



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: May 2 2007

ARC REVIEW CODE: R704101

TO: Chairman Charles Bannister

ATTN TO: Jeff West, Planning Manager

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: Gwinnett County

Name of Proposal: Arrow Waste, 2855 Humphries Way

Review Type: Development of Regional Impact

Date Opened: Apr 10 2007

Date Closed: May 2 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 is located in an industrial area within an urban neighborhood on the Unified Growth Policy Map. The proposed development is surrounded primarily by other industrial and warehouse uses within the City and the County. It is important to consider compatible uses as the area continues to develop. The Regional Development Policies adopted by the ARC strive to advance sustainable development, protect environmentally sensitive areas, and create a regional network of greenspace. Mass grading and extensive removal of vegetation on the site should be avoided. The proposed development is located within the study area for the Buford Highway Multi Modal Corridor Study recently completed. During a review of the study, the proposed development does not appear to direct conflict with the recommendations set forth in the study.

THE FOLLOWING LOCAL GOVERNMENTS AND AGENCIES RECEIVED NOTICE OF THIS REVIEW:

ARC LAND USE PLANNING
ARC DATA RESEARCH
GEORGIA DEPARTMENT OF NATURAL RESOURCES
CITY OF NORCROSS

ARC TRANSPORTATION PLANNING
ARC AGING DIVISION
GEORGIA DEPARTMENT OF TRANSPORTATION
CITY OF DORAVILLE

ARC ENVIRONMENTAL PLANNING
GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS
GEORGIA REGIONAL TRANSPORTATION AUTHORITY
DEKALB COUNTY

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.

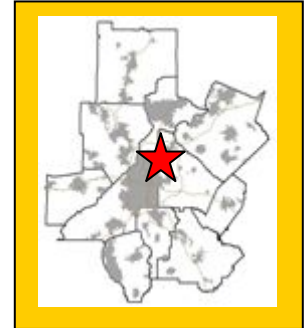
The ARC review website is located at: <http://www.atlantaregional.com/landuse>.

Preliminary Report:	April 10, 2007	DEVELOPMENT OF REGIONAL IMPACT REVIEW REPORT	Project:	Arrow Waste #1361
Final Report Due:	May 10, 2007		Comments Due By:	April 24, 2007

FINAL REPORT SUMMARY

PROPOSED DEVELOPMENT:

The proposed Arrow Waste development is a new construction and demolition debris transfer facility on 2.3 acres in Gwinnett County. The proposed facility will consist of one 15,000 square foot transfer building and one 18,000 square foot accessory office building. The proposed facility is located on Humphries Way with access proposed at one location along Humphries Way.



PROJECT PHASING:

The project is being proposed in one phase with a project build out date 2009.

GENERAL

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 M-1. Proposed zoning for the site is M-2. The developer will also seek a special use permit to develop the C&D facility upon zoning approval. Information submitted for the review states that the proposed development is not consistent with Gwinnett County's Future Land Use Map which designates the area as light industrial.

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?

No, the proposed development would not increase the need for services in the area.

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

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The ARC has reviewed other major development projects, known as Area Plan (1984 to 1991) or as a DRI (1991 to present), within a 1 mile radius of the proposed project.

YEAR NAME

2006 Jones Mill Solid Waste Transfer Station

2003 Global Forum

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

Based on information submitted for the review, the site is currently undeveloped.

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 is located in an industrial area within an urban neighborhood on the Unified Growth Policy Map. The proposed development is surrounded primarily by other industrial and warehouse uses within the City and the County. It is important to consider compatible uses as the area continues to develop. The Regional Development Policies adopted by the ARC strive to advance sustainable development, protect environmentally sensitive areas, and create a regional network of greenspace. Mass grading and extensive removal of vegetation on the site should be avoided.

The proposed development is located within the study area for the Buford Highway Multi Modal Corridor Study recently completed. During a review of the study, the proposed development does not appear to direct conflict with the recommendations set forth in the study.

Comments received from the City of Norcross and attached at the end of this report express concern over whether or not the proposed development is compatible with the goals of the Gwinnett Village CID, which recently expanded into the area. There is also concern as to whether construction debris will fall into the roadway and the surrounding area during transport. The final concern is that the proposed development may be used as a transfer station for garbage other than construction debris. Information submitted for the review and attached at the end of this report states that all loading and unloading of debris will take place entirely inside the building. The building would be equipped with an overhead misting system to minimize dust from the operations. The proposed facility will be private and not open to the general public to transfer solid waste. It is recommended that the applicant work with the Gwinnett Village CID to continue meeting the needs of the CID and the community.

