

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

Post-it™ Fax Note 7671		Date 2-25	# of pages 15
To Vangiv Watkins		From Bob Rhya	
Co./Dept.		Co.	
Phone # 730-8006		Phone # 364-2562	
Fax # 730-8112		Fax # 364-9570	

In addition we have 95+ letters opposing the



Harry West  
Director

September 26, 1996

Hon. Mitch Skandalakis, Chairman  
Fulton County Commission  
141 Pryor Street  
Atlanta, GA. 30303

RE: Development of Regional Impact Review  
CSX Intermodal Facility

Dear Mitch:

I am writing to officially transmit the resolution which the Atlanta Regional Commission adopted on September 25, 1996, concerning the proposed CSX Intermodal Facility Development of Regional Impact (DRI). The Commission found that based on the information currently available, the DRI is not in the best interest of the State at this time. I also am sending you copies of comments received from other agencies during the review.

ARC staff is available to work with the County and the railroad on the concerns noted to see if they can be resolved. Please feel free to call us if you have any questions at all about this review.

Sincerely,

Harry West  
Director

Enclosures

- c Ms. Nancy Leathers, Fulton Co. Planning & Economic Dev.
- Ms. Angela Parker, Fulton Co. Planning
- Ms. Robyn MacDonald, Fulton Co. Development Services
- Mr. Norman Underwood, Troutman Sanders
- Hon. Betty Hannah, Mayor of Fairburn
- Hon. Rick Price, Chairman, Fayette County
- Mr. Frank Danchetz, Georgia DOT
- Mr. Harold Reheis, Georgia EPD

# **CURRENTLY PROPOSED INTERMODAL FACILITY**

## **CSX, SOUTH FULTON COUNTY**

**500 acres, 345.2 already zoned heavy industrial**

**16 acres in Fairburn--zoned industrial**

**bounded generally by I-85, Roosevelt Hwy, Gullat Road, Creekwood Drive**

**300 truck trips per day with initial phase of just under 900 parking bays--3,000 bays at**

**build-out so assume 1,000 truck trips per day at build-out**

**generally consistent with Fulton County future land use plan**

### **Major Concerns**

- 1. Impact on surrounding communities**
- 2. Protection of Line Creek--provides water supply for Fayette County**
- 3. Air Quality**

## **Developments Of Regional Impact Comments From Affected Parties**

CSX Intermodal Facility  
Project ID \_\_\_\_\_

Name of commenting organization: City of Fairburn  
Address: P O Box 145, Fairburn, GA 30213  
Contact: Anthony W. Cox, City Administrator

Phone: 770-964-2244

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

There are several points about this development that are of concern to Fairburn.

First, the application is inaccurate to the extent that approximately 16 acres of the project are actually located within the corporate limits of Fairburn. We are more directly impacted than merely being adjacent to the project, portions of the project site are within our boundaries. We do not have detailed plans to determine if the proposed portion(s) of the project within our jurisdiction are in compliance with existing zoning and development regulations.

The largest impact to Fairburn will be traffic. Specific traffic issues are:

- Large volumes of truck traffic will be directed to the I-85 / Hwy. 74 interchange. This exit is already severely overcrowded at peak hours. We have expressed concerns to the DOT about public safety at this intersection due to overcrowding. The CSX development will add to the traffic volume and will encourage additional transportation related development which will further compound the problem at this intersection.
- Significant volumes of heavy truck traffic through the center of the historic district (Hwy. 29) will have a negative impact on the City's attempt to maintain an active retail center with a historic theme.
- McLarin Road will be a major conduit for truck traffic from the development to Hwy. 74. This road is not designed to handle large volumes of heavy trucks. Degradation of the pavement quality and added congestion surrounding the existing businesses in the McLarin / Bohannon road area needs to be reviewed.
- Increased heavy truck traffic volume through Fairburn will increase the demand for police traffic enforcement and will increase number and severity of traffic accidents in Fairburn.
- The potential for trains to block railroad crossings during staging and "building" trains needs to be determined. Frequent and prolonged blockage of rail crossings would significantly impact the response times of Fire and Rescue personnel located on East Broad Street.

