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

Harry West
Director

February 19, 1996

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

RE: Development of Regional Impact (DRI) Review
Post Northside Parkway Mixed Use Development

Dear Mayor Campbell:

As you are aware, the ARC staff has completed the Development of Regional Impact Review of the proposed Post Northside Parkway Mixed Use Development. Our finding is that the proposed project is in the best interest of the State.

Along with our finding we recommend that if the development is approved the City proceed forthwith to resolve the situation concerning sewage treatment referred to in Cobb County's attached comments. Also we would recommend that the City require that the development control the quantity and quality of stormwater runoff to the maximum extent practicable. Finally, we would like to reiterate the importance of the 500-foot natural vegetation buffer along the Chattahoochee River. This buffer was a condition of the previous Metro River Review which included the property in the DRI review. Any land disturbance in the buffer would be a violation of the Metro River certificate even if the buffer area is later donated to the CRNRA or any other entity. Therefore, we recommend a deed restriction to assure permanent protection.

I am enclosing a copy of our complete DRI report and ask that you call us if you have any questions at all about our review. Along with our report, I am sending you copies of the comments we received from Cobb County, CRNRA, and the Riverkeeper during the review. Our notice to potentially affected agencies and their response is a very important part of our review.

We appreciate the opportunity to review this DRI.

Sincerely,

Harry West
Director

Enclosures

cc: Hon. Bill Byrne, Chairman, Cobb County Commission
Mr. Marvin Madry, Supt., CRNRA
Ms. Sally Bethea, Riverkeeper
Mr. Paul Radford, Georgia DCA
Mr. Harold Reheis, Georgia EPD
Ms. Alycen Whiddon, Atlanta Zoning
Ms. Katharine Kelley, Post Apt. Dev.
Mr. Sy Liebmann, NPU A

Facility: Post/Northside Parkway Office & Apartment Development
Preliminary Report: January 19, 1996
Final Report: February 19, 1996

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.

Yes, according to information received from the City with the review.

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

No inconsistencies were identified.

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

No.

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?

According to regional averages, the proposed office and apartments could accommodate 667 jobs and 900 residents including 173 students. Post's experience, however, would indicate substantially fewer students than the regional average - approximately 12, based on Post's experience in Cobb County and the City of Atlanta.

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

The nearest major development ARC reviewed which was approved by the local government was the Riverwood project in Cobb County. The total project included 2.7 million square feet of office space and 250 hotel rooms on 85 acres. ARC has not reviewed any major developments proposed in this vicinity within the City limits of Atlanta.

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

No.

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

No.

LOCATION

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

The site is located in NW Atlanta on the Chattahoochee River between US 41 and I-75 - 33°52'/84°27'.

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 site is directly across the River from Cobb County where a CRNRA site fronts the River.

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.

The land immediately across the River in Cobb County is a CRNRA federal park site. The Post development is required by the earlier Metro River Review on this and contiguous property to preserve a natural vegetation undisturbed buffer for 500 feet back from the River and to restrict all development on the remainder of the site to heights not to exceed 100 feet from the natural ungraded surface. These restrictions were agreed to in part to protect the scenic viewshed of this Palisades section of the River. Also, the total amount of land disturbance and impervious surface allowed on the remainder of the site outside the buffer is limited by the review and certificate.

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?

The development at build out would generate approximately $1.25 million annual property tax according to the developer.

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

750 according to information submitted with the review.

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 office building and the apartments will compete with similar developments that Post and other companies have in the vicinity.

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 subject to the Metropolitan River Protection Act and the earlier certificate issued by the City under the Act. This limits the amount and location of land disturbance and impervious surface as well as establishing the 100-foot height limit and 500-foot natural vegetation buffer. The site also is located in the Chattahoochee Water Supply Watershed. Since this is a large water supply watershed, there are no EPD criteria which will affect this type development. The small area of wetland on the site identified on U.S. Fish & Wildlife Maps and the Chattahoochee River 100-year floodplain are both located in the undisturbed buffer. The site does not appear to be a groundwater recharge area.

