

## **REGIONAL REVIEW NOTIFICATION**

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

**DATE**: April 26, 2022

TO:Mayor J. Clark Boddie, City of PalmettoATTN TO:Cindy Hanson, City Clerk, City of PalmettoRE:Development of Regional Impact ReviewFROM:Mike Alexander, Center for Livable Communities, Atlanta Regional Commission

ARC has completed a preliminary 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 preliminary report does not address whether the DRI is or is not in the best interest of the local government.

Name of Proposal: Merrill Park DRI 3488 Submitting Local Government: City of Palmetto Date Opened: April 26, 2022 Deadline for Comments: May 11, 2022 Date to Close: May 16, 2022

**Description:** A DRI review of a proposal to build a mixed-use community on approximately 1,341 acres in the City of Palmetto off of Cochran Mill Road. The site is currently mostly undeveloped with natural forest and streams and wetlands. The development plan proposes: 4,680 residential units (1,668 single family detached homes, 2,053 townhomes, and 959 multifamily units); 420,000 SF of office space; 180,000 SF of retail space; a 1,000-student elementary school; 60,000 SF of community amenity space; a 30,000-SF police and fire facility; and a 15,000-SF worship center. Roughly 610 acres of the total site area are planned for parks, watershed protection areas, passive recreation areas, and open space. Site access is proposed via approximately 15 entry points distributed around the community, connecting to existing roadways. Local DRI review triggers include a land disturbance permit application and water/sewer connection applications. The expected buildout year is 2029.

#### PRELIMINARY COMMENTS:

#### Key Comments

The project is partially aligned with applicable Developing Rural Areas policy recommendations which note: "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 designation of approximately 610 out of the total 1,341 acres for parks, conservation, recreation areas is highly aligned with Developing Rural Areas policies and goals; preservation of additionally environmentally sensitive and forested areas would further this alignment.

A modified-grid street pattern is proposed in the central areas, but the village edge areas utilize a somewhat disconnected street pattern with numerous cul-de-sacs. Adjustment of this pattern to provide better automobile and pedestrian connectivity would be supportive of regional transportation and sustainability policies.

The project is expected to generate 41,230 new daily vehicular trips. Responsibility for funding and implementing associated proposed roadway improvements, particularly those outside the city of Palmetto, in a manner that respects the existing rural character will require careful discussion and cooperation by affected jurisdictions.

Project access proposed along Cochran Mill Road, a State Scenic Byway, will need to ensure the preservation of the road's character as a State Scenic Byway.

The proposed comprehensive internal multi-use trail and sidewalk system is strongly supportive of regional transportation and sustainability goals.

No intrusions are proposed into mapped stream buffer and wetlands areas which is strongly supportive of regional natural resource and water quality policies.

The proposed Commercial/Office area around the Village Park is strongly supportive of regional development pattern goals; inclusion of some residential uses would further support these policies.

The project includes a new Fire and Police Station which will require substantial coordination with City of Palmetto and other affected parties regarding funding, service capacities, and implementation.

### **General Comments**

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

The project includes a proposed new Fire and Police Station which will require substantial coordination with City of Palmetto and other affected parties regarding funding, capacities, and implementation.

The project will impact the general existing rural character of the area and careful attention to this preserving this character as much as possible will be needed in finalizing all aspects of the project. The project area is served by existing two-lane roadways including Cochran Mill Road, a designated State Scenic Byway. The existing roadway infrastructure is inadequate for the size of the development. Access should be

limited, where applicable, along Cochran Mill and "viewsheds" protected to ensure the preservation of the road as a Scenic Byway.

The proposed Commercial/Office area around the Village Park and Amphitheatre creates a functional higher density core which can serve the project and surrounding residents and is strongly supportive of regional development pattern goals. The inclusion of some residential uses in this specific area to take advantage of increased walkability and access afforded by direct adjacency would further support these goals.

#### **Transportation and Mobility Comments**

ARC's Transportation and Mobility Group comments are attached.

The project is expected to generate 41,230 new daily vehicular trips and numerous associated roadway improvements are proposed.

A modified-grid curvilinear street pattern is proposed in the more central area but the village edge areas on the west side of the project utilize a somewhat disconnected street pattern with numerous cul-de-sacs which discourage walkability and connectivity. Adjustment of this street pattern to provide better automobile and pedestrian connectivity would be supportive of regional transportation and sustainability goals and policies.

The project is served by existing two-lane roadways including Cochran Mill Road, a designated State Scenic Byway. Access should be limited, where applicable, along Cochran Mill and "viewsheds" protected to ensure the preservation of the road as a Scenic Byway.

The project is expected to generate 41,230 new daily vehicular trips. Responsibility for implementing associated proposed roadway improvements, particularly those outside the city of Palmetto, in a manner that respects the existing rural character of the area will require careful discussion and cooperation by affected jurisdictions.

Opportunities for alternative transportation modes are limited by the rural location but the proposed comprehensive internal multi-use trail and sidewalk system is strongly supportive of regional transportation and sustainability goals. Ensuring that the system optimally connects with external pedestrian routes and destinations will further support these goals.

Care should be taken to ensure that the constructed development provides 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 Comments**

ARC's Natural Resource Group comments are attached.

The project site falls within an area that may be affected by a proposed new water intake on the Chattahoochee River. The proposed intake would be at or near Bear Creek in Chattahoochee Hills and would serve the southern portions of Fulton County. Once an intake location is approved on the Chattahoochee, the land in the watershed upstream of the intake would be classified as a large water supply watershed (over 100 square miles), as defined under the Part 5 Criteria of the 1989 Georgia Planning Act. However, the Part 5 criteria are minimal for large water supply watersheds with direct river intakes, consisting of limits on hazardous material storage within seven miles upstream of the intake.

