

DATE: Nov. 30, 2020

ARC REVIEW CODE: R2011131

TO: Chairman Ramona Jackson Jones
ATTN TO: Phil Shafer, Zoning Administrator
FROM: Douglas R. Hooker, Executive Director
RE: Development of Regional Impact (DRI) Review



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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: Riverview Site (DRI #3095)

Submitting Local Government: Douglas County

Review Type: Development of Regional Impact **Date Opened:** Nov. 13, 2020 **Date Closed:** Nov. 30, 2020

Description: A Development of Regional Impact (DRI) review of a proposed 798,000 SF distribution warehouse located on an undeveloped site on the south side of Fairburn Road (SR 154) in unincorporated Douglas County. Access would be provided with a new driveway intersecting Fairburn Road at Valley Road. The total site area is 154.42 acres, with 56.32 acres of disturbed area for a final impervious surface of 36.2 acres. Expected buildout is 2023.

Comments: According to the ARC Unified Growth Policy Map (UGPM), part of The Atlanta Region's Plan, this DRI is in a Developing Suburbs area. ARC's Regional Development Guide (RDG) details recommended policies for areas and places on the UGPM. General RDG information and recommendations for Developing Suburban areas are listed at the bottom of these comments. In addition, we have listed recommendations for Regional Industrial & Logistics Areas, which is becoming a significant use in this area.

This DRI manifests certain aspects of regional policy. It offers the potential for efficiencies and connectivity in intraregional, interregional and interstate freight movement given its accessibility to Fairburn Road/Campbellton Road (SR 166) and Thornton Road/Camp Creek Parkway (SR 6), and I-20 and Fulton Industrial Boulevard (SR 70) beyond that. Although this location is not currently considered an Industrial & Logistics Area in The Atlanta Region's Plan, the growing number of distribution/warehouse facilities along Riverside Parkway and the nearby Fulton Industrial corridor requires considering these logistical issues.

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.

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 site is located in a "Workplace Center" character area of the 2018 Douglas County Comprehensive Plan, which is described as: "Intensive commercial retail and services, office, and high tech development along major highway corridors that are considered major employment generators with an emphasis on landscaping and aesthetics. Integrated office parks are highly encouraged. Residential developments are also encouraged to be integrated into the overall design." While industrial parks with integrated urban design are listed as an encouraged use, the proposed DRI appears to be better suited to the development pattern and standards described in the County's "Commerce Center" character area. Please see the attached comments submitted by the City of South Fulton expressing concern about introducing an industrial use at this location and the projected increase in truck traffic on Fairburn Road.

About 43 acres of the total site area lies within the Chattahoochee River Corridor, which will require a separate, upcoming review under the Metropolitan River Protection Act (MRPA). Based on initial discussions with ARC's Natural Resources Group, the plans as submitted for this DRI should meet the standards for MRPA, but that will ultimately be determined in the separate review. The site is downstream from the portion of the Chattahoochee River that serves as a water supply source for the Atlanta region. ARC staff also notes there are streams on the property that may require local variances. Please see the attached comments for more details.

Another relevant regional issue was raised during earlier iterations of this DRI earlier in 2020, when an additional proposed building could have conflicted with the proposed alignment of the first segment of the Chattahoochee River Greenway Trail, which is a federally funded project in the ARC's Transportation Improvement Program (TIP). The trail network would connect Boundary Waters Park in the south to Sweetwater Creek State Park in the north and is identified as a priority in the 2008 Douglas County Comprehensive Transportation Plan, the current 2018 Douglas County Comprehensive Plan, and the Regional Transportation Plan. The DRI as submitted for this review does not appear to conflict with the potential trail alignment. Additional comments from ARC's Transportation Access & Mobility Group are attached.

The underlying area for this location falls under the Developing Suburban category of the Unified Growth Policy Map. They are areas of residential development that were constructed from around 1995 to today and are projected to remain suburbs through 2040. Recommendations 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

These don't fully address the relevant issues with this DRI, so the following RDG recommendations are offered from the Regional Industrial & Logistics section, defined as areas that will see increased job growth in the form of industrial and logistics space. Strategies are needed to avoid residential and industrial conflicts while still allowing both uses in proximity to each other, without limiting the operations of industrial land users. Recommendations include:

- Protect Industrial and Logistics Areas by not allowing conflicting land uses in the vicinity
- Identify key areas to preserve for freight and industrial uses
- Continue to promote Industrial and Logistics Areas as a major resource in recruiting future economic development prospects to the region
- Ensure the continued efficiency of cargo and freight transport with easy connectivity to trucking and shipping routes through the region

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
CITY OF DOUGLASVILLE	FULTON COUNTY	CITY OF SOUTH FULTON
CHATTAHOOCHEE RIVERKEEPER	GEORGIA CONSERVANCY	

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: **Riverview Site (DRI #3095)** *See the Preliminary Report.*

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

City of South Fulton would like to make a note of concerns of increasing truck traffic on Fairburn Rd before trucks are diverted to Fulton Industrial Blvd on their way to I-20.

