the required public hearings and have involved the public in development of the plan in a manner appropriate to our community's dynamics and resources. Evidence of this has been included with our submittal.

I certify that appropriate staff and decision-makers have reviewed both the Regional Water Plan covering our area and the Rules for Environmental Planning Criteria (O.C.G.A. 12-2-8) and taken them into consideration in formulating our plan.

If you have any questions concerning our submittal, please contact Cindy Hanson at 770-463-3377 or hanson@citypalmetto.com.

cerely.

J. Clark Boddie Mayor

City of Palmetto

Enclosures

The City of Palmetto 2017 Comprehensive Plan Update





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City of Palmetto Mayor and City Council

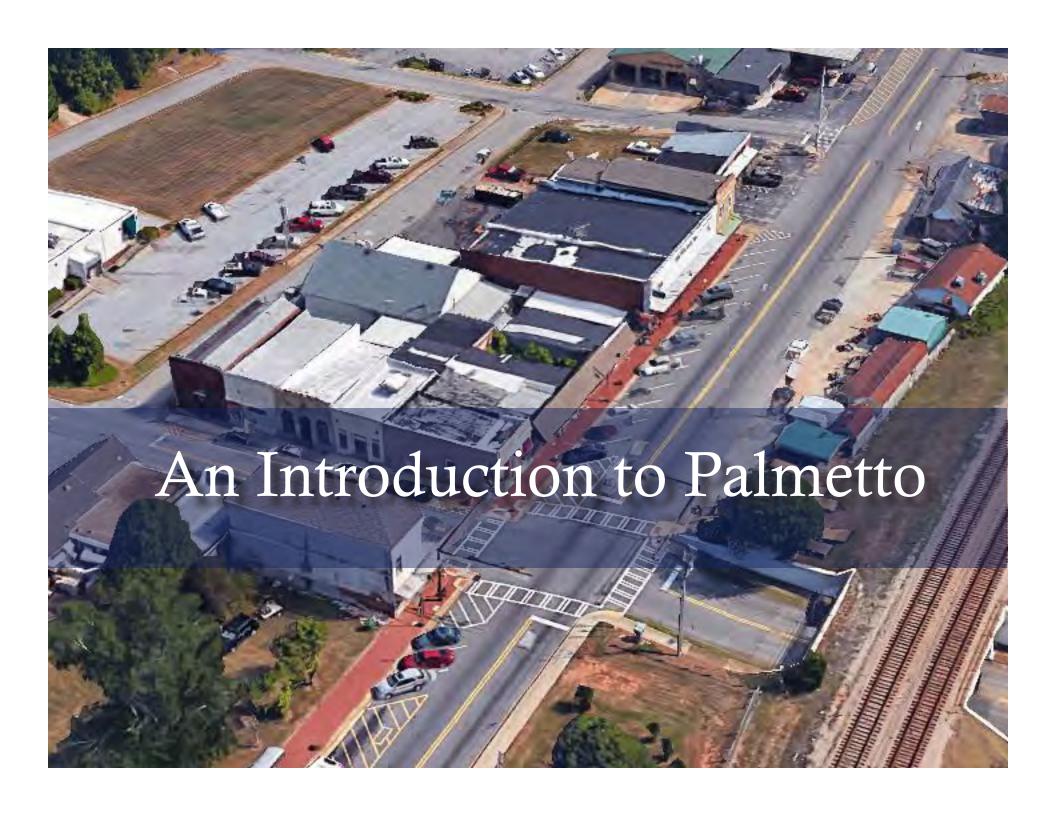
Mayor J. Clark Boddie Tara Miller Laura Mullis Larry Parrott Michael Arnold Nathan Slaton Patty O'hara Willey

City of Palmetto City Staff

William Shell, City Administrator Cindy Hanson, City Clerk

Atlanta Regional Commission Staff

Jared Lombard, AICP Allison Duncan, AICP Sydney Douse, AICP



The City of Palmetto last updated their Comprehensive Plan in 2010. This document is an update to that plan with updated policies, data and work program.