Issues of environmental impact need to be assessed. The impact on wetlands and the water table need to be determined. The level of noise, light, dust, and air pollution generated by the site needs to be assessed as well as the effectiveness of proposed mitigation efforts to control these factors.

We recommend that a study be undertaken to determine if many of the negative factors surrounding this development would be reduced by improvement of the I-85 / Hwy. 74 interchange and the construction of the new interchange at I-85 & Gullatt Road.

Form Completed by: A W. Cox, City Administrator

A. W. Cox

# DEVELOPMENTS OF REGIONAL IMPACT

## Comments from Affected Parties Form

Project I.D: CSX Intermodal Facility  
(From Request for Comments Form)

Name of Commenting Organization: Fayette County Board of Commissioners

Address: 140 Stonewall Avenue  
Fayetteville, GA 30214

Contact Person: Chris Venice Telephone Number: 770-460-5730, 163

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:

1. The site is located in the Line Creek Water Supply Watershed. Line Creek is a water supply stream and the site of a proposed reservoir. We are concerned about stormwater management issues and how runoff from this development could affect the water supply.

2. We are concerned about the development's impact on traffic circulation and movement, particularly as regards the delays and safety issues already experienced at Exit 12 on Interstate 85.

3. We are concerned about increased air pollution in the area and what, if any, hazardous materials will be stored on site while awaiting transfer.

(Attach Additional Pages if Necessary)

Form Completed By: Chris Venice Title: Dir. of Plng. and Zng.

Signature: Chris Venice Date: July 22, 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

V-A-2 p.5

# DEVELOPMENTS OF REGIONAL IMPACT

## Comments from Affected Parties Form

Project I.D.: Z 96 - 069

(From Request for Comments Form)

Name of Commenting Organization: Georgia Department of Transportation

Address: Georgia Department of Transportation

No. 2 Capitol Square

Atlanta, Georgia 30334

Contact Person: George Boulineau

Telephone Number: 656-0610

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:

— This proposed development will not adversely impact on the major existing transportation  
— facilities of Interstate 85 and US 29 (Roosevelt Hwy.). The local streets connecting the  
— two major facilities to and from the development should be evaluated to determine if they  
— can handle the added weight of the trucks.  
—

(Attach Additional Pages if Necessary)

Form Completed By: Donald W. Mills

Title: TP III

Signature: Donald W. Mills

Date: 7-24-96

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



August 20, 1996

Mr. Norman Underwood, Attorney  
Troutman Sanders  
600 Peachtree Street, NE  
Atlanta, GA 30303

FAX TO 404-885-3900

RE: Development of Regional Impact  
CSX Intermodal Facility

Dear Mr. Underwood:

During our Development of Regional Impact (DRI) review of the proposed CSX Intermodal Facility proposed in South Fulton County, a number of concerns have been raised which we feel must be addressed before we can complete our review. The concerns are as follow:

1. Protection of the Line Creek Water Supply Watershed. The proposed development is located in a small (under 100 sq.mi.) water supply watershed under EPD's classification; therefore certain minimum standards are required for protection of water quality. These include vegetative buffers and setbacks on the perennial streams which exist on the property, special requirements for handling hazardous materials, and limits on the amount of impervious surface allowed in the watershed.
2. Impact on traffic. There is concern about the number of truck trips that will be generated by the facility and how those trucks will impact the capacity of existing roads, whether some of the existing roads can handle the weight of the trucks, how the increased truck traffic will affect existing businesses and the historic district (Highway 29) of Fairburn, and whether there will be increased vehicular delays at grade crossings as the trains approach and leave the facility, which also could impact public safety services.
3. Analysis of the facility to ensure consistency with State air quality goals. Additional truck trips, locomotive activity, and yard operations are likely to generate emissions that currently are regulated in the 13-county non-attainment area in order to comply with air quality standards.
4. Further analysis of the air quality impacts associated with vehicular traffic delays that could occur at railroad grade crossings due to the increased number of trains, train length, and train speed as the trains approach and leave the intermodal facility.
5. CSX's intention concerning the 16 acres of the project site which are located in the City of Fairburn.

