



ATLANTA REGIONAL COMMISSION 40 COURTLAND STREET, NE ATLANTA, GEORGIA 30303

February 24, 2003

Honorable Shirley Franklin, Mayor
City of Atlanta
55 Trinity Avenue, SW 2nd Floor West
Atlanta, Georgia 30335

RE: Development of Regional Impact Review
Moreland Avenue Retail Project

Dear Mayor Franklin:

I am writing to let you know that the ARC staff has completed the Development of Regional Impact (DRI) review of the Moreland Avenue Retail Project. This development proposal has been modified since our preliminary report was completed on January 15, 2003. Due to those revisions, which included adding 44% more residential units, the incorporation of flexible live-work space above 25% of the commercial structures, and a shuttle circulator on the site, the Atlanta Regional Commission finding is that this DRI is in the best interest of the State. Our review utilized the Regional Development Plan Policies and Best Development Practices as a guide to evaluate this development. The ARC staff has concluded that the modifications proposed for the development represent the minimum necessary to support our finding. Additional modifications to the development plan are desirable to ensure that this development will maximize the potential for open space, have a truly neighborhood scale compact design, and utilize the public transit facilities in the area.

Currently, the development reserves only 1.47 acres of the total development area in usable park areas. The project could have significantly more parkland by making the development design more compact. Integration of uses and relocation and redesign of the proposed single-story commercial buildings into multi-story mixed-use structures would help to promote a compact design and also allow for the public open space while preserving the development intensity of site. This will also help to create a neighborhood center and walking corridor along Caroline Street.

Similarly, impacts on the adjoining neighborhoods should be minimized. While not submitted as part of our review, the developer has been working on a traffic-calming plan for the area with the impacted community. We support their work and hope that all redevelopments will also include a traffic-calming plan as part of their development design. Failure to implement such a plan would cause unnecessary and detrimental impacts on the quality of life for the impacted communities. Additionally, all service trucks and their loading areas should be internalized in the development. Service areas located in close proximity to existing residential homes should be relocated.

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To comply with our Air Quality Benchmark standards, the applicant has agreed to work with the Metropolitan Atlanta Rapid Transit Authority (MARTA) to create a shuttle circulator for the development. We strongly encouraged this cooperation and hope that additional pedestrian improvements to the area can be made to promote the use of the MARTA stations that are in close proximity to this development.

I am enclosing a copy of our final review report with the letter submitted by the attorney Larry Dingle on behalf of the Sembler Corporation., the Georgia Regional Transportation Authority's expedited review decision, and comments from MARTA. Please feel free to call me, or Mike Alexander (404-463-3302), if you have any questions concerning the review.

Sincerely,



Charles Krautler
Director

CK/mda

Enclosures

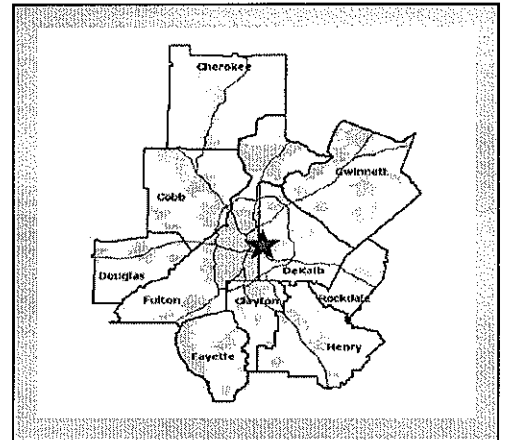
C: Ms. Nyna Gentry, City of Atlanta
Council Person Natalyn Archibong, City of Atlanta
Mr. Larry Dingle, Wilson, Brock & Irby L.L.C.
Mr. Gill Sallade, Sembler Corporation
Mr. Tom Coleman, GDOT
Mr. Rick Brooks, GDCA
Mr. Harold Reheis, GEPD
Mr. Jim Ritchey, GRTA
Mr. Nathaniel Ford, MARTA

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Go to Headings: [Description](#), [Regional Plan Consistency](#), [Population/Employment](#), [Location](#), [Economy](#), [Transportation](#), [Trip Generation](#), [VC Ratios](#), [Trans. Projects](#), [Transit](#), [Historic Resources](#), [Wastewater](#) [Water Supply](#), [Housing](#)

Georgia Department of Community Affairs DRI:	FORM 1	Submitted on: 11/01/02	FORM 2	Submitted on: 01/10/003
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PROPOSED DEVELOPMENT: Proposed redevelopment of the Atlanta Gas Light Maintenance and Office development totaling 41.9 acres that will include 800,000 square feet of retail space, 39 single-family townhomes, 40 loft condominiums / apartments, and 156 senior citizen multi-family units. The project is located inside the eastern portion of the City of Atlanta (DeKalb County) along the eastern right-of-way of Moreland Avenue. The proposed development is located along the right-of-ways of Moreland Avenue, Hardee Street, Marion Place, and La France Street and is bisected to the north and south by Caroline Street in Land Lot 209 of the 15th District.



PROJECT PHASING:

Information submitted with the review states that the residential uses will be completed after the retail development. The whole project, including the residential component is expected to be completed in five years and only one phase was used in the transportation analysis.

GENERAL

According to information on the review form or comments received from potentially affected governments:

Is the proposed project consistent with the host-local government's comprehensive plan? If not, identify inconsistencies.

The proposed development was inconsistent with the City of Atlanta Comprehensive Development Plan (CDP) at the time the Form 1 was submitted on the DCA website (11/01/02). The City has since redesignated the subject property from Industrial to Mixed Use so that the application will be consistent with City of Atlanta Comprehensive Development Plan. The applicant proposes to change the existing zoning from Industrial and Residential (I2, I1C, and RG-2) to Commercial (C3). The development could proceed, with minor modifications, without the rezoning, though the DRI review would still be required under Georgia Department of Community Affairs Rules.

