

REGIONAL REVIEW FINDING

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

DATE: July 4, 2022

TO: Mayor Rochelle Robinson, City of Douglasville

ATTN TO: Shayla Reed, Community Development Director, City of Douglasville FROM: Mike Alexander, Director, ARC Center for Livable Communities

RE: Development of Regional Impact (DRI) Review

ARC has completed a regional review of the below 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: Emblem Riverside Phase II DRI 3603 Submitting Local Government: City of Douglasville

Date Opened: June 14, 2022 Date Closed: July 4, 2022

<u>Description</u>: A DRI review of a proposal to construct 425 multi-family residential units on a 38 acre site off of Riverside Parkway in the City of Douglasville. The project was originally conceived as only the portion shown in Phase 1 which is already under construction. The addition of Phase II of the project put it over the threshold that then required DRI review.

Comments:

Key Comments

The project is partially aligned with applicable Developing Rural Areas policy recommendations set forth in the Atlanta Region's Plan which stress the need to protect these areas: "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 could be better aligned with Developing Rural Areas policies contained in the Atlanta Region's Plan by preserving more greenspace and implementing low-impact development approaches in the design of parking lots and other site elements.

The project is aligned with City of Douglasville goals and plans which envision residential development at this location.

Project elements appear to avoid intrusions into stream buffers which is strongly supportive of regional water quality and environmental protection policies.

The project includes a comprehensive internal sidewalk network connecting to proposed sidewalks and bike lanes on Riverside Parkway which is consistent with regional transportation goals and recommendations.

The project will generate a total of 2,294 new daily vehicular trips; several roadway modifications are proposed to mitigate the traffic impact.

A total of 795 parking spaces are proposed but no EV charging stations are included; provision of some EV charging stations would be consistent with regional efforts to develop EV infrastructure.

General Comments

The Atlanta Region's Plan, developed by ARC in close coordination with partner local governments, is intended to broadly guide regional development in the 12-county metro region to ensure that required infrastructure and resources are in place to support continued economic development and prosperity for the region. The Plan assigns a relevant growth management category designation to all areas in the region and provides corresponding growth policy recommendations for each category.

The Plan designates the site of this DRI as Developing Rural Areas. General information and policy recommendations for Developing Rural areas are provided at the end of these comments. The project was originally conceived as only the portion shown in Phase 1 which is already under construction. The addition of Phase II of the project put it over the threshold that then required a DRI review. These comments apply to both project phases with the understanding that Phase I is already underway.

Transportation and Mobility Comments

ARC's Transportation and Mobility Group comments are attached.

The project is projected to generate a total of 2,294 new vehicular trips; a number of roadway modifications are proposed to mitigate the traffic impact.

The project proposes a comprehensive internal sidewalk network connecting to proposed sidewalks and bike lanes on Riverside Parkway which is consistent with regional transportation goals and recommendations.

A total of 795 parking spaces are proposed but no EV charging stations are included; provision of some EV charging stations would be consistent with regional efforts to develop EV infrastructure.

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 Group Comments

ARC's Natural Resource Group comments are attached.

Both the USGS coverage for the project area and the project site plan show an unnamed blue-line stream in the Phase I portion of the property. The site plan shows and identifies both the 50-foot undisturbed stream buffer and additional 25-foot impervious setback required under the City's Stream Buffer Ordinance, as well as the State 25-foot State Erosion and Sedimentation Control buffer along the entire length of the stream on the property. No intrusions into the buffers are shown on the site plan. Any buffer intrusions that occur during construction may require variances from the appropriate agency. Any unmapped streams in either phase of the project may also be subject to the City buffer ordinance. Any other State waters identified on the property may also be subject to the State 25-foot Sediment and Erosion Control buffer.

Environmental Comments

Retention of additional natural wooded areas or greenspace wherever possible on the site would be in keeping with regional policies regarding water resource protection, 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 the large surface parking areas and site driveways, and as part of any improvements to site frontages.

The Atlanta Region's Plan Growth Policy Considerations: Developing Rural Areas

Developing Rural Areas category which are 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.

The project is partially aligned with the above Developing Rural Areas policy recommendations as documented in the Atlanta Region's Plan. The project could be more aligned with these recommendations by preserving additional wooded areas and utilizing low impact development approaches in the design of site elements.

City of Douglasville leadership and staff, along with the applicant team, should collaborate closely to ensure optimal sensitivity to the needs of nearby local governments, neighborhoods, and natural systems.