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

Impacts on CRNRA

The East Palisades and West Palisades/Paces Mill units of the Chattahoochee River National Recreation Area (CRNRA) directly across the River are a valuable and unique resource enjoyed by over 710,000 people each year. The 695-acre East and West Palisades Units represent a public investment that needs to be protected. The units offer a wide variety of recreational opportunities including hiking and jogging, bird watching, nature photography, wildflower study, picnicking and fishing. Hiking trails wind along the Chattahoochee River and Rottenwood Creek and through forested floodplains, ridges and ravines. In addition, rafting and canoeing in this area, on a stretch of the Chattahoochee River along the CRNRA boundaries, offer an unspoiled, nature experience not found in any other major metropolitan area.

In an area where peaceful, nature experiences are becoming increasingly scarce, the CRNRA area across from the proposed Post development is particularly important. A study commissioned by the National Park Service and entitled "Visitor Perceptions and Reactions to On-Site Impacts" examined several national park areas, including the CRNRA. A survey of CRNRA visitors conducted as part of that study revealed that the most important reason for visiting the CRNRA was "To view the natural scenery."

Therefore, it is vital that the developer carefully protect the 500-foot undisturbed buffer, restrict any development to the agreed 100-foot height limit and carefully site both land disturbance (clearing) and buildings and amenities.

Impacts on the Chattahoochee River

ARC identified the Chattahoochee River as a Regionally Important Resource which is threatened by the impacts of storm water runoff from rapid urban development. In addition, the river downstream of Johnson Ferry Road (the section of the river along which the proposed Post is located) does not meet all standards for its water quality classification under the Clean Water Act. At the Atlanta water supply intake, which is downstream of the proposed development, bacteria, turbidity and temperature levels are higher than upstream at the Gwinnett water supply intake. The State DNR has identified the primary cause of use impairment in the Chattahoochee as nonpoint source pollution from urbanized areas. Therefore, the design, maintenace, and inspection/monitoring of stormwater controls will be very important for protection of the River. Need for appropriate erosion and sedimentation measures during construction are essential. In addition, the amount of pollutants that will be produced after construction of the proposed Post Northside Parkway Mixed Use Development was estimated by ARC. These estimates are based on some simplifying assumptions for typical pollutant loading factors (lbs/ac/year). The loading factors are based on the results of regional storm water monitoring data from the Atlanta Region. The following table summarizes the results of the analysis.

Estimated Pounds of Pollutants Per Year

Land Coverage	Total Phosphorus	Total Nitrogen	BOD	Zinc	Lead
Apartment (81.69ac)	85.8	875.0	5473.2	62.1	11.4
Office (4.58ac)	5.9	78.5	522.1	6.8	.9
Total	**91.7**	**953.5**	**5995.3**	**68.9**	**12.3**

A copy of ARC's Interim Stormwater Quality Management Guidelines is attached for use by the City and the developer in determining how to best control these pollutants.

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	Units or Sq. Feet	Weekday	AM Peak Hours Enter	AM Peak Hours Exit	PM Peak Hours Enter	PM Peak Hours Exit
Multi-Family	600 (units)	3,870	50	250	230	110
Office	200,000	2,370	295	35	55	260
Total		6,240	345	285	285	370

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

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 1994 GDOT coverage counts from area facilities that will likely provide the primary route for traveling to the proposed Post apartments and office development. 2010 volumes for these facilities were obtained from the ARC Regional Transportation Model.

Facility	1994 Number of Lanes	1994 Volume	1994 V/C Ratio	2010 Number of Lanes	Forecast 2010 Volume	2010 V/C Ratio
US 41/Northside Parkway from I-75 to Cobb County Line	4	27,947	0.96	6	48,900	.90
US 41/Cobb Parkway from Fulton County Line to Akers Mill Road	4	26,995	0.93	6/8	48,910	.90*
Kennedy Parkway from I-75 to Cobb Parkway	N/A	N/A	N/A	4	24,840	.85

The table above shows that all facilities in the project vicinity currently operate at their respective carrying capacities. Future volume forecasts indicate that planned improvements to Cobb Parkway and Northside Parkway will allow these road segments to accommodate future traffic growth. Construction of Kennedy Parkway will also help accommodate future traffic growth and provide needed access to I-75.

