

# **REGIONAL REVIEW FINDING**

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

DATE: February 6, 2019 ARC REVIEW CODE: R1901171

TO: Mayor Nancy Harris, City of Duluth ATTN TO: Dan Robinson, Senior Planner

FROM: Douglas R. Hooker, Executive Director, ARC RE: Development of Regional Impact (DRI) Review

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The Atlanta Regional Commission (ARC) has completed a regional review of the following Development of Regional Impact (DRI). ARC reviewed the DRI with regard to its relationship to regional plans, goals and policies – and impacts it may have on the activities, plans, goals and policies of other local jurisdictions as well as state, federal and other agencies. This final report does not address whether the DRI is or is not in the best interest of the host local government.

Name of Proposal: Encore by Ashton Woods Homes (DRI 2866)

**Submitting Local Government**: City of Duluth

**Review Type:** Development of Regional Impact Date Opened: January 17, 2019 Date Closed: February 6, 2019

<u>Description</u>: This DRI is in the City of Duluth on an approximately 145-acre site, north of Peachtree Industrial Boulevard, west of Rogers Bridge Road, north/east of Shake Rag Road, and south of the Chattahoochee River. The development plan proposes 971 residential units (395 single family detached homes, 126 townhomes and 450 apartments) and 10,000 SF of retail space. Site access is proposed via two driveways on Peachtree Industrial Boulevard. The local trigger for this DRI review is a rezoning application filed with the City of Duluth. The estimated buildout year is 2023.

<u>Comments:</u> According to the ARC Unified Growth Policy Map (UGPM), part of The Atlanta Region's Plan, this DRI is in the Developed/Established Suburbs Area of the region. Developed/Established Suburbs are areas of development that occurred from roughly 1970 to 1995 and are projected to remain suburbs through 2040. ARC's Regional Development Guide (RDG) details recommended policies for areas on the UGPM. General RDG information and recommendations for Developed/Established Suburbs are listed at the bottom of these comments.

This DRI appears to manifest certain aspects of regional policy. It incorporates parks, greenspaces and recreation facilities throughout the site. The project also enhances internal pedestrian connectivity by linking all areas of the site with a mostly off-street trail network. Finally, the DRI clusters most of its apartments and townhomes – and their attendant (typically impervious) parking lots – together, away from the Chattahoochee River and on-site streams and wetlands. This configuration can allow single family residential (pervious) back and side yards to, in a sense, supplement required stream buffers.

The project can further support The Atlanta Region's Plan by incorporating other aspects of regional policy, including green infrastructure and/or low-impact design (e.g., rain gardens, vegetated swales, etc.) in park/green spaces, parking areas and along internal roadways, and as part of any improvements to site frontages. This is of particular importance given the site's location in the Chattahoochee River Corridor and the presence of a streams and wetlands on the site. More detailed comments on water resources are attached to this report.

In addition, ARC encourages the applicant team to ensure that the development promotes a functional, safe, clearly marked and comfortable pedestrian experience on all streets, paths and parking areas on the site. While the off-street path network is a positive amenity in this regard, it should be noted that the plan contemplates sidewalks on only one side of all internal roadways. ARC staff recommends sidewalks on both sides of internal roadways. ARC also encourages the development team to flesh out additional detail for the

off-street trail network as the local review continues, specifically in terms of whether bicycles will be allowed or will be restricted to roadways.

ARC's policy guidance for Developed/Established Suburbs mentions that new development should connect to the existing road network and adjacent developments, and use of cul-de-sacs or other means resulting in disconnected subdivisions, should be discouraged. While this DRI features appropriate internal street connectivity, along with an off-street trail network, its site design does not appear to contemplate potential future connections to adjacent properties or, by extension, to any other external roadways besides Peachtree Industrial Boulevard. This is coupled with the DRI's fairly limited frontage on Peachtree Industrial that only allows for two site driveways (currently unsignalized but proposed to be signalized) to serve the entire development. These issues deserve continued consideration in relation to Duluth's vision for connectivity, mobility and safety.

Along the lines of connectivity, ARC staff encourages the City and the applicant team to collaborate on the DRI's design so as to accommodate – or at least not preclude – a future trail along the Chattahoochee River, connecting at minimum to Rogers Bridge Park to the east (upriver) and ideally to the west (downriver) as well. Design solutions exist to maintain secure, resident–only access to the development, while allowing space for a new public riverfront amenity in this area. Connecting to Rogers Bridge Park will also provide recreational users (including this DRI's residents) easy future bike/ped access to the planned (rehabilitated or replaced) Rogers Bridge. This bike/ped bridge facility is a joint capital project between Gwinnett County, Duluth and Johns Creek, and will connect across the river to the future Cauley Creek Park and Gwinnett County trail system.

The density of this DRI (6.67 units per acre) is higher than the ARC RDG's recommended development parameters for Developed/Established Suburbs (up to 5 units per acre). It also appears to be higher than what is recommended in the draft City of Duluth Comprehensive Plan Update currently under review by ARC and Georgia DCA – which notes that multifamily residential is inappropriate for this character area. It should be noted that some areas near the site are outside Duluth's jurisdiction, e.g., unincorporated Gwinnett County immediately to the west, and the City of Johns Creek across the river to the north. Therefore it will be critical for Duluth's leadership and staff, along with the development team, to collaborate to ensure maximum sensitivity to nearby local governments, neighborhoods, natural resources and land uses.

Additional ARC staff comments related to transportation and water resources, along with external comments received from contacted parties during the review period, are attached to this report. Of note are the following:

ARC Natural Resources Group comments include the key point that nearly all of the project property is within the 2,000-foot Chattahoochee River Corridor. Development within the Corridor is subject to the requirements of the Metropolitan River Protection Act (MRPA) and the Chattahoochee Corridor Plan. The project proposed in this DRI will ultimately have to be reviewed for consistency with all applicable Corridor Plan Standards before any land disturbance or construction in the Corridor can begin. These staff comments also detail best management practices (BMPs) to address stormater runoff both during and after construction.

