REGIONAL REVIEW FINDING

Atlanta Regional Commission • 40 Courtland Street NE, Atlanta, Georgia 30303 • ph: 404.463.3100 • fax:404.463.3105 • www.atlantaregional.com

DATE: Apr 28 2007

ARC REVIEW CODE: R703291

CEO Vernon Jones TO: ATTN TO: Karmen Swan-White, Planner FROM: Charles Krautler, Director



NOTE: This is digital signature. Original on file

The Atlanta Regional Commission (ARC) has completed regional review of the following Development of Regional Impact (DRI). Below is the ARC finding. The Atlanta Regional Commission reviewed the DRI with regard to conflicts to regional plans, goals, and policies and impacts it might have on the activities, plans, goals, and policies of other local jurisdictions and state, federal, and other agencies. The finding does not address whether the DRI is or is not in the best interest of the local government.

Submitting Local Government: DeKalb County Name of Proposal: Clifton Road Mixed Use Development

Review Type: Development of Regional Impact

Date Opened: Mar 29 2007 Date Closed: Apr 28 2007

FINDING: After reviewing the information submitted for the review, and the comments received from affected agencies, the Atlanta Regional Commission finding is that the DRI is in the best interest of the Region, and therefore, of the State.

Additional Comments: The proposed development meets many of ARC's Regional Development Policies, as well as the Atlanta Region Unified Growth Policy Map. The proposed development is located within an urban neighborhood and is part of a regional center. Urban neighborhoods are defined as distinct areas that are located in an urban area. Urban neighborhoods may have a small commercial component that serves the local area. Regional centers are defined as areas of intense retail, office, and residential uses. These uses can be integrated or separate and have a high density of residential uses.

The proposed development will provided needed residential opportunities for individuals who work along the Clifton Road corridor. As a major area of employment, this area needs additional housing options for individuals working within the area. According to information submitted for the review, the proposed development will designate 20% of the residential units as workforce housing. By providing these additional housing opportunities, along with daily neighborhood retail services, individuals living and working along the corridor will be able to conveniently utilize existing and future alternative transportation options in the immediate area. The developer is also proposing incentives to individuals who live within the new development and work along the Clifton Road corridor. such as parking opportunities within the new development. The developer is also proposing to participate in the Clifton Corridor Transportation Management Association and its activities and programs.

The development is proposing 2,690 parking spaces. For this development, DeKalb County requires 2,640 spaces. Information submitted for the review states that the developer will provide financing incentives to individuals who live within the new development, work along the Clifton Road corridor, and will forgo their parking space on the Emory University or CDC campus. It is strongly recommended that DeKalb County consider innovative methods to reducing the amount of parking required and encourage the developer to provide the minimum amount of parking required to truly encourage alternative modes of transportation within the employment center.

THE FOLLOWING LOCAL GOVERNMENTS AND AGENCIES RECEIVED NOTICE OF THIS REVIEW:						
ARC LAND USE PLANNING	ARC TRANSPORTATION PLANNING	ARC Environmental Planning				
ARC DATA RESEARCH	ARC AGING DIVISION	GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS				
GEORGIA DEPARTMENT OF NATURAL RESOURCES	GEORGIA DEPARTMENT OF TRANSPORTATION	GEORGIA REGIONAL TRANSPORTATION AUTHORITY				
CITY OF ATLANTA	CITY OF ATLANTA SCHOOLS	CLIFTON CORRIDOR TMA				
FULTON COUNTY	Metro Atlanta Rapid Transit Authority	CITY OF DECATUR				
If you have any questions regarding this review, Please call Haley Fleming, Review Coordinator, at (404) 463–3311. This finding will be published to the ARC website.						

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REVIEW REPORT

PROPOSED DEVELOPMENT:

The proposed Clifton Road mixed use development is located on 49.77 acres in DeKalb County. The proposed development plans to develop 21.76 acres of the site that will include 872 residential units, 121,000 square feet of retail space, and 223,000 square feet of hotel space with 200 rooms. The development is proposing three site driveways along Clifton Road.

PROJECT PHASING:

The project is being proposed in one phase with a project build out date for 2011.

GENERAL

Preliminary

Report:

Due:

According to information on the review form or comments received from potentially affected governments:

Is the proposed project consistent with the host-local government's comprehensive plan? If not, identify inconsistencies.

The project site is currently zoned O-I. The proposed zoning for the site is PC-3 (pedestrian community). Information submitted for the review states that the proposed development is consistent with DeKalb County's Future Land Use Plan, which designates the site as institutional, officeprofessional, transportation, communications, and utilities, low-intensity commercial, and public open space.

Is the proposed project consistent with any potentially affected local government's comprehensive plan? If not, identify inconsistencies.

No comments were received identifying inconsistencies with any potentially affected local government's comprehensive plan.

Will the proposed project impact the implementation of any local government's short-term work program? If so, how?

No comments were received concerning impacts to the implementation of any local government's short term work program.

Will the proposed project generate population and/or employment increases in the Region? If yes, what would be the major infrastructure and facilities improvements needed to support the increase?

Yes, the proposed development would increase the need for services in the area for existing and future residents.





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What other major development projects are planned near the proposed project?

The ARC has reviewed other major development projects, known as Area Plan (1984 to1991) or as a DRI (1991 to present), within a mile radius of the proposed project.

Year	Name
2004	The Reserve at Cranbrook
1997	Post Briarcliff
1990	Rock Springs Apartments
1985	Clairmont Place

Will the proposed project displace housing units or community facilities? If yes, identify and give number of units, facilities, etc.

Information submitted for the review states that there are 100 apartments, 102 hotel rooms, and a 20,000 square foot conference center that will all be demolished and replaced with new development.

Will the development cause a loss in jobs? If yes, how many?

No.

Is the proposed development consistent with regional plans and policies?

The proposed development meets many of ARC's Regional Development Policies, as well as the Atlanta Region Unified Growth Policy Map. The proposed development is located within an urban neighborhood and is part of a regional center. Urban neighborhoods are defined as distinct areas that are located in an urban area. Urban neighborhoods may have a small commercial component that serves the local area. Regional centers are defined as areas of intense retail, office, and residential uses. These uses can be integrated or separate and have a high density of residential uses.

Due to the vegetation and topography of the site, on 21 acres is being developed, leaving the majority of the site undeveloped and vegetated.