Is the proposed project consistent with any potentially affected local government's comprehensive plan? If not, identify inconsistencies.

The site is located in the eastern section of the City of Atlanta. It is not contiguous to another local jurisdiction. Information submitted with the reviews states that the nearest local jurisdiction, unincorporated Dekalb County, is 1.5 miles from the property. No comments were received from any adjoining local government. No inconsistencies were identified during the review.

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Will the proposed project impact the implementation of any local government's short-term work program? If so, how?

No.

ARC regional review of the proposed development is conducted, where appropriate, using the following Regional Development Plan Policies and Best Practices:

REGIONAL DEVELOPMENT PLAN POLICIES

Policy 1 - Encourage new development to be more clustered in portions of the region where such opportunities exist.

Policy 2 - Strengthen and enhance the residential and mixed-use character of the Central Business District and City and Town Centers.

Policy 3 - Strengthen and enhance the residential and mixed-use character of existing and emerging Activity Centers.

Policy 4 - Encourage mixed use redevelopment of corridors where public services are currently available.

Policy 5 - Encourage Transit Oriented Development.

Policy 8 - Encourage mixed-use development.

Policy 9 - Encourage Traditional Neighborhood Developments.

Policy 10 - Protect environmentally sensitive areas.

Policy 13 - Encourage the utilization of Best Development Practices.

BEST LAND USE PRACTICES

Practice 1: Keep vehicle miles of travel (VMT) below the area average.

Practice 2: Contribute to the area's jobs-housing balance

Practice 3: Mix land uses at the finest grain the market will bear and include civic uses in the mix.

Practice 4: Develop in clusters and keep the clusters small.

Practice 5: Place higher-density housing near commercial centers, transit lines, and parks.

Practice 6: Phase convenience shopping and recreational opportunities to keep pace with housing.

Practice 7: Make subdivisions into neighborhoods with well-defined centers and edges.

Practice 8: Reserve school sites and donate them if necessary to attract new schools.

Practice 9: Concentrate commercial development in compact centers or districts, rather than letting it spread out in strips.

Practice 10: Make shopping centers and business parks into all-purpose activity centers.

Practice 11: Tame auto-oriented land uses, or at least separate them from pedestrian-oriented uses. Relegate "big box" stores to areas where they will do the least harm to the community fabric.

BEST TRANSPORTATION PRACTICES

Practice 1: Design the street network with multiple connections and relatively direct routes.

Practice 2: Space through-streets no more than a half-mile apart, or the equivalent route density in a curvilinear network.

Practice 3: Use traffic-calming measures liberally. Use short streets, sharp curves, center islands, traffic circles, textured pavements, speed bumps, and raised crosswalks.

Practice 4: Keep speeds on local streets down to 20 mph.

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Practice 5: Keep speeds on arterials and collectors down to 35 mph (at least inside communities).

Practice 6: Keep all streets as narrow as possible and never more than four traffic lanes wide. It is suggested that access streets be 18 feet, subcollectors 26 feet, and collectors from 28 feet to 36 feet depending on lanes and parking.

Practice 7: Align streets to give buildings energy-efficient orientations. Allow building sites to benefit from sun angles, natural shading, and prevailing breezes.

Practice 8: Avoid using traffic signals wherever possible and always space them for good traffic progression.

Practice 9: Provide networks for pedestrians and bicyclists as good as the network for motorists.

Practice 10: Provide pedestrians and bicyclists with shortcuts and alternatives to travel along high-volume streets.

Practice 11: Incorporate transit-oriented design features.

Practice 12: Establish TDM programs for local employees. Ridesharing, modified work hours, telecommuting and others.

BEST ENVIRONMENTAL PRACTICES

Practice 1: Use a systems approach to environmental planning. Shift from development orientation to basins or ecosystems planning.

Practice 2: Channel development into areas that are already disturbed.

Practice 3: Preserve patches of high-quality habitat, as large and circular as possible, feathered at the edges and connected by wildlife corridors. Stream corridors offer great potential.

Practice 4: Design around significant wetlands.

Practice 5: Establish upland buffers around all retained wetlands and natural water bodies.

Practice 6: Preserve significant uplands, too.

Practice 7: Restore and enhance ecological functions damaged by prior site activities.

Practice 8: Detain runoff with open, natural drainage systems. The more natural the system the more valuable it will be for wildlife and water quality.

Practice 9: Design man-made lakes and stormwater ponds for maximum environmental value. Recreation, stormwater management, wildlife habitat, and others.

Practice 10: Use reclaimed water and integrated pest management on large landscaped areas. Integrated pest management involves controlling pests by introducing their natural enemies and cultivating disease and insect resistant grasses.

Practice 11: Use and require the use of Xeriscape™ landscaping. Xeriscaping™ is water conserving landscape methods and materials.

BEST HOUSING PRACTICES

Practice 1: Offer "life cycle" housing. Providing integrated housing for every part of the "life cycle".

Practice 2: Achieve an average net residential density of six to seven units per acre without the appearance of crowding. Cluster housing to achieve open space.

Practice 3: Use cost-effective site development and construction practices. Small frontages and setbacks; rolled curbs or no curbs; shared driveways.

Practice 4: Design of energy-saving features. Natural shading and solar access.

Practice 5: Supply affordable single-family homes for moderate-income households.

Practice 6: Supply affordable multi-family and accessory housing for low-income households.

Practice 8: Mix housing to the extent the market will bear.

Is the proposed development consistent with regional plans and policies?

