


DATE: MARCH 5, 2022

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


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The Atlanta Regional Commission (ARC) has completed a regional review of the following DRI. ARC reviewed the DRI's 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: Strategic West Logistics Center IV – Douglas Hills DRI 3515

Submitting Local Government: Douglas County

Date Opened: February 3, 2022

Date Closed: March 5, 2022

Description: A DRI Review of a proposal to construct a warehouse/distribution facility on a 134.5 acre site bordering Sweetwater Creek and Sweetwater Creek State Park off of Douglas Hills Road in Douglas County. The site is currently forested and includes a tributary of Sweetwater Creek. The project proposes 964,440 SF of industrial warehouse space across four buildings, with associated parking and access roads. Access is proposed via two full-movement driveways on Douglas Hills Road. The local DRI review trigger is a Douglas County rezoning application. The expected buildout year is 2024.

Final Comments

Key Comments

- The project site immediately borders the environmentally sensitive resources of Sweetwater Creek and Sweetwater Creek State Park.
- The project proposes multiple intrusions into protected stream buffers which may require variances for approval; some applicable stream buffers are not shown on the plans.
- Georgia Department of Natural Resources Wildlife Resources Division noted that: federally listed species have been documented within three miles or within the watershed(s) of the site; state protected species have been documented near the project; and due to the site's natural condition and adjacency to Sweetwater Creek State Park, preservation of the site or portions of it would be desirable.
- The project is not aligned with regional policies applicable to the Developing Rural Areas growth management designation of a large portion of the site which state "These areas are characterized by

limited single-family subdivisions, large single-family lots, agricultural uses, protected lands, and forests. The region should strive to protect these areas by limiting infrastructure investments to targeted areas and allowing no development or only low-intensity development.”

- The project is expected to have a minimal transportation impact.

General Comments

According to the ARC Unified Growth Policy Map (UGPM), part of The Atlanta Region's Plan, this DRI site designation is split between Established Suburbs and Developing Rural Areas. The Plan's Regional Development Guide (RDG) provides general information and policy recommendations for these growth management categories as detailed at the end of these comments.

The DRI proposes to construct a warehouse/distribution facility on a 134.5 acre site that borders Sweetwater Creek and Sweetwater Creek State Park off of Douglas Hills Road in unincorporated Douglas County. The site is currently forested and includes a tributary of Sweetwater Creek. The development plan proposes a total of 964,440 SF of industrial warehouse space across four buildings, with associated parking and access roads. Site access is proposed via two full-movement driveways on Douglas Hills Road.

Transportation and Mobility Comments

ARC's Transportation Access and Mobility Group full comments are attached.

The project will be served by a Regional Thoroughfare and a Regional Truck Route. Due to the warehouse nature of the project, there are limited opportunities for utilizing or enhancing multi-modal transportation options.

Care should be taken to ensure that the development, as constructed, promotes an interconnected, functional, clearly marked and comfortable pedestrian experience on all driveways, paths, entrances, and parking areas. To the maximum extent possible, new driveways and intersection corners where pedestrians will cross should be constructed with minimal curb radii to reduce speeds of turning vehicles and decrease crossing distances for pedestrians.

ARC Natural Resource Group Comments

ARC's Natural Resources Group full comments are attached.

“The USGS coverage for the project area and the submitted site plan both show Sweetwater Creek running along most of the northern boundary of the property. In addition, both the USGS coverage and the site plan show unnamed blue-line tributary to Sweetwater running along the northeastern portion of the property, starting entirely within the property boundaries and then running along the property boundary until it cuts across the northernmost portion of the property to flow into Sweetwater Creek.”