Mr. Underwood  
August 20, 1996  
Page 2



Our staff is available to meet with you if that would be helpful in addressing these issues. We would appreciate receiving a response as soon as possible in order not to delay our finding.

Sincerely,

Beverly Rhea  
Review Coordinator

c Ms. Nancy Leathers  
Ms. Robyn MacDonald  
Mr. Paul Radford



Facility: CSX Intermodal Freight Facility  
Preliminary Report: July 15, 1996  
Final Report: \_\_\_\_\_

## 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 facility is proposed in an area shown generally on the Fulton County Future Land Use Map as industrial. Also some 345 acres of the total 500-acre site are zoned M-2, 124.6 are zoned M-1, and 30.2 acres are zoned agricultural and commercial.

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

To be determined in the review process.

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

To be determined.

**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?**

Over the long-term, the proposed CSX Intermodal Freight Terminal is expected to generate 450 jobs in South Fulton County.

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

ARC reviewed a proposed industrial park called South Park, northeast of CSX's proposed location. This project included 655 acres with 14.3 million sq.ft. and was later expanded to 1,200 acres and 17 million sq.ft.

**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 development would be located in South Fulton County between the Cities of Fairburn and Palmetto and between I-85 and the rail line running along Highway 29 (Roosevelt Highway) 33°32'33"/84°36'30". It is bounded on the east by Creekwood Road on the southwest by Gullatt Road.

**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.**

This site is near but not contiguous to Palmetto, Fayette, and Coweta. A small portion of the site is actually contiguous to Fairburn.

**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.**

To be determined.

## **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?**

Unknown at this time.

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

50-100

**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?**

Unknown.

## **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 proposed development site is located in the Line Creek Water Supply Watershed. This is classified as a small (less than 100 square miles) water supply watershed under EPD's classification. The site also includes wetlands and floodplain areas and may have some groundwater recharge areas.

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

If the site is developed as proposed, it should be done in such manner that flood storage volumes are not reduced, wetlands are protected or replaced, and per EPD Part 5 requirements any hazardous materials handling be done on impermeable surface with spill and leak collection systems. Also, because Line Creek provides water supply for Fayette and Coweta Counties and is the site of a proposed reservoir, control of stormwater runoff from the development will be particularly important. EPD also requires that not more than 25% of the watershed have impervious surface.

## **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?**

Office                      166 trips per day  
Truck Terminal          300 trips per day  
AM Peak = 250 and PM Peak = 350

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

To be determined.

**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)?**

To be determined.

**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.**

MARTA provides bus service in the vicinity.

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

No.

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

None.

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

The only other major development underway in the nearby area is the aforementioned South Park Industrial Park across I-85 and to the north of the CSX site.

## **Wastewater and Sewage**

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

880 GPD.

**Which facility will treat wastewater from the project?**

Camp Creek.

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

Permitted	13.0 MGD
Average Annual Flow for 1995	11.74 MGD

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

ARC has reviewed ten proposed developments which, if built as proposed, could add 3.85 MGD flow to the plant. Some of these developments are completed or underway and included in current flow. Others may no longer be proposed.

**Water Supply and Treatment**

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

1,000 GPD.

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

Very minimal impact.

**Solid Waste**

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

Unknown.

**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.

## **HOUSING**

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

Very little demand.

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

No.

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

Yes.

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

Likely.

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



**SANDRA B. HARDY**

*Reed*

7870 CREEKWOOD ROAD  
FAIRBURN, GEORGIA 30213  
770-969-8575

FAX-770-969-4478

E-mail:sandrahardy@mindspring.com

Mrs. Nancy Leathers  
Dept. of Economic Planning and Development  
141 Pryor Street  
Atlanta, Georgia 30303

RECEIVED

OCT 20 1997

ARC

October 14, 1997

Dear Nancy,

Due to the fact that the permitting process for CSX Intermodal is quickly approaching. I have one matter that is of grave concern to me, and that is the ARC's Environmental Planning Division Review Comments ( see enclosure) that was submitted on April 14, 1997. Also the cover letter from Tripp Reid, Administrator from the Georgia State Clearinghouse.