Our Future Land Use Map has the area of Fairburn Rd in South Fulton marked as residential (Rural Neighborhood), and acknowledges there would be an impact on the future residents of the area by nearby Industrial development.

Individual Completing Form:

Nathan Mai-Lombardo, Planning and Zoning Administrator

Local Government:

South Fulton

Department:

Planning and Zoning

Telephone: ()

470-898-8363 (cell)

Signature:

Date:

Comments must be emailed to:

Greg Giuffrida

Atlanta Regional Commission

ggiuffrida@atlantaregional.org

Ph. (470) 378-1531

Return Date: Nov. 28, 2020

RIVERVIEW SITE DRI
Douglas County
Natural Resources Group Review Comments
November 13, 2020

Chattahoochee River Corridor

Approximately 43.03 acres of the property is in the 2000-foot Chattahoochee River Corridor. A portion of the proposed project is within the Corridor and is subject to the requirements of the Metropolitan River Protection Act and the Chattahoochee Corridor Plan. A review of the portion of the project in the Corridor will be required to determine consistency with the Chattahoochee Corridor Plan. The applicant has been working with Natural Resources staff in preparation for that review. The portion of the project in the Corridor should meet Plan standards if the formal submission is the same as the preliminary plans.

Other Regulations:

While ARC and the Metropolitan North Georgia Water Planning District have no regulatory or review authority over other aspects of 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 and Stream Buffers

The entire project property is located in the Chattahoochee River watershed. It is downstream of the portion of the Chattahoochee that serves as a water supply source in the Atlanta Region.

The USGS coverage for the project area shows an unnamed blue-line stream in the southwest portion of the property. The site plan submitted to Natural Resources shows this stream, along with two unmapped tributary running north on the east and west sides of the proposed construction site. The County's 50-foot stream buffer and additional 25-foot impervious setback, as well as the State 25-foot State Erosion and Sedimentation Control buffer are shown on all streams on the submitted site plan. The site plans show some grading proposed in the 25-foot impervious setback on the mapped blue-line stream and the unmapped stream on the west side of the construction site. A portion of a truck court intrudes on the unmapped stream on the east side of the project. These intrusions into the County buffer and setback may require a variance under the County Stream Buffer Ordinance. Any intrusions into the State 25-foot State Erosion and Sedimentation Control may also require variances. Any unmapped State waters identified on the property will also 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.

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

DRI INFORMATION

DRI Number #3095
DRI Title Riverview Site
County Douglas County
City (if applicable)
Address / Location East of Whistler Drive, south of Fairburn Road (SR 70/154/166), and southwest of Britt Road near the Chattahoochee River

Proposed Development Type:
The proposed development will be an industrial warehouse facility with approximately 798,000 SF of warehousing space.
Build Out : 2023

Review Process ☒ EXPEDITED
☐ NON-EXPEDITED

REVIEW INFORMATION

Prepared by ARC Transportation Access and Mobility Division
Staff Lead Aries Little
Copied [Click here to enter text.](#)
Date November 13, 2020

TRAFFIC STUDY

Prepared by Kimley Horn
Date November 10, 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 the regional plan referenced and the page number of the traffic study where relevant projects are identified)*

The traffic analysis includes a list of programmed projects in Table 10 on page 23. The second project listed is ARC #D0-298/GDOT PI #0012877, which is the Douglas County portion of the Chattahoochee Greenway Trail from Boundary Waters Park to Sweetwater Creek State Park. The preferred alignment identified in the GDOT concept report from 2018 would go to the east of the site.

☐ NO *(provide comments below)*

REGIONAL NETWORKS

- 02. Will the development site be directly served by any roadways identified as Regional Thoroughfares?**

A Regional Thoroughfare is a major transportation corridor that serves multiple ways of traveling, including walking, bicycling, driving, and riding transit. It connects people and goods to important places in metropolitan Atlanta. A Regional Thoroughfare's operations should be managed through application of special traffic control strategies and suitable land development guidelines in order to maintain travel efficiency, reliability, and safety for all users. In light of the special function that Regional Thoroughfares serve in supporting cross-regional and interjurisdictional mobility and access, the network receives priority consideration for infrastructure investment in the Metro Atlanta region. Any access points between the development and a Regional Thoroughfare, combined with the development's on-site circulation patterns, must be designed with the goal of preserving the highest possible level of capacity and safety for all users of the roadway.

