November 26, 1997

***Via Facsimile (404/364-2599)***
***And Regular Mail***

Hines

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

Re: **Overton Park-Hines Interest Development in Northwest Atlanta**

Dear Beverly:

In accordance with our conversation two days ago, we withdrew our rezoning application on November 24, 1997 from the Cobb County Planning Commission Agenda. We plan to resubmit on December 4, 1997 and ask the County to begin the ARC review process anew at that time. Thank you for you and your staff's assistance and cooperation in reviewing this very important project.

Best wishes to you and family during this Thanksgiving season.

Very truly yours,

Robert P. Voyles
Senior Vice President

Cc: Harry West (Atlanta Regional Commission)
Joel Stone (Atlanta Regional Commission)
John Hicks

Beverlyrhea-11-26-97

Facility: ~~Kennedy Tract Mixed Use Development~~ Overton
Preliminary Report: ~~April 15, 1994~~ October 22, 1997
Final Report: ~~May 13, 1994~~

## 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. The Cobb County Comprehensive Plan identifies the area as "regional activity center."

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

To be determined
~~No inconsistencies were noted~~ in the review process.

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

According to information submitted on ~~the~~ a previous review, ~~the proposed~~ development in this area will impact implementation of Cobb County's short-term work program.

**Will the proposed project generate population and/or employment increases in the Region? If yes, what would be the major infrastructure and facilities improvements needed to support the increase?**

The project could accommodate 5,321 ~~5,200~~ jobs ~~and 875 residents~~ according to regional averages. The site would be accessed from the proposed Kennedy Parkway and the relocated Akers Mill Road.
Information submitted with the review indicates 10,000.

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

The nearest major development which ARC reviewed was the ~~Cumberland Center/Riverwood project, located between this site and the Cumberland Mall area of Cobb County. The total project included 2.7 million square feet of office space and 250 hotel rooms on 85 acres.~~ recently reviewed Kennedy Center office and hotel development across I-75 on the Kennedy Parkway.

**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 east central Cobb County and bounded by I-75 on the west, I-285 on the north, and by the proposed Kennedy Parkway on the east and south. 84°26'30"/33°53'

**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 site is near the Chattahoochee River (but not in the Chattahoochee Corridor) and therefore near the City of Atlanta and Fulton County. It is also near the City limits of Smyrna and Marietta and is contiguous to federal park land.

**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.**

~~See comments from City of Smyrna and National Park Service.~~ To be determined 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?**

The development could generate approximately ~~$2.5~~ 4.5 million annual ~~property~~ tax revenue at build out based on the developer's estimated value ~~and current tax rates in the County.~~

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

The developer estimates 1,000 short-term jobs will be generated and 10,000 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 proposed development would compete with other nearby office and hotel developments. ~~There are no other high rise residential developments in the immediate vicinity.~~ such as Riverwood, Cumberland, and Galleria.

## 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.**

**Impacts on CRNRA**

The East Palisades and West Palisades/Paces Mill units of the Chattahoochee River National Recreation Area (CRNRA) 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. The portion of the West Palisades trail leading away from Interstate 75 and located between Rottenwood Creek and the proposed development is particularly tranquil, as is the trail along the ridge between Rottenwood Creek and the Chattahoochee River. In addition, rafting and canoeing in this area, on a stretch of the Chattahoochee River below the Riverbend development and along the CRNRA boundaries, offers 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 adjacent to the proposed ~~MUD~~ development and Parkway 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." Given the proposed structure heights in the proposed MUD development and the terrain, the project could ~~would~~ impact scenic views from the East Palisades Unit and the Chattahoochee River at the mouth of Rottenwood Creek and may be visible from the West Palisades Unit, particularly in winter.

In addition to the visual impacts, noise from the proposed project and proposed development could parkway ~~will~~ also affect the quiet nature hiking experience on the section of the Rottenwood Creek trail that leads away from I-75 beyond the sewer line crossing and the hiking area on the western side of the ridge of the West Palisades unit.