Comments received from the National Park Service's Chattahoochee River National Recreation Area (CRNRA) – in the larger context of the site's adjacency to the Chattahoochee River – echo the need for BMPs to address erosion and sedimentation and the introduction of non–native species during construction; stormwater runoff after construction (according to project information filed by Duluth staff during this review, the site is ultimately projected to be 60% impervious surface); and the recommendation to preserve riverfront space for future trail connectivity. They also touch on recommendations to preserve river viewsheds and protect more of the existing small ponds on the property for water filtration, wildlife habitat and flood control.

GDOT Aviation group comments include the note that, while the DRI does not appear to impact any airport, an FAA Form 7460-1 must be submitted no later than 120 days prior to construction, if any construction equipment will reach 200 feet above ground or higher.

Further to the above, general regional policy recommendations for Developed/Established Suburbs include:

- New development should connect to the existing road network and adjacent developments and use of cul-de-sacs or other means resulting in disconnected subdivisions should be discouraged
- Maximize the usefulness of existing recreational facilities in addition to providing new recreational opportunities
- Eliminate vacant or under-utilized parking areas through mechanisms such as out-parceling or conversion to community open space
- Use rain gardens, vegetated swales or other enhanced water filtration design to enhance the quality of stormwater run-off
- Identify other opportunities to foster a sense of community by developing town centers, village centers or other places of centralized location

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

ARC COMMUNITY DEVELOPMENT
ARC RESEARCH & ANALYTICS
GEORGIA DEPARTMENT OF NATURAL RESOURCES
GEORGIA ENVIRONMENTAL FINANCE AUTHORITY
CITY OF BERKELEY LAKE
CITY OF PEACHTREE CORNERS
GWINNETT COUNTY

ARC Transportation Access & Mobility
ARC Aging & Independence Services
Georgia Department of Transportation
Georgia Soil & Water Conservation Commission
City of Duluth
City of Suwanee

ARC NATURAL RESOURCES
GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS
SRTA/GEORGIA REGIONAL TRANSPORTATION AUTHORITY
GEORGIA MOUNTAINS REGIONAL COMMISSION
CITY OF JOHNS CREEK
FORSYTH COUNTY

If you have any questions regarding this review, please contact Andrew Smith at (470) 378-1645 or <a href="mailto:asmith@atlantaregional.org">asmith@atlantaregional.org</a>. This finding will be published to the ARC review website located at <a href="http://atlantaregional.org/plan-reviews">http://atlantaregional.org/plan-reviews</a>.





### **Developments of Regional Impact**

**DRI Home** Tier Map **View Submissions Apply** <u>Login</u>

#### **DRI #2866**

### **DEVELOPMENT OF REGIONAL IMPACT Initial DRI Information**

This form is to be completed by the city or county government to provide basic project information that will allow the RDC to determine if the project appears to meet or exceed applicable DRI thresholds. Refer to both the Rules for the DRI Process and the DRI Tiers and Thresholds for more information.

### **Local Government Information**

Submitting Local Government: Duluth

Individual completing form: Daniel Robinson

Telephone: 7704975002

E-mail: drobinson@duluthga.net

\*Note: The local government representative completing this form is responsible for the accuracy of the information contained herein. If a project is to be located in more than one jurisdiction and, in total, the project meets or exceeds a DRI threshold, the local government in which the largest portion of the project is to be located is responsible for initiating the DRI review process.

### **Proposed Project Information**

Name of Proposed Project: Encore by Ashton Woods Homes

Location (Street Address, GPS 2705 Peachtree Industrial Boulevard - Duluth, GA 30096

Coordinates, or Legal Land Lot Description):

Brief Description of Project: Housing development consisting of single family homes, townhomes and apartments

totaling 971 units.

Development Type:			
(not selected)	Hotels	Wastewater Treatment Facilities	
Office	Mixed Use	Petroleum Storage Facilities	
Commercial	Airports	Water Supply Intakes/Reservoirs	
Wholesale & Distribution	Attractions & Recreational Facilities	Intermodal Terminals	
Hospitals and Health Care Facilities	Post-Secondary Schools	Truck Stops	
Housing	Waste Handling Facilities	Any other development types	
Industrial	Quarries, Asphalt & Cement Plants		
If other development type, describe:			
Project Size (# of units, floor area, etc.): 971 units			

Developer: Ashton Atlanta Residential, LLC d/b/a Ashton Woods Homes

Mailing Address: 3820 Mansell Road

Address 2: Ste. 300

City:Alpharetta State: GA Zip:30022

Telephone: 404-886-1466

Email: mike.busher@ashtonwoods.com

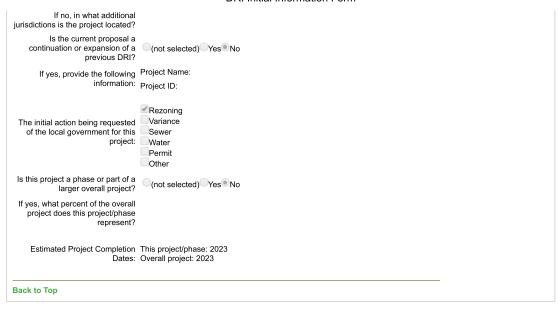
Is property owner different from (not selected) Yes No developer/applicant?

If yes, property owner: Bogopa Peachtree, LLC

Is the proposed project entirely

(not selected) Yes No located within your local

government's jurisdiction?



GRTA DRI Page | ARC DRI Page | RC Links | DCA DRI Page

**DRI Site Map | Contact** 





### **Developments of Regional Impact**

**DRI Home** 

Tier Map

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### **DRI #2866**

### **DEVELOPMENT OF REGIONAL IMPACT Additional DRI Information**

This form is to be completed by the city or county government to provide information needed by the RDC for its review of the proposed DRI. Refer to both the Rules for the DRI Process and the DRI Tiers and Thresholds for more information.

