

DATE: June 14, 2022

TO: Mayor Andre Dickens, City of Atlanta
ATTN TO: Monique Forte, Planner III, City of Atlanta
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: Moreland and Custer DRI 3586

Submitting Local Government: City of Atlanta

Date Opened: May 19, 2022

Date Closed: June 14, 2022

Description: A DRI review of a proposal to construct 260 townhomes, 413 multi-family residential units, and 19,500 SF of retail space on a roughly 32 acre site at the SE corner of Moreland Avenue and Custer Avenue in southeast Atlanta. The project site, currently developed as a large strip mall with an extensive surface parking area, was a key focus of the 2008 South Moreland Avenue Livable Centers Initiative Study.

Comments:

Key Comments

The project is generally well aligned with applicable Maturing Neighborhoods growth policy recommendations set forth in the Atlanta Region's Plan which note: "The demand for infill development, redevelopment, and adaptive reuse of existing buildings in this area needs to be balanced with the preservation of existing single-family neighborhoods, as well as the need for additional usable parks and greenspace close to residents, including amenities such as trails and sidewalks."

The inclusion of a segment of the South River Trail along the Custer Avenue frontage, which will eventually link to the Beltline, the South River Forest, and other regional trail destinations, is strongly supportive of regional transportation and recreation policies.

The project will remove a large area of surface parking directly adjacent to Intrenchment Creek thereby reducing run-off into the Creek and will also stabilize a section of the creek embankment; these actions are

strongly supportive of regional water-quality and environmental goals.

The project is projected to generate 4,204 daily new vehicular trips; the presence of five nearby bus stops which service three MARTA bus routes and the incorporation of South River Trail segment offer significant multi-modal options which are supportive of regional transportation policies.

The project site was identified in the joint City of Atlanta/ARC 2008 South Moreland Avenue Livable Centers Initiative Study as one of three main redevelopment nodes for the whole Moreland corridor. The current proposal incorporates several Study elements but does not achieve the overall goal of creating a mixed-use walkable neighborhood organized around a strong internal street grid with appealing urban design and placemaking components. Some relatively minor design adjustments could greatly increase the project's alignment with the LCI Study goals.

Several project elements including the one-story stand-alone retail at the corner of Moreland and Custer, proposed Moreland Avenue deceleration lane, and multiple driveways along Custer Avenue are directly contradictory to key LCI Study goals and will not contribute to changing the high-speed auto-centric character of the corridor.

Additional measures to ensure a safe and convenient pedestrian route across Moreland Avenue to provide residents easy access to the everyday grocery, pharmacy, banking and other destinations would greatly enhance the project's walkability.

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 Maturing Neighborhoods. The Plan provides general information and policy recommendations for Maturing Neighborhoods locations as described at the end of these comments.

This site was included as a key redevelopment project in the 2008 South Moreland Livable Centers Initiative (LCI) study. The LCI study envisioned a new walkable mixed-use neighborhood with a range of commercial uses and a mix of housing types with additional elements including: a trail along Intrenchment Creek; small-scale streets and blocks with connections to adjacent parcels to the south; a parkway style road along Intrenchment Creek; common green space elements that organize the neighborhood; and substantially higher mixed-use density at the Moreland and Custer intersection for placemaking purposes.

The current plan advances a number of these elements including two housing types, a trail along the Creek, the provision of several greenspace areas, and the accommodation of future roadway connections at the southern stub-outs shown for two of the north-south streets proposed. However, the plan falls well short of providing other key goals and components of the LCI study, particularly those related to placemaking and mixed-use.

The proposed project is more of a stand-alone development than the multi-faceted new neighborhood that was envisioned. The housing mix, while limited to townhomes and multi-family, is sufficient but the single

commercial location, a one-story stand-alone building with surface parking, is far short of the small-scale neighborhood accessory commercial uses contemplated in the LCI. Residents of the project won't be able to walk to a range of uses like dry cleaning, corner stores, small restaurants and the like.

The street grid misses the key opportunity to create principal north-south and east-west axes for both connectivity and placemaking purposes. A central east-west axis from the entrance on Moreland and terminating with an overlook at the Creek and possibly flanked by small pocket parks would help establish a much stronger sense of place and provide better connectivity.

The two proposed small green spaces on the eastern edge are positive design elements but there is unmet need for green space closer or adjacent to the multi-family buildings and as a potential placemaking element off of Custer or Moreland.

