

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: Feb. 3, 2020 **ARC REVIEW CODE:** R2001131

TO: Mayor J. Clark Boddie

ATTN TO: William Shell, City Administrator

FROM: Douglas R. Hooker, Executive Director

RE: Development of Regional Impact (DRI) Review

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Drayle R. Hok

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: Palmetto Site (DRI #3020)
Submitting Local Government: City of Palmetto

Review Type: Development of Regional Impact **Date Opened**: Jan. 13, 2020 **Date Closed**: Feb. 3, 2020

<u>Description</u>: A Development of Regional Impact (DRI) review for a proposed warehouse development of approximately 615,600 SF. The 57.41-acre site is located within the City of Palmetto along the south side of Roosevelt Highway (US 29/SR 14), east of Phipps Road, west of Bowen Road, and north of Johnson Road. The proposed site plan shows one driveway connecting to the east on Bowen Road. The review is expedited under GRTA rules for Limited Trip Generation because it is expected to generate more than 1,000 trips but no more than 3,000 trips. The local trigger for this review is a height variance. Expected buildout is 2021.

<u>Comments:</u> According to the ARC Unified Growth Policy Map (UGPM), part of The Atlanta Region's Plan, this DRI is in the Developing Suburbs 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 Developing Suburbs areas are listed at the bottom of these comments.

This DRI manifests certain aspects of regional policy. The plan contemplates a warehouse/distribution facility, supporting regional economic development. It also offers the potential for efficiencies and connectivity in intraregional, interregional and interstate freight movement given its proximity to I-85, Roosevelt Highway (SR 29), and the CSX intermodal facility in Fairburn.

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. Although the site is not directly served by MARTA, it is within about a half-mile walk from the nearest stop for the #180 bus route. With the construction of an ADA-accessible sidewalk on Bowen Road in the future, this makes transit a viable option for employees.

Additionally, the applicant team should ensure that project driveways and any associated improvements are implemented in full coordination with the City of Palmetto, GDOT, and CSX, especially relating to planned improvements to the intersection of Bowen Road (primary site access), Tatum Road, and Roosevelt Highway, where there is also an at-grade railroad crossing.

The DRI's site design should provide sufficient truck parking to prevent trucks from queuing or waiting on any adjacent or nearby roads. Trucks parking in and along public roadways – typically while waiting for an available dock at a nearby facility – is an identified issue in many areas of the region that negatively impacts roadway operations, safety and congestion. Signage and other measures to ensure drivers use the appropriate freight routes should be emphasized.

The Georgia Department of Natural Resources notes in its attached comments that federally listed species have been documented near the project and recommends consultation with the U.S. Fish and Wildlife Service. The project is in a high-priority watershed and the Department is concerned that streams and other habitats could be impacted by the project. Stringent erosion control practices are recommended and vegetation should be re-established as quickly as possible. ARC's Natural Resources Group notes that a portion of the proposed structure and trailer parking area is shown intruding on the headwaters of a small Shoal Creek tributary running into the property, which may require variances for the City and State buffers.

Georgia Department of Transportation's aviation division notes that the project is near a navigation facility and requires an FAA Form 7460-1 to be submitted. Additional ARC staff comments, focused on transportation and water resources planning, are attached to this report.

The intensity of this DRI generally falls within with the ARC RDG's recommended development parameters for density and building height for Developing Suburbs. In terms of land use, the project is in a part of the region that is experiencing rising demand for warehouse/distribution development. The site is also in close proximity to existing industrial and warehouse/distribution uses along Roosevelt Highway.

The City's comprehensive plan (2017) indicates that the DRI site is in an industrial area in terms of future land use. The properties immediately surrounding the DRI are largely undeveloped, except for a handful of single-family homes and small farms. Care should be taken to collaborate to the greatest extent possible to ensure maximum sensitivity and mitigate potential impacts to nearby local governments, neighborhoods, natural resources and land uses.