In Georgia, cities, towns and counties, must update their Comprehensive Plans every five years as required by the Minimum Standards of Local Comprehensive Planning. The development of a Comprehensive Plan helps a community to:

- Develop a Vision for what it wants
- Establish Priorities
- Encourage dialogue and actions
- Guide decision making
- Determine how to best allocate limited resources

Data analysis and the community's ideas for the future are combined and turned into action areas. The plan focuses on the main elements to improve the City of Palmetto with implementation plans to enhance the assets and address the issues of the City of Palmetto. The plan is divided up in into 6 interrelated sections:

- About Our City
- Our Home Sweet Home
- Moving about Town
- What We Heard
- Planning for the Future
- Community Work Program

These overlapping strategies addressed each section will help position Palmetto to be the premier community on the southside of the Atlanta region while remaining fiscally solvent.

The 2010 Comprehensive Plan vision statement was reaffirmed by the Stakeholder Committee, and it encapsulates the community desire to celebrate Palmetto's rural past while welcoming goods, services and amenities that come with quality economic growth.

Currently, Palmetto is best described as...

- ... a small, family-oriented historical town.
- ... a rural small town in the path of growth.
- ... a quaint small town with big town amenities.

In 20 Years, Palmetto will best be described as...

- ... a small historic town that is safe and inviting.
- ... a small town with modern conveniences and historic charm.
- ... a town you can grow with.
- ... progressive and green.
- ... inviting for families.
- ... still quaint, but larger and more pedestrian-friendly.
- ... a destination

In the future, Palmetto will lead South Fulton...

- ... by attracting new businesses and jobs.
- ... by focusing on quality growth.
- ... in quality of life and innovation.

Through data analysis and public engagement, the following issues and opportunities were identified for the City of Palmetto.

These issues are:

- Recent Growth has occurred on the outskirts of the city with limited investment within the downtown area.
- Downtown Palmetto is invisible from the I-85 Corridor
- Currently the local schools do not provide good options for families with young children compared to other school's systems in the area.
- · There is limited variety in new housing types or prices
- New development in South Fulton should be high quality.

The opportunities are:

- The ability to create a walkable downtown that reflects the character of and identity of Palmetto
- The ability to work with local elementary schools to improve opportunities for Palmetto families
- Using placemaking as a tool to build awareness of Downtown Palmetto and to show investment within the area
- Using the availability of transit service to the downtown to encourage development
- Leverage the small town feel of and areas of adequate infrastructure to attract new development to Palmetto.





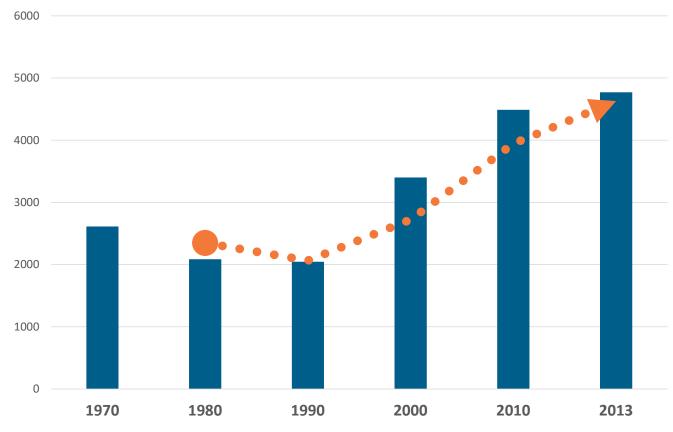
Palmetto, as we know it today, was first established as Johnson's Store in Coweta County on May 8, 1833, at which time Mr. John H. Johnson was appointed the first postmaster. The name was changed from Johnson's Store to Palmetto on December 8, 1847. The community was established in the former Campbell County sometime during the period of 1850 to 1851.

The town of Palmetto was chartered by a State Legislative Act approved on February 18, 1854. The name is said to have been conferred upon this community by a company of South Carolina Soldiers en-route to the Mexican War. They said the community reminded them of their state, the "Palmetto State". The following residents were named as the first commissioners: Willis P. Menefee, Samuel Swanser, James J. Beall, Ruben Millsapps, and John M. Edwards. The town existed as an unincorporated community for several years prior to the date of the charter. Campbell County was abolished and on January 1, 1932 Palmetto became part of Fulton County.