The proposed development will provided needed residential opportunities for individuals who work along the Clifton Road corridor. As a major area of employment, this area needs additional housing options for individuals working within the area. According to information submitted for the review, the proposed development will designate 20% of the residential units as workforce housing. By providing these additional housing opportunities, along with daily neighborhood retail services, individuals living and working along the corridor will be able to conveniently utilize existing and future alternative transportation options in the immediate area. The developer is also proposing incentives to individuals who live within the new development and work along the Clifton Road corridor, such as parking opportunities within the new development. The developer is also proposing to participate in the Clifton Corridor Transportation Management Association and its activities and programs.



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The development is proposing 2,690 parking spaces. For this development, DeKalb County requires 2,640 spaces. Information submitted for the review states that the developer will provide financing incentives to individuals who live within the new development, work along the Clifton Road corridor, and will forgo their parking space on the Emory University or CDC campus. It is strongly recommended that DeKalb County consider innovative methods to reducing the amount of parking required and encourage the developer to provide the minimum amount of parking required to truly encourage alternative modes of transportation within the employment center.

ARC conducted a Walkable Communities Workshop for the Clifton Corridor in 2005. It is important that the proposed development meets the recommendations in the plan.

The Clifton Community TMA is conducting a transit feasibility study. It is important that the developers of the proposed development work with the CCTMA to ensure that recommended future transit options are not precluded by this development. Also the proposed on-street parking along Clifton Road should be carefully studied due to the traffic volumes along Clifton and site distances due to topography.

FINAL REPORT

Regional Development Plan Policies

- 1. Provide sustainable economic growth in all areas of the region.
- 2. Encourage new homes and jobs within existing developed areas of the region, focusing on principal transportation corridors, the Central Business District, activity centers, and town centers.
- 3. Increase opportunities for mixed use development, transit-oriented development, infill, and redevelopment.
- 4. At strategic regional locations, plan and retail industrial and freight land uses.
- 5. Design transportation infrastructure to protect the context of adjoining development and provide a sense of place appropriate for our communities.
- 6. Promote the reclamation of Brownfield development sites.
- 7. Protect the character and integrity of existing neighborhoods, while also meeting the needs of communities to grow.
- 8. Encourage a variety of homes styles, densities, and price ranges in locations that are accessible to jobs and services to ensure housing for individuals and families of all incomes and age groups.
- 9. Promote new communities that feature greenspace and neighborhood parks, pedestrian scale, support transportation options, and provide an appropriate mix of uses and housing types.
- 10. Promote sustainable and energy efficient development.
- 11. Protect environmentally-sensitive areas including wetlands, floodplains, small water supply watersheds, rivers and stream corridors.
- 12. Increase the amount, quality, and connectivity, and accessibility of greenspace.
- 13. Provide strategies to preserve and enhance historic resources
- 14. Through regional infrastructure planning, limit growth in undeveloped areas of the region
- 15. Assist local governments to adopt growth management strategies that make more efficient use of existing infrastructure.
- 16. Inform and involve the public in planning at regional, local, and neighborhood levels.
- 17. Coordinate local policies and regulations to support Regional Policies
- 18. Encourage the development of state and regional growth management policy.

BEST LAND USE PRACTICES

Practice 1: Keep vehicle miles of travel (VMT) below the area average. Infill developments are the best at accomplishing this. The more remote a development the more self contained it must be to stay below the area average VMT.

Practice 2: Contribute to the area's jobs-housing balance. Strive for a job-housing balance with a three to five mile area around a development site.

Practice 3: Mix land uses at the finest grain the market will bear and include civic uses in the mix. Practice 4: Develop in clusters and keep the clusters small. This will result in more open space preservation.



Practice 5: Place higher-density housing near commercial centers, transit lines and parks. This will enable more walking, biking and transit use.

Practice 6: Phase convenience shopping and recreational opportunities to keep pace with housing. These are valued amenities and translate into less external travel by residents if located conveniently to housing. Practice 7: Make subdivisions into neighborhoods with well-defined centers and edges. This is traditional development.

Practice 8: Reserve school sites and donate them if necessary to attract new schools. This will result in neighborhood schools which provide a more supportive learning environment than larger ones.

Practice 9: Concentrate commercial development in compact centers or districts, rather than letting it spread out in strips.

Practice 10: Make shopping centers and business parks into all-purpose activity centers. Suburban shopping centers and their environs could be improved by mixing uses and designing them with the pedestrian amenities of downtowns.

Practice 11: Tame auto-oriented land uses, or at least separate them from pedestrian-oriented uses. Relegate "big box" stores to areas where they will do the least harm to the community fabric.

BEST TRANSPORTATION PRACTICES

Practice 1: Design the street network with multiple connections and relatively direct routes.

Practice 2: Space through-streets no more than a half mile apart, or the equivalent route density in a curvilinear network.

Practice 3: Use traffic-calming measures liberally. Use short streets, sharp curves, center islands, traffic circles, textured pavements, speed bumps and raised crosswalks.

Practice 4: Keep speeds on local streets down to 20 mph.

Practice 5: Keep speeds on arterials and collectors down to 35 mph (at least inside communities).

Practice 6: Keep all streets as narrow as possible and never more than four traffic lanes wide. Florida suggests access streets 18 feet, subcollectors 26 feet, and collectors from 28 feet to 36 feet depending on lanes and parking. Practice 7: Align streets to give buildings energy-efficient orientations. Allow building sites to benefit from sun angles, natural shading and prevailing breezes.

Practice 8: Avoid using traffic signals wherever possible and always space them for good traffic progression. Practice 9: Provide networks for pedestrians and bicyclists as good as the network for motorists.

Practice 10: Provide pedestrians and bicyclists with shortcuts and alternatives to travel along high-volume streets. Practice 11: Incorporate transit-oriented design features.

Practice 12: Establish TDM programs for local employees. Ridesharing, modified work hours, telecommuting and others.

BEST ENVIRONMENTAL PRACTICES

Practice 1: Use a systems approach to environmental planning. Shift from development orientation to basins or ecosystems planning.

Practice 2: Channel development into areas that are already disturbed.

Practice 3: Preserve patches of high-quality habitat, as large and circular as possible, feathered at the edges and connected by wildlife corridors. Stream corridors offer great potential.

Practice 4: Design around significant wetlands.

Practice 5: Establish upland buffers around all retained wetlands and natural water bodies.

Practice 6: Preserve significant uplands, too.

