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

Harry West
Director

September 30, 1996

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

RE: Development of Regional Impact--Alexander Tract Mixed Use Development

Dear Mayor Campbell:

I am writing to let you know that we have completed the regional review of the Alexander Tract Mixed Use Development of Regional Impact (DRI). Our finding is that the proposed DRI is in the best interest of the State according to the regional review which considers impacts on the Region's infrastructure and services and intergovernmental impacts. Our finding does not necessarily imply that the proposed development is in the best interest of the City. We note on the DRI application form that the proposed DRI is not consistent with the City of Atlanta Comprehensive Plan and therefore may not be in the City's best interest.

I am enclosing a copy of our review report and a copy of comments we received from MARTA as a part of our review.

We ask that you feel free to call us if you have any questions at all about our review.

Sincerely,

Harry West
Director

Enclosures

c Ms. Melora Furman, Atlanta Zoning
Mr. Michael W. Tyler, TAP Associates
Mr. Rick Brooks, Georgia DCA
Mr. Rick Simonetta, MARTA
Mr. Wayne Shackelford, Georgia DOT
Mr. Harold Reheis, Georgia EPD

ALEXANDER TRACT
DEVELOPMENT OF REGIONAL IMPACT

INTRODUCTION

In December, 1990, ARC reviewed the 21.8 acre Alexander Estate property for a proposed 3,276 residential units. Following ARC's review, the property was split and the portion along the current Buckhead Loop and Phipps Drive was removed from the zoning request. The northwestern part of the property remained in the zoning request and 500 multi-family units were approved. Only 234 units were constructed.

The Buckhead Loop/Phipps Drive section of the property is now proposed for rezoning for 900,000 square feet of office space, 10,000 square feet of retail space, 584 condominiums and a 400-room hotel on 10.8 acres.

Facility: Alexander Tract
Preliminary Report: August 22, 1996
Final Report: September 30, 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.

No, according to information submitted with the review. The Atlanta Comprehensive Plan proposes residential future land use.

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

No inconsistencies were noted in the review.

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 584 condominiums could accommodate a population of 876, including 168 students. Student numbers are likely high for this development as they are based on regional averages.

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

ARC has reviewed numerous developments proposed in the vicinity of this project, including a previous review of this site.

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 on the north side of the Buckhead Loop and west of Phipps Drive. 33° 51'/84° 22'

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 approximately one mile from the Atlanta-Fulton/DeKalb Line.

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 impacts were identified in the review process.

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?

According to information submitted with the review, $40,815,219 from all sources. ARC estimates $10,406,000 annual property tax at build-out.

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

The number of short-term jobs will depend upon construction schedule. According to regional averages, the development could accommodate 3,420 long-term jobs.

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 Lenox-Phipps area already includes all the land uses proposed in this project; therefore, the development would compete with exising uses.

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?

The proposed project site is located in the Chattahoochee River Water Supply Watershed. Under DNR watershed protection criteria, the Chattahoochee River Water Supply Watershed is a large water supply watershed. None of the DNR watershed protection criteria for large water supply watersheds applies to this project. Further, the proposed site does not appear to include any floodplains, significant groundwater recharge areas, or wetlands.

Water quality in the Chattahoochee River Water Supply Watershed can be impacted without storm water pollution controls. The amount of pollutants that will be produced after construction of the proposed Alexander Tract 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
Office (3.0ac)	3.9	51.4	342.0	4.4	0.57
Residential (6.3ac)	6.6	110.7	422.1	4.8	0.88
Hotel (1.0ac)	1.05	10.71	67.0	0.76	1.6
Total	**11.6**	**172.8**	**831.1**	**10.0**	**1.6**

If the development is approved, the city should take steps to mitigate 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 a.m./p.m.) will be generated by the proposed project?

Land Use	Units or Square Feet	Week Day	AM Peak Hour Enter	AM Peak Hour Exit	PM Peak Hour Enter	PM Peak Hour Exit
Office	900,000	7,390	940	120	160	780
Retail	10,000	1,680	30	20	80	80
Condominium	584 units	2,920	40	170	180	90
Hotel	400 rooms	3,460	170	110	160	130
Total		**15,450**	**1,180**	**420**	**580**	**1,080**

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 1995 GDOT coverage counts from area facilities that will likely provide the primary route for traveling to the proposed Alexander Tract development. 2010 volumes for these facilities were obtained from the ARC Regional Transportation Model:

Facility	1995 Number of Lanes	1995 Volume	1995 V/C Ratio	2010 Number of Lanes	Forecast 2010 Volume	2010 V/C Ratio
Peachtree Road from Stratford Road to Lenox Road/Buckhead Loop	6	41,730	.58	6	57,550*	.80
Wieuca Road from Peachtree Road to GA 400	2	10,940	.76	2	13,256	.92
Buckhead Loop from Peachtree Road to GA 400	6	36,720	.54	6	50,600*	.75
GA 400 from Sidney Marcus to Buckhead Loop	6	87,970	.93	6	108,000	1.12
GA 400 from Buckhead Loop to Windsor Parkway	6	88,500	.92	6	112,000	1.16

*calculated using linear regression

The table above shows that all facilities in the project vicinity currently operate at or below their respective carrying capacities. Future volume forecasts indicate severe congestion on GA 400 and peak hour congestion on all the facilities in the vicinity of the project site.