CSX Intermodal saw fit to seek the ARC's approval on the proposed 500 acre facility, and got their approval. Due to that fact, I strongly suggest that CSX be held to that agreement. Even though they failed to get the 125 acres zoned to M-2 , that still does not release them from the obligation to the communities of Fairburn, Fayetteville, and Peachtree City. CSX disclosed in an interview with The Atlanta Journal and Constitution that they will seek the rezoning of the 125 acres in the future, I am requesting that CSX adhere to the 5 points the ARC brought forth in their review, and follow the suggestions to the nth degree.

I am confident that CSX will be willing to work with Fulton County and the surrounding communities to preserve the amenities we already have and not endanger the environment in any way.

Sincerely,

*Sandra Hardy*  
Sandra Hardy

cc:

Bob Regus Fulton County Manager  
Michael Hightower Fulton County Commissioner  
Tom Lowe Fulton County Commissioner  
Gordon Joyner Fulton County Commissioner  
Robert Fulton Fulton County Commissioner  
Emma Darnell Fulton County Commissioner  
Nancy Boxill Fulton County Commissioner  
Mitch Skandalakis Fulton County Chairman  
Mark Hoffman General Counsel CSX Intermodal  
Ron Sorrow CEO/President CSX Intermodal  
Jim Wilgus Post, Buckeye, Schuh and Jernigan  
Aaron Valenta Army Corps of Engineers  
Keith Parsons EPD  
Bob Lord EPA  
Beverly Rhea ARC  
Harry West Director of ARC





## OFFICE OF PLANNING AND BUDGET

ZELLMILLER  
GOVERNOR

TIMBURGESS  
DIRECTOR

### GEORGIA STATE CLEARINGHOUSE MEMORANDUM EXECUTIVE ORDER 12372 REVIEW PROCESS

TO: Nicholas Ogden  
Department of the Army/USCOE  
P.O. Box 889  
Savannah, GA 31402-0889

FROM: *TR* Tripp Reid, Administrator  
Georgia State Clearinghouse

DATE: 4/17/97

SUBJECT: Executive Order 12372 Review

PROJECT: JPN: Impact Wetlands / Construct Terminal

STATE ID: GA970320002

FEDERAL ID: 970003520

The State level review of the above referenced Public Notice/Permit Request has been completed. This request has been found to be consistent with State goals, policies, plans, objectives, and programs, with which the State is concerned.

#### Additional Comments:

The applicant is advised of enclosed comments from the Atlanta Regional Commission.

TR/ds

ENCL: Atlanta Regional Commission, w/ enclosures, April 14, 1997

Form SV-4  
January 1995

APR 21 1997

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

50 YEARS 1947-1997  
of Regional Cooperation, Leadership & Planning



April 14, 1997

Mr. Edward B. Johnson, Jr., Acting Chief  
North Area Section, Savannah District, Corps of Engineers  
3485 North Desert Drive, Building 2, Suite 102  
Atlanta, GA. 30344

RE: CSX Application for Corps Permit for Intermodal Facility (970003520)

Dear Mr. Johnson:

The ARC staff appreciates receiving notice of the application by CSX for a Corps of Engineers permit allowing disturbance of wetlands for construction of an intermodal facility in South Fulton County.

In September, 1996, the Commission reviewed this proposed intermodal facility under Georgia's Development of Regional Impact process and found the proposed facility was not in the best interest of the State at that time. There were a number of concerns including issues related to protection of the Line Creek Small Water Supply Watershed because Line Creek provides drinking water for Fayette County. In March, 1997, CSX came back to ARC for reconsideration based on a number of studies and additional information they had compiled since the September review.

Based on the additional studies and information, the Commission found the proposed development to be in the best interest of the State with a number of conditions. Enclosed is a copy of the Commission's March, 1997 resolution. You will note that the conditions include keeping the impervious surface at no more than 25 percent of the entire site (entire site is 500 acres), controlling the quantity and quality of stormwater runoff to pre-development levels, and working with the City of Fairburn and Fulton County to enforce the traffic management plan for tractor-trailer vehicles to ensure use of local streets is discouraged.

For information, the ARC staff also recommended to Fulton County that if the development proceeds, a monitoring program be required.

Enclosed with the resolution is information from the ARC staff review, including our estimate of pollutant loadings and recommended monitoring requirements.

Please let us know if we can provide anything further in this regard.

Sincerely,

A handwritten signature in dark ink, appearing to read "B. Rhea", is written over the word "Sincerely,".

Beverly Rhea, Review Coordinator

Enclosures

**RESOLUTION BY THE ATLANTA REGIONAL COMMISSION  
CONCERNING THE PROPOSED  
CSX SOUTH FULTON INTERMODAL FACILITY**

**WHEREAS**, in September, 1996, pursuant to the Georgia Planning Act of 1989 and the Georgia Department of Community Affairs (DCA) Rules for Review of Developments of Regional Impact (DRI's), the Atlanta Regional Commission reviewed an Intermodal Facility proposed by CSX Railroad in South Fulton County; and

**WHEREAS**, the City of Fairburn, Fayette County, and Georgia Department of Transportation expressed concerns about the proposed CSX facility (see attached); and

**WHEREAS**, the ARC staff review raised concerns about the environmental impact of the proposed facility; and

**WHEREAS**, at the time of the September review there was not sufficient information available to address the resolution of some of the concerns which had been raised about the proposed DRI; most particularly potential impact on Line Creek; potential impact on air quality in the Atlanta Region; and potential impact on the surrounding communities; and

**WHEREAS**, based on the information available at that time, the Commission found that the DRI was not in the best interest of the State at that time; and

**WHEREAS**, CSX has provided additional information, studies, and plans in an effort to address the concerns raised in the September review; and

**WHEREAS**, the additional materials consist of air quality, noise, and traffic studies; plans for protection of Line Creek small water supply watershed, including limiting impervious surface to 25% of the site; agreement to improve the affected section of McLaren Road to industrial standards or as directed by the Fulton County Traffic Engineer or the City of Fairburn; and agreement to submit a traffic management plan for tractor-trailer vehicles to ensure use of local streets is discouraged; and

**WHEREAS**, Fulton County has requested that ARC reinstate the DRI review; and

**WHEREAS**, the ARC staff considers that the additional materials address the major concerns;

**NOW, THEREFORE, BE IT RESOLVED** that the Atlanta Regional Commission finds that the proposed CSX Intermodal Facility is in the best interest of the State.

**BE IT FURTHER RESOLVED** that this finding is conditioned on CSX continuing to keep the impervious surface at no more than 25 percent of the entire site and controlling the quantity and quality of stormwater runoff to pre-development levels and is also conditioned on CSX working with the City of Fairburn and Fulton County to enforce the traffic management plan for tractor-trailer vehicles to ensure use of local streets is discouraged.

**CSX Intermodal Application for Corps Permit  
ARC Environmental Planning Division Review Comments**

DNR Protection Criteria

The proposed project site is located in the Line Creek Water Supply Watershed. Under DNR watershed protection criteria, the Line Creek Watershed is a small water supply watershed. If the application is approved, stream location and restoration/enhancement activities will alter the hydrology of the site. As a result, the site should be reevaluated for all perennial flowing streams after any proposed mitigation activities occur. Under DNR minimum planning criteria, sites located within a small water supply watershed that include perennial flowing streams must adhere to the following:

1. A buffer shall be maintained for a distance of 50 feet on both sides of the stream as measured from the stream banks.
2. No impervious surface shall be constructed within a 75 foot setback area on both sides of the stream as measured from the stream banks.
3. Septic tanks and septic tank drainfields are prohibited in the setback area of (2) above.
4. The impervious surface area, including all public and private structures, utilities, or facilities, of the entire water supply watershed shall be limited to twenty-five (25) per cent, or existing use, whichever is greater.
5. New facilities which handle hazardous materials of the types and amounts determined by the Department of Natural Resources, shall perform their operations on impermeable surfaces having spill and leak collection systems as prescribed by the Department of Natural Resources.