The proposed one-story retail building at the corner of Moreland and Custer will service users outside of the site but is unlikely to be a walking destination for project residents. The LCI contemplated a much taller mixed use building to establish an urban presence at this key corner; a one-story building will not accomplish this or be differentiated from the prevailing existing one-story retail strip condition along Moreland.

A central goal of the LCI Study was to move beyond Moreland's dominant auto-oriented development pattern, especially at key nodes, which is not supportive of walkability and pedestrian safety goals. Ideally this key corner location would host at a minimum another three-story multi-family building with ground floor retail that would extend along Moreland to the driveway entrance. In summary, some plan refinements would be needed to make the proposed consistent with the core goals and vision of the LCI study.

Transportation and Mobility Comments

ARC's Transportation and Mobility Group comments are attached.

The project is expected to generate a gross total of 4,666 daily new trips which will be reduced to 4,204 trips given pass-by, alternative mode, and mixed-use reductions. The presence of five nearby bus stops which service three MARTA bus routes and the incorporation of a segment of the regional South River Trail along the project's northern frontage offer multi-modal options which are supportive of regional transportation policies. The internal sidewalk system is comprehensive and aligned with walkability goals; ideally the proposed trail within the site along Intrenchment Creek could have a more winding layout and be made of pervious material.

The proposed plan appears to show stub-outs at the southern ends of the north-south roads on the east and west sides of the site which will provide future connectivity to the parcels to the south when they are eventually redeveloped. A deceleration lane proposed for driveway A on Moreland Avenue would diminish the pedestrian experience and safety and is not in keeping with the walkability vision for the site.

The three site driveways proposed for the Custer Avenue frontage conflict with the goal of providing a safe enhanced pedestrian route in the form of the South River Trail segment included in the design; a reduction to two driveways would significantly limit this conflict.

A total of 1,197 surface parking spaces are proposed. No EV charging or bicycle parking spaces appear to be proposed; inclusion of optimal numbers of both would be supportive of regional EV infrastructure development and multi-modal transportation 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. Sidewalk crossings at driveways should maintain a constant elevation with the slope accommodated by the driveway ramp, rather than the whole sidewalk crossing being lowered as part of the curb cut, to clearly demarcate a safe pedestrian route.

ARC Natural Resource Group Comments

ARC Natural Resource Group full comments are attached. Both the USGS coverage for the project area and the submitted site plan show Intrinchment Creek running north to south through the easternmost end of the property. The site plan shows a 50-foot undisturbed buffer and a 75-foot impervious buffer which conform to the City of Atlanta Stream Buffer Ordinance, as well as the State 25-foot State Erosion and Sedimentation Control Buffer on the west side of the stream. While the project property line is within the buffers for most of the eastern side of Intrinchment Creek, the buffers should be noted on that side of the stream, even if applying their full widths is not possible on the property.

Also, an 8-foot-wide trail, identified as the proposed Intrinchment Creek Trail, is shown between the proposed development and the buffers. In two places, it appears to be at the edge of the 75-foot City buffer. Any intrusion into that buffer may require a variance from the City. Any unmapped streams on the property may be subject to buffers required under the City of Atlanta Stream Buffer Ordinance. Any waters of the state on the property will be subject to the State 25-foot Erosion and Sedimentation Control Buffer.

Other Environmental Comments

The project proposes to remove existing intrusions into protected stream buffers for Intrinchment Creek and does not propose any new intrusions both of which actions are highly aligned with regional environmental and water quality goals.

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.

City of Atlanta Walkability and Pedestrian Safety Comments

Comments were received from the City of Atlanta. They focused on the need for special attention to pedestrian safety along and across the Moreland Avenue project frontage. A safe pedestrian crossing, utilizing a pedestrian hybrid beacon, is needed near the southern limits of the site to provide a more direct pedestrian route from the multi-family units to the most likely nearby pedestrian destinations including the grocery store, pharmacy, and bank on the west side of Moreland. Ideally the topographic issue at the southern edge of the site could be addressed to allow for the driveway to be shifted there to align with the main driveway on the west side of the street which would also possibly allow for a traffic signal.

The Atlanta Region's Plan: Maturing Neighborhoods

According to the Atlanta Region's Plan, Maturing Neighborhoods are characterized by older neighborhoods that include both single- and multi-family development, as well as commercial and office uses at connected key locations. This area was mostly built out before 1980. These areas represent the largest part of the region that is facing infill and redevelopment pressures. In many cases, infrastructure is in place to handle additional growth, but in some areas, infrastructure is built out with limited capacity for expansion. This may constrain the amount of additional growth possible in certain areas. Many arterial streets in this area are congested due to their use as regional routes for commuters. Limited premium transit service is available in these areas.

