

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: AUGUST 20, 2019 **ARC REVIEW CODE**: V1908091

TO: MAYOR MIKE MASON, City of Peachtree Corners

ATTN TO: KATHERINE FRANCESCONI, STORMWATER ENGINEER, City of Peachtree Corners

FROM: Douglas R. Hooker, Executive Director, ARC

Digital signature Original on file

The Atlanta Regional Commission (ARC) has completed a 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-19-04PC 4411 East Jones Bridge Road Submitting Local Government: City of Peachtree Corners

Review Type: Metro River Date Opened: 2019–08–09 Date Closed: 2019–08–19

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.

<u>Additional Comments:</u> External comments were received from the National Park Service/Chattahoochee River National Recreation Area. Those comments are attached to the ARC Finding document.

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

ARC COMMUNITY DEVELOPMENT CHATTAHOOCHEE RIVERKEEPER CITY OF JOHNS CREEK 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 (470) 378-1645. This finding will be published to the ARC website at: http://www.atlantaregional.org/landuse.

Andrew Smith

From: Sent: To: Subject: Attachments:	Couch, Ann <ann_couch@nps.gov> Monday, August 19, 2019 12:16 PM Andrew Smith Re: [EXTERNAL] MRPA Review Notice - RC-19-04PC 4411 East Jones Bridge Road chat_technical_support@nps.gov_20190819_121636.pdf</ann_couch@nps.gov>
Hey Andrew,	
Attached are the park's comments. Please let me know if you have any questions or concerns.	
Thanks,	
Annie	
On Fri, Aug 9, 2019 at 2:55 PM Andrew Smith < <u>ASmith@atlantaregional.org</u> > wrote:	
Metropolitan River Protection Act (MRPA) Review – Request for Comments	
This e-mail serves as notice that the Atlanta Regional Commission (ARC) has begun the review of MRPA application <u>RC-19-04PC 4411 East Jones Bridge Road.</u>	
<u>Description</u> : An application for a Metropolitan River Protection Act (MRPA) Certificate for the construction of a senior residential development.	
As a nearby community or another potentially affected party, we request that you or a member of your staff review the attached document and provide any comments to ARC on or before <u>August 19, 2019</u> . A hard copy of the attached is available for inspection at ARC's offices.	
	directly to this e-mail with comments (strongly preferred) or mail a hard copy of your comments to at the bottom of this email.
For more information regarding MRPA reviews, please visit our website at www.atlantaregional.org/environment/water/mrpa-chattahoochee-corridor-protection .	
Regards,	



United States Department of the Interior

National Park Service

Chattahoochee River National Recreation Area 1978 Island Ford Parkway Sandy Springs, GA 30350



IN REPLY REFER TO: L7619 (CHAT)

August 13, 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 MRPA Review Notification RC-19-04PC 4411 East Jones Bridge Road in the City of Peachtree Corners. This project will involve the development of approximately 915 dwelling units on 91.1-acre site within the 2,000-foot Chattahoochee River Corridor. Once the proposed development has been constructed, the site is projected to be 29% impervious surface (26.6 acres).

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.

Exclude/Discourage 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.

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 adjacent to the Chattahoochee River. 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.

We appreciate your consideration of these comments and please contact Mark Kinzer, Acting Chief of Planning Resource Stewardship, directly if you have any questions or concerns. He can be reached ap 678-538-1210 or by email at Mark_Kinzer@nps.gov.

Thank you,

William L. Cox Superintendent