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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.

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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 Xeriscape™ landscaping. Xeriscaping™ 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 at the intersection of Humphries Way and Amwiler Road.

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 the County's jurisdiction. The proposed project is within two miles of the City of Norcross, the City of Doraville, and 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.

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 \$750,000 with an expected \$10,000 in annual local tax revenues.

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

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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

Will the proposed project be located in or near wetlands, groundwater recharge area, water supply watershed, protected river corridor, or other environmentally sensitive area of the Region? If yes, identify those areas.

Watershed Protection and Stream Buffers

The property is in the Peachtree Creek watershed. The USGS coverage for the area shows no streams on or near the property. Any unmapped streams that may be on the property will be subject to Gwinnett County's stream buffer ordinance, which requires a 75-foot buffer along perennial and intermittent streams. Further, any state waters that may be on the property will be subject to the 25-foot Erosion and Sedimentation Act buffers, which are administered by the Environmental Protection Division of Georgia DNR. Any work within these buffers will require a variance from Georgia EPD.

Storm Water / Water Quality

The project should adequately address the impacts of the proposed development on stormwater runoff and downstream water quality. During construction, the project should conform to the relevant state and federal erosion and sedimentation control requirements. After construction, water quality will be impacted due to polluted stormwater runoff. ARC has estimated the amount of pollutants produced after the construction of the entire proposed development, based on the submitted site plans. These estimates are based on some simplifying assumptions for typical pollutant loading factors (lbs/ac/yr). The loading factors are based on the results of regional storm water monitoring data from the Atlanta Region. Actual pollutant loadings will vary based on actual use and the amount of impervious surface in the final project design. The following table summarizes the results of the analysis.

Estimated Pounds of Pollutants Per Year

Land Use:	Land Area (Acres)	Total Phosphorus	Total Nitrogen	BOD	TSS	Zinc	Lead
Heavy Industrial	2.30	3.34	44.25	294.40	1828.50	3.82	0.48
TOTAL	2.30	3.34	44.25	294.40	1828.50	3.82	0.48

Total Percentage Impervious: 80%

In order to address post-construction stormwater runoff quality, the project should implement stormwater management controls (structural and/or nonstructural) as found in the Georgia Stormwater



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Management Manual (www.georgiastormwater.com) 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

Georgia Regional Transportation Authority Review Findings

This DRI proposal is being considered for review under the Georgia Regional Transportation Authority Expedited Review. The site is being proposed for a transfer station within Gwinnett County.

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

GRTA and ARC review staff agreed with the methodology and assumptions used in the analysis. The net trip generation is based on the specific operational parameters being proposed by the developer. Based on information submitted for the review and the proposed use on the site, the vehicle trips generated by the proposed development will be approximately 55 to 60 trips per day.

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

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. As a V/C ratio reaches 0.8, congestion increases. Any facilities that have a V/C ratio of 1.00 or above are considered congested. By the year 2030, Buford Highway is expected to operate at LOS D. Peachtree Industrial Blvd is expected to operate at LOS D by the year 2030.

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What transportation improvements are under construction or planned for the Region that would affect or be affected by the proposed project? What is the status of these improvements (long or short range or other)?

2005-2010 TIP*

ARC Number	Route	Type of Improvement	Scheduled Completion Year
GW-300	US 23 (BUFORD HIGHWAY) ATMS FROM DEKALB COUNTY LINE TO SUGARLOAF PARKWAY	ITS-Smart Corridor	2009

2030 RTP*

ARC Number	Route	Type of Improvement	Scheduled Completion Year
AR-910	SR 13 (BUFORD HIGHWAY) ARTERIAL BUS RAPID TRANSIT (BRT) FROM PLEASANT HILL ROAD IN GWINNETT COUNTY TO MARTA LINDBERGH STATION IN CITY OF ATLANTA	Arterial BRT	2026

**The ARC Board adopted the 2030 RTP and FY 2005-2010 TIP in December 2004. USDOT approved in December 2004.*

Impacts of the truck parking pad: What are the recommended transportation improvements based on the traffic study done by the applicant?

No significant impacts have been estimated because of the development of this project.

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

With only an estimated 55 to 60 vehicle trips accessing the site daily, this development is permissible under the Expedited Review criteria.