The demand for infill development, redevelopment, and adaptive reuse of existing buildings in this area needs to be balanced with the preservation of existing single-family neighborhoods, as well as the need for additional usable parks and greenspace close to residents, including amenities such as trails and sidewalks. The intensity and land use of this project generally align with the Atlanta Region's Plan's recommendations for the Maturing Neighborhoods. The project utilizes previously developed land for new higher-density residential and commercial uses in a manner that can relieve development pressure on nearby single-family neighborhoods. Related sidewalk and South Fork Trail improvements will facilitate walkability.

However, a number of key elements related to mixed-use standards, building massing and placement, and layout of green spaces and streets fall well short of the vision established in the relevant LCI study; suggested design modifications could substantially further advance the achievement of the goals of the study. City of Atlanta 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 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	DEKALB COUNTY
MARTA	CITY OF ATLANTA	

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 located at



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DRI #3586

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: Atlanta

Individual completing form: Monique Forte

Telephone: 470-279-1545

E-mail: mbforte@atlantaga.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: Moreland and Custer

Location (Street Address, GPS Coordinates, or Legal Land Lot Description): 1296 Moreland Avenue SE, Atlanta, GA

Brief Description of Project: A mixed-use residential development with 681 residential units and 12,000 sf of retail. The focus on this development will be the proposed residential portion.

Development Type:

- | | | |
|--|---|---|
| <input type="radio"/> (not selected) | <input type="radio"/> Hotels | <input type="radio"/> Wastewater Treatment Facilities |
| <input type="radio"/> Office | <input checked="" type="radio"/> Mixed Use | <input type="radio"/> Petroleum Storage Facilities |
| <input type="radio"/> Commercial | <input type="radio"/> Airports | <input type="radio"/> Water Supply Intakes/Reservoirs |
| <input type="radio"/> Wholesale & Distribution | <input type="radio"/> Attractions & Recreational Facilities | <input type="radio"/> Intermodal Terminals |
| <input type="radio"/> Hospitals and Health Care Facilities | <input type="radio"/> Post-Secondary Schools | <input type="radio"/> Truck Stops |
| <input type="radio"/> Housing | <input type="radio"/> Waste Handling Facilities | <input type="radio"/> Any other development types |
| <input type="radio"/> Industrial | <input type="radio"/> Quarries, Asphalt & Cement Plants | |

If other development type, describe:

Project Size (# of units, floor area, etc.): 681 residential units and 12,000 sf of retail space

Developer: EAH Acquisitions, LP

Mailing Address: 5775 Glenridge Drive

Address 2: Building D, Suite 350

City: Atlanta State: GA Zip: 30328

Telephone: 770-541-5250

Email: knorton@empirecommunities.com

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

If yes, property owner: SRPF A/Moreland, LLC

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 SAP submittal

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: 2024

Dates: Overall project: 2024

[Back to Top](#)



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DRI #3586

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: Atlanta
Individual completing form: Monique Forte
Telephone: 470-279-1545
Email: mbforte@atlantaga.gov

Project Information

Name of Proposed Project: Moreland and Custer
DRI ID Number: 3586
Developer/Applicant: EAH Acquisitions, LP
Telephone: 770-541-5250
Email(s): knorton@empirecommunities.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: 228,000,000

Estimated annual local tax revenues (i.e., property tax, sales tax) likely to be generated by the proposed development: 3,900,000

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: City of Atlanta - Watershed Management

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

0.1289

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:

City of Atlanta Watershed Management

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

0.16347

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?

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.)

24-hour 2-way trips: 4,204 trips; AM Peak Hour: 89 entering and 216 exiting; PM Peak Hour: 206 entering and 156 exiting

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: See detailed traffic study for a summary of recommendations.

Solid Waste Disposal

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

588

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?

65.1 %

Describe any measures proposed (such as buffers, detention or retention ponds, pervious parking areas) to mitigate the project's impacts on stormwater management: We will be providing underground detention basins that utilizes infiltration.

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:

[Back to Top](#)

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

DRI INFORMATION

DRI Number #3586
DRI Title Moreland and Custer
County DeKalb County
City (if applicable) City of Atlanta
Address / Location Southeast corner of the intersection of SR 42/US 23 (Moreland Avenue) and Custer Avenue

Proposed Development Type: It is proposed to develop 413 apartment units, 260 townhome units, and 19,500 sf of retail space.