Palmetto is located 25 miles south of Atlanta on U.S. Highway 29 and on the current CSX railroad. The railroad was completed from Atlanta to Palmetto in 1851 and extended to West Point, Georgia two or three years later. Palmetto is located on the highest point above sea level between Atlanta and New Orleans. the railroad is built on a water shed divide. All water falling east of the railroad flows into the Flint River and all water falling west of the railroad flows into the Chattahoochee River.



Location of Palmetto within the Atlanta region

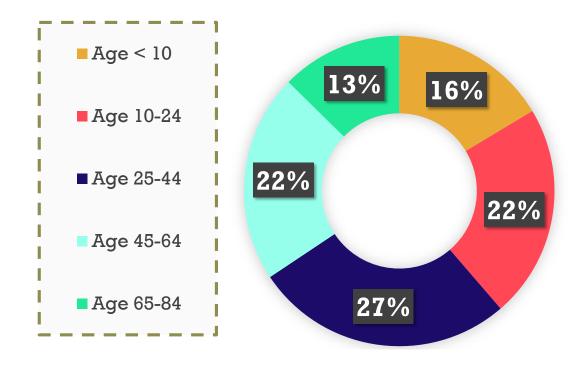


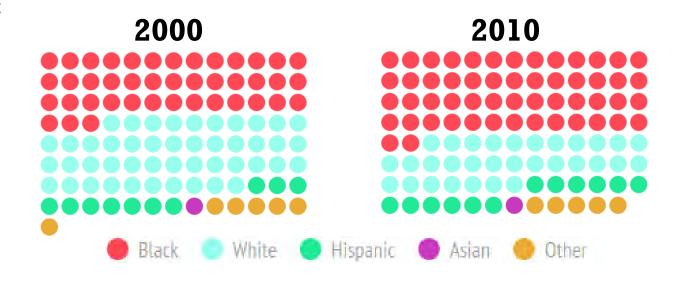
Until the 1990s the City of Palmetto was losing population, however with the growth of the Atlanta region, the city reversed that trend and had a 40% population growth between 2000 and 2013. With undeveloped land near historic downtown area, Palmetto has room to grow.

This growth has led to increasing diversity within the City of Palmetto and the number of housing units.

The largest age group in Palmetto are those aged 25-44, constituting 27% of the population. People younger than 24 years make up 38% of the population, and 49% of the population is comprised of adults aged 25-64.

The racial distribution of Palmetto has seen an decrease in the number of white residents between 2000 and 2010, with a corresponding increase in the number of Black and Hispanic residents.





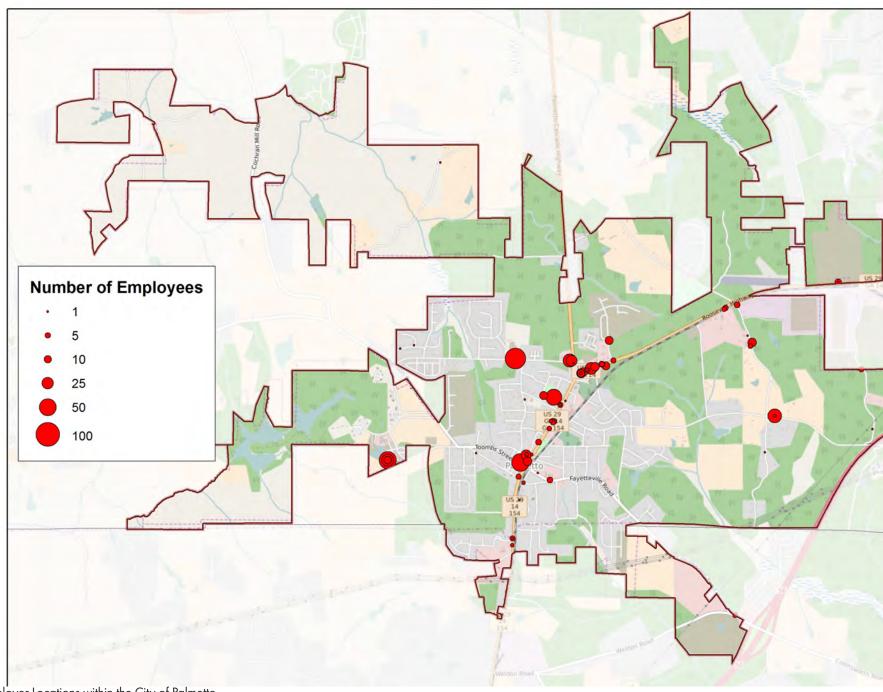
EMPLOYMENT 54% White Collar 30% Blue Collar 17% Unemployment Rate

Services

With the YourTown Community Health Center located with Palmetto, Health Care and Social Assistance is the largest job sector in Palmetto. Transportation and Warehousing jobs while low today are poised to increase with three new warehousing-distribution projects underway in the city.