The proposed development meets many of the policies of the Regional Development Plan (RDP). The project represents an opportunity to convert a soon to be vacated industrial property into an infill commercial and residential multi-use development. The area has been lacking in commercial/retail services for many years, and this project will provide an opportunity for those uses to locate in this under-served area and along portions of the MARTA transit service area that currently lack shopping opportunities. Additionally, while the project may not include a desired level of residential development, the project does provide for some residential opportunities and the applicant has

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modified the original plan submitted to the ARC, based on the findings in the preliminary report, to include additional residential space- *Please See the Attached Letter date February 19, 2003*. This represents a 44% increase in the number of residential units from the original submittal to the ARC. Under existing zoning stipulations on the tract, the property could be developed with entirely commercial uses. Under the current zoning, only the preservation and conversion of the shoe factory to residential lofts would be allowed for residential development. However, the developer is attempting to rezone the property to allow for additional residential units. Also by changing the zoning classification, the developer is able to located the buildings closer to the sidewalk, and this will in part "frame" the streets and promote a walking environment.

While the development does meet many of the policies of the Regional Development Plan (RDP), many policies by which the project was evaluated could be used as guides to improve the project. In particular, the development lacks the ability to exploit a fixed regional transit resource. The proposed project is located approximately equidistant from the Inman-Park/Reynoldstown and Edgewood-Candler Park Marta stations. With such close proximity, within a quarter mile to either station, a transit-oriented development (TOD) would be the best use for the property and would represent an opportunity to capitalize on an existing transit corridor. As of January 15, 2003, the number of uses proposed for development was limited to commercial/retail and residential and they would have minimal interaction. No office uses were included in the proposal. The applicant has modified the original plan to allow for flexible live-work space that will add additional neighborhood oriented office and residential development into the core retail area. However, the need for additional and mixed uses, as well as the resultant design of the structures, while lessened by the improvements, could be further improved to make this development more transit oriented.

This development, with the modifications as described in the attached letter from the applicant, will improve the viability of other transportation choices to and in the development. Additional modifications to increase the diversity of uses would promote more internal capture of trips onsite. Based on regional benchmarks for transit use, the gross Floor Area Ratio for the development is .605. As stated in the applicant's letter proposing to modify the development, 25% of all commercial structures will include additional uses and 50% of total number of commercial structures will be multi-story. Excessive parking would promote the use of automobiles over public transportation. During the review process by the local government, parking needs should be further refined and include the provision for shared parking.

No civic uses, other than one Neighborhood Park, and four pocket parks, were proposed at the time of the preliminary report. Four additional pocket parks have been added to the site plan. Most of these pocket parks are located between residential structures and will adjoin delivery areas for the development. The total area of these parks is 1.47 acres. The current development design will harm the fabric of the residential development to the south and east. For example, the current design proposes to construct loading docks within 100 linear feet of existing residential homes.

The proposed development will have a long-term impact on the redevelopment potential of this area and as designed, and evidenced through the submitted traffic analysis, will have a significant long-term impact on the use of the public transportation system in this area. Further refinement, and the inclusion of additional uses, would help the proposal to set a positive precedent for retail development in close proximity to public transit facilities.

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Will the proposed project generate population and/or employment increases in the Region? If yes, what would be the major infrastructure and facilities improvements needed to support the increase?

The development, as preliminarily reviewed with 235 residential units would add an additional 450 people and 23 students to the area based on regional averages. The addition of 100 additional units will generate 115 people and 9 students. ARC estimates show that 1600 retail long-term jobs would be created. The number of short-term jobs will depend on the construction schedule. The applicant proposes mitigation measures include stormwater management, and erosion/sedimentation control measures.

What other major development projects are planned in the vicinity of the proposed project?

The following projects were reviewed by the ARC as either any Area Plan (1984 to 1991) or as a DRI (1991 to present) and are located within 1.5 miles of the subject site:

Year	Name
2000	Highland Ave. Development
2001	Glenwood Park
2002	Alta at Inman Park

The following tables provide comparison data between the recent major developments in the area and the proposed Moreland Avenue Retail Project. All are located in the City of Atlanta

Project	Total Acreage	Percent Residential *	Percent Commercial *	Percent Office*	Gross FAR	Total Square Footage	Total Trips/ No Reductions	Trips per 1000 sq foot /no reduction
Glenwood Park	26.77	84.95%	8.35%	6.70%	0.882	1,028,501	9,010	8.76
Highland Ave.	7.658	85.76%	1.50%	12.74%	2.000	669,081	3,345	4.99
Alta at Inman Park	20.985	92.18%	3.97%	3.84%	0.782	714,831	6,833	9.55
Moreland Ave Retail Project	41.9	22.69%	77.31%	None	0.581	1,034,800	41,560	40.1

* Based on Square Footage

Project	Number of Park Areas	Distance to Rail Transit	Total Res. Units	Net Res. Density	Additional Uses
Glenwood Park	4	4,900 linear ft.	490	18.30 u/a	School**
Highland Ave.	9	3,300 linear ft.	405	52.89 u/a	
Alta at Inman Park	3	2,200 linear ft.	586	27.92 u/a	
Moreland Ave Retail Project	5 (4 Pocket)	900 linear ft.	235	5.61 u/a	

** Elementary school containing 225,000 square feet of area.

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The surrounding projects, all of which are located further from transit facilities, are more intense than the Moreland Avenue Retail Development. The Moreland Avenue project generates, more total traffic, when use and square footage is controlled, than any of the other projects. The Moreland Avenue project will generate substantially more sales tax revenue than the other projects due to its large retail component. However, no information is known concerning how much of the new revenue generated will be based on sales that would have already occurred in the City before the development.

