

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: December 27, 2019

ARC REVIEW CODE: R1912101

TO: Mayor Keisha Lance Bottoms, City of Atlanta
ATTN TO: Monique Forte, Urban Planner III, Department of City Planning
FROM: Douglas R. Hooker, Executive Director, ARC
RE: Development of Regional Impact (DRI) Review



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Original on file

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: Huber Street Ready-Mix Concrete Plant (DRI 2934)

Submitting Local Government: City of Atlanta

Review Type: DRI **Date Opened:** December 10, 2019 **Date Closed:** December 26, 2019

This review closed on Dec. 26 per the Limited Trip Generation Expedited Review process outlined in ARC's DRI Rules.

Description: This DRI is on approximately 13.5 acres in the City of Atlanta at the southern terminus of Huber Street NW, west of the CSX rail line and north of the northern terminus of Fairmont Avenue NW. The proposed project is a facility for the manufacture and distribution of ready-mix concrete, also including a truck fueling station and truck repair/maintenance shop. The project proposes improving Huber St. to create a new public street connection to Fairmont Ave. to the south. Site access is proposed via driveways on the improved/extended Huber Street. Based on the use and location within one mile of a public facility (Hemphill Reservoir/City of Atlanta Waterworks and Underwood Hills Park being two examples), the project warrants DRI review. The estimated buildout year is 2020. The local trigger action for the DRI review is a special use permit application filed with the City of Atlanta.

Comments: According to the ARC Unified Growth Policy Map (UGPM), part of The Atlanta Region's Plan, this DRI is in the Maturing Neighborhoods Area of the region. ARC's Regional Development Guide (RDG) details recommended policies for areas and places on the UGPM. General RDG information and recommendations for Maturing Neighborhoods are listed at the bottom of these comments.

The projected number of vehicle trips is below 1,000 gross daily trips, which qualified the DRI for expedited ARC and SRTA/GRTA review. Therefore a full traffic analysis ("traffic study") was not required as part of SRTA/GRTA's expedited review. However, because a significant portion of the trips will be trucks, utmost care should be taken to consider project driveway design and construction, route choice, turning movements, acceleration and deceleration lanes, and grades in the surrounding area that will be affected by heavy vehicles. In terms of routing, signage and other instruction for truck drivers should be considered to ensure compliance with any routing requirements that are developed. Broadly, ongoing coordination is strongly encouraged among the applicant team, City of Atlanta, Upper Westside Community Improvement District, GDOT as needed (the site is roughly 1.5 miles from the I-85/Howell Mill Road interchange), and other planning partners, to mitigate any potential effects from truck travel generated by the project.

The applicant team and local government should take care to review the attached comments from ARC's Natural Resources Group regarding nearby water resources and relevant requirements and best practices for mitigation of impacts from construction and plant operations. The proposed project is located on an already

mostly paved property in the Peachtree Creek watershed, which is part of the Chattahoochee River watershed and enters the river downstream of the Region's water supply intakes. The USGS coverage for the project area shows no blue line streams on or near the project property, and no streams are shown on the submitted site plan. Any unmapped streams on the property may be subject to the City of Atlanta's Stream Buffer Ordinance. Any waters of the state that may be on the property will also be subject to the State 25-foot erosion and sedimentation buffer requirements.

The project can further support The Atlanta Region's Plan in general by incorporating other aspects of regional policy, including green infrastructure and/or low-impact design best practices throughout the site in general, in parking areas, on site driveways, in stormwater detention facilities, and as part of any improvements to site frontages.

In addition, ARC encourages the applicant team to ensure that the development promotes a functional, safe, clearly marked and comfortable pedestrian experience on all proposed driveways, paths and parking areas on the site. This framework can offer the potential for safe internal site circulation for employees on foot or by another alternative mode. Along these lines, the submitted DRI site plan only shows sidewalks installed on the opposite side (west and south sides) of the improved/extended Huber Street from the main part of the proposed facility. ARC recommends that sidewalks be added on the near side (east and north sides) of the new Huber Street extension as well. ARC's understanding is that installing sidewalks on both sides of the street may be a requirement of both I-2 and BeltLine Overlay zoning, both of which apply to this site. Crosswalks across the improved/extended Huber Street should also be provided at key points to allow employees or visitors ingress and egress on foot. This recommendation is made in view of the site's proximity to MARTA Bus Route #14 and potential future transit (BeltLine or other) in the area.

The intensity of this DRI generally falls within with the ARC RDG's recommended development parameters for density and building height for Maturing Neighborhoods. In terms of land use, the project is in an existing industrial area, with adjacent and nearby industrial properties in multiple directions. The City's comprehensive plan also indicates that the DRI site is in an industrial area in terms of future land use. Given its location just north of the BeltLine corridor, this DRI site is also part of BeltLine Subarea 8, specifically the northern edge of the Elaine/Huff Station node within that Subarea. The vision documented in the Subarea 8 Plan appears to be to channel density and non-industrial development southward, toward Huff Road, while property to the north and west is part of an industrial preservation district where industrial zoning is to be retained. This DRI site is within the industrial preservation district but is just north of the boundary between the two districts.

Meanwhile, many areas near the DRI site – particularly to the south and southwest – have experienced intense redevelopment pressure in recent years, transitioning to a range of mixed-use, residential and commercial (retail, restaurant and entertainment) uses that are completely unlike this DRI. These trends highlight the reality that strong market forces, presumably in line with local government policy, continue to drive non-industrial redevelopment in this area of Atlanta. This inevitably puts potentially incompatible uses in close quarters with one another.

Strong concerns about the proposed project have been raised by some surrounding property owners via the Upper Westside Community Improvement District (CID, representing commercial property owners) and the Blandtown Neighborhood Association, representing residential property owners directly south of the site. Their comments are attached to this finding and summarized here:

- Increased heavy truck traffic on Fairmont Street, which already serves some existing industrial uses and a growing number of residences.
- Safety and visibility for turning truck traffic to and from both Huber Street to the north and Fairmont Street to the south at nearby collectors and arterials (Chattahoochee Avenue and Huff Road, respectively).
- Potential air pollution from both on-site activities and increased truck traffic
- Potential watershed impacts from the proposed new use and remnants from past industrial uses on the site.

- The existence of three other similar ready-mix concrete facilities in the same Neighborhood Planning Unit (D).
- Long-term impacts on safety and accessibility for the future Atlanta BeltLine, which calls for building the Westside Trail and future transit nearby.
- Concerns about whether the DRI's application for a Special Use Permit (SUP) adequately addresses the above issues and others.

City leadership and staff will have to weigh this information carefully as the local review continues forward. It will be critical for the applicant team, City leadership and staff, and other relevant planning partners, to collaborate to the greatest extent possible to ensure maximum sensitivity and mitigate potential impacts to nearby land uses, neighborhoods, natural resources, transportation mobility and access, and other issues.

Further to the above, Maturing Neighborhoods were primarily developed prior to 1970. These areas are typically adjacent to the Region Core and Regional Employment Corridors. These three areas, combined, represent a significant percentage of the region's jobs and population. General policy recommendations for Maturing Neighborhoods include:

- Improve safety and quality of transit options by providing alternatives for end-of-trip facilities (such as bicycle racks) and sidewalks and/ or shelters adjacent to bus stops
- Identify and remedy incidents of "food deserts" within neighborhoods, particularly in traditionally underserved neighborhoods and schools
- Promote mixed use where locally appropriate, specifically in areas served by existing or planned transit
- Develop policies and establish design standards to ensure new and infill development is compatible with existing neighborhoods

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
ATLANTA BELTLINE INC.

ARC TRANSPORTATION ACCESS & MOBILITY
ARC AGING & INDEPENDENCE SERVICES
GEORGIA DEPARTMENT OF TRANSPORTATION
GEORGIA SOIL AND WATER CONSERVATION COMMISSION
UPPER WESTSIDE CID

ARC NATURAL RESOURCES
GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS
SRTA/GEORGIA REGIONAL TRANSPORTATION AUTHORITY
METROPOLITAN ATLANTA RAPID TRANSIT AUTHORITY
CITY OF ATLANTA

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



Developments of Regional Impact

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DRI #2934

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: Atlanta

Individual completing form: Monique Forte

Telephone: 404-546-0196

E-mail: mbforte@atlantaga.gov

*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: Huber Street Ready-Mix Concrete Plant

Location (Street Address, GPS Coordinates, or Legal Land Lot Description): 1521 Huber Street

Brief Description of Project: Ready-mix concrete plant, for the manufacture and distribution of ready-mix concrete.