Practice 7: Restore and enhance ecological functions damaged by prior site activities.

Practice 8: Detain runoff with open, natural drainage systems. The more natural the system the more valuable it will be for wildlife and water quality.

Practice 9: Design man-made lakes and stormwater ponds for maximum environmental value. Recreation, stormwater management, wildlife habitat and others.



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Practice 10: Use reclaimed water and integrated pest management on large landscaped areas. Integrated pest management involves controlling pests by introducing their natural enemies and cultivating disease and insect resistant grasses.

Practice 11: Use and require the use of XeriscapeTM landscaping. XeriscapingTM is water conserving landscape methods and materials.

BEST HOUSING PRACTICES

Practice 1: Offer "life cycle" housing. Providing integrated housing for every part of the "life cycle". Practice 2: Achieve an average net residential density of six to seven units per acre without the appearance of

crowding. Cluster housing to achieve open space.

Practice 3: Use cost-effective site development and construction practices. Small frontages and setbacks; rolled curbs or no curbs; shared driveways.

Practice 4: Design of energy-saving features. Natural shading and solar access.

Practice 5: Supply affordable single-family homes for moderate-income households.

Practice 6: Supply affordable multi-family and accessory housing for low-income households.

Practice 7: Tap government housing programs to broaden and deepen the housing/income mix.

Practice 8: Mix housing to the extent the market will bear.

LOCATION

Where is the proposed project located within the host-local government's boundaries?

The proposed development is located in DeKalb County. The proposed development is bounded by Clifton Road and the CDC on the south, protected forests on the north, Houston Mill Road on the east, and protected forests on the west.

Will the proposed project be located close to the host-local government's boundary with another local government? If yes, identify the other local government.

The proposed development is entirely within DeKalb County.

Will the proposed project be located close to land uses in other jurisdictions that would benefit, or be negatively impacted, by the project? Identify those land uses which would benefit and those which would be negatively affected and describe impacts.

None were determined during the review. The proposed development will be adding housing to the Emory University and CDC employment center.

ECONOMY OF THE REGION

According to information on the review form or comments received from potentially affected governments:

What new taxes will be generated by the proposed project?

Estimated value of the development is \$215 million with an expected \$3.7 million in annual local tax revenues.



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How many short-term jobs will the development generate in the Region?

Short-term jobs will depend upon construction schedule.

Is the regional work force sufficient to fill the demand created by the proposed project?

Yes.

In what ways could the proposed development have a positive or negative impact on existing industry or business in the Region?

None were determined during the review.

NATURAL RESOURCES

Stream Buffers and Watershed Protection

The South Fork of Peachtree Creek and two of its tributaries are shown on the property. The 75-foot buffers required under the DeKalb County's Buffer Ordinance are shown on the all streams on the property. The 25-foot State Erosion and Sedimentation Act buffers are also shown along the streams. Any other state waters on the property are also subject to the State Erosion and Sedimentation Act buffer requirements, which are administered by the Environmental Protection Division of Georgia DNR.

The property is in the Peachtree Creek watershed and therefore is in the Chattahoochee River Basin. Peachtree Creek enters the Chattahoochee downstream of the water intakes in the Atlanta Region, therefore it is not in any water supply watershed in the Atlanta Region

Stormwater / Water Quality

The project is proposed for an already developed area and is located in an urbanized area. Stormwater may be handled by the County's stormwater system. If on-site stormwater detention is provided, the project design should adequately address the impacts of the proposed development on stormwater runoff and downstream water quality. The amount of pollutants that will be produced after construction of the proposed development has been estimated by ARC. These are based on some simplifying assumptions for typical pollutant loading factors (lbs/ac/yr) from typical land uses in the Atlanta Region. The loading factors are based on regional storm water monitoring data from the Atlanta Region with impervious areas based on estimated averages for land uses in the Atlanta Region. If actual impervious percentages are higher or lower than the estimate, the pollutant loads will differ accordingly. A portion of the project is being built over existing impervious surfaces, which will affect the new loading amounts. Given the coverage of the proposed project, commercial was chosen as the use for the developed portion of the property. The following table summarizes the results of the analysis:

Estimated Pounds of Pollutants Per Year

Land Use	Land Area (ac)	Total Phosphorus	Total Nitrogen	BOD	TSS	Zinc	Lead
Commercial	21.76	37.21	378.62	2350.08	21390.08	26.76	4.79



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Forest/Open	30.27	2.42	18.16	272.43	7113.45	0.00	0.00
TOTAL	52.03	39.63	396.79	2622.51	28503.53	26.76	4.79

Total Impervious = 36%

If on-site detention is used, the project should implement stormwater management controls (structural and/or nonstructural) as found in the Georgia Stormwater Management Manual (<u>www.georgiastormwater.com</u>) and meet the stormwater management quantity and quality criteria outlined in the Manual. Where possible, the project should utilize the stormwater better site design concepts included in the Manual.

HISTORIC RESOURCES

Will the proposed project be located near a national register site? If yes, identify site.

None have been identified.

In what ways could the proposed project create impacts that would damage the resource?

Not applicable.

In what ways could the proposed project have a positive influence on efforts to preserve or promote the historic resource?

Not applicable.

INFRASTRUCTURE Transportation

How many site access points will be associated with the proposed development? What are their locations?

Access to the development will be provided by three existing site driveways along Clifton Road.

- Driveway 1 is the northern most driveway, and will be aligned with the Center for Disease Control's main signalized entrance driveway.
- Driveway 2 is the right-in/right-out driveway located between Driveway 1 and Driveway 3.
- Driveway 3 is the signalized driveway located approximately 600 ft south of Driveway 1.

How much traffic (both average daily and peak am/pm) will be generated by the proposed project?

Kimley-Horn and Associates performed the transportation analysis. GRTA and ARC review staff agreed with the methodology and assumptions used in the analysis. The net trip generation is based on the rates published in the 7th edition of the Institute of Transportation Engineers (ITE) Trip Generation report; they are listed in the following table:



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	I and Use			A.M. Peak Hour P.M. P			I. Peak	Hour	24-Hour		
	Lan	Lanu Use		Enter	Exit	2-Way	Enter	Exit	2-Way	2-Way	
	466	Apartments		46	186	232	178	96	274	2952	
	406	Condominiu	ms	27	131	158	127	63	190	2112	
	200 Room Hotel		59	38	97	63	55	118	1416		
	121,103 sq ft Retail Space		107	69	176	341	369	710	7692		
	Reductions		-21	-94	-115	-325	-254	-579	-6192	l	
	TOT	FAL NEW TR	IPS	218	330	548	384	329	713	7980	

What are the existing traffic patterns and volumes on the local, county, state and interstate roads that serve the site?