Therefore ARC staff would appreciate information on sight lines from the River and from the CRNRA trails as well as noise studies.

**Impacts on Rottenwood Creek**

Rottenwood Creek, a tributary to the Chattahoochee, is adjacent to the proposed project site. In addition, a ~~tributary to~~ Rottenwood flows through the site. ~~This portion of~~ Rottenwood Creek is a very scenic component of the CRNRA West Palisades Unit. ~~The creek is also a tributary to the Chattahoochee River.~~

Rottenwood Creek is threatened by storm water pollution and siltation problems. The creek is listed ~~in~~ Georgia EPD's ~~most recent~~ water quality report as not supporting its water use classification under the Clean Water Act. Adopt-a-Stream data shows fairly good water quality in this portion of Rottenwood but low biodiversity. The proposed development will further impact this fragile stream environment.

Based on some simplifying assumptions for typical pollutant loading factors, ARC staff developed estimates of pollutant loadings the proposed project will create compared to loadings under the existing land cover. Loading factors used to develop these estimates are based on results of storm water monitoring of office developments in the Atlanta Region. Staff's analysis projected that total phosphorus loadings from the site will increase 16 times over existing loadings, total nitrogen loadings are expected to be 28 times higher, with BOD levels 13 times higher, zinc levels 49 times higher, and lead levels 6 times higher.

In addition to problems associated with pollutants, runoff from the site ~~will~~ could increase the flow in Rottenwood Creek and the frequency with which the creek overflows its banks. ~~Existing County regulations for storm water detention do not address the frequency with which bankfull discharge occurs, which on average is every two years for natural watersheds.~~ These impacts lead to increased streambank and channel scouring and sedimentation in the stream, which would destroy habitat, reduce the streamflow capacity in some areas and add to the sediment load in the Chattahoochee River.

While storm water controls have been proposed to handle runoff associated with the proposed project and the parkway, structural controls do not achieve 100% removal for every pollutant of concern. This fact makes controlling runoff from the proposed project site all the more important if further stresses on Rottenwood Creek are to be avoided. The applicant has verbally stated in meetings that storm water controls for the site will employ detention ponds ~~located below the proposed development's~~ parking decks and that these controls will also serve the proposed Kennedy Parkway, however no more specific plans have been presented.

The use of structural control facilities such as these can pose a risk to water quality. Design conditions specified in Paragraph (3), Exhibit B of the December 8, 1993 Kennedy Parkway agreement between the Georgia Conservancy and Cobb CID are not adequate to address the pollution and streambank erosion problems mentioned previously. The storm water management structures called for in that agreement will, at best, remove only floatable and suspended pollutants, and will not remove dissolved phosphorus, nitrogen or BOD. The agreement also does not specify the length of time storm water should be detained, nor is the applicant required to show, through design, that downstream erosion will be controlled by maintaining streamflow volume and frequency at pre-development levels. Even if the proposed structures were designed

those underground
properly, ~~they~~ are not likely to be adequately inspected and maintained, because of the difficulty of accessing underground structures. In addition, integrating storm water management facilities for the proposed development and the Kennedy Parkway presents problems, because the projects will be constructed over a different period of time. The applicant must clearly indicate how storm water runoff from the proposed development will be controlled before construction of permanent facilities at the site is allowed.

could

**Impacts on the Chattahoochee River**

The proposed project ~~will also~~ have negative impacts on the Chattahoochee River. Both the ~~proposed MUD~~ and Kennedy Parkway are within the Chattahoochee River watershed, with the proposed ~~MUD~~ site located approximately 2500 feet from the river itself at its ~~closest~~ approach. The impacts the proposal and other developments will create are of great concern, as the Chattahoochee and its tributaries provide the Atlanta Region with approximately 70 percent of its drinking water, unique recreational opportunities, and wildlife habitat. 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 ~~MUD~~ is development located) does not meet all standards for its water quality classification under the Clean Water Act. At the Atlanta water supply intake, which is just downstream of the Chattahoochee's confluence with Rottenwood Creek, 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.