“The site plan shows and identifies the 100-foot undisturbed buffer and additional 50-foot impervious surface setback required by the County along Sweetwater Creek. However, the State 25-foot State Erosion and Sedimentation Control buffer is not shown along Sweetwater Creek. Along the tributary, it appears that the 50-foot undisturbed buffer and additional 25-foot impervious setback required by the Douglas County Stream Buffer Ordinance and the State 25-foot State Erosion and Sedimentation Control buffer are shown but not identified between the tributary headwaters and the point where an unnamed two lane road crosses the stream. Between that point and Sweetwater Creek, the 50-foot undisturbed buffer and the State 25-foot buffer are shown and identified, but the additional 25-foot impervious surface setback is not shown. All applicable buffers should be shown on the plan.”

“The site plan shows driveways to Buildings 300 and 400 as well as the unnamed two lane road crossing the stream buffers. The plan also shows a portion of a driveway and part of the driveway to Buildings 100 and 200 as well as a portion of the Building 200 truck court also intrude into the tributary stream buffers. Also, a drive accessing the Building 200 truck court and an unnamed area that may be stormwater detention run up to the edge of the Sweetwater Creek 150-foot setback.”

Other Environmental Comments

The project site and fronts both Sweetwater Creek and Sweetwater Creek State Park which is the most visited state park in Georgia.

The Georgia Department of Natural Resources Wildlife Resources Division submitted extensive comments on the project which are attached in full. The comments note that both federally listed and state protected species of concern have been documented in the vicinity of the project as considered by the Division. To minimize potential impacts to federally listed species, the Division recommended consultation with the United States Fish and Wildlife Service. They also recommended that surveys be conducted for the following species if suitable habitat is present: pink ladyslipper, yellow ladyslipper, bay star-vine, and Georgia aster. Survey results should be transmitted to the DNR office.

DNR Wildlife Resource Division recommendations include the following:

“The proposed project area is undeveloped and remains relatively undisturbed. We recommend completing surveys for species of concern before any construction activities begins. We strongly advocate leaving the ground undisturbed and natural vegetation intact where possible within the proposed project area.”

“This project occurs within a high priority watershed(s). As part of Georgia’s State Wildlife Action Plan (SWAP), high priority watersheds were identified to protect populations of high priority aquatic species, important coastal habitats, and migratory corridors for anadromous species. Please refer to Appendix F of Georgia’s SWAP to find out more specific information about the listed high priority watershed.”

“We are concerned about aquatic habitats that could be impacted by construction activities. To protect aquatic habitats and water quality, we recommend that all machinery be kept out of streams. Further, we

advocate leaving vegetation intact within 100 feet of streams, which will reduce inputs of sediments, assist with maintaining streambank integrity, and provide shade and habitat for aquatic species.”

“Due to the proximity of the proposed development to Sweetwater Creek and its tributaries, we strongly encourage coordination with the Environmental Protection Division of Georgia DNR to ensure that appropriate measures are taken to protect stream buffers and watershed integrity.”

“Because this area remains undeveloped and is directly adjacent to Sweetwater Creek State Park, we urge the applicant to consider preserving this site for conservation. The preservation of undeveloped parcels within the proposed project area for conservation should also be a consideration. Georgia DNR would be glad to explore management opportunities or agreements. We also encourage the use of land trusts.”

In addition to the extensive DNR comments above, there are several other environmental considerations related to regional environmental goals.

The project will require removal of large areas of native forest. Additional retention of existing trees would be desirable and in keeping with regional goals regarding carbon sequestration and climate change/heat island effect mitigation.

The project can further support The Atlanta Region's Plan in general by incorporating other aspects of regional stormwater policy, including green infrastructure and/or low-impact design, e.g., pervious pavers, rain gardens, vegetated swales, etc., in parking areas and site driveways, and as part of any improvements to site frontages.

Unified Growth Policy: Established Suburbs/Developing Rural Areas

The project site is split between Established Suburbs and Developing Rural Areas growth management designations.

Established Suburbs are areas where suburban development has occurred and are characterized by single-family subdivisions, commercial development, and office, industrial and multi-family development. These areas represent the part of the region that has recently reached “build-out.” With few remaining large parcels for additional development, these are the areas in which the region may see the least amount of land-use change outside of retail and commercial areas.