Will the proposed project displace housing units or community facilities? If yes, identify and give number of units, facilities, etc.

The project will displace 52 multiple-family residential units based on information submitted by the City of Atlanta.

Will the development cause a loss in jobs? If yes, how many.

No. The existing facility, and its employees will move to another location in the City of Atlanta.

LOCATION

Where is the proposed project located within the host-local government's boundaries?

The proposed development is located along the right-of-ways of Moreland Avenue, Hardee Street, Marion Place, La France Street and is bisected to the north and south by Caroline Street in Land Lot 209 of the 15th District.

Will the proposed project be located close to the host-local government's boundary with another local government? If yes, identify the other local government.

The proposed development is approximately 1.5 miles to the west of the western boundary of Dekalb County. The City of Decatur is approximately 2 miles away.

Will the proposed project be located close to land uses in other jurisdictions that would benefit or be negatively impacted by the project? Identify those land uses which would benefit and those which would be negatively affected and describe impacts.

The proposed development is located in a historic residential area along a State Highway. The project will impact the surrounding area. No additional impacts were determined during the review on surrounding jurisdictions.

ECONOMY OF THE REGION

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According to information on the review form or comments received from potentially affected governments:

What new taxes will be generated by the proposed project?

The build-out value of the project is estimated by the applicant at \$ 110,830,000.

Annual Tax Revenue	\$10,562,40	Property taxes	\$1,950,400	Sales Taxes	\$8,612,000
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How many short-term jobs will the development generate in the Region?

The number of short-term jobs generated by the project will depend on the construction schedule.

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

Yes.

In what ways could the proposed development have a positive or negative impact on existing industry or business in the Region?

The development will construct a retail space equivalent to a regional mall in an existing developed area. The proposed development will provide retail employment. Based on 2000 Georgia Department of Labor data, the average weekly wage for this type of employment in the Atlanta Area is \$391 per week.

NATURAL RESOURCES

Will the proposed project be located in or near wetlands, groundwater recharge area, water supply watershed, protected river corridor or other environmentally sensitive area of the Region? If yes, identify those areas.

In what ways could the proposed project create impacts that would damage or help to preserve the resource?

Watershed Protection

The property is in the Ocmulgee River Basin. The subject property drains into Sugar Creek, which is a tributary to the South River, but enters the River at a location that will not impair Atlanta Region water intakes. Therefore, the development is not located in an Atlanta Region water supply watershed. For any streams located on the property, the project should be designed to meet all applicable local buffer and stream protection ordinances as well as the state Erosion and Sedimentation 25-foot buffer. The site does not appear to have any groundwater recharge areas, floodplains, or wetlands.

Georgia Erosion and Sedimentation Act/Stream Buffer Requirements

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The Georgia Erosion and Sedimentation Control Act requires a 25-foot buffer on "State waters". The City and the developer should confer with the Georgia Environmental Protection Division (EPD) staff to determine whether any creek segments located on the property are considered "State waters".

Wetlands and Floodplains

Information submitted with the review does not show the presence of wetlands and floodplains on the site. ARC's Regional Development Plan policy is to protect such environmentally sensitive areas when new development or redevelopment occurs.

Watershed Protection

Storm Water/Water Quality

The estimated amounts of pollutants that will be produced after construction of the proposed development are presented below. These estimates are based on some simplifying assumptions for typical pollutant loading factors (lbs./ac/yr.) The loading factors are based on the results of regional storm water monitoring data from the Atlanta Region. The impervious areas are based on estimated averages for land uses in the Atlanta Region. These estimates are generalized for the metropolitan area and do not necessarily reflect the conditions of high-density development. However, the impervious area estimate used for commercial is 85 percent, which appears to be close to the approximate impervious coverage proposed for this project. Because the proposed site plans showed the residential areas with similar amounts of impervious surface to the rest of the project, they were not separated from the commercial areas. If impervious percentages are higher or lower, the pollutant loads will be differ accordingly from the estimates. The following table summarizes the results of the analysis:

Pollutant loads (lb./yr.)							
Land Use	Land Area (acres)	TP	TN	BOD	TSS	Zinc	Lead
Commercial	41.90	71.65	729.06	4525.20	41187.70	51.54	9.22
TOTAL	41.90	71.65	729.06	4525.20	41187.70	51.54	9.22

Total Impervious: 85% in this analysis

Structural Storm Water Controls

According to information submitted with the review, the development proposes storm water management. ARC staff recommends that before any permits are issued, the City should require that the developer submit a storm water management plan as a key component of the Plan of Development. The storm water plan should include location, construction and design details and all engineering calculations for all storm water quality control measures. The Plan also should include a monitoring program to ensure storm water pollution control facilities function properly. ARC staff recommends that structural controls be designed to accommodate the installation, operation and maintenance of automatic equipment at inlet and outlet locations for the monitoring of flow rates and water quality. It is recommended that the monitoring program consider the following minimum elements:

- Monitoring of four storms per year (1 per quarter);

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- Collection of flow weighted composite of the inflow to the structure during the entire storm event;
- Collection of a flow weighted composite of the outflow from the structure—the sampling period should include the peak outflow resulting from the storm event;
- Analysis of inflow and outflow flow weighted composite samples for biochemical oxygen demand (BOD), total suspended solids (TSS), zinc, lead, total phosphorous (TP) and total nitrogen (TKN & NO3); and
- Collection of grab samples at the inlet and outlet locations during the periods of peak inflow and outflow for pH, dissolved oxygen (DO) and fecal coliform bacteria.

The City should determine the actual number and size of storms to be monitored as well as who should be responsible for conducting the monitoring. Monitoring should be conducted at the development's expense. Analysis should conform to EPA standards. Specific monitoring procedures and parameters analyzed may change in the future based on continuing storm water runoff and water quality studies.