The jobs of Palmetto's residents are diversified compared to jobs within the City of Palmetto. However Household income is lower than the Atlanta region, with 91% of the households making less than \$75,000 a year.



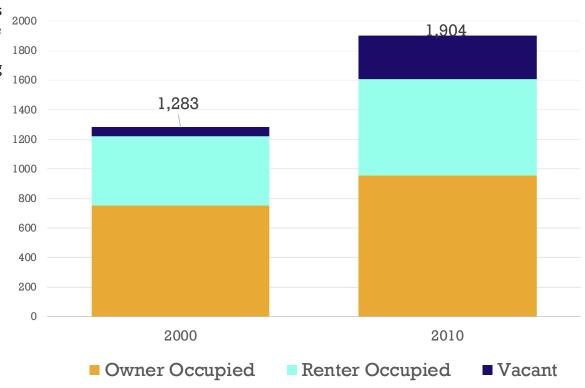


Employer Locations within the City of Palmetto



The City of Palmetto lies in Fulton and Coweta Counties. South Fulton and Coweta Counties has seen tremendous growth over the last two decades but the housing bubble and ensuing recession saw new housing development slow tremendously from 2008 to today. Similarly, housing prices dropped with the lack of new construction as credit tightened in the country. This has impacted the housing market in the City of Palmetto, however indicators point to an improving housing market within the city over the past 12 months.

Like many communities in South Fulton, Palmetto is oversupplied with a large amount of low- to mid-priced single- family housing, with limited quality multi-family or senior housing.



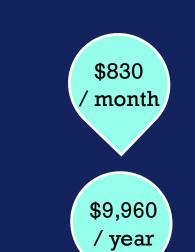




Median Monthly Owner Costs







Data Source: ESRI Business Analyst Online, Housing Expenditures

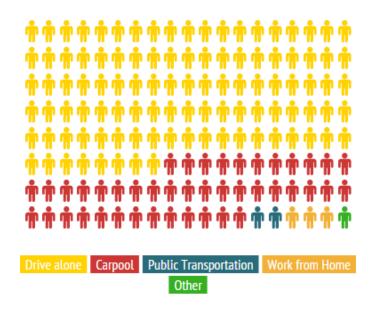


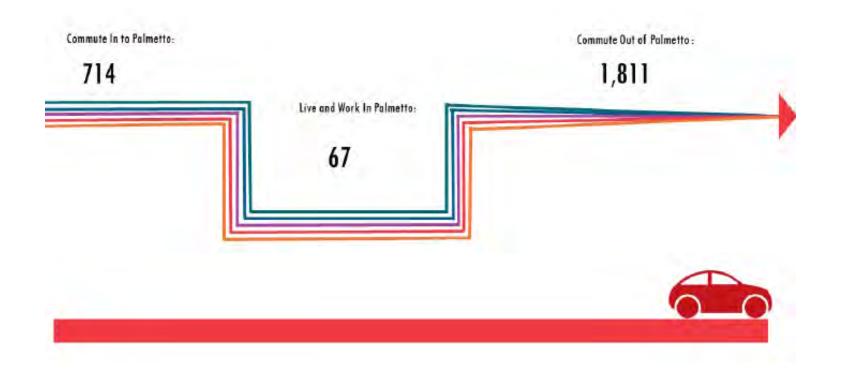


Located just north of I-85 and along US-29, the City of Palmetto is 20 miles from Hartsfield-Jackson Atlanta International Airport. These transportation connections provide residents and businesses within the city easy access to the Atlanta region and the world.

