

DATE: Jan. 4, 2021

ARC REVIEW CODE: R2012171

TO: Chairman Phillip Beard
ATTN TO: Kim Wolfe, City Clerk/Planner
FROM: Douglas R. Hooker, Executive Director
RE: Development of Regional Impact (DRI) Review



Digital signature
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: Kilburn–Gravel Springs Road (DRI #3213)

Submitting Local Government: City of Buford

Review Type: Development of Regional Impact **Date Opened:** Dec. 17, 2020 **Date Closed:** Jan. 4, 2021

Description: A Development of Regional Impact (DRI) review of a proposed project to build two warehouse/distribution buildings totaling 958,896 SF in the City of Buford. The 90-acre site is located off Gravel Springs Road (SR 324) north of I-85. Proposed access would be a new driveway on Gravel Springs Road and one on Brown Road. The local trigger is a proposed annexation from unincorporated Gwinnett County into the City of Buford. This project is seeking expedited review from GRTA for limited trip generation. Expected buildout is 2022.

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.

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 I-85, I-985, Buford Drive (US23/SR20), Gravel Springs Road (SR 324), and the future Sugarloaf Parkway Extension, which will pass directly to the south of the DRI site, although direct access is unlikely. US23/SR20 is also defined by ARC as a Strategic Truck Route. Although this location is not currently considered an Industrial & Logistics Area in The Atlanta Region's Plan, the growing number of distribution/warehouse facilities in the area 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. Additional comments from ARC's Natural Resources Group are attached. They note that portions of the site plan conflicting with the headwaters of the easternmost stream on the property may require a variance under the City's stream buffer ordinance and the state's Sediment and Erosion Control ordinance.

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. During the Pre-Review meeting held on Dec. 7, 2020, ARC and GRTA staff advised that a sidewalk should be built on Brown Road from the project's eastern entrance to the next property line. Please see additional comments related to transportation from Gwinnett County Department of Planning and Development, which note the southwestern portion of the site is adjacent to Georgia Department of Transportation right-of-way for the Sugarloaf Parkway Extension, and may require additional right-of-way in coordination with Gwinnett County Department of Transportation. GDOT's aviation division notes that the project is near a navigation facility and will require a Form 7460-1 to be submitted to the Federal Aviation Administration. See the attached comments for additional details.

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.

This project is located in a character area defined as "Office/Professional" in the Buford 2040 comprehensive plan, and described as "properties that accommodate businesses that do not provide a product directly to customers on the premises, or do not as a primary activity involve manufacturing, storage, or distribution." The "Industrial/Commercial" character area lies farther to the east in what is now unincorporated Gwinnett County around the future I-85 interchange at Gravel Springs Road. The following guidance is offered for Industrial/Commercial areas:

These areas should also be aesthetically pleasing with high-quality design elements such as superior building materials, landscaping, and buffering from residential and other less intensive land uses. Steps should be taken to ensure that new industrial development within the city is green and does not have negative impacts on Buford's environmental quality.

In addition, comments from Gwinnett County indicate a potential conflict with the Gwinnett 2020 Unified Plan, which classifies this area in the "Vibrant Communities" character area, which is primarily residential and serves as a transition between neighborhood nodes and mixed-use activity centers. Given the future interchange at I-85 and Gravel Springs Road and ongoing redevelopment surrounding it, there appears to be a need for more coordination between the City and County to address long-term land use goals in the area.

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	GWINNETT COUNTY
CITY OF SUGAR HILL	CITY OF SUWANEE	HALL COUNTY
GEORGIA MOUNTAINS REGIONAL COMMISSION		

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



Developments of Regional Impact

[DRI Home](#)[Tier Map](#)[Apply](#)[View Submissions](#)[Logout](#)

DRI #3213

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:

Individual completing form:

Telephone:

E-mail:

*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:

Location (Street Address, GPS Coordinates, or Legal Land Lot Description):

Brief Description of Project:

Development Type:

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

If other development type, describe:

Project Size (# of units, floor area, etc.):

Developer:

Mailing Address:

Address 2:

City:

State:

Zip:

Telephone:

Email:

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

If yes, property owner:

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

information:	Project Name:	<input type="text"/>
	Project ID:	<input type="text"/>
	<input checked="" type="checkbox"/> Rezoning	
	<input type="checkbox"/> Variance	
	<input type="checkbox"/> Connect Sewer	
The initial action being requested of the local government for this project:	<input type="checkbox"/> Connect Water	
	<input type="checkbox"/> Permit	
	<input type="checkbox"/> Other	<input type="text"/>
Is this project a phase or part of a larger overall project?	<input type="radio"/> (not selected) <input type="radio"/> Yes <input checked="" type="radio"/> No	
If yes, what percent of the overall project does this project/phase represent?	<input type="text"/>	
Estimated Project Completion Dates:	This project/phase:	<input type="text" value="July 2022"/>
	Overall project:	<input type="text" value="July 2022"/>
<hr/>		
<div><div>Save Updates to Submitted Form</div><div>Save without Submitting</div><div>Cancel</div></div>		
Back to Top		

You are logged in to the DRI Website as **ggiuffrida** . | [Change Password](#) | [Go to Applications Listing](#)

[GRTA DRI Page](#) | [ARC DRI Page](#) | [RC Links](#) | [DCA DRI Page](#)

[DRI Site Map](#) | [Contact](#)



Developments of Regional Impact

[DRI Home](#)[Tier Map](#)[Apply](#)[View Submissions](#)[Login](#)

DRI #3213

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: City of Buford
Individual completing form: Kim Wolfe
Telephone: 770-945-6761
Email: kwolfe@cityofbuford.com

Project Information

Name of Proposed Project: Kilburn/Gravel Springs Road
DRI ID Number: 3213
Developer/Applicant: Kilburn Commercial Properties, LLC
Telephone: 404-625-1427
Email(s): skilburn@kilburncommercial.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: \$62 Million

Estimated annual local tax revenues (i.e., property tax, sales tax) likely to be generated by the proposed development: \$.85/sf/yr or \$816,000 annually estimated

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):

Water Supply

Name of water supply provider for this site: Gwinnett County Department of Public Utilities

What is the estimated water supply demand to be generated by the project, measured in Millions of Gallons Per Day (MGD)? .025 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: Gwinnett County Department of Public Utilities

What is the estimated sewage flow to be generated by the project, measured in Millions of Gallons Per Day (MGD)? .025 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? Estimated at +/- .5 miles

Land Transportation

How much traffic volume is expected to be generated by the proposed development, in peak hour vehicle trips per day? (If only an alternative measure of volume is available, please provide.) 143 in the PM Peak Hour (39 in, 104 out), 1560 daily 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: Improvements identified for are widening Brown Rd from the site driveway to SR 324, providing sidewalk along the site frontage and a dedicated left turn lane.

Solid Waste Disposal

How much solid waste is the project expected to generate annually (in tons)? 250 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 40%

Describe any measures proposed (such as buffers, detention or retention ponds, pervious parking areas) to mitigate the project's impacts on stormwater management. The project will be designed under the Georgia Blue book storm water manual and meet the requirement of TSS.

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:
Streams and Wetlands to be impacted with offsite mitigation.

[Back to Top](#)

[GRTA DRI Page](#) | [ARC DRI Page](#) | [RC Links](#) | [DCA DRI Page](#)

[DRI Site Map](#) | [Contact](#)

November 24, 2019

Andrew Spiliotis
State Road & Tollway Authority
245 Peachtree Center Avenue, Suite 2200, Atlanta, GA 30303
Telephone: 404-893-6171
Email: aspiliotis@srta.ga.gov

Re: Expedited Review Request for DRI #3213 Kilburn Commercial Development in Buford, GA

Dear Andrew,

An expedited DRI review is requested for the planned 958,896 square feet warehouse/distribution use in two (2) buildings will be located west of the Brown Rd and south of Gravel Springs Rd/SR 324 to be annexed into the City of Buford, Gwinnett County, Georgia. The new development will have two (2) driveways, one on SR 324 and one on Brown Rd. The project will be developed in a single phase by 2022.

According to GRTA's Procedures and Principles for DRI Review, the proposed DRI complies with the Expedited Review Criteria in Section 3-102, Part B – Limited Trip Generation, which states "...the land uses within the proposed DRI are such that the amount of trips generated by the development is likely to have minimal impact on the road network." Complying with:

2. More than one thousand (1,000) but no more than 3,000 gross daily trips generated by the DRI...

The proposed DRI is projected to generate 1,560 daily and 122 PM peak hour weekday trips...The data and methodology from the Institute of Transportation Engineers (ITE) Trip Generation, 9th Edition determined the trip generation shown in the following table:

Warehouse Distribution Center (150 LUC)		Project Trips		
		Total	Inbound	Outbound
Personal Vehicles	Daily	1,138	569	569
	AM Peak Hour	122	101	21
	PM Peak Hour	143	27	95
Trucks	Daily	422	211	211
	AM Peak Hour	18	7	11
	PM Peak Hour	21	12	9
Total Trips Generated	Daily	1,560	780	780
	AM Peak Hour	140	108	32
	PM Peak Hour	143	39	104

Developer Applicant Contact: G. Scott Kilburn, Kilburn Commercial Properties, LLC (404-665-1010)
Site Engineer: Daniel Wintermeyer, Urban Engineers (404.873.5874)
Traffic Engineering Contact: Randall Parker/John Karnowski, NV5 (770.316.1452/678.795.3607)

Sincerely,



Randall Parker PTP PTOE PE
cc: John Karnowski, Naveed Jaffar, NV5



December 29, 2020

Greg Giuffrida
Atlanta Regional Commission
229 Peachtree St. NE, Ste. 100
Atlanta, GA 30303

Re: Development of Regional Impact (DRI)- City of Buford Kilburn-Gravel Springs Road (DRI# 3213)

The Gwinnett County Department of Planning and Development has reviewed the Regional Review Notification (Review) prepared by the Atlanta Regional Commission (ARC) regarding the proposed development in the City of Buford, Gwinnett County, Georgia.

PROPOSED DEVELOPMENT

The proposed development consists of two warehouse/distribution buildings totaling 958,896 square feet. The approximate 90-acre site is located off Gravel Springs Road (SR 324) north of I-85. The proposed access will be a new driveway on Gravel Springs Road and a new driveway on Brown Road. There are 813 proposed parking spots. The local trigger is a proposed annexation from unincorporated Gwinnett County into the City of Buford. It is anticipated that this decision will be made at the next Buford City Council meeting on January 4, 2021. This project is seeking expedited review from the Georgia Regional Transportation Authority (GRTA) due to its estimated limited trip generation, which is allowable under GRTA guidelines. The expected buildout is 2022.

COMPATIBILITY WITH EXISTING PLANS

According to the Buford 2040 Comprehensive Plan, the Future Development Map (page 65) shows the site is within the Industrial/Commercial character area, one of the most common in Buford, and includes industrial uses such as warehousing, manufacturing and distribution facilities. The Future Land Use Map of Buford (page 83), shows this area as Office/Professional, which may be inconsistent with the proposed use.

The Future Development Map in the Gwinnett 2040 Unified Plan (page 291) identifies the site as in the Vibrant Communities character area. This character area is primarily residential and serves as a transition between neighborhood nodes and mixed-use activity centers. The site is also located within the Highway 124/324/Hamilton Mill Overlay District.

According to ARC's Unified Growth Policy Map (page 29) the area is identified as Developing Suburbs. These areas are characterized by residential development with pockets of commercial and industrial development.

NATURAL RESOURCES

The property is located within the Suwanee Creek Watershed, which in turn is within the Chattahoochee Corridor watershed. The Natural Resources Group Comments from ARC's Regional Review Notification for this DRI evaluated the regulations governing the watershed protection, stream buffers and stormwater/water quality elements of this project.

According to the site plan, there appear to be three streams in the northwest corner of the project area, plus one in the northeast corner. These are depicted with their buffers. There appears to be some encroachment of impervious

surface and building footprint area on these streams and buffers. Possible regulatory remedies for these encroachments are addressed in the Natural Resources Group Comments.

Gwinnett County is committed to the conservation, protection, and enhancement of the water quality in our streams and lakes.

INFRASTRUCTURE

Transportation

The traffic volume is anticipated to include 143 vehicle trips in the PM Peak Hour (39 in and 104 out) and a total of 1560 daily trips. Traffic impact on Gravel Springs Road, I-85 and I-985 is anticipated.

The southwestern property line of parcel R7143 010 adjoins the right of way for the future Sugarloaf Parkway Extension project currently under design by the Gwinnett County Department of Transportation (GCDOT). This project may require additional right of way from this parcel. Please coordinate with GCDOT to reserve this additional right of way in the rezoning and development process. No direct access would be permitted to Sugarloaf Parkway.

Water Supply and Wastewater

The estimated water supply is .025MGD and will be provided by Gwinnett County. The estimated sewage flow to be generated by the project is also .025MGD. Gwinnett County Department of Water Resources had no comment on this DRI.

