

DATE: July 28, 2020

ARC REVIEW CODE: R2007101

TO: Chairman Mike Boyce  
ATTN TO: Jeannie Peyton, Planner  
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:** Cumberland Mall (DRI #3129)

**Submitting Local Government:** Cobb County

**Review Type:** Development of Regional Impact **Date Opened:** July 10, 2020 **Date Closed:** July 28, 2020

**Description:** A Development of Regional Impact (DRI) review of a proposed mixed-use and transit-oriented project at a portion of the Cumberland Mall site in unincorporated Cobb County. The 13.5-acre site covers the eastern half of the property, bound by Cobb Parkway (US 41 /SR 3) to the north, Akers Mill Road to the east, and Cumberland Boulevard to the south. The development proposes 445,000 SF of office, 312 multifamily residential units, 31,200 SF of retail/restaurant, a 9,000 SF fire station, and a transit station with 10 bus bays for the planned Connect Cobb Arterial Rapid Transit (ART) project (ARC Project #AR-475). The local trigger is a rezoning. Expected buildout is 2025.

**Comments:** According to the ARC Unified Growth Policy Map (UGPM), part of The Atlanta Region's Plan, this DRI is located in a Regional Employment Corridor as well as a Regional Center. ARC's Regional Development Guide (RDG) details recommended policies for areas on the UGPM. General information and policy recommendations for Regional Employment Corridors and Regional Centers are listed at the bottom of this report.

This DRI appears to manifest many aspects of regional policy. It generally supports the goals of the Livable Centers Initiative (LCI) program in that it converts a portion of a car-oriented shopping mall parking lot into an infill, mixed-use center integrated with a future transit center to serve existing and future bus service provided by Cobb Linc, MARTA, GRTA, and other circulators. Many of these characteristics will collectively offer the potential for site residents to work and shop on site, and for workers and visitors to park once or

arrive via alternative transportation modes and conduct multiple trips on foot. The site is also adjacent to several other job centers in the existing mall and surrounding office buildings.

Care should be taken to ensure that the development promotes a functional, safe, clearly marked and comfortable pedestrian experience on all streets, paths and parking areas. During the Pre-Review meeting for this project held on May 11, 2020, several issues were raised regarding the pedestrian network throughout the project, and especially the lack of clear pathways for users of the transit center to and from the surrounding sidewalks and buildings. Some improvements have been made on the submitted site plan, including the following:

- Adding sidewalks on the western side of the internal street from Mall Access B between Phase One and Phase Three.
- Converting the internal street that runs east-west between Phase 3 and the existing mall to diagonal parking, to allow more room for sidewalk and a more traditional urban street.
- Introducing a clear pedestrian path from the existing mall to the transit area, with crossings to the boarding island.

The proposed site plan now introduces a pedestrian bridge across Cumberland Boulevard to connect to the existing Silver Comet Cumberland Connector trail on the south side of the road. This option was not considered in previous discussions about the project and it's not clear from the site plan how a fully ADA-accessible bridge would be built on either side and integrated with Phase 3. This is a major infrastructure investment that will require several millions of dollars and thoughtful design to be an effective and attractive amenity. Pedestrian bridges can have the negative effect of removing pedestrians from the street environment and introducing security concerns. If it's not designed in such a way that is convenient and intuitive, then pedestrians, cyclists, and other trail users may not use it.

The proposed development is located in the Cumberland LCI area (Cumberland Blueprint 3.0 from 2017) and is, in ARC's view, partially consistent with that study's goals and recommendations. This plan serves as the justification for this DRI's expedited review. This site falls in the "Core" subarea, which states: Higher-density, pedestrian-oriented buildings will rise from areas of surface parking; continued streetscape and crosswalk improvements will support mobility choices for all users; a green multi-use trail loop will provide improved pedestrian and bike access to adjacent subareas and the river; and a relocated transit hub near the expressway will prepare Cumberland for enhanced transit service while encouraging more area residents, employees, and visitors to use transit and walk.