Flooding

Areas within the proposed project site are located within the 100 year floodplain. Steps should be taken by Fulton County to mitigate potential impacts on these floodplains. The Atlanta Regional Commission's Regional Development Plan notes that "all structures that can be damaged or land uses that can impede flood waters or reduce storage volume must be built outside the intermediate region (one percent) flood limits (i.e., outside the 100-year flood limit), with the exception that a stream crossing may vary from this policy, if constructed so as to permit passage of a 100-year flood with minimum feasible flow impedance, storage volume reduction, and upstream or downstream erosion or deposition."

Storm Water / Water Quality

Water quality in Line Creek can be impacted without storm water pollution controls. The amount of pollutants that will be produced after construction of the proposed CSX Intermodal Freight Facility 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	TSS	Zinc	Lead
Industrial (500.0ac)	725.0	9620.0	64,000.0	397,500	830.0	105.0

If the application is approved, Fulton County 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).

#### CSX Structural Storm Water Pollution Controls

Fulton County should 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 location, construction and design details and all engineering calculations for all storm water quality control measures. Atlanta Regional Commission staff recommends that the County require that any structural controls be maintained at an 80% - 90% total suspended solids removal efficiency.

The Plan should also include a monitoring program to ensure storm water pollution control facilities function properly. Atlanta Regional Commission recommends that structural controls be designed to accommodate the installation, operation and maintenance of automatic equipment at inlet and outlet locations for the monitoring of flow rates and water quality. It is recommended that the monitoring program consists of the following minimum elements:

- ♦ monitoring of four storms per year (1 per quarter);
- ♦ collection of a flow weighted composite of the inflow to the structure during the entire storm event;
- ♦ collection of a flow weighted composite of the outflow from the structure - the sampling period should include the peak outflow resulting from the storm event;
- ♦ analysis of inflow and outflow flow weighted composite samples for biochemical oxygen demand (BOD), total suspended solids (TSS), zinc, lead, total phosphorus (TP) and total nitrogen (TKN & NO<sub>3</sub>); and,
- ♦ collection of grab samples at the inlet and outlet locations during the periods of peak inflow and outflow for pH, dissolved oxygen (D.O.) and fecal coliform bacteria.

The County's Engineering Department should finalize the number and size of storms to be monitored as well as who should be responsible for conducting the monitoring. Monitoring should be conducted at the developer's and owner's expense. Analysis should conform to EPA standards. Specific monitoring procedures and parameters analyzed may change in the future based on continuing storm water runoff and water quality studies.

The storm water plan should require the developer to submit a detailed, long-term schedule for inspection and maintenance of the storm facilities. This schedule should describe all maintenance and inspection requirements and persons responsible for performing maintenance and inspection activities. These provisions and the monitoring program should be included in a formal, legally binding maintenance agreement between the County and the responsible party.

In addition to inspections required in the storm water management plan, the formal maintenance agreement between the developer and Fulton County should allow for periodic inspections of the storm water facilities to be conducted by appropriate County personnel. If inadequate maintenance is observed, the responsible party should be notified and given a period of time to correct any deficiencies. If the party fails to respond, the County should be given the right to make necessary repairs and bill the responsible party.

The County should not release the site plans for development or issue any grading or construction permits until a storm water management plan has been approved, and a fully executed maintenance/monitoring agreement is in place.