Development Type:

- | | | |
|--|---|---|
| <input type="radio"/> (not selected) | <input type="radio"/> Hotels | <input type="radio"/> Wastewater Treatment Facilities |
| <input type="radio"/> Office | <input type="radio"/> Mixed Use | <input type="radio"/> Petroleum Storage Facilities |
| <input type="radio"/> Commercial | <input type="radio"/> Airports | <input type="radio"/> Water Supply Intakes/Reservoirs |
| <input type="radio"/> Wholesale & Distribution | <input type="radio"/> Attractions & Recreational Facilities | <input type="radio"/> Intermodal Terminals |
| <input type="radio"/> Hospitals and Health Care Facilities | <input type="radio"/> Post-Secondary Schools | <input type="radio"/> Truck Stops |
| <input type="radio"/> Housing | <input type="radio"/> Waste Handling Facilities | <input type="radio"/> Any other development types |
| <input checked="" type="radio"/> Industrial | <input type="radio"/> Quarries, Asphalt & Cement Plants | |

If other development type, describe:

Project Size (# of units, floor area, etc.): 13.5 acre site

Developer: SRM Concrete c/o G. Douglas Dillard

Mailing Address: 1776 Peachtree Street

Address 2: Suite 322S

City: Atlanta State: Ge Zip: 30309

Telephone: 678-705-1084

Email: ddillard@dillardsellers.com

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

If yes, property owner: 1521 Huber Street LLC

Is the proposed project entirely located within your local government's jurisdiction? ☐ (not selected) ☒ Yes ☐ No

If no, in what additional jurisdictions is the project located?

Is the current proposal a continuation or expansion of a previous DRI? ☐ (not selected) ☐ Yes ☒ No

If yes, provide the following information: Project Name:
Project ID:

The initial action being requested of the local government for this project: ☐ Rezoning
☐ Variance
☐ Sewer
☐ Water
☐ Permit
☒ Other Special Use Permit

Is this project a phase or part of a larger overall project? ☐ (not selected) ☐ Yes ☒ No

If yes, what percent of the overall project does this project/phase represent?

Estimated Project Completion: This project/phase: One Phase
Dates: Overall project: 12-18 months following SUP approval

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Developments of Regional Impact

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DRI #2934

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: Atlanta
Individual completing form: Monique Forte
Telephone: 404-546-0196
Email: mbforte@atlantaga.gov

Project Information

Name of Proposed Project: Huber Street Ready-Mix Concrete Plant
DRI ID Number: 2934
Developer/Applicant: SRM Concrete c/o G. Douglas Dillard
Telephone: 678-705-1084
Email(s): ddillard@dillardsellers.com

Additional Information Requested

Has the RDC identified any additional information required in order to proceed with the official regional review process? (If no, proceed to Economic Impacts.)
☐ (not selected) ☒ Yes ☐ No

If yes, has that additional information been provided to your RDC and, if applicable, GRTA?
☒ (not selected) ☐ Yes ☐ No

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

Economic Development

Estimated Value at Build-Out: \$5 Million

Estimated annual local tax revenues (i.e., property tax, sales tax) likely to be generated by the proposed development: \$25-30 million gross sales per year (approximately \$400K in local tax, \$1.2 million state tax plus additional county taxes and local property taxes)

Is the regional work force sufficient to fill the demand created by the proposed project?
☐ (not selected) ☒ Yes ☐ No

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

If yes, please describe (including number of units, square feet, etc): 13.5 acres of tractor-trailer storage

Water Supply

Name of water supply provider for this site: City of Atlanta plus attempted well-water site

What is the estimated water supply demand to be generated by the project, measured in Millions of Gallons Per Day (MGD)? 8-10 million gallons/year (3 million from City of Atlanta water)

Is sufficient water supply capacity available to serve the proposed project?
☐ (not selected) ☒ Yes ☐ No

If no, describe any plans to expand the existing water supply capacity:

Is a water line extension required to serve this project? ☐ (not selected) ☒ Yes ☐ No

If yes, how much additional line (in miles) will be required?

Wastewater Disposal

Name of wastewater treatment provider for this site: City of Atlanta

What is the estimated sewage flow to be generated by the project, measured in Millions of Gallons Per Day (MGD)? <0.1 MGD

Is sufficient wastewater treatment capacity available to serve this proposed project? ☐ (not selected) ☒ Yes ☐ No

If no, describe any plans to expand existing wastewater treatment capacity:

Is a sewer line extension required to serve this project? ☐ (not selected) ☒ Yes ☐ No

If yes, how much additional line (in miles) will be required?

Land Transportation

How much traffic volume is expected to be generated by the proposed development, in peak hour vehicle trips per day? (If only an alternative measure of volume is available, please provide.) AM Peak - 28 trucks, 5 cars; PM Peak- 27 trucks, 5 cars

Has a traffic study been performed to determine whether or not transportation or access improvements will be needed to serve this project? ☐ (not selected) ☒ Yes ☐ No

Are transportation improvements needed to serve this project? ☐ (not selected) ☒ Yes ☐ No

If yes, please describe below:

Solid Waste Disposal

How much solid waste is the project expected to generate annually (in tons)? <1 ton

Is sufficient landfill capacity available to serve this proposed project? ☐ (not selected) ☒ Yes ☐ No

If no, describe any plans to expand existing landfill capacity:

Will any hazardous waste be generated by the development? ☐ (not selected) ☒ Yes ☐ No

If yes, please explain:

Stormwater Management

What percentage of the site is projected to be impervious surface once the proposed development has been constructed? approximately 70% (minimal stormwater discharge due to water recycling program and detention pond system)

Describe any measures proposed (such as buffers, detention or retention ponds, pervious parking areas) to mitigate the project's impacts on stormwater management: The project will incorporate multiple stormwater management ponds, as well as landscape/tree buffering and tree preservation/replacement areas, along the southern boundary of the property to manage and mitigate the project's impact on stormwater management. In addition, because of the property presently has many areas of the impervious surface without proper drainage management, the project will enhance the property's level of stormwater management.

Environmental Quality

Is the development located within, or likely to affect any of the following:

1. Water supply watersheds?	<input type="radio"/> (not selected) <input type="radio"/> Yes <input type="radio"/> No
2. Significant groundwater recharge areas?	<input type="radio"/> (not selected) <input type="radio"/> Yes <input type="radio"/> No
3. Wetlands?	<input type="radio"/> (not selected) <input type="radio"/> Yes <input type="radio"/> No
4. Protected mountains?	<input type="radio"/> (not selected) <input type="radio"/> Yes <input type="radio"/> No
5. Protected river corridors?	<input type="radio"/> (not selected) <input type="radio"/> Yes <input type="radio"/> No
6. Floodplains?	<input type="radio"/> (not selected) <input type="radio"/> Yes <input type="radio"/> No
7. Historic resources?	<input type="radio"/> (not selected) <input type="radio"/> Yes <input type="radio"/> No
8. Other environmentally sensitive resources?	<input type="radio"/> (not selected) <input type="radio"/> Yes <input type="radio"/> No

If you answered yes to any question above, describe how the identified resource(s) may be affected:

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Greg Giuffrida

From: Andrew Smith
Sent: Wednesday, December 11, 2019 9:32 AM
To: Greg Giuffrida
Subject: FW: ARC DRI Review Notification - Huber Street Ready-Mix Concrete Plant (DRI #2934)
Attachments: ARC Preliminary Report - Huber Street Ready-Mix Concrete Plant - DRI 2934.pdf

From: Hood, Alan C. <achood@dot.ga.gov>
Sent: Wednesday, December 11, 2019 9:16 AM
To: Andrew Smith <ASmith@atlantaregional.org>
Cc: Brian, Steve <sbrian@dot.ga.gov>; Comer, Carol <ccomer@dot.ga.gov>; Edmisten, Colette <CEdmisten@dot.ga.gov>; Kleine, Tracie <TKleine@dot.ga.gov>; Robinson, Joseph <JoRobinson@dot.ga.gov>; Timothy.Beggerly@fultoncountyga.gov
Subject: RE: ARC DRI Review Notification - Huber Street Ready-Mix Concrete Plant (DRI #2934)

Andrew,

The proposed ready-mix concrete plant and associated truck fueling station and truck repair/maintenance shop, is on approximately 13.5 acres in the City of Atlanta at the southern terminus of Huber Street NW, west of the CSX rail line and north of the northern terminus of Fairmont Avenue NW. It is located 5.2 miles east of the Fulton County Airport – Brown Field (FTY), and is located outside any FAA approach or departure surfaces, and airport compatible land use areas, and does not appear to impact the airport.

However, the proposed structure is also in proximity to a navigation facility and may impact the assurance of navigation signal reception, so an FAA Form 7460-1 must be submitted to the Federal Aviation Administration according to the FAA's Notice Criteria Tool found here (<https://oeaaa.faa.gov/oeaaa/external/gisTools/gisAction.jsp?action=showNoNoticeRequiredToolForm>). Those submissions may be done online at <https://oeaaa.faa.gov>. The FAA must be in receipt of the notifications, no later than 120 days prior to construction. The FAA will evaluate the potential impacts of the project on protected airspace associated with the airports and advise the proponent if any action is necessary.

I have copied Tim Beggerly with the Fulton County Airport – Brown Field (FTY) on this email.