While there is still room for limited infill development, these areas will begin to focus more on redevelopment over the next 30 years. Preservation of existing single-family neighborhoods is important, and wholesale change will most likely not occur in the single-family subdivisions that make up a majority of these areas. However, infill and redevelopment will occur in areas of retail/commercial concentrations, especially commercial corridors.

Developing Rural Areas are areas where little to no development has taken place, but where there is development pressure. These areas are characterized by limited single-family subdivisions, large single-

family lots, agricultural uses, protected lands, and forests. The region should strive to protect these areas by limiting infrastructure investments to targeted areas and allowing no development or only low- intensity development. Limited existing infrastructure in these areas will constrain the amount of additional growth that is possible. Some transportation improvements may be needed in developing rural areas.

The intensity and land use of the proposed project partially align with The Atlanta Region's Plan's recommendations for Established Suburbs but are not aligned with Developing Rural Areas policies which call for no development or low-density development and protection of environmentally sensitive areas. Ideally the project could incorporate uses that are compatible with the adjacent Sweetwater Creek State Park. Douglas County leadership and staff, along with the applicant team, should collaborate closely to ensure maximum sensitivity to nearby local governments, neighborhoods, land uses and natural resources.

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

ATLANTA REGIONAL COMMISSION	GEORGIA DEPARTMENT OF NATURAL RESOURCE	GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS
GEORGIA DEPARTMENT OF TRANSPORTATION	GEORGIA REGIONAL TRANSPORTATION AUTHORITY	GEORGIA SOIL AND WATER CONSERVATION COMMISSION
GEORGIA ENVIRONMENTAL FINANCE AUTHORITY	GEORGIA CONSERVANCY	DOUGLAS COUNTY
FULTON COUNTY	COBB COUNTY	CITY OF DOUGLASVILLE
CITY OF SOUTH FULTON	THREE RIVERS REGIONAL COMMISSION	

If you have any questions regarding this review, please contact Andrew Smith at (470) 378-1645 or asmith@atlantaregional.org. This finding will be published to the ARC review website located at <http://atlantaregional.org/plan-reviews>.



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DRI #3515

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: Douglas County

Individual completing form: Philip Shafer

Telephone: 770-920-7313

E-mail: pshafer@douglascountyga.gov

*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: Strategic West Logistics Center IV - Douglas Hills

Location (Street Address, GPS Coordinates, or Legal Land Lot Description): 1011 Douglas Hills Road, Lithia Springs, GA (Douglas County). Land Lot 768, District 18, Section 2.

Brief Description of Project: Proposed 964,440 SF of industrial warehouse space in four (4) buildings, with associated parking and access roads, on an approximately 134.5-acre site.

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 checked="" type="radio"/> Wholesale & Distribution | <input type="radio"/> Attractions & Recreational Facilities | <input type="radio"/> Intermodal Terminals |
| <input type="radio"/> Hospitals and Health Care Facilities | <input type="radio"/> Post-Secondary Schools | <input type="radio"/> Truck Stops |
| <input type="radio"/> Housing | <input type="radio"/> Waste Handling Facilities | <input type="radio"/> Any other development types |
| <input type="radio"/> Industrial | <input type="radio"/> Quarries, Asphalt & Cement Plants | |

If other development type, describe:

Project Size (# of units, floor area, etc.): Total of 964,440 SF, in four (4) buildings on an approximately 134.5-acre site

Developer: Strategic Real Estate Partners, LLC

Mailing Address: 3715 Northside Parkway, Building 400, Suite 425

Address 2:

City: Atlanta State: GA Zip: 30327

Telephone: (404) 852-2214

Email: jyoung@strategicrepartners.com

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

If yes, property owner: Laurie Pereira, Byron Glisson, Fredrick Tallant, John & Patricia Wright, Larry Speights, Angelia Ree

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:

Project ID:

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

☒ Rezoning

☐ Variance

☐ Sewer

☐ Water

☐ Permit

☐ Other

Is this project a phase or part of a larger overall project?