Further to the above, Developing Suburbs are areas that have developed from roughly 1995 to today and are projected to remain suburbs through 2040. General policy recommendations for Developing Suburbs include:

- New development should connect to the existing road network and adjacent developments and use of cul-de-sacs or other means resulting in disconnected subdivisions should be discouraged

- Maximize the usefulness of existing recreational facilities in addition to providing new recreational opportunities
- Eliminate vacant or under-utilized parking areas through mechanisms such as out-parceling or conversion to community open space
- Use rain gardens, vegetated swales or other enhanced water filtration design to enhance the quality of stormwater run-off
- Identify other opportunities to foster a sense of community by developing town centers, village centers or other places of centralized location

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

ARC COMMUNITY DEVELOPMENT
ARC RESEARCH & ANALYTICS
GEORGIA DEPARTMENT OF NATURAL RESOURCE

GEORGIA DEPARTMENT OF NATURAL RESOURCES
CITY OF SOUTH FULTON
COWETA COUNTY

ARC TRANSPORTATION ACCESS & MOBILITY
ARC AGING & HEALTH RESOURCES
GEORGIA DEPARTMENT OF TRANSPORTATION
CITY OF FAIRBURN
FAYETTE COUNTY

ARC NATURAL RESOURCES
GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS
FULTON COUNTY
CITY OF CHATTAHOOCHEE HILLS
TOWN OF TYRONE

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.



Developments of Regional Impact

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

DRI #3020

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: City of Palmetto

Individual completing form: William H. Shell Telephone: 770-463-3377

E-mail: whshell@citypalmetto.com

*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: Palmetto Site

Location (Street Address, South of Roosevelt Highway (US 29/SR 14) in the City of Palmetto, GA GPS Coordinates, or Legal

Land Lot Description):

Brief Description of Project: Proposed warehouse development of approximately 615,600 SF of warehouse

Development Type:

(not selected) OHotels Wastewater Treatment Facilities Office Mixed Use Petroleum Storage Facilities Commercial Airports Water Supply Intakes/Reservoirs Wholesale & Distribution Attractions & Recreational Facilities Intermodal Terminals CHospitals and Health Care Facilities CPost-Secondary Schools Truck Stops Housing OWaste Handling Facilities OAny other development types Industrial Quarries, Asphalt & Cement Plants

If other development type, describe:

Project Size (# of units, floor area, etc.): 615,600 SF of warehouse

Developer: Becknell Services LLC

Mailing Address: 120 East Burlington Avenue

Address 2:

City:La Grange State: IL Zip:60525

Telephone: 708-416-6256

Email: kmills@becknellindustrial.com

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

If yes, property owner: Rick Sewell, Creel Properties LLC

Is the proposed project entirely located within your local government's jurisdiction?

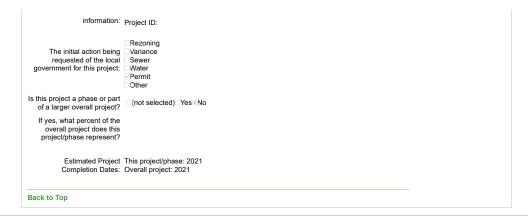
(not selected) Yes No

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

Is the current proposal a continuation or expansion of (not selected) Yes No

a previous DRI? If yes, provide the following Project Name:

11/4/2019, 12:09 PM 1 of 2



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

DRI Site Map | Contact

2 of 2



Developments of Regional Impact

DRI Home

Tier Map

Apply

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DRI #3020

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

Local Government Information

Submitting Local Government: City of Palmetto

Individual completing form: Cynthia Hanson

Telephone: 770-463-3377

Email: hanson@citypalmetto.com

Project Information

Name of Proposed Project: Palmetto Site

DRI ID Number: 3020

Developer/Applicant: Becknell Services LLC

Telephone: 708-416-6256

Email(s): kmills@becknellindustrial.com

Additional Information Requested

Has the RDC identified any additional information required in order to proceed with the official regional review process? (If no,

(not selected) Yes No

proceed to Economic

Impacts.)

If yes, has that additional information been provided to your RDC and, if applicable,

(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-\$28,000,000

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

\$317,250

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

(not selected) Yes No

Will this development displace any existing uses?

project?

(not selected) Yes No

If yes, please describe (including number of units, square feet, etc):

Water Supply

Name of water supply provider for this site:

City of Palmetto

What is the estimated water supply demand to be generated by the project, measured in Millions of Gallons Per Day (MGD)?

0.046

Is sufficient water supply

capacity available to serve the proposed project?