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 099 - Intersection improvement at SR 141/Peachtree Road at Tower Place. Preliminary engineering was scheduled for FY '96 and construction is scheduled for FY '97.

In addition, the Long Range Element of ARC's Regional Transportation Plan: 2010 includes three proposed projects in the vicinity of the proposed development:

AT 008 - Four-lane upgrade of Piedmont Road from Roswell Road to Peachtree Road. No work is scheduled until FY 2002 or later.

AT 066 - Widening Stratford Road from Buckhead Loop to Peachtree Road from 2 to 4 lanes. No work is scheduled until FY 2002 or later.

AT 067 - Construct 2-lane Access Road C from Wieuca Road Connector to Tower Place Drive. No work is scheduled until FY 2002 or later.

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?

The development site is between the Lenox and Buckhead MARTA stations.

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

Yes. MARTA bus routes 23 and 25 serve the site. Both routes operate seven days a week, serving the Lenox MARTA rail station.

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

MARTA commented that the Buckhead Station was within easy walking distance of the proposed development site but some modifications would be needed to the ingress/egress system.

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

None.

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

Five DRI's/Major Development Area Plans have been reviewed in this area. All of the developments are clustered around Phipps Plaza. The cumulative trip generation appears below.

Name	Land Use	Week Day
Principal Place	3,500,000 square feet office, 50,000 square feet retail, 100 units residential, 400-room hotel	43,010
Monarch Plaza Expansion	724,000 square feet office	7,000
3630 Peachtree	1,030,000 square feet mixed use	9,551
Laing Stratford	1,390,000 square feet office, 10,000 square feet commercial, 1,398 units residential, 700-room hotel	19,969

Name	Land Use	Week Day
Phipps Plaza Renovation	850,000 square feet office, 1,200,000 square feet retail, 500 units residential	37,473
Alexanter Tract	900,000 square feet office, 10,000 square feet retail, 584 units residential, 400-room hotel	15,450
	Total	**132,453**

The table above shows that these developments, if built as proposed, will add 132,453 daily trips to the local road network. As 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.

In addition, Buckhead area employers should consider implementation of transportation demand management strategies. These employers should contact ARC's Commute Connections program for more information.

INFRASTRUCTURE

Wastewater and Sewage

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

According to regional averages, the proposed development could generate 0.367 MGD of wastewater.

Which facility will treat wastewater from the project?

R. M. Clayton WWTP

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

100 MGD - Monthly Average Permitted Flow
76.83 MGD - Monthly Average Flow for 1995

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

ARC has reviewed numerous developments which could add 23.49 MGD flows to the R. M. Clayton WWTP if built as proposed. Consequently, developments will have to be timed with available treatment capacity.

INFRASTRUCTURE
Water Supply and Treatment

How much water will the proposed project demand?

According to regional averages, the proposed development could have a demand for 0.422 MGD water.

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 supply for this project.

INFRASTRUCTURE
Solid Waste

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

Approximately 2,300 tons. The development would contract with private companies for service.

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 includes 584 condominiums.

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?

Mostly upscale ranges in the immediate vicinity.

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

Likely, given that the development is very accessible to MARTA stations.

* 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.

DEVELOPMENTS OF REGIONAL IMPACT
Comments from Affected Parties Form

Project I.D: Z-96-36
(From Request for Comments Form)

Name of Commenting Organization: Metropolitan Atlanta Rapid Transit Authority (MARTA)

Address: 2424 Piedmont Road, NE
Atlanta, GA 30324

Contact Person: Gerald J. Pachucki Telephone Number: (404) 848-5320

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

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

A high density project at this location would have a positive effect for the MARTA system since the Buckhead Station is located within easy walking distance of this proposed project. High density would provide increased patronage for this station. Modifications would need to be made to the current station ingress/egress system. MARTA should be involved directly with any efforts to develop major projects in this station impact area.

The introduction of office/hotel/commercial uses to a tract designated for residential uses in the Atlanta CDP land use element in an issue that will be addressed by the City of Atlanta.

(Attach Additional Pages if Necessary)

Form Completed By: Gerald J. Pachucki Title: Director Planning & Policy Development

Signature: Gerald J. Pachucki Date: 9-10-96

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

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.