

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: JANUARY 8, 2020 ARC REVIEW CODE: R1912202

TO: Mayor Keisha Lance Bottoms

ATTN TO: Monique Forte, Urban Planner III, Office of Mobility Planning

FROM: Douglas R. Hooker, Executive Director

RE: Development of Regional Impact (DRI) Review

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Original on file

The Atlanta Regional Commission (ARC) has completed 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: The Works

Submitting Local Government: City of Atlanta

Review Type: Development of Regional Impact Date Opened: Dec. 20, 2019 Date Closed: Jan. 8, 2020

<u>Description</u>: This DRI is on approximately 27 acres in the City of Atlanta, on the north side of Chattahoochee Avenue near its intersections with Southland Circle and Chattahoochee Row (formerly called Permalume Place). The site is bounded by Woodall Creek and Van Heusen Boulevard on the west and Makers Way on the east. The mixed-use development is planned to consist of approximately 340 multi-family units; 147,000 SF of office space; 114,800 SF of restaurant space; and 88,200 SF of retail space. The site currently consists of a mix of vacated and occupied warehouse/commercial buildings, some of which will be demolished and some of which will be repurposed. Site access is proposed via four existing driveways on Chattahoochee Avenue as well as an extension of Chattahoochee Row, from its current terminus eastward to Makers Way and beyond to Ellsworth Industrial Boulevard. The estimated build-out year for this project is 2022. The local trigger action for the DRI review is a rezoning.

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

This DRI appears to manifest aspects of regional policy, including many of those at the bottom of this narrative. The plan contemplates a mixed-use, infill adaptive-reuse/redevelopment featuring significant housing, office and retail/restaurant uses, with pedestrian-oriented infrastructure and amenities throughout the site. The mix of uses offers the potential for site residents to work and shop on-site or in the same district, and for workers and visitors to arrive via an alternative transportation mode or park once and conduct multiple trips on foot, thereby reducing single-occupancy vehicle trips. The project is also a significant new example of the City of Atlanta's I-MIX zoning category, which is intended to permit a mix of industrial and non-industrial uses in growing areas without eliminating land for limited industrial uses in the future.

To capitalize on this potential, care should be taken to ensure that the development, as constructed, promotes an interconnected, functional, clearly marked and comfortable bike/pedestrian experience on all streets, paths, entrances, and parking areas. The development team is also encouraged to ensure that end-of-trip facilities are provided for residents, workers and visitors at key locations, e.g., scooter and bicycle storage racks throughout the site, lockers/showers in office spaces, etc. These recommendations are made

given that the applicant used an 8% alternative mode trip reduction in the SRTA/GRTA-required DRI traffic study. Particular attention should be paid to the location and accessibility of transit stops adjacent to the site, including the stop across Chattahoochee Avenue for eastbound passengers. Pedestrian access across Chattahoochee Avenue will be improved with the addition of crosswalks in the proposed intersection realignment of Southland Circle NW and Chattahoochee Row (private). For the existing westbound stop, a shelter should be provided in coordination with MARTA. With the provision of high-quality bike/pedestrian facilities and infrastructure, there is the potential for actual alternative mode use that exceeds 8% as the site and the surrounding area develop and mature.

Chattahoochee Avenue is an urban arterial route that already sees significant volume throughout the day, along with freight demands for the many surrounding industrial uses. The Upper Westside Community Improvement District (CID) notes in its attached comments that this DRI along with other expected redevelopment projects in the surrounding area will require planning and investment in multimodal options for Chattahoochee Avenue. The CID has applied with Atlanta Regional Commission for a funding of a study of long-term transportation options for the corridor through the Transportation Improvement Program (TIP). The CID further notes that there are options to use excess right-of-way for future transit and/or active transportation modes.

The applicant team should ensure that project driveways and intersections and any associated improvements (e.g., new turn lanes, traffic signals, etc.) are designed and implemented in full coordination with the City of Atlanta, to safely and efficiently accommodate the DRI's projected automobile traffic. Internal streets and driveways should be designed to minimize driving speeds and prioritize safety and comfort of pedestrians throughout the site, through the use of reduced lane widths, shorter curb radii, raised crossings, bulb-outs, and other design features. This project is notable for its potential to expand the street grid in the area, and future street connections should be preserved in the site plan.