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

6th Floor

Atlanta, GA, 30308

404.660.3394 cell

404.532.0082 office

Andrew Smith

From: Greg Giuffrida
Sent: Thursday, December 26, 2019 3:20 PM
To: Elizabeth Hollister
Cc: Adeline Collot; Andrew Smith
Subject: RE: Letter from CID related to Concrete Plant SUP

Thanks, Elizabeth. Confirming we received this, along with the April 2019 letter from Blandtown Neighborhood Association. They will be included in the Review Finding package when it goes out this evening or tomorrow morning.

Thanks,

Greg Giuffrida

Plan Review Technician, Community Development
Atlanta Regional Commission
P | 470.378.1531
ggiuffrida@atlantaregional.org
atlantaregional.org
International Tower
229 Peachtree Street NE | Suite 100
Atlanta, Georgia 30303

From: Elizabeth Hollister <elizabeth@upperwestsideatl.org>
Sent: Thursday, December 26, 2019 2:56 PM
To: Greg Giuffrida <GGiuffrida@atlantaregional.org>
Cc: Adeline Collot <adeline@upperwestsideatl.org>
Subject: Letter from CID related to Concrete Plant SUP

Greg,
This is our CID's letter to the city staff prior to the ZRB meeting in March. Please feel free to include part of all of it in the DRI.
Best,
Elizabeth

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ELIZABETH HOLLISTER | Executive Director
upper westside improvement district
404 | 444 8424



March 4, 2019

Ms. Keyetta M. Holmes, AICP, Interim Director
Ms. Lenise Lyons, AICP, Planner
City of Atlanta
Office of Zoning and Development
55 Trinity Ave SW, Ste. 3350
Atlanta, GA 30303

RE: **Special Use Permit (SUP) Application: #U-18-043, 1521 Huber Street NW**
Proposed Use: Concrete plant (ready-mix concrete plant)
Applicant: RHB, LLC c/o Douglas Dillard

Dear Ms. Holmes and Ms. Lyons,

The Upper Westside Community Improvement District (CID) submits this letter of objection to Special Use Permit Application #U-18-043 for a ready-mix concrete plant at 1521 Huber Street NW on the basis that the applicant's submission is both insufficient and incomplete.

The Upper Westside CID is a non-profit organization established as a public-private partnership to enhance area mobility, connectivity, safety, and sense of place. The CID represents the district's commercial property owners and supports neighborhood partners for continued revitalization and transformation of the district into a more attractive and livable mixed-use community.

ISSUES ADDRESSED IN THIS OBJECTION:

1) The application is inconsistent with formally adopted area plans and studies:

The Upper Westside Livable Centers Initiative (LCI)

The 2005 plan calls for continued residential development in Blandtown and calls for "low impact" businesses (page 102). It notes concern around the growth of heavy industry and their potential impacts on the balance of housing, retail, businesses, and office (page 19).

The Atlanta BeltLine Master Plan, Subarea 8 Upper Westside-Northside

The 2012 plan calls for the BeltLine trail, transit, and linear park to span Fairmont Avenue south of the proposed ready-mix concrete plant. Proximity of the proposed facility, along with the anticipated volume of concrete trucks to/from the plant puts plan recommendations for Subarea 8 at risk, along with the introduction of public safety conflicts with future users of the BeltLine in this area.

Furthermore, the proposed use is inconsistent with the land use recommendations of the Atlanta BeltLine Subarea 8 and the Upper Westside LCI plans.

2) The application is incompatible with community goals and growth trends:

As host to three (3) existing cement and ready-mix concrete facilities (Thomas Concrete, Ready Mix Concrete and Standard Concrete Products), NPU-D already accommodates more than its fair share of



this use to support Atlanta's physical growth and development. This additional facility has the potential to disrupt the community's continued revitalization and economic development. The project will directly impact the value and viability of over one thousand existing and proposed residential units in direct proximity to the proposed site. This includes a mix of residential properties (apartments, condos, townhomes and single-family homes) along Ellsworth Industrial Boulevard, Huff Road, and Fairmont Avenue.

Additionally, NPU-D leadership has expressed concerns regarding the potential environmental impacts of the proposed use. Upon review of peer facilities, the community anticipates the following:

- Particulate matter emissions originating from both the facility and associated trucks (primarily composed of cement dust, a key ingredient in production of concrete);
- Stormwater contamination resulting from concrete washout, slurry, loss, and spill;
- Street and roadway deterioration and maintenance effects, including depressed potholes and "reverse potholes" caused by the loss of concrete from mixing trucks that hardens on the surface roads used for ingress and egress;
- Freight traffic to/from the plant daily (estimated at 75+ trips daily); and
- Noise pollution originating from facility operations and onsite trucks.

3) The application package is insufficient and incomplete:

The CID has specific concerns about the application package accepted December 20, 2018. The application does not adequately address access, transitional yards and buffers, overall site operations and accommodations, specifically:

- ***Traffic Study is incomplete.***
The applicant has not addressed traffic along Huff Road, Howell Mill Road, or Marietta Boulevard, all of which are near the site. The applicant proposes to use Fairmont Avenue as part of truck operations. Fairmont Avenue between the proposed facility and Huff Road crosses the Atlanta BeltLine and is transforming into a mixed-use predominately residential street. The traffic study is silent regarding impacts at critical intersections: Huff Road at Fairmont Avenue and Chattahoochee Avenue at both Howell Mill Road and Marietta Boulevard.
- ***Proposed facility is not located on a designated freight route.***
The Traffic Study incorrectly states that all roads in the study network are designated as official truck routes by the City of Atlanta (page 15). The proposed facility touches Huber Street, Fairmont Avenue, and Old Chattahoochee Avenue. None of these streets are identified on the City of Atlanta Freight Route Map per the Cargo Atlanta Plan of 2015. Note, two existing concrete facilities (as noted previously) are more properly sited on Marietta Boulevard, an officially designated freight route.
- ***Proposed site plan is inconsistent with Atlanta BeltLine Overlay District Zoning criteria:***
This inadequacy appears to include, but is not limited to, the following sections of Sec. 16-36 of Atlanta Zoning code:
 - .011(1) - street connectivity and characteristics
 - .011(5) - drive-in & thru facility limitations
 - .012 - sidewalks
 - .013(4) - fence prohibitions



- .014(5,6) - wall prohibitions
- .014(7) - fenestration
- .016(1) - loading screening
- .017(2) - driveway orientation and characteristics

These listed regulations include key tenets in the Beltline Overlay which if violated would permanently destroy the opportunity to implement the Beltline in the Northwest Atlanta. To quote from the stated intent in 06-O-2496, the Beltline should ‘revitalize certain areas of the City dominated by an underutilized industrial landscape and become a unique and innovative solution to the City’s scattered pattern of growth by providing a connected network of parks, green spaces, trails and pedestrian-friendly streetscapes’

Moreover, Sec. 16-36.002 states:

The BeltLine represents a unique opportunity: to enhance the quality of life in the City; preserve and revitalize existing neighborhoods; make greater mixed-use development feasible; strategically introduce or increase density and optimize resources in select locations; increase the affordable housing inventory; promote air quality; reduce auto dependency; and concurrently advance economic development through an increased tax base.

The City finds that taking special consideration to ensure that the redevelopment of properties adjacent to and within walking distance of the BeltLine Corridor entails a compatible mixture of residential, commercial, cultural and recreational uses, and design standards conceptualized in the BeltLine Redevelopment Plan is crucial to promote and ensure the public health, safety and welfare of its citizens. The City recognizes that as the BeltLine attracts new development, the orientation and character of that growth should encourage pedestrian and transit-oriented uses and activities designed to support an urban character to foster the most positive impact on affected communities.

This proposed use is the antithesis of fostering the most positive impact on affected communities.

While we recognize ready-mix concrete plants are necessary to support a thriving and growing city, NPU-D already has a disproportionate number of them, and the concrete plant use on this site is incompatible with the adjacent community. The proximity of the Atlanta BeltLine and a growing inventory of residential uses makes accommodating and mitigating site operations infeasible. Furthermore, access is challenged by the fact that the Huber St site is located multiple blocks away from any City designated Freight Route. These issues are compounded in that plans are inconsistent with the intent of City adopted plans and the regulatory details of BeltLine Overlay District Zoning.

The Upper Westside CID recommends denial of the Special Use Permit. However, if the city concludes that the permit must be granted, we encourage you to defer the application until the applicant corrects and amends the supporting Traffic Study and then adopt sufficient enforceable conditions to ensure that traffic safety issues are addressed, the site plan adheres to both the intent and letter of the BeltLine Overlay District Zoning, and the applicant adequately mitigates operational aspects, including all environmental issues.

Sincerely,

Elizabeth Hollister
Executive Director, Upper Westside Improvement District
elizabeth@upperwestsideatl.org
678-827-9990

HUBER STREET READY-MIX DRI
City of Atlanta
Natural Resources Group Review Comments
December 6, 2019

Watershed Protection and Stream Buffers

The proposed project is located on an already mostly paved property in the Peachtree Creek watershed, which is part of the Chattahoochee River watershed and enters the river downstream of the Region's water intakes. The USGS coverage for the project area shows no blue line streams on or near the project property, and no streams are shown on the submitted site plan. Any unmapped streams on the property may be subject to the City of Atlanta's Stream Buffer Ordinance. Any waters of the state that may be on the property will also be subject to the State 25-foot erosion and sedimentation buffer requirements.