*V/C Ratio calculated using 6 lanes.

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)?

The ARC's adopted Atlanta Regional Transportation Improvement Program FY 1996 - FY 2001 (TIP) includes the following proposed transportation projects in the vicinity of this development:

AT 12 - Widening the Northside Parkway bridge and approach to the Chattahoochee River from 4 to 6 lanes. The northern limit of the project is 600 feet north of Paces Mill Road. The southern limit of the project is 900 feet south of North Parkway Square, linking the 6-lane project to the short 6-lane section of Northside Parkway just north of Mt. Paran Road. Preliminary engineering and right-of-way acquisition were authorized to begin several years ago; however, construction is currently scheduled beyond the time frame of the TIP (FY 2002 or later).

CO 231 - Widening Cobb Parkway from Paces Mill to Akers Mill Road from 4 to 8 lanes. Preliminary engineering was authorized to begin several years ago, but no other work is currently scheduled until FY 2002 or later.

CO-R 78 - Construction of the Kennedy Interchange on I-75, 4-lane Kennedy Parkway and 2-lane Mill Green Parkway for access to the interchange. Upgrades to access roads in the vicinity include relocation and widening of Akers Mill Road from 2 to 5 lanes. Construction was authorized to begin in FY '96.

The Atlanta Region Bicycle Transportation and Pedestrian Walkways Plan, 1995 Update includes the following proposed greenway trail:

A multi-use greenway trail from Fulton County Airport to the Chattahoochee National Recreation Area with preliminary engineering and right-of-way acquisition scheduled for FY '96 and construction scheduled for FY '97. Funding is anticipated from City of Atlanta Transportation/Park Impact Fees. Note: The proposed Post development would accommodate the section of trail through this area.

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?

No.

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

No. However, Cobb Community Transit serves the nearby Cumberland/Galleria area and MARTA provides bus service to the West Paces Ferry/Northside Parkway area.

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

Not at this time, though project is within the MARTA service area.

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

None stated.

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

Two Major Development Area Plans have been reviewed in this area. The developments are adjacent to each other, north of the proposed Post development, along Cobb Parkway. The trip generation for this development and Cumberland and Riverwood Centers appears below:

Name	Land Use	Units or Sq. Feet	Weekday	AM Peak Hour Enter	AM Peak Hour Exit	PM Peak Hour Enter	PM Peak Hour Exit
Post Properties	Multi-Family	600 (units)	3,870	50	250	230	110
Post Properties	Office	200,000	2,370	295	35	55	260
Cumberland Center	Office	934,000	7,600	965	120	165	800
Cumberland Center	Hotel	310 (rooms)	2,670	130	85	120	105
Riverwood Center	Office	2,700,000	16,950	2,200	275	360	1,750
Riverwood Center	Hotel	250 (rooms)	2,140	100	70	100	85

The table above shows that the three developments, if built as proposed, will add approximately 35,600 additional daily trips to the local road network. Planned road improvements to the north of the project site should offset the developments' traffic impacts along US 41/Cobb Parkway

The City of Atlanta continues to experience infill development in established areas. City officials should work with the developer, ARC and the Georgia Department of Transportation to ensure the integrity and efficient interaction of the Atlanta Region's transportation facilities.

INFRASTRUCTURE

Wastewater and Sewage

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

The developer estimates wastewater generation at .209 MGD.

Which facility will treat wastewater from the project?

R. L. Sutton Wastewater Treatment Plant.

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

It is estimated that this development would discharge an average of .209 MGD to the Cobb Water System's sewer collection system and receive treatment at the Cobb County R. L. Sutton Water reclamation plant.