#### **Local Government Information**

Submitting Local Government: Duluth

Individual completing form: Daniel Robinson

Telephone: 7704975002

Email: drobinson@duluthga.net

### **Project Information**

Name of Proposed Project: Encore by Ashton Woods Homes

DRI ID Number: 2866

Developer/Applicant: Ashton Atlanta Residential, LLC d/b/a Ashton Woods Homes

Telephone: 404-886-1466

Email(s): mike.busher@ashtonwoods.com

### **Additional Information Requested**

Has the RDC identified any additional information required in order to proceed with the official regional

(not selected) Yes No

review process? (If no, proceed to Economic

Impacts.)

If yes, has that additional information been provided

(not selected) Yes No

to your RDC and, if applicable, GRTA?

If no, the official review process can not start until this additional information is provided.

### **Economic Development**

Estimated Value at Build-

Out:

TBD

Estimated annual local tax revenues (i.e., property tax, TRD sales tax) likely to be generated by the proposed

Is the regional work force sufficient to fill the demand created by the proposed project?

(not selected) Yes No

Will this development (not selected) Yes No displace any existing uses?

If yes, please describe (including number of units, square feet, etc): The site is currently a golf course.

### Water Supply

Name of water supply

Gwinnett County provider for this site:

```
What is the estimated water TBD supply demand to be
generated by the project,
measured in Millions of Gallons Per Day (MGD)?
Is sufficient water supply
capacity available to serve
                                  (not selected) Yes No
the proposed project?
If no, describe any plans to expand the existing water supply capacity:
Is a water line extension required to serve this
                                  (not selected) Yes No
project?
If yes, how much additional line (in miles) will be required? TBD
```

### **Wastewater Disposal**

Name of wastewater treatment provider for this Gwinnett County What is the estimated sewage flow to be TBD generated by the project, measured in Millions of Gallons Per Day (MGD)? Is sufficient wastewater treatment capacity available (not selected) Yes No to serve this proposed project? If no, describe any plans to expand existing wastewater treatment capacity: Is a sewer line extension required to serve this (not selected) Yes No project? If yes, how much additional line (in miles) will be required?TBD

### **Land Transportation**

How much traffic volume is expected to be generated by the proposed development, in peak hour TBD vehicle trips per day? (If only an alternative measure of volume is available, please provide.) Has a traffic study been performed to determine whether or not transportation or access (not selected) Yes No improvements will be needed to serve this project? Are transportation improvements needed to (not selected) Yes No serve this project?

If yes, please describe below:Intersection improvements and possible traffic light at entrance.

### **Solid Waste Disposal**

How much solid waste is the project expected to generate annually (in tons)? Is sufficient landfill capacity available to serve this (not selected) Yes No proposed project? If no, describe any plans to expand existing landfill capacity:

be generated by the (not selected) Yes No development?

If yes, please explain:

Will any hazardous waste

### **Stormwater Management**

What percentage of the site 60% is projected to be impervious surface once the

proposed development has been constructed?		
	oosed (such as buffers, detention or retention ponds, pervious parking areas) to mitigate the ater management: There will have to be onsite water quality features in addition to the s.	
Environmental Quality		
Is the development located v	vithin, or likely to affect any of the following:	
Water supply watersheds?	(not selected) Yes No	
Significant groundwater recharge areas?	(not selected) Yes No	
3. Wetlands?	(not selected) Yes No	
4. Protected mountains?	(not selected) Yes No	
5. Protected river corridors?	(not selected) Yes No	
6. Floodplains?	(not selected) Yes No	
7. Historic resources?	(not selected) Yes No	
8. Other environmentally sensitive resources?	(not selected) Yes No	
	uestion above, describe how the identified resource(s) may be affected: within the 2000 ft Chattahoochee River Corridor. There are wetlands, streams and floodplain	
Back to Top		

GRTA DRI Page | ARC DRI Page | RC Links | DCA DRI Page

DRI Site Map | Contact

### **Andrew Smith**

From: McLoyd, Johnathan G < JoMcLoyd@dot.ga.gov>

Sent: Tuesday, January 22, 2019 3:13 PM

**To:** Andrew Smith

**Cc:** Robinson, Charles A.; Peevy, Phillip M.; DeNard, Paul

**Subject:** RE: ARC DRI Review Notification - Encore by Ashton Woods Homes (DRI 2866)

### Good Afternoon Andrew,

GDOT Planning has reviewed the Encore by Ashton Woods Homes (DRI 2866) Preliminary report and show no additional GDOT projects, other than those already mentioned in the report.

For further information that may be needed concerning this review, please contact Johnathan G. McLoyd at 404-631-1774 or jomcloyd@dot.ga.gov.

# Johnathan G. McLoyd

Transportation Planner Associate



Office of Planning
One Georgia Center
600 West Peachtree Street, 5th Floor
Atlanta, GA, 30308
404.631.1774 office

