

June 8, 2006

Mr. Mike Alexander
Atlanta Regional Commission (ARC)
40 Courtland Street, N.E.
Atlanta, GA 30303

**RE: Development of Regional Impact (DRI #1058)
Northeast Atlanta Beltline**

The Metropolitan Atlanta Rapid Transit Authority (MARTA) has completed review of documentation for a proposed Development of Regional Impact called Northeast Atlanta Beltline Development.

The Northeast Atlanta Beltline Development directly impacts MARTA's Atlanta Beltline Alternatives Analysis Study that is currently ongoing. MARTA staff had earlier met with ARC staff to discuss this DRI and, in a correspondence dated May 24, 2006, communicated to ARC MARTA's position on the proposed development. A copy of this letter is attached herewith for your reference. MARTA wishes to reiterate its position based on the content of the earlier letter.

Thank you for the opportunity to review the proposal. Please let me know if you have any questions.

Sincerely,



Henry Ikwut-Ukwa
Transit System Planning

404-668-2885
hikwut@itsmarta.com

Attachment: MARTA Letter

CC: Gloria Gaines, *AGM Planning*
Darryl Connelly, *Director, TOD and Real Estate*
Thelma Hayes, *Director, Transit System Planning*
Johnny Dunning, Jr., *Manager, Regional Planning and Analysis*

Haley Fleming

From: Doug Young [DYoung@AtlantaGa.Gov]
Sent: Wednesday, May 31, 2006 3:06 PM
To: Haley Fleming
Cc: Steven R. Cover; Karen Huebner; Alice Wakefield; ebcoyle@midnspring.com
Subject: DRI #1058 - Northeast Atlanta Beltline - AUDC Comments and Information

Haley Fleming –

After reviewing the preliminary report dated May 25, 2006, the Atlanta Urban Design Commission, as part of the City of Atlanta's Department of Planning and Community Development, would like to offer the following comments and information regarding ARC's review of DRI #1058 – "Northeast Atlanta Beltline". Specifically, the Urban Design Commission Staff can provide ARC with information regarding properties listed in the National Register of Historic Places, as well as properties that would be eligible for listing in the National Register of Historic Places.

While not knowing the exact distance considered "near" by ARC, the following districts and buildings are currently listed in the National Register of Historic Places and are located immediately adjacent to or within about ½ mile of the project location:

1. Ansley Park Historic District (immediately adjacent)
2. Virginia Highland Historic District (immediately adjacent)
3. Piedmont Park Historic District (immediately adjacent)
4. Midtown Historic District (immediately adjacent)
5. Inman Park Historic District (immediately adjacent)
6. Martin Luther King, Jr. Historic District (immediately adjacent)
7. Martin Luther King, Jr. National Historic Site
8. Cabbagetown Historic District
9. Oakland Cemetery Historic District
10. Rock Springs Presbyterian Church – 1824 Piedmont Avenue
11. Habersham Memorial Hall – 15th Street
12. Piedmont Park Apartments – 266 11th Street
13. Troy Peerless Laundry Building – 650 Glen Iris Drive
14. Empire Manufacturing – 575 Glen Iris Drive
15. Southern Dairies Building – North Avenue
16. Ford Motor Company Building – 699 Ponce de Leon Avenue (immediately adjacent)
17. Griffith School of Music – 650 Bonaventure Street
18. Western Electric Company Building – 820 Ralph McGill Boulevard (immediately adjacent)
19. National NuGrape Company Building – 794 Ralph McGill Boulevard (immediately adjacent)

In addition, the AUDC has recently completed an initial historic resource survey of the Beltline in which it identified and evaluated buildings, structures, and sites within the Beltline TAD for National Register eligibility.

These listings generally consist of several potential districts, as well as individual commercial, industrial, institutional, and other non-residential buildings located along or near the Beltline. Given the high number of individual properties, I have listed the streets on which the individual properties are located to give a sense of where they are located and the approximate number of properties on that street. More exact information can be provided later, if necessary. The individual properties are not currently listed individually or as part of a district. The AUDC Staff considers the districts and the properties on the streets listed below to be potentially eligible for listing in the National Register of Historic Places and are located immediately adjacent to or within ½ mile of the project location:

Potential Districts:

1. Sherwood Forest
2. Piedmont Heights
3. Morningside – Lenox Park
4. Poncey Highland
5. Old Fourth Ward

Streets with Potential Individual Properties:

6. Piedmont Avenue (19)
7. Dutch Valley Road (11)
8. Ralph McGill Boulevard (9)
9. Ponce de Leon Avenue (9)
10. Edgewood Avenue (6)
11. Ponce de Leon Place (5)
12. Krog Street (3)
13. Glen Iris Drive (3)
14. Angier Avenue (3)
15. Virginia Avenue (3)
16. Elizabeth Street (3)
17. Dallas Street (2)
18. Dekalb Avenue (1)
19. North Avenue (1)
20. Amsterdam Drive (1)
21. Greenwood Avenue (1)
22. Morgan Street (1)
23. Drewry Street (1)
24. Irwin Street (1)
25. John Wesley Dobbs Avenue (1)
26. Sampson Street (1)

In conjunction with other DPCD analysis, additional study of the National Register eligibility of the individual properties is currently ongoing. The AUDC Staff's determination about National Register eligibility based on additional research and whether they should be grouped into new or existing districts will be completed later this summer.

At this time, it is the AUDC Staff's purpose to note for the DRI review that there are many National Register listed or eligible properties (districts and buildings) adjacent to or near the project's location.

The AUDC Staff would be more than happy to discuss its findings at length with all interested parties at the appropriate point in the process. Please let us know if you have any questions and thank you for the opportunity to comment on the DRI review.

Doug Young, Historic Preservation Planner
Atlanta Urban Design Commission
Suite 3400
55 Trinity Avenue, SW
Atlanta, GA 30335
(404) 330-6200 - phone
(404) 658-6734 - fax
DYoung@AtlantaGa.gov - email
www.AtlantaGa.gov - City Website

Haley Fleming

From: Mike Alexander
Sent: Tuesday, May 30, 2006 1:07 PM
To: Koch, Christopher
Cc: Haley Fleming
Subject: RE: Preliminary Findings of the RDC: Northeast Atlanta Beltline

Thanks! It is our preliminary report, so we are looking for comments just like this one. Again thanks!