The storm water plan should require the development to submit a detailed, long-term schedule for inspection and maintenance of the storm facilities. This schedule should describe all maintenance and inspection requirements and persons responsible for performing maintenance and inspection activities. These provisions and the monitoring program should be included in a formal, legally binding maintenance agreement between the City and the developer.

In addition to inspections required in the storm water management plan, the formal maintenance agreement between the developer and the City should allow for periodic inspections for the storm water facilities to be conducted by the City. If inadequate maintenance is observed, the development should be notified and given a period of time to correct any deficiencies. If the development fails to respond, the City should be given the right to make necessary repairs and bill the development.

The City should not release the site plans for development or issue any grading or construction permits until a storm water management plan has been approved and a fully executed maintenance/monitoring agreement is in place.

HISTORIC RESOURCES

Will the proposed project be located near a national register site? If yes, identify site.

No impacts to historic resources were determined during the review.

In what ways could the proposed project create impacts that would damage the resource?

N/A

In what ways could the proposed project have a positive influence on efforts to preserve or promote the historic resource?

The proposal includes the reuse of the existing office building on the property that was originally constructed as a shoe factory.

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INFRASTRUCTURE

Transportation

Georgia Regional Transportation Authority Review Findings

Sembler Corporation seeks GRTA/ARC approval under the expedited review standards. GRTA's expedited approval is based on the following criteria:

"Land Uses in the proposed DRI are such that when considered in the context of existing approved use in the proposed DRI's area of influence it is likely that at least 65% of the single occupant vehicle trips generated by the proposed DRI are reasonably anticipated to have a trip length of less than six miles or less."

The development will consist of various uses, explicitly identified in the trip generation table below. It is characterized as a mixed-use development, although there is no integration of uses at the building scale. The development will include "big-box" retail development including a national chain home improvement retail center. A very small portion of the 41.9-acre site will be devoted to residential use. Parking is shown as less than what is required by City of Atlanta Code. The property will have limited two-story decked parking using the grade slope to provide the second story.

The expedited approval by GRTA is based on a distance of 6 miles driving distance that was designed for use in Florida in areas primarily of a rural or low-intensity suburban character. This approval was not based in any material way on the uses proposed or quality of the design as it relates to the infrastructure adjacent to the facility. As a result, the conditions placed on the approval by GRTA are limited to those shown on the site plan as submitted by the applicant. The study done, and the subsequent approval, did not balance the quality and impact of the project and the land use and infrastructure conditions surrounding it. The intensity of this area and the proximity to the Central Business District and Buckhead insures that any development, irrespective of the uses proposed or the quality of the design, will meet the expedited criteria approved for this project.

How much traffic (both average daily and peak am/pm) will be generated by the proposed project?

URS Corporation performed the transportation analysis. GRTA and ARC review staff agreed with the methodology and assumptions used in the analysis. The net trip generation was included by the transportation consultant, and is listed in the table below.

Trip Generation

ITE Code	Land Usage	Sq. Ft./Unit	A.M. Peak Hour Trips		P.M. Peak Hour Trips		Saturday Peak		24 hour 2-way
			Enter/Exit	Total	Enter/Exit	Total	Enter/Exit	Total	
820	General Retail	316,593	181/115	296	297/332	631	353/373	609	7,572
832	High-Turnover Restaurant	18,000	0/0	0	48/29	77	83/48	131	1,372
862	Home Improvement	133,841	96/88	184	104/69	173	222/197	419	4,253

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	Store								
861	Wholesale Club	138,700	43/41	84	89/69	158	128/137	265	3,809
813	Department Store	138,700	121/116	237	112/114	226	84/88	172	2,169
850	Grocery Store	54,166	119/76	195	114/110	224	102/93	195	4,028
220/230	Residential	300	18/100	118	64/11	75	37/35	72	928
Unadjusted Total			625/595	1,220	1,934/1,818	3,754	2,780/2,545	5,325	41,560
Total Reductions			47/59	106	1106/1084	1,084	1,771/1691	3,462	17,399
Net Vehicle Trips			578/536	1,114	828/734	734	1,564/854	1,836	24,131

What are the existing traffic patterns and volumes on the local, county, state and interstate roads that serve the site?

Incorporating the trip generation results, the transportation consultant distributed the traffic on the current roadway network. The results of this exercise determined the study network, which was approved by ARC and GRTA. The actual roadway segments and intersections being analyzed by the consultant are listed in the study. An assessment of the existing LOS and projected LOS based on the trip distribution findings helps to determine the study network. If the analysis of the road segment or intersection resulted in a substandard LOS ("D" for City of Atlanta), then the consultant recommended improvements.

V/C Ratios A.M. Peak-Hour

Facility	2005			2010			2025		
	Lns	Volume	V/C	Lns	Volume ¹	V/C	Lns	Volume ¹	V/C
Moreland Avenue	6	8170	.4541	6	9640	.5356	6	9210	.5115
DeKalb Avenue	2	2370	.4943	2	2630	.5483	2	2670	.5558
Memorial	4	5300	.4139	4	5060	.3947	4	4560	.3796

The data is based on 2005, 2010 and 2025 PM peak volume data generated from ARC's travel demand model for the 2025 RTP, Limited Update, adopted in October 2002. USDOT conformity is pending. The demand model incorporates lane addition improvements and updates to the network as appropriate.