Stormwater Management

There will be approximately 40% of impervious surface coverage of the site once the project is completed. According to the site plan there are three stormwater facilities proposed for this development.

Gwinnett County recommends that all work at a minimum be in accordance with the Gwinnett County Stormwater Management Manual.

SERVICES

Solid Waste

The project is anticipated to produce 250 tons of solid waste annually. In the DCA ([Georgia] Department of Community Affairs) Form II for DRIs, no sufficient capacity was indicated, or a provider listed.

Gwinnett County appreciates the opportunity to comment on this proposed development, and sincerely hopes that these comments will be given full consideration as the review process moves forward. Please feel free to contact me if you have any questions regarding Gwinnett County's position on this issue.

Best regards,



Cyndi Sloan, Division Director
Gwinnett County Department of Planning and Development

Greg Giuffrida

From: Hood, Alan C. <achood@dot.ga.gov>
Sent: Wednesday, December 30, 2020 10:54 AM
To: Greg Giuffrida
Subject: RE: ARC DRI Review Notification: Kilburn-Gravel Springs Road DRI #3213

Greg,

This proposed project is approximately 5.5 miles north of the Gwinnett County Airport – Briscoe Field (LZU). It is located outside any FAA approach or departure surfaces, and airport compatible land use areas, and does not appear to impact the 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

6th Floor

Atlanta, GA, 30308

404.660.3394 cell

404.532.0082 office

From: Greg Giuffrida <GGiuffrida@atlantaregional.org>

Sent: Thursday, December 17, 2020 4:46 PM

To: Andrew Spiliotis <aspiliotis@srta.ga.gov>; Annie Gillespie <agillespie@srta.ga.gov>; 'ccomer@dot.ga.gov'; 'chuck.mueller@dnr.state.ga.us'; 'cyvandyke@dot.ga.gov'; Delgadillo Canizares, Marlene V. <mcanizares@dot.ga.gov>; Finch, Ashley M <AFinch@dot.ga.gov>; Fowler, Matthew <mfowler@dot.ga.gov>; Kassa, Habte <hkassa@dot.ga.gov>; Hood, Alan C. <achood@dot.ga.gov>; Johnson, Lankston <lajohnson@dot.ga.gov>; Jon West <jon.west@dca.ga.gov>; 'kclark@gefa.ga.gov'; Matthews, Timothy W <TMatthews@dot.ga.gov>; McLoyd, Johnathan G <JoMcLoyd@dot.ga.gov>; Mertz, Kaycee <kmertz@dot.ga.gov>; 'nongame.review@dnr.ga.gov'; 'nrogers@dot.ga.gov'; pmartin@srta.ga.gov; pemmanuel@srta.ga.gov; Robinson, Charles A. <chrobinson@dot.ga.gov>; Woods, Chris N. <cwoods@dot.ga.gov>; Zane Grennell - Georgia DCA (zane.grennell@dca.ga.gov) <zane.grennell@dca.ga.gov>; Dykes, Jason <jdykes@dot.ga.gov>; Peevy, Jonathan <jpeevy@dot.ga.gov>; Giles, Shane <shgiles@dot.ga.gov>; Hunter, William E. <wihunter@dot.ga.gov>; Dan Wintermeyer <dwintermeyer@urbanengineers.net>; Kim Wolfe - City of Buford (KWolfe@cityofbuford.com) <KWolfe@cityofbuford.com>; Randy Parker - NV5 (Randy.Parker@nv5.com) <Randy.Parker@nv5.com>; Scott Kilburn <skilburn@kilburncommercial.com>; Kaipo Awana - City of Sugar Hill (KAwana@cityofsugarhill.com)

KILBURN COMMERCIAL GRAVEL SPRINGS ROAD DRI
City of Buford
Natural Resources Group Comments
December 15, 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 Suwanee Creek Watershed, which in turn is within Chattahoochee Corridor watershed. The project site is not within the Chattahoochee River Corridor and is not subject to Corridor Plan requirements. It is the water supply watershed portion of the Chattahoochee River watershed, which 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 more than seven miles upstream of any public water supply intake.