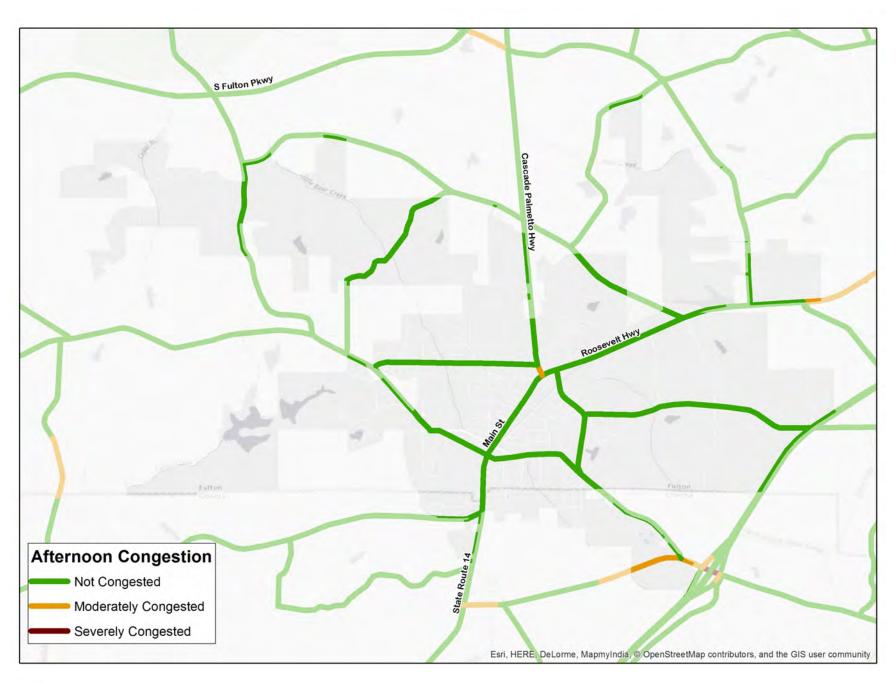
Currently only 77 people live and work in the City of Palmetto with 1,922 people leaving the city each day for work with 862 people commuting to the city. While 67% of residents drive alone each day, what is unique is 29% of residents carpool each day to their job, which is significantly higher than the regional average.

The main area of congestion with the city, is at the Collinsworth Interchange. That congestion at the interchange causes congestion along Weldon and Collinsworth Roads as they near the interchange. This area is scheduled to be improved by 2018. Other areas of congestion are along Roosevelt Highway north of Main Street.









Afternoon Congestion near the City of Palmetto



The full planning process for the update of the Palmetto Comprehensive Plan, from public engagement and data collection all the way through the production of the plan took seven months.

Public outreach involved a variety of approaches in order to get a wide range of ideas and perspectives, which in turn were incorporated into the analysis of existing conditions, recommendations, and methods of implementation for the comprehensive plan.

Steering Committee

A Steering Committee of elected officials, city staff, residents and business owners was established to get feedback on the planning process. Members attended committee meetings, weighed in on the design of the planning process to ensure maximum public input, and offered feedback on the analysis and potential strategies detailed in the plan.



These two images were the top selected images from a Image Preference Survey of Commercial Development within the Palmetto Downtown area. New development should meet aspire to be similar in design and scale.