The USGS coverage for the project area shows Little Bear Creek, Cedar Branch and numerous unnamed tributaries throughout the project property. The submitted project site plan shows these streams, as well as several smaller tributaries throughout the property. All show the 50-foot undisturbed buffer and the additional 25-foot impervious surface setback required under the City of Palmetto Stream Buffer Ordinance. The State 25-foot Erosion and Sedimentation Buffer is also shown. No intrusions into any of the buffers are shown. Any unmapped streams may also be subject to the Palmetto Stream Buffer Ordinance. Any other waters of the State on the property are also subject to the 25-foot state Erosion and Sedimentation Act buffers.

#### **Environmental Comments**

The proposed retention of 610 of the projects 1,341 acres for park, open space and conservation areas is highly supportive of regional environmental goals. Retention of some additional natural wooded areas would be in keeping with regional policies regarding carbon sequestration and heat island mitigation. The project can further support The Atlanta Region's Plan by incorporating other aspects of regional environmental 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: Developing Rural Areas

This DRI site falls under the UGPM Developing Rural Areas designation which denotes areas in the region 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.

City of Palmetto leadership and staff, along with the applicant team, should collaborate closely to ensure absolute 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 Transportation GEORGIA DEPARTMENT OF NATURAL RESOURCE GEORGIA REGIONAL TRANSPORTATION AUTHORITY

GEORGIA ENVIRONMENTAL FINANCE AUTHORITY FULTON COUNTY COWETA COUNTY GEORGIA CONSERVANCY CITY OF CHATTAHOOCHEE HILLS DOUGLAS COUNTY GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS GEORGIA SOIL AND WATER CONSERVATION COMMISSION

CITY OF PALMETTO CITY OF SOUTH FULTON

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





Developer: WHM Chattahoochee Hills Investments, LLC

Mailing Address: 8000 Capps Ferry Road

Address 2:

City:Douglasville State: GA Zip:30135

Telephone: 678-777-3506

Email: whmerrill@foxhallresort.com

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

If yes, property owner:

Is the proposed project entirely

located within your local (not selected) Yes No government's jurisdiction?

DRI Initial Information Form

previous DRI?		
If yes, provide the following	Project Name: Foxhall Village	
information:	Project ID: 1841	
	Rezoning	
The initial action being requested	Variance	
of the local government for this project:	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	This project/phase: 2022	
	Overall project: 2029	

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DRI Site Map | Contact





What is the estimated water 1.6 supply demand to be generated by the project, measured in Millions of Gallons Per Day (MGD)?			
Is sufficient water supply capacity available to serve the proposed project?	(not selected) Yes No		
If no, describe any plans to e	xpand the existing water supply capacity:		
Is a water line extension required to serve this project?	(not selected) Yes No		
If yes, how much additional I 1.25 miles of 12" water main	ine (in miles) will be required? to loop system		
	Wastewater Disposal		
Name of westswater			
Name of wastewater treatment provider for this site:	Fulton County		
What is the estimated			
sewage flow to be generated by the project, measured in Millions of Gallons Per Day (MGD)?	1.5		
Is sufficient wastewater			
treatment capacity available to serve this proposed project?	(not selected) Yes No		
If no, describe any plans to e County Sanitary Sewer Study	xpand existing wastewater treatment capacity: Merrill Park is included in the South Fulton /		
Is a sewer line extension required to serve this project?	(not selected) Yes No		
	ne (in miles) will be required?Merrill Park is included in the Fulton County expansion		
	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.)	41,230 daily trips (2 way)		
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	Transportation Impact Study will describe required transportation improvements.		
	Solid Waste Disposal		
How much solid waste is the			
project expected to generate annually (in tons)?	6,509		
Is sufficient landfill capacity available to serve this proposed project?	(not selected) Yes No		
If no, describe any plans to e	xpand existing landfill capacity:		
Will only bozordous wests			
Will any hazardous waste be generated by the development?	(not selected) Yes No		
lf yes, please explain:			
	Stormwater Management		

What percentage of the site 70% is projected to be impervious surface once the

#### **Environmental Quality**

Is the development located within, or likely to affect any of the following:

proposed development has been constructed?

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
	uestion above, describe how the identified resource(s) may be affected: and floodplain to roadways and infrastructure.
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regional impact + local relevance

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

#### **DRI INFORMATION**

DRI Number	#3488
DRI Title	Merrill Park Mixed-Use Development
County	Fulton County
City (if applicable)	City of Palmetto
Address / Location	Southeast of Cochran Mill Road/Wilkerson Mill Road and to the northwest and southwest of Rico Tatum Road/Cochran Mill Road
Proposed Developme	<b>nt Type:</b> It is proposed to develop 1,541 single-family detached units, 1,999 single-family attached units, 960 multifamily units, 1,000 student elementary school, 15,000 sf worship center, 420,000 sf of office space, and 180,000 sf of retail space.
	Build Out: 2032
<b>Review Process</b>	EXPEDITED
	NON-EXPEDITED
REVIEW INFORMATI	<u>ON</u>
Prepared by	ARC Transportation Access and Mobility Division
Staff Lead	Aries Little
Copied	Marquitrice Mangham
Date	March 18, 2022
TRAFFIC STUDY	

#### TRAFFIC STUDY

Prepared by	A&R Engineering Inc.
Date	March 17, 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)

A list of projects is illustrated on Table 5 of page 34.

NO (provide comments below)

Click here to provide comments.