Mike Alexander
404 463 3302
malexander@atlantaregional.com

From: Koch, Christopher [mailto:cpkoch@terracon.com]
Sent: Tuesday, May 30, 2006 12:42 PM
To: Mike Alexander
Subject: Preliminary Findings of the RDC: Northeast Atlanta Beltline

Dear Mr. Alexander,

I have just skimmed the above report and I noted that on page 9 that the report states that no National Register sites have been identified near the proposed project.

It is my understanding that Piedmont Park is currently listed on the National Register of Historic Places.

If need be, I can email you a PDF copy of the nomination form that is on file with the Historic Preservation Division.

Best wishes,

Chris

Christopher P. Koch, Ph.D., R.P.A.
Senior Archaeologist | CRM Group
Terracon
2855 Premiere Parkway, Suite C | Duluth, Georgia 30097
P 770-623-0755 | F 770-623-9628 | M 404-759-5816
cpkoch@terracon.com | www.terracon.com

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providing multiple related service lines to local, regional, and national clients.*

Haley Fleming

From: Steven_M_Wright@nps.gov
Sent: Monday, June 05, 2006 9:59 AM
To: Haley Fleming
Subject: DRI Review Notification- Northeast Atlanta Beltline #1058

Attachments: Preliminary Report.pdf



Preliminary
Report.pdf (838 KB..

Mr. Fleming,

It's unclear after reviewing the project description and associated site maps if there are any impacts to the existing Piedmont Park. Is any additional right of way or property required from Piedmont Park to facilitate this project?

Thank you,

Steven M. Wright
National Park Service
Southeast Regional Office
Planning & Compliance Division
(404) 562-3124, ext. 660
(404) 562-3257 fax
Steven_M_Wright@nps.gov

"Haley Fleming"
<HFleming@atlantaregional.com>
<carol_couch@mail.dnr.state.ga.us>, <BBorden@grta.org>, <cindy.vandyke@dot.state.ga.us>,
<harold.linnenkohl@dot.state.ga.us>, <joe.palladi@dot.state.ga.us>, "'Debbie
Minness" <dminess@dca.state.ga.us>, "Robin
05/25/2006 03:13 PM
<lbeall@grta.org>, <Hal.Wilson@dot.state.ga.us>, <RBechtel@GRTA.org>,
AST <steve.yost@dot.state.ga.us>, "Harry
Graham \ (E-mail\)" <harry.graham@dot.state.ga.us>,
"Stinson, Will" <wstinson@itsmarta.com>, <morgan.ellington@co.fulton.ga.us>,
<Nicole.hall@co.fulton.ga.us>, <karen.handel@co.fulton.ga.us>,
<ibrahim.maslamani@co.fulton.ga.us>, <ceo@co.dekalb.ga.us>,
<pejike@co.dekalb.ga.us>, <aduncan@co.dekalb.ga.us>, "Dunning,
Johnny Jr." <jdunning@itsmarta.com>,
<superintendent@atlanta.k12.ga.us>, <path@pathfoundation.org>,
<ggiornelli@atlantada.com>, "Tina Arbes" <tarbes@atlantada.com>, "James Stokes"
<jstokes@gaconservancy.org>, <Info@BeltLinePartnership.org>,
<bfloyd@decaturga.com>, <von@mac.com>, <pathf@ix.netcom.com>,
<david.dwyer@atlantahousing.org>, <charlotte_gillis@nps.gov>,
<james.langford@tpl.org>,

Haley Fleming

From: Robin Bechtel [RBechtel@GRTA.org]
Sent: Wednesday, June 21, 2006 1:31 PM
To: Mike Alexander; Haley Fleming; Laura Beall
Subject: FW: Northeast Atlanta Beltline DRI
Attachments: Beltline Typical Sections.ppt

FYI- Thanks!

Robin Bechtel

Senior Land Use Planner
Georgia Regional Transportation Authority
245 Peachtree Center Avenue, NE
Suite 900
Atlanta, GA 30303
Phone (404) 463-3052
Fax (404) 463-3060
rbechtel@grta.org

From: Yost, Steve [mailto:Steve.Yost@dot.state.ga.us]
Sent: Wednesday, June 21, 2006 11:57 AM
To: rbechtel@grta.org
Subject: Northeast Atlanta Beltline DRI

Robin:

It was nice to meet you and finally be able to place a face with your name. Thank you for allowing me to make comments on the DRI application # 1058 (Northeast Atlanta Beltline) at this late date.

Earlier this year, we contacted Ms. Helen Tapp (JJ&G) and provided her with our comments on the NE Beltline Transit Feasibility Study (a study that was commissioned by Mr. Wayne Mason). Below are the points we made in our correspondence - all of which are still valid concerns of ours.

- No mention of the Georgia Rail Passenger Program (GRPP) network and, in particular, the affects of its implementation on this specific corridor is made in the report. Since GRPP's commuter rail plan has been well-defined in past years, a discussion should be included. Consequently, the study fails to identify opportunities for GRPP's commuter rail lines from Madison and Gainesville to connect to the transit options proposed by the study for the Decatur Belt. [The study should emphasize connectivity to all forms of public transportation that may be existing or planned in the Decatur Belt or Tax Allocation Area (TAD) area.]
- GRPP identified the Decatur Beltline Railroad (Decatur Belt) as the route for intercity AMTRAK trains, the route for Southeast High Speed Rail (SEHSR) to Charlotte, and the route for commuter trains from Gainesville to access the Multi-Modal Passenger Terminal (MMPT) station. Again, these are well established programs and projects and the study makes no reference to them.
- The use of the Decatur Belt is essential to the connectivity of GRPP. Based on the fact that the rail transit concept proposed in the study (which does not include using FRA compliant equipment) would, in fact, eliminate the use of the existing Decatur Belt as planned in the GRPP and, thus would severely impact GRPP and use of the MMPT station.