The Cumberland Blueprint plan identifies the need for a new transit transfer location in the Cumberland area and identifies two potential locations near interstates. This DRI location is not one of them, but if an interstate ramp were added at Cobb Parkway, this site would be better situated for interstate access. During the Pre-Review meeting and a followup meeting to discuss the transit center, concerns were raised about whether operations staff from the relevant transit providers were consulted in the design of the bus loop. It appears that several changes were made to the bus loop on this basis, but ongoing cooperation among the transit agencies will be necessary to make sure the transit center is functional for current service and the proposed Connect Cobb Bus Rapid Transit service contained in the region's Transportation Improvement

Program (TIP project AR-475). Additional comments from ARC Transportation Access & Mobility Group and GDOT's aviation division are attached.

Another recommendation in Cumberland Blueprint notes the importance of strong design standards when attempting to convert auto-oriented uses into a more urban context. It recommends the establishment of design guidelines for the district and an "on-call" consultant to advise on these matters. The proposed rezoning to RRC – Regional Retail Commercial brings it with it required setbacks and other requirements that may be at odds with the Blueprint's stated goals of street-oriented development and a high-quality public realm. All three phases appear at a glance to be compatible with the requirements of local zoning, but may require additional attention to design to accomplish the Blueprint's stated goals.

It's clear there is a need for all parties involved in the project to seek a higher level of urban design for this location, given the local government's intent to use federal transportation funding for the transit center portion of the project. It's beyond the regulatory capability of the Atlanta Regional Commission's role in the DRI process to address these design challenges in a more assertive way, but it's clear that greater attention to urban design and function is needed given the scale of federal transit investment that is proposed. Helpful guidance for Transit-Oriented Developments is contained in MARTA's TOD guidelines available here: <https://itsmarta.com/tod.aspx>. Additional resources for best practices in TOD development are available through ARC here: <https://atlantaregional.org/community-development/comprehensive-planning/transit-oriented-development>.

The project could further support The Atlanta Region's Plan in general if it incorporated other aspects of regional policy, including green infrastructure and/or low-impact design (e.g., rain gardens, vegetated swales, etc.) as part of any improvements to streetscapes, driveways, parking areas, buildings, etc. Additional comments from ARC's Natural Resources Group are attached to this report. They note that the project is outside the 2,000-foot Chattahoochee River Corridor, but it is upstream of Peachtree Creek, which places it in the portion of the Chattahoochee River watershed that is also a large water supply watershed (over 100 square miles), as defined under the Part 5 Criteria of the 1989 Georgia Planning Act.

The intensity of this proposed project generally aligns with the RDG's recommended range of densities and building heights in Regional Employment Corridors. The proposed land use mix and design support the RDG's recommendations in terms of encouraging infill development and housing options.

Further to the above, Regional Employment Corridors, along with the Region Core (Downtown, Midtown and Buckhead), form the densest part of the Atlanta region. Connected with transit, this area of the region is typically the most walkable, and redevelopment is the main driver of its growth. The Region Core and Regional Employment Corridors together contain 26 percent of the 10-county region's jobs and eight percent of region's population on approximately 2.25 percent of the region's land area. Regional policy recommendations for Regional Employment Corridors include:

- Continue to invest in the LCI program to assist local governments in center planning and infrastructure.
- Prioritize preservation of existing transit, increase frequency and availability of transit options.
- Encourage compact infill development, redevelopment and adaptive reuse.
- Create a range of housing options to accommodate all sectors of the workforce.

- Encourage active ground floor, pedestrian scale design, and pedestrian amenities in new development and the redevelopment of existing sites

Further to the above, Regional Centers are metro Atlanta's centers for employment, shopping and entertainment. These centers should be connected to the regional transportation network with existing or planned high-capacity transit service. In most cases, these centers have a jobs-housing imbalance, so housing options should be expanded within their boundaries, especially around existing or planned transit. Regional policy recommendations for Regional Centers include:

- Prioritize preservation, expansion and access to existing and planned transit systems and improve the quality and aesthetics of existing facilities.
- Incorporate appropriate end-of-trip facilities, such as bicycle racks and showers/locker rooms, within new and existing development.
- Enhance mobility and accessibility for all by creating Complete Streets that accommodate all modes of transportation.
- Encourage active ground floor, pedestrian-scale design and pedestrian amenities in new development and redevelopment of existing sites.
- Work toward improving the jobs-housing imbalance in Regional Centers and promote housing options to accommodate multiple household sizes and price points in close proximity to jobs.
- Use alternative designs and materials to minimize impervious surfaces to the greatest possible extent.

