

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.

Project I.D.:	DRI #3563
Name of Project:	Georgia Square Mall Redevelopment
Name of Host Jurisdiction:	Athens-Clarke County

Background

DRI review was initiated following the developer’s request for a rezoning with variances from Athens-Clarke County initiated the review. The property would be rezoned from Commercial-General (C-G) to Commercial-General Planned Development (C-G PD). Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 01/20/22 – 02/04/22.

Proposed Development

Mark Jennings is proposing redevelopment of the existing Georgia Square Mall into a mixed-use development, including 986 multi-family units, 152 senior living units, 63,500 SF of retail, 28,500 SF of restaurant space, and re-use of 293,000 SF of existing commercial space on a 75-acre site (parcel numbers: 073 016, 073 016F, 073 016J, 073 016K, 073 016S, and 073 016T) at 3700 Atlanta Hwy in Athens-Clarke County. Additionally, one detention pond and 2,937 parking spaces would be constructed. According to the site plan, the project would be completed in eight phases with an estimated completion date in 2026. Phase One would include 136 housing units and demolition/renovation of the existing mall structure. Phase Two would include 52 housing units and 17,000 SF of retail/restaurant. Phase Three would include 216 housing units. Phase Four would include 248 housing units. Phase Five would include 80 housing units. Phase Six would include 76 housing units. Phase Seven would include 34,000 SF of retail/restaurant. Finally, Phase Eight would include 41,000 SF of grocery/retail/restaurant space. Currently, the site is a nearly defunct mall. Part of the existing structure would be demolished and replaced with parking lots.

Compatibility with Existing Plans

The site is identified as “General Business” and “Employment Center” on the Athens-Clarke County Comprehensive Plan’s Future Land Use Map (dated 06/13/2018). It is also categorized as “Retail Sales/Personal Services” on the Land Based Classification Standards Map in the Plan. The “General Business” use includes:

“Commercial areas that serve a variety of needs for the residents of the region. It is intended for small- and large-scale retailing and service uses that are auto-oriented, such as Atlanta Highway. Pedestrian-oriented design is particularly appropriate when these streets contain neighborhood-shopping areas or are adjacent to multifamily housing or residential neighborhoods. Pedestrian circulation in these centers is a primary concern, therefore, connectivity within and to surrounding areas should be encouraged.”

The area description also states that street-level facades should have a pedestrian scale and architecture, with buildings that are oriented towards tree-lined streets. Small and medium scale retail stores should frame the streets and pedestrian circulation should be prioritized over automobile access. Parking lots should not be located at the street front and shared parking should be encouraged. The Plan encourages infill housing in areas near commercial nodes.

The Plan describes the “Employment Center” category as “areas of industry, office, research parks, and flex-space mixed uses.” Housing is considered incompatible with the uses proposed for this area.

Aside from heavy industry, there appears to be considerable room to compatibly mix uses like offices with housing on this site. However, the proposal does not appear to meet the recommendations for the Plan’s “General Business” category. The proposal makes little effort to create an environment that is safe, comfortable, useful, and attractive for pedestrians, and it includes no connections to the adjacent neighborhoods that would assumedly serve as a critical source of business for commercial tenants. Rather than being built at a pedestrian scale, most of the proposed structures are scaled to fill an entire block without creating an interesting or inviting streetscape for pedestrians. Furthermore, the four-lane ring road would retain its existing configuration around most of the site—serving as a moat separating the property from connectivity to the adjacent community. The vast amount of surface parking that is projected for the site ensures that the design will continue to be auto-oriented, at the expense of pedestrians and place-making.

The site is identified as “Developing” on the Northeast Georgia Regional Plan’s Regional Land Use Map (dated 6/7/2018). It is also listed as an area with potential for redevelopment according to the Areas Requiring Special Attention Map in the Plan. Greyfield redevelopment is encouraged to create more neighborhood and pedestrian friendly places, housing choices, a sense of place, and multiple transportation options. 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 site plan shows limited attempts to create a pedestrian and neighborhood friendly design. Only the small restaurant area in Phase VII makes any attempt to create an attractive gathering place for people; overall, the site layout seems to create isolated pods of buildings that are surrounded by extensive areas of pavement and landscaped medians. The project would provide two types of housing: large multi-family structures and “active adult” units. However, the proposal fails to connect them to each other and rest of the development through any kind of meaningful multi-modal access. The plan actually proposes reducing the number of bike parking spaces required by local regulations. It is important to acknowledge this site has long-awaited