V/C Ratios P.M. Peak-Hour

Facility	2005			2010			2025		
	Lns	Volume	V/C	Lns	Volume ¹	V/C	Lns	Volume ¹	V/C
Moreland Avenue	6	11980	.6658	6	12490	.6941	6	12730	.7072
DeKalb Avenue	2	3150	.6554	2	3650	.7603	2	5000	1.043
Memorial	4	8520	.6658	4	7960	.6212	4	7870	.6559

The data is based on 2005, 2010 and 2025 PM peak volume data generated from ARC's travel demand model for the 2025 RTP, Limited Update, adopted in October 2002. USDOT conformity is pending. The demand model incorporates lane addition improvements and updates to the network as appropriate.

What transportation improvements are under construction or planned for the Region that would affect or be affected by the proposed project? What is the status of those improvements (long or short range or other)?

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2003-2005 TIP*

ARC Number	Route	Type of Improvement ²	Scheduled Year ³	Direct Influence to Project?
AT 163	Memorial Drive at Moreland Ave.	INT. IMP.	2006	Yes

*Note that the ARC Board adopted the FY 2003-2005 TIP in October 2002, GRTA and USDOT approval expected by January 2003.

2025 RTP. Limited Update*

ARC Number	Route	Type of Improvement ²	Scheduled Year ³	Direct Influence to Project?
AR 269A	Commuter rail from Athens-Dacula-Atlanta	REGTRAN-RAIL	2016	No
AR 269A2A	Commuter rail from Athens-Dacula-Atlanta	REGTRAN-RAIL	2016	No
AR 269 A2B	Commuter rail from Athens-Dacula-Atlanta	REGTRAN-RAIL	2016	No
AR 269B	Commuter rail from Athens-Dacula-Atlanta	REGTRAN-RAIL	2016	No
AT 115	Memorial Drive from Whiteford Ave. to Pearl St.	UPGRADE	2015	No
AT 169	Pedestrian Bridge over I-20, east of Moreland Ave.	PEDESTRIAN	2015	No

*Note that the ARC Board adopted the 2025 RTP, Limited Update in October 2002. GRTA and USDOT approval expected by January 2003.

What are the recommended transportation improvements based on the traffic study done by the applicant? What are the conclusions of the traffic study?

The future no-build condition of the network will require improvements to be made at the Moreland Ave./Memorial Dr. intersection. For instance, in the future background condition, the transportation consultant projects the intersection of Memorial Dr. and Moreland Ave. will operate at level of service F. Future build-out conditions will require improvements to be made at:

- ✓ The Moreland Ave./Site Driveway No. 1 intersection
- ✓ The Moreland Ave./Site Driveway No. 2 intersection
- ✓ The Moreland Ave./Caroline St. intersection
- ✓ The Moreland Ave./Hardee St. intersection
- ✓ The Moreland Ave./Memorial Dr. intersection
- ✓ The DeKalb Ave./Whiteford Ave. intersection

The specific improvements that were recommended can be found in the study. One of the major improvements includes converting the Memorial Drive lane configuration from reversible to two shared through-lanes in both directions and one exclusive left-turn lane in the westbound direction. Signalizing the intersection of Moreland and Site Driveway No. 2 was another.

Will the proposed project be located in a rapid transit station area? If yes, how will the proposed project enhance or be enhanced by the rapid transit system?

Yes. As indicated in the traffic impact study, MARTA serves this location quite extensively. Despite the abundance of transit service located nearby, the character of the development and the site plan does not promote use of transit to the site. The site plan focuses on providing more than the

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minimum number of parking spots. This indicates that the development will encourage the use of the automobile as the primary mode on and off the site. Operating a shuttle or circulator between the rail stations and the development could leverage more transit ridership.

Is the site served by transit? If so, describe type and level of service.

The proposed project is located near a greater amount of transit infrastructure than any DRI reviewed within a 2-mile radius. It is within approximately a ¼ of a mile of two rail stations on the East-West Line: Inman Park/Reynoldstown and Edgewood-Candler Park. In addition to the transit stops, Marta bus routes 28, 48, 107, and 17 all have stops along Moreland Ave., adjacent to the proposed development. Each of these routes feed either of the two rail stations.

Are there plans to provide or expand transit service in the vicinity of the proposed project?

None at this time.

What transportation demand management strategies does the developer propose (carpool, flex-time, transit subsidy, etc.)?

The development proposal has been modified by the applicant to comply with ARC's Air Quality Benchmark test by adding a local area shuttle circulator to the development

This is due to the limited number of uses proposed for development.

Air Quality Impacts/Mitigation (based on ARC strategies)	Type Yes below if taking the credit or blank if not	Credits	Total
Density Target levels			
Where Retail/Office is dominant, FAR .6-.8	No	4%	0%
Where Retail/Office is dominant, FAR >.8	No	6%	0%
Where Residential is dominant, 10-12 units/ac	No	4%	0%
Where Residential is dominant, >15 units/ac	No	6%	0%
Mixed Use Targets (w/sidewalks)			
Where Office is dominant, 10% Residential or 10% Retail	No	4%	0%
Where Office is dominant, 10% Residential and 10% Retail	No	9%	0%
Where Retail is dominant, 10% Residential or 10% Office	Yes	4%	4%
Where Retail is dominant, 10% Residential and 10% Office	No	9%	0%