Stormwater / Water Quality

During construction, the project should conform to the relevant state and federal erosion and sedimentation control requirements. After construction, if new or upgraded on-site detention is required, the design should include the relevant stormwater management controls (structural and/or nonstructural) in the Georgia Stormwater Management Manual (www.georgiastormwater.com). Where possible, the project should utilize the stormwater better site design concepts included in the Manual.

In addition to standard measures, we suggest the following additional measures to help reduce stormwater runoff and provide for its reuse before returning it to the stream system:

- 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.
- Including rainwater capture in the project design to provide for landscape irrigation during dry periods.

Development of Regional Impact Assessment of Consistency with the Regional Transportation Plan

DRI INFORMATION

DRI Number #2934
DRI Title Huber Street Ready Mix Concrete Plant
County Fulton County
City (if applicable) City of Atlanta
Address / Location 1521 Huber street NW, Atlanta, GA 30318

Proposed Development Type:

13.5 acre Industrial site for a ready Mix Concrete plant

Review Process ☒ EXPEDITED
☐ NON-EXPEDITED

REVIEW INFORMATION

Prepared by ARC Transportation Access and Mobility Division
Staff Lead Marquitrice Mangham
Copied [Click here to enter text.](#)
Date December 6, 2019

TRAFFIC STUDY

Prepared by A & R Engineering
Date 12/3/2019

REGIONAL TRANSPORTATION PLAN PROJECTS

- 01. Did 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 project is proposing less than 1000 trips generated per day which constitutes an expedited review. A full traffic analysis is not required as a part of the expedited review.

☐ NO (*provide comments below*)

REGIONAL NETWORKS

- 02. Will 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 Huber Street, a local road).

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

☐ YES (*identify the roadways and existing/proposed access points*)

Site access is provided by Huber Street.

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.

☒ 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

☐ 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
- ☐ 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.](#)

* 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*)
- ☐ 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 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.

☐ NOT APPLICABLE (nearest bus, shuttle or circulator stop more than one mile away)

☒ SERVICE WITHIN ONE MILE (provide additional information below)

Operator(s) MARTA

Bus Route(s) 14

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

☒ Low volume and/or low speed streets 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)

* Following the most direct feasible walking or bicycling route to the nearest point on the development site

07. 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.

☐ NOT APPLICABLE (nearest bus, shuttle or circulator stop more than one mile away)

☒ SERVICE WITHIN ONE MILE (provide additional information below)

Operator(s) [Click here to enter name of operator\(s\).](#)

Bus Route(s) [Click here to enter bus route number\(s\).](#)

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

☒ Low volume and/or low speed streets 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)

* Following the most direct feasible walking or bicycling route to the nearest point on the development site

08. Does a transit agency which provides rail and/or fixed route bus service operate anywhere within the jurisdiction in which the development site is located?

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 a comprehensive operations plan update is undertaken, the agency should give consideration to serving the site during the evaluation of future routes, bus stops and transfer facilities. If the nature of the development is amenable to access by transit, walking or bicycling, but direct service to the site is not feasible or cost effective, the transit agency and local government(s) should ensure good walking and bicycling access accessibility is provided between the development and any routes within a one mile radius. The applicable local government(s) is encouraged to make these connections a funding priority for future walking and bicycling infrastructure improvements.

☐ NO

☒ YES

09. If the development site is within one mile of an existing multi-use path or trail, provide information on accessibility conditions.

Access between major developments and walking/bicycling facilities 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 connectivity with a regionally significant path or trail is available nearby, but walking or bicycling between the development site and those facilities is a challenge, the applicable local government(s) is encouraged to make the route a funding priority for future walking and bicycling infrastructure improvements.

☒ NOT APPLICABLE (nearest path or trail more than one mile away)

☐ YES (provide additional information below)

Name of facility

[Click here to provide name of facility.](#)

Distance

☐ Within or adjacent to development site (0.10 mile or less)

☐ 0.15 to 0.50 mile

☐ 0.50 to 1.00 mile

Walking 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)

Bicycling 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 consistent with the type of development proposed)

- * Following the most direct feasible walking or bicycling route to the nearest point on the development site

OTHER TRANSPORTATION DESIGN CONSIDERATIONS

10. Does the site plan provide for the construction of publicly accessible local road or drive aisle connections with adjacent parcels?

The ability for drivers and bus routes to move between developments without using the adjacent arterial or collector roadway networks can save time and reduce congestion. Such opportunities should be considered and proactively incorporated into development site plans whenever possible.

- ☒ 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 redevelop)
- ☐ OTHER (Please explain)

11. Does the site plan enable pedestrians and bicyclists to move between destinations within the development site safely and conveniently?

The ability for walkers and bicyclists to move within the site safely and conveniently reduces reliance on vehicular trips, which has congestion reduction and health benefits. Development site 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 large acreage sites and where high volumes of bicyclists and pedestrians are possible.

- ☐ YES (sidewalks provided on all key walking routes and both sides of roads whenever practical and bicyclists should have no major issues navigating the street network)
- ☐ 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 and bicycling trips)
- ☐ OTHER (Please explain)

[Click here to provide comments.](#)

12. 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 reduces reliance on vehicular trips, which has congestion reduction and health benefits. Such opportunities should be considered and proactively incorporated into development site plans whenever possible.

- ☐ 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)
- ☒ NOT APPLICABLE (the nature of the development or adjacent parcels does not lend itself to interparcel walking and bicycling trips)

13. 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 around safely and pleasantly within the site. To the extent practical, truck movements should be 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)
- ☐ 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)

Although vehicle traffic is expected to be very low, vehicles appear to share common drive access with trucks entering and exiting the site.

RECOMMENDATIONS

14. 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.

15. 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.

16. ARC offers the following additional comments for consideration by the development team and/or the applicable local government(s):

None



A&R Engineering Inc.

2160 Kingston Court, Suite O
Marietta, GA 30067
Tel: (770) 690-9255 Fax: (770) 690-9210
www.areng.com



Memorandum

To: Georgia Regional Transportation Authority (GRTA)
CC: Atlanta Regional Commission (ARC)
Georgia Department of Transportation (GDOT)
City of Atlanta
Date: December 3, 2019
Subject: Expedited Review for DRI 2934 Huber Street Ready-Mix Concrete Plant

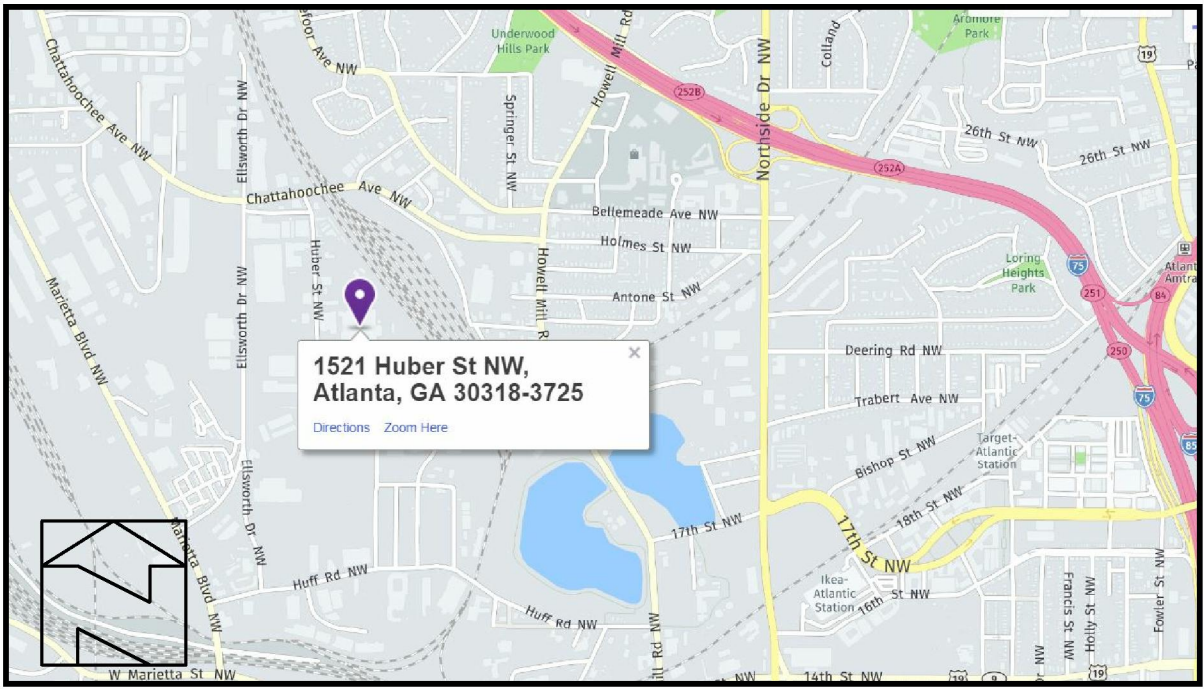
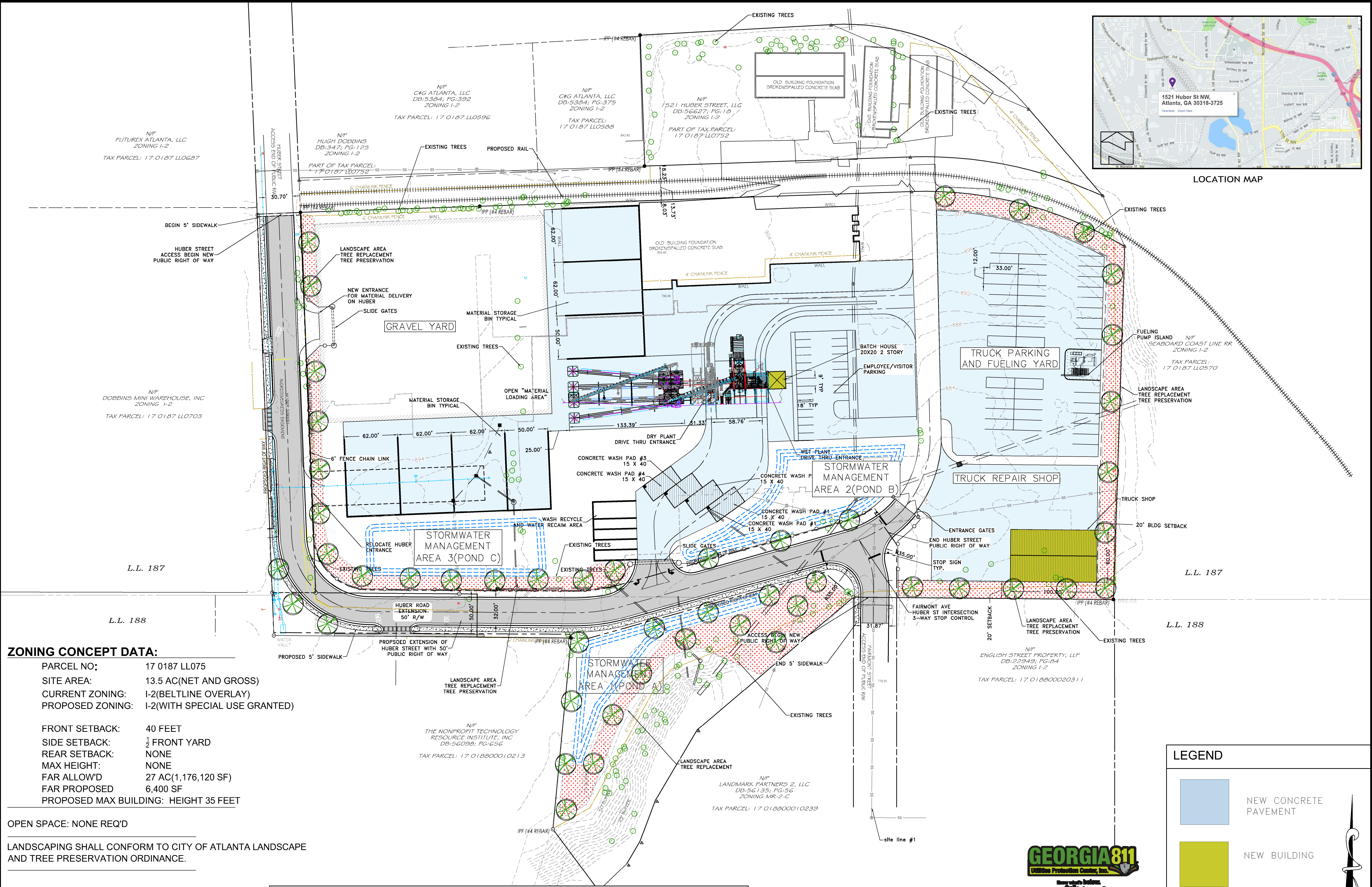
The purpose of this memorandum is to document the conditions for expedited review met by the proposed 1521 Huber Street Ready-Mix Concrete Plant that will be located east of Ellsworth Industrial Boulevard and south of Chattahoochee Avenue in Atlanta, Georgia. The location of the development is shown below in Figure 1.



Figure 1: Site Location

The Ready-Mix plant is planned to begin operations next year (2020) and meets the following condition for DRI expedited review: No more than 1,000 gross daily trips generated by the development. Trip generation estimates for the project were based on existing entering and exiting volumes collected at a similar facility in Marietta, Georgia and increased by 50% to account for the larger size of this proposed development. With an estimated 85% of the total traffic due to aggregate and mixer trucks, the site is estimated to generate a total 210 trips in a 24-hour period: 89 entering and 90 exiting truck trips as well as 15 entering and 16 exiting passenger car trips.

G:\17000\17179 - HUBER ROAD ATLANTA GIESKE\CIVIL\DESIGN\DRAWINGS\DESIGN 1.dwg 3/8/2019 11:07 AM



ZONING CONCEPT DATA:	
PARCEL NO:	17 0187 LL075
SITE AREA:	13.5 AC(NET AND GROSS)
CURRENT ZONING:	I-2(BELTLINE OVERLAY)
PROPOSED ZONING:	I-2(WITH SPECIAL USE GRANTED)
FRONT SETBACK:	40 FEET
SIDE SETBACK:	1/2 FRONT YARD
REAR SETBACK:	NONE
MAX HEIGHT:	NONE
FAR ALLOW'D	27 AC(1,176,120 SF)
FAR PROPOSED	6,400 SF
PROPOSED MAX BUILDING:	HEIGHT 35 FEET

OPEN SPACE: NONE REQ'D

LANDSCAPING SHALL CONFORM TO CITY OF ATLANTA LANDSCAPE AND TREE PRESERVATION ORDINANCE.

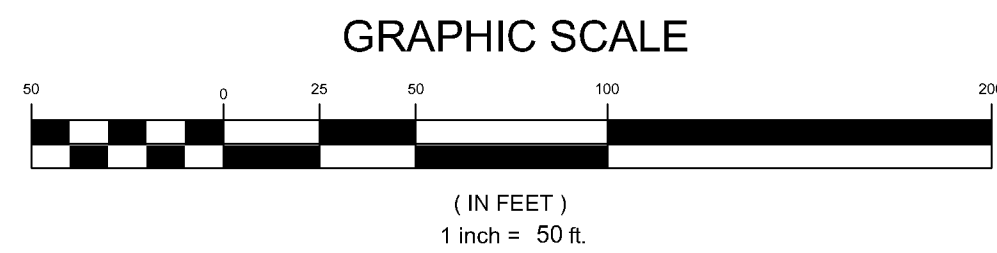
BUILDING AREA:	
SHOP 1	6,000 SF(60'X100')
BATCH HOUSE	800 SF(20'X20' - 2 STORY)
TOTAL AREA:	6,800 SF
PARKING:	
EMPLOYEE/VISITOR	24 SPACES
TRUCK STORAGE	40 SPACES

CERTIFICATION STATEMENT:

I AM FAMILIAR WITH THE CITY OF ATLANTA ZONING ORDINANCE, INCLUDING REVISIONS, AND I CERTIFY TO THE BEST OF MY ABILITY, THESE PLANS ARE ACCURATE AND COMPLY WITH THE GENERAL AND DISTRICT REGULATIONS OF THE ZONING ORDINANCE.

Kas...

11-1-2018



24 HOUR CONTACT
TOMMY GIESKE
615-633-7032

LEGEND	
	NEW CONCRETE PAVEMENT
	NEW BUILDING
	AREA OF GRAVEL
	EXISTING TREE
	PROPOSED LANDSCAPE AREAS

PROJECT NO.:
17179

DATE:
04/02/18

REVISIONS:	DATE	DESCRIPTION
1		
2		
3		
4		
5		
6		

SOUTHLAND
ENGINEERING

CIVIL ENGINEERS - LAND SURVEYORS - LAND PLANNERS

114 OLD MILL ROAD, CARTERSVILLE, GA 30120 PH: 770.387.0440 FAX: 770.607.6161

HUBER ST CONCRETE PLANT

LOCATED IN LAND LOTS - XXTH DISTRICT
X SECTION, CITY OF ATLANTA, GA.

SHEET TITLE:
SITE CONCEPT PLAN

SHEET NO.:
C201

UNSOLICITED COMMENTS

The following pages are unsolicited comments received from parties not defined as “affected parties” in the Georgia Department of Community Affairs (DCA) Rules for Developments of Regional Impact (Alternative Requirements—Atlanta Regional Commission) at Section 110-12-7-.06(1)(a), which states:

‘Affected Parties’ means: 1) any local governments within geographic proximity that may be impacted by a DRI project located outside of its jurisdictional limits; and 2) any local, state, or federal agencies including the Department that could potentially have concern about a project’s impact on regional systems and resources; 3) Georgia Regional Transportation Authority, if the proposed project is located within GRTA’s jurisdiction; and 4) the host Regional Commission plus any Regional Commission within geographic proximity that could potentially have concern about a project’s impact on regional systems and resources. This term should be liberally construed to ensure that all potentially affected local governments, public agencies, or Regional Commissions are included in the DRI Communication Procedures.

Andrew Smith

From: Renee Wright <renee@reneehome.com>
Sent: Thursday, December 26, 2019 2:16 PM
To: Andrew Smith
Cc: Greg Giuffrida; Jim (James) Martin
Subject: Blandtown Neighborhood Association (NPU-D) Huber Street Ready-Mix Comment
Attachments: Letter re - U-18-043-C2.pdf

Mr. Smith:

The Blandtown Neighborhood Association is submitting these comments in opposition to the Huber Street Ready-Mix concrete plant project, which the Atlanta ZRB unanimously recommended the City Council deny for a host of reasons relating to traffic and environmental impacts. BNA is attaching its comments to City planning staff, which we hope the ARC will consider and make part of its decision record with respect to the project. Thank you for your help with this!

Sincerely,
Renee Wright
President, Blandtown Neighborhood Association

BLANDTOWN NEIGHBORHOOD ASSOCIATION

February 26, 2019

Keyetta M. Holmes, AICP
Office of Zoning and Development Interim Director
Department of City Planning
City of Atlanta, Office of Zoning and Development
55 Trinity Avenue, Suite 3350
Atlanta GA 30303

Lenise Lyons, AICP
Urban Planner III
Office of Zoning & Development
City Hall, South Building
55 Trinity Avenue, Suite 3350

Re: Smyrna Ready Mix Concrete Batch Plant (U-18-043)

Dear Ms. Holmes and Ms. Lyons:

I am writing you on behalf of the Blandtown Neighborhood Association (“*BNA*”) concerning special use permit application U-18-043 filed by Smyrna Ready Mix (the “*Applicant*”) to build a concrete batch plant at 1521 Huber Street (the “*Project*”). As detailed below, the Project wholly fails to meet the relevant criteria for permit approval by the City of Atlanta (the “*City*”) as it presents numerous dangers to public safety, will adversely impact the surrounding community, and undermine the City’s own redevelopment plans for the Project area. Accordingly, the City must deny the Project.

1. Project Location

The Project is located within NPU-D, and is immediately adjacent to an area the City has slated for residential, commercial, and recreational use. The Project includes the construction of a concrete batch plant to be located at 1521 Huber Street, Atlanta, Georgia, 30318. The plant site is less than three hundred (300) feet from a newly constructed single-family residential development along Fairmont Avenue that will contain one hundred twenty-five (125) homes. In addition, the plant site will be located less than 1,000 feet from the Beltline path, and 1,500 feet from Elaine/Huff Transit Station, which is proposed in the City’s Beltline Master Plan for Subarea 8 as a future high density mixed-use development with accompanying open space.

The Project also includes the usage of heavy trucks that will deliver materials to the plant, and finished ready-mix concrete to offsite construction sites, as well as employee car trips. The traffic study states that the Project will generate 1,074 truck trips/week. The Project is not located next to any major arteries. Rather, Project trucks will utilize Fairmont Avenue, a residential street, as well as Huber Street as their main points of ingress/egress from the plant site. The trucks will

BLANDTOWN NEIGHBORHOOD ASSOCIATION

then connect to: (1) Huff Road via Fairmont Avenue, or (2) Chattahoochee Avenue via Huber Street or Ellsworth Industrial Boulevard. Ultimately, the trucks will use Howell Mill Road to access construction sites in the City's core.

Notably, the truck haul routes include Beltline crossings at Fairmont Avenue and Ellsworth Industrial Boulevard.

2. Special Use Permit Criteria

In order to move forward with the Project, the Applicant must obtain a special use permit (“*SUP*”) from the City. As described by the Georgia Supreme Court, the function of a special use permit is to afford a process to ensure that proposed future uses are compatible with surrounding uses in a particular area. *Dougherty County v. Webb*, 256 Ga. 474, 475(1), 350 S.E.2d 457 (1986). The City's SUP process is included in its Zoning Ordinance, section 16-25.002(3), which provides that the City may not approve a SUP unless a Project application contains “satisfactory provisions and arrangements” to meet certain land use requirements.

We note at the outset that the Project application is critically flawed and cannot be relied upon by the City or the public to make the compatibility determination which is at the heart of the SUP decisionmaking process. First, the Applicant has failed to describe in the Project application the plant's daily production levels. Without such information, it is impossible for the public and the City to determine, as a factual matter, whether the Project will meet the SUP criteria. The daily production levels, in large part, dictate the intensity of the Project's traffic impacts, air quality impacts, noise/light impacts, and other impacts that are evaluated as part of the SUP process. On this basis alone, the Project application is defective and should be rejected by the City.

Second, the Project application is defective because it fails to discuss in any meaningful detail the Project's air emissions, including emissions from the plant site and trucks delivering goods to and from the Project location. It is well known that concrete batch plants and ancillary diesel-powered concrete trucks emit air contaminants, including particulate matter and hazardous air pollutants.¹ Omitting this information from the Project application is a critical flaw, particularly given the fact that sensitive receptors (i.e., residents, pedestrians) will be in the immediate proximity of the Project location. Without information on air emissions being publicly disclosed, it is not only impossible for the City to make an informed determination as to whether the Project

¹ See generally, U.S. EPA, Background Document: General Air Quality Permit for New or Modified True Minor Source Concrete Batch Plants (https://www.epa.gov/sites/production/files/2016-09/documents/concrete_batch_plants_background_document_version_1.0_0.pdf). According to the EPA, particulate matter (PM) emissions come primarily from the transfer of cement and additive materials to the silos, the transfer of sand and aggregate, truck loading, mixer loading, and sand and aggregate blowing from the piles. Roadways internal to the plant site are also big contributors to the overall level of dust associated with a plant. The PM is comprised mainly of cement and dust from the additives; there are metals associated with the PM. Air pollutants - including carbon monoxide, nitrogen oxides, volatile organic compounds, particulate matter, nickel and formaldehyde - can also be generated by on-site internal combustion engines. In addition, truck and plant emissions from diesel-fueled equipment release diesel particulate matter (DPM), which is classified by EPA as a carcinogen. See https://cfpub.epa.gov/ncea/iris/iris_documents/documents/subst/0642_summary.pdf

BLANDTOWN NEIGHBORHOOD ASSOCIATION

is compatible with surrounding uses, but also deprives the public the ability to address a potential public health risk until *after* the Project is approved and is operational.

Third, the application fails to discuss the residential and planned recreational uses that surround the Project site. Specifically, the application makes no mention of the residential uses that are on Fairmont Avenue or the planned Beltline, which the Project's truck traffic will have to cross in order to access Huff Road. The Project application also fails to discuss traffic conditions on Huff Road, which trucks leaving the plant site will utilize to access Howell Mill Road, and which is itself is a mixed-use, residential street with over 1,500 apartment units located along its frontage. Without any description of these uses/conditions, it again is impossible for the City to make an information determination as to whether to approve an SUP for the Project.

It is in fact BNA's position that the Project is incompatible with surrounding community. As evidence, we refer to the letter from Mark Mitchell from Genesis Project, Inc., an environmental consulting firm, attached hereto as **Exhibit A**.

Having discussed broadly the flaws in the Project application, we now turn to the Project's (in)consistency with specific SUP criteria.

A. Ingress and egress to the property and proposed structure or uses thereon, with particular reference to automotive and pedestrian safety and convenience, traffic flow and control, and access in case of fire or other catastrophe.

We have a number of concerns relating to the Project's traffic impacts. Importantly, the Project traffic study does not evaluate impacts of the Project's truck trips to Huff Road or Howell Mill Road. The Project application details plans for "20-25 truck trips making 2-3 trips to and from" the Project location daily. For its part, the traffic study estimates the Project will generate 179 daily truck trips/1,074 truck trips per week. The application provides that the trucks will utilize Huber Street to create access to Chattahoochee Avenue for eventual access to Howell Mill Road. In addition, the trucks will utilize Fairmont Avenue to create access to Huff Road (and also Howell Mill Road). Despite the planned haul routes, the traffic study does not evaluate the effect of adding truck traffic to Huff Road - or the *entirety* of the Project traffic to Howell Mill Road. This is significant as both of these roads are operating near LOS F conditions during peak hours.

Next, the Project will have a major, adverse impact on pedestrian safety. As proposed, the Project will utilize Fairmont Avenue, which includes a residential neighborhood and a Beltline crossing. Trucks utilizing Fairmont Avenue present a significant and immediate danger to pedestrians and bicyclists living on Fairmont Avenue and/or using the Beltline. For the City to permit heavy concrete trucks to cross through a neighborhood and over the Beltline (on both Fairmont and Ellsworth Industrial) on an indefinite and regular basis would create nothing short of a public safety hazard. This position is supported by the Atlanta Beltline. See **Exhibit B**.