redevelopment and the project would likely increase the tax value of the site. However, a “suburban-retrofit” style development would likely increase the project’s value significantly while also better aligning it with the local and regional plans. It could become a kind of “downtown” for the west side of Athens where people love to gather and public events are held. In order to meet the recommendations of local and regional plans and suburban retrofit best practices, proposals for this site should convert the existing ring road from four lanes to two lanes with a protected two-way bicycle lane and parallel parking. Bike and pedestrian connections should be made to adjacent streets, like Cavalier Road, Cherokee Ridge, and Meeler Circle, as well as to properties like Akademia Brewing and the Meadowland apartment complex. An internal street network, with wide shady sidewalks and easy bike access, should also be established. The Avalon project, in Alpharetta, provides a nearby example of how to create an attractive main street for a project like this. It’s also recommended the project be divided into walkable blocks that are populated with buildings that engage people through frequent doors and windows along the sidewalk. Shallow “liner” buildings can be used to frame these streets and provide the feel of an attractive “urban village.” These smaller commercial spaces are especially attractive to local businesses. The proposal should provide a variety of housing at different price points. These kinds of sites can add many of the “Missing Middle Housing” types like townhomes, live/work units, quadplexes, and 10-20 unit multi-plexes. One of the primary obstacles to this kind of redevelopment is excessive parking. Too much parking leads to excessive stormwater runoff, crowds out value-producing buildings, and encourages automobile dependency. Although the site is currently characterized by an over-abundance of parking, existing parking requirements would mandate additional parking if the proposal moved forward. The total amount of parking should be significantly reduced and stacked, on-street, or shared parking should be used to reduce the amount of surface space devoted to parking. Parking decks should be shielded from the street where possible. If the entire site cannot be developed at the onset, then streets, utilities, and parking lots can be laid out in a way that allows for infill development, as it becomes feasible. This style of creative redesign may be necessary to successfully extend the site’s longevity for a significant period of time. As currently designed, the project appears to only align with the Regional Plan’s desire for infill development and the creation of affordable housing options.

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 72-73% of the site would be covered in impervious surfaces, and one large retention pond is planned to manage stormwater runoff. The site is almost completely covered in impervious surfaces in its current state. The applicant states that stormwater facilities, designed in accordance with the Georgia Stormwater Management Manual and Athens-Clarke County regulations, would be provided. Since the site is almost completely covered in impervious surfaces, any reduction would be an improvement for the management of stormwater. Significantly reducing the amount of surface parking is recommended to minimize stormwater runoff. Furthermore, the planned retention pond misses an opportunity to become an amenity for the site, as was done in Atlanta’s Old Fourth Ward Park. The developer should consider managing stormwater through multiple dual-purpose retention and amenity ponds that could serve as attractive value-adding anchors for multiple sections of the site. Low-impact design measures, like bioswales, rain gardens, green roofs, permeable paving, and other green infrastructure should be incorporated into the project design. 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.

The National Wetland Inventory (NWI) identifies zero acres of wetlands onsite and 90 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 351 acres of “Conservation” land within one mile of the site. This “Conservation” land includes 247 acres of Regionally Important Resource land within one mile of the site. No specific Regionally Important Resource sites are identified within one mile of the proposed site.

Kimley-Horn has performed a traffic study for the proposal that estimates the project would generate 8,462 daily trips, including 601 AM Peak Hour trips and 582 PM Peak Hour Trips. The study concludes that the adjacent roadway network is sufficient to handle these trips, although this is based on including the Georgia Dept. of Transportation’s future 2023 reconstruction of the nearby interchange between Atlanta Hwy and the Athens Loop, and the associated widening of Atlanta Hwy to eight lanes into its calculations. No new infrastructure is proposed for the site beyond the five existing entrances. However, as stated above, significant improvements are recommended by the NEGRC to improve bike and pedestrian accessibility. More importantly, the redevelopment of this site could generate significant ridership for Athens-Clarke County’s transit service. The site already has a bus stop, but the redevelopment application makes no mention of turning this site into a transit-friendly hub. Particularly with residential units targeted toward older populations, this project should not miss the opportunity to incorporate transit-friendly design elements.

The project would be served by the Athens-Clarke County water and sewer systems with an estimated daily demand of 0.31 MGD for water and 0.28 MGD for wastewater service. 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 5,857 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 \$426 million at build-out, in 2026, and generate \$10 million in annual local taxes. On a per-acre basis, the project would be worth approximately \$5.7 million and generate approximately \$133,000 in tax revenue. Prior to approval, the Unified Government 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. As stated above, the project would likely raise the value of the site, but a quality suburban retrofit project would likely provide even more tax value by minimizing negative space in favor of value-producing buildings and amenities.

Comments from Affected Parties

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

This proposed project is 7.3 miles west of the Athens-Ben Epps Airport (AHN), and is located outside of any FAA approach or departure surfaces, and airport compatible land use areas, and does not appear to impact the airport.

However, if any construction or construction equipment reaches 200’ AGL or more, an FAA Form 7460-1 must be submitted to the Federal Aviation Administration. That may be done online at <https://oeaaa.faa.gov>. The FAA must be in receipt of the notification, no later than 120 days prior to construction. The FAA will evaluate the potential impact 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.