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

ARC COMMUNITY DEVELOPMENT	ARC TRANSPORTATION ACCESS & MOBILITY	ARC NATURAL RESOURCES
ARC RESEARCH & ANALYTICS	ARC AGING & HEALTH RESOURCES	GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS
GEORGIA DEPARTMENT OF NATURAL RESOURCES	GEORGIA DEPARTMENT OF TRANSPORTATION	GRTA/SRTA
MARTA	CITY OF SMYRNA	FULTON COUNTY
CITY OF SANDY SPRINGS	CITY OF ATLANTA	

If you have any questions regarding this review, please contact Greg Giuffrida at (470) 378-1531 or [ggiuffrida@atlantaregional.org](mailto:ggiuffrida@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 #3129

#### 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: Cobb

Individual completing form: Jeannie Peyton

Telephone: 770-528-2022

E-mail: [jeannie.peyton@cobbcounty.org](mailto:jeannie.peyton@cobbcounty.org)

\*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: Cumberland Mall

Location (Street Address, 2940 Cobb Parkway SE (former Sears address)  
GPS Coordinates, or Legal  
Land Lot Description):

Brief Description of Project: This is a phased mixed use development at the eastern portion of the Cumberland Mall site. (Phase 1-3 approx. 14 acres, see site plan)

#### Development Type:

- |  |   |   |
|--|---|---|
| <input type="radio"/> (not selected)                       | <input type="radio"/> Hotels                                | <input type="radio"/> Wastewater Treatment Facilities |
| <input type="radio"/> Office                               | <input checked="" 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 type="radio"/> Industrial                           | <input type="radio"/> Quarries, Asphalt & Cement Plants     |   |

If other development type, describe:

Project Size (# of units, floor area, etc.): 445,000 SF office; 312 multifamily residential units; 31,200 SF retail/restaurant; 10 bus bay; and 9

Developer: Charles Tapia, RVP - Brookfield Properties

Mailing Address: 350 N. Orleans Street, Suite 300

Address 2:

City: Chicago State: IL Zip: 60654

Telephone: 312-960-5729

Email: [Charles.Tapia@brookfieldpropertiesretail.com](mailto:Charles.Tapia@brookfieldpropertiesretail.com)

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

If yes, property owner: CUMBERLAND MALL, LLC & GS PORTFOLIO HOLDINGS (2017) LLC C/O WESTROADS-OAKS, INC.

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 Project Name:

information: Project ID:

The initial action being  
requested of the local  
government for this project:

- ☒ Rezoning  
☐ Variance  
☐ Sewer  
☐ Water  
☐ Permit  
☐ Other

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 Dates: This project/phase: 2025  
Overall project: 2025

[Back to Top](#)

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## Developments of Regional Impact

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### DRI #3129

#### 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: Cobb

Individual completing form: Jeannie Peyton

Telephone: 770-528-2022

Email: jeannie.peyton@cobbcounty.org

#### Project Information

Name of Proposed Project: Cumberland Mall

DRI ID Number: 3129

Developer/Applicant: Charles Tapia, RVP - Brookfield Properties

Telephone: 312-960-5729

Email(s): Charles.Tapia@brookfieldpropertiesretail.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: \$350,000,000

Estimated annual local tax revenues (i.e., property tax, sales tax) likely to be generated by the proposed development: \$17,500,000

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):

An approximately 25,000 SF vacant auto repair shop will be demolished.