#### **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)

There are five full access driveways proposed on Cochran Mill Road, three full access driveways on Phillips Road, one full access driveway on Wilkerson Mill Road, three full access driveways on Atlanta Newnan Road, and eleven full access driveways on Rico Tatum Road. Although the proposed access points are not directly served by a Regional Thoroughfare, Cochran Mill Road and Wilkerson Mill Road both provide access to two different Regional Thoroughfares which are SR 70 and SR 14, respectively. 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)

None of the identified access points are directly served by a Regional Truck Route. However, one of the access points located on Wilkerson Mill Road provides access to SR 14 which is identified as a Regional Truck Route.

# 04. If the development site is within one mile of an existing rail service, provide information on accessibility conditions.

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

NOT APPLICABLE (nearest station more than one mile away)

RAIL SERVICE WITHIN ONE MILE (provide additional information below)

Operator / Rail Line	
Nearest Station	Click here to enter name of operator and rail line
Distance*	Within or adjacent to the development site (0.10 mile or less)
	0.10 to 0.50 mile
	0.50 to 1.00 mile
Walking Access*	Sidewalks and crosswalks provide sufficient connectivity
	Sidewalk and crosswalk network is incomplete
	Not applicable (accessing the site by walking is not consistent wit the type of development proposed)

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	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.

ca jo bi lo	nnot or prefer not to driv bs, and can help reduce co cycling between the devel	lopments and transit services provide options for people who e, expand economic opportunities by better connecting people and ongestion. If a transit service is available nearby, but walking or lopment site and the nearest station is a challenge, the applicable uraged to make the connection a funding priority for future structure improvements.
$\square$	NOT APPLICABLE (neare	st bus, shuttle or circulator stop more than one mile away)
	SERVICE WITHIN ONE M	ILE (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

MARTA operates within the jurisdiction of the development.

08. If the development site is within one mile of an existing multi-use path or trail, provide information on accessibility conditions.

Access between major developments and walking/bicycling facilities provide options for people who cannot or prefer not to drive, expand economic opportunities by better connecting people and jobs, and can help reduce traffic congestion. If connectivity with a regionally significant path or trail is available nearby, but walking or bicycling between the development site and those facilities is a challenge, the applicable local government(s) is encouraged to make the route a funding priority for future walking and bicycling infrastructure improvements.

NOT APPLICABLE (nearest path or trail more than one mile away)

YES (provide additional information below)

Name of facility	Click here to provide name of facility.
Distance	Within or adjacent to development site (0.10 mile or less)
	0.15 to 0.50 mile
	0.50 to 1.00 mile
Walking Access*	Sidewalks and crosswalks provide connectivity
	Sidewalk and crosswalk network is incomplete
	Not applicable (accessing the site by walking is not consistent with the type of development proposed)
Bicycling Access*	Dedicated lanes or cycle tracks provide connectivity
	Low volume and/or low speed streets provide connectivity

Route uses high volume and/or high-speed streets

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

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

#### **OTHER TRANSPORTATION DESIGN CONSIDERATIONS**

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

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

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

### **10.** Does the site plan enable pedestrians and bicyclists to move between destinations within the development site safely and conveniently?

The ability for walkers and bicyclists to move within the site safely and conveniently reduces reliance on vehicular trips, which has congestion reduction and health benefits. Development site plans should incorporate well designed and direct sidewalk connections between all key destinations. To the extent practical, bicycle lanes or multiuse paths are encouraged for large acreage sites and where high volumes of bicyclists and pedestrians are possible.

- YES (sidewalks provided on all key walking routes and both sides of roads whenever practical and bicyclists should have no major issues navigating the street network)
- PARTIAL (some walking and bicycling facilities are provided, but connections are not comprehensive and/or direct)
- NO (walking and bicycling facilities within the site are limited or nonexistent)
  - ] NOT APPLICABLE (the nature of the development does not lend itself to internal walking and bicycling trips)
- OTHER (*Please explain*)

The site plan illustrates a multi-use trail throughout the development but the pedestrian crossings to access other parcels of the development are not clear. The traffic study indicates that sidewalks will be provided throughout the development, but the site plan does not clearly define the sidewalks.

**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)

The site plan illustrates the ability to connect the development's trail to the future regional trail system. Otherwise, there were no clearly defined bike/ped facilities referenced on the site plan promoting connections with adjacent parcels.

- 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)
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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):

### MERRILL PARK DRI City of Palmetto Natural Resources Group Review Comments April 12, 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 City and State regulations that could apply to this property. Other regulations may also apply that we have not identified.

#### **Watershed Protection**

The project is in the portion of the Chattahoochee River watershed drains into the 2000-foot Chattahoochee River Corridor, but it is not within Corridor and is not subject to the requirements of the Metropolitan River Protection Act or the Chattahoochee Corridor Plan. While this portion of the Chattahoochee watershed is downstream of the existing public water supply intakes on the Chattahoochee, there are two proposed intakes that may affect the project area. The final locations have not been determined for either proposed intake. One intake would serve Coweta County and may be located in Coweta or the southern portion of Fulton County. The second proposed intake would be at or near Bear Creek in Chattahoochee Hills and would serve the southern portions of Fulton County. Once an intake location is approved on the Chattahoochee, the land in the watershed upstream of the intake would be classified as a large water supply watershed (over 100 square miles), as defined under the Part 5 Criteria of the 1989 Georgia Planning Act. However, the Part 5 criteria are minimal for large water supply watersheds with direct river intakes, consisting of limits on hazardous material storage within seven miles upstream of the intake.