August to September

Research and Analysis of Existing Conditions Meet with Steering Committee

First Public Meeting

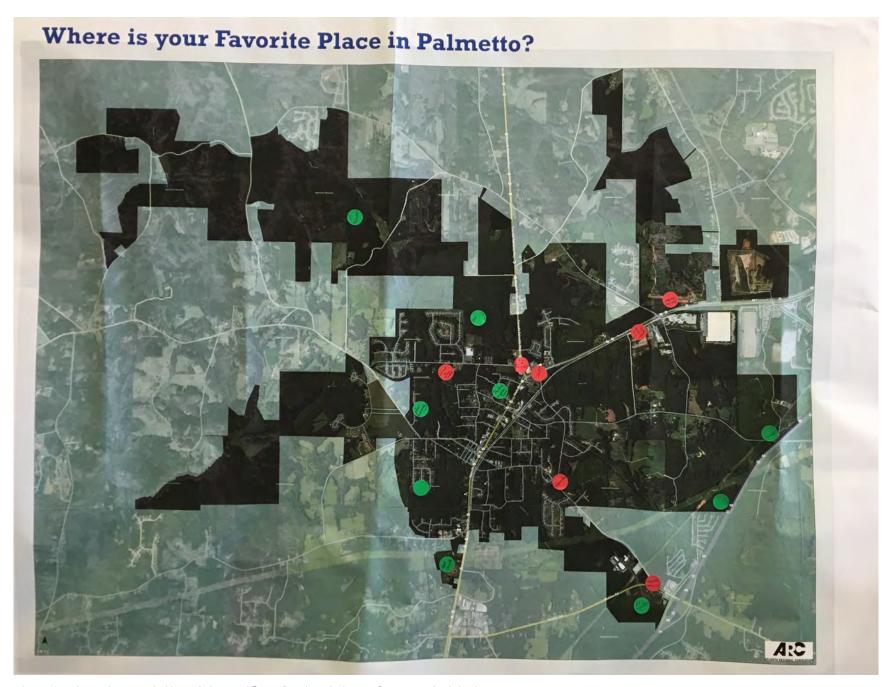
September to November

Summarize Public Meeting and Steering Committee Results

Preliminary Recommendations

November to February

Production of Final Plan



This map shows the places that people like in Palmetto (Green Dots) and places of concerns (red dots)



To implement the Community Vision of Palmetto in 20 years being:

- ... a small historic town that is safe and inviting.
- ... a small town with modern conveniences and historic charm.
- ... a town you can grow with.
- ... progressive and green.
- ... inviting for families.
- ... still quaint, but larger and more pedestrian-friendly.
- ... a destination

And how Palmetto will lead South Fulton...

- ... by attracting new businesses and jobs.
- ... by focusing on quality growth.
- ... in quality of life and innovation.

This plan represents an ambitious vision for the future of the City of Palmetto and will require the long-term cooperation of the public and private sections to come to fruition. The Community Work Program later in this chapter provides a work program on the activities that the city will undertake within the next five years to implement the plan, while the land use plan provides future guidance on the future land use within the city.



Landscaping, murals and other city beautification projects along major thoroughfares are one strategy to promote the brand of the City of Palmetto.

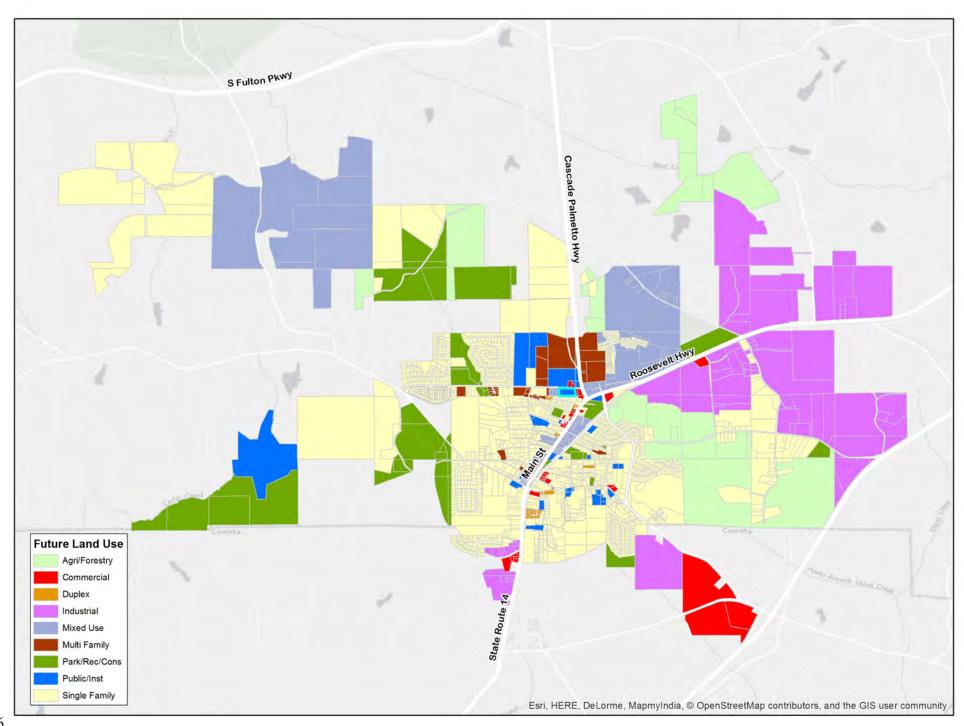




Wayfinding and Historic Signage will help promote downtown Palmetto to create a stronger sense of place.