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 May 18, 2022

TRAFFIC STUDY

Prepared by A&R Engineering Inc.
Date May 2, 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*)

[Click here to provide comments.](#)

☒ NO (*provide comments below*)

[There are no projects identified in the fiscally constrained RTP within the study area.](#)

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 four proposed driveways which one is located on SR 42/US 23/Moreland Ave and the other three are located on Custer Avenue. SR 42/US 23/Moreland Ave is identified as a Regional Thoroughfare and each driveway is directly served by or easily accessed via Custer Avenue.](#)

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*)

SR 42/US 23/Moreland Ave is identified as a Regional Truck Route and each driveway is directly served by or easily accessed via Custer Avenue.

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

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

☒ NOT APPLICABLE (*nearest station more than one mile away*)

☐ RAIL SERVICE WITHIN ONE MILE (*provide additional information below*)

Operator / Rail Line

Nearest Station

[Click here to enter name of operator and rail line](#)

Distance*

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

☐ 0.10 to 0.50 mile

☐ 0.50 to 1.00 mile

Walking Access*

☐ Sidewalks and crosswalks provide sufficient connectivity

☐ Sidewalk and crosswalk network is incomplete

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

[Click here to provide comments.](#)

Bicycling Access*

- ☐ Dedicated paths, lanes or cycle tracks provide sufficient connectivity
- ☐ Low volume and/or low speed streets provide connectivity
- ☐ Route follows high volume and/or high speed streets
- ☐ Not applicable (*accessing the site by bicycling is not consistent with the type of development proposed*)

Transit Connectivity

- ☐ Fixed route transit agency bus service available to rail station
- ☐ Private shuttle or circulator available to rail station
- ☐ No services available to rail station
- ☐ Not applicable (*accessing the site by transit is not consistent with the type of development proposed*)

[Click here to provide comments.](#)

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

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

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

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

[Click here to provide comments.](#)

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

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

☐ NOT APPLICABLE (nearest bus, shuttle or circulator stop more than one mile away)

☒ SERVICE WITHIN ONE MILE (provide additional information below)

Operator(s) MARTA

Bus Route(s) Route 4, Route 9, and Route 832

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)

There are sidewalks on the east and west side of Moreland Avenue; however, the east side there seems to be a portion of the sidewalk overgrown with vegetation. On Cluster Avenue, sidewalks are only on the southside of the road.

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 provides fixed route and rail service within the jurisdiction of the study area.

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

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

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

☐ YES (provide additional information below)

Name of facility

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

Distance

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

☐ 0.15 to 0.50 mile

☐ 0.50 to 1.00 mile

Walking Access*

☐ Sidewalks and crosswalks provide connectivity

☐ Sidewalk and crosswalk network is incomplete

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

Bicycling Access*

☐ Dedicated lanes or cycle tracks provide connectivity

☐ Low volume and/or low speed streets provide connectivity

- ☐ Route uses high volume and/or high speed streets
- ☐ Not applicable (*accessing the site by bicycling is not consistent with the type of development proposed*)

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

OTHER TRANSPORTATION DESIGN CONSIDERATIONS

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

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

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

[Click here to provide comments.](#)

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

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

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

11. Does the site plan provide the ability to construct publicly accessible bicycling and walking connections with adjacent parcels which may be redeveloped in the future?

The ability for walkers and bicyclists to move between developments safely and conveniently reduces reliance on vehicular trips, which has congestion reduction and health benefits. Such opportunities should be considered and proactively incorporated into development site plans whenever possible.

- ☐ YES (connections to adjacent parcels are planned as part of the development)
- ☒ YES (stub outs will make future connections possible when adjacent parcels redevelop)
- ☐ NO (the development site plan does not enable walking or bicycling to/from adjacent parcels)
- ☐ NO (the site plan precludes future connections with adjacent parcels when they redevelop)
- ☐ NOT APPLICABLE (adjacent parcels are not likely to develop or redevelop in the near future)
- ☐ NOT APPLICABLE (the nature of the development or adjacent parcels does not lend itself to interparcel walking and bicycling trips)

There are proposed sidewalks along the frontage of the property. On the southside of Cluster Avenue, it is proposed to provide sidewalks that will connect to a future path/trail.

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):

MORELAND AND CUSTER DRI
City of Atlanta
Natural Resources Group Comments
May 20, 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.