The location of the proposed Chattahoochee River intake near Bear Creek has not been finalized. If it is located downstream of Bear Creek, all land upstream, including Bear Creek, would be in a large water supply watershed and the same Part 5 criteria would apply. At this time, we are unaware of any definite plans for off-line storage for the proposed Bear Creek intake., so no additional Part 5 criteria would apply.

#### **Stream Buffers**

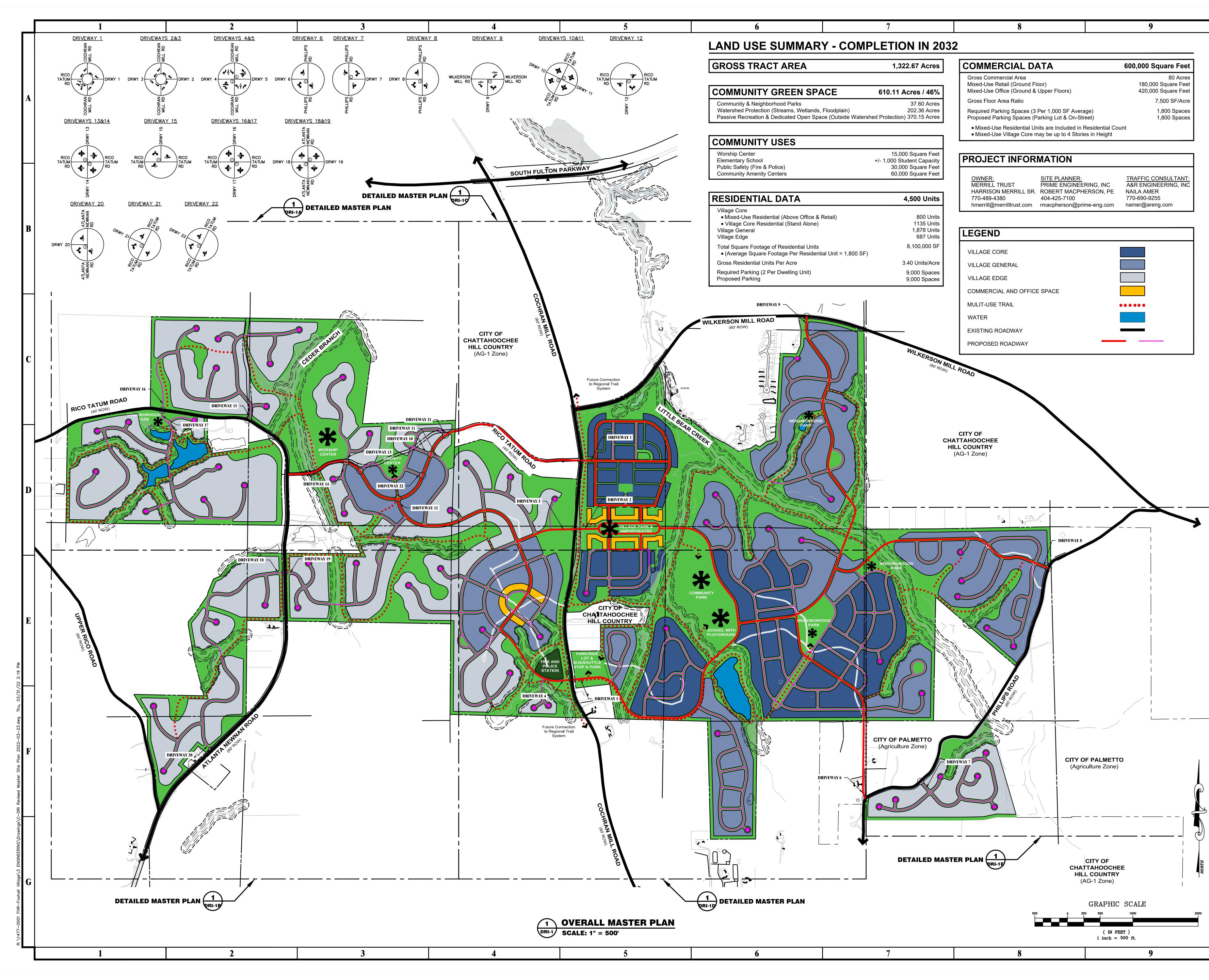
The USGS coverage for the project area shows Little Bear Creek, Cedar Branch and numerous unnamed tributaries throughout the project property. The submitted project site plan shows these streams, as well as several smaller tributaries throughout the property. All show the 50-foot undisturbed buffer and the additional 25-foot impervious surface setback required under the City of Palmetto Stream Buffer Ordinance. The State 25-foot Erosion and Sedimentation Buffer is also shown. No intrusions into any of the buffers are shown. Any unmapped streams may also be subject to the Palmetto Stream Buffer Ordinance. Any other waters of the State on the property are also subject to the 25-foot state Erosion and Sedimentation Act buffers.