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

Given the type of development, none are necessary and the Air Quality Benchmark test will not be used.

INFRASTRUCTURE

Wastewater and Sewage

Based on regional averages, wastewater is estimated at 0.00001 MGD.

Which facility will treat wastewater from the project?

The Crooked Creek facility will provide wastewater treatment for the proposed development.



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

The capacity of the Crooked Creek 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
16	16	15	16	0	None.	Combined discharge to Chattahoochee River with F. Wayne Hill Plant.

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.

INFRASTRUCTURE

Water Supply and Treatment

How much water will the proposed project demand?

Water demand also is estimated at 0.00002 MGD based on regional averages.

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 1.44 tons of solid waste per year and the waste will be disposed of in Gwinnett County.

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

No.

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



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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.

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

No.

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

Given the minimal number of employees, no housing impact analysis is necessary.

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

N/A

* 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.



CITY *of* NORCROSS

65 Lawrenceville Street, Norcross, GA 30071
Phone 770/448-2122 • Fax 770/242-0824
www.norcrossga.net

April 24, 2007

Atlanta Regional Commission
Attention: M. Haley Fleming, AICP
40 Courtland Street, NE
Atlanta, GA 30303

RE: DRI Arrow Waste #1361

Dear Ms. Fleming,

Upon receiving your preliminary report and call for comments, I informed my Mayor and City Council of the proposal. I did receive comments of concern from one Councilman, Mr. Terry Bowie. He has requested that I forward the following concerns to you to be included in the review process:

- He is not supportive of the facility at this location. The City supports the Gwinnett Village CID which as recently expanded into this area. He does not feel this proposal is compatible with the goals of the CID.
- He is concerned that construction debris will fall into the roadway and surrounding area during transport.
- He is concerned that the facility will serve as a transfer station for garbage other than construction debris once the facility is open and operating.

If you have any questions, please feel free to contact me at 770-448-2122 or jpeterson@norcross-ga-gvt.com.

Sincerely,



Jennifer A. Peterson

Mayor Community Development Director

Lillian H. Webb

Councilmembers

Jeff Allen

Terry Bowie

David McLeroy

Keith Shewbert

Charlie Riehm, Mayor Pro Tem

April 4, 2007

Via Hand Delivery

Ms. Robin Cailloux
Georgia Regional Transportation Authority
Marquis One Tower
245 Peachtree Center Avenue, NE, Suite 900
Atlanta, Georgia 30303-1223

Re: Request for Expedited DRI Review for Proposed Solid Waste Transfer Station at 2855 Humphries Way, Land Lot 250, 6th District, Gwinnett County.

Dear Robin:

It was nice to meet you this afternoon at the DRI Pre-Application Meeting for the above-referenced project. When I returned to my office, I reviewed my files and realized that, in my previous letter to you sent on March 12, I only discussed the proposed transfer station in DeKalb County (DRI not yet initiated). However, the two proposed facilities are practically identical. And, as we discussed via email and at the meeting today, the applicant, Arrow, Inc. ("Arrow"), has requested expedited review for both the Gwinnett and DeKalb projects. For your reference, enclosed please find copies of the rezoning and use permit applications submitted to Gwinnett County, and a copy of the letter from the Georgia Environmental Protection Division stating that no air quality permit will be required for the proposed facility. Given its small scale and minimal impacts, we believe the project qualifies for expedited review under the Limited Daily Trip Generation criterion (Section 3-102).

The subject property contains 2.297 acres. Arrow recently applied to Gwinnett County to rezone the Property from M-1 to M-2 and, contingent upon such rezoning, requested a special use permit to develop a construction and demolition ("C & D") debris transfer station. As depicted on the enclosed site plan, Arrow proposes to develop a one-story, 15,000 square foot transfer and a one-story, 1,800 square foot accessory office building. The facility would require two (2) on-site employees.

Approximately 20 to 25 trucks of various sizes would circulate through the Property each day to unload C & D debris (e.g., wood, sheetrock, steel, concrete, other building materials) into a tractor-trailer inside the facility. The trucks would enter the Property from Humphries Way, drive to the back of the transfer facility, enter the facility, untarp, unload the C & D debris inside

the facility and exit the site. About twice a day, the tractor-trailer would leave the Property to transport the debris to the Applicant's private landfill in Walton County. The trucks would access the Property either via I-285 or I-85 (exiting onto Peachtree Industrial Boulevard, Amwiler Road or Pleasantdale Road). The trucks would not cross through any residential areas en route to the Property. The proposed facility would be private and would not be open to the general public to transfer solid waste. The operation would generate a maximum of 55 to 60 vehicle trips per day, including loading/unloading trips, trips to the landfill and employees traveling to and from the site.