The R. L. Sutton plant is currently permitted to discharge 40 MGD on a monthly average basis and 50 MGD on a weekly average basis. The annual average was only 30.0 MGD in 1993, and the facility has not exceeded the permitted flow limits since the expansion to 40 MGD was completed. Adequate capacity exists in this plant to accommodate this development.

However, if all developments reviewed in this sewer service area were eventually built as reviewed, flows might approach or exceed 40 MGD. Cobb County is considering expanding the plant in the future, but no firm commitment from EPD has been given. Any future expansion will be subject to the results of EPD's Chattahoochee River Water Quality modeling effort. In addition, Cobb County reports that the City of Atlanta is in noncompliance with the 1972 Sewer Agreement between the two entities due to failure to execute a Pretreatment Agreement and a System Development Fee Agreement. According to Cobb County, such agreements will be necessary prior to full acceptance of the project by Cobb County.

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

ARC has reviewed the following projects in the R. L. Sutton Sewer Service area. However, some of these developments are complete, others are partially complete, and some others are no longer proposed.

Circle 75 Office Park
Home Depot/Post
Oakwood MUD
Emerald Tree Redevelopment
Glenlake Office Park
Powers Ferry Landing, North and West
West Oak MUD
Sandy Plains MUD
Shell Oil Industrial Park
Roswell/285
Roswell Road Apartments
Wildwood Office Park
Northpark Town Center
Post Dunwoody Apartments
Cumberland/Riverwood
Interstate NW
The Bluffs
Radice Office Park

INFRASTRUCTURE
Water Supply and Treatment

How much water will the proposed project demand?

The developer estimates water demand at .240 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 water available to serve the proposed development.

INFRASTRUCTURE
Solid Waste

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

1,132 tons per year. The proposed Post development would contract with private waste haulers who could dispose of waste at any accepting facility in or outside the Region.

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.

While there are no stated plans for recycling on the DRI, it is known that Post apartment developments normally have recycling programs, particularly for newspapers, aluminum cans and bottles.

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 includes 600 units of housing.

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.

May 22, 1995

ARC Storm Water Management Task Force
INTERIM STORM WATER QUALITY MANAGEMENT GUIDELINES

Introduction

The following are suggested interim guidelines for local governments that want to protect and improve water quality by minimizing the potential harmful impacts generated by pollution in storm water runoff from urban land uses. These guidelines are focused on practices to minimize long-term impacts of developed areas on water quality. In general, the objectives of these interim guidelines include minimizing imperviousness, providing areas to capture overland flow of storm water and allow it to infiltrate into the soil, treating other runoff that leaves a developed site and designing sites to protect water quality.

Although many pollutants in storm water runoff must be considered in storm water design, one of the primary pollutants used as a design parameter is total suspended solids, or TSS. The following table is provided as information on post-development characteristics of average annual TSS loads (pounds per acre per year) associated with various land uses and development types. The source of this information is based on storm water samples collected for the Atlanta Region Storm Water Characterization Study and is supplemented with national data for the non-urban land uses.

Land Use	TSS (lbs/ac/yr.)
Forest/Open	235
Agriculture/Pasture/Cropland	327
Large Lot Single Family (>2ac)	355
Low Density S.F. (1-2ac)	447
Low-Medium Density S.F. (0.5-1.0ac)	639
Medium Density S.F. (0.25-0.5ac)	801
Townhouse/Apartment	605
Commercial	983
Office/Light Industrial	708
Heavy Industrial	795

The Atlanta Region Storm Water Management Task Force is working to develop a detailed manual of Best Management Practices (BMPs) for reducing TSS and other pollutants in storm water runoff from urban areas. The Task Force generated the following protection measures as interim recommendations to be used until the BMP manual is completed. This guidance document includes a variety of recommended practices which are presented below as options for developers and engineers to consider in designing controls for storm water runoff quality from developed areas. These practices are options and may be used alone or in combination - selection of appropriate controls will be site-specific.