(not selected)

Yes

No

If yes, what percent of the overall project does this project/phase represent?

Estimated Project Completion Dates:

This project/phase: 2024

Overall project: 2024

[Back to Top](#)



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DRI #3515

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: Douglas County
Individual completing form: Philip Shafer
Telephone: 770-920-7313
Email: pshafer@douglascountygga.gov

Project Information

Name of Proposed Project: Strategic West Logistics Center IV - Douglas Hills
DRI ID Number: 3515
Developer/Applicant: Strategic Real Estate Partners, LLC
Telephone: (404) 852-2214
Email(s): jyoung@strategicrepartners.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: \$115M

Estimated annual local tax revenues (i.e., property tax, sales tax) likely to be generated by the proposed development: \$1.15M

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: Douglasville-Douglas County Water Sewer Authority

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

0.09MGD

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:

Douglasville-Douglas County Water Sewer Authority

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

0.07MGD

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? 0.2 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.)

1,570 daily trips, 142 AM peak hour trips, 144 PM peak hour trips

Has a traffic study been performed to determine whether or not transportation or access improvements will be needed to serve this project?

☐ (not selected) ☒ Yes ☐ No

Are transportation improvements needed to serve this project?

☐ (not selected) ☒ Yes ☐ No

If yes, please describe below: Please refer to traffic study prepared by Kimly-Horn & Assoc.

Solid Waste Disposal

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

850 TPY

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?

34%

Describe any measures proposed (such as buffers, detention or retention ponds, pervious parking areas) to mitigate the project's impacts on stormwater management: Buffers along Sweetwater Creek will be maintained. Water quality pond and bioretention areas will be designed to treat the run-off from the development.

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:
The project is within 7 miles of a drinking water intake on Sweetwater Creek. The watershed protection buffers will be maintained. Proposed wetland and stream impacts will be permitted with the USACE. 100-year flood plain is located on the site, but no impacts are proposed.

[Back to Top](#)

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

DRI INFORMATION

DRI Number #3515

DRI Title Strategic West Logistics Center IV- Douglas Hills

County Douglas County

City (if applicable)

Address / Location Along Douglas Hill Road and Bullard Road

Proposed Development Type: It proposed to develop a 964,440 SF warehousing space on approximately 134.5-acre site.

Build Out: 2024

Review Process ☐ EXPEDITED

☒ NON-EXPEDITED

REVIEW INFORMATION

Prepared by ARC Transportation Access and Mobility Division

Staff Lead Aries Little

Copied Marquitrice Mangham

Date February 1, 2022

TRAFFIC STUDY

Prepared by Kimley-Horn

Date February 24, 2022

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*)

Table 9 illustrates a list of projects in the fiscally constrained RTP. However, there are some additional advisements concerning the table. The RTP's project sheets references project DO-299/PI 0010821 ROW phase in FY 2024 and UTL/CST in LR 2026-2030. Project AR-ML-800/PI 0013916 PE phase is referenced in 2018/LR 2026-2030, ROW phase in LR 2026-2030/2031-2040, and CST phase in LR 2041-2050.

☐ NO (*provide comments below*)

REGIONAL NETWORKS

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

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

☐ NO

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

Site Driveway A and Site Driveway B are located on Douglas Hill Road. Douglas Hill Road is accessed via SR 6/Thornton Road, which is identified as a Regional Thoroughfare. Douglas Hill Road can also be accessed from Factory Shoals Road which intersects to SR 6/Thornton Road.

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*)

Site Driveway A and Site Driveway B are located on Douglas Hill Road. Douglas Hill Road is accessed via SR 6/Thornton Hill Road, which is identified as a Regional Truck Route. Douglas Hill Road can also be accessed from Factory Shoals Road which intersects SR 6/Thornton Road.

