

DATE: May 19, 2022

TO: Mayor Andre Dickens, City of Atlanta
ATTN TO: Monique Forte, Planner III, City of Atlanta
RE: Development of Regional Impact (DRI) Review
FROM: Mike Alexander, Director, ARC Center for Livable Communities

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: Moreland and Custer DRI 3586

Submitting Local Government: City of Atlanta

Date Opened: May 19, 2022

Deadline for Comments: June 3, 2022 **Date to Close:** June 8, 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 is currently developed as a large strip mall with an extensive surface parking area.

PRELIMINARY COMMENTS:

Key Comments

The project is generally aligned with applicable Maturing Neighborhoods growth policy recommendations which call for the redevelopment of previously developed sites with higher-density mixed-use development that respects existing single-family neighborhoods while adding amenities such as trails, sidewalk, and green spaces.

The project is projected to generate 4,204 new vehicular trips; 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 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 incorporates several elements proposed for the site in the 2008 South Moreland Livable Centers Initiative study but does not achieve the overall goal of creating a mixed-use neighborhood with a range of housing and commercial uses organized around a strong, walkable internal street grid with appealing urban design and placemaking components. Several proposed elements including the one-story stand-alone retail at the corner of Moreland and Custer and proposed Moreland Avenue deceleration lane are not supportive of key LCI goals.

The proposed three driveways along Custer Avenue conflict with the proposed South River Trail segment along the northern frontage.

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 in a one-story stand-alone building 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 purposed of the LCI was to move beyond this auto-oriented development pattern, especially at key nodes that is also 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 project more consistent with the goals and vision of the LCI study.

Transportation and Mobility Comments

ARC's Transportation and mobility Group comments will be provided in the Final Report.

The project is expected to generate a gross total of 4666 daily new trips which will be reduced to 4204 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 with the site along Intrenchment Creek could have a more winding layout.

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 comments will be provided in the Final Report.

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.

Unified Growth Policy Recommendations: Maturing Neighborhoods

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 the 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. Some aspects of the project related to mixed-use, 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 TRANSPORTATION

GEORGIA ENVIRONMENTAL FINANCE AUTHORITY

MARTA

GEORGIA DEPARTMENT OF NATURAL RESOURCE

GEORGIA REGIONAL TRANSPORTATION AUTHORITY

GEORGIA CONSERVANCY

CITY OF ATLANTA

GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS

GEORGIA SOIL AND WATER CONSERVATION COMMISSION

DEKALB 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 located at <http://atlantaregional.org/plan-reviews>.



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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:

RezoningVarianceSewerWater

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 Dates:

This project/phase: 2024

Overall project: 2024

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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.

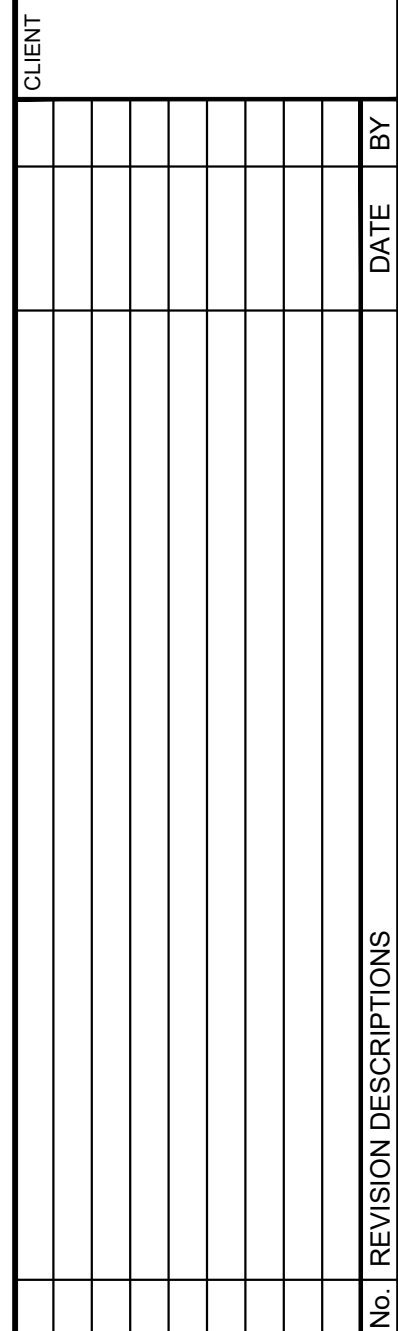
Environmental Quality

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:

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PROJECT	MORELAND & CUSTER 1296 MORELAND AVENUE SE ATLANTA, GA 30316 LAND LOT 113, 15TH DISTRICT	
GSWCC CERT. (LEVEL II)		00000062135
DRAWN BY		HED
DESIGNED BY		MCP
REVIEWED BY		BWS
DATE		04/21/2022
PROJECT NO.		015002008
TITLE		
DRI SITE		
PLAN		
SHEET NUMBER		
C0-20		

