

DATE: December 10, 2024

TO: Mayor Khalid Kamau, City of South Fulton
ATTN TO: Reginald McClendon, Managing Director, Community Development, City of South Fulton
FROM: Mike Alexander, COO, Atlanta Regional Commission
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: Lofts at South Fulton DRI 4237

Submitting Local Government: City of South Fulton

Date Opened: November 21, 2024

Date Closed: December 10, 2024

Description: A DRI review of a proposal to construct an apartment complex with a total of 842 multi-family units along with 2,000 SF of commercial space on a 42-acre site at 7995 Spence Road in the City of South Fulton.

Comments:

Key Comments

The Atlanta Region's Plan assigns the Developing Suburbs growth management designation to the project site. The project is not aligned with Developing Suburbs policy recommendations which state "There is a need in these areas for additional preservation of critical environmental locations and resources, as well as agricultural and forest uses."

The project could be somewhat better aligned with Developing Suburbs policies through retention of additional undisturbed areas around stream and wetland areas and utilizing a low-impact design and construction approach to reduce total disturbed area.

The project will eliminate much of the currently heavily forested site which will exacerbate local and regional heat island and climate change impacts. Additional retention of natural forested areas is strongly recommended and in keeping with regional goals regarding carbon sequestration and climate change/heat

island effect mitigation. The provision of some retail space for convenience items within walking distance is supportive of regional multi-modal transportation and walkability policies.

The project will generate a total of 4,079 daily new vehicular trips. A range of roadway modifications are proposed to address this impact.

The large areas of surface parking should include additional shade trees for heat mitigation and employ green infrastructure including pervious pavement and curbside tree planting islands to reduce stormwater impacts.

Substantial areas of the development extend into identified flood plain areas creating potential flooding concerns and risks. While some of these may pose different levels of flood risks, overall flood risk should be minimized to the greatest extent possible and all flood zone regulatory requirements should be met.

Substantial portions of the development including parking areas and parts of buildings 1 and 2 are shown extending into stream buffers. Fayette County submitted comments noting that this stream is currently impaired, which requires frequent costly monitoring, and requesting that the required stream buffers be maintained without intrusions and degradation.

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. The Plan assigns a relevant growth management category designation with accompanying policy recommendations to all areas in the region. This DRI site is designated Developing Suburbs; associated policy recommendations are provided at the end of these comments.

Transportation and Mobility Comments

The project will generate a total of 4,079 daily new vehicular trips. A number of roadway modifications are proposed to address this impact.

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 Resources Comments

ARC's Natural Resources Group comments are attached.

Stream Buffers Both the USGS coverage for the project area and the proposed project site plan show an unnamed perennial blue line tributary to Whitewater Creek running roughly north northwest to south southeast through the project property. The site plan shows the 25-foot State Sediment and Erosion Control Buffer as well as the City's 75-foot undisturbed buffer and additional 25-foot impervious surface setback. The plan also shows a buffer identified as a County 50-foot undisturbed buffer. This appears to be redundant as the City buffer is deeper and City ordinances usually replace County ordinances after incorporation. If the 50-foot buffer is not required by the city, it should be removed. The site plan also shows the same City, County and State buffers around an existing pond on the property.

The plan shows two stream crossings and parking areas within the mapped stream buffers, as well as parking areas within the buffers around the pond. While the stream crossings are exempt under the South Fulton Stream Buffer Ordinance, both the parking areas in the stream buffers and the pond buffers may require variances from the City and the State.

Floodplain

The site plan shows a floodplain area identified as Flood Zone X, or the 500-year floodplain. The area shown is consistent with the current online FEMA floodplain maps, which do not show a 100-year floodplain zone on this portion of the stream. But while the FEMA definition of Flood Zone X is primarily for the 500-year floodplain (0.2% annual flood chance hazard), it also includes areas of 1% annual chance flood {100-year floodplain} with average depth less than one foot or with drainage areas of less than one square mile. The site plan shows development within the flood plain area, including parking areas and portions of Buildings 1 and 2. Development within the floodplain areas will need to meet all applicable requirements under the City's floodplain and future floodplain ordinances. Any development that is outside the existing floodplain but inside the City's identified future floodplain will need to meet all applicable requirements of the City's future floodplain ordinance.