- Previous studies involving the Beltline have promoted connecting routes for the Beltline which differ from the routes proposed in this report (i.e. MARTA's Inner Core/Beltline - C-Loop Study). The MARTA Study had the Beltline turning east at Dekalb Ave and connecting to MARTA at/near the Inman Park MARTA station where the route would, in some way, cross over the large CSX (Hulsey) Rail Yard and connect to Wylie Street and then continue south towards the Grant Park and West End neighborhoods of Atlanta.
- In the report findings (page 8) it is noted that "the most appropriate mode for transit in this corridor is modern streetcar on rails..." While looking at the unique opportunity for land investment, the regional aspect to transit is not clearly examined. GDOT has proposed to the current owner of the Decatur Belt and to the MARTA Inner Core Study team that the use of FRA-compliant equipment would have distinctive advantages; especially where future line extensions along freight rail corridors are envisioned. Consequently, the Inner Core Study team will be examining FRA compliant technology as part of the Locally Preferred Alternative (LPA). Unfortunately, the NE Beltline Transit Feasibility Study has summarily dismissed the use of Diesel Multiple Units (DMU), which are FRA compliant, as not consistent with the goals for the corridor.
- The study report should include the fact that Norfolk Southern (NS) retained a strip of right-of-way, thirty foot (30') wide, along the entire length of the Decatur Belt for railroad operations and service. NS also retained a short section of forty-five foot (45') wide right-of-way between Buford Highway/State Route 13 and a point just south of Montgomery Ferry Road for double track operations. NS retained this property interest based on GRPP and GDOT's prior discussions with them concerning the intended use of the rail line for rail passenger service.
- The study report doesn't address the problems within the two miles of active track that NS owns and operates north of the Montgomery Ferry Drive overpass. In this section there are some bridge constraints (i.e. I-85, Buford Highway, and CSX) and there are some right-of-way issues around the Armour Rail Yard and NS Mainline tracks (near Lindbergh) that will prove to be formable obstacles. Plus, the Lindbergh Center area has already been heavily developed and a new rail line entering the facility would require a major undertaking.
- The required width for the use of FRA-compliant service is forty-five feet (45', see Attachment). This could be accommodated based upon existing railroad right-of-way and structures in the corridor. It is recommended that the trail right-of-way width be a minimum of 20', the nearest edge of the trail be a minimum of 25' from the centerline of the railroad alignment, and the trail be physically separated (by a barrier) for safety.
- The study notes a constrained right-of-way for the rail and trail combination due to limits at various bridge structures. For this reason it is suggested that the trail not be restricted to the rail corridor and that the trail be woven through the Tax Allocation District (TAD). This would allow a sufficient rail-only corridor, forty-five feet (45') in width, thereby creating a safer environment for rail and trail facilities.
- In the report it is noted that in some locations fences or landscape buffers may be used to more clearly delineate the pedestrian/bike and rail corridors. It is recommended that in areas of landscaping, fencing be installed for safety purposes. Fencing will help ensure pedestrians from stepping out in front of the transit vehicle from a "hidden" location (landscaping).
- The overview of this study report briefly states that a Storage & Maintenance Facility will be a component of the transit project. The document does not display a potential site location of this

facility which will have to hold several tracks and supporting structures. With active railroads on both ends of the corridor, a connection to an outside facility will not be possible. Also, due to the narrow width of the donated property involved, selecting a site along the corridor itself for storage and maintenance will be difficult.

Attached are the typical sections we supplied to Ms. Tapp as well. Although we received confirmation from Mr. Mason that our comments and concerns would be taken into consideration, the DRI application clearly indicates most, if not all, of our comments have been summarily dismissed.

In short, selecting a 30' easement along the Decatur Belt and not providing for a 45' easement that the Department recommends (as required width for the use of FRA-compliant service for double-tracked operations), places a key piece of the Department's commuter and passenger rail plans through the Northeast Atlanta Beltline area in serious jeopardy of ever becoming a reality.