The Future Land Use map on the next page is meant as a conceptual blueprint for future development within Palmetto, which illustrates a sensitivity to the area's rich natural and historic features, and focused around desired economic investment within the Historic Downtown area. The future land uses shown do not automatically change overlying zoning districts or regulations; rather, they are meant as a guide for city decision-making over time, based on an overall desire to improve the city's long- term quality of life and minimize the effects of sprawling development patterns



Agriculture/Forestry





Commercial





Park/Rec/Conservation





Single-Family or Duplex





Mixed Use





Public/Institutional





Multi-Family





Industrial





Agriculture/Forestry

The Agriculture and Forestry area is defined as large lot residential or land that is dedicated for farming and/or pastures. These areas may experience new development and be transitioned into other categories.

Appropriate Zoning Categories

• "RR," Rural Residential District

Commercial

This employment area is defined as land dedicated to non-industrial business uses, including retail sales, office, service and entertainment facilities, organized into general categories of intensities. Commercial uses may be located as a single use in one building or grouped together in a shopping center or office building.

Appropriate Zoning Categories

- "C-I" Neighborhood Commercial
- "C-3" General Commercial
- "C-4" General Commercial
- "C-2" Central Business District
- "PUD" Planned Unit Development

Duplex

This Residential area is defined as a detached building designed for and occupied exclusively by two families living independently of one another.

Appropriate Zoning Categories

- "R-5" Medium Density Residential
- "R-6" High Density Residential

Industrial

This employment area is for land dedicated to manufacturing facilities, processing plants, factories, warehousing and wholesale trade facilities, mining or mineral extraction activities, or other similar uses.

Appropriate Zoning Categories

- "M-I" Light Industrial
- "M-2" Heavy Industrial

Mixed Use

This area contains both residential and employment uses that are intergraded. This area is the traditional downtown of the City of Palmetto and new development areas.

Appropriate Zoning Categories

- "PUD" Planned Unit Development
- "R-3A" Traditional Residential
- "R-3B" Mill Village Residential
- "C-2" Central Business District

Multi-Family

The Residential Ara is defined as attached residential development and occupied as multiple families living independently of each other.

Appropriate Zoning Categories

• "R-6" High Density Residential

Park/Rec/Conservation

This area is defined as areas of limited growth or development. It may be used as recreation or conservation areas. Any rezoning in these areas should be carefully considered to reflect the neighboring development.

Public/Institutional

This category includes certain state, federal or local government uses, and institutional land uses. Government uses include city halls and government building complexes, police and fire stations, libraries, prisons, post offices, schools, military installations, etc. Examples of institutional land uses include colleges, churches, cemeteries, hospitals, etc.

Single-Family

This Residential area is defined as a detached building designed for and occupied exclusively by single families.

Appropriate Zoning Categories

- "R-5" Medium Density Residential
- "RR" Rural Residential
- "R-I" Low Density Residential
- "R-2" Moderate Density Residential
- "R-3A" Traditional Residential
- "R-3B" Mill Village Residential
- "PUD" Planned Unit Development

A key component of the Comprehensive Plan is to identify projects that the City of Palmetto will undertake to implement the goals of the plan. The following pages identify the projects that the City of Palmetto will undertake in the next five years as well as their Report of Accomplishments from the previous plan.

Project	Status	Comments	Responsible Party			
POPULATION CHANGE						
In order to accommodate shifts in market and population demand, revise zoning ordinance to include a regulatory framework conducive to a wide range of residential types and sizes	Complete		City			
	LAND US	E				
Rewrite zoning ordinance to include a mixed-use category, incorporate a design guidelines package, adjust minimum-allowed residential lot sizes, reevaluate open space requirements and include any zoning overlay areas	Complete		City			
Prepare a detailed subarea plan for and area approximately one-half mile from the Carlton Road / Highway 154 intersection, considering land use / development strategies to promote a walkable, mixed-use activity center complementary to the historic downtown area	Not Complete		City, GDOT			
Control potential strip commercial development along Highway 29 with an access management strategy, corridor overlay or other regulatory mechanism	Not Complete		City			
ECONO	MIC DEVEL	OPMENT				
Prepare a design guidelines package that includes recommendations for building aesthetics, single-family infill housing, landscape buffers, signage and sustainability measures	Complete		City			
Study the potential for development (small office, commercial, multifamily, mixeduse) and recruitment strategies as part of the "Downtown North" subarea plan described above	Not Complete		City			
Create a wayfinding / gateway signage program to better link I-85 to downtown (design and implementation)	Not Complete		City			
HOUSING						
Reassess development plan for Princeton Village to determine the feasibility of improving connections to the surrounding areas and diversifying the housing product	Dropped	No longer a Priority	City			
NATURAL & CULTURAL RESOURCES						
Prepare a historic properties survey and preservation strategy	Not Complete		City			
Undertake a city-wide greenway/greenspace plan to protect and enhance stream corridors while improving connectivity, especially as a key component in PATH"s planned South Fulton trail	Not Complete	Will participate in AACID Study on trails	City, PATH			