(not selected) Yes No

1/8/2020, 5:22 PM 1 of 3

If no, describe any plans to expand the existing water supply capacity:			
Is a water line extension required to serve this (not selected) Yes No project?			
	line (in miles) will be required?		
	Wastewater Disposal		
Name of wastewater treatment provider for this site:	City of Palmetto		
What is the estimated sewage flow to be generated by the project, measured in Millions of Gallons Per Day (MGD)?	0.055		
Is sufficient wastewater treatment capacity available to serve this proposed project?	○(not selected) Yes No		
If no, describe any plans to e	expand existing wastewater treatment capacity:		
Is a sewer line extension required to serve this project?	(not selected) Yes No		
If yes, how much additional l	ine (in miles) will be required?0.4 miles		
	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.)	1,018 net daily trips. 99 trips AM peak, 102 trips PM peak		
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?	ℂ(not selected)®Yes⊡No		
If yes, please describe below	r:Please refer to the Traffic Study performed by Kimley-Horn and Associates		
	Solid Waste Disposal		
How much solid waste is the project expected to generate			
annually (in tons)? Is sufficient landfill capacity available to serve this	ℂ(not selected)◎ Yes No		
proposed project? If no, describe any plans to e	expand existing landfill capacity:		
Will any hazardous waste be generated by the development?	ℂ(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?			
Describe any measures proposed (such as buffers, detention or retention ponds, pervious parking areas) to mitigate the project's impacts on stormwater management. The proposed development will include stormwater management facilities designed in accordance with the Georgia Stormwater Management Manual			
Environmental Quality			
Is the development located within, or likely to affect any of the following:			
Water supply watersheds?	ℂ(not selected) Yes⊚No		

2 of 3

3. Wetlands? (not selected) Yes No 4. Protected mountains? (not selected) Yes No 5. Protected river corridors? (not selected) Yes No 6. Floodplains? (not selected) Yes No 7. Historic resources? (not selected) Yes No 8. Other environmentally sensitive resources? If you answered yes to any question above, describe how the identified resource(s) may be affected: All work is to be completed under the scope of a Nationwide Permit with the Army Corps of Engineers. This has been coordinated with the City of Palmetto. Back to Top	Significant groundwater recharge areas?	ℂ(not selected) Yes® No
5. Protected river corridors? (not selected) Yes No 6. Floodplains? (not selected) Yes No 7. Historic resources? (not selected) Yes No 8. Other environmentally sensitive resources? If you answered yes to any question above, describe how the identified resource(s) may be affected: All work is to be completed under the scope of a Nationwide Permit with the Army Corps of Engineers. This has been coordinated with the City of Palmetto.	3. Wetlands?	(not selected) Yes No
6. Floodplains? 7. Historic resources? 8. Other environmentally sensitive resources? If you answered yes to any question above, describe how the identified resource(s) may be affected: All work is to be completed under the scope of a Nationwide Permit with the Army Corps of Engineers. This has been coordinated with the City of Palmetto.	4. Protected mountains?	(not selected) Yes No
7. Historic resources? (not selected) Yes®No 8. Other environmentally sensitive resources? (not selected) Yes®No If you answered yes to any question above, describe how the identified resource(s) may be affected: All work is to be completed under the scope of a Nationwide Permit with the Army Corps of Engineers. This has been coordinated with the City of Palmetto.	5. Protected river corridors?	(not selected) Yes No
8. Other environmentally sensitive resources? If you answered yes to any question above, describe how the identified resource(s) may be affected: All work is to be completed under the scope of a Nationwide Permit with the Army Corps of Engineers. This has been coordinated with the City of Palmetto.	6. Floodplains?	(not selected) Yes No
sensitive resources? (not selected) Yes No If you answered yes to any question above, describe how the identified resource(s) may be affected: All work is to be completed under the scope of a Nationwide Permit with the Army Corps of Engineers. This has been coordinated with the City of Palmetto.	7. Historic resources?	(not selected) Yes No
All work is to be completed under the scope of a Nationwide Permit with the Army Corps of Engineers. This has been coordinated with the City of Palmetto.		ℂ(not selected)∵Yes⊚No
Back to Top	All work is to be completed under the scope of a Nationwide Permit with the Army Corps of Engineers. This has been	
	Back to Top	

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

DRI Site Map | Contact

3 of 3



MARK WILLIAMS COMMISSIONER RUSTY GARRISON DIRECTOR

January 17, 2020

Greg Giuffrida Plan Review Technician Atlanta Regional Commission 229 Peachtree Street NE Suite 100 Atlanta, GA 30303

Subject: Known occurrences of natural communities, plants and animals of highest priority conservation status on or near DRI 2030 Palmetto Site, Fulton County, Georgia

Dear Mr. Giuffrida:

This is in response to your request of January 13, 2020. The following Georgia natural heritage database element occurrences (EOs) were selected for the current site using the local HUC10 watershed for elements whose range distribution is limited by aquatic systems (AQ) and within 3 miles for all other EOs (TR).