The majority of the adjacent and surrounding properties contain industrial uses. To provide screening, Arrow plans to construct an 8-foot screening fence and a landscaped berm along the Humphries Way frontage so that the facility would not be visible from the public right-of-way except when vehicles enter the Property. In addition, Arrow would install landscape strips along the side property lines. As shown on the Site Plan, approximately 0.6 acres of the Property would remain undeveloped to provide detention.

All unloading and loading of debris would take place entirely inside the building. The facility would be equipped with an overhead misting system to minimize any dust from the operations. The facility would not store or transfer any chemical, biological or other hazardous materials. In addition, no processing whatsoever (e.g., no incineration, grinding, screening, etc.) would take place at the facility; the facility would function solely as a storage unit for building materials before they are transported to the landfill.

Please let me know if you have any questions or require any additional information to determine whether this project qualifies for expedited review. Thanks very much.

Yours truly,



Theresa B. Sirois

For Powell Goldstein LLP

Enclosures

Georgia Department of Natural Resources**Environmental Protection Division • Air Protection Branch****4244 International Parkway • Suite 120 • Atlanta • Georgia 30354**

404/363-7000 • Fax: 404/363-7100

Noel Holcomb, Commissioner

Carol A. Couch, Ph.D., Director

MAR 28 2007

Ms. Robin Cailloux
Georgia Regional Transportation Authority
245 Peachtree Center Avenue, Suite 900
Atlanta, GA 30303

Re: Proposed C & D waste transfer stations at:
4039 Bonsal Road, Dekalb County; and
2855 Humphries Way, Gwinnett County
Letter dated March 13, 2007

Dear Ms. Cailloux:

The Air Protection Branch received your notification of two proposed C & D waste transfer stations to be located the addresses listed above. According to the information provided in your correspondence, the proposed transfer stations appear to be exempt from permitting as discussed below:

In accordance with the Georgia Rules for Air Quality Control ("Georgia Rules"), Chapter 391-3-1-.03, section (6) thereof, relating to "Exemptions", the proposed waste transfer stations do not require an Air Quality Permit in accordance with the following exemption(s):

(6) Exemptions. Unless otherwise required by the Director, SIP permits shall not be required for the following source activities. These exemptions may not be used to avoid any emission limitations or standards of the Rules for Air Quality Control Chapter 391-3-1-.02, lower the potential to emit below "major source" thresholds or to avoid any "applicable requirement" (i.e., NSPS, NESHAP, etc.) as defined in 40 CFR Part 70.2.

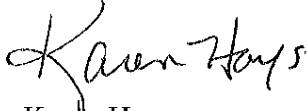
(i) Other

1. Facilities where the combined emissions from all non-exempt source activities [i.e., not listed in 391-3-1-.03(6)(a)-(h)] are below the following for all pollutants:

- (i) 50 tons per year of carbon monoxide;
- (ii) 300 pounds per year of lead total; with a 3.0 pound per day maximum emission;
- (iii) 20 tons per year of particulate matter, PM₁₀, or sulfur dioxide;
- (iv) 20 tons per year of nitrogen oxides or VOCs except in the counties of Cherokee, Clayton, Cobb, Coweta, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Henry, Paulding, or Rockdale, where less than 5 tons per year of nitrogen oxides or VOCs is exempted; and
- (v) 2 tons per year total with a 15 pound per day maximum emission of any single hazardous air pollutant and less than 5 tons per year of any combination of hazardous air pollutants.

Please note that the proposed facilities will be required to obtain an air quality permit if the emissions exceed the thresholds listed above. If you have any questions or comments, please contact me at (404) 363-7096 or via email at karen_hays@dnr.state.ga.us.

Sincerely,

A handwritten signature in black ink that reads "Karen Hays". The signature is written in a cursive, flowing style.