☐ NO

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

The proposed development will be accessible via one full access driveway on Fairburn Road (SR 70/154/166) which is functional classified as a principal arterial.

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*)

Fairburn Road (SR 70/154/166) is designated as 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

Nearest Station

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

Distance*

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

☐ 0.10 to 0.50 mile

☐ 0.50 to 1.00 mile

Walking Access*

☐ Sidewalks and crosswalks provide sufficient connectivity

☐ Sidewalk and crosswalk network is incomplete

☒ Not applicable (*accessing the site by walking is not consistent with the type of development proposed*)

[Click here to provide comments.](#)

Bicycling Access*

- ☐ Dedicated paths, lanes or cycle tracks provide sufficient connectivity
- ☐ Low volume and/or low speed streets provide connectivity
- ☐ Route follows high volume and/or high speed streets
- ☒ Not applicable (*accessing the site by bicycling is not consistent with the type of development proposed*)

Transit Connectivity

- ☐ Fixed route transit agency bus service available to rail station
- ☐ Private shuttle or circulator available to rail station
- ☐ No services available to rail station
- ☒ Not applicable (*accessing the site by transit is not consistent with the type of development proposed*)

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

05. If there is currently no rail transit service within one mile of the development site, is nearby rail service planned in the fiscally constrained RTP?

Access between major developments and transit services provide options for people who cannot or prefer not to drive, expand economic opportunities by better connecting people and jobs, and can help reduce traffic congestion. If a transit agency operates within the jurisdiction and expansion plans are being considered in the general vicinity of the development site, the agency should give consideration to how the site can be best served during the evaluation of alignments and station locations. Proactive negotiations with the development team and local government(s) are encouraged to determine whether right-of-way within the site should be identified and protected for potential future service. If direct service to the site is not feasible or cost effective, the transit agency and local government(s) are encouraged to ensure good walking and bicycling access accessibility is provided between the development and the future rail line. These improvements should be considered fundamental components of the overall transit expansion project, with improvements completed concurrent with or prior to the transit service being brought online.

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

[Click here to provide comments.](#)

06. If the development site is within one mile of fixed route bus services (including any privately operated shuttles or circulators open to the general public), provide information on walking and bicycling accessibility conditions.

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

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

☐ SERVICE WITHIN ONE MILE (provide additional information below)

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

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

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

☐ 0.10 to 0.50 mile

☐ 0.50 to 1.00 mile

Walking Access* ☐ Sidewalks and crosswalks provide sufficient connectivity

☐ Sidewalk and crosswalk network is incomplete

☒ Not applicable (accessing the site by walking is not consistent with the type of development proposed)

[Click here to provide comments.](#)

Bicycling Access* ☐ Dedicated paths, lanes or cycle tracks provide sufficient connectivity

☐ Low volume and/or low speed streets provide sufficient connectivity

☒ Route uses high volume and/or high speed streets

☐ Not applicable (accessing the site by bicycling is not consistent with the type of development proposed)

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

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

Connect Douglas fixed bus route #30 currently terminates at Tributary Village, about 2 miles by walking distance from the proposed site entrance on Fairburn Road.

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 **Note: The Douglas County portion of the Chattahoochee Greenways Trail is in the vicinity of the proposed development.**

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

☐ 0.15 to 0.50 mile

☐ 0.50 to 1.00 mile

Walking Access* ☐ Sidewalks and crosswalks provide connectivity

☐ Sidewalk and crosswalk network is incomplete

☐ Not applicable (accessing the site by walking is not consistent with the type of development proposed)

Bicycling Access* ☐ Dedicated lanes or cycle tracks provide connectivity

- ☐ Low volume and/or low speed streets provide connectivity
- ☐ Route uses high volume and/or high speed streets
- ☐ Not applicable (*accessing the site by bicycling is not consistent with the type of development proposed*)

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

OTHER TRANSPORTATION DESIGN CONSIDERATIONS

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

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

- ☐ YES (*connections to adjacent parcels are planned as part of the development*)
- ☐ YES (*stub outs will make future connections possible when adjacent parcels redevelop*)
- ☒ NO (*the site plan precludes future connections with adjacent parcels when they redevelop*)
- ☐ OTHER (*Please explain*)

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*)
- ☐ OTHER (*Please explain*)

[Click here to provide comments.](#)

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)

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)*

[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