Overton

Overton

**Wastewater Management Issues**

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It is estimated that this development would discharge an average of 0.~~39~~ MGD to the Cobb Water System's sewer collection system and receive treatment at the R.L. Sutton Water reclamation plant. There are two wastewater management issues related to this project: 1) sewerline capacity; and 2) wastewater treatment capacity.

Sewerline Capacity: The most serious problem with wastewater management is infiltration and inflow (I/I) of stormwater into the sewer system. ~~The peak daily flow recorded at the R.L. Sutton plant is 71.8 MGD in December, 1993. Although this is a rare occurrence and did not result in a permit violation, it is an indication of serious I/I problems.~~ The sewerline that would receive wastewater from this development runs along Rottenwood Creek to the major trunk line along the Chattahoochee River. National Park Service staff have complained of odors and overflows from this line. There is documentation of minor sewer overflow problems from this line in EPD's files. If additional development is added to this sewerline, the Water System should conduct a sewerline capacity analysis and investigate infiltration and inflows into the sewer system to insure that adequate capacity exists and overflows during wet weather are not a problem.

Wastewater Treatment Capacity: The R.L. Sutton plant is currently permitted to treat discharge of 40 MGD on a monthly average basis and 50 MGD on a weekly average basis. ~~The peak monthly flow at the plant of 35.5 occurred in January 1993, however, 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 dry weather capacity exists in this plant to accommodate this development. However, peak day flows indicate the County should implement an infiltration and inflow correction program to control wet weather peak flows. Also, if all developments reviewed in this sewer service area were eventually built, dry weather flows might approach or exceed 40 MGD. Although the Water System is considering expanding the plant in the future, 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.

**Recommendations**

In order to minimize adverse impacts on the important resources described above, ARC staff recommends the following for discussion with the applicant:

- Limit building heights with careful siting to eliminate visual impacts to CRNRA.

- Pollutants running off the site should be controlled to the Maximum Extent Practicable (MEP). Per EPA guidance, MEP involves reducing, for example, the suspended solid loadings from the developed site by 80%.

- Velocity and volume of runoff should be maintained at pre-development levels. The combined effect of upstream development and on-site controls should not increase the frequency with which the 2-year, pre-development discharge occurs in Rottenwood Creek.

- An appropriate means to achieve these storm water quality and quantity goals, is to construct vegetated, extended wet retention basins, designed to provide a two week detention of the annual average storm at the site. Additional storage provided above the permanent pool, combined with an appropriately designed outlet control structure, could give the necessary control for both storm water discharge and frequency to control downstream erosion.

- Underground detention ponds may not be appropriate for this site, since they cannot sustain the vegetation needed to remove dissolved pollutants such as nutrients. In addition, underground ponds are generally difficult to access for inspection and maintenance.

- The intensity of development at the site should be adjusted to provide space for the construction of the wet detention basins.

- Vegetative buffer strips along Rottenwood Creek which flows through the site should supplement the wet detention ponds.

- If structural storm water controls are not maintained properly, they will provide no benefit. Monitoring of runoff both into and leaving the site should be conducted for 2 to 5 years to ensure that storm water controls are functioning as designed. The developer's storm water plan should require the developer to submit a detailed, long-term schedule for inspection and maintenance of the stormwater

facilities. This schedule should describe all maintenance and inspection requirements and persons responsible for performing maintenance and inspection activities. Provisions should be made for the County to inspect the facilities during and after construction.

These provisions and the monitoring program should be included in a formal, legally binding maintenance agreement between Cobb County and the responsible party. The County should not release the site plans for development or issue any grading or construction permits until a fully executed maintenance/monitoring agreement is in place and this agreement been made part of the property deed.

- Cobb County should consider preparing a drainage master plan for the Rottenwood Creek watershed that addresses the water quality and quantity impacts of storm water.