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

- Walking Access* ☐ 0.50 to 1.00 mile
☐ 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) [Click here to enter name of operator\(s\).](#)

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

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

☐ 0.10 to 0.50 mile

☐ 0.50 to 1.00 mile

Walking Access* ☐ Sidewalks and crosswalks provide sufficient connectivity

☐ Sidewalk and crosswalk network is incomplete

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

[Click here to provide comments.](#)

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

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

☐ Route uses high volume and/or high speed streets

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

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

07. Does a transit agency which provides rail and/or fixed route bus service operate anywhere within the jurisdiction in which the development site is located?

Access between major developments and transit services provide options for people who cannot or prefer not to drive, expand economic opportunities by better connecting people and jobs, and can help reduce traffic congestion. If a transit agency operates within the jurisdiction and a comprehensive operations plan update is undertaken, the agency should give consideration to serving the site during the evaluation of future routes, bus stops and transfer facilities. If the nature of the development is amenable to access by transit, walking or bicycling, but direct service to the site is not feasible or cost effective, the transit agency and local government(s) should ensure good walking and bicycling access accessibility is provided between the development and any routes within a one mile radius. The applicable local government(s) is encouraged to make these connections a funding priority for future walking and bicycling infrastructure improvements.

☐ NO

☒ YES

Connect Douglas provides fixed route bus service within the jurisdiction.

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: *Sidewalks will be provided adjacent to the buildings and will connect to the accessible and non-accessible spaces.*

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):

STRATEGIC WEST LOGISTICS CENTER IV DOUGLAS HILLS DRI
Douglas County
Natural Resources Group Review Comments
January 31, 2022

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 project property is located in the portion of the Chattahoochee River watershed drains into the Chattahoochee River Corridor, but it is not within the 2000-foot Chattahoochee River Corridor and is not subject to the requirements of the Metropolitan River Protection Act or the Chattahoochee Corridor Plan. This portion of the watershed drains into the Chattahoochee downstream of the existing public water supply intakes on the Chattahoochee. However, proposed intakes in South Fulton and Coweta County would include this portion of the Chattahoochee River watershed as a large water supply watershed (over 100 square miles), as defined under the Part 5 Criteria of the 1989 Georgia Planning Act. However, 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 the nearest proposed public water supply intake.

The property is also located in the Sweetwater Creek Water Supply Watershed, which is also a large (over 100 square miles) water supply watershed as defined under the Part 5 Criteria of the 1989 Georgia Planning Act.

For both the Chattahoochee and Sweetwater Creek Water Supply Watersheds, 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. The project property is more than seven miles upstream of the proposed Chattahoochee intakes, but is within seven miles upstream of the City of East Point Intake on Sweetwater Creek. The City of East Point's Sparks Reservoir is located in the basin of a tributary to Sweetwater Creek and receives no direct flow from Sweetwater Creek or the rest of the Sweetwater watershed. This project is not in the Sparks Reservoir watershed.

Stream Buffers

The USGS coverage for the project area and the submitted site plan both show Sweetwater Creek running along most of the northern boundary of the property. In addition, both the USGS coverage and the site plan show unnamed blue-line tributary to Sweetwater running along the northeastern portion of the property, starting entirely within the property boundaries and then running along the property boundary until it cuts across the northernmost portion of the property to flow into Sweetwater Creek. The site plan shows and identifies the 100-foot undisturbed buffer and additional 50-foot impervious surface setback required by the County along Sweetwater Creek. However, the State 25-foot State Erosion and Sedimentation Control buffer is not shown along Sweetwater Creek. Along the tributary, it appears that the 50-foot undisturbed buffer and additional 25-foot impervious setback required by the Douglas County Stream Buffer Ordinance and the State 25-foot State Erosion and Sedimentation Control buffer are shown but not identified between the tributary headwaters and the point where an unnamed two lane road crosses the stream. Between that point and Sweetwater Creek, the 50-foot undisturbed buffer and the State 25-foot buffer are shown and identified, but the additional 25-foot impervious surface setback is not shown. The site plan shows driveways to Buildings 300 and 400 as well as the unnamed two lane road crossing the stream buffers. The plan also shows a portion of a driveway and part of the driveway to Buildings 100 and 200 as well as a portion of the Building 200 truck court also intrude into the tributary stream buffers. Also, a drive accessing the Building 200 truck court and an unnamed area that may be stormwater detention run up to the edge of the Sweetwater Creek 150-foot setback.