<<Beltline Typical Sections.ppt>>

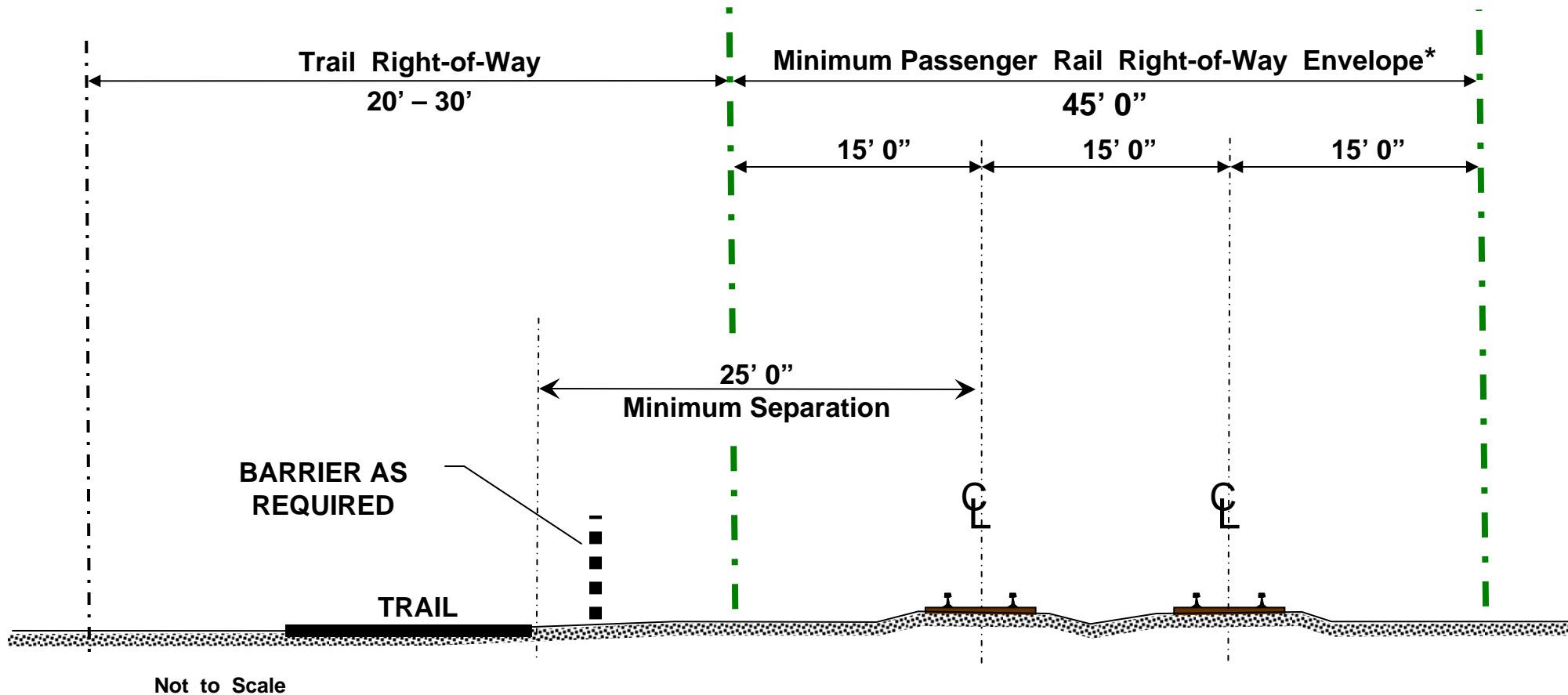
Steve Yost

Rail Program Manager

Office of Intermodal Programs

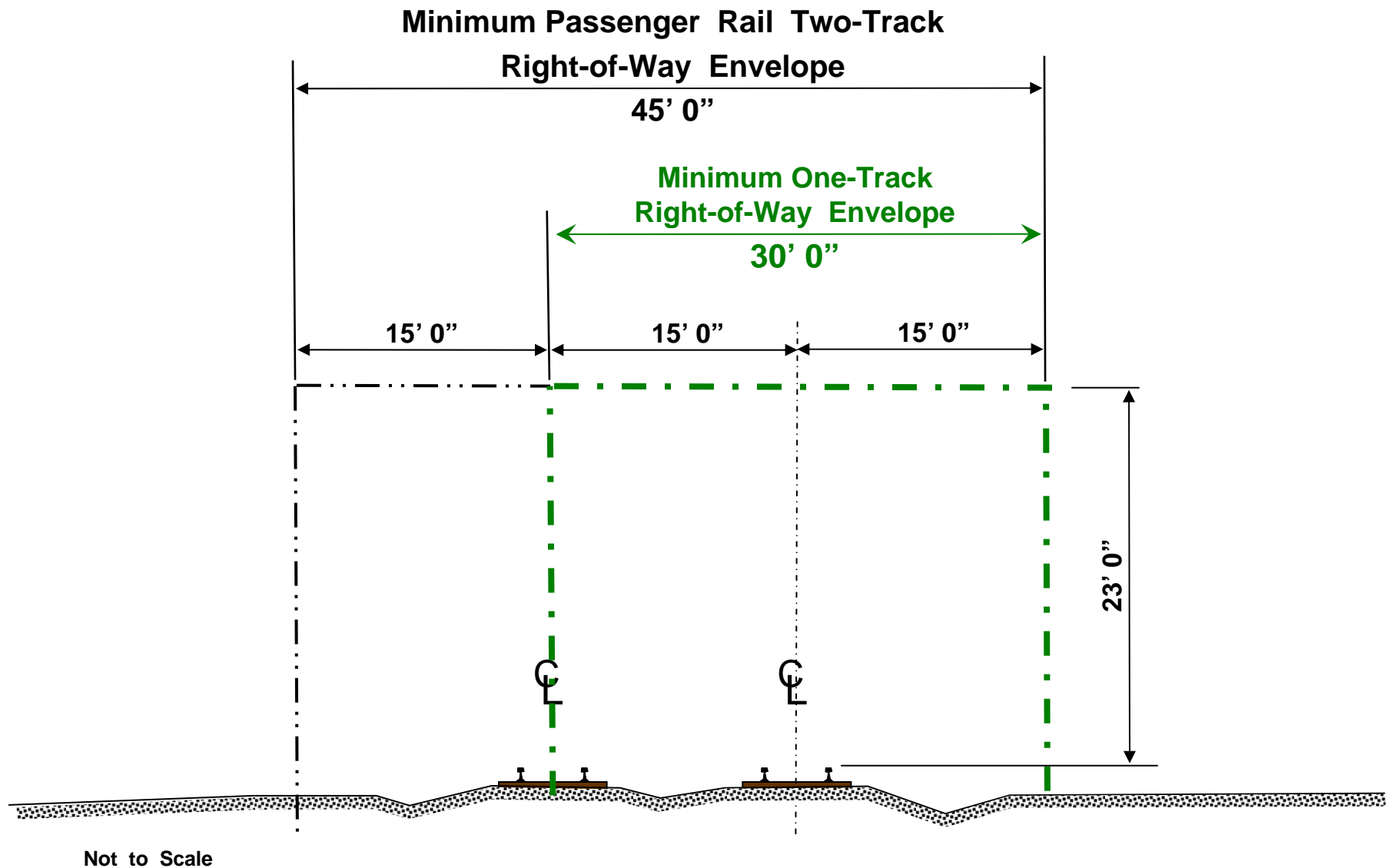
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DECATUR STREET BELTLINE