Stream Buffers

The USGS coverage for the project area does not show any blue line streams on or near the property. The project site plan shows three streams starting within the property and flowing towards the north and northwest. All three streams show 50-foot stream buffers and 75-foot impervious setbacks that appear to be consistent with the City of Buford's stream buffer ordinance, as well as the 25-foot State Sediment and Erosion Control buffer. The site plan shows a proposed driveway crossing the buffers at the headwaters of the easternmost stream and portions the entrance to truck bays, a parking lot and part of one building over a portion of one of the streams on the west side of the property. This construction may require a variance under the City's stream buffer ordinance and the State's Sediment and Erosion Control ordinance. Any unmapped streams on the property may be subject to the City's stream buffer ordinance, and all waters of the state on the property are 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 best 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 #3213
DRI Title Kilburn Commercial Development
County Gwinnett County
City (if applicable) City of Buford
Address / Location Western quadrant of the intersection of gravel Springs Rd/SR 324 and Browns Rd in Gwinnett County

Proposed Development Type:

A Development of Regional Impact (DRI) review of a proposed project to build two warehouse/distribution buildings totaling 958,896 SF in the City of Buford. The 90-acre site is located off Gravel Springs Road (SR 324) north of I-85. Proposed access would be a new driveway on Gravel Springs Road and one on Brown Road. The local trigger is a proposed annexation from unincorporated Gwinnett County into the City of Buford. This project is seeking expedited review from GRTA for limited trip generation.

Build Out : 2022

Review Process ☒ EXPEDITED
☐ NON-EXPEDITED

REVIEW INFORMATION

Prepared by ARC Transportation Access and Mobility Division
Staff Lead Aries Little
Copied Marquitrice Mangham
Date December 16, 2020

TRAFFIC STUDY

Prepared by Kilburn Commercial Properties

Date

December 15, 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*)

☒ NO (*provide comments below*)

There were no projects identified in the RTP within or near the proposed project site.

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 access points will be located at Brown Road and SR/324/Gravel Springs Road, which SR 324/Gravel Springs Road is identified 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*)

Per the ASTRoMaP, SR 324/Gravel Springs Rd and Brown Rd are not identified 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*)

[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

[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) Gwinnet County Transit

Bus Route(s) 411, 413 and 414

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

Gwinnett County Bus Transit commuter express route (Route 101/Zone 2) park and ride is the closest to the proposed project area.

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 [Click here to provide name of facility.](#)

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

☐ 0.15 to 0.50 mile

☐ 0.50 to 1.00 mile

Walking Access* ☐ Sidewalks and crosswalks provide connectivity

☐ Sidewalk and crosswalk network is incomplete

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

Bicycling Access* ☐ Dedicated lanes or cycle tracks provide connectivity

- ☐ Low volume and/or low speed streets provide connectivity
- ☐ Route uses high volume and/or high speed streets
- ☐ 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*)