In addition, it is plain to those in the community that Project trucks seeking to turn on to Huff Road from Fairmont Avenue will pose a danger to oncoming traffic. Fairmont Avenue is very steep leading up to Huff Road. Consequently, truck drivers turning on to Huff Road will not have the visibility requisite to safely turn into what is usually a heavily trafficked thoroughfare.

BLANDTOWN NEIGHBORHOOD ASSOCIATION

This is an important safety and traffic congestion issue that the Applicant's traffic study fails to discuss.

Finally, concrete trucks weighing ten-plus tons making 1,074 trips per week will inevitably damage streets surrounding the Project site and those on the proposed haul routes. The Applicant has not proposed any mitigation measures to address these impacts, including any road maintenance funds. These impacts are especially significant given the City's investment of millions of dollars into the Huff Road Widening Project and to Howell Mill Road (discussed below).

B. Appropriate buffering or screening to alleviate such potentially adverse effects as may be created by noise, glare, odor, lighting, signs or traffic congestion.

The Project will result in significant impacts to surrounding residential communities from emissions of air contaminants, noise, and lighting. As evidence, we refer to the letter from Mark Mitchell from Genesis Project, Inc., attached hereto as **Exhibit A**. For impacts relating to traffic congestion, we refer back to subsection A.

C. Hours and manner of operations.

The Project's hours of operation are described as being from 6:00am-5:00pm Monday through Saturday, with evening operations occurring as a "special service" on select projects. These hours of operation are incompatible with the residential character of the adjacent single-family neighborhood, and further do not comply with the City of Atlanta's Noise Ordinance, which limits construction noise to the hours of 7:00am-8:00pm on weekdays, and 9:00am-8:00pm on weekends. Atlanta Code, § 74-134.

3. Additional Concerns

It is BNA's position that the risks to public safety that will result from the Project significantly outweigh any benefits it may provide. In fact, the only Project "benefit" stated by the Applicant is the creation of twenty (20) jobs. There is no evidence that the City is lacking in access to ready-mix concrete – that there is any need for the Project. On the contrary, NPU-D **already has three (3) ready mix concrete plants**. These include:

Standard Concrete Plant
1848 Hollywood Rd.
Atlanta, GA 30318

Thomas Concrete Plant
1430 Marietta Blvd NW,
Atlanta, GA 30318

Ready Mix USA Concrete Plant
1360 Marietta Blvd NW,
Atlanta, GA 30318

BLANDTOWN NEIGHBORHOOD ASSOCIATION

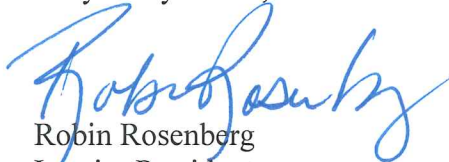
NPU-D should not be the designated zone for the City's concrete batch plants, and in fact the City's planning goals for the area would seem to prohibit such a result. The City's planning policies for NPU-D, including the Project area, foresee a mixed-use residential district with open space areas, and the state-of-the-art Elaine/Huff Station transit facility. See, e.g., Beltline Subarea 8 Master Plan, p. 2-7. For the City to place another concrete batch plant in NPU-D, and at the Project location in particular, clearly runs afoul of these policies, a position that is again supported by the Atlanta Beltline. See Exhibit B.

Finally, as referenced above, all Project truck traffic will utilize Howell Mill Road. The City has designated Howell Mill Road as a "complete street," and plans to spend significant public funds to: (1) provide bike/scooter lanes to facilitate multi-modal transit options, (2) repave the roads after many years of with no public investment, and (3) add improvements that will safely allow pedestrians and bikers, etc. to travel from West Midtown to the Beltline and vice versa. Adding 1,074 heavy truck trips weekly to Howell Mill Road will plainly undermine the City's investment.

* * * * *

For all the reasons described above, we again urge you to reject the Project and protect the citizens of NPU-D and Blandtown from would be a threat to public health and safety, and the City's own efforts to redevelop the neighborhood into a residential, mixed-use destination. We look forward to discussing this letter and the Project with you in person at your earliest convenience.

Very Truly Yours,



Robin Rosenberg
Interim President,
Blandtown Neighborhood Association

cc: Councilmember Andre Dickens
Councilmember Dustin Hillis
Councilmember Carla Smith
Councilmember Matt Westmoreland

Exhibit A



Genesis Project, Inc.

ENVIRONMENTAL SERVICES

February 25, 2019

Ms. Robin Rosenberg
Interim President
Blandtown Neighborhood Association

RE: Fairmont – Concrete Readymix Plant
Special Use Permit Application for 1521 Huber St, NW

Dear Ms. Rosenberg,

Genesis Project has completed a review of the Special Use Permit Application for 1521 Huber St, NW (U-18-043). This permit would allow the operation of a ready-mix concrete plant on the property. In the past, the property was used for the manufacturing of paint products. Based on our review of the permit application, several concerns were identified. These include the following:

Characterization of Adjacent Property Use

The application describes the area is “consistent with active industrial uses currently operating on surrounding properties”. This statement is not accurate since multiple non-industrial uses are in the immediate vicinity of the proposed project.

- A residential development is located on the southern property boundary;
- A recreational/entertainment complex (Top Golf) is to the west; and
- Multiple restaurants to the southwest.

It is evident that this area is transitioning from a former industrial use area to a mixed use residential/commercial area.

Soil and Groundwater Quality at Detention Pond Location

The site plans have identified a proposed detention pond located downgradient of former paint production facility. There is a concern that future mounding of water in this area may mobilize historic soil and groundwater impacts, originating from the property, towards the off-site tributary of Woodall Creek and the residential neighborhood. There was no soil and groundwater quality data in this area to confirm that this would not occur.

Dust Emissions

Although these plants are reportedly an improvement over ones in the past, their operation does not prevent fugitive dust emissions from product management. Our concerns include:

- The prevailing wind direction is to the southeast, towards residential development.
- How will the applicant mitigate dust emissions from the gravel yard and material storage bins as well as the concrete batch plant to eliminate any impact to the residential development?
- There is no mention of the preparation of an Air Quality Permit under the authority of Georgia Rule for Air Quality Control 391-3-1. This process will require public input prior to permit approval.

Traffic, Noise and Light Pollution

As discussed previously, the proposed Batch Plant is within 500 feet of residential neighborhood. In addition, the application includes a request for ingress and egress onto a residential street (Fairmont Ave). The application includes the following estimates:

- Up to 179 trips by cement trucks to and from jobsite each day (Traffic Impact Study, A&R Engineering December 11, 2018)
- Operation from 6:00am to 5:00pm Monday through Saturday, with options to work evenings as well.

Based on these estimates, the report shows that a significant increase in truck traffic will occur in the immediate vicinity to and along a residential street. There is no mention in the traffic study of the adjacent residential property use and the plants impact to those neighborhoods.

In addition, both noise and light, emanating from the plant, would be a potential threat to the quality of life of the residents in these homes both during the work week as well as on the weekend. The applicant provides no data to address these concerns other than mentioning a similar situation in their Nashville operation; however, a review of the actual conditions at the Nashville location is not the same as the situation at Huber St property because the Nashville property is located in a downtown/urban setting with existing ambient light and noise, rather than adjacent to a quiet single family neighborhood.

Summary

Based on our review of the data, it is apparent that the project area is in transition from a former industrial area to a mixed use residential/commercial area of Atlanta. This proposed concrete batch plant is inconsistent with this transition and will potentially expose residents (including children) with a multitude of environmental and physical hazards.

Sincerely,
GENESIS PROJECT, INC.



Mark D Mitchell, PG
Principal

Exhibit B



January 15, 2019

Attn: Keyetta Holmes, Interim Director
City of Atlanta
Department of Zoning and Development
55 Trinity Avenue
Suite 3350
Atlanta, GA 30303

Re: Special Use Permit for 1521 Huber Street – Concrete Plant

Dear Ms. Holmes,

The Atlanta BeltLine would like to provide its comments on the Special Use Permit for the concrete plan proposed at 1521 Huber Street.

On March 16, 2009 the City Council adopted the Atlanta BeltLine Subarea 8 Master Plan, which provided land use recommendations that would promote mixed-use and transit-oriented development to support the future BeltLine trail and transit corridor. Over the past 7 years this segment of the community has rapidly transitioned to a mixed-use area with event venues and several residential developments, many of which are either underway or proposed along Fairmont Avenue, Culpepper Street and parts of English Avenue. Given its proximity to the active rail yard, this location would be ideal for the Industrial Mixed-Use district, which is currently going through the city's legislative process to be adopted, and the I-Mix designation would be the preferred land use transition into an evolving mixed-use community.

While we understand why a concrete plant desires to locate near prospective construction projects; however, the permanent nature of this use conflicts with the adopted future land use and mobility recommendations that were developed in concert with the community. Further, the Northwest BeltLine trail and transit corridor is planned just .26 miles south of the site along the northern side of Culpepper Street (see attached map). Allowing a Special Use Permit for a concrete plant near the future BeltLine Northwest Trail will put truck traffic and trail users in a hazardous situation along Fairmont Avenue.