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Where Residential is dominant, 10% Retail or 10% Office	No	4%	0%
Where Residential is dominant, 10% Retail and 10% Office	No	9%	0%
Proximity to Public Transportation (choose one)			
w/in 1/4 mile of Bus Stop (CCT, MARTA, Other)	No	3%	0%
w/in 1/2 mile of MARTA Rail Station	Yes	5%	5%
Transportation Service Enhancements (choose one)			
Shuttle service to employment ctr/transit facility	Yes	3%	3%
TMA or Parking Management Program	No	3%	0%
PMP= reserved spaces for carpool vehicles, and monthly discount voucher raffles	No		
TMA that includes shuttle service	No	5%	0%
TMA and Parking Management/supply restrictions Program	No	5%	0%
Bicycle or Pedestrian facilities within the site (choose one)			
Bike/ped networks connecting uses w/in the site	No	2%	0%
Bike/ped networks connecting to land uses adjoining the site	No	2%	0%
Bike/ped networks connecting to land uses within and adjoining the site	No	4%	0%
Bike/ped networks that meet Mixed Use or Density target	No	4%	0%
Bike/ped networks that meet Mixed Use or Density target and connect to adjoining uses	Yes	5%	5%
Total Calculated ARC Air Quality Credits (15 % reduction required)	Meets Benchmark Standards		17%

What is the cumulative trip generation of this and other DRI's or major developments? Is the transportation system (existing and planned) capable of accommodating these trips?

A more thorough approach for trip distribution should be considered given the size and impact of this DRI. In scale, the proposed development is a regional activity center. Incorporating potential

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origin/destination trip characteristics (i.e. zip code or market feasibility) may better describe the impacts of this retail development. Moreland Avenue is not scheduled for any major improvements, short or long-term adjacent to this project. The traffic impacts could create bottlenecks at some points inside or adjacent to the existing study network used by the consultant.

This development could be modified to help promote development patterns that reduce, not enhance, the current level of congestion on the road network in the area. At the minimum, additional uses including office should be added to the development to better utilize the transit infrastructure in the area.

Sources:

1. ARC's RTP travel demand model analysis (adopted October 23, 2002)
2. *Transportation Solutions for a New Century*, Volumes I, II, & III

Footnotes:

1. Lane and traffic counts may include HOV lanes, unless otherwise shown in the matrix.
2. For a detailed description of types of improvement refer to ARC Regional Transportation Plan (RTP) or most current Transportation Improvement Program (TIP).
3. Scheduled year refers to the RTP model year or TIP programmed year unless otherwise noted.

INFRASTRUCTURE: Wastewater and Sewage

How much wastewater and sewage will be generated by the proposed project?

Wastewater is estimated at 0.1966 MGD based on regional averages. Information submitted with the review stated that the amount of wastewater produced would be .11 MGD. This is inconsistent with regional averages for this type of development.

Which facility will treat wastewater from the project?

It appears that wastewater would be received initially by the Entrenchment Creek where secondary treatment would occur. It would then be pumped to the South River Plant for final treatment and release.

What is the current permitted capacity and average annual flow to this facility?

The capacity of the South River plant is listed below:

PERMITTED CAPACITY MMF, MGD ₁	DESIGN CAPACITY MMF, MGD	2001MMF, MGD	2008 MMF, MGD	2008 CAPACITY AVAILABLE +/-, MGD	PLANNED EXPANSION	REMARKS
48	54	37	45	3	None	

MMF: Maximum Monthly Flow. Mgd: million of gallons per day.

₁ Source: Metropolitan North Georgia Water Planning District *SHORT-TERM WASTEWATER CAPACITY PLAN* Final Report

What other major developments the plant serving this project will serve?

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ARC has reviewed a number of major developments, as described before in this review report that would add wastewater flow to this plant.

INFRASTRUCTURE

Water Supply and Treatment

How much water will the proposed project demand?

Water demand is estimated at 0.2313 MGD based on regional averages.

How will the proposed project's demand for water impact the water supply or treatment facilities of the jurisdiction providing the service?

Water supply should be sufficient, but water-conserving measures are essential in all new developments.

INFRASTRUCTURE

Solid Waste

How much solid waste will be generated by the project? Where will this waste be disposed?

Based on regional averages, the development will generate 3957 tons of solid waste per year.

Other than adding to a serious regional solid waste disposal problem, will the project create any unusual waste handling or disposal problems?

No.

Are there any provisions for recycling this project's solid waste.

None stated. However, the concentration of uses in the development would appear to provide a good opportunity for recycling and should be encouraged by the City and County. It is likely that much of the waste, cardboard associated with the packaging of durable goods, can be recycled.

INFRASTRUCTURE: Other facilities

According to information gained in the review process, will there be any unusual intergovernmental impacts on:

- Levels of governmental services?
- Administrative facilities?
- Schools?
- Libraries or cultural facilities?
- Fire, police, or EMS?
- Other government facilities?

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- **Other community services/resources (day care, health care, low income, non-English speaking, elderly, etc.)?**

This will be determined during the review.

HOUSING

Will the proposed project create a demand for additional housing?

The development will create some additional demand for housing due to the employment associated with the retail uses.

Will the proposed project provide housing opportunities close to existing employment centers?

No. However, it will provide housing in a location that is very accessible to public transit.

Is there housing accessible to the project in all price ranges demanded?

The site is located in an older, but redeveloping area of the City where a wide variety of housing types and prices are available. The project site is located in Census Tract 205.00. According to the 2000 Census, this tract lost 43 units from 1990 to 2000. By the ARC's 2000 Population and Housing report, Tract 205.00 had an 85.1 percent occupancy rate compared to a regional rate of 90.5 percent.

Is it likely or unlikely that potential employees of the proposed project will be able to find affordable* housing?

Likely, since MARTA service is available.

* Defined as 30 percent of the income of a family making 80 percent of the median income of the Region – FY 2002 median income of \$57,795 for family of 4 in Georgia.

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February 18, 2003

Mr. Mike Alexander
Review Coordinator
Atlanta Regional Commission
40 Courtland Street, NE
Atlanta, GA 30303

**Re: Development of Regional Impact (DRI)
Moreland Avenue Retail Development**

Dear Mr. Alexander:

Since our letter dated February 5, 2003, we have had the opportunity to review MARTA's bus service plan for the Moreland Avenue Retail Development and physically walk the pedestrian connections to the Inman Park/Reynoldstown and Edgewood/Candler Park transit stations.