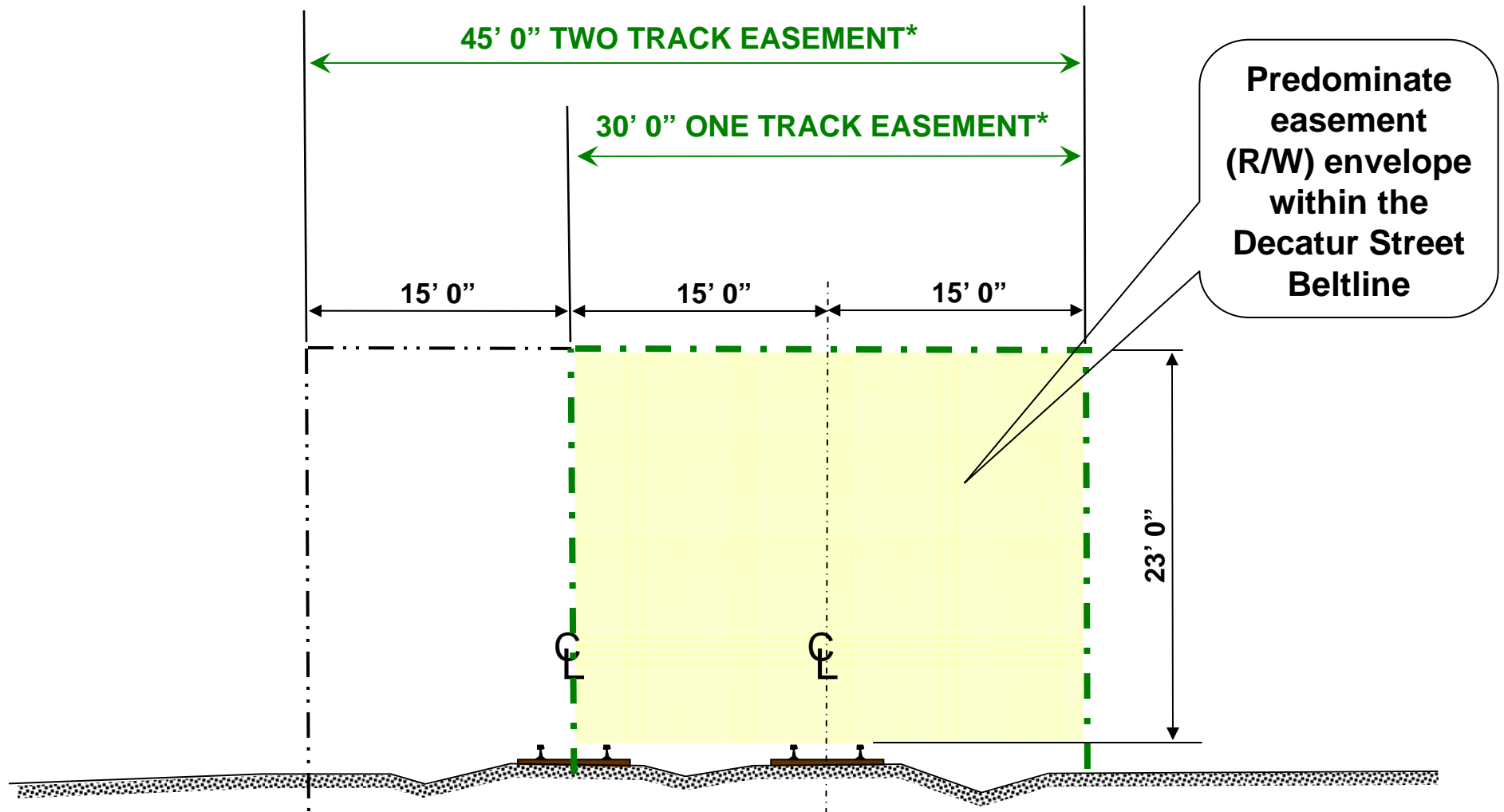


* Additional space required for stations.

DECATUR STREET BELTLINE



RAIL TRANSIT RIGHT OF WAY ENVELOPE



Not to Scale

* Norfolk Southern Decatur Street Beltline.

June 2005



TO: Mike Alexander, Review Coordinator
Atlanta Regional Commission

FROM: Debbie McCown
President/CEO Piedmont Park Conservancy

DATE: June 22, 2006

Thank you for the opportunity to comment on the Northeast Atlanta Beltline Proposal DRI Review. Piedmont Park Conservancy is very supportive of the concept of the beltline and the opportunity to create a linear park, trails, public transit and new parks for our city as envisioned by Alexander Garvin and TPL's proposed "Emerald Necklace". In January 2004 Piedmont Park Conservancy adopted 6 guiding principles for the development of a new master plan for 53 acres of expanded park known as the North Woods. That document states "[We] *Support the proposal to create a light rail Belt Line along the 22-mile rail corridor, which passes through Piedmont Park.*" I have attached this document and ask that you look particularly at items 1(d) and 4(a).

The 2005 master plan addendum approved by the city council in December 2005 clearly shows the beltline and anticipates trolley stops to be located at suggested locations in Piedmont Park.

We realize that development will occur, and in fact is critical to the establishment and success of the beltline. We realize that all of the improvements that the conservancy has made and will make to Piedmont Park only increase the interest in development around Piedmont Park. In September 2005, the Piedmont Park Conservancy Board of Directors adopted a policy on development surrounding the park. I have also attached this document to be included in public comment.

I realize that others have already pointed out and I will simply reiterate that Piedmont Park Historic District is recognized in the National Register of Historic Places.

Vision

The Piedmont Park Conservancy and the City of Atlanta seek to increase usable parkland for passive and active uses in Piedmont Park through the restoration of the North Woods and adjacent areas. In so doing, it is also intended to make the park more vital and accessible to all users, and to make the park more sustainable through sound environmental practices and the generation of revenues to support park maintenance and security. Through proper planning and stewardship, over 50 acres of currently unusable and inaccessible green space can be added to this historic park. This expansion will help to accommodate the park demands of a growing in town population and metro Atlanta residents' desire to use a "central" park.

Strategy 1: Increase the amount of useable public park land in and adjacent to Piedmont Park

This can be done through cooperation with other entities occupying major parcels adjacent to and bounding the north woods area of the park proper, restoring approximately 25 acres of currently unusable and inaccessible parkland and adding approximately 25 acres of new parkland.