Wetlands

The submitted site plan shows wetlands areas and identifies areas of wetland disturbance. However, there is no differentiation between the wetland areas and the disturbed areas. The plan should show both the total acreage and the disturbed acreage of each wetland area on the plans, and the proposed disturbed areas should be identified and differentiated from the undisturbed wetlands

Other Environmental Comments

The project will eliminate much the currently heavily forested site which will exacerbate local and regional heat island and climate change impacts. Retention of additional natural forested areas is strongly recommended and in keeping with regional goals regarding carbon sequestration and climate change/heat island effect mitigation. The large areas of surface parking should include additional shade trees for heat mitigation and employ green infrastructure including pervious pavement and curbless tree planting islands to reduce stormwater impacts.

Substantial areas of the development extend into identified flood plain areas. While some of these may pose different levels of flood risks, overall flood risk should be minimized to the greatest extent possible and all flood zone regulatory requirements should be met.

Fayette County Comments

Comments received from Fayette County are attached. This DRI and multiple other nearby DRI's will generate a substantial number of vehicular trips that will impact the intersection of Highway 74 and I-85 which will be the subject of proposed GDOT interchange improvements. It should be ensured that the plans for this interchange accomodate all of the traffic anticipated to be generated by these projects.

The creek and wetlands shown on the conceptual site map eventually enter the Fayette County White Water Creek watershed. This stream is currently impaired and requires costly frequent monitoring by the County. The development plan appears to show significant intrusions in the the stream buffers that project this stream and its water quality. Fayette County therefore requests that the City of South Fulton maintain the existing stream buffers for the project and that planned stormwater management facilities elsewhere on the site follow the Georgia Stormwater Management Manual Best Management Practices.

Atlanta Region's Plan Growth Policy Considerations: Developing Suburbs

The Atlanta Region's Plan identifies Developing Suburbs as areas in the region where suburban development has occurred, and the conventional development pattern is present but not set. These areas are characterized by residential development with pockets of commercial and industrial development. These areas represent the extent of the urban service area. There is a need in these areas for additional preservation of critical environmental locations and resources, as well as agricultural and forest uses. Limited existing infrastructure in these areas will constrain the amount of additional growth that is possible. Transportation improvements are needed within these Developing Suburbs, but care should be taken not to spur unwanted growth.

The project is not aligned with Developing Suburbs policy recommendations which state "There is a need in these areas for additional preservation of critical environmental locations and resources, as well as agricultural and forest uses." It could be better aligned through retention of additional undisturbed areas around streams and utilization of green infrastructure and low impact development in the construction approach. City of South Fulton 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 CONSERVANCY
GEORGIA ENV. FACILITIES AUTHORITY	GEORGIA DEPARTMENT OF NATURAL RESOURCES	GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS
GEORGIA SOIL AND WATER CONSERVATION COMMISSION	CITY OF SOUTH FULTON	CITY OF UNION CITY
CITY OF FAIRBURN		

For questions, 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>



Developments of Regional Impact

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Thank you for submitting your application. The DRI Application Number is 4237. To view the application at any time, you can go to <http://apps.dca.ga.gov/DRI/AppSummary.aspx?driid=4237>. Please contact your RDC if you have any questions or need to change any of the information on this form.

DRI #4237

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: South Fulton
Individual completing form: Reginald McClendon
Telephone: 4706930565
E-mail: reginald.mcclendon@cityofsouthfultonga.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: Lofts at South Fulton
Location (Street Address, GPS Coordinates, or Legal Land Lot Description): 7995 Spence Road, Fairburn, GA 30213(09F060000250349, 09F030000140345, 09F060000251172)
Brief Description of Project: Rezoning request for an apartment complex with a total of 842 units to be built in two phases on 41.724 acres (31 disturbed acres) and 2,000 sq. feet of commercial.