Incorporating the trip generation results, the transportation consultant distributed the traffic on the current roadway network. An assessment of the existing Level of Service (LOS) and projected LOS based on the trip distribution findings helps to determine the study network. The results of this exercise determined the study network, which has been approved by ARC and GRTA. If analysis of an intersection or roadway results in a substandard LOS "D", then the consultant recommends improvements.

Projected traffic volumes from the Regional Travel Demand Model are compared to the assigned capacity of facilities within the study network. This data is used to calculate a volume to capacity (V/C) ratio. The V/C ratio values that define the LOS thresholds vary depending on factors such as the type of terrain traversed and the percent of the road where passing is prohibited. LOS A is free-flow traffic from 0 to 0.3, LOS B is decreased free-flow from 0.31 to 0.5, LOS C is limited mobility from 0.51 to 0.75, LOS D is restricted mobility from 0.76 to 0.9, LOS E is at or near capacity from 0.91 to 1.00, and LOS F is breakdown flow with a V/C ratio of 1.01 or above. As a V/C ratio reaches 0.8, congestion increases. The V/C ratios for traffic in various network years are presented in the following table. Any facilities that have a V/C ratio of 1.0 or above are considered congested.

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V/C Ratios



For the V/C ratio graphic, the data is based on 2005, 2010 and 2030 A.M./P.M. peak volume data generated from ARC's travel demand model for Mobility 2030, the 2030 RTP and the FY 2006-2011 TIP, approved in March of 2006. The travel demand model incorporates lane addition improvements and updates to the network as appropriate. As the life of the RTP progresses, volume and/or V/C ratio data may appear inconsistent due to (1) effect of implementation of nearby new or expanded facilities or (2) impact of socio-economic data on facility types.



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List the transportation improvements that would affect or be affected by the proposed project.

2006-2011 TIP*

ARC Number	Route	Type of Improvement	Scheduled Completion Year
DK-AR-234	NORTH DECATUR ROAD IMPROVEMENTS	Roadway Operations	2008
DK-AR-BP057	SR 236 (LAVISTA ROAD)	Pedestrian Facility	2011
DK-AR-BP059	SR 42 (BRIARCLIFF ROAD)	Pedestrian Facility	2009

2030 RTP*

ARC Number	Route	Type of Improvement	Scheduled Completion Year
DK-274	SR 236 (LAVISTA ROAD)	Roadway Operations	2012

*The ARC Board adopted the 2030 RTP and FY 2006-2011 TIP on February 22, 2006. USDOT approved on March 30th, 2006.

Summarize the transportation improvements as recommended by consultant in the traffic study for Clifton Road Mixed Use.

According to the findings, there will be some capacity deficiencies as a result of future year **background** traffic. The transportation consultant has made recommendations for improvements to be carried out in order to upgrade the existing level of service.

Briarcliff Road at Lavista Road

- Widen Briarcliff Road to two lanes in each direction from Lavista Road to Clifton Road.
- Taper back to one through-lane in each direction to the north of Lavista Road.
- Convert the existing northbound and southbound right-turn lanes to shared through/right-turn lanes to reduce the total widening.
- Widen Lavista Road to two through lanes in each direction and taper back to one lane in each direction on either side of Briarcliff Road.
- Construct an additional northbound left-turn lane along Briarcliff Road at Lavista Road to accommodate the additional traffic prohibited at Shepherds Lane.

Briarcliff Road at Shepherds Lane

 Construct a median from immediately north of Clifton Road past Shepherds Lane to prohibit all northbound left-turns onto Shepherds Lane as well as eastbound left turns from Shepherds Lane onto Briarcliff Road.

Briarcliff Road at Clifton Road

- Add a second westbound right-turn lane along Clifton Road at Briarcliff Road.
- Convert the inside southbound through lane along Briarcliff Road at Clifton Road to an exclusive southbound left-turn lane.

Briarcliff Road at N. Decatur Road



• Widen to two lanes in each direction along Briarcliff Road. Either taper back to one lane in each direction on either side of N. Decatur Road or extend widening to the north and south to meet existing four-lane sections at Clifton Road to the north and near Chalmette Drive to the south.

Houston Mill Road at Mason Mill Road

- Add a southbound left-turn lane along Houston Mill Road.
- N. Decatur Road at Clifton Road
 - Construct a westbound right-turn lane along N. Decatur Road.

According to the findings, there will be some capacity deficiencies as a result of future year **total** traffic. The transportation consultant has made recommendations for improvements to be carried out in order to upgrade the existing level of service. The recommendations stated in the no-build condition are also applicable to the build condition.

Houston Mill Road at Mason Mill Road

• Add a northbound right-turn lane along Houston Mill Road.

Clifton Road at Houston Mill Road

• Add a second northbound left-turn lane from Clifton Road to Houston Mill Road.

Clifton Road at Driveway 1

- Construct an eastbound left-turn lane on Clifton Road.
- Construct an eastbound right-turn lane on Clifton Road.

Is the site served by transit? If so, describe type and level of service and how it will enhance or be enhanced by the presence of transit? Are there plans to provide or expand transit service in the vicinity of the proposed project?

Transit service is provided to the proposed site by MARTA bus Routes 6 and 245, Emory University's Executive Park and Route A shuttles, and the Clifton Corridor TMA Decatur Shuttle. The Emory University and Clifton Corridor TMA shuttles are free of charge and open to the public.

MARTA bus Route 6 provides service to the proposed site, Monday through Friday, from 5:49 a.m. till 11:37 p.m. with headways between 15 and 20 minutes. Service is provided on Saturday from 5:46 a.m. till 11:46 p.m. with headways of 40 minutes. Service is provided on Sunday from 5:58 a.m. till 11:25 p.m. with headways of 40 minutes.

MARTA express bus Route 245 provides service to the proposed site, Monday through Friday, from 6:55 a.m. till 8:55 a.m. in the morning with headways of 20 minutes. Service is provided in the evening from 2:39 p.m. till 5:57 p.m. with headways between 20 and 30 minutes.