- The County should address infiltration and inflow problems associated with the sewer line which runs adjacent to Rottenwood Creek and the R.L. Sutton service area. These problems will only become worse with increased development.

## HISTORIC RESOURCES

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

No. However, the site proposed for development is near the Akers Mill ruins.

**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?**

Information submitted with the rezoning indicates AM peak hour traffic of 2,246 entering and 516 exiting and PM peak hour traffic at 765 entering and 1,994 exiting.

| Land Use | Weekday Trips | AM Peak Hour Enter | AM Peak Hour Exit | PM Peak Hour Enter | PM Peak Hour Exit |
|---|---|---|---|---|---|
| Hotel (200 units) | 1,700 | 75 | 50 | 80 | 65 |
| Office (1.5 Mil. Sq. ft.) | 10,870 | 1,395 | 170 | 230 | 1,140 |
| Residential (250 Units) | 1,145 | 20 | 80 | 65 | 30 |
| | 13,715 | 1,490 | 300 | 375 | 1,235 |

The developer currently expects build-out to be complete by the year 2006. The above trip generation figures were calculated using the Institute of Transportation 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 1993 GDOT coverage counts from area facilities.

| Facility | # of Lanes | 1993 Volume | V/C Ratio |
|---|---|---|---|
| I-75 South of I-285 | 8 | 190,900 ~~170,000~~ | 1.22 ~~1.75~~ |
| I-285 East of I-75 | 8 | 228,900 ~~176,000~~ | 1.66 ~~1.80~~ |
| Akers Mill Road US 41 to Northside Drive | 2 | 18,506 ~~19,000~~ | 0.70 ~~0.86~~ |
| US 41 South of Akers Mill | 4 | 26,900 ~~28,000~~ | 0.57 ~~1.26~~ |

Future traffic forecasts for area facilities were ~~developed~~ cooperatively by ~~ARC, GDOT~~ and Cobb County's consultant. The results of this cooperative analysis are contained in the Cobb County Regional Traffic Study/Interchange Studies Report (Interchange Studies Report) prepared for Cobb County by Moreland Altobelli Associates, Inc. in 1991. ARC's home-based-work person-trip distribution for each traffic zone was utilized for the study.

In the Interchange Studies Report, trip generation estimates were developed using assumptions of future development types and densities for parcels in the Kennedy Parkway area. An estimate of 8,180 daily trips was calculated for the ~~Kennedy~~ Overton site now under review based on an assumption of 1 million square feet of office space. The proposed project, with ~~1.5~~ million square feet of office space, ~~a 200 unit~~ hotel rooms and ~~a 250 residential units~~, will significantly exceed the daily trip generation that was assumed for this site in the Interchange Studies Report. Therefore, impacts on the Kennedy Parkway, other local facilities and the connecting freeway system will be far greater than anticipated by the study.

30,000 square feet of restaurant/retail space

1,384 8 648

The Interchange Studies Report analyzed alternative transportation scenarios including implementation of the Kennedy Parkway Interchange system at the junction of I-75 and I-285. The GDOT provided Average Daily Traffic for the design year of 2014 for Scenario 2 (Base or No-Build). To develop the year 2014 Average Daily Traffic for Scenario 4 (Build the Kennedy Parkway Interchange), the ARC Year 2010 ADT for the base system was compared to ARC year 2010 ADT with implementation of the interchange. These differences were used to adjust the Year 2014 Scenario 2 traffic (Future base) to Year 2010 Scenario 4 traffic.

| Facility | # of Lanes | 2010 ~~2014~~ Volume* | V/C Ratio* |
|---|---|---|---|
| I-75 | | | |
| So. of Kennedy Interchange | 8 | 210,000 ~~234,600~~ | 1.34 ~~2.41~~ |
| I-285 | | | |
| Powers Ferry Rd. to Kennedy Parkway | 8 ~~10~~ | 250,200 ~~309,900~~ | 1.81 ~~2.55~~ |
| Kennedy Parkway | | | |
| I-75 to I-285 | 4 | 20,500 ~~28,400~~ | 0.39 ~~1.57~~ |
| Akers Mill | | | |
| US 41 to Kennedy Pkwy. | 4 | 19,~~900~~ 000 | 0.64 ~~1.10~~ |
| US 41 | | | |
| North of Kennedy Pkwy. | 8 | 52,000 ~~46,100~~ | 0.48 ~~1.03~~ |
| South of Kennedy Pkwy. | 8 | ~~37,600~~ 38,800 | ~~0.86~~ 0.36 |