(-84.652490, 33.528148, WGS84)

- GA *Alasmidonta triangulata* (Southern Elktoe) [Historic] in Line Creek (AQ), approx. 22.0 mi S of site
- GA *Alasmidonta triangulata* (Southern Elktoe) [Historic] in Line Creek (AQ), approx. 20.3 mi SE of site
- GA Cambarus howardi (Chattahoochee Crayfish) in Dog River (AQ), approx. 12.2 mi NW of site
 - Cyclonaias infucata (Sculptured Pigtoe) in Whitewater Creek North of Lake Bennett (AQ), approx. 8.4 mi E of site
 - Cyclonaias infucata (Sculptured Pigtoe) in Keg Creek (AQ), approx. 16.3 mi S of site Cyclonaias infucata (Sculptured Pigtoe) in Whitewater Creek South of Lake Bennettt (AQ), approx. 15.6 mi SE of site
- GA Cyprinella callitaenia (Bluestripe Shiner) in Line Creek (AQ), approx. 8.9 mi S of site
- GA *Cyprinella callitaenia* (Bluestripe Shiner) in Snake River Huc 10 0313000204 (AQ), approx. 13.7 mi W of site
- GA *Cyprinella callitaenia* (Bluestripe Shiner) in Dog River Huc 10 0313000203 (AQ), approx. 16.4 mi NW of site
- GA *Cyprinella callitaenia* (Bluestripe Shiner) [Historic] in Chattahoochee River Huc 10 0313000203 (AQ), approx. 11.0 mi N of site
- GA Elliptio arctata (Delicate Spike) in Line Creek (AQ), approx. 24.9 mi S of site
- GA *Elliptio arctata* (Delicate Spike) in Whitewater Creek Huc 10 0313000502 Line Creek (AQ), approx. 15.6 mi SE of site

- GA Elliptio purpurella (Inflated Spike) in Line Creek (AQ), approx. 21.9 mi S of site
- US *Elliptoideus sloatianus* (Purple Bankclimber) [Historic] in Line Creek (AQ), approx. 20.3 mi SE of site
- GA *Graptemys barbouri* (Barbour's Map Turtle) in Line Creek (AQ), approx. 20.3 mi SE of site
- US *Hamiota subangulata* (Shinyrayed Pocketbook) in Line Creek (AQ), approx. 22.0 mi S of site
- US *Hamiota subangulata* (Shinyrayed Pocketbook) in Line Creek (AQ), approx. 20.3 mi SE of site
 - Lampsilis binominata (Lined Pocketbook) [Historic] in Line Creek (AQ), approx. 20.3 mi SE of site
 - Lythrurus atrapiculus (Blacktip Shiner) [Historic] in Line Creek (AQ), approx. 4.2 mi S of site
- GA *Macrochelys temminckii* (Alligator Snapping Turtle) in Line Creek Nature Area (Huc10 0313000502) (AQ), approx. 9.2 mi S of site
- US *Medionidus penicillatus* (Gulf Moccasinshell) [Historic?] in Line Creek @ SR 16 (AQ), approx. 20.3 mi SE of site
 - *Micropterus cataractae* (Shoal Bass) in Line Creek (AQ), approx. 8.9 mi S of site *Micropterus cataractae* (Shoal Bass) in Wolf Creek Huc 10 0313000203 (AQ), approx.
 - 14.0 mi W of site
 - *Micropterus cataractae* (Shoal Bass) in Dog River Huc 10 0313000203 (AQ), approx. 16.4 mi NW of site
 - Micropterus cataractae (Shoal Bass) [Historic] in Anneewakee Creek (AQ), approx. 9.3 mi N of site
 - *Micropterus chattahoochae* (Chattahoochee Bass) in Two Unnamed Crawfish Creek Tributaries Huc 10 - 0313000203 (AQ), approx. 15.7 mi NW of site
 - *Micropterus chattahoochae* (Chattahoochee Bass) [Historic] in Snake Creek Huc 10 0313000203 Chattahoochee River Lower North 7 (AQ), approx. 14.4 mi W of site
- GA Notropis hypsilepis (Highscale Shiner) in Snake Creek (AQ), approx. 14.3 mi W of site
- GA *Notropis hypsilepis* (Highscale Shiner) in Whitewater Creek Below Starrs Mill Pond (AQ), approx. 15.6 mi SE of site
- GA *Notropis hypsilepis* (Highscale Shiner) in Keaton Creek, Huc 10 0313000203 (Chattahoochee River Lower North 7) (AQ), approx. 17.1 mi NW of site
- GA *Notropis hypsilepis* (Highscale Shiner) [Historic?] in Shoal Creek at Hwy. 34 (AQ), approx. 8.3 mi S of site
- US Pleurobema pyriforme (Oval Pigtoe) in Line Creek (AQ), approx. 9.0 mi S of site
- GA Strophitus radiatus (Rayed Creekshell) in Keg Creek (AQ), approx. 13.9 mi S of site
- GA Strophitus radiatus (Rayed Creekshell) in Whitewater Creek (AQ), approx. 15.6 mi SE of site
 - Villosa villosa (Downy Rainbow) [Historic] in Line Creek (AQ), approx. 15.7 mi SE of site
 - Atlantic Coast Conservancy easement [Atlantic Coast Conservancy] (TR), approx. 2.8 mi N of site
 - Hutcheson Ferry tract [Chattahoochee Hill Country Conservancy] (TR), approx. 2.5 mi W of site
 - Greenspace program acquisition [county] (TR), approx. 0.8 mi W of site

