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

Harry West
Director

July 10, 1998

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

RE: Development of Regional Impact
Paces Plaza

Dear Bill:

I am writing to let you know that the ARC staff has completed review of the Paces Plaza Development of Regional Impact (DRI). Our finding is that this DRI is in the best interest of the State. I also want to say that we are pleased to see this type of mixed use development being proposed in the Atlanta Region. We feel that projects like this can reduce single occupant vehicle trips and this is essential if we are to solve the Region's air quality problem.

I am enclosing a copy of our review report and a copy of comments we received on the DRI from Georgia Department of Transportation.

Please feel free to call us if you have any questions concerning our review.

Sincerely,

Harry West
Director

Enclosures

c Mr. Michael Dobbins, City of Atlanta
Mr. Ben Carter, Ben Carter Properties
Mr. Carl Westmoreland, Powell, Goldstein
Mr. Wayne Shackelford, Georgia DOT
Mr. Paul Radford, Georgia DCA
Mr. Harold Reheis, Georgia EPD

Facility: Paces Plaza
Preliminary Report: July 1, 1998
Final Report: July 10, 1998

DEVELOPMENTS OF REGIONAL IMPACT

REVIEW REPORT

PROPOSED DEVELOPMENT

210,000 sq. ft. retail, 170,000 sq. ft. office, 220 apartments (replaces 80,000 sq. ft. office building)

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. The development requires a land use map amendment from O-I to mixed use. The existing zoning would allow 2 million sq. ft. of office space including 80,000 sq. ft. ancillary retail. The proposed development is a much lower density than what could be constructed under the existing zoning.

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

OK

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 220 apartments could accommodate a population of 330; the office and retail space could accommodate 987 jobs. (By these same averages, the office building being replaced could accommodate 267 jobs. Therefore, the new development would represent an increase of only 720 jobs.)

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

The nearest DRI which ARC has reviewed is the Post Riverside development at Northside Parkway and the Chattahoochee River.

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

The development will replace an existing 80,000 sq. ft. office building.

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 proposed for development is on Northside Parkway just south of its intersection with Howell Mill Road. 84°25'15"/33°50'30"

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?

Based on a built-out value of $63 million, the development could generate $3 - 4 million annually in taxes.

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

1,500

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 development represents a rather unique concept in the Atlanta Region with office and apartments over ground and some second level retail.

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

Watershed Protection / Wetlands/Floodplains
The proposed project is not located within a water supply watershed. As such, no minimum DNR watershed protection criteria apply. There are no wetlands within the site. Further, there are no areas of the proposed development site within the 100-year floodplain.

Storm Water / Water Quality
If the development goes forward, steps should be taken to limit the amount of pollutants that will be produced during and after construction. During construction, the project should conform to the City's erosion and sediment control requirements. After construction, water quality can be impacted without storm water pollution controls. The amount of pollutants that will be produced under existing landuse conditions and after construction of the

proposed Paces Plaza was estimated by ARC. These estimates are based on some simplifying assumptions for impervious surface and 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

Approx. 14.1 acres	Total Phosphorus	Total Nitrogen	BOD	TSS	Zinc	Lead
Existing land cover (approx. 55% impervious)	1.59	12.65	64.24	602.65	2.19	0.01
Proposed Development (approx. 70% impervious)	1.87	14.92	75.77	710.81	2.58	0.02
Difference	**0.29**	**2.27**	**11.53**	**108.17**	**0.39**	**0.01**

The City of Atlanta should take steps to mitigate any additional potential impacts. The Interim Regional Storm Water Quality Management Guidelines, adopted by the Atlanta Region, provide suggestions for addressing storm water quality. These guidelines offer technical guidance for the control of post-development pollution in storm water (find attached).

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 or units	Weekday	AM Peak Hour Enter	AM Peak Hour Exit	PM Peak Hour Enter	PM Peak Hour Exit
Apartments	220 units	1,384	19	92	139	65
Retail	210,000 sq. ft.	11,237	211	124	526	526
Office	170,000 sq. ft.	2,096	257	223	47	228
Total		**14,717**	487	439	712	819

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?

Current traffic volumes for Northside Parkway and West Paces Ferry Road are based on 1997 GDOT coverage counts. Current traffic volumes for I-75 and 2010 volumes for all facilities listed below were obtained from the ARC transportation model.