Emory University's Shuttle A provides service to the site, Monday through Friday, from 7:00 a.m. till 8:00 p.m. with headways of 25 minutes.



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Emory University's Executive Park Shuttle provides service to the proposed site, Monday through Friday, from 7:30 a.m. till 11:15 a.m. in the morning and from 4:00 p.m. till 7:45 p.m. in the evening. Headways are between 45 and 50 minutes.

The Clifton Corridor TMA Decatur Shuttle provides service to the proposed site, with a connection to the MARTA Decatur Rail Station, Monday through Friday, from 5:30 a.m. till 8:00 p.m. with headways between 20 and 30 minutes.

What transportation demand management strategies does the developer propose (carpool, flex-time, transit subsidy, etc.)?

None proposed.

The development **PASSES** the ARC's Air Quality Benchmark test.

Air Quality Impacts/Mitigation (based		
on ARC strategies)	Credits	Total
Where Residential is dominant, >15 units/ac	6%	6%
w/in 1/4 mile of Bus Stop (CCT, MARTA,		
Other)	3%	3%
TMA and Parking Management/supply		
restrictions Program	5%	5%
Bike/ped networks connecting to land uses		
within and adjoining the site	4%	4%
Total Calculated ARC Air Quality		
Credits (15 % reduction required)		19%

What are the conclusions of this review? Is the transportation system (existing and planned) capable of accommodating these trips?

According to the impact analysis in the traffic study, seven intersections will operate below the acceptable level of service in the future year background traffic condition prior to implementing the recommended improvements. Implementing the recommended improvements will allow all but one of the identified intersections to operate at the acceptable level of service. In the future year total traffic condition, four intersections will operate below the acceptable level of service prior to implementing the recommended improvements. Implementing the recommended improvements will allow all but one of these intersections to operate at the acceptable level of service. This proposed development is located in a large employment center serviced by a limited roadway network. It is suggested that all recommended improvements be implemented prior to construction completion to minimize the impact of this proposed project on the surrounding roadway network.

INFRASTRUCTURE

Wastewater and Sewage

Wastewater is estimated at 0.24 MGD based on information submitted for the review.



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Which facility will treat wastewater from the project?

R.M Clayton will provide wastewater treatment for the proposed development.

What is the current permitted capacity and average annual flow to this facility?

The capacity of R.M. Clayton Site is listed below:

PERMITTED CAPACITY MMF, MGD 1	DESIGN CAPACITY MMF, MGD	2001 MMF, MGD	2008 MMF, MGD	2008 CAPACITY AVAILABLE +/-, MGD	PLANNED Expansion	REMARKS
No Flow Limit	122	99	120	2	None. Plan before EPD to permit plant at design capacity consistent with draft Chattahoochee River Model.	Existing Consent Decree with the U.S. EPA and Georgia EPD require CSO and SSO improvements throughout the City of Atlanta wastewater system by 2007 and 2014, respectively

MMF: Maximum Monthly Flow. Mgd: million of gallons per day.

¹ Source: Metropolitan North Georgia Water Planning District SHORT-TERM WASTEWATER CAPACITY PLAN, August 2002.

What other major developments will be served by the plant serving this project?

ARC has reviewed a number of major developments that will be served by this plant.

<u>INFRASTRUCTURE</u> Water Supply and Treatment

How much water will the proposed project demand?

Water demand also is estimated at 0.29 MGD based on information submitted for the review.

How will the proposed project's demand for water impact the water supply or treatment facilities of the jurisdiction providing the service?

Information submitted with the review suggests that there is sufficient water supply capacity available for the proposed project.



INFRASTRUCTURE Solid Waste

How much solid waste will be generated by the project? Where will this waste be disposed?

Information submitted with the review 6,750 tons of solid waste per year and the waste will be disposed of in the City of Atlanta.

Will the project create any unusual waste handling or disposal problems?

No.

Are there any provisions for recycling this project's solid waste.

None stated.

INFRASTRUCTURE

Other facilities

According to information gained in the review process, will there be any unusual intergovernmental impacts on:

- Levels of governmental services?
- Administrative facilities?
- Schools?
- Libraries or cultural facilities?
- Fire, police, or EMS?
- Other government facilities?
- Other community services/resources (day care, health care, low income, non-English speaking, elderly, etc.)?

None were determined during the review.

HOUSING

Will the proposed project create a demand for additional housing?

No, the proposed development will add 872 new residential units.

Will the proposed project provide housing opportunities close to existing employment centers?



Yes, once developed, this project will provide housing opportunities for existing employment centers as well as providing opportunities for individuals to live and work within close proximity to one another.

Is there housing accessible to the project in all price ranges demanded?

The site proposed for the development is located in Census Tract 224.02. This tract had a 28.8 percent increase in number of housing units from 2000 to 2006 according to ARC's Population and Housing Report. The report shows that 16 percent, respectively, of the housing units are single-family, compared to 69 percent for the region; thus indicating is a variety of multi-family housing options around the development area.

Is it likely or unlikely that potential employees of the proposed project will be able to find affordable* housing?

Likely, assuming the development is approved with multiple price ranges of housing.

* Defined as 30 percent of the income of a family making 80 percent of the median income of the Region – FY 2000 median income of \$51,649 for family of 4 in Georgia.



Michael J. Mandl Executive Vice President for Finance and Administration

March 14, 2007

Haley Fleming Atlanta Regional Commission 40 Courtland Street, NE Atlanta, Georgia 30303

Dear Haley:

As you know, Emory is planning a mixed-use development on Emory-owned land along Clifton Road (across from the Centers for Disease Control and Prevention) through a joint venture with Cousins Properties, Inc. The site outlined in Emory's DRI application is roughly 50 acres, but we intend to develop only 15 acres, leaving 25 acres of forest to remain undeveloped. The additional 10 acres is already developed.

I write to provide you with additional details related to our pending DRI application for this project. Our intent in building this mixed-use development is to create new housing options not only for Emory employees, but also for employees of the CDC, Children's Healthcare and Druid Hills High School. Ideally, we intend to dedicate approximately 20% of the housing units as "workforce housing" for those employees who make salaries on the lower end of our spectrum, including those unique job classifications that benefit greatly from living closer to their employer, e.g., nurses, research technicians, police and security officers. Further, the retail and other amenities planned for the development will directly benefit the surrounding community. Through smart planning, we will reduce traffic growth in the area by incenting residents to give up their parking permits to qualify to live in the development. Those Emory employees who are given incentives to live in this development would trade in their parking permits assuring their use of the Cliff shuttle system or pedestrian access to Emory (with the goals of taking people off the road at the peak times). The mixed-use project has the additional benefit of providing significant new tax revenue for the County.