Practice 1: Minimize Impervious Surface

This option may be most appropriately applied to larger sites. Minimizing the amount of impervious surface on a site allows for more infiltration of storm water into the ground, thereby reducing both pollutants and the runoff from the site. This approach to managing storm water runoff does not require extensive maintenance. Therefore, when possible, limiting impervious surface on a site should be encouraged. This basically involves leaving part of a site undeveloped to achieve lower percentages of impervious surface. It is recommended that impervious surface on a site be limited to the impervious surface equivalent to medium density, single family residential (approximately 1/4 - 1/2 acre average lot sizes) development. This type of development typically has 25% or less impervious surface. If a developer restricts impervious surface to these levels, construction of structural controls for water quality would probably not be necessary. Any development more dense than medium density single family residential should employ structural controls (see Practice 2 below).

The development site should be planned so that open space areas act as a pollutant filter and buffer for storm water flow from the site. Environmentally sensitive portions of a development site such as river and stream corridors and wetlands should be targeted for the undeveloped, "open space" or "greenbelt" areas. Local governments can encourage the concept of "cluster development," which allows higher levels of impervious (over 25%, for example) on portions of a site if sensitive areas are left undeveloped and maintained as undisturbed open space and they function to reduce the pollutant load in storm water runoff. Provisions should be made so that any open space areas are maintained in their natural state. If any development in these areas occurs in the future, the site would have to be re-reviewed, for storm water quality purposes, by the local government.

As a general guideline to local governments, several studies indicate that watershed-wide impervious surface amounts should not exceed 10-25% of the total land area in a water supply watershed.

Practice 2: Structural Controls

If the developer selects storm water management options which involve structural controls, it is important for local governments to require that the developer submit a Storm Water Management Plan as a key component of the Plan of Development. The storm water plan should include the location, construction and design details and all engineering calculations for all storm water quality control measures.

Wet Ponds

This practice recommends that structural controls be designed to control water quality in addition to the quantity controls typically required by local governments. At this time, the preferred approach to achieve water quality goals is construction of wet ponds. However, wet ponds may be more appropriately suited for larger developments or a group of developments. To develop an appropriate wet pond, additional storage provided above the permanent pool, combined with an appropriately designed outlet control structure, could give the necessary control for both storm water quality and quantity. Other structural control methods such as constructed wetlands could be explored as long as they were shown to achieve the desired pollutant removal.

As an example, the following design guidelines typically achieve a TSS reduction of 65%.

- Keep pond shape simple for good circulation.
- Inlets should be widely spaced from the outlets to avoid short-circuiting.
- Length should be three to five times the width.
- At least three, and preferably six to seven feet of permanent pool depth is needed for the majority of the pond.
- An underwater shelf (approximately 6"-12" deep and at least 3' wide) around the perimeter of the pond should be planted with rooted aquatic plant species.
- The pond should be designed with a sediment forebay which is easily accessible for maintenance and periodic cleaning. The forebay should be designed so as to minimize the resuspension of previously deposited sediments. The forebay storage capacity should be about 10% of the permanent pool storage to accommodate sediment accumulations over a 10- to 20-year period.
- The pond surface area should correspond to approximately 1% of the total drainage area. The minimum drainage area is 20-25 acres; the maximum is 100-300 acres depending on the level of imperviousness in the drainage basin.
- For water quality benefits, the pond should provide storage for runoff depths as listed below. The pond volume above the normal pool required for water quality may be calculated by multiplying the runoff depth by the contributing drainage area.

Land Use	Inches of Runoff	
	Sandy Soil	Clayey Soil
Freeways	0.35	0.40
Totally Paved Area	1.10	1.10
Industrial	0.85	0.90
Commercial	0.75	0.85
Schools	0.20	0.40
Low Density Res.	0.10	0.30
Medium Density Res.	0.15	0.35
High Density Res.	0.20	0.40
Developed Parks	0.50	0.60

- Storage for flood control should be provided above the level of storage provided for water quality benefits.
- The ratio of outlet flow rate to pond surface area for each stage value needs to be at the most 0.002 cfs/ft^2 for the water quality portion.