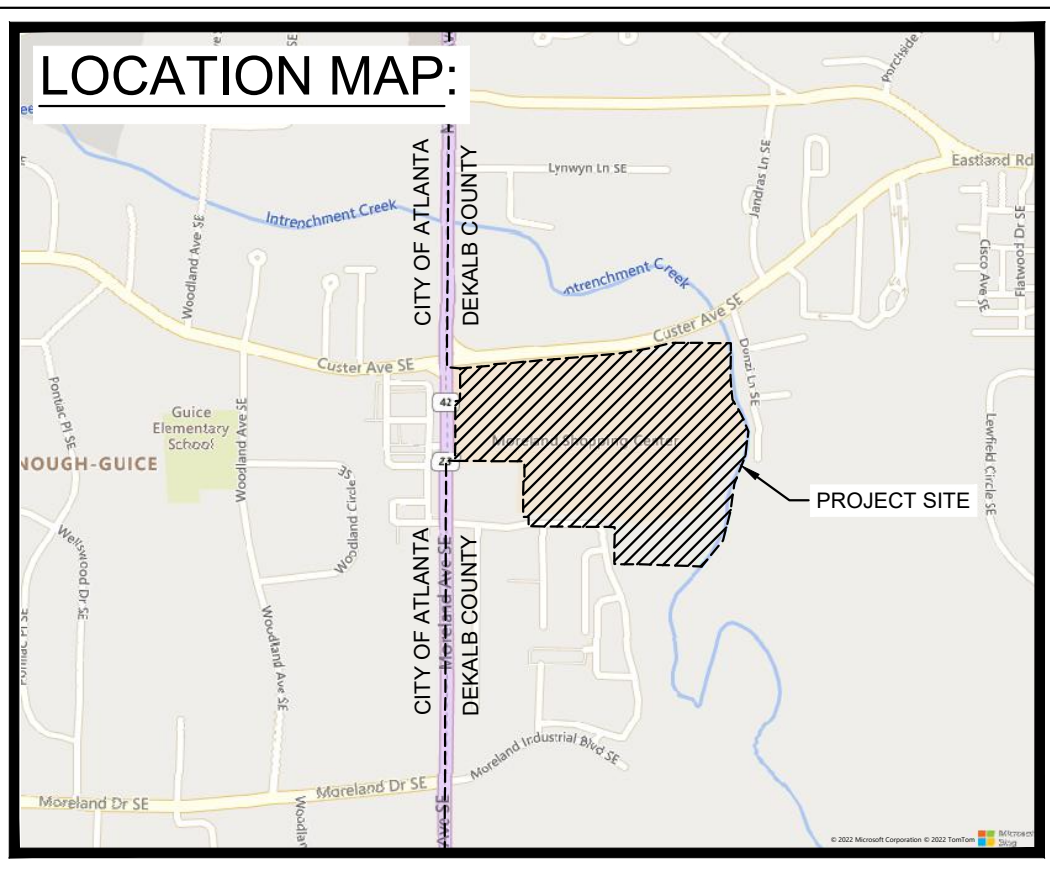
<p>EAH ACQUISITIONS, LP 5775 GLENFIDE DR. BUILDING D, SUITE 350 ATLANTA, GA 30328 PHONE: 770.541.6910</p>	<p>Kimley»Horn 5050 PINEHURST AVENUE ASSOCIATES, INC. 817 W. PEACHTREE STREET, NW THE BALTIMORE SUITE 901 ATLANTA, GEORGIA 30308 PHONE: 404.525.1100 WWW.KIMLEY-HORN.COM</p>
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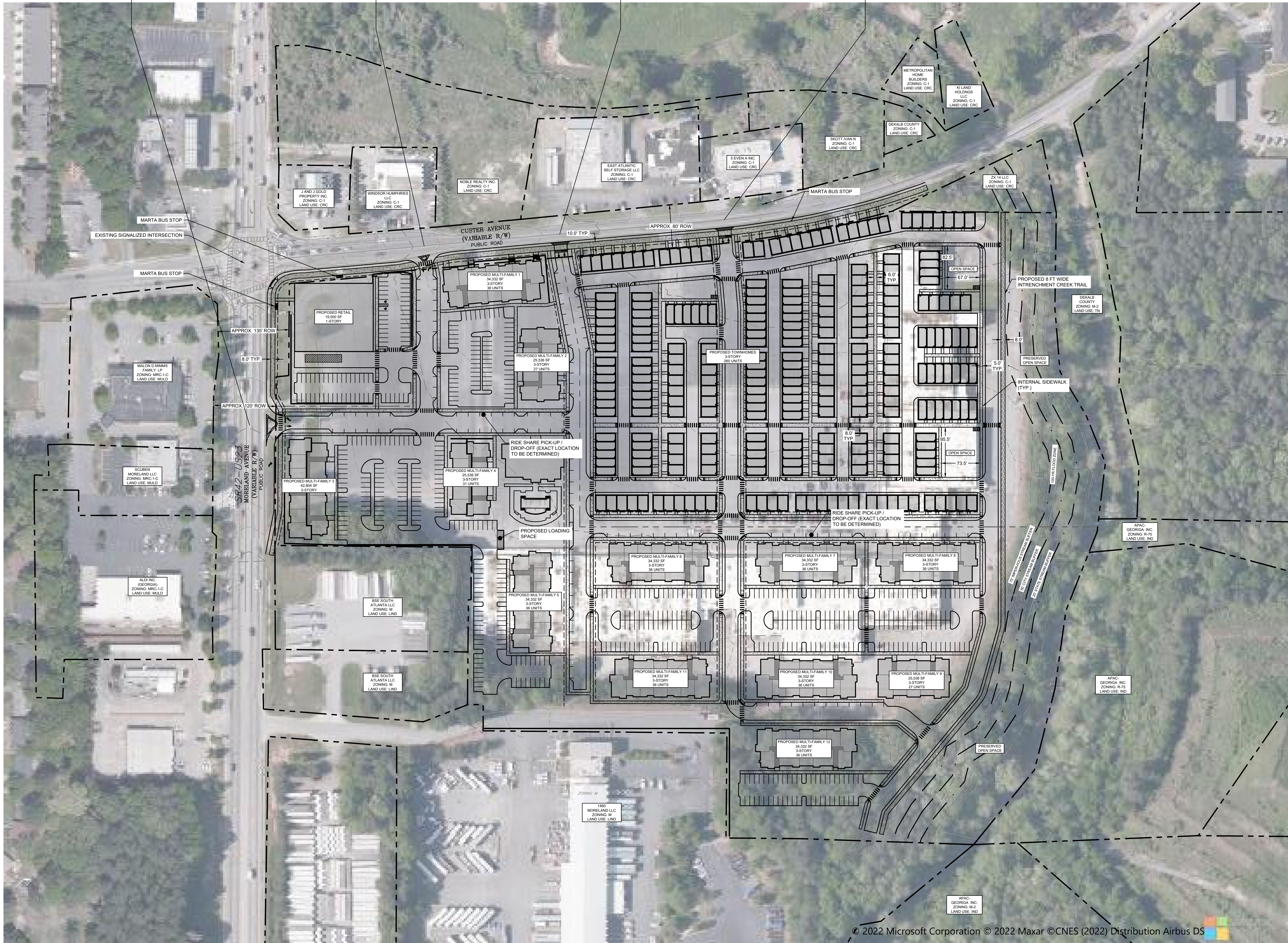
SITE NOTES:	
<u>DRI NUMBER</u>	#3586
<u>CURRENT ZONING</u>	MRC-1-C
<u>OVERALL SITE AREA</u>	31.88 AC
<u>TOTAL FLOOR AREA</u>	722,288 SF
<u>PROPOSED DENSITY RATIOS</u>	
RESIDENTIAL:	21.1 UNITS / ACRE
NON-RESIDENTIAL FAR:	0.014 X NLA
<u>OPEN SPACE</u>	
REQUIRED OPEN SPACE	0.44 " NLA = 624,766 SF
OPEN SPACE PROVIDED	0.46 " NLA = 636,674 SF
<u>PARKING:</u>	
MINIMUM REQUIRED:	753 SPACES
PROVIDED:	1,140 SPACES