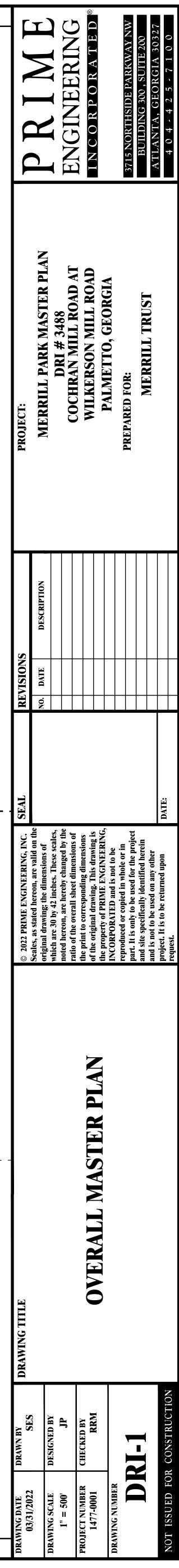
#### **Stormwater/Water Quality**

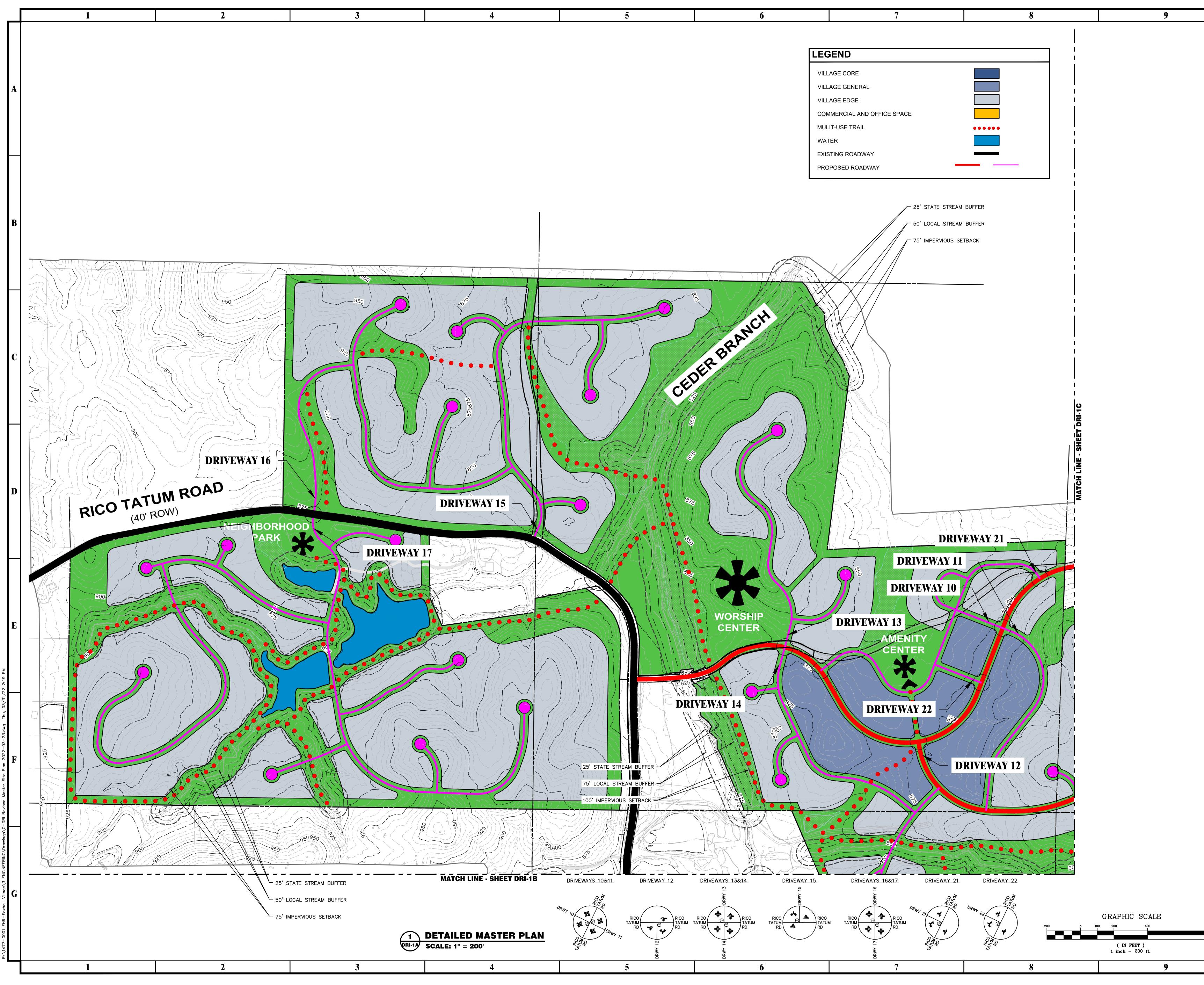
The project should adequately address the impacts of the proposed development on stormwater runoff and downstream water quality.

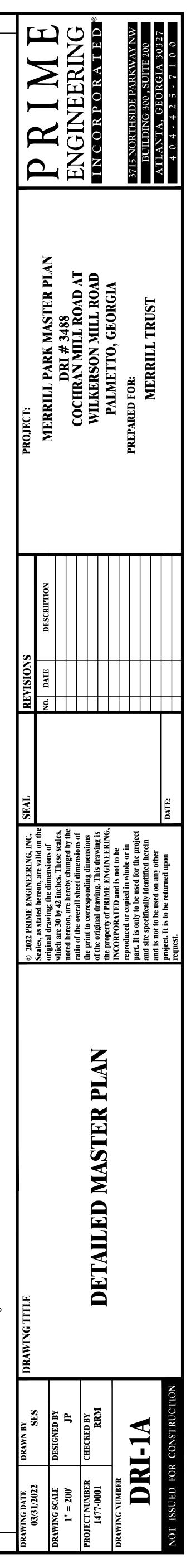
During the planning phase, the stormwater management system (system) should meet the requirements of the local jurisdiction's post-construction (or post-development) stormwater management ordinance. The system should be designed to prevent increased flood damage, streambank channel erosion, habitat degradation 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.