Extended Detention with Wetland Plantings

For smaller sites, with a drainage area less than 20-25 acres, it may be appropriate for the developer to use the option of a detention facility system established to provide water quality improvement through much longer detention times in contact with wetland plantings. Research has shown that storm water impounding areas which capture the first flush of runoff in a wetland setting for several days, in concert with an outlet control system for extending the detention times of larger storms, demonstrate measurable improvements in water quality. As an example, the following general design guidelines typically achieve a TSS reduction of between 45 and 80%.

If this type of system is desired, the pond area should follow the 1% of drainage basin rule presented above. The first flush capture should be at least 1/2 inch runoff from all impervious surfaces. The bottom of the pond should be cultivated with plantings indigenous to local wetlands. The first flush should be held so as to prevent its complete release in less than a 48 hour period. Each pond should provide the forebay sediment storage area already presented, as well as layout to prevent short circuit. Water velocity through the pond should be kept as low as possible with a maximum goal of 1/2 fps. Where possible, the outlet control system should be located adjacent to a public street to allow maximum access.

Maintenance of Structural Controls

If structural storm water controls are not maintained properly, they will provide no benefit. The developer's Storm Water Management Plan should require the developer to submit a detailed, long-term schedule for inspection and maintenance of any structural storm water facilities included. This schedule should be consistent with the maintenance policy of the local government and should describe all maintenance and inspection requirements and persons responsible for performing maintenance and inspection activities. Provisions should be made for the local government to inspect the facilities during and after construction.

Practice 3: Other Controls

Many of the following suggested controls are applicable to all developments. In general, the objectives of the following storm water runoff controls include minimizing imperviousness, providing areas to capture overland flow of storm water and allow it to infiltrate into the soil, reducing sediment flows, and avoiding directly connected impervious surface areas.

Building/Site Design

- Direct roof downspouts away from direct connection with impervious surfaces.
- Use grassed swales/vegetative filter strips whenever feasible for the drainage collection system (eliminate curb and gutter). Because of decreased storm water runoff, a reduction in pollutant loads will also be realized.
- Landscape with terraces rather than aggressive slopes.
- Encourage the use of bioengineering practices to rehabilitate unstable stream channels resulting from impacts of urbanization.
- Protect and maintain natural, undisturbed buffers adjacent to streams.
- Keep development out of wetland and floodplain areas. Encourage incorporating wetlands into landscaping, upgrading wetlands where possible.
- Design and locate buildings, roads, parking and landscaping to conform with the natural terrain and to retain natural features.
- Minimize impervious surface in river and stream corridors.

Erosion and Sediment Controls

- Leave generous buffers or natural areas between bare land areas.
- Regrass/landscape bare soil.
- Check for volume transfer and velocities of water downstream of project to protect downstream areas from increased erosion and to prevent streambank and natural area destruction.
- For controls during construction, refer to the State Erosion and Sediment Control Act and pending State construction permit.

Recommended References

- United States Environmental Protection Agency, January 1993. Guidance Specifying Management Measures for Sources of Nonpoint Pollution in Coastal Waters.

- Schueler, Thomas R., Department of Environmental Programs, Metropolitan Washington Council of Governments, July 1987. Controlling Urban Runoff: A Practical Manual for Planning and Designing Urban BMPs.

- Georgia Soil & Water Conservation Commission, Metro Atlanta Association of Conservation Districts, USDA Soil Conservation Service and Georgia Environmental Protection Division, 1994. Guidelines for Streambank Restoration.

- Pitt, Dr. Robert E. Excerpts from Detention Pond Design to Control Quality and Quantity, University of Alabama, Birmingham Continuing Education Workshop. For more information, contact David Eckhoff, Director of Engineering Professional Development, (205)934-8268.

- Camp Dresser & McKee, prepared for the Atlanta Region Storm Water Task Force, Atlanta Region Storm Water Characterization Study, 1993.