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.): 842 units

Developer: WB Properties

Mailing Address: 495 Broadway

Address 2:

City: New York State: NY Zip: 10012

Telephone: 917-670-8267

Email: david@wbpropertygroup.com

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

If yes, property owner: Edward Mellon

Is the proposed project entirely located within your local government's jurisdiction? ☐ (not selected) ☒ Yes ☐ No

If no, in what additional jurisdictions is the project located?

Is the current proposal a continuation or expansion of a previous DRI? ☐ (not selected) ☐ Yes ☒ No

If yes, provide the following information: Project Name:
Project ID:

The initial action being requested of the local government for this project: ☒ Rezoning ☒ Variance ☐ Sewer ☐ Water ☐ Permit ☐ Other

Is this project a phase or part of a larger overall project? ☐ (not selected) ☐ Yes ☒ No

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

Estimated Project Completion Dates: This project/phase: 2027
Overall project:

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Thank you for submitting your application. The DRI Application Number is 4237. To view the application at any time, you can go to <http://apps.dca.ga.gov/DRI/AppSummary.aspx?driid=4237>. Please contact your RDC if you have any questions or need to change any of the information on this form.

DRI #4237

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: South Fulton
Individual completing form: Reginald McClendon
Telephone: 4706930565
Email: reginald.mcclendon@cityofsouthfultonga.gov

Project Information

Name of Proposed Project: Lofts at South Fulton
DRI ID Number: 4237
Developer/Applicant: WB Properties
Telephone: 917-670-8267
Email(s): david@wbpropertygroup.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: \$50,000,000

Estimated annual local tax revenues (i.e., property tax, sales tax) likely to be generated by the proposed development: \$1,200,000

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 (DWM)

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

0.2059 MGD

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:
There is no water main currently available to service the site. A main extension would be required to provide water to the site.

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?
TBD

Wastewater Disposal

Name of wastewater treatment provider for this site: Fulton County

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

0.2059 MGD

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.)

364 Trips in the AM Peak Hour, 342 Trips in the PM Peak Hour

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:

Solid Waste Disposal

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

unknown

Is sufficient landfill capacity available to serve this proposed project? ☐ (not selected) ☐ Yes ☒ No

If no, describe any plans to expand existing landfill capacity: The answer to question was not provided by developer. The City has answered "no" out of an abundance of caution.

Will any hazardous waste be generated by the development? ☐ (not selected) ☒ Yes ☐ No

If yes, please explain: The answer to question was not provided by developer. The City has answered "yes" out of an abundance of caution.

Stormwater Management

What percentage of the site is projected to be impervious surface once the proposed development has been constructed? 43%

Describe any measures proposed (such as buffers, detention or retention ponds, pervious parking areas) to mitigate the project's impacts on stormwater management: One above ground stormwater detention system.

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:

Significant groundwater recharge areas will be proposed for run-off reduction requirement. Wetlands is onsite per survey. Disturbance will be limited within the area. Floodplain is onsite. Floodplain disturbance will be limited.

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LOFTS AT SOUTH FULTON DRI
City of South Fulton
Natural Resources Review Comments

December 6, 2024

While ARC and the Metropolitan North Georgia Water Planning District have no regulatory or review authority over this project, the Natural Resources Department has identified City and State regulations that could apply to this property. Other regulations may also apply that we have not identified.

Watersheds

The proposed project property is within the Whitewater Creek watershed which was formerly a public water supply source for the City of Fayetteville and for Fayette County Fayetteville and Fayette County have both decommissioned it as a water supply source and the withdrawal permits are being allowed to expire. No DNR Part 5 Water Supply Watershed Minimum Criteria apply.