Water Supply Watersheds

The proposed project is located in the Intrinchment Creek watershed, which is part of the South River Watershed. The South River is not a water supply watershed in the Atlanta Region and no Part 5 Environmental Minimum Planning Criteria for water supply watersheds apply.

Stream Buffers

Both the USGS coverage for the project area and the submitted site plan show Intrinchment Creek running north to south through the easternmost end of the property. The site plan shows a 50-foot undisturbed buffer and a 75-foot impervious buffer which conform to the City of Atlanta Stream Buffer Ordinance, as well as the State 25-foot State Erosion and Sedimentation Control Buffer on the west side of the stream. While the project property line is within the buffers for most of the eastern side of Intrinchment Creek, the buffers should be noted on that side of the stream, even if applying their full widths is not possible on the property. Also, an 8-foot wide trail, identified as the proposed Intrinchment Creek Trail, is shown between the proposed development and the buffers. In two places, it appears to be at the edge of the 75-foot City buffer. Any intrusion into that buffer may require a variance from the City. Any unmapped streams on the property may be subject to buffers required under the City of Atlanta Stream Buffer Ordinance. Any waters of the state on the property will be subject to the State 25-foot Erosion and Sedimentation Control Buffer.

Stormwater and 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.

Donald Shockey

From: Tyger, Curtis M <cmttyger@AtlantaGa.Gov>
Sent: Tuesday, June 14, 2022 3:59 PM
To: Forte, Monique B.; Donald Shockey
Cc: Smoot-Madison, Betty; Tai, Mark A.; Kedir, Nursef
Subject: RE: Moreland and Custer

Hey Donald,

Yes, ATLDOT's comment would be that the site should provide a safe pedestrian crossing of Moreland Ave near the southern limits of the site, to connect the multi-family residential units to a convenient route to the grocery store, pharmacy, bank, and other retail across Moreland Ave to the west. A pedestrian hybrid beacon would be appropriate. A traffic signal would also be appropriate if the site driveway is shifted south to align with the driveway on the opposite side.

Thanks.

Curtis Tyger

Urban Planner 3

City of Atlanta | Department of Transportation
55 Trinity Avenue SW, Suite 4350, Atlanta, GA 30303
+1 (404) 354-1285 | cmttyger@atlantaga.gov

#KemberliStrong



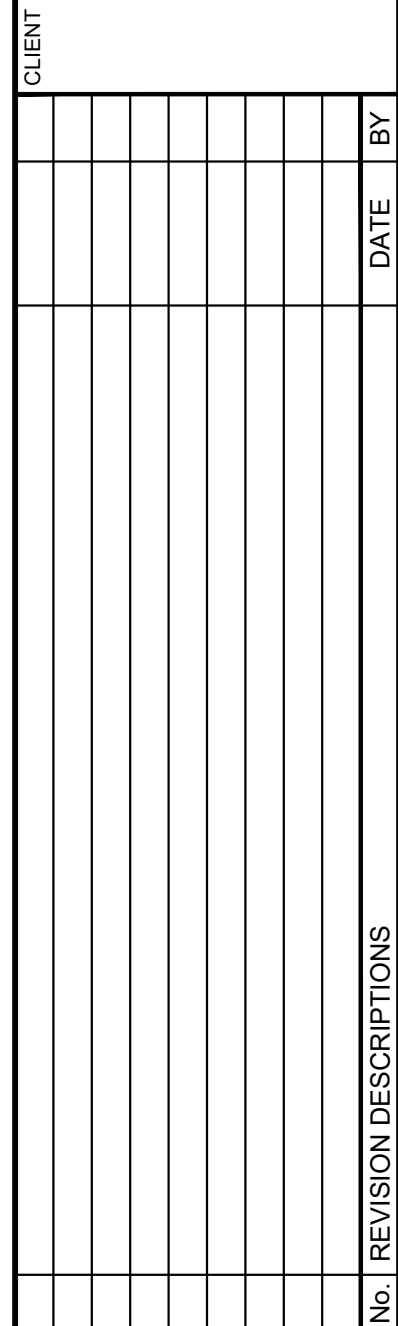
Safety is our business!