Restrictive covenant [U.S. Army Corps of Engineers] (TR), approx. 2.6 mi E of site Chattahoochee River Lower North 7 (0313000203) [SWAP High Priority Watershed] (TR), on or immediate vicinity of site

Chattahoochee River Lower North 6 (0313000204) [SWAP High Priority Watershed] (TR), approx. 1.1 mi SW of site

Line Creek (0313000502) [SWAP High Priority Watershed] (TR), on site

Recommendations:

Federally listed species have been documented near the proposed project. To minimize potential impacts to federally listed species, we recommend consultation with the United States Fish and Wildlife Service. Please email <u>GAES_Assistance@fws.gov</u> for more information.

Please be aware that state protected species have been documented near the proposed project. For information about these species, including survey recommendations, please visit our webpage at http://georgiawildlife.com/conservation/species-of-concern#rare-locations.

This project occurs within a high priority watershed. As part of Georgia's State Wildlife Action Plan, high priority watersheds were identified to protect the best-known populations of high priority aquatic species, important coastal habitats, and migratory corridors for anadromous species. Please refer to Appendix F of Georgia's State Wildlife Action Plan to find out more specific information about this high priority watershed: https://georgiawildlife.com/wildlifeactionplan.

We are concerned about streams and other habitats that could be impacted by the proposed project. We recommend that stringent erosion control practices be used during construction activities and that vegetation is re-established on disturbed areas as quickly as possible. Silt fences and other erosion control devices should be inspected and maintained until soil is stabilized by vegetation. Please use natural vegetation and grading techniques (e.g. vegetated swales, turn-offs, vegetated buffer strips) that will ensure that the project site does not serve as a conduit for storm water or pollutants into the watershed during or after construction. These measures will help protect water quality near the project as well as in downstream areas.

Please be aware that the type of erosion control material used during construction can impact wildlife. We strongly recommend using natural, biodegradable materials such as 'jute' or 'coir'. Mesh strands should be movable, as opposed to fixed. Use of plastic fencing frequently leads to wildlife entrapment and death.

Disclaimer:

Please keep in mind the limitations of our database. The data collected by the Wildlife Conservation Section comes from a variety of sources, including museum and herbarium records, literature, and reports from individuals and organizations, as well as field surveys by our staff biologists. In most cases the information is not the result of a recent on-site survey by our staff. Many areas of Georgia have never been surveyed thoroughly. Therefore, the Wildlife

Conservation Section can only occasionally provide definitive information on the presence or absence of rare species on a given site. Our files are updated constantly as new information is received. Thus, information provided by our program represents the existing data in our files at the time of the request and should not be considered a final statement on the species or area under consideration.

If you know of populations of highest priority species that are not in our database, please fill out the appropriate data collection form and send it to our office. Forms can be obtained through our web site (http://georgiawildlife.com/conservation/species-of-concern#rare-locations) or by contacting our office. If we can be of further assistance, please let us know.