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 a general sense, the DRI's development program is consistent with the RDG, specifically in terms of promoting mixed-use development and redeveloping with design that echoes the light industrial character of the surrounding area. The intensity of this proposed project is within the RDG's recommended parameters for density and building height for the Maturing Neighborhoods area of the region. However, it will still be critical for City leadership and staff, along with the applicant team, to collaborate to the greatest extent possible to ensure maximum sensitivity and mitigate potential impacts to nearby neighborhoods, natural resources and land uses.

Additional preliminary ARC staff comments focused on water resources and transportation are attached to this report. Georgia Department of Transportation's Aviation division notes that the project is located near a navigation facility, requiring notification with the Federal Aviation Administration.

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
CITY OF ATLANTA

ARC TRANSPORTATION ACCESS & MOBILITY
ARC AGING & INDEPENDENCE SERVICES
GEORGIA DEPARTMENT OF TRANSPORTATION
GEORGIA SOIL AND WATER CONSERVATION COMMISSION
ATI ANTA BEIT LINE, INC.

ARC NATURAL RESOURCES
GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS
SRTA/GEORGIA REGIONAL TRANSPORTATION AUTHORITY
ON METROPOLITAN ATLANTA RAPID TRANSIT AUTHORITY
UPPER WESTSIDE CID

If you have any questions regarding this review, please contact Greg Giuffrida at (470) 378-1531 or ggiuffrida@atlantaregional.org. This finding will be published to the ARC review website located at http://atlantaregional.org/plan-reviews.

Greg Giuffrida

From: Elizabeth Hollister <elizabeth@upperwestsideatl.org>

Sent: Monday, January 6, 2020 4:00 PM

To: Greg Giuffrida **Cc:** Adeline Collot

Subject: Statement from CID for Works DRI

Greg,

Here are our CID's comments regarding The Works DRI. Please let me know if you have any feedback or need any additional info from us.

Best,

Elizabeth

Upper Westside CID is supportive of the Works development on Chattahoochee Avenue with the understanding that Chattahoochee Avenue will need to become a multi-modal corridor to mitigate the growing traffic congestion. Even as a current freight route, Chattahoochee Ave appears to have excess right of way capacity in certain areas that could be repurposed for other transportation modes. The addition of sidewalks by the Works will be one significant improvement. Any investment that the Works developer can make in transit amenities is also welcome. While the demand on Chattahoochee Avenue will be significantly increased by a development of this size and intensity, many surrounding parcels are concurrently densifying. The combined effects are even more significant than can be addressed by one developer.

Upper Westside CID applied for a TIP funded study of how Chattahoochee Avenue can meet the needs of both people and cargo, the ARC has an opportunity to have a more active role beyond the DRI through the TIP study. The Works is likely just the first of many additional properties leverage the city's new I-Mix zoning category.



ELIZABETH HOLLISTER | Executive Director

upper westside improvement district 404 | 444 8424

Greg Giuffrida

From: Hood, Alan C. <achood@dot.ga.gov>
Sent: Monday, December 30, 2019 11:11 AM

To: Greg Giuffrida

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

Timothy.Beggerly@fultoncountyga.gov

Subject: RE: ARC DRI Review Notification - The Works (DRI 3030) Attachments: ARC Preliminary Report - The Works DRI 3030.pdf

Greg,

The proposed mixed-use development of approximately 340 multi-family units; 147,000 SF of office space; 114,800 SF of restaurant space; and 88,200 SF of retail space is on approximately 27 acres in the City of Atlanta, on the north side of Chattahoochee Avenue near its intersections with Southland Circle and Chattahoochee Row (formerly called Permalume Place). It is located approximately 5 miles east of the Fulton County Airport – Brown Field (FTY) and is located outside their FAA approach or departure surfaces, and airport compatible land use areas, and does not appear to impact the airport.