From: Andrew Smith <ASmith@atlantaregional.org>

Sent: Thursday, January 17, 2019 1:33 PM

To: VanDyke, Cindy <cyvandyke@dot.ga.gov>; Fowler, Matthew <mfowler@dot.ga.gov>; Matthews, Timothy W <TMatthews@dot.ga.gov>; Garth Lynch <glynch@HNTB.com>; Wayne Mote (wmote@HNTB.com) <wmote@HNTB.com>; Peevy, Phillip M. <PPeevy@dot.ga.gov>; Robinson, Charles A. <chrobinson@dot.ga.gov>; Delgadillo Canizares, Marlene V. <mcanizares@dot.ga.gov>; McLoyd, Johnathan G <JoMcLoyd@dot.ga.gov>; Comer, Carol <ccomer@dot.ga.gov>; Hood, Alan C. <achood@dot.ga.gov>; Giles, Shane <shgiles@dot.ga.gov>; Crowe, Richard <rcrowe@dot.ga.gov>; Peevy, Jonathan <jpeevy@dot.ga.gov>; Hunter, William E. <wihunter@dot.ga.gov>; Decker, Sue Anne <sdecker@dot.ga.gov>; Zahul, Kathy <kzahul@dot.ga.gov>; Hatch, Justin A <juhatch@dot.ga.gov>; DeNard, Paul <pdenard@dot.ga.gov>; Regis, Edlin <eregis@dot.ga.gov>; Woods, Chris N. <cwoods@dot.ga.gov>; Johnson, Lankston <lajohnson@dot.ga.gov>; Boone, Eric <eboone@dot.ga.gov>; Annie Gillespie <agillespie@srta.ga.gov>; Emily Estes <eestes@srta.ga.gov>; Renaud Marshall <rmarshall@srta.ga.gov>; Parker Martin <PMartin@srta.ga.gov>; 'DRI@grta.org' <DRI@grta.org>; 'Jon West' <jon.west@dca.ga.gov>; chuck.mueller@dnr.state.ga.us; nongame.review@dnr.ga.gov; kclark@gefa.ga.gov; gaswcc.swcd@gaswcc.ga.gov; Greg Floyd (gfloyd@itsmarta.com) <gfloyd@itsmarta.com>; Kathy.Holland@gwinnettcounty.com; nancy.lovingood@gwinnettcounty.com; Brian.Johnson@gwinnettcounty.com; Jeffrey.West@gwinnettcounty.com; 'james.pugsley@gwinnettcounty.com' <james.pugsley@gwinnettcounty.com>; Tom.Sever@gwinnettcounty.com; Michael.Johnson2@gwinnettcounty.com; Alex.Hofelich@gwinnettcounty.com; alan.chapman@gwinnettcounty.com; Lewis.Cooksey@gwinnettcounty.com; Vince.Edwards@gwinnettcounty.com; 'admin@berkeley-lake.com' <admin@berkeley-lake.com'; 'admin@berkeley-lake.com'; 'admin@berkeley-lake.

### **Andrew Smith**

From: Hood, Alan C. <achood@dot.ga.gov>
Sent: Thursday, January 31, 2019 10:34 AM

**To:** Andrew Smith

Cc: Brian, Steve; Edmisten, Colette; Comer, Carol; Robinson, Joseph

**Subject:** RE: ARC DRI Review Notification - Encore by Ashton Woods Homes (DRI 2866) **Attachments:** ARC Preliminary Report - Encore by Ashton Woods Homes DRI 2866.pdf

### Andrew,

The proposed mixed-use redevelopment, consisting of approximately 971 residential units (395 single family detached homes, 126 townhomes and 450 apartments) and 10,000 SF of retail space, is in the City of Duluth on an approximately 145-acre site, north of Peachtree Industrial Boulevard, west of Rogers Bridge Road, north/east of Shake Rag Road, and south of the Chattahoochee River. It is located more than 10 miles from any civil airport and is located outside any FAA approach or departure surfaces, and airport compatible land use areas, and does not appear to impact any civil airport.

However, if any construction equipment reaches 200' above ground or higher, an FAA Form 7460-1 must be submitted to the Federal Aviation Administration. That may be done online at <a href="https://oeaaa.faa.gov">https://oeaaa.faa.gov</a>. The FAA must be in receipt of the notification, no later than 120 days prior to construction. The FAA will evaluate the potential impact of the project on protected airspace associated with the airports and advise the proponent if any action is necessary.

Thank you for the opportunity to comment on the proposed development.

### Alan Hood

Airport Safety Data Program Manager



Aviation Programs 600 West Peachtree Street NW Atlanta, GA, 30308 404.660.3394 cell

From: Andrew Smith <ASmith@atlantaregional.org>

Sent: Thursday, January 17, 2019 1:33 PM

To: VanDyke, Cindy <cyvandyke@dot.ga.gov>; Fowler, Matthew <mfowler@dot.ga.gov>; Matthews, Timothy W <TMatthews@dot.ga.gov>; Garth Lynch <glynch@HNTB.com>; Wayne Mote (wmote@HNTB.com) <wmote@HNTB.com); Peevy, Phillip M. <PPeevy@dot.ga.gov>; Robinson, Charles A. <chrobinson@dot.ga.gov>; Delgadillo Canizares, Marlene V. <mcanizares@dot.ga.gov>; McLoyd, Johnathan G <JoMcLoyd@dot.ga.gov>; Comer, Carol <ccomer@dot.ga.gov>; Hood, Alan C. <achood@dot.ga.gov>; Giles, Shane <shgiles@dot.ga.gov>; Crowe, Richard <rcrowe@dot.ga.gov>; Peevy, Jonathan <jpeevy@dot.ga.gov>; Hunter, William E. <wihunter@dot.ga.gov>; Decker, Sue Anne <sdecker@dot.ga.gov>; Zahul, Kathy <kzahul@dot.ga.gov>; Hatch, Justin A <juhatch@dot.ga.gov>; DeNard, Paul <pdeenard@dot.ga.gov>; Regis, Edlin <eregis@dot.ga.gov>; Woods, Chris N. <cwoods@dot.ga.gov>; Johnson, Lankston <lajohnson@dot.ga.gov>; Boone, Eric <eboone@dot.ga.gov>; Annie Gillespie <agillespie@srta.ga.gov>; Emily Estes <eestes@srta.ga.gov>; Renaud Marshall <rmarshall@srta.ga.gov>; Parker Martin <PMartin@srta.ga.gov>; 'DRI@grta.org' <DRI@grta.org'; 'Jon West' <jon.west@dca.ga.gov>; chuck.mueller@dnr.state.ga.us; nongame.review@dnr.ga.gov; kclark@gefa.ga.gov; gaswcc.swcd@gaswcc.ga.gov; Greg Floyd (gfloyd@itsmarta.com)



January 24, 2019

Andrew Smith
Principal Planner, Community Development Group
Atlanta Regional Commission
International Tower
229 Peachtree St. N.E., Ste. 100
Atlanta, GA 30303

Dear Mr. Smith:

Thank you for the opportunity to comment on the Encore residential development in the City of Duluth (DRI 2866).