To address some of your concerns, I want to assure you that Emory owns all 15.5 acres to be developed. Additionally, our joint venture with Cousins is strong, as we have partnered with them on other major projects, including the Crawford Long Hospital in Midtown Atlanta and the Emory Conference Center and Hotel on campus. Please let me know if there is any other information that you need. I appreciate your support of this project. Thank you.

Sincerely,

Michael J. Mandl

James W. Wagner John Goff John McColl Betty Willis Ron Sauder

cc

Emory University 409 Administration Building Atlanta, Georgia 30322 An equal opportunity, affirmative action university Tel 404.727.6018 Fax 404.727.5592 Email mandl@emory.edu



March 15, 2007

Haley Fleming Atlanta Regional Commission 40 Courtland Street, NE Atlanta, Georgia 30303 The Biltmore Suite 601 817 West Peachtree Street Atlanta, Georgia 30308

Re: Clifton Road Mixed Use DRI - Trip Reduction Methodology

Dear Ms. Fleming:

Per our discussion regarding the reduction of background trips for the Clifton Road Mixed Use DRI, Kimley-Horn is submitting this memo to explain the proposed reduction methodology to be utilized in the DRI.

As stated in the Letter of Understanding dated February 12, 2007, we are assuming a 20% residential mode reduction and a 10% non-residential mode reduction. Due to the nature of the development and its purpose of providing local housing for employees of the Clifton Road corridor (Emory University, Emory Hospital and Children's Health Care of Atlanta, Centers for Disease Control, Druid Hills High School, etc.), we have further assumed that the reduction in trips will be primarily commute trips. Emory will provide financial incentives to its employees living in the development if they forfeit their work parking permit. Because of this proposal and the location of the development, many residents of the development will take transit or walk to their place of employment instead of driving a vehicle. Additionally, due to the location of the hospital along the corridor and the nonstandard work commutes of some of the employees, we have assumed that approximately 10% of the total residential trips reduced will be from work to home in the AM peak and from home to work in the PM peak. The 20% residential mode reduction can be seen in **Table 1**.

The Clifton Road Mixed Use DRI is setting a precedent for development across Atlanta because of its focus to provide substantial nearby housing options for employees of a large employment center. The residents of the mixed use development will now utilize alternate forms of transportation to commute to work, thus removing some existing vehicular trips from the network. In order to adequately capture that removal of trips, we propose an additional reduction in background trips (during the build scenario only) equivalent to the 20% residential mode reduction in new trips. The additional reductions, the directional reverse of those noted in Table 1, are 903 daily trips, 97 AM trips (87 in, 10 out), and 81 PM trips (8 out, 73 in).



We obtained parking inventory data from Emory and located the parking decks with the highest numbers of permits for faculty and staff from the university and hospital (those likely to live in the new development). Using existing count data and the location of the parking decks around Emory's campus, we created a distribution of background vehicular trips likely to be removed from the network upon build-out of the mixed use development. Refer to **Figure 1** for the proposed trip reduction distribution.

The reduction can be found in the analysis spreadsheets for the build scenario (see **Table 2** – intersection spreadsheet for Clifton Road at Houston Mill Road). An additional row has been inserted into the AM and PM intersection spreadsheets called "Background Traffic Adjustment," and the reductions by movement are included in this row. The reductions are taken from the overall build volume (from the background volumes) and not as a component of the newly generated trips.

These additional reductions in background volumes are proposed in conjunction with the approved 20% residential alternative mode reduction as they are appropriate for the type and intent of the development.

Very truly yours,

KIMLEY-HORN AND ASSOCIATES, INC.

Cuistaia C. Pastore

Cristina C. Pastore, EIT Project Manager

Attachments

cc: Gena Wilder, Georgia Regional Transportation Authority

TABLE 1								
Clifton Ro	Clifton Road Mixed Use DRI							
TRIP	GENERATION							
Land Use	Intensity	Daily	AN	1 Peak H	our	PN	1 Peak H	our
		Trips	Total	In	Out	Total	In	Out
Proposed Site Traffic								
220 Apartment	466 d.u.	2,951	232	46	186	274	178	96
230 Residential Condominium/Townhouse	406 d.u.	2,112	158	27	131	190	127	63
310 Hotel	200 rooms	1,417	97	59	38	118	63	55
820 Shopping Center	121,103 s.f.	7,691	176	107	69	710	341	369
					(2)	1.000	-00	-
Gross Trips Desidential Trips		14,171	663 497	1239	424	1,292	709	583
Mixed-Use Reductions		-1 966	40/	0	0	-177	-84	-93
Alternative Mode Reductions*		-903	-97	-10	-87	-81	-73	-8
Adjusted Residential Trips		3,611	390	122	268	324	211	113
5 1		,						
Non-Residential Trips		7,691	176	107	69	710	341	369
Mixed-Use Reductions		-1,966	0	0	0	-177	-93	-84
Alternative Mode Reductions		-573	-18	-11	-7	-53	-25	-29
Pass-By Reductions		-1,752	0	0	0	-163	-82	-41
Adjusted Non-Residential Trips		3,401	158	96	62	317	141	216
New Trips		7,012	548	218	330	641	352	329
Driveway Volumes		8,764	548	218	330	804	434	370

* Residential Alternative Mode Reductions are focused primarily on commute trips, of which 10% are considered reverse direction due to shift changes

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TABLE 2 - INTERSECTION VOLUME DEVELOPMENT