*Note: Land use and density estimates used to derive these numbers were well below currently proposed levels. Thus, these figures must be considered underestimates of actual future traffic and congestion levels.

The above table indicates that interstate routes in the vicinity of the site greatly exceed capacity and are expected to in 2010.

Direct access to the site will be provided by Kennedy Parkway and Akers Mill Road.

**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)?**

Surface streets generally function at or near capacity and are expected to continue to

A number of improvements are currently underway in this vicinity:

Several sections of CO-R 078 are programmed in the Atlanta Regional Transportation Improvement Program FY 1994 - FY 1999 (TIP) and are described below:

CT 1A: Construct the Kennedy Parkway, a new four-lane facility, from US41 to Akers Mill Road.

CT 1B: Upgrade the I-75 bridge over the Chattahoochee River.

CT1C: Upgrade I-75 from the Chattahoochee River to Mt. Paran Road.

CT2A: Construct a new interchange at I-75.

CT2B: Relocate and widen Akers Mill Road from 2 to 4 lanes.

~~According to GDOT staff, the Environmental Assessment is currently scheduled to be issued in May, 1994 with a public hearing scheduled for June 1994. All segments of the project are expected to be let for construction in October 1994 and open to traffic in 1998. Federal funds are programmed in Tier 1 (FY94-FY96) of the TIP for construction.~~

Under Construction

R44 - Widen I-285 from 8 to 10 lanes from I-75 North to Northside Drive.

Long-Range

CO 231 - Widen US 41 from 4 to 8 lanes from Akers Mill Road to Paces Mill Road. This is a federally-funded project with preliminary engineering authorized.

**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.**

Cobb Community Transit (CCT) currently provides bus service to the Cumberland Mall/Galleria Mall area.

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

CCT staff anticipates that current local bus service would be extended to the project area though no specific plan exists at this time. There is some discussion underway for a light rail line but no specific plan exists at this time.

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

~~There are none stated.~~ The developer proposes to run a shuttle bus to the Cumberland Mall / Galleria Mall area.

ARC staff currently is coordinating development of a Regional Commute Options program which is aimed at making carpooling, vanpooling and public transit more attractive to commuters. The Program will complement existing programs and services, and provide technical information and assistance to local governments and large employers seeking to implement transportation demand management strategies. Project developers should contact ARC staff for information on developing customized commute options for employees.

**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?**

In December, 1987, ARC completed a review of another project in this vicinity, the Riverwood Center Development. Staff estimated this project would generate about 30,000 daily vehicle trips. The cumulative generation of the proposed project and the Riverwood Center is approximately 43,700 daily trips. The Riverwood proposal included 2.7 million square feet of office space and a 250-room hotel.

The Kennedy Parkway and associated transportation system improvements were intended to facilitate internal movement in the Cumberland Mall/ Galleria Mall activity center and reduce traffic on the major arterials. However, development beyond levels anticipated in the design of these facilities may reduce or eliminate any potential benefit to the local or regional road system by the Kennedy Interchange projects. Current congestion on affected facilities is anticipated to continue into the year 2010.

The US Environmental Protection Agency categorizes the Atlanta Region as a serious nonattainment area. Simply stated, the Region exceeds federal air quality standards for ground level ozone concentrations. Ozone is a colorless gas that may harm a person's respiratory system and damage property and crops. Cars and trucks discharge volatile organic compounds (VOCs) and nitrogen oxides that combine with sunlight and high temperatures to create ozone. Gasoline powered vehicles are responsible for producing nearly sixty percent of the manmade VOC's in the Atlanta Region. Currently, the Atlanta Regional Commission is working to meet federal requirements to reduce vehicle emissions to avoid possible sanctions on highway funds and development. It is important for local governments and the private sector to recognize their responsibility for contributing to the reduction of vehicle travel and associated emissions.