DEVELOPMENTS OF REGIONAL IMPACT
Comments from Affected Parties Form

R E V I S E D

Project I.D: Post/Northside Pkwy
(From Request for Comments Form)

Name of Commenting Organization: Cobb County

Address: 100 Cherokee Street
Marietta, GA 30090-9680

Contact Person: Steve McCullers Telephone Number: 770-419-6338

Do you believe your jurisdiction will be affected by the proposed development? X Yes ____ No

Please describe the effects (positive and/or negative) the proposed project could have on your jurisdiction:

The Cobb County Water System would be responsible for transmission of wastewater flows from the project area along the Chattahoochee River corridor from Highway 41 to the R.L. Sutton WRF; treatment of flows at the WRF; and discharge of treated flows in compliance with NPDES requirements.

At this time, impacted facilities are adequate to accommodate anticipated flows; however, the City of Atlanta is in non-compliance with the 1972 Sewer Agreement between the two entities due to failure to execute a Pretreatment Agreement and a System Development Fee Agreement. Such a agreements will be necessary prior to full acceptance of the project by Cobb County.

(Attach Additional Pages if Necessary)

Form Completed By: Bill Byrne Title: Commission Chairman

Signature: Bill Byrne Date: Feb. 13, 1996

RETURN TO: ATLANTA REGIONAL COMMISSION
3715 Northside Parkway
200 Northcreek, Suite 300
Atlanta, Ga. 30327
ATTENTION: REVIEW OFFICE

FAX NO. 404-364-2599

DCA/OCP 10/7/91

United States Department of the Interior

NATIONAL PARK SERVICE
CHATTAHOOCHEE RIVER NATIONAL RECREATION AREA
1978 Island Ford Parkway
Atlanta, GA 30350-3400

IN REPLY REFER TO:

L3215(CHAT)

FEB 01 1996

Ms. Beverly Rhea
Review Coordinator
Atlanta Regional Commission
3715 Northside Parkway
200 Northcreek, Suite 300
Atlanta, Georgia 30335

Dear Ms. Rhea:

In response to your request for comments on the Development of Regional Impact Review, Post Northside Parkway Development, we offer the following.

Undeveloped properties within the I-75 corridor have received a great amount of attention within the last several years. Companies wishing to place commercial and residential development within the corridor have been proposed. These developments pose direct threats upon water quality by reducing the river's natural buffer area and also threaten the loss of the pristine viewshed of the Chattahoochee River.

We applaud the developer for setting aside a 500' buffer between the river and any new construction. This proposed project could have a major effect on the natural river's viewshed. We would like to recommend that any structure be kept to a low profile, and that the proposed buffer be maintained in a natural vegetation state, with no removal of vegetation and designated as a no build zone, except for a semi-pervious trail not wider than 4 feet, designed with proper erosion control to prevent direct runoff into the river. This trail would serve as access to the river. Possibly, the developer may consider setting this section aside for a conservation easement.

We would also like to make a recommendation that this developer strictly adheres to the Georgia's Erosion and Sedimentation Control Laws and that proper surface runoff control is designed into this development to prevent any further loading/pollution to the Chattahoochee River.

Establishing a larger natural buffer as suggested would safe guard the rapid loss of our pristine river corridor and protect the river's water quality from non-point pollution by providing a much larger natural filtration area.

Chattahoochee River National Recreation Area does not specifically oppose this development. However, we remain concerned over difficult-to-measure accumulative affect of rapid continual development in the river corridor.

Thank you for the opportunity to comment. If we can be of any further assistance, please contact me at 770-399-8070.

Sincerely,

Marvin Madry

Marvin Madry
Superintendent

UPPER CHATTAHOOCHEE
RIVERKEEPER

Your River Your Future

February 9, 1996

Ms. Beverly Rhea
Review Coordinator
Atlanta Regional Commission
200 Northcreek Suite 300
3715 Northside Parkway
Atlanta, Georgia 30327-2809

RE: DRI - Post Northside Parkway Development

Dear Beverly:

Pursuant to your letter of January 23, 1996, regarding the above proposed development, we are providing the following comments for your consideration. Riverkeeper is a non-profit environmental advocacy organization whose mission is to protect the Chattahoochee River, its tributaries and watershed.