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

ATLANTA REGIONAL COMMISSION
GEORGIA DEPARTMENT OF TRANSPORTATION
GEORGIA ENVIRONMENTAL FINANCE AUTHORITY
FULTON COUNTY

GEORGIA DEPARTMENT OF NATURAL RESOURCE
GEORGIA REGIONAL TRANSPORTATION AUTHORITY
GEORGIA CONSERVANCY
CITY OF SOUTH FULTON

GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS
GEORGIA SOIL AND WATER CONSERVATION COMMISSION
CITY OF DOUGLASVILLE
COBB COUNTY

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





Developments of Regional Impact

DRI Home Tier Map **View Submissions Apply** <u>Login</u>

DRI #3603

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: Douglasville Individual completing form: R. Ryan Anderson

Telephone: 678-449-3202

E-mail: andersonr@douglasvillega.ogv

*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: Emblem Riverside, Phase II

Location (Street Address, GPS 1551 Riverside Parkway, Douglasville, GA 30122 Coordinates, or Legal Land Lot Description):

Is property owner different from

Is the proposed project entirely

located within your local government's jurisdiction?

developer/applicant?

Brief Description of Project: This is a Phase II of the Emblem Riverside multifamily project located in Douglasville, GA. The second phase will be made up of 105 apartment homes. The

phase I has 320 homes, bringing the combined total to 425 total apartment homes.

The apartments are Type V. wood-framed buildings.

		· ·
Development Type:		
(not selected)	Hotels	Wastewater Treatment Facilities
Office	Mixed Use	Petroleum Storage Facilities
Commercial	Airports	Water Supply Intakes/Reservoirs
Wholesale & Distribution	OAttractions & Recreational Facilities	Intermodal Terminals
Hospitals and Health Care Facilities	Post-Secondary Schools	Truck Stops
Housing	Waste Handling Facilities	Any other development types
Olndustrial	Quarries, Asphalt & Cement Plants	
If other development type, describe:		
Project Size (# of units, floor area, etc.):	5 apartment homes (This is phase li, the	phase i has 320 homes.)
Developer: LM	С	
Mailing Address: 628	35 Barfield Road	
Address 2:		
Cit	y:Atlanta State: GA Zip:30328	
Telephone: 404	4-453-0052	

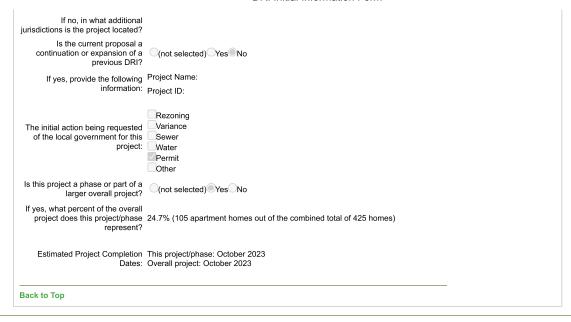
Email: taylor.harper@livelmc.com

(not selected) Yes No

(not selected) Yes No

If yes, property owner: The property is owned by a joint venture known as AG-LMC Riverside Property Owner, LLC. LMC is part

apps.dca.ga.gov/DRI/InitialForm.aspx?driid=3603



GRTA DRI Page | ARC DRI Page | RC Links | DCA DRI Page

DRI Site Map | Contact





Developments of Regional Impact

DRI Home	Tier Map	<u>Apply</u>	View Submissions	<u>Login</u>
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DRI #3603		
	PMENT OF REGIONAL IMPACT dditional DRI Information	
	ounty government to provide information needed by the RDC for its revi or the DRI Process and the DRI Tiers and Thresholds for more	iew of
Loc	al Government Information	
Submitting Local Government:	Douglasville	
Individual completing form:	Shayla Reed	
Telephone:	678-449-3028	
Email:	reeds@douglasvillega.ogv	
	Project Information	
Name of Proposed Project:	Emblem Riverside, Phase II	
DRI ID Number:	3603	
Developer/Applicant:	LMC	
Telephone:	404-453-0052	
Email(s):	taylor.harper@livelmc.com	
Addit	ional 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 ^⑤ 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 star	t until this additional information is provided.	
1	Economic Development	
Estimated Value at Build-Out:	\$21,352,452	
Estimated annual local tax revenues (i.e., property tax, sales tax) likely to be generated by the proposed development:	\$350,000/year (stabilized)	
s 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	
	320 multifamily apartment homes, set to deliver first homes in Sept- is 105 units (bringing the combined total to 425 homes). The total	//
	Water Supply	
Name of water supply provider for this site:	DDCWSA	
What is the estimated water supply	23,250	ī
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 expand the exis	ting water supply capacity:
la a water line outancies required to some	
Is a water line extension required to serve this project?	○(not selected)○Yes®No
If yes, how much additional line (in miles) w	viii be required?
	Wastewater Disposal
Name of wastewater treatment provider for	DDCWSA
this site: What is the estimated sewage flow to be	00.050
generated by the project, measured in Millions of Gallons Per Day (MGD)?	23,250
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? If yes, how much additional line (in miles) w	○(not selected)○Yes®No
il yes, now much additional line (in miles) w	III be required?
	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.)	286 enter ; 286 exit
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:	orn for the phase I of the project in Jan-2020. It is my understanding that
the DRI will outline the updated traffic stu	dy that is needed for the phase II.
	Solid Waste Disposal
How much solid waste is the project expected to generate annually (in tons)?	81.4 tons/year
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?	33% (Impervious area = 3.03 acres/131,986 sq ft)