Clifton Road @ Houston Mill Road AM PEAK HOUR

		Clifton	Road			Clifton	Road			Houston	Mill Road			Houston I	Mill Road	
		North	oound			South	bound			Eastl	oound			Westh	ound	
Description	Left	Through	Right	Peds	Left	Through	Right	Peds	Left	Through	Right	Peds	Left	Through	Right	Peds
Observed Volumes	302	837	116	20	142	463	241	5	40	12	31	21	250	202	278	22
School Adjustment																
Annual Growth Rate	3.0%	3.0%	3.0%		3.0%	3.0%	3.0%		3.0%	3.0%	3.0%		3.0%	3.0%	3.0%	
Growth Factor	1.126	1.126	1.126	1.000	1.126	1.126	1.126	1.000	1.126	1.126	1.126	1.000	1.126	1.126	1.126	1.000
Other Proposed Developments																
2011 Background Traffic	340	942	131	20	160	521	271	5	45	14	35	21	281	227	313	22
Project Trips																
Distribution Percentage In		49%							5%						4%	
Distribution Percentage Out					4%	49%	5%									
Residential Trips	0	60	0		11	131	13		6	0	0		0	0	5	
Distribution Percentage In		50%													15%	
Distribution Percentage Out					15%	50%										
Non-Residential Trips	0	48	0		9	31	0		0	0	0		0	0	14	
Background Traffic Adjustment	-14	-1	0		0	-8	-8		0	0	0		-4	-3	0	
Total Project Trips	0	108	0		20	162	13		6	0	0		0	0	19	
2011 Buildout Total	326	1,049	131	20	180	675	276	5	51	14	35	21	277	224	332	22

PM PEAK HOUR

		Clifton	Road			Cliftor	n Road			Houston	Mill Road			Houston	Mill Road	
		North	oound			South	bound			Easth	ound			West	oound	
Description	Left	Through	Right	Peds	Left	Through	Right	Peds	Left	Through	Right	Peds	Left	Through	Right	Peds
Observed Volumes	39	484	309	14	373	753	35	7	174	189	173	44	166	32	72	23
School Adjustment																
Annual Growth Rate	3.0%	3.0%	3.0%		3.0%	3.0%	3.0%		3.0%	3.0%	3.0%		3.0%	3.0%	3.0%	
Growth Factor	1.126	1.126	1.126	1.000	1.126	1.126	1.126	1.000	1.126	1.126	1.126	1.000	1.126	1.126	1.126	1.000
Other Proposed Developments																
2011 Background Traffic	44	545	348	14	420	848	39	7	196	213	195	44	187	36	81	23
Project Trips																
Distribution Percentage In		49%							5%						4%	
Distribution Percentage Out					4%	49%	5%									
Residential Trips	0	103	0		5	55	6		11	0	0		0	0	8	
Distribution Percentage In		50%													15%	
Distribution Percentage Out					15%	50%										
Non-Residential Trips	0	71	0		32	108	0		0	0	0		0	0	21	
Pass-By Trips	0	0	0		0	0	0		0	0	0		0	0	0	
Background Traffic Adjustment	0	-8	-3		0	-1	0		-8	-3	-12		0	0	0	
Total Project Trips	0	174	0		37	163	6		11	0	0		0	0	29	
2011 Buildout Total	44	711	345	14	457	1,010	45	7	199	210	183	44	187	36	110	23

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3/15/2007 17:39

Your DRI ID NUMBER for this submission is: 1320 Use this number when filling out a DRI REVIEW REQUEST. Submitted on: 1/29/2007 9:50:36 AM

DEVELOPMENT OF REGIONAL IMPACT DeKalb County Initial DRI Information (Form1b)

This form is intended for use by local governments within the Metropolitan Region Tier that are also within the jurisdiction of the Georgia Regional Transportation Authority (GRTA). The form is to be completed by the city or county government for submission to your Regional Development Center (RDC), GRTA and DCA. This form provides basic project information that will allow the RDC to determine if the project appears to meet or exceed applicable DRI thresholds. Local governments should refer to both the Rules for the DRI Process 110-12-3 and the DRI Tiers and Thresholds established by DCA.

Local Government Information

Submitting Local Government:	DeKalb County
*Individual completing form and Mailing Address:	Karmen Swan White 330 W. Ponce De Leon Avenue, Suite 500 Decatur GA 30030
Telephone:	404-371-2155
Fax:	404-371-2812
E-mail (only one):	kswhite@co.dekalb.ga.us

*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:	Clifton Road Mixed-Use						
Development Type	Description of Project	Thresholds					
Mixed Use	889 Condominiums 466 Apartments 17 Townhomes 200 Hotel rooms 121000 sf retail	View Thresholds					
Developer / Applicant and Mailing Address:	John Goff (Cousins Properties) 2500 Windy Ridge 30339	lohn Goff (Cousins Properties) 2500 Windy Ridge Parkway Suite 1600 Atlanta, GA 30339					
Telephone:							
Fax:							
Email:	johngoff@cousinsproperties.com						
Name of property owner(s) if different from developer/applicant:	Emory University	Emory University					
Provide Land-Lot-District Number:	15th district; LL 57 & 58						
What are the principal streets or roads providing vehicular access to the site?	Clifton Road						
Provide name of nearest street(s) or intersection:	Clifton Road @ Houston Mill Road	Clifton Road @ Houston Mill Road					
Provide geographic coordinates (latitude/ longitude) of the center of the proposed project (optional):	/						
If available, provide a link to a website providing a general location map of the proposed project (optional). (http://www.mapquest.com or http://www. mapblast.com are helpful sites to use.):							

Is the proposed project entirely located within your local government's jurisdiction?	Y
If yes, how close is the boundary of the nearest other local government?	1.5 miles to City of Atlanta
If no, provide the following information:	
In what additional jurisdictions is the project located?	
In which jurisdiction is the majority of the	Name: (NOTE: This local government is responsible for initiating the DRI review process.)
project located? (give percent of project)	Percent of Project:
Is the current proposal a continuation or expansion of a previous DRI?	Ν
	Name:
(where applicable):	Project ID:
	App #:
The initial action being requested of the local government by the applicant is:	Rezoning
What is the name of the water supplier for this site?	DeKalb County
What is the name of the wastewater treatment supplier for this site?	DeKalb County
Is this project a phase or part of a larger overall project?	Ν
If yes, what percent of the overall project does this project/phase represent?	
Estimated Completion Dates:	This project/phase: Overall project: 2011

Local Government Comprehensive Plan

Is the development consistent with the local government's comprehensive plan, including the Future Land Use Map?	Y
If no, does the local government intend to amend the plan/map to account for this development?	
If amendments are needed, when will the plan/map be amended?	

Service Delivery Strategy Is all local service provision consistent with the countywide Service Delivery Strategy? Y If no, when will required amendments to the countywide Service Delivery Strategy be complete? Y

Land Transportation Improvements Are land transportation or access improvements planned or needed to support the proposed project? Y If yes, how have these improvements been identified: V Included in local government Comprehensive Plan or Short Term Work Program? N Included in other local government plans (e.g. SPLOST/LOST Projects, etc.)? N Included in an official Transportation Improvement Plan (TIP)? N Developer/Applicant has identified needed improvements? N

Other (Please Describe):

To be determined in traffic analysis by Kimley-Horn and Associates, Inc.