Stream Buffers

Both the USGS coverage for the project area and the proposed project site plan show an unnamed perennial blue line tributary to Whitewater Creek running roughly north northwest to south southeast through the project property. The site plan shows the 25-foot State Sediment and Erosion Control Buffer as well as the City's 75-foot undisturbed buffer and additional 25-foot impervious surface setback. The plan also shows a buffer identified as a County 50-foot undisturbed buffer. This appears to be redundant as the City buffer is deeper and City ordinances usually replace County ordinances after incorporation. If the 50-foot buffer is not required by the city, it should be removed. The site plan also shows the same City, County and State buffers around an existing pond on the property.

The plan shows two stream crossings and parking areas within the mapped stream buffers, as well as parking areas within the buffers around the pond. While the stream crossings are exempt under the South Fulton Stream Buffer Ordinance, both the parking areas in the stream buffers and the pond buffers may require variances from the City and the State.

Any unmapped streams on the property may also be subject to the South Fulton Stream Buffer Ordinance. Any unmapped streams as well as any other waters of the state on this property are also subject to the State 25-foot Sediment and Erosion Control Buffer.

Floodplain

The site plan shows a floodplain area identified as Flood Zone X, or the 500-year floodplain. The area shown is consistent with the current online FEMA floodplain maps, which do not show a 100-year floodplain zone on this portion of the stream. But while the FEMA definition of Flood Zone X is primarily for the 500-year floodplain (0.2% annual flood chance hazard), it also includes areas of 1% annual chance flood {100-year floodplain} with average depth less than one foot or with drainage areas of less than one square mile. The site plan shows development within the flood plain area, including parking areas and portions of Buildings 1 and 2. Development within the floodplain areas will need to meet all applicable requirements under the City's floodplain and future floodplain ordinances.

Lofts at South Fulton DRI
Natural Resources Comments
December 6, 2024
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Any development that is outside the existing floodplain but inside the City's identified future floodplain will need to meet all applicable requirements of the City's future floodplain ordinance.

Wetlands

The submitted site plan shows wetlands areas and identifies areas of wetland disturbance. However, there is no differentiation between the wetland areas and the disturbed areas. The plan should show both the total acreage and the disturbed acreage of each wetland area on the plans, and the proposed disturbed areas should be identified and differentiated from the undisturbed wetlands.

Stormwater/Water Quality

During the planning phase, the stormwater management system (system) should meet the requirements of the City of South Fulton's post-construction stormwater management ordinance. The system design should also be in accordance with the applicable sections of the Georgia Stormwater Management Manual (GSMM) such as design standards, calculations, formulas, methods, and runoff reduction practices sized and designed to retain the first 1.0 inch of rainfall (Runoff Reduction Volume) on the site to the maximum extent practicable. 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.

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

December 5, 2024

Donald P. Shockey
Plan Review Manager
Atlanta Regional Commission
International Tower
229 Peachtree Street NE | Suite 100
Atlanta, Georgia 30303

Subject: DRI #4237 – Fayette County Comments

Dear Mr. Shockey:

Fayette County has seen the DRIs listed below that will impact the intersection along Hwy 74 and I-85 all dependent on the proposed GDOT improvements of the interchange. This additional development utilizes this intersection to some extent. GDOT future plans for this intersection should be reviewed for the projects that have completed traffic reports in the area and that will be moving forward to ensure the planned GDOT interchange improvement project will accommodate the listed projects.

DRI – 3628 Hwy 74 Business Tech Park, final report 7/21/2022.