However, the proposed development 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

From: Greg Giuffrida < GGiuffrida@atlantaregional.org>

Sent: Friday, December 20, 2019 4:04 PM

To: aspiliotis@srta.ga.gov; Annie Gillespie <agillespie@srta.ga.gov>; Boone, Eric <eboone@dot.ga.gov>; 'ccomer@dot.ga.gov'; 'chuck.mueller@dnr.state.ga.us'; 'cyvandyke@dot.ga.gov'; 'davinwilliams@dot.ga.gov'; Delgadillo Canizares, Marlene V. <mcanizares@dot.ga.gov>; DeNard, Paul <pdenard@dot.ga.gov>; Finch, Ashley M <AFinch@dot.ga.gov>; Fowler, Matthew <mfowler@dot.ga.gov>; Green, Henry <hgreen@dot.ga.gov>; Hatch, Justin A

Greg Giuffrida

From: Finch, Ashley M <AFinch@dot.ga.gov>
Sent: Friday, January 3, 2020 3:10 PM

To: Greg Giuffrida

Subject: RE: ARC DRI Review Notification - The Works (DRI 3030)

Greg,

Below are the GDOT Intermodal Rail DRI Review comments. Let me know if you have any questions.

GDOT Office of Intermodal Rail Division ARC DRI Review Notification - The Works (DRI 3030)

GDOT Intermodal has reviewed this DRI with respect to freight railroads. Adjacent to the DRI property is a Class 1 freight railroad mainline operated by CSX. The railroads and FRA report approximately 10 trains per day at this location on average.

The public crossings adjacent or near the project location are described below.

Public crossings in the vicinity of the project:

1. Crossing ID: 639131X

a. Location: COLLIER RD

b. Operator: CSX

c. Railroad Mile Post: 0576.45

d. Grade: Railroad Over

e. Quiet Zone: No

2. Crossing ID: 639130R

a. Location: Chattahoochee Ave.

b. Operator: CSX

c. Railroad Mile Post: 0575.68d. Grade: Railroad Under

e. Quiet Zone: No

For more specifics about operations of this railroad, please contact CSX at 904-359-3200.

More information about crossings and freight rail in this area can be found at https://fragis.fra.dot.gov/GISFRASafety/

Thanks,

Ashley

Ashley Finch

Rail Planner





regional impact + local relevance

Development of Regional Impact

Assessment of Consistency with the Regional Transportation Plan

DRI INFORMATION

DRI Number #3030

DRI Title The Works

County Fulton County

City (if applicable) City of Atlanta

Address / Location West of Ellsworth Industrial Boulevard, north of Chattahoochee Avenue and south of

Logan Circle.

Proposed Development Type:

27 acres mixed use development consisting of residential, office, retail and

restaurant

Review Process EXPEDITED

NON-EXPEDITED

REVIEW INFORMATION

Prepared by ARC Transportation Access and Mobility Division

Staff Lead Marquitrice Mangham

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Date December 23, 2019

TRAFFIC STUDY

Prepared by Kimley Horn

Date December 18, 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)
□ NO (provide comments below)
The traffic analysis consists of a list of programmed improvements identified in the RTP. Factsheets of the propose projects are included in the Appendix.
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)
Five site access points are proposed from Chattahoochee Avenue and Ellsworth Industrial, local and collector streets.

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.

\boxtimes	NO
	YES (identify the roadways and existing/proposed access points)

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

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

\boxtimes	NOT APPLICABLE (nearest station more than one mile away)	
	RAIL SERVICE WITHIN O	NE 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 di development site	rect feasible walking or bicycling route to the nearest point on the
05. If there is currently no rail transplanned in the fiscally constrained I	sit service within one mile of the development site, is nearby rail service 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

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

improvements completed concurrent with or prior to the transit service being brought online.

05. 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.

	•	rest bus, shuttle or circulator stop more than one mile away)
\boxtimes	SERVICE WITHIN ONE	MILE (provide additional information below)
	Operator(s)	MARTA
	Bus Route(s)	14
	Distance*	igotimes 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)
		Sidewalk access to bus stops are not currently available.
	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)

06. 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?

pedestrian access to internal and adjacent land uses.