Laci Pattavina, Wildlife Biologist, Environmental Reviews laci.pattavina@dnr.ga.gov, (706) 557-3228

Data Available on the Wildlife Conservation Section Website

- Georgia protected plant and animal profiles are available on our website. These accounts
 cover basics like descriptions and life history, as well as threats, management
 recommendations and conservation status. Visit
 - http://georgiawildlife.com/conservation/species-of-concern#rare-locations.
- Rare species and natural community information can be viewed by Quarter Quad, County and HUC8 Watershed. To access this information, please visit our GA Rare Species and Natural Community Information page at: http://georgiabiodiversity.org/
- Downloadable files of rare species and natural community data by quarter quad and county are also available. They can be downloaded from:

http://georgiabiodiversity.org/natels/natural-element-locations.html

PALMETTO SITE DRI #3020 City of Palmetto Natural Resources Group Review Comments

January 9, 2020

Water Supply Watershed and Stream Buffer Protection

The proposed project is located within the Line Creek Water Supply watershed, a small (less than 100 square mile) watershed which is a water supply source for both the City of Newnan and Fayette County, both of which are in the Metropolitan North Georgia Water Planning District. The proposed project property is more than 7 miles upstream of both the County and City intakes. The USGS coverage for the project area shows Shoal Creek running along southwestern project property boundary. The submitted site plan also shows two unmapped tributaries to Shoal Creek, one along the southeastern property boundary and the second running off of Shoal Creek into the property.

Under the Georgia Planning Act of 1989, all development in a public water supply watershed is subject to the DNR Part 5 Water Supply Watershed Minimum Criteria (Chapter 391-3-16-.01, Criteria for Water Supply Watersheds) unless alternative criteria are developed and adopted by the jurisdiction according to the requirements of the Part 5 criteria and are then approved by Georgia EPD and DCA. The minimum criteria include: a limit on impervious surface of either 25 percent of the watershed area or the existing amount, whichever is greater; buffer requirements on perennial streams that include a 50-foot undisturbed buffer and 75-foot impervious setback on streams that are more than 7 miles upstream of the closest intake; and other requirements for hazardous materials and hazardous waste. It is our understanding that the City has adopted the Water Supply Watershed Minimum Criteria. The City will need to determine if the proposal meets the requirements of its water supply watershed ordinance.

As stated above, the submitted site plan shows the mapped Shoal Creek along the southwestern boundary of the project property as well as two unmapped tributaries to Shoal Creek. The State 25-foot Sediment and Erosion Control Buffer as well as the 50-foot buffer and 75-foot impervious setback required by both the Part 5 Water Supply Watershed Minimum Criteria and the City of Palmetto's stream buffer ordinance are shown on all three streams on the site plan. A portion of the proposed structure and trailer parking area is shown intruding on the headwaters of the small tributary running into the property, which may require variances for the City and State buffers. No other intrusions are shown. Any other waters of the state that may be on the property will also be subject to the State Sediment and Erosion Control Buffer.

Storm Water/Water Quality

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

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

Palmetto Site DRI #3020, City of Palmetto Natural Resources Group Comments January 9, 2020 Page Two

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

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

Greg Giuffrida

From: Hood, Alan C. <achood@dot.ga.gov>
Sent: Monday, January 20, 2020 2:12 PM

To: Greg Giuffrida

Cc: Brian, Steve; Comer, Carol; Edmisten, Colette; Robinson, Joseph **Subject:** RE: ARC DRI Review Notification - Palmetto Site (DRI #3020)]

Attachments: ARC Preliminary Report - Palmetto Site DRI 3020.pdf

Greg,

The proposed warehouse development of approximately 615,600 SF in the City of Palmetto, is on 57.41-acre site along the south side of Roosevelt Highway (US 29/SR 14), east of Phipps Road, west of Bowen Road, and north of Johnson Road. It is located more than 10 miles from any civil airport and is located outside any FAA approach or departure surfaces, and airport compatible land use areas, and does not appear to impact any airport.

However, the proposed development is 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.