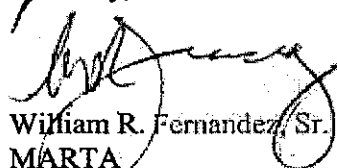
As you know, the Moreland Avenue development site is approximately ¼ mile from both the Inman Park/Reynoldstown and Edgewood/Candler Park transit stations. Also, six MARTA bus routes (Nos. 7, 18, 28, 34, 48, and 107) have existing stops adjacent to the site on Moreland Avenue, Marion Place and Caroline Streets on their way to and from the stations.

The frequency of buses serving the development site averages every 10 to 15 minutes, which upon review appear to adequately serve the property, linking it with the two transit stations. We are concerned however, that service may be impaired along Moreland Avenue if there is a dedicated turn lane and Caroline Street if adequate facilities such as a bus stops or pulloffs are not provided for. From conversations with members of the development team, however, we are optimistic that accommodations can be made.

With regard to the pedestrian connection from the development site to the transit stations, we have found it to be adequate with the exception of the north side of La France Street from Marion Place to Whiteford Street. We feel that this connection to the Edgewood/Candler Park transit station could be improved to the benefit of all stakeholders.

Thank you again for the opportunity to review the proposal. We look forward to working closely with you and the development team on the above mentioned issues to assure that this is a transit friendly development. Please let me know if you have any questions.

Sincerely,



William R. Fernandez, Sr.
MARTA
Director, Transit System Planning & Development

DRI Letter – Moreland Avenue Retail Development

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cc. **Mr. Nathaniel P. Ford, Sr., General Manager/CEO, MARTA**
 Ms. Gail Charles, Deputy General Manager of Administration, MARTA
 Mr. Darryl P. Connelly, Manager of Property Development, MARTA
 Ms. Thelma Purnell, Manager of Planning, MARTA
 Mr. Richard Wallace, Sr. Transportation Planner, MARTA
 Ms. Carolyn Morgan, Sr. Transportation Planner, MARTA
 Councilmember Natalyn Archibong, Atlanta City Council
 Mr. Larry Dingle, Attorney, Wilson Brock & Irby, L.L.C.

WILSON BROCK & IRBY, L.L.C

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February 20, 2003

Michael Alexander
Atlanta Regional Commission
40 Courtland St. NE,
Atlanta, GA 30303

RE: The Sembler Company ("Sembler") - Moreland Avenue Development

Dear Mike:

Thank you for calling our meeting yesterday and inviting a representative of the Edgewood Neighborhood organization, MARTA, the City of Atlanta Traffic Division, and GRTA to participate. The meeting was very helpful in that it allowed Sembler to identify additional project enhancements that it can propose in response to some of the concerns raised by the Atlanta Regional Commission ("ARC") in its final report. Sembler requests that this letter be made an attachment to and a part of the ARC final report.

First, Sembler proposes, if MARTA deems it necessary, to develop a bus shuttle service or shuttle circulator with MARTA in a manner that does not compete with, but rather compliments, the existing bus service in the site area. MARTA wishes to assure that a shuttle circulator by Sembler will not in any way reduce existing MARTA ridership. Sembler also proposes to construct three bus shelters on its property. By working with MARTA on these and other public transportation initiatives, we believe that the project meets the Air Quality Benchmarks adopted by the ARC as well as reduce the number of vehicle trips to and from the site.

Second, ARC also express concerns about the mixed use character as it is currently proposed. Specifically, requests have been made to provide and orient residential uses towards Caroline Street. As you know, Sembler has agreed, at the request of the neighborhood, to preserve the existing shoe factory building and convert it to residential lofts. The shoe factory building fronts along and is oriented to Caroline Street and is integrated as a residential component of the retail development.

The ARC staff has indicated that the residential densities of the project should be increased beyond the existing residential components along Marion Place, Hardee Street and Caroline Street to further enhance the mixed use character of the development. Additionally, the

WILSON BROCK & IRBY, L.L.C.

Michael Alexander

February 19, 2003

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ARC staff requested that we look for the opportunity to increase our commitment to office uses.

In response to these requests, Sembler proposes to convert the housing segment along Marion Street, north of Caroline Street, from 29 residential units (as shown on the site plan dated January 24, 2002) to 100 residential units. Additionally, as discussed during the meeting, the site plans shows approximately 25,000 square feet of space at the second level above retail on the south side of Caroline Street. Sembler proposes that this space be programmed or developed as flexible live-work, neighborhood oriented-office or residential space. This space could add approximately 30 to 35 additional units of live/work unit and result in 25% of the total number of proposed commercial buildings containing second story residential, office or live work uses, with the possibility (as shown on the site plan) that such second story uses be included on 8 of the total proposed 16 commercial buildings. We believe that these additional project enhancements will significantly improve the mixed-use character of the proposed use as desired by the ARC, which in turn will increase the interaction of this development with the supportive transit infrastructure and reduce vehicle miles traveled. Additionally, such office/residential additions allows the project to consist of a true live/work/play environment on this site.

We also wish to stress the compactness of this development. As is the case with any retail development, the parking lot requirements are greater than less intense uses. To mitigate this reality, Sembler proposes to provide a below-grade parking deck which will contain as much as 25% of the total parking required. This proposal serves to develop compactness of the development.

If you have any further questions regarding this proposal, please do not hesitate to contact our office.

Sincerely,

WILSON BROCK & IRBY, L.L.C.



Larry M. Dingle

Steve Rothman

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