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

_	t site is within one mile of an existing multi-use path or trail, provide information
who cannot or pr and jobs, and can or trail is available facilities is a chall	najor developments and walking/bicycling facilities provide options for people efer not to drive, expand economic opportunities by better connecting people help reduce traffic congestion. If connectivity with a regionally significant path e nearby, but walking or bicycling between the development site and those lenge, the applicable local government(s) is encouraged to make the route a future walking and bicycling infrastructure improvements.
_	BLE (nearest path or trail more than one mile away) dditional information below)
Name of facili	
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 Acces	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 Acce	
	1 mile of the proposed route for the Atlanta BeltLine, but construction of this spected within the timeline of the buildout for this DRI.

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

OTHER TRANSPORTATION DESIGN CONSIDERATIONS

	oes the site plan provide for the construction of publicly accessible local road or drive aisle onnections 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)
,	Vehicular access to adjacent uses are provided by local roads and driveways.
	oes the site plan enable pedestrians and bicyclists to move between destinations within the evelopment 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)
Т	he site plan depicts internal and external pedestrian facilities as a part of the development.

10. 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?

ı	The ability for walkers and bicyclists to move between developments safely and conveniently educes reliance on vehicular trips, which has congestion reduction and health benefits. Such pportunities should be considered and proactively incorporated into development site plans whenever possible.
\triangleright	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)
Th	e site plan depicts sidewalks providing pedestrian connectivity to adjacent parcels.
fre	es the site plan effectively manage truck movements and separate them, to the extent possible, om the flow of pedestrians, bicyclists and motorists both within the site and on the surrounding ad network?
fro ro	m the flow of pedestrians, bicyclists and motorists both within the site and on the surrounding
fro ro	om the flow of pedestrians, bicyclists and motorists both within the site and on the surrounding ad network? The ability for delivery and service vehicles to efficiently enter and exit major developments is ften key to their economic success. So is the ability of visitors and customers being able to move round safely and pleasantly within the site. To the extent practical, truck movements should be egregated by minimizing the number of conflict points with publicly accessible internal roadways,
fro ro	om the flow of pedestrians, bicyclists and motorists both within the site and on the surrounding and network? The ability for delivery and service vehicles to efficiently enter and exit major developments is ften key to their economic success. So is the ability of visitors and customers being able to move round safely and pleasantly within the site. To the extent practical, truck movements should be egregated by minimizing the number of conflict points with publicly accessible internal roadways, idewalks, paths and other facilities. YES (truck routes to serve destinations within the site are clearly delineated, provide ample space
fro ro	In the flow of pedestrians, bicyclists and motorists both within the site and on the surrounding and network? The ability for delivery and service vehicles to efficiently enter and exit major developments is ften key to their economic success. So is the ability of visitors and customers being able to move round safely and pleasantly within the site. To the extent practical, truck movements should be egregated by minimizing the number of conflict points with publicly accessible internal roadways, idewalks, 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

RECOMMENDATIONS

12.	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.
13.	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.
14.	ARC offers the following additional comments for consideration by the development team and/or the applicable local government(s): None.

THE WORKS DRI City of Atlanta Natural Resources Group Review Comments December 20, 2019