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
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404.660.3394 cell
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From: Greg Giuffrida < GGiuffrida@atlantaregional.org>

Sent: Monday, January 13, 2020 2:52 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 <juhatch@dot.ga.gov>; Hood, Alan C. <achood@dot.ga.gov>; Johnson, Lankston <lajohnson@dot.ga.gov>; jon.west@dca.ga.gov; Zahul, Kathy <kzahul@dot.ga.gov>; 'kclark@gefa.ga.gov'; Matthews, Timothy W <TMatthews@dot.ga.gov>; McLoyd, Johnathan G <JoMcLoyd@dot.ga.gov>; Mertz, Kaycee <kmertz@dot.ga.gov>; Montefusco, Joshua M <JMontefusco@dot.ga.gov>; 'nongame.review@dnr.ga.gov'; 'nrogers@dot.ga.gov'; pmartin@srta.ga.gov; pemmanuel@srta.ga.gov; 'PPeevy@dot.ga.gov'; Regis, Edlin <eregis@dot.ga.gov>; Robinson,



regional impact + local relevance

Development of Regional Impact

Assessment of Consistency with the Regional Transportation Plan

DRI INFORMATION

DRI Number #3020

DRI Title Palmetto Site

County Fulton County

City (if applicable) Kennesaw

Address / Location 57-acre site which is located along the south side of Roosevelt Highway (US 29/SR 14), east of Phipps Road, west of Bowen Road, and north of Johnson Road

NON-EXPEDITED

The proposed development is a 634,500 square foot warehouse/distribution center on approximately 57.41 Acres.

REVIEW INFORMATION

Prepared by ARC Transportation Access and Mobility Division

Staff Lead Marquitrice Mangham

Copied Click here to enter text.

Date January 13, 2020

TRAFFIC STUDY

Prepared by Kimley Horn

Date January 6, 2020

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 date of RTP project list used below and the page number of the traffic study where relevant projects are identified)
NO (provide comments below)
No traffic study was completed or required due to trip generation allowing for expedited review (less than 3000 trips per day).
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 No
YES (identify the roadways and existing/proposed access points)
The site plan identifies one access point on Bowen 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.

\times	NO
	YES (identify the roadways and existing/proposed access points)
	The site plan identifies one access point on Bowen Road.

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.

\times	NOT APPLICABLE (nearest station more than one mile away)	
	RAIL SERVICE WITHIN ONE MILE (provide additional information below)	
	Operator / Rail Line	Marta Rail
	Nearest Station	Vine city Station
	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)
\boxtimes	NO (no plans exist to provide rail service in the general vicinity)
	YES (provide additional information on the timeframe of the expansion project below)
	CST planned within TIP period
	CST planned within first portion of long range period
	CST planned near end of plan horizon

Click 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 (neare	st bus, shuttle or circulator stop more than one mile away)
\boxtimes	SERVICE WITHIN ONE M	ILE (provide additional information below)
	Operator(s)	MARTA
	Bus Route(s)	180
	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)
		Sidewalk currently exist along some stretches of Roosevelt Highway adjacent to the site. Bowen Road has no pedestrian facilities.
	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.	Does a transit agency which provides rail and/or fixed route bus service operate anywhere with	ıir
	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
MAI	RTA #180