- a. Restore the acreage primarily as green space with active and passive areas yet to be determined.
(Julian Bene would like to be noted as disagreeing with this statement. He felt the use of the term "primarily" was not strong enough).
- b. Restore and increase access to currently undeveloped portions of Piedmont Park.
(Approximately 25 acres of the area inside the park boundary are mostly undeveloped and virtually inaccessible. This area also includes the CSO diversion and overflow sites, the current park maintenance facility and the off-leash area of the park)
- c. Explore a partnership with the Atlanta Botanical Garden, to make increased access to portions of area known as "Storza Woods" *(Approximately 1-3 acres)*
- c. Through partnership with the City of Atlanta Department of Watershed Management, develop and increase public access to portions of the Halpern and West sites and restore those portions of Piedmont Park occupied by existing and proposed combined sewer overflow control (CSO) facilities
(Approximately 20 acres. This strategy would fulfill the previous commitment made by the City of Atlanta to surrounding communities that supported the city's CSO control plan to develop and manage these properties as additional parkland and an environmental education site as part of the CSO project)
- d. Through partnership with Norfolk-Southern and/or Georgia DOT, develop and increase public access to portions of the rail right-of-way not reserved for transit. *(Approximately 4 -5 acres of the 200 ft right of way north of the Park Drive Bridge could be dedicated and maintained as new green space. This is in keeping with the current Belt Line Initiative proposed by the President of City Council)*

Strategy 2: Create usable and sustainable public green space of the highest design quality in keeping with the general goals of the adopted Piedmont Park Master Plan

This can be done by respecting and working within the existing characteristics of the natural sub areas found in the North woods area:

- a. Woodland stream environment; preserve and enhance this unique eco-system in an urban area for low impact passive use.
- b. Because of their topography the mostly open and flat areas (including most of the West and Halpern sites) are prime areas that can and should be developed appropriately for a variety of park uses.
(Most of these environments have been altered, some are on fill. Some may even require environmental assessment and possible remediation)
- c. Wooded rolling slopes; protect and develop for low impact woodland use.
(If carefully designed and located, these areas could support a limited number of pathways, picnic areas, and low impact play environments)
- d. Steep wooded slopes; protect and enhance visually but with little or no usable areas.
(Many steep slopes in this area are compromised by unmanaged understory and kudzu and will need extensive restoration.)

Strategy 3: Increase and enhance access into and through the park by pedestrians from multiple points around the park

This can be done by creating multiple new entry points and by eliminating barriers to effective movement through the park:

- a. Create several new pedestrian park entrances in the North Woods area, including at least one primary entrance on both Piedmont Avenue and Monroe Drive.
- b. Create at least two safe primary crossings, at grade or separated, of the rail right-of-way, one at each of the West and Halpern sites.
(The rail line is a serious barrier to east-west circulation throughout this area. More at-grade crossings are desirable, the feasibility of which would be dependant on the ultimate use of the rail and right-of-way. Additional crossings should also be studied south of the Park Drive Bridge)
- c. Create a primary public connection from Piedmont Avenue through the northernmost section of Storza Woods to the main North-South green space of the North Woods area.
(This would include the connection itself and a major new public gateway to the park in the vicinity of Piedmont Avenue and Westminster Drive)
- d. Create at least one primary connection linking the main areas of the North Woods to the historic developed areas of Piedmont Park to the south.
(Explore a possible partnership with the PATH Foundation to develop this connection as part of their region-wide multi-use greenway system. Also seek to relocate the Park's district maintenance facility, possibly to an area behind the CSO facility on the Halpern site, in order to provide a direct link to the multi-purpose complex)

Strategy 4: Increase and enhance access to the park by visitors coming from further than walking distance to the park

This can be done by exploring opportunities for both increased transit access and parking opportunities in and near the park:

- a. Support the proposal to create a light rail Belt Line along the 22-mile rail corridor, which passes through Piedmont Park.
(Support rail stops within the park, safe crossing points, and additional green space development within the right-of-way).
- b. Support additional transit access opportunities to the park;
(Including better signage at MARTA stations, improved MARTA bus access, linkage to the proposed Midtown streetcar system, and possible shuttle access to MARTA heavy rail stations during high volume events in the park).
- c. Explore additional parking opportunities for everyday park users such as small low-impact and/or pervious surface areas at appropriate points around the perimeter of the park, and/or a shared parking facility.
(This facility would serve both the recently developed and currently unmet need for parking for park and Garden users and event patrons, a demand not fully foreseen in the 1995 Master Plan. Studies assessing site impacts including the effect on the environment and the character of the park experience, any financial cost to taxpayers, traffic impacts, shared management options and fee structure are needed to determine the need for and the feasibility of such a facility.)
- d. Explore opportunities to Improve conditions at the Park Drive entry for pedestrians, cyclists, skaters, motorists and neighbors
(This includes improved pedestrian safety, better signage, stronger automobile control, reduction or removal of park service vehicles and possibly automobiles from this street, and restoration of the historic Park Drive Bridge)

Strategy 5: Insure the long-term sustainability of all newly developed areas of the park

This can be done through proper design and adequate funding for on-going maintenance and security:

- a. Create the requirement for a percentage contribution of all capital improvement funds to the Conservancy's Maintenance Endowment for the park.
- b. Generate earned income to support park maintenance and security.
(Such as concessions, moderate parking fees and/or a percentage of user fees and rentals from events taking advantage of new development. Feasibility studies would be conducted to understand impact and Return on Investment.)
- c. Seek participation, collaboration, or support from North Woods partners.
(Such as the Atlanta Botanical Garden, the City's Department of Watershed Management, PATH, and any associated development of portions of the Belt Line right-of-way).

Strategy 6: Seek to provide meaningful park experiences and activities for populations currently underserved by the park.

This can be done by working with various constituent groups to include meaningful park experiences to currently underserved populations such as children, teens, seniors and people with disabilities.

- a. Support the development of play areas and other park opportunities geared towards children.
- b. Ensure that the needs of the disability community and ADA requirements are considered
- c. Discuss options such as bike trails, skateboard park, soccer fields and a natatorium.
- d. Explore areas for teens.
- e. Explore areas for seniors.