#### Water Supply

Name of water supply provider for this site: Cobb County Water System

What is the estimated water supply demand to be generated by the project, measured in Millions of Gallons Per Day (MGD)? 0.247 MGD

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:

Cobb County Water System

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

0.205 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.)

10,466 net daily trips; 991 net AM trips, 1,077 net PM trips

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:

Please refer to traffic study prepared by Kimley-Horn and Associates.

### Solid Waste Disposal

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

2,693 tons

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 87% of new project area will be impervious withi

Describe any measures proposed (such as buffers, detention or retention ponds, pervious parking areas) to mitigate the project's impacts on stormwater management:

Underground stormwater chambers, drainage/treatment swales, etc.

### Environmental Quality

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

1. Water supply watersheds? ☐ (not selected) ☐ Yes ☒ No

2. Significant groundwater recharge areas? ☐ (not selected) ☐ Yes ☒ No

3. Wetlands? ☐ (not selected) ☐ Yes ☒ No

4. Protected mountains? ☐ (not selected) ☐ Yes ☒ No



5. Protected river corridors?

☐ (not selected) ☒ Yes ☐ No

6. Floodplains?

☐ (not selected) ☒ Yes ☐ No

7. Historic resources?

☐ (not selected) ☒ Yes ☐ No

8. Other environmentally sensitive resources?

☐ (not selected) ☒ Yes ☐ No

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

Submit Application

Save without Submitting

Cancel

[Back to Top](#)

## Greg Giuffrida

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**From:** Hood, Alan C. <achood@dot.ga.gov>  
**Sent:** Tuesday, July 21, 2020 12:00 PM  
**To:** Greg Giuffrida  
**Cc:** Brian, Steve; Comer, Carol; Edmisten, Colette; Robinson, Joseph  
**Subject:** RE: ARC DRI Review Notification - Cumberland Mall DRI #3129  
**Attachments:** ARC Preliminary Report - Cumberland Mall DRI 3129.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Greg,

The proposed mixed-use and transit-oriented project at a portion of the Cumberland Mall site in unincorporated Cobb County. The 13.5-acre site covers the eastern half of the property, bound by Cobb Parkway (US 41/SR 3) to the north, Akers Mill Road to the east, and Cumberland Boulevard to the south. The development proposes 445,000 SF of office, 312 multifamily residential units, 31,200 SF of retail/restaurant, a 9,000 SF fire station, and a transit station with 10 bus bays for the planned Connect Cobb Arterial Rapid Transit (ART) project. It is more than 7 miles from any open-to-the-public 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 for the buildings and any associated cranes 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

6<sup>th</sup> Floor

Atlanta, GA, 30308

404.660.3394 cell

404.532.0082 office

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**From:** Greg Giuffrida <GGiuffrida@atlantaregional.org>  
**Sent:** Friday, July 10, 2020 5:15 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

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

### DRI INFORMATION

**DRI Number** #3129

**DRI Title** Cumberland Mall

**County** Cobb County

**City (if applicable)** Marietta

**Address / Location** west of Akers Mill Road, north of Cumberland Boulevard, and south of Cobb Parkway (US 41/SR 3), adjacent to the vacant Sears anchor store

**Review Process** ☒ EXPEDITED  
☐ NON-EXPEDITED

**Proposed Use:** 312 residential units, 445,000 sq ft office, and 31,200 sq ft of retail/restaurant land uses with transit-oriented accommodations

### REVIEW INFORMATION

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

**Staff Lead** Marquitrice Mangham

**Copied** [Click here to enter text.](#)

**Date** July 14, 2020

### TRAFFIC STUDY

**Prepared by** Kimley Horn

**Date** July 1, 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*)

The traffic analysis identifies planned programmed projects in Table 10 on page 23.

## **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*)

The site plan identifies one proposed access point on Akers Mill Rad, US 41/SR 3 Cobb Parkway and .Cumberland Blvd. Cobb Parkway. SR 3 is designated as a regional thoroughfare.