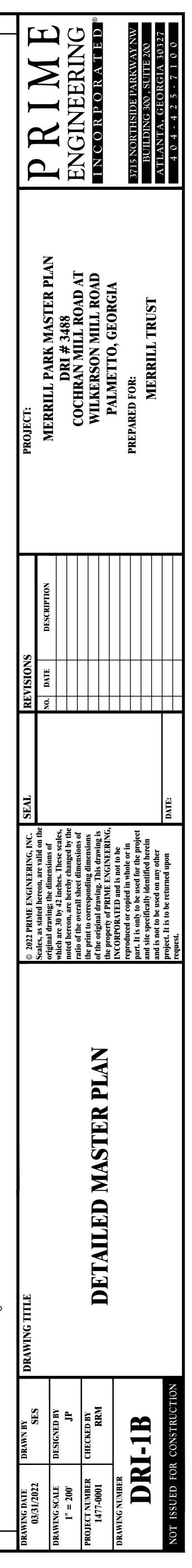


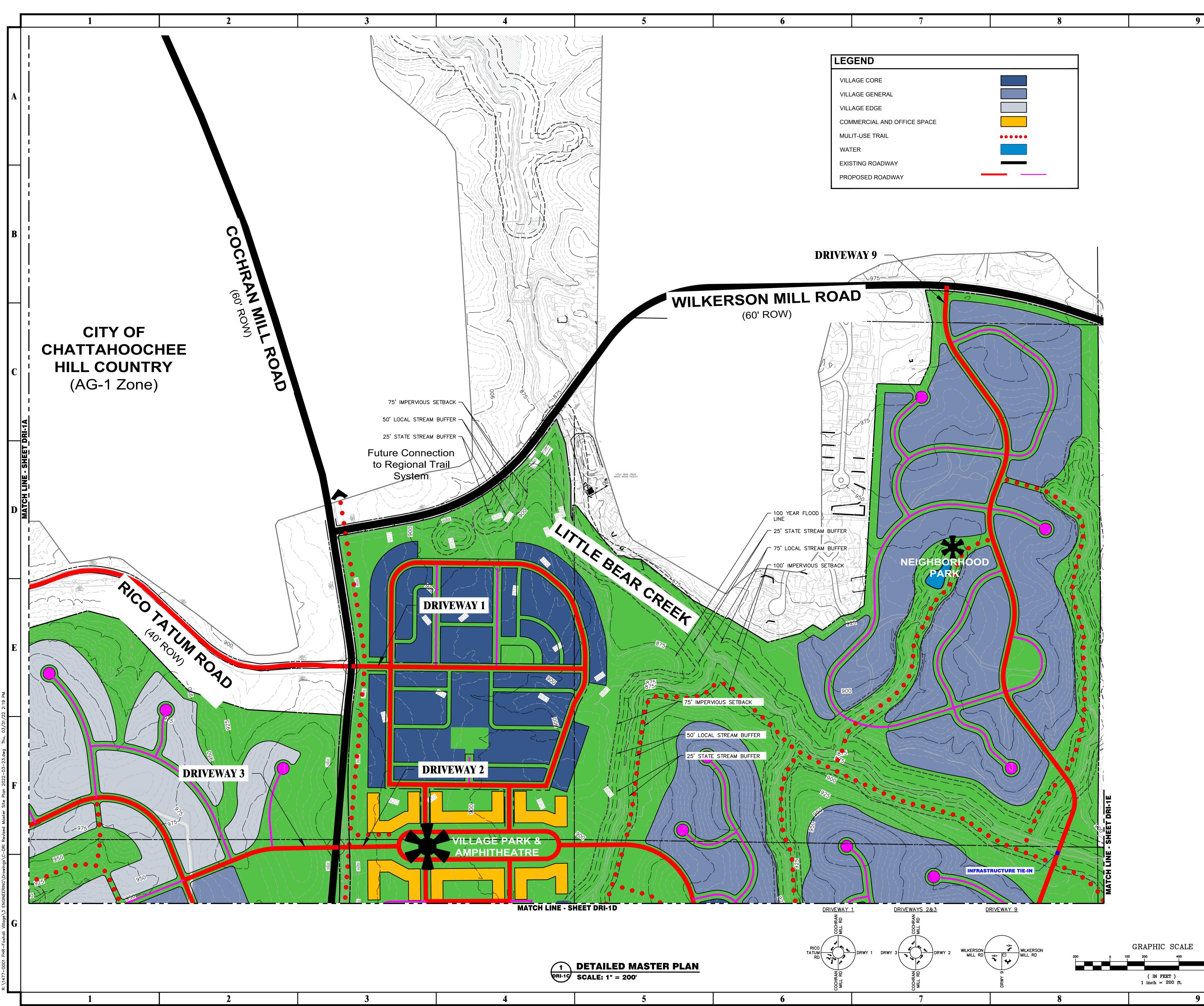


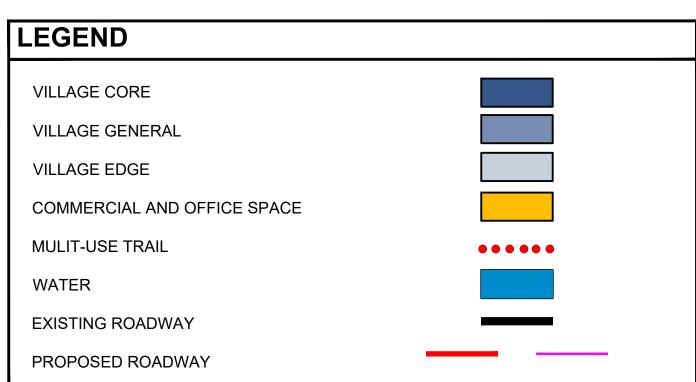


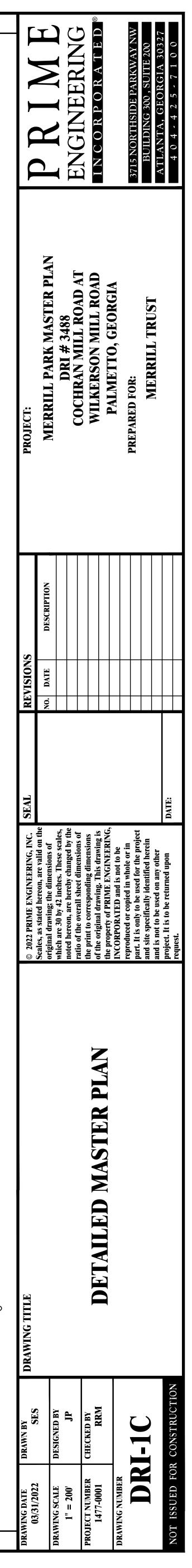


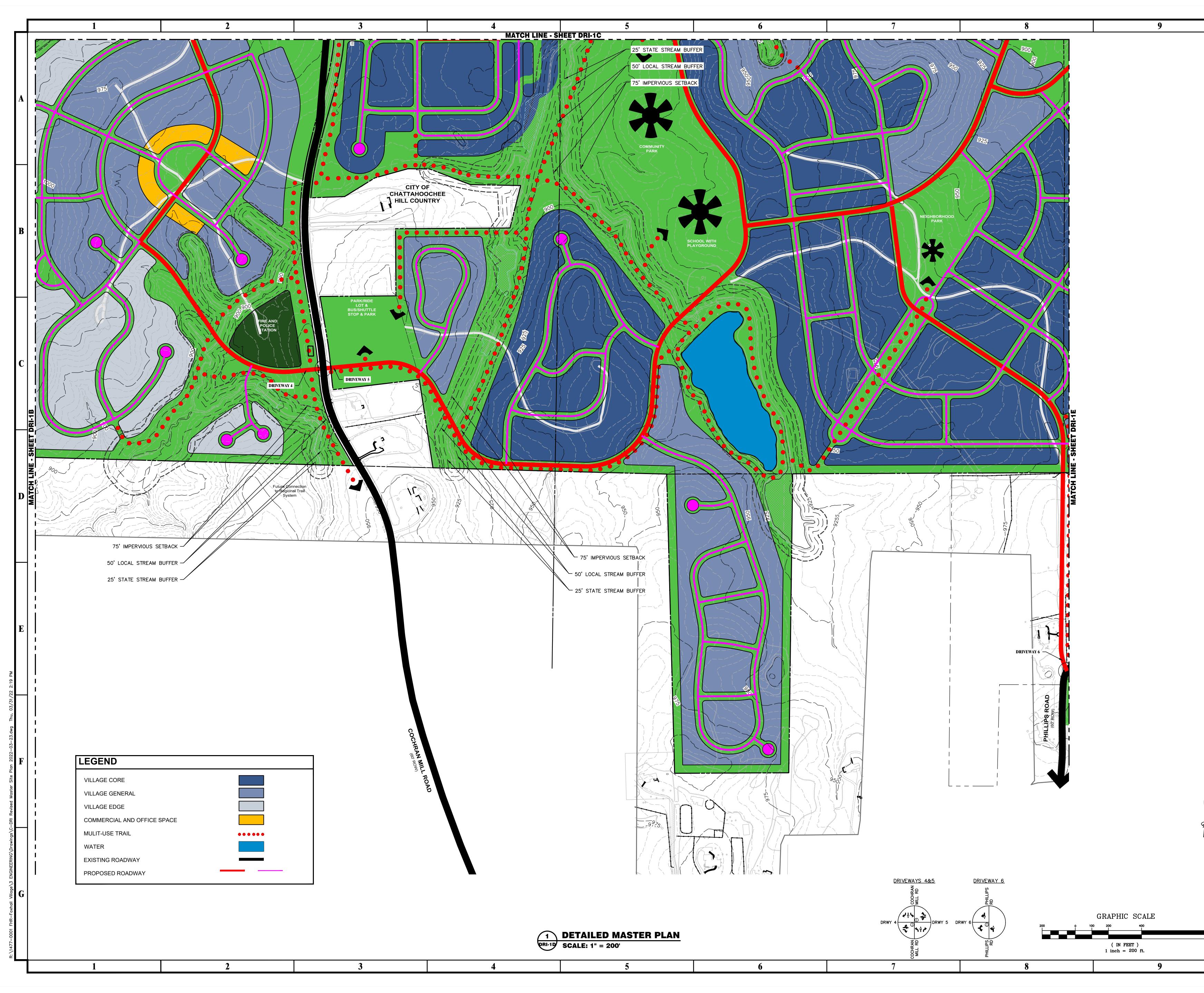


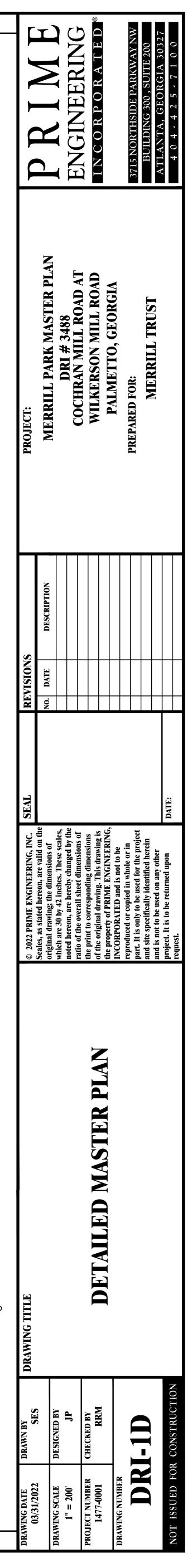






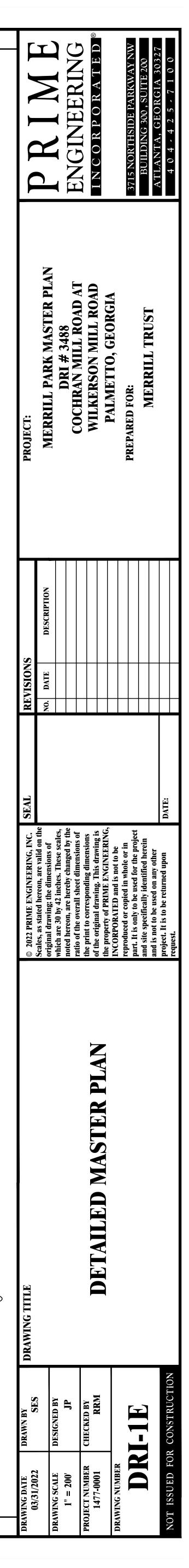


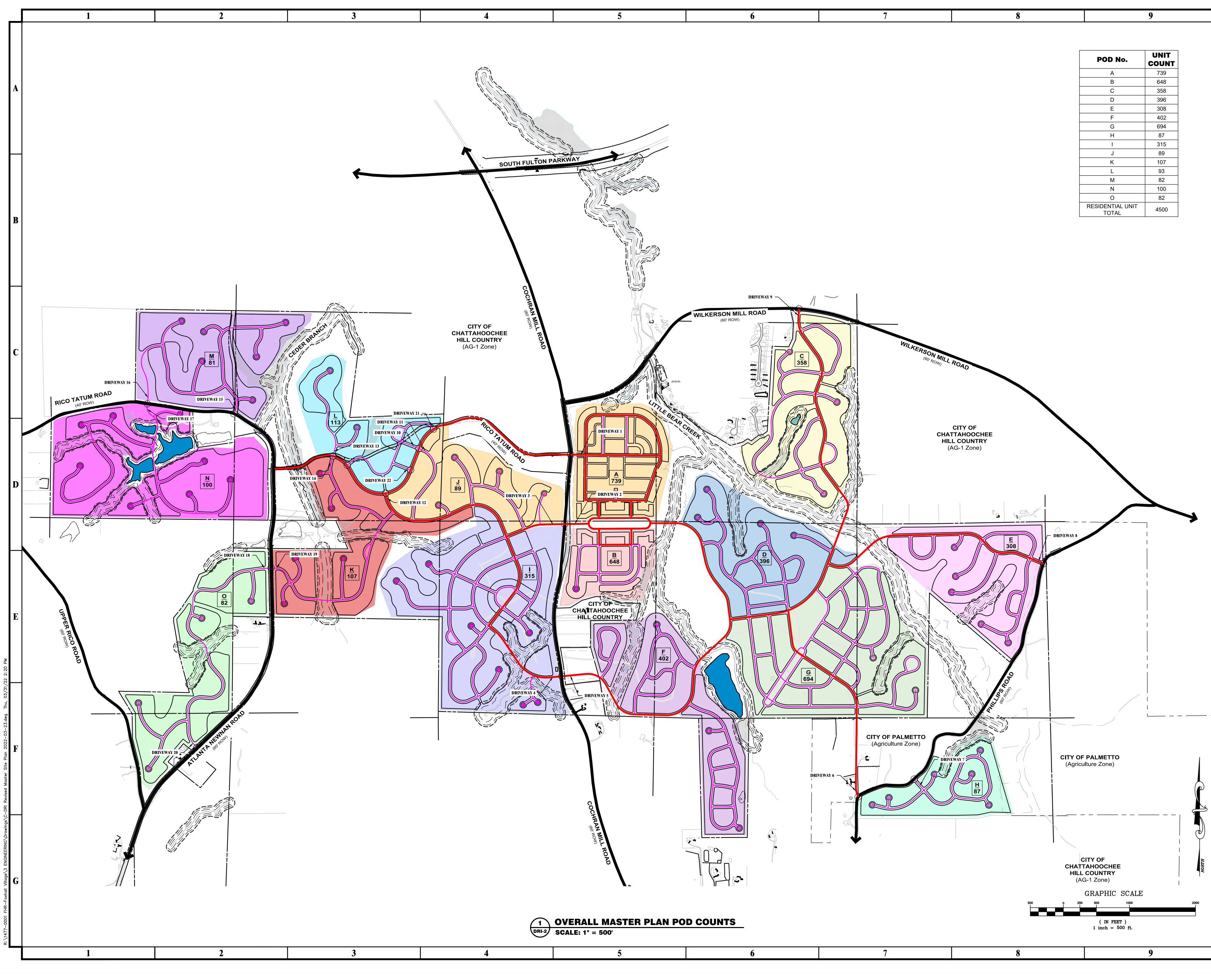






	7		8		9
KERSON MILL ROAD					
(00, ROW) ROAD					
EGEND					
VILLAGE CORE					
/ILLAGE GENERAL					
/ILLAGE EDGE					
COMMERCIAL AND OFFIC	E SPACE			1	
		••••			
IULIT-USE TRAIL			/		
			/		
AULIT-USE TRAIL WATER EXISTING ROADWAY					





7	8	9

POD No.	UNIT COUNT
А	739
В	648
С	358
D	396
Е	308
F	402
G	694
Н	87
I	315
J	89
К	107
L	93
М	82
Ν	100
0	82
RESIDENTIAL UNIT TOTAL	4500