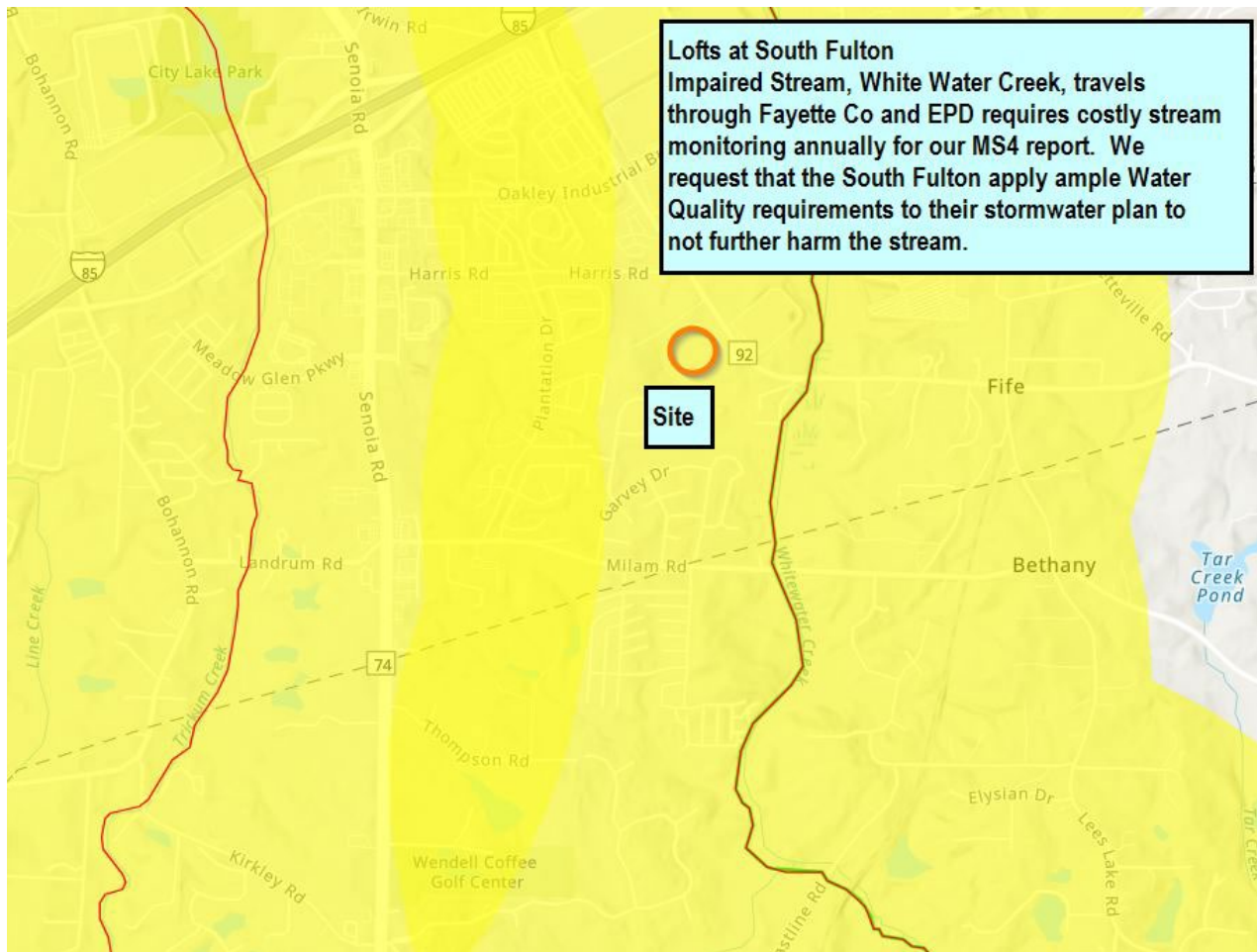
DRI – 3813 QTS, final report 1/3/2023

DRI – Trilith Expansion, Staff recommendations 11/14/2022

DRI – 4213 Fairburn Technology center, Notice of decision 8/19/2024

DRI – 4315 ATL03 Red Oak, current proposal

The creek and wetlands shown on the conceptual site map eventually enters the Fayette County White Water Creek watershed. This stream also runs through portions of the City of Fayetteville. Fayette County would request that the City of South Fulton maintains existing stream buffers for the project and that the planned stormwater management facilities will follow the Georgia Stormwater Management Manual BMP requirements since the stream is impaired as it crosses into Fayette County per the latest data.



Sincerely,

Deborah L Bell

Deborah L. Bell, RLA
Director