From: Forte, Monique B. <MBForte@AtlantaGa.Gov>
Sent: Tuesday, June 14, 2022 3:57 PM
To: Donald Shockey <DShockey@atlantaregional.org>
Cc: Smoot-Madison, Betty <bsmoot-madison@AtlantaGa.Gov>; Tyger, Curtis M <cmttyger@AtlantaGa.Gov>; Tai, Mark A. <MATai@AtlantaGa.Gov>; Kedir, Nursef <nkedir@AtlantaGa.Gov>
Subject: RE: Moreland and Custer

Donald,

Thanks for getting this to me. I would add emphasis to the creating a safe environment for the pedestrians on Moreland Avenue. ATL DOT, do you have any other comments to add?

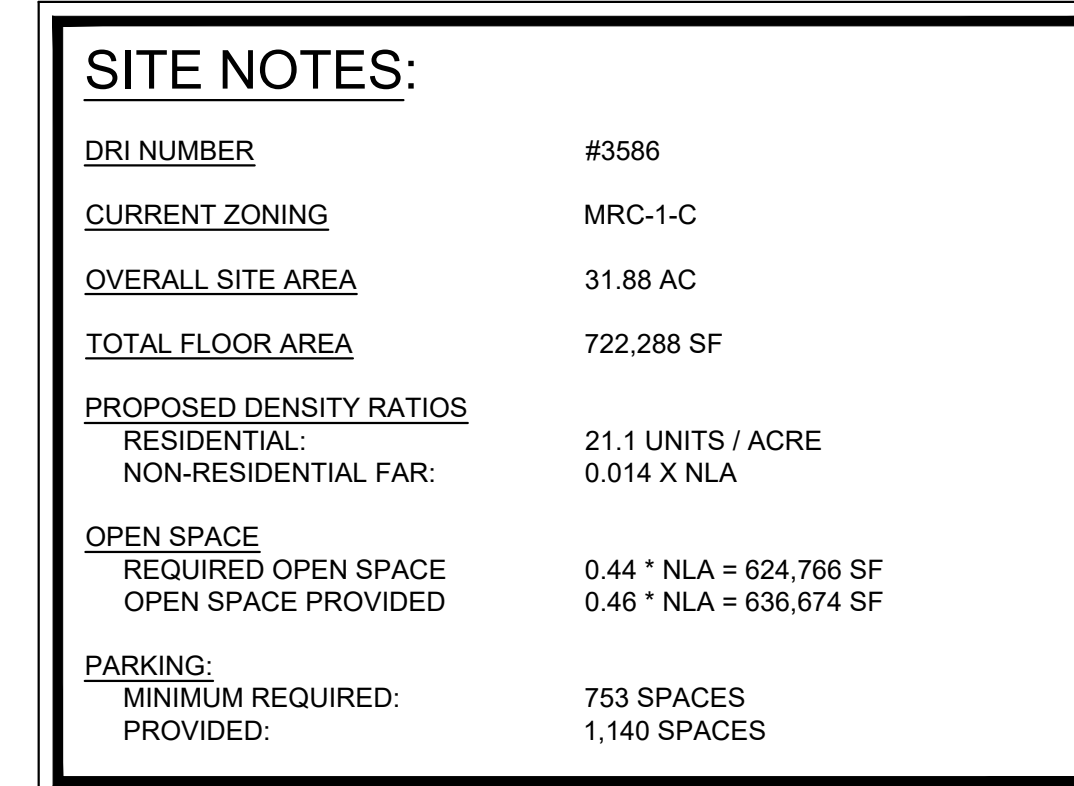


MORELAND & CUSTER
1296 MORELAND AVENUE SE, ATLANTA, GA 30316
LAND LOT 113, 15TH DISTRICT

Kimley»»Horn
© 2021 KIMLEY-HORN AND ASSOCIATES, INC.
817 W. PEACHTREE STREET, NW
THE BILTMORE, SUITE 601
ATLANTA, GEORGIA 30308
PHONE (404) 419-8700
WWW.KIMLEY-HORN.COM

EAH ACQUISITIONS, LP
5 GLENRIDGE DR, BUILDING D, SUITE 350, ATLANTA, GA 30305
PHONE: 770.541.6910

GSWCC CERT. (LEVEL II)	0000062135
DRAWN BY	HED
DESIGNED BY	MCP
REVIEWED BY	BWS
DATE	04/21/2022
PROJECT NO.	015002008
TITLE	
DRI SITE PLAN	
SHEET NUMBER	
C0-20	