Describe any measures proposed (such as buffers, detention or retention ponds, pervious parking areas) to mitigate the project's impacts on stormwater management: we have designed three stormwater management ponds on the site. We are completing our civil design now and will include pervious parking areas if the site layout requires them.		
	Environmental Quality	
Is the development located within, or likely t	o affect any of the following:	
Water supply watersheds?	○(not selected)○Yes®No	
2. Significant groundwater recharge areas?	O(not selected)OYes®No	
3. Wetlands?	O(not selected)OYes ® No	
4. Protected mountains?	O(not selected)OYes ® 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:	
Submit Application Save without Back to Top	ut Submitting Cancel	

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DRI Site Map | Contact



regional impact + local relevance

Development of Regional Impact

Assessment of Consistency with the Regional Transportation Plan

DRI INFORMATION

DRI Number #3603

DRI Title Emblem Riverside Phase II

County Douglas County

City (if applicable) Douglasville

Address / Location Northwest of Riverside Parkway and Summer Lake Road

Proposed Development Type: It is proposed to develop 280 midrise and 145 low rise multifamily homes.

Build Out: 2025

Review Process EXPEDITED

NON-EXPEDITED

REVIEW INFORMATION

Prepared by ARC Transportation Access and Mobility Division

Staff Lead Aries Little

Copied Marquitrice Mangham

Date June 21, 2022

TRAFFIC STUDY

Prepared by A&R Engineering Inc.

Date May 25, 2022

REGIONAL TRANSPORTATION PLAN PROJECTS

constraine	ffic analysis incorporate all projects contained in the current version of the fiscally d RTP which are within the study area or along major transportation corridors connecting area with adjacent jurisdictions?
	ovide the regional plan referenced and the page number of the traffic study where relevant s are identified)
Table 5 refe	rences a list of projects identified in the fiscally constrained RTP.
☐ NO (pr	ovide comments below)
Click here	to provide comments.
REGIONAL NETW	ORKS velopment site be directly served by any roadways identified as Regional Thoroughfares?
	· · · · · · · · · · · · · · · · · · ·
including places in application to maintal Regional access, the Atlanta recombined	al Thoroughfare is a major transportation corridor that serves multiple ways of traveling, walking, bicycling, driving, and riding transit. It connects people and goods to important metropolitan Atlanta. A Regional Thoroughfare's operations should be managed through on of special traffic control strategies and suitable land development guidelines in order ain travel efficiency, reliability, and safety for all users. In light of the special function that Thoroughfares serve in supporting cross-regional and interjurisdictional mobility and ne network receives priority consideration for infrastructure investment in the Metro egion. Any access points between the development and a Regional Thoroughfare, d with the development's on-site circulation patterns, must be designed with the goal of g the highest possible level of capacity and safety for all users of the roadway.
□ NO	
YES (id	entify the roadways and existing/proposed access points)
Riversid	cosed to have three access points to the development. Two are full-access and located on e Parkway; whereas the third driveway is located on Summer Lake Road and is an exit only. e Parkway bisects Regional Thoroughfare SR 6.

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.

ш	10	
\boxtimes	YES (identify the roadways and existing/proposed access poir	nts)

The project site's access points on Riverside Parkway are bounded by SR 92 and SR 6 which are identified as Regional Truck Routes.

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.

\boxtimes	NOT APPLICABLE (neares	st station more than one mile away)
	RAIL SERVICE WITHIN OF	NE MILE (provide additional information below)
	Operator / Rail Line	
	Nearest Station	Click here to enter name of operator and rail line
	Distance*	☐ Within or adjacent to the development site (0.10 mile or less)
		☐ 0.10 to 0.50 mile
		0.50 to 1.00 mile
	Walking Access*	Sidewalks and crosswalks provide sufficient connectivity
		Sidewalk and crosswalk network is incomplete

	 Not applicable (accessing the site by walking is not consistent with the type of development proposed)
	Click here to provide comments.
Bicycling Access*	Dedicated paths, lanes or cycle tracks provide sufficient connectivity
	Low volume and/or low speed streets provide connectivity
	☐ Route follows high volume and/or high speed streets
	Not applicable (accessing the site by bicycling is not consistent with the type of development proposed)
Transit Connectivity	Fixed route transit agency bus service available to rail station
	Private shuttle or circulator available to rail station
	No services available to rail station
	Not applicable (accessing the site by transit is not consistent with the type of development proposed)
	Click here to provide comments.