PIEDMONT PARK CONSERVANCY

North Woods Stakeholders Committee Members

- Susan Abramson, Midtown Neighborhood Association
- George Barnes, COA Department of Watershed Management
- Julian Bene, NPU F
- Scott Bennett, Atlanta Police Department
- Tony Boatright, ADA Representative
- Harold Dunovant, Atlanta Police Department
- Anne Fauver, Atlanta City Council
- Ken Gillett, Bureau of Parks
- Margaret Gray, Arthur M. Blank Family Foundation
- Nancy Harrison, Ansley Park Civic Association
- Dianne Harnell-Cohen, Commissioner, Bureau of Parks
- John Izard, Piedmont Park Conservancy Board
- Lee Kintzel, Morningside Lenox Park Association
- Randal Lautzenheiser, NPU-E
- David Martin, Atlanta Botanical Garden
- Mary Pat Matheson, Atlanta Botanical Garden
- Judy McCabe-Smith, Virginia Highland Civic Assoc.
- Ed McBrayer, PATH
- Megan Missett, Virginia Highland Morningside Parents Assoc.
- Ceasar Mitchell, Atlanta City Council
- Mary Norwood, Atlanta City Council
- Steve Portnell, Norfolk Southern
- Randal Roark, Piedmont Park Conservancy Board
- Terrilyn Rolle, COA Dept. of Planning & Community Development
- Susan Rutherford, COA Department of Watershed Management
- Barbara Saunders, Arthur M. Blank Family Foundation
- Arnie Silverman, Piedmont Park Conservancy Board
- Jinger Simkins-Stuntz, Midtown Parents Group of MNA
- Myles Smith, Piedmont Park Conservancy Board
- Esther Stokes, Piedmont Park Conservancy Board
- Spencer Tunnell, Piedmont Park Conservancy Board
- Allison Wagner, Cathy Woolard's office
- Cathy Woolard, Atlanta City Council

PPC Staff: Debbie McCown, Chris Nelson, Kara Portnell, Marti Kelefas, Norman McKay

Piedmont Park Conservancy
Statement of Policy on Development Surrounding Piedmont Park
Approved by PPC Board of Directors on September 15, 2005

Our Mission: *To facilitate and contribute to the renewal and preservation of Piedmont Park as a vital, healthy green space and as a cultural and recreational resource that enhances the quality of life for all Atlantans.*

- Within an increasingly urban environment, Piedmont Park performs a vital role as a major green oasis. The Conservancy recognizes the importance of the Park as a regional and civic asset to the citizens of Atlanta.
- The Conservancy believes preserving and enhancing the Park and the Park experience for all Atlantans is critical to its mission and to the City of Atlanta.
- The Conservancy understands that development surrounding Piedmont Park will occur over time.
- The Conservancy has worked with the City, numerous stakeholders and neighbors to develop a Park master plan that anticipates growth of the City, expansion of the Park, and the creation of additional green space, trails, pedestrian access and transit.

With respect to preserving and enhancing the Park experience for all, the Conservancy believes that any development, public or private, surrounding the current or future Park should consider, weigh and apply the following principles:

1. Any development of or improvements to buildings or structures surrounding Piedmont Park should consider height, massing and scale to insure no major interruptions of sunlight to the Park.
2. Any development of or improvements to buildings or structures surrounding the Park should be designed to prevent park users from feeling isolated, unsafe, or uncomfortable within the Park.
3. Any development surrounding the Park should enhance the pedestrian level experience. It is preferable that any buildings or structures provide usable residential or commercial space at the pedestrian level facing the park, and provide visible building facades that are architecturally pleasing and compatible with the Park.
4. Any public or private projects surrounding the Park should be closely coordinated and consistent with the Park master plan.
5. Any public or private projects surrounding the Park should enhance mobility and accessibility to the Park consistent with the Park master plan.
6. Any public or private projects surrounding the Park must understand the fragile nature of the park environment and include protective measures that safeguard the park from negative impact such as storm water runoff, sewage overflows, etc.

Piedmont Park Conservancy is a non profit organization that operates in partnership with the City of Atlanta to preserve and restore Piedmont Park by means of a Memorandum of Understanding adopted by City Council. Founded in 1989, Piedmont Park Conservancy arose from private initiative when a group of civic and corporate leaders launched a rebuilding effort for Piedmont Park through private support. Today the Conservancy, in collaboration with the City, raises funds for and manages park capital improvements, maintenance, security, and programs.

Haley Fleming

From: Mike Alexander
Sent: Tuesday, June 06, 2006 10:13 AM
To: Haley Fleming
Subject: FW: comment on beltline prelim DRI

Mike Alexander
404 463 3302
malexander@atlantaregional.com

-----Original Message-----

From: John Burger [mailto:jburger111@hotmail.com]
Sent: Tuesday, June 06, 2006 9:44 AM
To: Mike Alexander
Subject: RE: comment on beltline prelim DRI

BIGGEST CONCERNS -- MAKES THE PLAN "DEAD IN THE WATER" IN MY MIND

- 1) Plan includes large buildings in Piedmont Park -- against CDP/land use plan, plus the park is on National Register of Historic Places
- 2) Plan only includes one track line in several segments
- 3) Other proposed developments (e.g., at Ansley Square, Amsterdam Walk) do not provide sufficient means for ingress/egress, esp for surrounding streets which already function at low levels

Haley Fleming

From: Cary Aiken [carya@earthlink.net]
Sent: Saturday, June 10, 2006 9:41 AM
To: Mike Alexander
Cc: Haley Fleming; dyoung
Subject: DRI # 1058 - NE BeltLine
Attachments: Fax-May-26-2006-20-21-19-5388.tif; AUDC1...ltLine.pdf

Mr. Alexander,

I am in complete support of the ARC report on the NE BeltLine. It was thoughtful and comprehensive. I also am in support of the additions submitted by Mr. Young of the AUDC to Ms. Fleming regarding historic resources that would be negatively impacted by the current rezoning requests mentioned in the DRI. Of particular importance would be the Piedmont Park listing on the National Register of Historic Places. A copy of that registration is attached along with a copy of Mr. Young's previous statements.