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



Harry West  
Director

August 28, 1996

Hon. Mitch Skandalakis, Chairman  
Fulton County Commission  
141 Pryor Street  
Atlanta, GA. 30303

RE: Development of Regional Impact Review  
CSX Intermodal Facility

Dear Chairman Skandalakis:

I am writing to let you know that our Development of Regional Impact Review of the proposed CSX Intermodal Facility will be delayed. During the review a number of concerns were raised which we have asked CSX to address. They have provided some but not all of the information we requested. We will be meeting with them concerning these matters and hope to complete the review not later than September 27, 1996.

I trust this will not present a problem as I understand that the Fulton County Commission will not be considering the project until October 2, 1996. I hope you will call me if you have any questions about this delay.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Harry West', is written over a circular stamp or seal.

Harry West  
Director

c Mr. Norman Underwood, Attorney for CSX  
Ms. Robyn MacDonald, Fulton County Development Services  
Mr. Rick Brooks, Georgia DCA



City of Fairburn

*"History Lives Here"*

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FACSIMILE TRANSMITTALTODAY'S DATE: 8-1-96DELIVER THE FOLLOWING TO: Beverly Rhea  
\_\_\_\_\_  
\_\_\_\_\_FROM: Anthony CoxMESSAGE: \_\_\_\_\_  
\_\_\_\_\_  
Letter enclosed in fax.  
Will follow with U.S. mail.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_NUMBER OF PAGES: 4 (Including Cover Sheet)



**City of Fairburn***"History Lives Here"*

August 1, 1996

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

Dear Ms. Rhea:

Enclosed are Fairburn's comments concerning the DRI review of the CSX Intermodal facility. The Mayor or I would be happy to further discuss our concerns about this proposed project.

Sincerely,

Anthony W. Cox  
City Administrator

## **Developments Of Regional Impact Comments From Affected Parties**

**CSX Intermodal Facility**

**Project ID** \_\_\_\_\_

**Name of commenting organization:** City of Fairburn

**Address:** P O Box 145, Fairburn, GA 30213

**Contact:** Anthony W. Cox, City Administrator

**Phone:** 770-964-2244

**Do you believe your jurisdiction will be affected by the proposed development** Yes No

**There are several points about this development that are of concern to Fairburn.**

First, the application is inaccurate to the extent that approximately 16 acres of the project are actually located within the corporate limits of Fairburn. We are more directly impacted than merely being adjacent to the project, portions of the project site are within our boundaries. We do not have detailed plans to determine if the proposed portion(s) of the project within our jurisdiction are in compliance with existing zoning and development regulations.

**The largest impact to Fairburn will be traffic. Specific traffic issues are:**

- Large volumes of truck traffic will be directed to the I-85 / Hwy. 74 interchange. This exit is already severely overcrowded at peak hours. We have expressed concerns to the DOT about public safety at this intersection due to overcrowding. The CSX development will add to the traffic volume and will encourage additional transportation related development which will further compound the problem at this intersection.
- Significant volumes of heavy truck traffic through the center of the historic district (Hwy. 29) will have a negative impact on the City's attempt to maintain an active retail center with a historic theme.
- McLarin Road will be a major conduit for truck traffic from the development to Hwy. 74. This road is not designed to handle large volumes of heavy trucks. Degradation of the pavement quality and added congestion surrounding the existing businesses in the McLarin / Bohannon road area needs to be reviewed.
- Increased heavy truck traffic volume through Fairburn will increase the demand for police traffic enforcement and will increase number and severity of traffic accidents in Fairburn.
- The potential for trains to block railroad crossings during staging and "building" trains needs to be determined. Frequent and prolonged blockage of rail crossings would significantly impact the response times of Fire and Rescue personnel located on East Broad Street.

Issues of environmental impact need to be assessed. The impact on wetlands and the water table need to be determined. The level of noise, light, dust, and air pollution generated by the site needs to be assessed as well as the effectiveness of proposed mitigation efforts to control these factors.

We recommend that a study be undertaken to determine if many of the negative factors surrounding this development would be reduced by improvement of the I-85 / Hwy. 74 interchange and the construction of the new interchange at I-85 & Gullatt Road.