Strategic West Logistics Center IV Douglas Hills DRI
ARC Natural Resources Group Comments
January 31, 2022
Page Two

All buffers need to be clearly identified, the 75-foot setback needs to be shown all along the tributary to Sweetwater and the 25-foot State Erosion and Sedimentation buffer needs to be shown along Sweetwater Creek.

All intrusions into the buffers may require variances under the both the County Stream Buffer Ordinance and the State 25-foot State Erosion and Sedimentation Control buffer. Any unmapped streams on the property may also be subject to the County buffer ordinance. Any unmapped State waters identified on the property may also be subject to the State 25-foot Sediment and Erosion Control buffer.

Stormwater/Water Quality

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

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

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



MARK WILLIAMS
COMMISSIONER

TED WILL
DIRECTOR

February 18, 2022

Donald Shockey
Plan Review Manager
Atlanta Regional Commission
229 Peachtree Street NE
Suite 100
Atlanta, GA 30303

Subject: Known occurrences of natural communities, plants, and animals of highest priority conservation status on or near 2022 Strategic West Logistic Center IV - Douglas Hills - DRI 3515 in Douglas County, GA

Dear Donald Shockey:

This is in response to your request on February 3, 2022. The following Georgia natural heritage database element occurrences (EOs) were selected for the current site using the local Hydrologic Unit Code (HUC) 10 watershed for elements whose range distribution is limited by aquatic systems (AQ) and within 3 miles for all other EOs (TR).

2022 Strategic West Logistic Center IV - Douglas Hills (-84.616214, 33.759651, WGS84)

- GA *Cambarus howardi* (Chattahoochee Crayfish) [Historic] in Nickajack Creek (AQ), approx. 7.1 mi NE of site
- GA *Cambarus howardi* (Chattahoochee Crayfish) [Historic?] in Sweetwater Creek (AQ), approx. 0.3 mi S of site
- GA *Cyprinella callitaenia* (Bluestripe Shiner) in Chattahoochee River (AQ), approx. 8.2 mi NE of site
- GA *Cypripedium acaule* (Pink Ladyslipper) (TR), approx. 0.6 mi S of site
- GA *Cypripedium acaule* (Pink Ladyslipper) (TR), approx. 0.6 mi SW of site
- GA *Cypripedium parviflorum* (Yellow Ladyslipper) [Historic?] (TR), approx. 1.7 mi S of site
- GA *Haliaeetus leucocephalus* (Bald Eagle) (TR), approx. 0.9 mi W of site
- US *Medionidus penicillatus* (Gulf Moccasinshell) [Historic] in Chattahoochee River (AQ), approx. 2.3 mi E of site
- Micropterus cataractae* (Shoal Bass) in Sweetwater Creek (AQ), approx. 0.3 mi NE of site
- Micropterus cataractae* (Shoal Bass) in Sweetwater Creek (AQ), approx. 0.6 mi S of site
- GA *Notropis hypsilepis* (Highscale Shiner) in Sweetwater Creek (AQ), approx. 14.7 mi W of site
- GA *Notropis hypsilepis* (Highscale Shiner) [Historic] in Powder Springs Creek (AQ), approx. 5.9 mi NW of site
- GA *Notropis hypsilepis* (Highscale Shiner) [Historic] in Sweetwater Creek (AQ), approx. 2.3 mi N of site