Facility	1996 Lanes	1996 Volume	1996 V/C Ratio	2010 Lanes	2010 Volume	2010 V/C Ratio
Northside Pkwy from Moores Mill Rd to W Paces Ferry Rd	4	25,600	**.5**	4	42,300	**.9**
W Paces Ferry Rd from I-75 to Northside Dr	2	27,100	**1.0**	2	30,300	**1.1**
I-75 from Moores Mill Rd to W Paces Ferry Rd	8	141,00 0	**.9**	10	176,000	**.9**
I-75 from Paces Ferry Rd to Northside Dri	8	140,00 0	**.9**	10	174,000	**.9**

This table indicates that the area road network generally has sufficient capacity to meet current and future demand. Increasing traffic volumes indicate that West Paces Ferry Road will operate at congested peak hour conditions by 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)?

The ARC's adopted Interim Atlanta Regional Transportation Improvement Program FY 1998 - FY 2000 (ITIP) and the Atlanta Region Bicycle and Pedestrian Walkways Plan, 1995 Update include no projects in the vicinity of the site.

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.

The site is served by a moderate level of MARTA bus service.

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

No current plans to expand transit service in the area of the site are known.

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 DRIs or major developments? Is the transportation system (existing and planned) capable of accommodating these trips?

The area traffic volume analysis indicates that the area road network generally has sufficient capacity to meet current and future demand. Increasing traffic volumes indicate that West Paces Ferry Road will operate at congested peak hour conditions by 2010.

Viable transportation alternatives to single-vehicle automobile travel will become critical over the coming years to preserve and improve access and the mobility of people and goods in the area. To foster such alternatives it is recommended that the City require the following things (which are proposed in the plan):

- an internal sidewalk network linking all parts of the development including the residential, commercial, and office areas;
- sidewalks along external street frontages to connect to existing or future area-wide sidewalk facilities;
- onsite bus turnaround areas or adjacent bus stop sites to accomodate possible future MARTA service to the site in the area.

AIR QUALITY

The development is estimated to generate approximately 44 tons of NOx per year.

INFRASTRUCTURE
Wastewater and Sewage

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

According to regional averages, the development could generate 0.11 MGD wastewater. (The existing development, by these averages, generates 0.016 MGD.)

Which facility will treat wastewater from the project?

R.M. Clayton Water Pollution Control Plant

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

100 MGD permitted flow

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

ARC has reviewed a number of developments which would increase flow to this plant; however, some of these developments have been completed and others are no longer planned. ARC staff has recommended that both flows and commitments be monitored by both the City and DeKalb County which has 50% of the plant's capacity under a long-standing contract. ARC has also recommended an aggressive infiltration and inflow correction effort to relieve wet weather problems.

INFRASTRUCTURE
Water Supply and Treatment

How much water will the proposed project demand?

Again according to regional averages, 0.13 MGD. The City should have sufficient water supply but water conserving measures, including xeriscaping, are important for all new developments.

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

Negligible impact.

INFRASTRUCTURE
Solid Waste

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

Information submitted with the review indicates 1,950 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 but a comprehensive, mixed-use development of this type would provide a prime opportunity to develop a program.

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? (Less than 10 students would be expected from the development)
- 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?

No; the project includes 220 apartments.

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?

There is a very limited supply of low and moderate price housing in this area.

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

Since MARTA bus service is available for the development, employees will be able to access more affordable housing than exists in the immediate vicinity.

* 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.

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.

	Inches of Runoff	
Land Use	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.

DRI–REQUEST FOR COMMENTS

Instructions: The project described below has been submitted to this Regional Development Center for review as a Development of Regional Impact (DRI). A DRI is a development project of sufficient scale or importance that it is likely to have impacts beyond the jurisdiction in which the project is actually located, such as adjoining cities or neighboring counties. We would like to consider your comments on this proposed development in our DRI review process. Therefore, please review the information about the project included on this form and give us your comments in the space provided. The completed form should be returned to the RDC on or before the specified return deadline.

Preliminary findings and comments of the RDC:

Paces Plaza - see attached preliminary report

Comments from affected party (attach additional sheets as needed):

The present traffic volume on Northside Parkway in the vicinity of the proposed Paces Plaza development is approximately 21,000 vehicles per day. The addition of the traffic generated by this proposal would severely impact the transportation level of service Northside Parkway could provide, even with the reductions due to the mixed-use nature of the development. However, the Department generally supports development patterns of the type which encourage more efficient use of transportation infrastructure, and will work with ARC to plan, develop and implement the necessary transportation facility improvements for this and similar types of developments.

Individual completing form: ROBERT E. BOWLING

Local Government: GA DOT

Department:

Telephone: (404) 657-6916

Signature: Robert E. Bowling Date: 7/10/98

Please return this form to:

Mrs. Beverly Rhea
3715 Northside Parkway
200 Northcreek, Suite 300
Atlanta, GA 30327

Return Deadline: July 10, 1998