Form Completed by: A W. Cox, City Administrator

A. W. Cox

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



August 20, 1996

Mr. Norman Underwood, Attorney  
Troutman Sanders  
600 Peachtree Street, NE  
Atlanta, GA 30303

FAX TO 404-885-3900

RE: Development of Regional Impact  
CSX Intermodal Facility

Dear Mr. Underwood:

During our Development of Regional Impact (DRI) review of the proposed CSX Intermodal Facility proposed in South Fulton County, a number of concerns have been raised which we feel must be addressed before we can complete our review. The concerns are as follow:

1. Protection of the Line Creek Water Supply Watershed. The proposed development is located in a small (under 100 sq.mi.) water supply watershed under EPD's classification; therefore certain minimum standards are required for protection of water quality. These include vegetative buffers and setbacks on the perennial streams which exist on the property, special requirements for handling hazardous materials, and limits on the amount of impervious surface allowed in the watershed.
2. Impact on traffic. There is concern about the number of truck trips that will be generated by the facility and how those trucks will impact the capacity of existing roads, whether some of the existing roads can handle the weight of the trucks, how the increased truck traffic will affect existing businesses and the historic district (Highway 29) of Fairburn, and whether there will be increased vehicular delays at grade crossings as the trains approach and leave the facility, which also could impact public safety services.
3. Analysis of the facility to ensure consistency with State air quality goals. Additional truck trips, locomotive activity, and yard operations are likely to generate emissions that currently are regulated in the 13-county non-attainment area in order to comply with air quality standards.
4. Further analysis of the air quality impacts associated with vehicular traffic delays that could occur at railroad grade crossings due to the increased number of trains, train length, and train speed as the trains approach and leave the intermodal facility.
5. CSX's intention concerning the 16 acres of the project site which are located in the City of Fairburn.



Mr. Underwood  
August 20, 1996  
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Our staff is available to meet with you if that would be helpful in addressing these issues. We would appreciate receiving a response as soon as possible in order not to delay our finding.

Sincerely,

A handwritten signature in cursive script, reading 'Beverly Rhea', is positioned above the typed name.

Beverly Rhea  
Review Coordinator

c Ms. Nancy Leathers  
Ms. Robyn MacDonald  
Mr. Paul Radford

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

November 28, 1996

Dear Ms. Rhea,

I am writing to you to voice my opposition to the planned CSX intermodal facility here in Fairburn, Georgia. They have applied for their PDN and I am deeply concerned over the complete disregard CSX has shown concerning the Clean Air and Clean Water Standards. As these standards are enacted for the safety and welfare of all, I ask for your help in making sure that these regulations are enforced.

It has recently come to my attention that a survey submitted by CSX is biased, inaccurate, and NOT ENFORCEABLE under the State Implementation Plan (SIP). Further, the Tennessee based consultants, Holton Environmental Associates, Inc., who "researched" the survey for CSX, has NO LEGAL INPUT over the approval for the permit. As the Corps has the responsibility for the conformity determination, we are alarmed by the misleading numbers provided by CSX. The "75,000,000 miles per year" estimated reduction, is a ludicrous statement. The Hulsey yard will still be in operation and continue to operate 1000 trucks a day out of that facility. They are projecting 400 trucks a day at Fairburn. The figures don't add up. Also, the survey fails on another major point, the guidelines are not taking into consideration the 13 county non-attainment area.

Further more the Head Waters of Line Creek are in grave DANGER! Line Creek is on the 303(d) list for toxicity. This is a guidance provided by the USEPA. This means that the water quality standards are not being met and designated uses are supported or not fully supported. Georgia is implementing a water shed approach to water protection through river basin management planning. This approach is the foundation for implementation of pollution reduction strategies in Georgia. Line Creek is the highest priority water and will require resources to complete actions and insure that standards are achieved. Thus further development of Line Creek will exacerbate the problem.

South Fulton County is already besieged by industry's polluting our air and water. Currently there are 5 major industries within a 5 mile radius of the proposed CSX facility. CSX has NEVER mentioned the SIP, nor do they want us to!

Sincerely,

*Roy A. Jan*  
Councilman City of Fairburn