The subject development site lies southeast of the City of Johns Creek's future Cauley Creek Park across the Chattahoochee River, and will be connected to our City by the future Rogers Bridge, a mutual capital project between Gwinnett County, the City of Duluth and the City of Johns Creek to provide pedestrian and bicyclist connections.

The proposed development is unlikely to place a significant burden on Johns Creek's transportation infrastructure. The majority of southbound traffic from the development will most likely take Peachtree Industrial Boulevard South heading towards Route 285, bypassing Johns Creek. While some northbound and westbound traffic is likely to cross into the City of Johns Creek via Abbotts Bridge Rd., the impact will be minor, as GDOT already plans to widen this road in 2021.

We also expect the development will generate pedestrian and bicyclist visitors to our future Cauley Creek Park, following the completion of Rogers Bridge.

Again, thank you for sharing the proposed development plan with us. We look forward to our continued partnership with the City of Duluth. Please feel free to contact me if you need further information concerning this review.

Sincerely,

Sharon Ebert

Director of Community Development



# 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)

January 31, 2019

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

Dear Mr. Smith,

This letter is a notification of receipt of the ARC Development of Regional Impact review for the Encore by Ashton Woods Home project (DRI 2866) on Peachtree Industrial Boulevard in the City of Duluth. This project will involve the development of 971 residential units and 10,000 SF of retail space on 145-acre site within the 2,000-foot Chattahoochee River Corridor. Once the proposed development has been constructed, the site is projected to be 60% impervious surface.

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. The NPS has a vested interest in preserving the water quality, viewshed, and the natural condition of the river corridor for the various ecological, biological, and recreational services it provides to the general public. We are concerned that a project of this magnitude adjacent to the river could cause detrimental impacts to park resources. It is with these concerns in mind that NPS offers the following comments and recommendations:

### Erosion and Sedimentation

To protect the stream and water quality during construction, 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). Construction activities have the potential to increase suspended sediments downstream of the project area. Currently, the section of the Chattahoochee River adjacent to this project is listed as impaired on the state of Georgia's 303(d) listing for not fully meeting its designated uses. Due to the proximity of this proposed project to the Chattahoochee River, we are concerned that sediment will enter the river during construction and there will be long-term impacts to water quality from an increase in impervious surface. 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 BMP's should be guaranteed. To monitor effectiveness of BMPs and maintain water quality

impacts within acceptable levels, we request water quality monitoring devices be deployed both upstream and downstream of the proposed project and that results be made available monthly, or more frequently. We recommend obtaining continuous data (e.g. 15-minute increments) for the following water quality parameters: turbidity, temperature, dissolved oxygen (DO), and pH.

### Stormwater Runoff

The issue of storm water management is of upmost concern to CRNRA, as stormwater runoff causes a significant amount of erosional damage throughout the Chattahoochee River Corridor and is a major source of nonpoint source pollution in the river. The addition of impervious surface in the form of roads, parking lots, and other facilities common of urban development contributes to the growing problem of uncontrolled storm water runoff. This results in adverse effects on hydrology and ecological functions of the Chattahoochee River and its tributaries.

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. Additionally, we request that the applicant seriously consider constructing the roads and parking facilities of pervious materials.

### Introduction of Non-native Species

It is known that construction equipment and vehicles easily transport non-native species in mud and debris on unclean equipment.

**Recommendation:** We request that all equipment be washed and cleaned of debris to prevent transport of unwanted seeds and spores. Additionally, the NPS encourages the project applicant to use native grass seed or native vegetation for stabilizing the project area following construction and landscaping upon completion of the project since non-native species are easily transported downstream and can start new colonies in the CRNRA.

### Small Ponds

Small ponds and associated fringe wetlands provide erosion and flood control, a filtering system for pollutants and sediment, and valuable wildlife habitat. The proposed project will result in four small ponds being filled.

**Recommendations:** The project should be designed to mitigate for the loss of these ponds with additional green infrastructure such as vegetated swales and other enhanced water filtration controls.

# Viewshed

The CRNRA provides a scenic river corridor with recreational opportunities in close proximity to a major metropolitan area. The proposed project could negatively impact the viewshed in the park since it is located adjacent to the river.

**Recommendations:** To provide protection of aesthetics and viewsheds in the park, the height of the buildings should be limited so they are not visible from the river. Additionally, a strict "nodisturb" buffer should be in place. The buffer should contain vertical layering of native vegetation with a mixture of trees, shrubs, and low-growing plants (grasses, wildflowers, ferns, or groundcover).

# Recreational Connectivity/Corridor

The proposed project is within the CRNRA's authorized boundary. The development of this tract could potentially restrict future recreational connectivity.

**Recommendations:** We request the project managers consider a wider river buffer that could potentially accommodate a future trail along the Chattahoochee River providing a connection between the Abbotts Bridge and Suwanee Creek Units of the CRNRA.

We appreciate your consideration of these comments and please contact Deanna Greco, Chief of Planning Resources, directly if you have any questions or concerns. She can be reached at 770-318-3229 or by email at Deanna Greco@nps.gov.

Thank you,

Superintendent

# ENCORE BY ASHTON WOODS HOMES DRI

City of Duluth Natural Resources Group Comments January 14, 2019

# Metropolitan River Protection Act and Chattahoochee Corridor Plan

Nearly all the project property is within the 2000-foot Chattahoochee River Corridor. Development within the Corridor is subject to the requirements of the Metropolitan River Protection Act and the Chattahoochee Corridor Plan. The project proposed in this DRI will have to be reviewed for consistency with all applicable Corridor Plan Standards before any land disturbance or construction in the Corridor can start. Realizing that the information submitted for the DRI does not require the same information as is needed in a River Corridor review, there are some items that should be noted and addressed before a River Corridor review is submitted:

- The 150-foot impervious surface setback should be expressed as such rather than as a 100-foot impervious setback. It is not in addition to the 50-foot buffer it overlaps that buffer and is referenced as 150 feet in the Corridor Plan.
- The property in the site plan was reviewed as two projects in 1996. The review area of one of these reviews was larger than the current project area and included Corridor land that is not shown on the site plan and is under different ownership. All Corridor land included in the original reviews must be included in this review and all land disturbance and impervious surface that has either been developed on or allocated to these other properties must be accounted for before allocations can be made to the proposed development.
- All owners of these other parcels must be notified of the review and must sign the application to acknowledge they agree to the review.