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

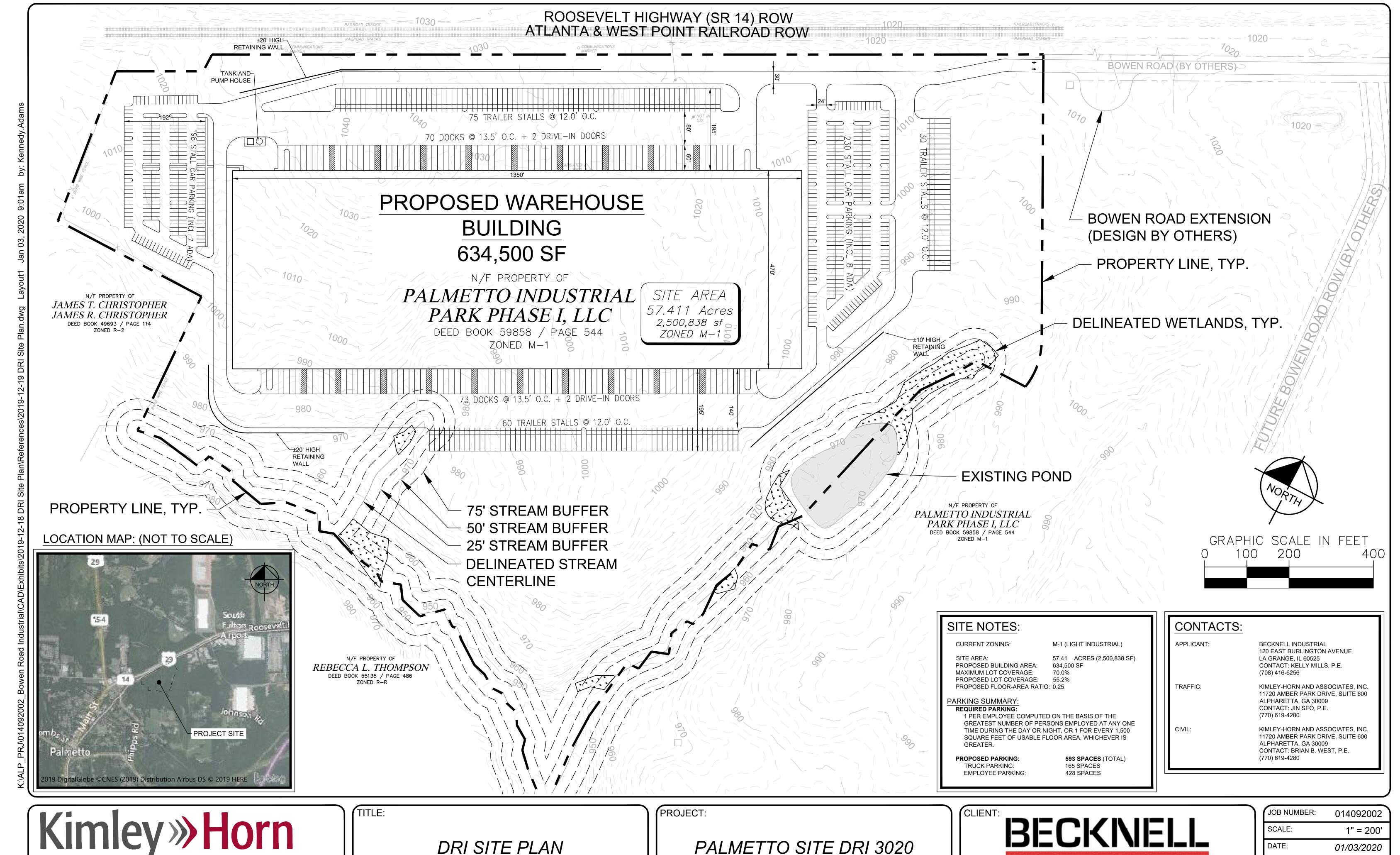
Access between major developments and walking/bicycling facilities provide options for people who cannot or prefer not to drive, expand economic opportunities by better connecting people and jobs, and can help reduce traffic congestion. If connectivity with a regionally significant path or trail is available 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 (neare	st path or trail more than one mile away)
YES (provide additional i	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
	D = 0

	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
	TRANSPORTATION DESIGN CONSIDERATIONS Does the site plan provide for the construction of publicly accessible roadway connections with
	adjacent parcels?
	The ability for drivers and bus routes to move between developments without using the adjacent roadway network 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)
	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 roadway connections)
	Access to adjacent parcels are provided through Bowen Road, a local road.
10.	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)

	s the site plan provide the ability to construct publicly accessible bicycling and walking nections with adjacent parcels which may be redeveloped in the future?
re op	te ability for walkers and bicyclists to move between developments safely and conveniently duces reliance on vehicular trips, which has congestion reduction and health benefits. Such portunities should be considered and proactively incorporated into development site plans henever possible.
	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)
Clic	ck here to provide comments.
The of are see	the flow of pedestrians, bicyclists and motorists both within the site and on the surrounding dinetwork? The ability for delivery and service vehicles to efficiently enter and exit major developments is sten key to their economic success. So is the ability of visitors and customers being able to move ound safely and pleasantly within the site. To the extent practical, truck movements should be gregated by minimizing the number of conflict points with publicly accessible internal roadways,
SIC	dewalks, 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 primar 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)
The	development offers a shared access point for vehicles and freight traffic.
COMME	NDATIONS
	the transportation network recommendations outlined in the traffic study appear to be feasible naconstructability standpoint?
	UNKNOWN (additional study is necessary)

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



Kimley» Horn 11720 AMBER PARK DRIVE, SUITE 600, ALPHARETTA, GEORGIA 30009

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DRI SITE PLAN

BECKNELL NDUSTRIAL

01/03/2020 EXHIBIT A