Karen Hays
Air Toxics Unit Manager
Stationary Source Compliance Program

c: Jeff Cown, Land Protection Branch

Your DRI ID NUMBER for this submission is: **1361**
 Use this number when filling out a DRI REVIEW REQUEST.
 Submitted on: 3/22/2007 11:29:07 AM

DEVELOPMENT OF REGIONAL IMPACT

Gwinnett 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:	Gwinnett County
*Individual completing form and Mailing Address:	Jeff West Current Planning Manager 446 West Crogan Street, Suite 150 Lawrenceville, Ga 30045
Telephone:	678-518-6200
Fax:	678-518-6275
E-mail (only one):	Jeffrey.West@gwinnettcountry.com

*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:	Arrow Waste, Inc. (2855 Humphries Way)	
Development Type	Description of Project	Thresholds
Waste Handling	new construction and demolition debris transfer facility	View Thresholds
Developer / Applicant and Mailing Address:	Arrow, Inc. 15 Hopetown Road Mt. Pleasant, SC 29464	
Telephone:	843-884-7884	
Fax:	843-884-4535	
Email:	riptomson@bellsouth.net	
Name of property owner(s) if different from developer/applicant:	Harold L. Humphries	
Provide Land-Lot-District Number:	6th district, land lot 250	
What are the principal streets or roads providing vehicular access to the site?	Humphries Way	
Provide name of nearest street(s) or intersection:	Amwiler Road and Buford Highway	
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 Norcross city limits
If no, provide the following information:	
In what additional jurisdictions is the project located?	
In which jurisdiction is the majority of the project located? (give percent of project)	Name: (NOTE: This local government is responsible for initiating the DRI review process.)
	Percent of Project:
Is the current proposal a continuation or expansion of a previous DRI?	N
If yes, provide the following information (where applicable):	Name:
	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?	Gwinnett County
What is the name of the wastewater treatment supplier for this site?	Gwinnett County
Is this project a phase or part of a larger overall project?	N
If yes, what percent of the overall project does this project/phase represent?	
Estimated Completion Dates:	This project/phase: 2009 Overall project: 2009

Local Government Comprehensive Plan

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

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?	

Land Transportation Improvements

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

Submitted on: 4/4/2007 9:41:58 AM

DEVELOPMENT OF REGIONAL IMPACT DRI Review Initiation Request (Form2a)

Local Government Information

Submitting Local Government:	Gwinnett County
Individual completing form:	Jeff West
Telephone:	678-518-6200
Fax:	678-518-6275
Email (only one):	jeffrey.west@gwinnettcountry.com

Proposed Project Information

Name of Proposed Project:	Arrow Waste
DRI ID Number:	1361
Developer/Applicant:	Arrow, Inc.
Telephone:	843-884-7884
Fax:	843-884-4535
Email(s):	ripthomson@bellsouth.net

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.)	N
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:	\$750,000
Estimated annual local tax revenues (i.e., property tax, sales tax) likely to be generated by the proposed development:	\$10,000
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):	none

Community Facilities Impacts

Water Supply

Name of water supply provider for this site:	Gwinnett County
What is the estimated water supply demand to be generated by the project, measured in Millions of Gallons Per Day (MGD)?	0.00002
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

Name of wastewater treatment provider for this site:	Gwinnett County
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What is the estimated sewage flow to be generated by the project, measured in Millions of Gallons Per Day (MGD)?	0.00001
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 below:	
If sewer line extension is required to serve this project, how much additional line (in miles) will be required?	

Land Transportation

How much traffic volume is expected to be generated by the proposed development, in peak hour vehicle trips per day? (If only an alternative measure of volume is available, please provide.)	25-35 per day total
Has a traffic study been performed to determine whether or not transportation or access improvements will be needed to serve this project?	N
If yes, has a copy of the study been provided to the local government?	
If transportation improvements are needed to serve this project, please describe below: none	

Solid Waste Disposal

How much solid waste is the project expected to generate annually (in tons)?	1.44
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

What percentage of the site is projected to be impervious surface once the proposed development has been constructed?	74.4
Is the site located in a water supply watershed?	N
If yes, list the watershed(s) name(s) below:	
Describe any measures proposed (such as buffers, detention or retention ponds, pervious parking areas) to mitigate the project's impacts on stormwater management: BMP's	

Environmental Quality

Is the development located within, or likely to affect any of the following:	
1. Water supply watersheds?	N
2. Significant groundwater recharge areas?	N
3. Wetlands?	N
4. Protected mountains?	N
5. Protected river corridors?	N
If you answered yes to any question 1-5 above, describe how the identified resource(s) may be affected below:	
Has the local government implemented environmental regulations consistent with the Department of Natural Resources' Rules for Environmental Planning Criteria?	Y

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:

