

Atlanta Regional Commission
200 Northcreek, Suite 300
3715 Northside Parkway
Atlanta, Georgia 30327-2809



Harry West
Director

March 13, 1998

Honorable Bill Campbell, Mayor
City of Atlanta
55 Trinity Avenue, SW--Suite 2400
Atlanta, GA. 30335

RE: Development of Regional Impact Review
Atlantic Steel Redevelopment

Dear Bill:

I am writing just to officially transmit the resolution which the Atlanta Regional Commission adopted on February 25, 1998, concerning the Development of Regional Impact (DRI) review of the Atlantic Steel Redevelopment proposal. As you are aware, while the Commission supported cleaning up and redevelopment of this industrial brownfield to a more appropriate use, they nevertheless found the currently proposed plan is not in the best interest of the State at this time. The concerns about the proposal were the following:

(1) limited access to the site without the proposed construction of a 17th Street Bridge over I-75/85 and additional entrance and exit ramps on and off I-75/85, none of which is included in the Commission's existing or proposed *Atlanta Regional Transportation Plan or Transportation Improvement Program*; and

(2) nitrogen oxide emissions generated by the proposed development which are projected to be approximately 120 tons per year more than the existing emissions resulting from the manufacturing operation and its associated truck and employee trips, therefore exceeding the Commission's 50-ton threshold.

I am enclosing a copy of our review report and copies of comments we received during the review. Please feel free to call me or Beverly Rhea (404-364-2562) if you have any questions concerning the review.

Sincerely,


Harry West
Director

Enclosures

**RESOLUTION BY THE ATLANTA REGIONAL COMMISSION
CONCERNING DEVELOPMENT OF REGIONAL IMPACT REVIEW OF
ATLANTIC STEEL REDEVELOPMENT**

WHEREAS, pursuant to the Georgia Planning Act of 1989 and Georgia Department of Community Affairs Rules for the Review of Developments of Regional Impact (DRI), the Atlanta Regional Commission has reviewed the Atlantic Steel Redevelopment proposal for the 116-acre site located at 1300 Mescaline Street generally bounded on the northwest by Southern Railway, on the east by I-75/85, and on the south by 14th Street to Mescaline Street and 16th Street to I-75/85 in the City of Atlanta; and

WHEREAS, the redevelopment proposal includes 4,000,000 square feet of office space, 1,500,000 square feet of retail/entertainment space, 1,000 hotel rooms, and 2,400 residential units; and

WHEREAS, redevelopment of this site would require closing the existing steel manufacturing operation as well as cleaning up, encapsulating, or otherwise handling of any harmful pollutants found on the site; and

WHEREAS, industrial use such as steel manufacturing is no longer an appropriate land use in central cities; and

WHEREAS, there are some concerns about the specific redevelopment proposal as reviewed, namely

(1) limited access to the site without the proposed construction of a 17th Street Bridge over I-75/85 and additional entrance and exit ramps on and off I-75/85, none of which is included in the Commission's existing or proposed *Atlanta Regional Transportation Plan or Transportation Improvement Program*; and

(2) nitrogen oxide emissions which are projected to be approximately 120 tons per year more than the existing emissions resulting from the manufacturing operation and its associated truck and employee trips, therefore exceeding the Commission's 50-ton threshold;

NOW, THEREFORE, BE IT RESOLVED that the Atlanta Regional Commission supports cleaning up and redevelopment of this industrial brownfield to a more appropriate use but finds the currently proposed plan is not in the best interest of the State at this time due to the above stated concerns.

**ATLANTIC STEEL REDEVELOPMENT
DEVELOPMENT OF REGIONAL IMPACT**

LOCATION

*WEST OF I-75/85
EAST OF NORTHSIDE DRIVE
BOUNDED ON SOUTH GENERALLY BY
14TH & 16TH STREETS
CITY OF ATLANTA
APPROXIMATELY 116 ACRES*

**WOULD REDEVELOP ATLANTIC STEEL MILL SITE INCLUDING
CLEANING UP, ENCAPSULATING, OR OTHERWISE HANDLING ANY
HARMFUL POLLUTANTS ON SITE**

DEVELOPER

ATLANTIS 16TH, LLC

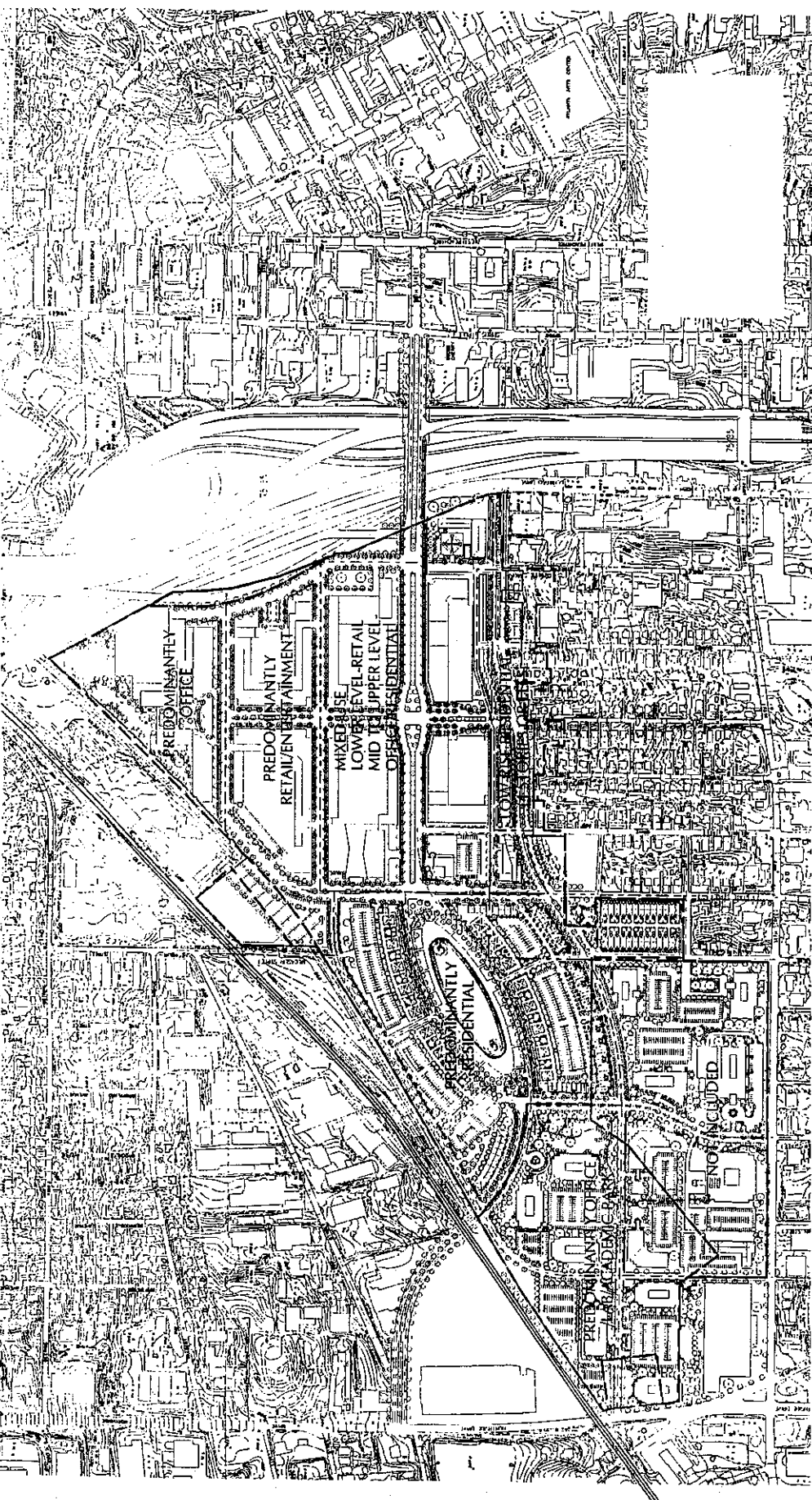
PROPOSED DEVELOPMENT

*4,000,000 SQ.FT. OFFICE
1,500,000 SQ.FT. RETAIL/ENTERTAINMENT
2,400 RESIDENTIAL UNITS
1,000 HOTEL ROOMS
PLAN INCLUDES BRIDGE OVER I-75/85 TO
RECONNECT 17TH STREET,
ADDITIONAL ENTRANCE/EXIT RAMPS
ON & OFF I-75/85, & OVERPASS OR
UNDERPASS AT RR*

POTENTIAL IMPACT

POPULATION	<i>3,600</i>
STUDENTS	<i>600</i>
JOBS	<i>17,000</i>
BUILD OUT VALUE	<i>\$1.1 BILLION</i>
TOTAL WEEKDAY TRIPS	<i>95,945</i>
AIR QUALITY IMPACT	<i>120 TONS NITROGEN OXIDE/YR*</i>
WATER DEMAND	<i>1.5MGD</i>
WASTEWATER GENERATION	<i>1.2 MGD</i>
R.M CLAYTON WWTP	<i>100 MGD PERMIT, 1996 FLOW=79.2 MGD</i>
SOLID WASTE GENERATION	<i>17,000 TONS/YR</i>
CHATTAHOOCHEE LARGE WATER SUPPLY WATERSHED	

**After credits for closing the steel manufacturing operation and its associated truck and employee trips*

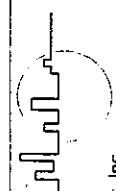


ATLANTIC STEEL Redevelopment

CONCEPTUAL MASTER PLAN

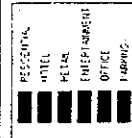
JACOBY DEVELOPMENT INC.

Thompson, Ventulett, Stainback & Associates, Inc.



North

BUILDING USE DIAGRAM



Facility: Redevelopment of Atlantic Steel Site
Preliminary Report: December 22, 1997
Final Report: March 11, 1998

DEVELOPMENTS OF REGIONAL IMPACT

REVIEW REPORT

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.

No. Because of the current use and zoning on the property, the City's CDP shows the property as industrial. The city is considering an amendment to the CDP for the project.

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

No inconsistencies were noted.

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

No impacts were noted.

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?

This development could accommodate between 3,600 and 4,800 residents, including 672 students, and 16,000 jobs according to regional averages. However, the number of students is likely to be under the regional average due to the type of development proposal.

What other major development projects are planned in the vicinity of the proposed project?

ARC has not reviewed any major development on the west side of I-75/85 within this area of the city.

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

Atlantic Steel Mill.

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

Yes. The steel mill is still operational on a small scale and has 300 employees. The redevelopment would result in a very large net increase in jobs.

LOCATION

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

The site proposed for development is bounded generally on the east by I-75/85, on the northwest by Southern Railway and on the south by 16th Street. 33°47'30"/84°24.

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.

No.

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.

No.

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?

Not available until detailed plans are developed.

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

Information submitted indicates 1,000.

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?

The proposed development not only will displace an industrial use that has existed near Home Park and Loring Heights residential uses, but will also expand and help link the mixed use areas of Midtown and Downtown Atlanta. In addition, it will bring more jobs and residences within the central core, reducing vehicle trip length and promoting greater use of public transportation.

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.

The site is in the Chattahoochee River large water supply watershed.

In what ways could the proposed project create impacts that would damage or help to preserve the resource?

The development will have some positive impact on the environment in that it will deal with contaminated soil and groundwater which may exist on this brownfield site. However, see resolution adopted by Atlanta Regional Commission concerning air quality impacts.

HISTORIC RESOURCES

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

No.

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

N/A.

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

N/A.

INFRASTRUCTURE
Transportation

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

Land Use	Sq. Feet Units	Weekday	AM Peak Hour		PM Peak Hour	
			Enter	Exit	Enter	Exit
General Office	4,000,000	33,840	4,272	528	734	3,586
Shopping Center	1,500,000	43,599	504	296	1,990	1,990
High Rise Apartment	700 units	3,017	52	155	141	90
Mid Rise Apartment	1,700 units	6,746	158	352	385	278
Hotel	1,000 rooms	8,743	453	302	374	319
Total		95,945*	5,439	1,632	3,624	6,263

The above trip generation figures were calculated using the Institute of Traffic Engineers (ITE) Trip Generation (5th Edition) manual.

* It is likely that the actual number of average weekday trips for the site would be lower than suggested by ITE because some trips will be pass by trips, some will be captured on site, and some will be served by transit. The Air Quality analysis contains an estimate of the average number of weekday trips reflecting such reductions.

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

The following volumes are based on 1995 GDOT coverage counts from area facilities that will likely provide the primary routes for traveling to the proposed development. 2010 volumes for these facilities were obtained from the ARC transportation model.

Facility	1995			2010		
	Lanes	Volume	V/C Ratio	Lanes	Volume	V/C Ratio
14th St from Northside Dr to Techwood Dr	4	13,300	.3	4	30,700	.7
14th St from Techwood Dr to Piedmont Rd	4	17,900	.4	4	37,700	.9
10th St from Hemphill to Techwood Dr	4	20,300	.5	4	26,300	.6
Northside Dr from 14th St to I-75 NB	4	33,300	.7	4	59,300	1.2
I-75/85 from 10th to 14th St	12	306,900	*	12	215,900	1.3
I-75/85 from 14th St to North Ave	12	334,700	*	12	226,300	1.4

*These V/C ratios are above 1.5, high enough to make the precise ratio insignificant. The traffic counts/ trip assignments reflected in the V/C calculations suggest a level of service of "F" with extended, unpredictable peak hour traffic flows.

This table suggests that I-75/85 operates well beyond capacity and will continue to do so in 2010.

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 those improvements (long or short range or other)?

ARC's Interim Transportation Improvement Program FY 1998 - 2000 does not include any projects in the vicinity of this site.

The Atlanta Region Bicycle and Pedestrian Walkways Plan, 1995 Update includes the following projects, scheduled for construction in FY 1998 or 1999 except where otherwise noted.

- 14th St from P'Tree St to GA Tech. Sidewalks. Complete.
- 10th St from Piedmont Park to GA Tech. Sidewalks. Complete.
- Howell Mill Rd Bikeway/ Bike Lanes from Collier Rd to RD Abernathy.
- 14th St from Howell Mill to Piedmont Park. Bikeway/ Bikelanes.
- Northside Dr from Sampson St to RD Abernathy Blvd. Bikeway/ Bikelanes.

Will the proposed project be located in a rapid transit station area? If yes, how will the proposed project enhance or be enhanced by the rapid transit system?

Adequate pedestrian access, shuttle service, and possibly direct bus transit service would be required to make the site accessible to the Arts Center Transit Station. If adequate access is provided, the site could enhance the rapid transit station with a high density mixed use development with the potential for generating a significant number of transit riders.

Is the site served by transit? If so, describe type and level of service.

The site is currently flanked by MARTA bus routes on 14th Street and Northside Drive. The Arts Center Transit Station is nearby but would be difficult for users of the site to access in the absence of the proposed 17th Street bridge and/ or a multi-vehicle shuttle service with peak headway times of approximately 10 minutes or less.

Are there plans to provide or expand transit service in the vicinity of the proposed project?

MARTA will work with the developer to serve the site with transit as needed.

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

None.

What is the cumulative generation of this and other DRIs or major developments? Is the transportation system (existing and planned) capable of accommodating these trips?

The road network in the vicinity of the site is characterized by significant peak hour traffic congestion. The traffic analysis given above suggests that I-75/85 operates well beyond capacity, a situation that will worsen by 2010. Significantly, as congestion worsens peak traffic hours elongate so that peak hours extend over a longer period each day. Poor traffic signal timing and inadequate signal spacing reduces the performance of area surface streets below what the analysis suggests. The large volume of trips associated with this development proposal could not be absorbed by the area road network in the absence of the Seventeenth Street extension and bridge proposed by the developer. The high cost of such a facility and the current air quality conformity problem in the Atlanta region make the timely construction of these improvements highly uncertain.

Other improvements including signal timing modification, additional turn lanes at intersections, road improvements through the site, and additional traffic signal installations would also be required to manage the traffic impacts of the proposed development. By themselves, these steps would still be insufficient to mitigate the impacts of the proposed development on the area road network: serious efforts at providing alternative transportation facilities would also be required. These include:

- a comprehensive network of bike/pedestrian facilities linking all parts of the site and external facilities to divert internal vehicle trips and support other alternative transportation modes;
- shuttle service and possibly direct bus transit service to make the site accessible to the Arts Center Transit Station;
- site design to encourage transit use; and
- employer or property manager based transportation demand management (TDM) measures including ridematching services, car and van pool subsidies and parking preferences, flex time and telecommuting where appropriate.

AIR QUALITY ANALYSIS

Project Description and Analysis Methodology

The plans for the proposed 116 acre development call for a mix of office, retail, and residential uses. The office component is scheduled to include four-million square feet, with one parcel combining office space with retail and residential uses. Both hi-rise and mid-rise apartments (2,400 units) are proposed for the site. A shopping and entertainment center will be located in the N.W. corner of the tract. The emissions analysis for the proposed development is based on trip generation estimates, calculated as a function of both number of residential units of square footage of retail and office space. These trip estimates are based upon the ITE trip generation manual. The estimated emissions are based on light duty gas vehicles (passenger automobiles) using a mix of peak highway and off peak off-highway conditions assuming 20% cold starts for each.

Results of Analysis

An initial emissions evaluation of the proposed site indicates that the proposed development would contribute direct mobile source NO_x (181.267) emissions to a level that exceeds ARC's standard for such emissions. Current use of the site as an industrial complex results in annual emissions of approximately 61 tons (includes both stationary source and trucking-related emissions). These emissions were deducted from the aforementioned total, due to their potential displacement by the proposed project. Estimates for both hydrocarbons and nitrogen oxides resulting from this development, given credits provided for the existing industrial use, still exceed air quality thresholds established for large-scale projects.

	TONS PER YEAR	TONS PER DAY
Nitrogen Oxides	120.25	.328
Hydrocarbons	85.1	.233

The results of the analysis performed indicate that the proposed development will not meet project-level clean air requirements. Federal Clean Air Standards have prompted the need to evaluate large-scale projects that contribute unnecessarily to the deterioration of the region's

air quality. Large regional projects of this nature are evaluated based upon the extent to which they may (i) create excessive demand for additional trips by single occupant vehicles; (ii) limit opportunities for the use of alternative modes of transportation; and (iii) fail to provide pedestrian connections to complementary land uses, thereby increasing reliance on automobile transport.

INFRASTRUCTURE

Wastewater and Sewage

How much wastewater and sewage will be generated by the proposed project?

Information submitted indicates 1.2 MGD.

Which facility will treat wastewater from the project?

R.M. Clayton Wastewater Treatment Plant.

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

Flow The R.M. Clayton plant has a permitted flow of 100 MGD monthly average. Fifty percent or 50 MGD belongs to DeKalb County under contract. Gwinnett County and Fulton County also send about 4 MGD to each plant. Total average annual flow to the plant was 82.5 MGD in 1995 and 79.2 in 1996. Average monthly flow ranged from 70 MGD to 93 MGD during this two year period. The high flow month occurred in March 1996 during a rainfall event. As indicated by this event, the plant is reaching capacity during wet weather flows.

Monitoring of hook-ups to the sewer system would assure that the plant flow capacity is not exceeded and that DeKalb's share of the plant capacity is not infringed upon. An aggressive infiltration and inflow correction program would reduce high flows to the plant during rainfall events.

Phosphorus Limits The R.M. Clayton plant failed to meet monthly average phosphorus permit limits (0.72 mg/L from Jan. '96 to Jan. '97 and 0.64 mg/L from Feb. '97 to present) in Jan. '96, Mar. '96, Apr. '96, and Feb. '97. The last phosphorus permit limit violation occurred in February of 1997 as a result of non-settling filamentous bacteria and rainfall induced elevated flows at the R.M. Clayton facility. Although the permitted monthly average flow is 100 MGD, the existing final clarifiers of the R.M. Clayton facility are of an old design not particularly well suited for higher flows associated with heavy rainfall events. Further contributions to flow from additional sewer hook-ups combined with the flow contributions associated with rainfall events threaten to periodically exhaust the phosphorus removal capacity of the facility. At present, the City of Atlanta is in the process of completing capital improvement projects, which includes the installation of more efficient final clarifiers to help meet permitted phosphorus limits. Upon completion of this capital improvement project, scheduled for late 1999/early 2000, R.M. Clayton will be better equipped to accommodate increased flows as a result of additional sewer hook-ups and/or contribution from rainfall

events and meet phosphorus permit requirements. The City did meet permit limits in March which was a drier month. It is unlikely that much of this development would be completed prior to 2000.

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

ARC has reviewed numerous developments which would exceed the treatment plant's capacity if all were built as proposed.

INFRASTRUCTURE

Water Supply and Treatment

How much water will the proposed project demand?

Information submitted indicates 1.5 MGD.

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

The City should have sufficient supply and treatment capacity.

INFRASTRUCTURE

Solid Waste

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

Information submitted indicates 17,000 tons per year.

Other than adding to a serious regional solid waste disposal problem, 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 service?
- 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.)?

No.

HOUSING

Will the proposed project create a demand for additional housing?

The proposed development indicates 2,400 residential units.

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

Yes.

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

Yes.

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

Likely.

* Defined as 30 percent of the income of a family making 80 percent of the median income of the Region. 1996 median family income of \$52,100 for Atlanta MSA.