Thank you,

Cary Aiken
1007 Courtenay Drive
Atlanta, GA 30306
404) 815-5880
carya@earthlink.net

6/12/2006

Haley Fleming

From: Elizabeth Coyle [ebcoyle@mindspring.com]
Sent: Sunday, June 11, 2006 11:21 PM
To: Mike Alexander; Haley Fleming
Cc: Steve Cover; Alice Wakefield; Anne Fauver; Anne Fauver; Mary Norwood
Subject: Comment on DRI #1058

Thank you for the opportunity to provide public comment on the review for DRI #1058, Northeast Atlanta Beltline. As a citizen of Atlanta, a resident of impacted neighborhood Virginia Highland, and a representative of the BeltLine Neighbors Coalition, I provide comments in four areas:

1. Consistency of the proposed development with the City of Atlanta Comprehensive Development Plan (CDP) and the BeltLine Redevelopment Plan (BRP).
2. Appropriateness of proposed densities in relation to adjacent single-family neighborhoods.
3. Impact of proposed developments on adjacent historic properties, including Piedmont Park.
4. Analysis of the traffic impact of proposed developments.

1. The developments proposed by Northeast Atlanta Beltline are inconsistent with the City of Atlanta Comprehensive Development Plan, which states, "Support the long-range use of the Southern Railroad right-of-way that exists between Ansley Mall and Ford Factory Square for open space usage. Secure this right-of-way if or when the railroad use is abandoned." As noted on page 4 of the DRI Preliminary Report Summary, parcels 4 and 5* conflict in height and scale with the BeltLine Redevelopment Plan adopted when the tax allocation district (TAD) was approved by the necessary governmental entities. Most notably, Site 2 in Zoning Parcel 1 at Amsterdam Walk and Zoning Parcel 2 at 10th and Monroe are substantially inconsistent with both existing planning documents. From the Preliminary Report (p. 5) Regional Development Plan Policy #12: "Inform and involve the public in planning at regional, local and neighborhood levels." The public was involved in planning reflected in both the CDP and BRP.
2. Proposed densities at Amsterdam Walk and 10th & Monroe are incompatible with adjacent single-family neighborhoods and street capacity. The density of blocks in surrounding neighborhoods is 5 units per acre. The proposed density at Amsterdam Walk is approximately 80 units per acre. The proposed density at 10th and Monroe is approximately 100 units per acre. Neither of these densities is necessary to support transit. According to the Beltline Redevelopment Plan Exhibit C Development Guidelines (p. 19), "Transit-supportive residential densities should generally be between 10 and 15 dwelling units per acre within ¼ mile of the transit corridor." Furthermore, this is the standard used by regional transportation authorities, including ARC and GRTA. The Transportation Demand Management Encyclopedia states that Transit Oriented Development (TOD) can be obtained at 10 units per acre. SmartGrowthPlanning.org gives 9 units per acre for light rail and 12 units per acre for rapid rail. The TAD feasibility study used these standards to calculate financial viability of the BeltLine TAD and these same numbers were used during the redevelopment planning sessions. The total number of units proposed is roughly 10 times the requirement. The Northeast Atlanta Beltline proposed densities are incompatible with Regional Development Plan Policy #6: "Preserve and enhance existing residential neighborhoods." Additionally, these densities are counter to the Overall Framework Plan (Section 6.1) of the BRP: "Require the density of proposed redevelopment to decrease away from the corridor to ensure suitable transition to nearby single-family neighborhoods." The proposed 38 and 39 story towers with 750 residential units at 10th and Monroe are within 150' of single-family homes.
3. The proposed developments are immediately adjacent to, or nearby, numerous properties listed on

the National Register of Historic Places. Doug Young of the Atlanta Urban Design Commission provided a complete listing of potentially impacted historic resources to the Atlanta Regional Commission on June 5. Among this listing is Piedmont Park Historic District, which is immediately adjacent to Sites 1 & 2 of Parcel 1 and Parcel 2. Regional Development Plan Policy #11 states, "Preserve historic resources." A review of the Piedmont Park Master Plan shows incompatibility with the proposed developments, most notably the development at 10th and Monroe. The Piedmont Park Conservancy's Statement of Policy on Development Surrounding Piedmont Park (9/15/05) includes the following principle: "Any development of or improvements to buildings or structures surrounding Piedmont Park should consider height, massing and scale to insure no major interruptions of sunlight to the Park."

4. The traffic impact analysis is based on four assumptions that may not be valid. First, the analysis assumes the low end of impact based on a limited number of studies of high-rise buildings. Compounding a possible flaw in this assumption, the proposed NE Atlanta Beltline high-rise buildings are in the middle of low-density areas. Minimal traffic impact assumptions may be more reasonable for high-rises situated more appropriately in high-density locations. Second, the analysis assumes that a 38% reduction in trips will occur, based on alternative modes and carpool. However, the expected white-collar residents rarely use bus as a transit mode and the distance to rail, office and retail is greater than in Midtown, whose characteristics were used in this study. Third, there is the assumption of a secondary access point to the proposed Amsterdam Walk development off of Monroe Drive north of Amsterdam. The City of Atlanta Department of Watershed Management has made no concession to the viability of this secondary access through and/or near the CSO facility and City of Atlanta parkland. Finally, the analysis assumes that road widening is an improvement. For example, the Northeast Atlanta Beltline proposal is to widen North Avenue at Freedom Parkway (in a single-family residential portion of Poncey-Highland) from 2 lanes to 5. This may move more cars to the proposed development more quickly, but it would have a negative impact on pedestrian and bicycle safety and access to the BeltLine.

I hope the information in the above comments will be considered in preparation of the Final Report for DRI #1058. For the reasons listed above, I believe the proposed Northeast Atlanta Beltline development is not in the Best Interest of the Region.

Sincerely,

Liz Coyle

*The DRI Preliminary Report reference to Parcels 4 & 5 on page 4 may correspond to Sites 4 & 5 referenced on page 10 of the report. It is possible that both references pertain to Site 2 in Zoning Parcel 1 at Amsterdam Walk and Zoning Parcel 2 at 10th and Monroe.