# **Watershed Protection and Stream Buffers**

The entire project property is within in the Chattahoochee River Corridor watershed and is upstream of public water supply intakes on the Chattahoochee, making it subject to the Water Supply Watershed requirements of the Part 5 Criteria of the 1989 Georgia Planning Act. However, the water supply watershed portion of the Chattahoochee River watershed in this area is a large water supply watershed (over 100 square miles), as defined under the Part 5 Criteria. For large water supply watersheds without a water supply reservoir, the only applicable Part 5 requirements are restrictions on hazardous waste handling, storage and disposal within seven miles upstream of a public water supply intake.

The USGS coverage for the project area shows no blue line streams on the project property. The site plan shows one stream near Peachtree Industrial Boulevard as well as one stream with branches in the northeast portion of the project property. The City's 50-foot County undisturbed vegetative buffer and additional 25-foot (75-foot total) impervious setback, as well as the State 25-foot State Sediment and Erosion Control buffer are shown on all these steams. Any work within the City buffers will be subject to the requirements of the City buffer ordinance. Any unmapped streams on the property that meet City ordinance criteria will be also be subject to the City's stream buffer ordinance requirements. All streams, as well as all state waters are also subject to the State Sediment and Erosion Control 25-foot buffer and its requirements.

Encore by Ashton Woods DRI January 14, 2019 Page Two

### **Stormwater/Water Quality**

The project should adequately address the impacts of the proposed development on stormwater runoff and downstream water quality. During construction, the project should conform to the relevant state and federal erosion and sedimentation control requirements. After construction, water quality will be impacted due to polluted stormwater runoff. The amount of pollutants that will be produced after construction of the proposed development are dependent on the type and intensity of the use and the impervious coverage, which will affect the design of stormwater controls for the project.

In order to address post-construction stormwater runoff quality, the project should implement stormwater management controls (structural and/or nonstructural) as found in the Georgia Stormwater Management Manual (<a href="www.georgiastormwater.com">www.georgiastormwater.com</a>) and meet the stormwater management quantity and quality criteria outlined in the Manual. Where possible, the project should utilize the stormwater better site design concepts included in the Manual.

We would also suggest the following additional measures to help reduce stormwater reduction and provide for its reuse:

- Consider using green spaces and tree planting beds as stormwater controls. These can be
  designed to provide maximum aesthetic value while also providing for water quality
  treatment and run-off reduction, potentially reducing the need for larger stormwater facilities
  and helping to minimize the negative effects of stormwater runoff on streams and water
  quality.
- Consider using pervious concrete or other pervious materials in parking areas. With the proper substrate, such materials can provide a large storage capacity, which will further help to reduce stormwater runoff. Please note that permeable paving is treated as impervious under the requirements of the Chattahoochee Corridor Plan
- Consider including rainwater capture in the project design to provide for landscape irrigation during dry periods.



regional impact + local relevance

# **Development of Regional Impact**

# **Assessment of Consistency with the Regional Transportation Plan**

### **DRI INFORMATION**

DRI Number #2866

**DRI Title** Encore by Ashton Woods

**County** Gwinnett County

City (if applicable) Duluth

Address / Location Northside of Peachtree Industrial Blvd

**Proposed Development Type:** 

145 acres mixed use development consisting of 126 townhomes, 450 apartments,

395 single family and 10000 square feet of retail

Review Process EXPEDITED

NON-EXPEDITED

# **REVIEW INFORMATION**

**Prepared by** ARC Transportation Access and Mobility Division

Staff Lead Marquitrice Mangham

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Date January 15, 2019

# TRAFFIC STUDY

**Prepared by** A & R Engineering Inc

Date January 7, 2019

# **REGIONAL TRANSPORTATION PLAN PROJECTS**

C	oid the traffic analysis incorporate all projects contained in the current version of the fiscally constrained RTP which are within the study area or along major transportation corridors connecting the study area with adjacent jurisdictions?
	YES (provide the regional plan referenced and the page number of the traffic study where relevant projects are identified)
The traffi	c analysis includes a list of programmed projects in Table 5 on page 18 and in the appendix.
	NO (provide comments below)
REGIONA	AL NETWORKS
02. W	Vill the development site be directly served by any roadways identified as Regional Thoroughfares?
	A Regional Thoroughfare is a major transportation corridor that serves multiple ways of traveling, including walking, bicycling, driving, and riding transit. It connects people and goods to important places in metropolitan Atlanta. A Regional Thoroughfare's operations should be managed through application of special traffic control strategies and suitable land development guidelines in order to maintain travel efficiency, reliability, and safety for all users. In light of the special function that Regional Thoroughfares serve in supporting cross-regional and interjurisdictional mobility and access, the network receives priority consideration for infrastructure investment in the Metro Atlanta region. Any access points between the development and a Regional Thoroughfare, combined with the development's on-site circulation patterns, must be designed with the goal of preserving the highest possible level of capacity and safety for all users of the roadway.
	_ NO
	YES (identify the roadways and existing/proposed access points)
	Site access is provided by two full movement access points on Peachtree Industrial Boulevard (SR141), a regional thoroughfare.

### 03. Will the development site be directly served by any roadways identified as Regional Truck Routes?

A Regional Truck Route is a freeway, state route or other roadway which serves as a critical link for the movement of goods to, from and within the Region by connecting airports, intermodal/multimodal facilities, distribution and warehousing centers and manufacturing clusters with the rest of the state and nation. These facilities often serve a key mobility and access function for other users as well, including drivers, bicyclists, pedestrians and transit users. A Regional Truck Route's operations should be managed through application of special traffic control strategies and suitable land development guidelines in order to maintain travel efficiency, reliability, and safety for all users. In light of the special function that Regional Truck Routes serve in supporting cross-regional and interjurisdictional mobility and access, the network receives priority consideration for infrastructure investment in the Metro Atlanta region. Any access points between the development and a Regional Truck Route, combined with the development's on-site circulation patterns, must be designed with the goal of preserving the highest possible level of capacity and safety for all users of the roadway.

	NO
$\boxtimes$	YES (identify the roadways and existing/proposed access points)
	Site access is provided by two full movement access points on Peachtree Industrial Boulevard
	(SR141), a regional thoroughfare.

# 04. If the development site is within one mile of an existing rail service, provide information on accessibility conditions.

Access between major developments and transit services provide options for people who cannot or prefer not to drive, expand economic opportunities by better connecting people and jobs, and can help reduce congestion. If a transit service is available nearby, but walking or bicycling between the development site and the nearest station is a challenge, the applicable local government(s) is encouraged to make the route a funding priority for future walking and bicycling infrastructure improvements.

$\boxtimes$	NOT APPLICABLE (nearest station more than one mile away)		
	RAIL SERVICE WITHIN ONE MILE (provide additional information below)		
	Operator / Rail Line		
	Nearest Station	Click here to enter name of operator and rail line	
	Distance*	☐ Within or adjacent to the development site (0.10 mile or less)	
		0.10 to 0.50 mile	
		0.50 to 1.00 mile	
	Walking Access*	Sidewalks and crosswalks provide sufficient connectivity	
		Sidewalk and crosswalk network is incomplete	

	<ul> <li>Not applicable (accessing the site by walking is not consistent with the type of development proposed)</li> </ul>
	Click here to provide comments.
Bicycling Access*	Dedicated paths, lanes or cycle tracks provide sufficient connectivity
	Low volume and/or low speed streets provide connectivity
	☐ Route follows high volume and/or high speed streets
	Not applicable (accessing the site by bicycling is not consistent with the type of development proposed)
Transit Connectivity	Fixed route transit agency bus service available to rail station
	Private shuttle or circulator available to rail station
	No services available to rail station
	Not applicable (accessing the site by transit is not consistent with the type of development proposed)
	Click here to provide comments.

<sup>\*</sup> Following the most direct feasible walking or bicycling route to the nearest point on the development site

# 05. If there is currently no rail transit service within one mile of the development site, is nearby rail service planned in the fiscally constrained RTP?

Access between major developments and transit services provide options for people who cannot or prefer not to drive, expand economic opportunities by better connecting people and jobs, and can help reduce traffic congestion. If a transit agency operates within the jurisdiction and expansion plans are being considered in the general vicinity of the development site, the agency should give consideration to how the site can be best served during the evaluation of alignments and station locations. Proactive negotiations with the development team and local government(s) are encouraged to determine whether right-of-way within the site should be identified and protected for potential future service. If direct service to the site is not feasible or cost effective, the transit agency and local government(s) are encouraged to ensure good walking and bicycling access accessibility is provided between the development and the future rail line. These improvements should be considered fundamental components of the overall transit expansion project, with improvements completed concurrent with or prior to the transit service being brought online.

	NOT APPLICABLE (rail service already exists)
	NOT APPLICABLE (accessing the site by transit is not consistent with the type of development proposed)
$\boxtimes$	NO (no plans exist to provide rail service in the general vicinity)
	YES (provide additional information on the timeframe of the expansion project below)
	CST planned within TIP period
	CST planned within first portion of long range period
	CST planned near end of plan horizon
Click	k here to provide comments.

06. If the development site is within one mile of fixed route bus services (including any privately operated shuttles or circulators open to the general public), provide information on walking and bicycling accessibility conditions.

Access between major developments and transit services provide options for people who cannot or prefer not to drive, expand economic opportunities by better connecting people and jobs, and can help reduce congestion. If a transit service is available nearby, but walking or bicycling between the development site and the nearest station is a challenge, the applicable local government(s) is encouraged to make the connection a funding priority for future walking and bicycling infrastructure improvements.

$\leq$	NOT APPLICABLE (neare	st bus, shuttle or circulator stop more than one mile away)	
	SERVICE WITHIN ONE MILE (provide additional information below)		
	Operator(s)	GRTA P & R Mall of GA	
	Bus Route(s)	411, 414	
	Distance*	☐ Within or adjacent to the development site (0.10 mile or less)	
		☐ 0.10 to 0.50 mile	
		0.50 to 1.00 mile	
	Walking Access*	Sidewalks and crosswalks provide sufficient connectivity	
		Sidewalk and crosswalk network is incomplete	
		Not applicable (accessing the site by walking is not consistent with the type of development proposed)	
		Click here to provide comments.	
	Bicycling Access*	Dedicated paths, lanes or cycle tracks provide sufficient connectivity	
		Route uses high volume and/or high speed streets	
		Not applicable (accessing the site by bicycling is not consistent with the type of development proposed)	
	* Fallowing the most d	iract fascible walking or hisyeling route to the pagreet point on the	

			ovides rail and/or fixed route bus service operate anywhere within evelopment site is located?
	or prefer no can help re comprehen serving the nature of to to the site of ensure good any routes	ot to drive, expand of to drive, expand of the duce traffic conges asive operations plays is the development is doing to the development is doing to the development is doing to the development is doing the duck of the duck in the duck	economic opportunities by better connecting people and jobs, and tion. If a transit agency operates within the jurisdiction and a in update is undertaken, the agency should give consideration to aluation of future routes, bus stops and transfer facilities. If the amenable to access by transit, walking or bicycling, but direct service st effective, the transit agency and local government(s) should cling access accessibility is provided between the development and adius. The applicable local government(s) is encouraged to make riority for future walking and bicycling infrastructure improvements.
	□ NO □ YES		
	Gwinnett Co	ounty Bus Transit, (	GRTA Express Bus Service
08. If the development site is within one mile of an existing multi-use path or trail, provide inform on accessibility conditions.			in one mile of an existing multi-use path or trail, provide information
	who canno and jobs, a or trail is a facilities is	nt or prefer not to d and can help reduce vailable nearby, bu a challenge, the ap	pments and walking/bicycling facilities provide options for people rive, expand economic opportunities by better connecting people traffic congestion. If connectivity with a regionally significant path t walking or bicycling between the development site and those oplicable local government(s) is encouraged to make the route a lking and bicycling infrastructure improvements.
		DDLICABLE (nagrast	path or trail more than one mile away)
	_	ovide additional inf	
		_	coadside Trail Along Peachtree Industrial Blvd
	Distanc		Within or adjacent to development site (0.10 mile or less)
		Γ	0.15 to 0.50 mile
	Walking	g Access*	Sidewalks and crosswalks provide connectivity
			Sidewalk and crosswalk network is incomplete
			Not applicable (accessing the site by walking is not consistent with the type of development proposed)
	Bicyclin	g Access*	Dedicated lanes or cycle tracks provide connectivity

Low volume and/or low speed streets provide connectivity

☐ Route uses high volume and/or high speed streets	
Not applicable (accessing the site by bicycling is not consthe type of development proposed	sistent with
* Following the most direct feasible walking or bicycling route to the nearest point of development site  OTHER TRANSPORTATION DESIGN CONSIDERATIONS	n the
09. Does the site plan provide for the construction of publicly accessible local road or drive a connections with adjacent parcels?	aisle
The ability for drivers and bus routes to move between developments without using the a arterial or collector roadway networks can save time and reduce congestion. Such oppor should be considered and proactively incorporated into development site plans whenever	tunities
YES (connections to adjacent parcels are planned as part of the development)	
YES (stub outs will make future connections possible when adjacent parcels redevelop	))
NO (the site plan precludes future connections with adjacent parcels when they redev	elop)
OTHER ( Please explain)	
Access to adjacent parcels can only come from Peachtree Industrial Boulevard. No intercoladjacent parcels is proposed.	nnectivity to
10. Does the site plan enable pedestrians and bicyclists to move between destinations within development site safely and conveniently?	n the
The ability for walkers and bicyclists to move within the site safely and conveniently reduced reliance on vehicular trips, which has congestion reduction and health benefits. Developing plans should incorporate well designed and direct sidewalk connections between all key destinations. To the extent practical, bicycle lanes or multiuse paths are encouraged for lacreage sites and where high volumes of bicyclists and pedestrians are possible.	ment site
YES (sidewalks provided on all key walking routes and both sides of roads whenever publicyclists should have no major issues navigating the street network)	ractical and
PARTIAL (some walking and bicycling facilities are provided, but connections are not comprehensive and/or direct)	
NO (walking and bicycling facilities within the site are limited or nonexistent)	
NOT APPLICABLE (the nature of the development does not lend itself to internal walking bicycling trips)	ng and
OTHER ( Please explain)	

The development proposes sidewalks internal to the site connecting pedestrians to uses within the development.

11.	Does the site plan provide the ability to construct publicly accessible bicycling and walking
	connections with adjacent parcels which may be redeveloped in the future?

The ability for walkers and bicyclists to move between developments safely and conveniently

ор	duces reliance on vehicular trips, which has congestion reduction and health benefits. Such portunities should be considered and proactively incorporated into development site plans henever possible.
$\leq$	YES (connections to adjacent parcels are planned as part of the development)
	YES (stub outs will make future connections possible when adjacent parcels redevelop)
	NO (the development site plan does not enable walking or bicycling to/from adjacent parcels)
	NO (the site plan precludes future connections with adjacent parcels when they redevelop)
	NOT APPLICABLE (adjacent parcels are not likely to develop or redevelop in the near future)

The development proposes sidewalks internal to the site connecting pedestrians to uses within the development. Sidewalk and bicycle facilities currently exist along Peachtree Industrial Blvd connecting pedestrians from the proposed development to adjacent land uses.

NOT APPLICABLE (the nature of the development or adjacent parcels does not lend itself to

interparcel walking and bicycling trips)

12. Does the site plan effectively manage truck movements and separate them, to the extent possible, from the flow of pedestrians, bicyclists and motorists both within the site and on the surrounding road network?

The ability for delivery and service vehicles to efficiently enter and exit major developments is often key to their economic success. So is the ability of visitors and customers being able to move

segregated by minimizing the number of conflict points with publicly accessible internal roadways, sidewalks, paths and other facilities.	
	YES (truck routes to serve destinations within the site are clearly delineated, provide ample space for queuing and turning around, and are separated from other users to the extent practical)
	PARTIAL (while one or more truck routes are also used by motorists and/or interface with primary walking and bicycling routes, the site plan mitigates the potential for conflict adequately)
	NO (one or more truck routes serving the site conflict directly with routes likely to be used heavily by pedestrians, bicyclists and/or motorists)
$\boxtimes$	NOT APPLICABLE (the nature of the development will not generate a wide variety of users and/or very low truck volumes, so the potential for conflict is negligible)

# **RECOMMENDATIONS**

13.	Do the transportation network recommendations outlined in the traffic study appear to be feasible from a constructability standpoint?
	UNKNOWN (additional study is necessary)
	YES (based on information made available through the review process; does not represent a thorough engineering / financial analysis)
	□ NO (see comments below)
	Click here to enter text.
14.	Is ARC aware of any issues with the development proposal which may result in it being opposed by one or more local governments, agencies or stakeholder groups?
	NO (based on information shared with ARC staff prior to or during the review process; does not reflect the outcome of an extensive stakeholder engagement process)
	☐ YES (see comments below)
	Click here to enter text.
15.	ARC offers the following additional comments for consideration by the development team and/or the applicable local government(s):
	None

