

REGIONAL REVIEW NOTIFICATION

Atlanta Regional Commission • 229 Peachtree Street NE | Suite 100 | Atlanta, Georgia 30303 • ph: 404.463.3100 fax: 404.463.3205 • atlantaregional.org

DATE: July 10, 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 Review



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Original on file

The Atlanta Regional Commission (ARC) has completed a preliminary 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 preliminary report does not address whether the DRI is or is not in the best interest of the local government.

Name of Proposal: Cumberland Mall (DRI #3129)

Review Type: DRI

Submitting Local Government: Cobb County

Date Opened: July 10, 2020

Deadline for Comments: July 25, 2020 **Date to Close:** July 25, 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.

PRELIMINARY 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 for users, 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).

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.

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 RESEARCH & ANALYTICS
GEORGIA DEPARTMENT OF NATURAL RESOURCES
MARTA
CITY OF SANDY SPRINGS

ARC TRANSPORTATION ACCESS & MOBILITY
ARC AGING & HEALTH RESOURCES
GEORGIA DEPARTMENT OF TRANSPORTATION
CITY OF SMYRNA
CITY OF ATLANTA

ARC NATURAL RESOURCES
GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS
GRTA/SRTA
FULTON COUNTY

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>.



DEVELOPMENT OF REGIONAL IMPACT REQUEST FOR COMMENTS

Instructions: The project described below has been submitted to this Regional Commission for review as a Development of Regional Impact (DRI). A DRI is a development of sufficient scale or importance that it is likely to generate impacts beyond the jurisdiction in which the project is located, for example in adjoining cities or neighboring counties. We would like to consider your comments on this proposed development in our DRI review process. Therefore, please review the information about the project included in this packet and offer your comments in the space provided. The completed form should be returned to ARC on or before the specified return deadline.

Preliminary Findings of the RDC: **Cumberland Mall (DRI #3129)** *See the Preliminary Report.*

Comments from affected party (attach additional sheets as needed):

Individual Completing Form:

Local Government:

Department:

Telephone: ()

Signature:

Date:

Comments must be emailed to:

Greg Giuffrida
Atlanta Regional Commission
ggiuffrida@atlantaregional.org
Ph. (470) 378-1531

Return Date: July 25, 2020

DATE: July 10, 2020

TO: ARC Group Managers

Reviewing staff by Jurisdiction:

Community Development: Giuffrida, Greg

Transportation Access and Mobility: Mangham, Marquitrice

Natural Resources: Santo, Jim

Research and Analytics: Skinner, Jim

Aging and Health Resources: Perumbeti, Katie

Name of Proposal: Cumberland Mall (DRI #3129)

Review Type: Development of Regional Impact

Description: 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.

Submitting Local Government: Cobb County

Date Opened: July 10, 2020

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- 1) ☐ Proposal is CONSISTENT with the following regional development guide listed in the comment section.
- 2) ☐ While neither specifically consistent nor inconsistent, the proposal relates to the following regional development guide listed in the comment section.
- 3) ☐ While neither specifically consistent nor inconsistent, the proposal relates to the following regional development guide listed in the comment section.
- 4) ☐ The proposal is INCONSISTENT with the following regional development guide listed in the comment section.
- 5) ☐ The proposal does NOT relate to any development guide for which this division is responsible.
- 6) ☐ Staff wishes to confer with the applicant for the reasons listed in the comment section.

COMMENTS:

[illegible]



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

*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

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

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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:

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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) 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.