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

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

☐ NO

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

The site plan shows proposed access on SR 3 Cobb Parkway, a regional Truck Route

**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 [Click here to enter name of operator and rail line](#)

Nearest Station [Click here to enter name of 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*)
- ☒ 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

**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) COBB Linc, GRTA

Bus Route(s) 10, 20, 25 50

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 Stanley Road however sidewalk facilities along Cobb International are incomplete adjacent to the proposed development site.

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 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

Cobb Linc, GRTA

**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 (nearest path or trail more than one mile away)

☐ YES (provide additional information below)

Name of facility Silver Comet Trail proposed along Cumberland Blvd

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*)

## **OTHER TRANSPORTATION DESIGN CONSIDERATIONS**

### **09. 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 proposed development is bounded by major collectors and arterial roadways on 3 sides and a local road to the west. .

### **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*)

. Pedestrian facilities are proposed throughout the development.

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

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

Bicycle and Pedestrian facilities currently exists along Cumberland Blvd and Cobb Parkway adjacent to the site.

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

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

## **RECOMMENDATIONS**

**13. Do the transportation network recommendations outlined in the traffic study appear to be feasible from a constructability standpoint?**

- ☐ UNKNOWN *(additional study is necessary)*
- ☒ YES *(based on information made available through the review process; does not represent a thorough engineering / financial analysis)*
- ☐ NO *(see comments below)*

Click here to enter text.

**14. Is ARC aware of any issues with the development proposal which may result in it being opposed by one or more local governments, agencies or stakeholder groups?**

- ☒ NO *(based on information shared with ARC staff prior to or during the review process; does not reflect the outcome of an extensive stakeholder engagement process)*
- ☐ YES *(see comments below)*

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

Funding for a new transit station was awarded to Cobb County as apart of the 2019 TIP solicitation. Project coordination is recommended between the two projects.

**CUMBERLAND MALL DRI**  
**Cobb County**  
**Natural Resources Group Review Comments**  
**July 7, 2020**

While ARC and the Metropolitan North Georgia Water Planning District have no regulatory or review authority over this project, the Natural Resources Group has identified County and State regulations that could apply to this property. Other regulations may also apply that we have not identified.

**Watershed Protection**

The proposed project is in the Chattahoochee Corridor watershed, but it is not within the 2000-foot Chattahoochee River Corridor and is not subject to the requirements of the Metropolitan River Protection Act or the Chattahoochee Corridor Plan. The project property is upstream of Peachtree Creek, which places it in the portion of the Chattahoochee River watershed that is also a large water supply watershed (over 100 square miles), as defined under the Part 5 Criteria of the 1989 Georgia Planning Act. For large water supply watersheds without a water supply reservoir, the only applicable Part 5 requirements are restrictions on hazardous waste handling, storage and disposal within seven miles upstream of a public water supply intake. This property is within seven miles upstream of the nearest public water supply intake.

**Stream Buffers**

The USGS coverage for the project area shows no streams on or near the property. No streams or other waters of the State are shown on the submitted site plan and no evidence of streams or other waters is visible in available aerial photo coverage. Any unmapped streams identified on the property may be subject to Cobb County's stream buffer ordinance. Any unmapped State waters identified on the property will be subject to the State 25-foot Sediment and Erosion Control buffer.

**Stormwater/Water Quality**

The project should adequately address the impacts of the proposed development on stormwater runoff and downstream water quality.

During the planning phase, the stormwater management system (system) should meet the requirements of the local jurisdiction's post-construction (or post-development) stormwater management ordinance. The system should be designed to prevent increased flood damage, streambank channel erosion, habitat degradation and water quality degradation, and enhance and promote the public health, safety and general welfare. The system design should also be in accordance with the applicable sections of the Georgia Stormwater Management Manual ([www.georgiastormwater.com](http://www.georgiastormwater.com)) such as design standards, calculations, formulas, and methods. Where possible, the project should use stormwater better site design practices included in the Georgia Stormwater Management Manual, Volume 2, Section 2.3.

During construction, the project should conform to the relevant state and federal erosion and sedimentation control requirements.