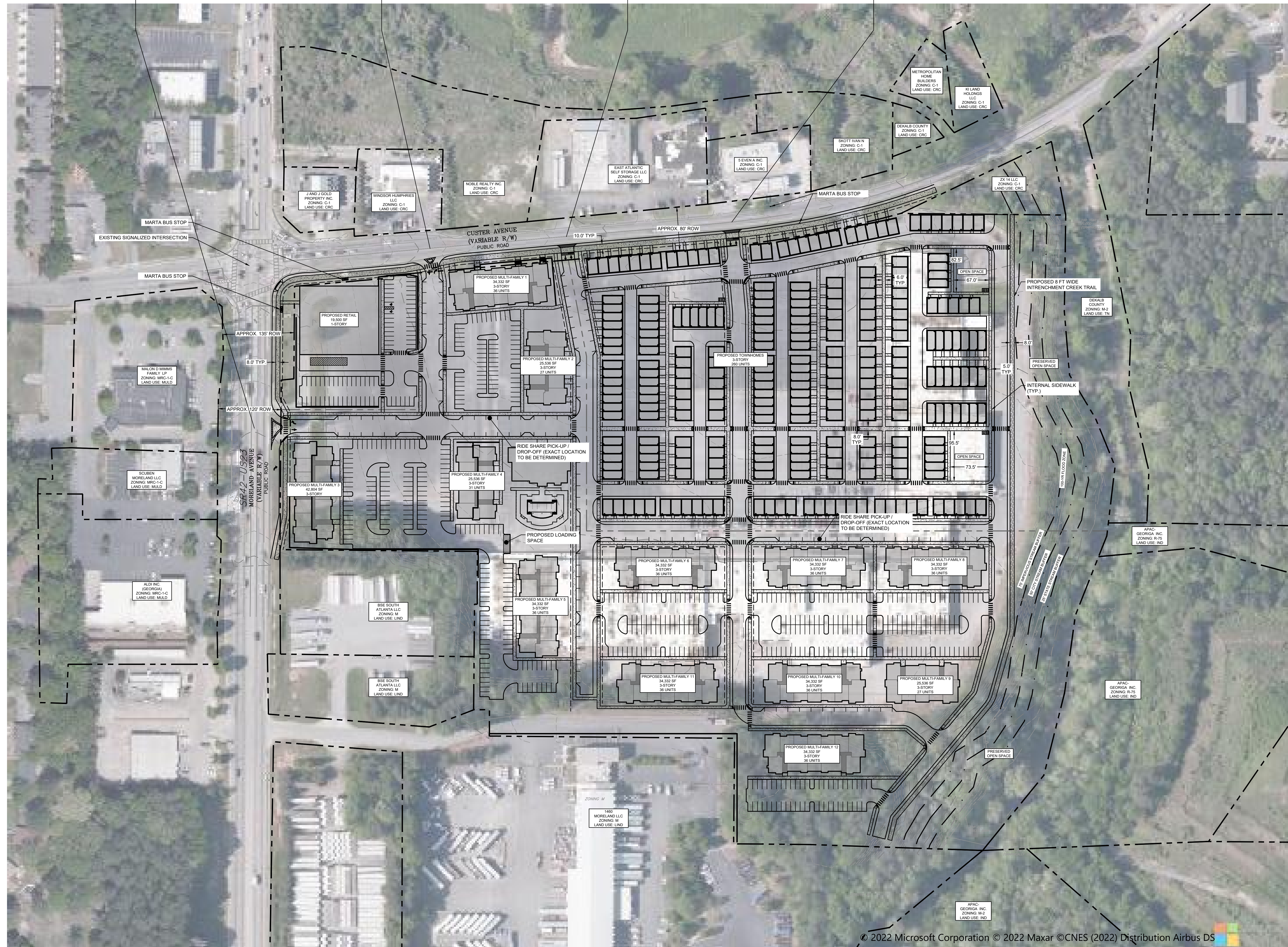
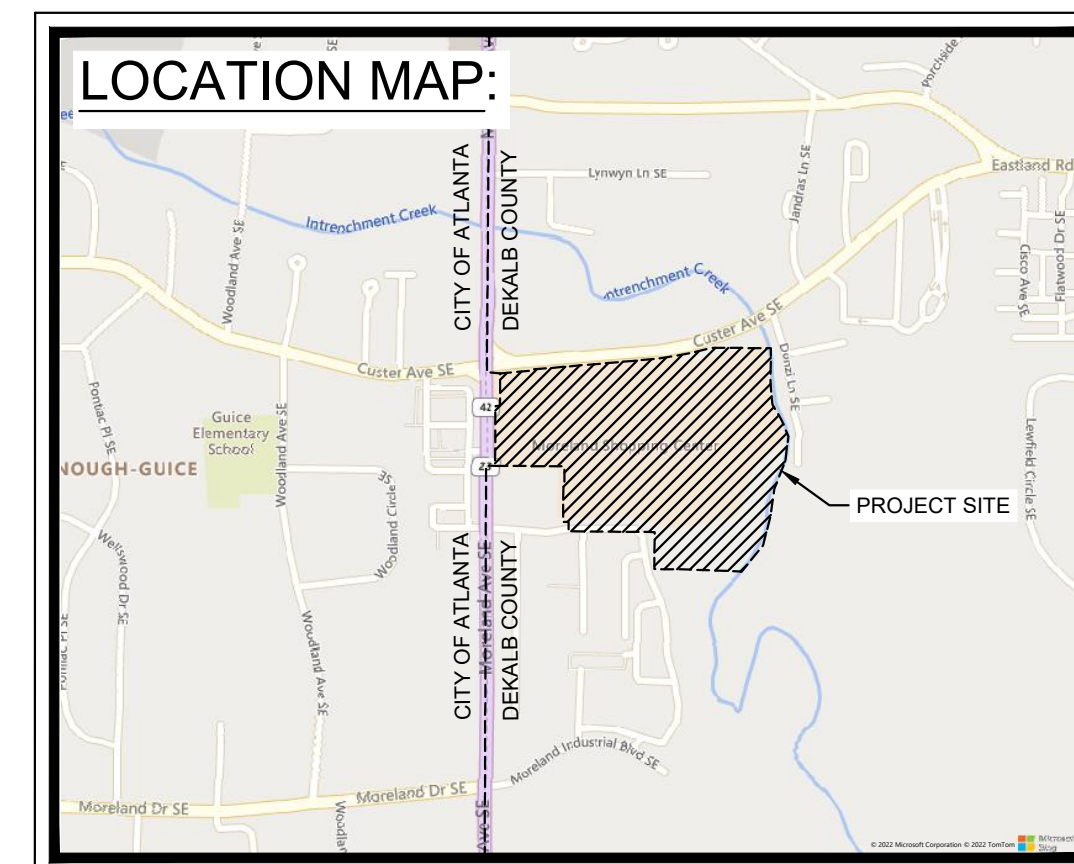