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)*

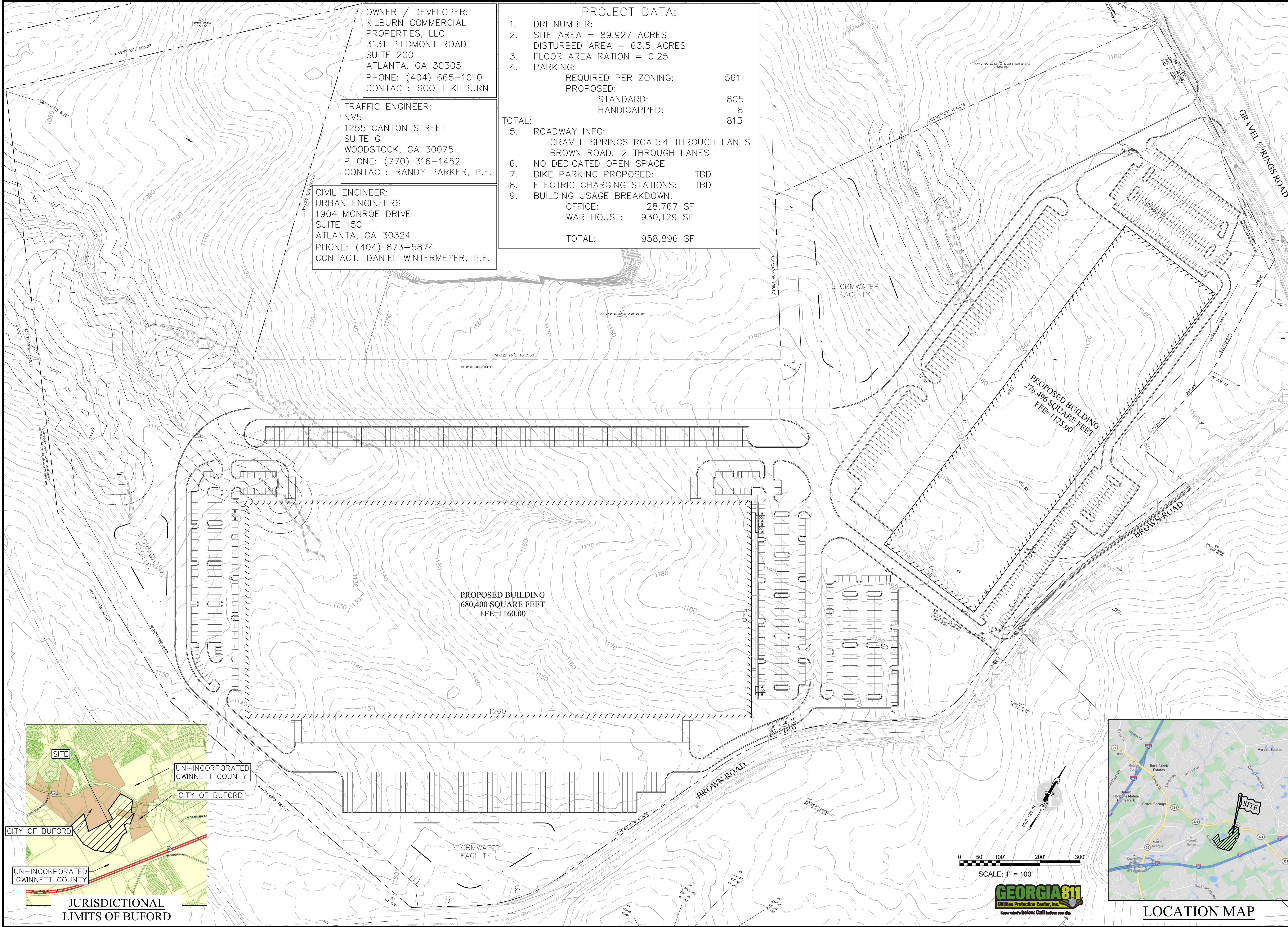
☐ YES *(see comments below)*

[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

U:\16-2020\16-202025 - Kilburn - Buford\16-202025 - DRI.dwg
11/20/2020 10:52 AM



OWNER / DEVELOPER:
KILBURN COMMERCIAL
PROPERTIES, LLC
3131 PIEDMONT ROAD
SUITE 200
ATLANTA, GA 30305
PHONE: (404) 665-1010
CONTACT: SCOTT KILBURN

TRAFFIC ENGINEER:
NV5
1255 CANTON STREET
SUITE G
WOODSTOCK, GA 30075
PHONE: (770) 316-1452
CONTACT: RANDY PARKER, P.E.

CIVIL ENGINEER:
URBAN ENGINEERS
1904 MONROE DRIVE
SUITE 150
ATLANTA, GA 30324
PHONE: (404) 873-5874
CONTACT: DANIEL WINTERMEYER, P.E.

PROJECT DATA:

1. DRI NUMBER:
2. SITE AREA = 89.927 ACRES
DISTURBED AREA = 63.5 ACRES
FLOOR AREA RATION = 0.25
3. PARKING:
REQUIRED PER ZONING: 561
PROPOSED:
STANDARD: 805
HANDICAPPED: 8
4. TOTAL: 813
5. ROADWAY INFO:
GRAVEL SPRINGS ROAD: 4 THROUGH LANES
BROWN ROAD: 2 THROUGH LANES
6. NO DEDICATED OPEN SPACE
7. BIKE PARKING PROPOSED: TBD
8. ELECTRIC CHARGING STATIONS: TBD
9. BUILDING USAGE BREAKDOWN:
OFFICE: 28,767 SF
WAREHOUSE: 930,129 SF
TOTAL: 958,896 SF

11/20/2020

Urban Engineers, Inc.

1904 MONROE DRIVE, N.E., SUITE 150
ATLANTA, GEORGIA 30324
PHONE: (404) 873-5874
www.urbanengineers.net



REVISIONS

DATE DESCRIPTION

DRI SITE PLAN

KILBURN COMMERCIAL
GRAVEL SPRINGS ROAD
BUFORD, GA

PROJECT No. 22002-5

LAND LOT(S): 173
DISTRICT: 5th
COUNTY: GWINNETT
SCALE: 1" = 100'
DATE: 11-20-2020

DRAWING NO.:

C-1

LOCATION MAP