Submitted on: 3/23/2007 2:22:12 PM

DEVELOPMENT OF REGIONAL IMPACT DRI Review Initiation Request (Form2a)

Local Government Information		
Submitting Local Government:	DeKalb County	
Individual completing form:	Karmen Swan White	
Telephone:	404-371-2155	
Fax:	404-371-2813	
Email (only one):	kswhite@co.dekalb.ga.su	

Proposed Project Information		
Name of Proposed Project:	Clifton Road Mixed Use DRI	
DRI ID Number:	1320	
Developer/Applicant:	John Goff, Cousins Properties	
Telephone:	404-407-1290	
Fax:	404-407-1291	
Email(s):	johngoff@cousinsproperties.com	

DRI Review Process

Has the RDC identified any additional information required in order to proceed with the official regional review process? (If no, proceed to Economic Impacts.)

If yes, has that additional information been provided to your RDC and, if applicable, GRTA?

If no, the official review process can not start until this additional information is provided.

Economic Impacts

Estimated Value at Build-Out:	\$215 million
Estimated annual local tax revenues (i.e., property tax, sales tax) likely to be generated by the proposed development:	\$3.7 million
Is the regional work force sufficient to fill the demand created by the proposed project?	Y

If the development will displace any existing uses, please describe (using number of units, square feet., etc): 100 apartments, 102 hotel rooms, 20,000 sf conference center

Community Facilities Impacts

Water Supply

Name of water supply provider for this site:	DeKalb County		
What is the estimated water supply demand to be generated by the project, measured in Millions of Gallons Per Day (MGD)?	0.29 MGD		
Is sufficient water supply capacity available to serve the proposed project?	Y		
If no, are there any current plans to expand existing water supply capacity?			
If there are plans to expand the existing water supply capacity, briefly describe below:			
If water line extension is required to serve this project, how much additional line (in miles) will be required?			
Wastewater Disposal			

http://www.georgiaplanning.com/planners/dri/view_form2.asp?id=1320 (1 of 3)3/28/2007 6:55:52 AM

DRI Record

Learne et transformer a environ la construction de	Name of wastewater treatment provider for this site:		ounty
What is the estimated sewage flow to be generated by the project, measured in Million	s of Gallons Per Day (MGD)?	0.24 MGD	,
Is sufficient wastewater treatment capacity available to serve this proposed project?		Y	
If no, are there any current plans to expand existing wastewater treatment capacity?			
If there are plans to expand existing wastewater treatment capacity, briefly describe be	low:		
If sewer line extension is required to serve this project, how much additional line (in mi	es) 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.)		m. peak: 3	84
Has a traffic study been performed to determine whether or not transportation or access improvements will be needed to serve this project?	Has a traffic study been performed to determine whether or not transportation or access improvements will be needed to serve this project?		
If yes, has a copy of the study been provided to the local government?	Y		
If transportation improvements are needed to serve this project, please describe below See DRI Transportation Report	:		
Solid Waste Disposal			
How much solid waste is the project expected to generate annually (in tons)?		6,750 tor	าร
Is sufficient landfill capacity available to serve this proposed project?		Y	
If no, are there any current plans to expand existing landfill capacity?			
If there are plans to expand existing landfill capacity, briefly describe below:			
Will any hazardous waste be generated by the development? If yes, please explain below:		N	
Stormwater Management			
Stormwater Management			
Stormwater Management What percentage of the site is projected to be impervious surface once the proposed d	evelopment has been construc	cted? 3	4.9%
Stormwater Management What percentage of the site is projected to be impervious surface once the proposed d Is the site located in a water supply watershed?	evelopment has been construc	cted? 3	4.9% I
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Stormwater Management What percentage of the site is projected to be impervious surface once the proposed of Is the site located in a water supply watershed? If yes, list the watershed(s) name(s) below: Describe any measures proposed (such as buffers, detention or retention ponds, pervi impacts on stormwater management: Environmental Quality Is the development located within, or likely to affect any of the following: 1. Water supply watersheds? 2. Significant groundwater recharge areas? 3. Wetlands?	evelopment has been construction	cted? 3	4.9%
Stormwater Management What percentage of the site is projected to be impervious surface once the proposed of Is the site located in a water supply watershed? If yes, list the watershed(s) name(s) below: Describe any measures proposed (such as buffers, detention or retention ponds, pervisimpacts on stormwater management: Environmental Quality Is the development located within, or likely to affect any of the following: 1. Water supply watersheds? 2. Significant groundwater recharge areas? 3. Wetlands? 4. Protected mountains?	evelopment has been construction	cted? 3	4.9%
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Stormwater Management What percentage of the site is projected to be impervious surface once the proposed of Is the site located in a water supply watershed? If yes, list the watershed(s) name(s) below: Describe any measures proposed (such as buffers, detention or retention ponds, pervisinpacts on stormwater management: Environmental Quality Is the development located within, or likely to affect any of the following: 1. Water supply watersheds? 2. Significant groundwater recharge areas? 3. Wetlands? 4. Protected mountains? 5. Protected river corridors? If you answered yes to any question 1-5 above, describe how the identified resource(set)	evelopment has been construction ous parking areas) to mitigate	cted? 3	4.9%
Stormwater Management What percentage of the site is projected to be impervious surface once the proposed of Is the site located in a water supply watershed? If yes, list the watershed(s) name(s) below: Describe any measures proposed (such as buffers, detention or retention ponds, pervisimpacts on stormwater management: Environmental Quality Is the development located within, or likely to affect any of the following: 1. Water supply watersheds? 2. Significant groundwater recharge areas? 3. Wetlands? 4. Protected mountains? 5. Protected river corridors? If you answered yes to any question 1-5 above, describe how the identified resource(s) Has the local government implemented environmental regulations consistent with the I for Environmental Planning Criteria?	evelopment has been construct ous parking areas) to mitigate	cted? 3	4.9%

DRI Record

Is the development located within, or likely to affect any of the following:	
1. Floodplains?	N
2. Historic resources?	N
3. Other environmentally sensitive resources?	N
If you answered yes to any question 1-3 above, describe how the identified resource(s) may be affected below:	