<u>PROPOSED LAND USE USES & DENSITIES</u>	
LAND USE	DENSITY
RETAIL	19,500 SF
MULTI-FAMILY RESIDENTIAL	413 UNITS
TOWNHOME RESIDENTIAL	260 UNITS

APPLICANT: EAH ACQUISITIONS, LP
5775 GLENRIDGE DRIVE, BLDG D
SUITE 350
ATLANTA, GA 30308
CONTACT: KEVIN NORTON, PE
PHONE: 770.541.8910

TRAFFIC CONSULTANT: A&R ENGINEERING
2160 KINGSTON COURT, SUITE O
MARINETTA, GA 30067
CONTACT: ABDUL AMER, PE, PTOE
PHONE: 770.690.9255

CIVIL ENGINEER: KIMLEY-HORN & ASSOCIATES
817 W PEACHTREE STREET NW
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ATLANTA, GA 30308
CONTACT: BEN SKIDMORE, P.E.
PHONE: 404.419.8700



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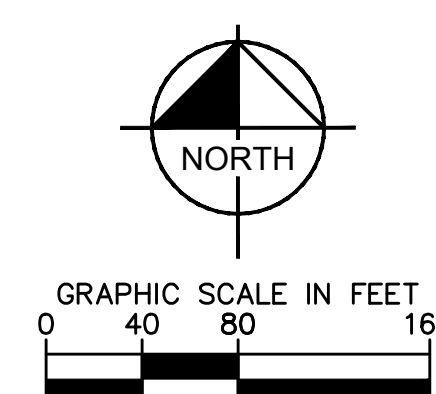
EAH ACQUISITIONS, LP
5775 GLENHEDGE DR. SUITE 350, ATLANTA, GA 30328
PHONE: 770.541.6910

[illegible]

MORELAND & CUSTER
1296 MORELAND AVENUE SE, ATLANTA, GA 30316
LAND LOT 113, 15TH DISTRICT

GSWCC CERT. (LEVEL II)	0000062135
DRAWN BY	HED
DESIGNED BY	MCP
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DATE	04/21/2022
PROJECT NO.	015002008
TITLE	
DRI SITE PLAN	
SHEET NUMBER	
C0-20	

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