Riverkeeper and its members are very familiar with the site which is proposed for development. We have met with representatives of the applicant, Post Apartment Development, to discuss the proposed multi-family and office plans (600 apartment units and 200,000 square feet of office space). As ARC has noted in its Review Report, this 86 acre tract lies within the heart of the Chattahoochee River National Recreational Area, a "valuable and unique resource enjoyed by over 710,000 people each year". The proposed development site contains steep slopes and uneven terrain, much of which has been designated vulnerability categories "E" and "F" according to the Chattahoochee River Corridor Plan.

In order to receive category upgrades on clearing and impervious surface allowances, an earlier Metro River Review required that a natural undisturbed buffer of 500' back from the River be preserved and that all development on the remainder of the site be held to a height limitation of 100'. The developer has proposed mitigation measures in addition to these Metro River requirements and in addition to state and local laws mandating soil erosion and storm water control which include: "Post" landscaping and a Greenway Trails system.

P O Box 7338 Atlanta, Georgia 30357-0338
404-816-9888

Riverkeeper's concerns fall into three major categories: adequate storm water detention (quality and quantity), development density related to sewage capacity, and ownership of the required 500' buffer along the River.

(1) According to ARC's Review Report: "ARC identified the Chattahoochee as a Regionally Important Resource which is threatened by the impact of storm water runoff from rapid urban development. The State DNR has identified the primary cause of use impairment in the Chattahoochee as nonpoint source pollution from urbanized areas. Therefore, the design, maintenance and inspection/monitoring of storm water controls will be very important for protection of the River."

The developer states that it will provide storm water detention "to City of Atlanta standards". Our review of Atlanta's Storm Water Management ordinance (Article E, Section 9-5132, Atlanta City Code) indicates that it provides very general and minimal guidance and few stringent requirements. Because the storm water issue is so critical to the Chattahoochee River, we believe that mere adherence to the City's ordinance will not provide sufficient controls to minimize damaging impacts to the River. Therefore, we recommend that the developer work with storm water control experts and hydrologists to devise a detention plan which provides for both quality and quantity control.

Representatives of the developer have indicated they would like to work with Riverkeeper and others on this issue, however, we have not seen any detailed proposals as of this date. Unless such a comprehensive storm water control plan is a condition of any ARC or local government approval, we believe that the proposed development should not be considered to be " in the best interest of the State".

(We are equally concerned about storm water runoff *during* construction of this project and have urged the developer to set an example by using state-of-the-art erosion control measures to curtail the transport of eroded materials from the developing site and into the Chattahoochee River.)

(2) We remain concerned that the density of the proposed development (600 apartment units and 200,000 square feet of office space) will put significant pressure on the existing sewage system which will carry the site's wastewater to Cobb County's Sutton Plant for treatment. It is our understanding that numerous apartment complexes and other developments are proposed for construction in the vicinity of this proposed project. While the Sutton plant apparently has room to handle additional flow at this time, many other projects in Cobb County will be seeking to use its capacity. There

does not appear to be any assurance that the recently-expanded Sutton plant will be allowed future expansion due to the significant wasteload which the Chattahoochee River is already receiving from many plants.

(3) The above-referenced 500' buffer along the River (which must be preserved in order for the developer of this site to achieve desired densities on remaining portions of the tract) was identified by the National Park Service at the inception of the Chattahoochee River National Recreation Area (1978) as a tract of land which should be a part of the federal park due to its scenic nature and proximity to significant portions of the park known as the "Palisades". This buffer strip along the River was designated within the "authorized" boundary for future acquisition, however, due to limited funds the NPS has been unable to acquire this property. We urge the developer to consider a donation of this buffer land (approximately 33 acres) to the National Park Service in order to help realize the park vision established nearly two decades ago.

Thank you for the opportunity to provide these comments.

Sincerely,

Sally

Sally S. Bethea
Executive Director

cc: Katharine Kelly, Post Apartment Development
Clair Muller, City Councilwoman
S.B. Liebmann, NPU - A
The Georgia Conservancy
Superintendent Marvin Madry, National Park Service