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

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

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

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

Click here to provide comments.

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

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

\boxtimes	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 di	irect feasible walking or bicycling route to the nearest point on the

development site

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

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 NO
YES
Connect Douglas provides fixed route bus service within the jurisdiction of the development site.

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.

\boxtimes	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		

	 Following the most direct feasible walking or bicycling route to the nearest point on the development site
OTHER T	RANSPORTATION DESIGN CONSIDERATIONS
	oes the site plan provide for the construction of publicly accessible local road or drive aisle onnections 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)
	oes the site plan enable pedestrians and bicyclists to move between destinations within the evelopment site safely and conveniently?
	The ability for walkers and bicyclists to move within the site safely and conveniently reduces reliance on vehicular trips, which has congestion reduction and health benefits. Development site plans should incorporate well designed and direct sidewalk connections between all key destinations. To the extent practical, bicycle lanes or multiuse paths are encouraged for large acreage sites and where high volumes of bicyclists and pedestrians are possible.
	YES (sidewalks provided on all key walking routes and both sides of roads whenever practical and bicyclists should have no major issues navigating the street network)
	PARTIAL (some walking and bicycling facilities are provided, but connections are not comprehensive and/or direct)
	NO (walking and bicycling facilities within the site are limited or nonexistent)
	NOT APPLICABLE (the nature of the development does not lend itself to internal walking and bicycling trips)
	OTHER (Please explain)

11. Does the site plan provide the ability to construct publicly accessible bicycling and walking

connections with adjacent parcels which may be redeveloped in the future?

Not applicable (accessing the site by bicycling is not consistent with

the type of development proposed

re op	ne ability for walkers and bicyclists to move between developments safely and conveniently duces reliance on vehicular trips, which has congestion reduction and health benefits. Such apportunities should be considered and proactively incorporated into development site plans thenever 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)
fror	es the site plan effectively manage truck movements and separate them, to the extent possible, in the flow of pedestrians, bicyclists and motorists both within the site and on the surrounding id network? The ability for delivery and service vehicles to efficiently enter and exit major developments is
ar se	ten key to their economic success. So is the ability of visitors and customers being able to move ound safely and pleasantly within the site. To the extent practical, truck movements should be gregated by minimizing the number of conflict points with publicly accessible internal roadways, dewalks, 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)
RECOMME	INDATIONS
	the transportation network recommendations outlined in the traffic study appear to be feasible n 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

EMBLEM RIVERSIDE DRI

City of Douglasville Natural Resources Group Review Comments June 15, 2022

Chattahoochee River Corridor

A portion of the project property is within the 2000-foot Chattahoochee River Corridor, which is authorized under the Metropolitan River Protection Act (OCGA 12-5-440 et seq.). However, this property was part of the project called New Manchester at the time the Act took effect in this area in 1998, and was part of the portion of the development that was exempted in 1999 from the requirements of the Metropolitan River Protection Act and the Chattahoochee River Corridor under OCGA 12-5-451(5). ARC staff has determined that the proposal still meets the requirements of the 1999 exemption and is not subject to review under the Act.

Other Regulations

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 entire property is in both the Sweetwater Creek and the Chattahoochee River watersheds. The property is not in the water supply watershed portion of Sweetwater Creek. While the property is located downstream of the existing public water supply intakes on the Chattahoochee, it is in an area that may become a water supply watershed in the future. South Fulton and Coweta County have both proposed water supply intakes on the river. Development of either of these intakes would make this portion of the Chattahoochee basin part of a large water supply watershed (over 100 square miles), as defined under the Part 5 Criteria of the 1989 Georgia Planning Act. However, the only applicable Part 5 requirements for large water supply watersheds without a water supply reservoir 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.

Stream Buffers

Both the USGS coverage for the project area and the project site plan show an unnamed blue-line stream in the Phase I portion of the property. The site plan shows and identifies both the 50-foot undisturbed stream buffer and additional 25-foot impervious setback required under the City's Stream Buffer Ordinance, as well as the State 25-foot State Erosion and Sedimentation Control buffer along the entire length of the stream on the property. No intrusions into the buffers are shown on the site plan. Any buffer intrusions that occur during construction may require variances from the appropriate agency. Any unmapped streams in either phase of the project may also be subject to the City buffer ordinance. Any other State waters identified on the property may also be subject to the State 25-foot Sediment and Erosion Control buffer.

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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.