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

PROJECT CONTACTS:

<u>APPLICANT:</u>	EAH ACQUISITIONS, LP 5775 GLENRIDGE DRIVE, BLDG D SUITE 350 ATLANTA, GA 30308 CONTACT: KEVIN NORTON, PE PHONE: 770.541.6910
<u>TRAFFIC CONSULTANT:</u>	A&R ENGINEERING 2160 KINGSTON COURT, SUITE O MARIETTA, GA 30067 CONTACT: ABDUL AMER, PE, PTOE PHONE: 770.690.9255
<u>CIVIL ENGINEER:</u>	KIMLEY-HORN & ASSOCIATES 817 W PEACHTREE STREET NW SUITE 601 ATLANTA, GA 30308 CONTACT: BEN SKIDMORE, P.E. PHONE: 404.419.8700





LOCATION MAP:

The map shows the City of Atlanta and DeKalb County. The Project Site is located in the southeast corner of the City of Atlanta, near the intersection of Highway 284 and Highway 20. The Project Site is highlighted with a hatched pattern. The map also shows the city limits of Atlanta and DeKalb County, and the location of the Atlanta-Fulton County Stadium.

PROJECT	
GSWCC CERT. (LEVEL II)	0000062135
DRAWN BY	HED
DESIGNED BY	MCP
REVIEWED BY	BWS
DATE	04/21/2022
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