Project	Year Begin	Comments	Responsible Party			
Pursue designation of Wilkerson Mill Road and Cochran Mill Road corridors as scenic byways, and explore the feasibility of conservation easements to preserve their rural character	Compete	A part of the South Fulton Scenic Byway	City			
Formalize capital improvements program for recommended LCI projects	Not Complete	Changed to update LCI Plan	City			
COMMUNITY	FACILITII	ES & SERVICES	,			
Pursue streetscape funding for Main Street, as per LCI plan	Not Complete	Will update LCI Plan	City			
Formalize a plan for sewer extensions to potential growth areas to the south, especially along Weldon Road	Complete		City			
T R A N S P O R TAT I O N						
Pursue funding for a bicycle facility on Cobb Street, as per LCI plan	Dropped	Will update LCI Plan	City			
Improve railroad underpasses at Church and Toombs Streets	Underway	One completed also add name to Thornton	City			
Prepare a study for one-way pairs on Church and Toombs Streets	Dropped	No longer a priority	City			
Undertake a traffic planning / engineering study as part of recommended "Downtown North" subarea plan to influence GDOT improvements	Not Complete		City			
INTERGOVERNMENTAL COORDINATION						
Continue to work with South Fulton Municipal Regional Water and Sewer Authority to improve area water infrastructure	Complete- Underway	Marked as complete but is an ongoing business practice.	City, neighboring jurisdictions			

Short Term Work Program 2017-2022

Project	Year Begin	Year Complete	Rough Cost Estimate	Funding Source	Responsible Party	
LANDUSE						
Prepare a detailed subarea plan for and area approximately one-half mile from the Carlton Road / Highway 154 intersection, considering land use / development strategies to promote a walkable, mixed-use activity center complementary to the historic downtown area	2019	2020	\$40,000	LCI, GDOT, City	City, GDOT	
Control potential strip commercial development along Highway 29 with an access management strategy, corridor overlay or other regulatory mechanism	2019	2020	Can be done as part of subarea plan	City, GDOT, LCI	City	
ECONO	MIC DEVEL	OPMENT				
Study the potential for development (small office, commercial, multifamily, mixed- use) and recruitment strategies as part of the "Downtown North" subarea plan described above	2019	2020	Can be done as part of subarea plan	LCI, GDOT, City	City	
Create a wayfinding / gateway signage program to better link I-85 to downtown (design and implementation)	2018	2019	\$25,000	City	City	
NATURAL & CULTURAL RESOURCES						
Prepare a historic properties survey and preservation strategy	2018	2019	Staff Time	ARC	ARC. City	
Undertake a city-wide greenway/greenspace plan to protect and enhance stream corridors while improving connectivity, especially as a key component in PATH"s planned South Fulton trail	2017	2019	N/A	City, County, ARC	City, ARC	

SHORT- TERM WORK PROGRAM (CON' T)

Project	Year Begin	Year Complete	Rough Cost Estimate	Funding Source	Responsible Party
Update LCI Plan	2019	2020	100,000	ARC, Local Match	City
COMMUNITY FACILITIES & SERVICES					
Pursue streetscape funding for Main Street, as per LCI plan	2019	2020	Staff Time	ARC, Local Match	City
T R A N S P O R TAT I O N					
Improve railroad underpasses at Church, Toombs, and Thorton Streets	2019	2021	N/A	City, CSX, LCI	City
Undertake a traffic planning / engineering study as part of recommended "Downtown North" subarea plan to influence GDOT improvements	2019	2020	Can be done as part of subarea plan	City	City