Panax quinquefolius (American Ginseng) (TR), approx. 2.4 mi S of site
Pseudacris brachyphona (Mountain Chorus Frog) (TR), approx. 0.8 mi S of site
Satyrium kingi (King's Hairstreak) (TR), approx. 1.2 mi S of site
 GA *Schisandra glabra* (Bay Star-vine) (TR), approx. 2.4 mi S of site
 GA *Schisandra glabra* (Bay Star-vine) (TR), approx. 1.0 mi SW of site
 GA *Symphyotrichum georgianum* (Georgia Aster) (TR), approx. 1.0 mi E of site
 Conservation Easement/Covenant 2011075 [Georgia Land Trust] (TR), approx. 2.0 mi SE of site
 Conservation Easement/Covenant 2013054 [Georgia Land Trust] (TR), approx. 2.9 mi S of site
 Ingram [City of Atlanta] (TR), approx. 2.7 mi N of site
 Landrum [City of Atlanta] (TR), approx. 2.5 mi N of site
SWEETWATER CREEK SP [Georgia Department of Natural Resources] (TR), within immediate vicinity of site
 SWEETWATER CREEK SP [Georgia Department of Natural Resources] (TR), approx. 0.6 mi W of site
 Teague [City of Atlanta] (TR), approx. 2.8 mi N of site
 Wren Circle Park [Douglas County] (TR), approx. 2.6 mi N of site
Chattahoochee River Lower North 8 (0313000201) [SWAP High Priority Watershed] (TR), on or within immediate vicinity of site
 Chattahoochee River Lower North 7 (0313000203) [SWAP High Priority Watershed] (TR), approx. 2.6 mi S of site

Recommendations:

Federally listed species have been documented within three miles or within the watershed(s) of the proposed project. To minimize potential impacts to federally listed species, we recommend consultation with the United States Fish and Wildlife Service. Please email GAES_Assistance@fws.gov for project consultation and survey recommendations.

Please be aware that state protected species have been documented near the proposed project. Due to the proximity of this site to a natural area (Sweetwater Creek State Park), we recommend surveys be conducted for the following species if suitable habitat is present: pink ladyslipper (*Cypripedium acaule*), yellow ladyslipper (*Cypripedium parviflorum*), bay star-vine (*Schisandra glabra*), and Georgia aster (*Symphyotrichum georgianum*). Survey results should be transmitted to our office. For information about these species, including survey recommendations, please visit our webpage at <http://georgiawildlife.com/conservation/species-of-concern#rare-locations>.

The following biologists can provide additional recommendations and assistance regarding the following groups:

Plants: Lisa Kruse (Lisa.Kruse@dnr.ga.gov)
 Fishes: Paula Marcinek (Paula.Marcinek@dnr.ga.gov)
 Crayfish: Brett Albanese (Brett.Albanese@dnr.ga.gov)
 Mussels: Matt Rowe (Matt.Rowe@dnr.ga.gov)
 Reptiles & Amphibians: Daniel Sollenberger (Daniel.Sollenberger@dnr.ga.gov)
 Mammals: Trina Morris (Katrina.Morris@dnr.ga.gov)
 Birds: Nathan Klaus (Nathan.Klaus@dnr.ga.gov) or Tim Keyes (Tim.Keyes@dnr.ga.gov)

Species listed above that have no “GA” or “US” status are considered Georgia species of concern. Locations of these species are tracked until enough information is gathered to determine if they should be added to the state list or if their populations do not warrant tracking. It is important to consider these species when planning projects. Please let us know if you have any questions regarding Georgia species of concern.

There is a record of a nesting bald eagle (*Haliaeetus leucocephalus*) within three miles of the proposed project site. Although bald eagles are no longer listed as federally endangered, this species is still protected by the Migratory Bird Treaty Act, the Bald and Golden Eagle Protection Act, and the Georgia Endangered Species Act. This legislation continues to protect bald eagles from potentially harmful human activities. For more information on how to prevent impacts to bald eagles, please review the National Bald Eagle Management Guidelines and other information located at: <https://www.fws.gov/birds/management/managed-species/eagle-management.php>.

A “Candidate Conservation Agreement” was recently signed for Georgia aster. This voluntary commitment to protect the species and its necessary habitat can be referenced at: https://www.fws.gov/asheville/pdfs/GA-Aster_CandidateConservationAgreement.pdf.