~~Information has not been provided by the proposed project's developer, Kennedy Trusts, regarding traffic reduction strategies to be committed to by the developer.~~ This is a matter of serious concern to both local and regional federally-funded transportation planning and projects as well as those funded by the private sector.

Projects such as the proposed ~~Kennedy Tract Mixed Use Development~~ Overton will contribute significantly to increased vehicle travel and emissions. Developers should be strongly encouraged or required to implement strategies to reduce vehicle travel associated with their projects. These strategies should both work to reduce single-occupancy vehicle trips traveling to and from the project site, and non-work related vehicle trips originating from the site. In addition to participation in the Regional Commute Options program described earlier, these strategies may include:

1) Locating and orienting buildings, driveways and parking areas to facilitate pedestrian traffic.

2) Initiating and funding carpooling and vanpooling programs and equipment.

3) Using private sector resources to subsidize transit service such as CCT for employees of this and other large developments in the area.

4) Requiring developer contributions to CCT service.

Cobb County, and all other counties in the Atlanta Region, should commit to devising and implementing such strategies in their comprehensive plans and policies.

The Kennedy Site Access Study submitted by the developer in support of the proposed project is of little value in determining the specific impacts of the proposed Kennedy Tract Mixed Use development and actions that could be taken to mitigate these impacts. The Kennedy Site Access Study provides trip generation estimates for current zoning allowances (750,000 square feet of office space) as well as a proposed development that would include a Drive-In Bank and 2.34 million square feet of office space. Therefore, the traffic impact study provides estimates of trip generation which are not consistent with the proposed uses for this project and does not analyze the actual impacts that would be created by the proposed 1.5 million square feet of office space, a 200-room hotel and 250 residential units. Furthermore, this study focuses only on traffic movement within the immediate site vicinity, rather than the entire area potentially affected by this development. Comprehensive transportation strategies and improvements that go beyond simple signalization and turning movements need to be identified, analyzed and committed to by the developer and Cobb County on a system-wide basis for the Kennedy Tract Mixed Use Development to be considered in the best interest of the Region and State.

**Water Supply and Treatment**

**How much water will the proposed project demand?**

According to regional averages, the proposed development could have a demand for ~~0.44~~ 0.33 MGD of water.

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

Given the overall situation concerning water in the Atlanta Region, it is important that water conservation measures be incorporated in the development.

**Solid Waste**

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

The developer estimates ~~1,000~~ 4,013 tons per year of solid waste. The proposed facilities would contract with private waste haulers who could dispose of the waste at any accepting facility in or outside the Region. ~~Cobb County, however, has recently begun the implementation of a major compost facility.~~

**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.

**Other facilities**

According to information gained in the review process, will there be any unusual intergovernmental impacts on:

- **Levels of governmental services?**
- **Administrative facilities?**
- **Schools?**
- **Libraries or cultural facilities?**
- **Fire, police, or EMS?**
- **Other government facilities?**
- **Other community services/resources (day care, health care, low income, non-English speaking, elderly, etc.)?**

~~No. While the 250 residential units may include a few students, it is unlikely the number would approach the regional average of 61.~~

Development in this previously undeveloped and inaccessible area will place added demand on fire, police, and EMS services.

**HOUSING**

**Will the proposed project create a demand for additional housing?**

~~The proposed development~~ includes 250 units of housing. Yes

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

~~Yes.~~ No.

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

~~Yes.~~ No.

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

~~Likely~~ Some employees will need public transit services in order to access affordable housing.

* Defined as 30 percent of the income of a family making 80 percent of the median income of the Region - 1990 median family income if $41,500 for Atlanta MSA.