

The Northeast Georgia Regional Commission (NEGRC) has completed its review of the following Development of Regional Impact (DRI). This report contains the NEGRC’s assessment of how the proposed project relates to the policies, programs, and projects articulated in the Regional Plan and Regional Resource Plan. Also included is an assessment of likely interjurisdictional impacts resulting from the proposed development, as well as all comments received from identified affected parties and others during the fifteen-day comment period.

The materials presented in this report are purely advisory and under no circumstances should be considered as binding or infringing upon the host jurisdiction’s right to determine for itself the appropriateness of development within its boundaries.

Transmittal of this DRI report officially completes the DRI process. The submitting local government may proceed with whatever final official actions it deems appropriate regarding the proposed project, but it is encouraged to take the materials presented in the DRI report into consideration when rendering its decision.

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<b>Project I.D.:</b>	DRI #3353
<b>Name of Project:</b>	558 West Broad Street
<b>Name of Host Jurisdiction:</b>	Athens-Clarke County

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### Background

DRI review was initiated following the developer’s request for a rezoning from Athens-Clarke County. The current zoning is C-D (Downtown) and the proposed zoning is C-D (Downtown) (PD). Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 7/26/21 – 8/10/21.

### Proposed Development

Smith Planning Group, on behalf of the developer, is proposing construction of a 434,211 square foot mixed-use project on a 3.75-acre site (parcel #: 171A4 B016, 171A4 B017, 171A4 B018, 171A4 B011, 171A4 B009) at 558 West Broad Street in Athens-Clarke County. The proposal consists of 12,477-SF of commercial plus 340 residential units. The site includes stormwater management infrastructure (contained within the footprint of the building), and 525 parking spaces in a deck. The project would be completed in one phase with an estimated completion date in 2023. Currently, the site consists of a fraternity house, parking lots, two single-family houses, and a hotel.

### Compatibility with Existing Plans

The site is identified as “Downtown” on the Athens-Clarke County Comprehensive Plan’s Future Land Use Map (dated 6/05/2018). C-D is listed as a compatible zone in this area, and encourages high-density multi-family construction. Parking structures with commercial uses on the ground floor are also encouraged and off-street commercial parking is discouraged. The Plan also strongly encourages strict design requirements to protect the historic integrity of downtown. Additionally, the Plan includes goals like increasing the range of transportation options available to residents, implementing “Complete Streets,” creating a vibrant downtown

with less vehicles and more open space, re-examining parking ratios, and increasing the amount of affordable housing.

The proposal appears consistent with the comprehensive plan's recommendations for the area, including building high-density multi-family housing, substituting parking decks for surface lots, and placing commercial space on the ground floor. The submitted illustration appears to show a façade that mixes several colors of brick and metal or fiber cement. Brick facades are highly consistent with the historic character of the downtown, but fiber cement and metal are inconsistent. Traditional materials are recommended to align the proposal with the historic character of the neighborhood.

The inclusion of 525 parking spaces conflicts with the Comprehensive Plan's recommendations to create a vibrant downtown with less vehicles and to build affordable housing. While stacked parking is a superior and more efficient method to provide parking than surface parking lots, extensive amounts of parking raise the cost of the project and enable auto-dependency—both of which are at odds with local and regional plans that include affordable housing and multi-modal transportation as goals. Given that this is a highly walkable urban neighborhood, the focus should be on building with walking, biking, and transit in mind. In these kinds of neighborhoods, parking should be provided at one space per unit or less. Parking demand should be managed through more creative means like sharing spaces between compatible uses (i.e. letting a day-time business and a residence that will be primarily used outside of business hours share parking). Substituting some car spaces for bike parking is also recommended to improve the range of transportation options available to residents. Additionally, the price of a parking spot should be unbundled from the rent so that those who do not own cars are not forced into subsidizing car ownership.

The site is identified as "Developed" on the Northeast Georgia Regional Plan's Regional Land Use Map (dated 6/7/2018). The Regional Plan recommends development that matches the region's workforce, prices in the lifecycle cost of infrastructure, creates a sense of place, builds a compact development pattern on existing infrastructure, creates diverse and affordable housing, and compliments existing and planned transportation options—especially non-automobile transportation modes. The project meets the recommendation to build in a compact development pattern on an infill location that makes use of existing infrastructure. However, additional bike parking, reduced car parking, and street improvements are necessary to fully meet the recommendation to compliment non-automobile transportation modes. While the project does add needed housing, this type of product typically does not do a good job of delivering affordable or diverse housing options. There are better ways to add diverse and affordable housing than the 5-over-1 podium blockbusters, such as the approach shown in Attachment A.