We have the following recommendations for the applicant to consider. The proposed project area is undeveloped and remains relatively undisturbed. We recommend completing surveys for species of concern before any construction activities begins. We strongly advocate leaving the ground undisturbed and natural vegetation intact where possible within the proposed project area. We recommend that stringent erosion control practices be used during construction activities and that vegetation is re-established on disturbed areas as quickly as possible. Silt fences and other erosion control devices should be inspected and maintained until soil is stabilized by vegetation. Please use natural vegetation and grading techniques (e.g. vegetated swales, turn-offs, vegetated buffer strips) that will ensure that the project site does not serve as a conduit for stormwater or pollutants into the watershed during or after construction. These measures will help protect water quality near the project as well as in downstream areas.

This project occurs within a high priority watershed(s). As part of Georgia’s State Wildlife Action Plan (SWAP), high priority watersheds were identified to protect populations of high priority aquatic species, important coastal habitats, and migratory corridors for anadromous species. Please refer to Appendix F of Georgia’s SWAP to find out more specific information about the listed high priority watershed(s) (<https://georgiawildlife.com/wildlifeactionplan>).

We are concerned about aquatic habitats that could be impacted by construction activities. To protect aquatic habitats and water quality, we recommend that all machinery be kept out of streams. Further, we advocate leaving vegetation intact within 100 feet of streams, which will reduce inputs of sediments, assist with maintaining streambank integrity, and provide shade and habitat for aquatic species. Due to the proximity of the proposed development to Sweetwater Creek and its tributaries, we strongly encourage coordination with the Environmental Protection Division of Georgia DNR to ensure that appropriate measures are taken to protect stream buffers and watershed integrity. Please contact Michael Berry (Michael.Berry@dnr.ga.gov) for more information.

Because this area remains undeveloped and is directly adjacent to Sweetwater Creek State Park, we urge the applicant to consider preserving this site for conservation. The preservation of undeveloped parcels within the proposed project area for conservation should also be a consideration. Georgia DNR would be glad to explore management opportunities or agreements. We also encourage the use of land trusts. Please visit our website at www.georgiawildlife.com for more information on conservation opportunities in the state.

Disclaimer:

Please keep in mind the limitations of our database. The data collected by the Wildlife Conservation Section comes from a variety of sources, including museum and herbarium records, literature, and reports from individuals and organizations, as well as field surveys by our staff biologists. In most cases the information is not the result of a recent on-site survey by our staff. Many areas of Georgia have never been surveyed thoroughly. Therefore, the Wildlife Conservation Section can only occasionally provide definitive information on the presence or absence of rare species on a given site. Our files are updated constantly as new information is received. **Thus, information provided by our program represents the existing data in our files at the time of the request and should not be considered a final statement on the species or area under consideration.**

If you know of populations of highest priority species that are not in our database, please fill out the appropriate data collection form and send it to our office. Forms can be obtained through our web site (<http://georgiawildlife.com/conservation/species-of-concern#rare-locations>) or by contacting our office. If we can be of further assistance, please let us know.

Sincerely,



Maggie Aduddell Hunt, Wildlife Biologist
maggie.hunt@dnr.ga.gov, (706) 557-3228

Data Available on the Wildlife Conservation Section Website

- Georgia protected plant and animal species profiles are available on our website. These profiles cover basics such as species physical descriptions, preferred habitat, and life history, as well as threats, management recommendations, and conservation status. To view these profiles, visit: <http://georgiawildlife.com/conservation/species-of-concern#rare-locations>
- Rare species and natural community information can be viewed by Quarter Quad, County, and HUC 8 Watershed. To access this information, please visit our GA Rare Species and Natural Community Information page at: <http://georgiabiodiversity.org/>
- Downloadable files of rare species and natural community data by Quarter Quad and County are also available. These can be downloaded at: <http://georgiabiodiversity.org/natels/natural-element-locations.html>