It is the position of the Atlanta BeltLine Inc. that this Special Use Permit be denied for the concrete plant at 1521 Huber.

Sincerely,

A handwritten signature in blue ink, reading "Beth McMillan", with a long, sweeping horizontal line extending to the right.

Beth McMillan
Planning, Engagement and Arts Director

Cc: Valerie L. Lineberger, Office of Zoning & Development



Atlanta
BeltLine



BeltLine Subarea B:
UPPER WESTSIDE /
NORTHSIDE

BELTLINE
LAND USE PLAN

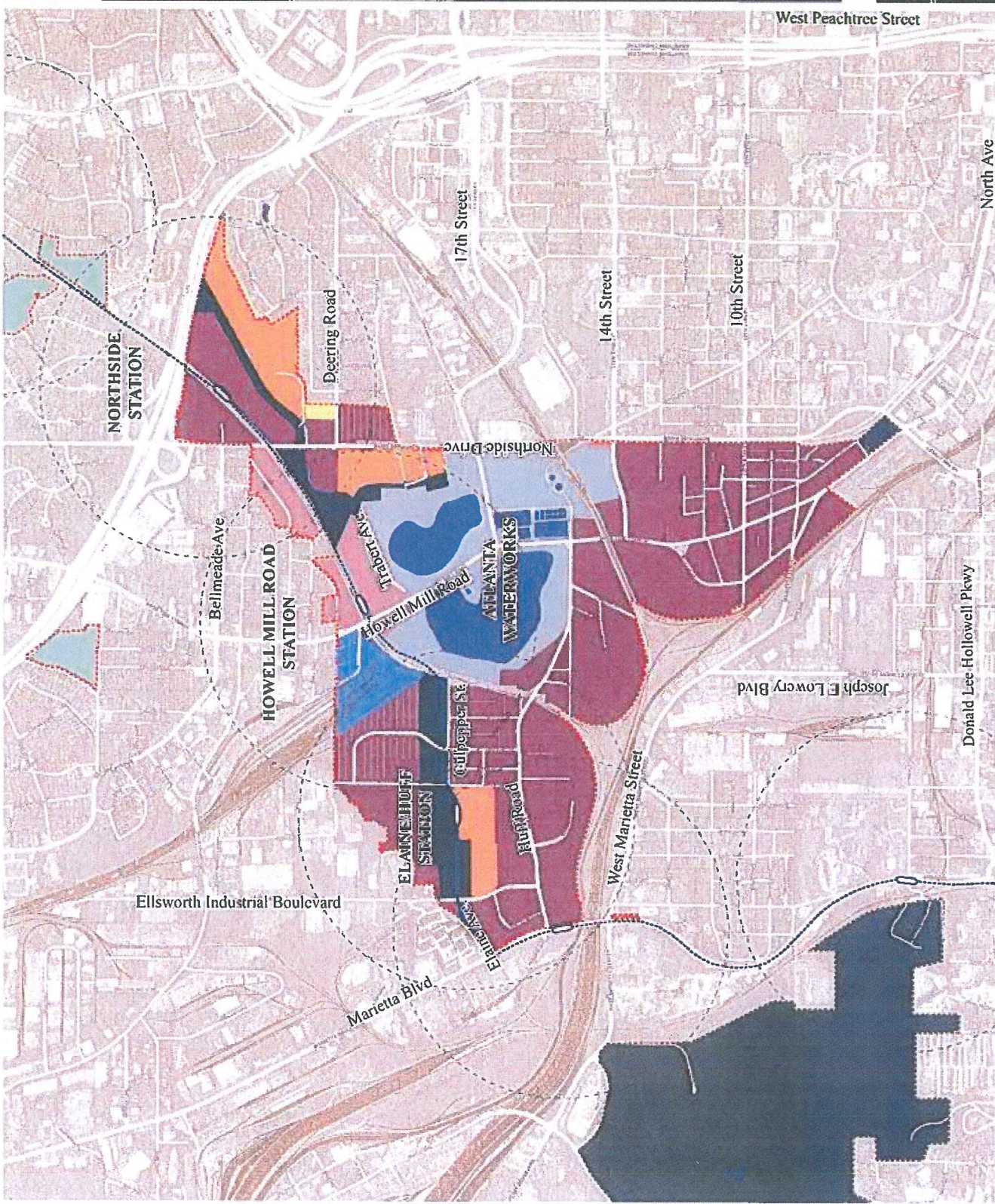
LEGEND

- Mixed Use
5-20 stories
- Mixed Use
Industrial
- Mixed Use
1-4 stories
- Residential
5-20 stories
- Residential
1-4 stories
- Office
Mixed/Industrial
- Industrial
- Proposed
Park Space
- Existing
Park Space

AECOM



SCALE IN FEET
0 500 1,000



Transit Alignment Options

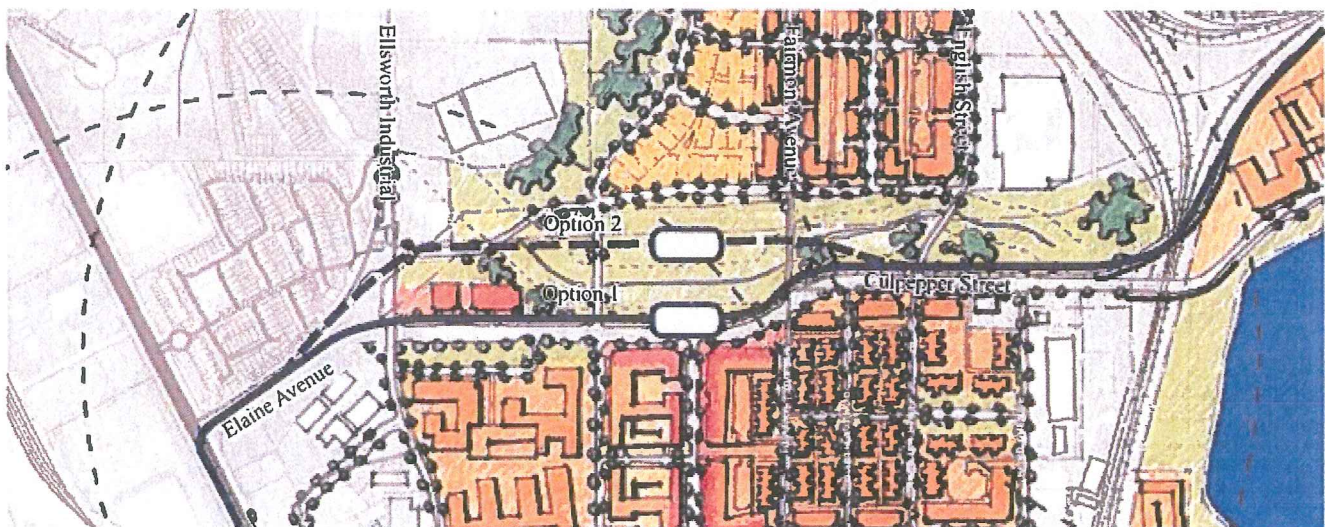
There are two alignment options available for Atlanta BeltLine Transit through the open space corridor contingent on further engineering analysis. Both alternatives can occur within the framework outlined in the illustrative urban design plan.

- **Option 1: South of Creek** - Option 1 places the station closer to Huff Road and potential development opportunities and aligns the transit corridor adjacent to the Elaine/Culpepper Street corridor. This option stays south of the creek and stream buffer and does not interfere with the utility easement.
- **Option 2: Between Utility Easement and Creek** - Option 2 places the station between the utility easement and creek stream buffer. This option minimizes needed transit right-of-way but places the station away from redevelopment in the center of the open space corridor.

Street Framework

An increasing amount of traffic has been placed on the Huff Road corridor as a result of the area's existing industrial uses, new residential development, and limited connectivity. This plan provides a framework for growth that increases overall connectivity within the station area and eastward to Howell Mill Road and Northside Drive. The Street Framework Plan includes:

- **Elaine/Culpepper Street corridor extension** - The construction of a new east-west connection between Marietta Boulevard and Northside Drive will provide needed east-west connectivity and a parallel alternative to Huff Road. In this station area, the connection is created by extending Culpepper Street west to Ellsworth Industrial Boulevard/Elaine Avenue and east over the CSX rail corridor to Howell Mill Road. This new street creates an active and public edge to the proposed open space corridor that will also include the BeltLine Transit and Trail alignments.
- **New Residential Streets** - A framework of new streets will improve overall connectivity within the station area by structuring a series of walkable urban blocks. These new streets will maximize internal connectivity to the transit station, trails, open space and neighborhood supporting retail and office uses.
- **Fairmont Avenue Connection** - A new north-south connection from Huff Road to Chatahoochee Avenue is created by extending Fairmont Avenue to Huber Street. This extended connection provides a parallel connection to Ellsworth Industrial Boulevard and an additional connection north from the station area.



Atlanta BeltLine Transit Alignment Options