### **Potential Interjurisdictional Impacts**

The applicant states that the project is unlikely to affect any of the environmental quality factors identified on the DRI Additional Form, including water supply watersheds, groundwater recharge areas, wetlands, protected mountain and river corridors, floodplains, historic resources, and other environmentally sensitive resources. An estimated 95% of the site would be covered in impervious surfaces, and an onsite underground retention facility is planned to manage stormwater runoff. A green roof is also planned.

The National Wetland Inventory (NWI) identifies zero acres of wetlands onsite and 38 acres of wetlands within one mile of the site. The Northeast Georgia Regional Plan's Conservation and Development Map (dated 7/19/2018) identifies zero acres of "Conservation" land onsite and 1,151 acres of "Conservation" land within one mile of the site. Much of this acreage (up to 1,017 acres) is part of the Northeast Georgia Green Infrastructure Network, as identified in the Northeast Georgia Resource Management Plan for Regionally

Important Resources (dated 8/7/2018). Multiple Regionally Important Resource sites are identified within one mile of the proposed site, including the Church-Waddell-Brumby House, Lyndon House, Morton Theatre, T.R.R. Cobb House, Taylor-Grady House, Oconee Hill Cemetery, the Athens Line, the Oconee River Greenway System, and the Firefly Trail. This project is not expected to negatively impact these sites.

The site plan proposes a large underground stormwater management facility and a green roof to manage stormwater runoff. This management approach may create unique maintenance needs and those needs should be accounted for in the design and operation of the building. At minimum, the project should be in accordance with the latest edition of the Georgia Stormwater Management Manual (Blue Book) and meet all relevant EPD requirements.

A&R Engineering submitted a traffic study which estimates that the proposal would generate 2,129 trips per day, including 126 AM peak hour trips and 169 PM peak hour trips. The site would be accessed via two driveways (one on N Finley Street and one on N Newton Street) and no infrastructure improvements are recommended. The study makes no mention of walking, biking, or public transit despite the downtown location of the project; it's unclear whether it accurately accounts for the many non-automobile trips that should be anticipated for such a central site. The site plans show the existing sidewalk surrounding the block will be maintained, with added street trees and landscaping, and that pedestrian and bicycle activity could be supported via proposed pedestrian access points around all sides of the structure. Bicycle parking and other design elements to support alternative modes of transportation should be incorporated into the final product.

The project would be served by Athens-Clarke County's water and sewer systems with an estimated daily demand of 0.1029 MGD for each system. The applicant states that these demands can be covered by existing capacity. No water or sewer line extensions are anticipated. The applicant estimates the project would generate 243 tons of solid waste annually and that sufficient landfill capacity exists to handle this waste. No hazardous waste would be generated.

The applicant estimates that the project would be worth \$146,109,281 at build-out in 2023 and generate \$2,095,007 in annual local taxes. On a per-acre basis, the project would be worth \$38,962,475 and generate \$558,669 in tax revenue. Prior to approval, the County should measure the life cycle costs of the infrastructure needed to serve this project to ensure that they would not be committing to more maintenance expenses than the new tax revenue can cover.

# The Case for Missing Middle

From “Guiding Growth in Charleston’s Historic District” by Bevan & Liberatos



This image illustrates a 6-story “Texas donut” style mixed-use building wrapped around a parking garage. It is built to the property line and maximizes the allowable footprint.



This image illustrates 2-4 story (individual buildings vary in height) mixed-use development that meets the same bedroom/acre density as the image to the left, but does so with increased green space, decreased land area coverage, and porches to interact with the street. This option fits in better with the character of historic Charleston and provides a more engaging experience.

### **Comments from Affected Parties**

*Alan Hood, Airport Safety Data Program Manager, Georgia Department of Transportation*

The proposed a 434,211 square foot mixed-use project on a 3.75-acre site at 558 West Broad Street in Athens-Clarke County is 2.6 miles north west of Athens-Ben Epps Airport (AHN). It is outside the FAA approach and departure surfaces, and is outside airport compatible land use areas, and does not appear to impact the airport.

However, the proposed development is in proximity to a navigation facility and may impact the assurance of navigation signal reception, so studies are needed for the buildings and any cranes. Those submissions to the FAA for the buildings and any associated cranes may be done online at <https://oeaaa.faa.gov>. The FAA must be in receipt of the notifications, no later than 120 days prior to construction. The FAA will evaluate the potential impacts of the project on protected airspace associated with the airports and advise the proponent if any action is necessary.

Thank you for the opportunity to comment on the proposed development.