Watershed Protection and Stream Buffers

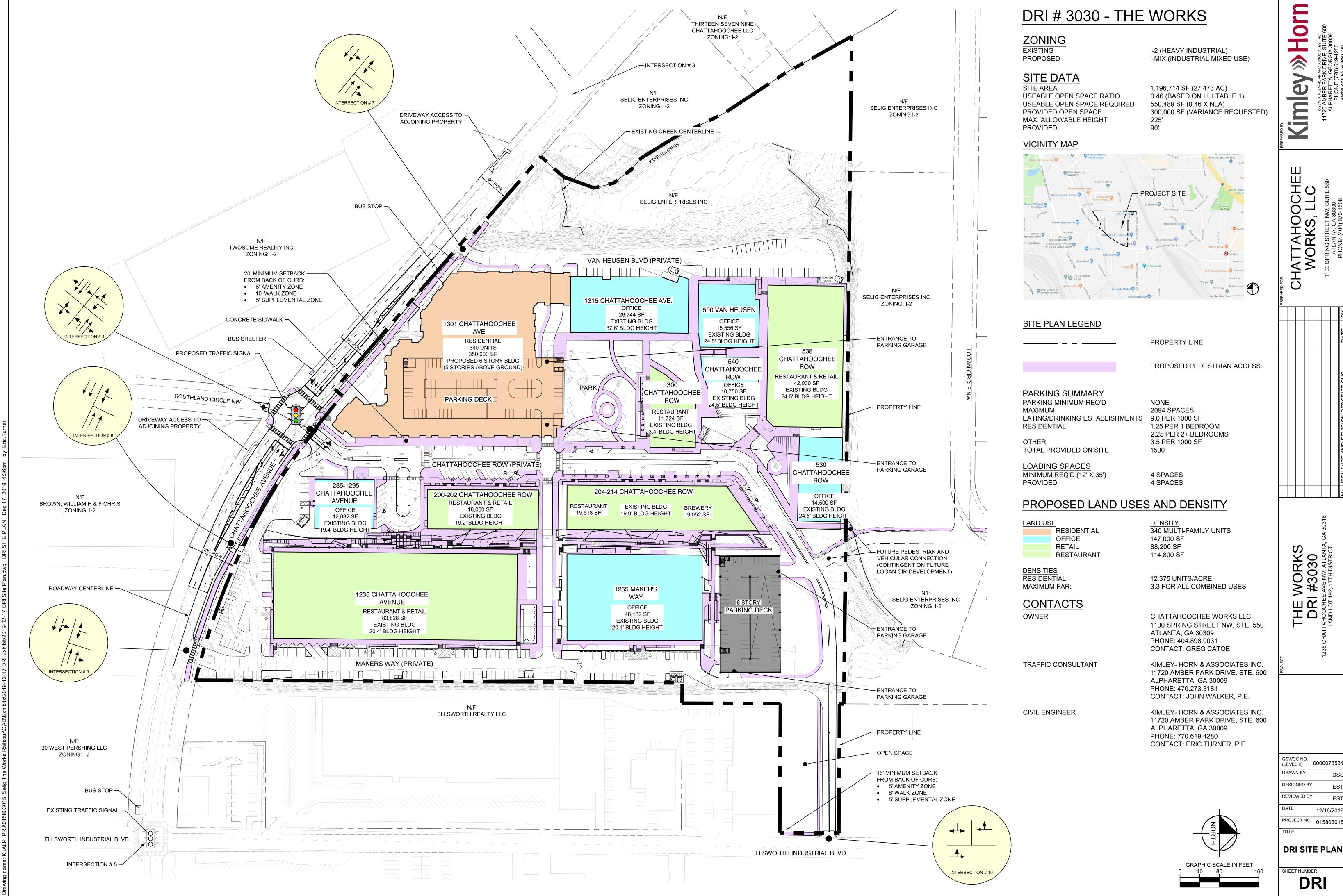
The proposed project is located in the Peachtree Creek watershed, which is part of the Chattahoochee River watershed and enters the river downstream of the Region's water intakes. Based on the submitted site plan, the proposed project is located on an already developed portion of the project property. Both the site plan and the USGS coverage for the project area shows a blue line stream running along the eastern edge of the property, which is not currently developed and is shown as undeveloped on the proposed site plan. Nevertheless, the stream is still subject to both the City of Atlanta's Stream Buffer Ordinance and the State Sedimentation and Erosion Control Buffer. The City's 50-foot buffer and 75-foot impervious surface setback as well as the State 25-foot buffer should be shown on the plans. Any unmapped streams on the property may also be subject to the City Stream Buffer Ordinance, and any other waters of the state that may be on the property will also be subject to the State 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.
- Using pervious concrete or other pervious materials in parking areas. With the proper substrate, such materials can provide a large storage capacity, which will further help to reduce stormwater runoff.
- Including rainwater capture in the project design to provide for landscape irrigation during dry periods.



This document, together with the concepts and designs presented herein, as an instrument of service, is intended only for the specific purpose and client for which it was prepared. Reuse of and improper reliance on this document without written authorization and adaptation by Kimley-Horn and Associates, Inc. shall be without liability to Kimley-Horn and Associates, Inc.

12/16/201