

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 #3808
<b>Name of Project:</b>	Athens River Mill
<b>Name of Host Jurisdiction:</b>	Athens-Clarke County

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### Background

DRI review was initiated following developer’s request for rezoning from RM-2 (Mixed-Density Residential, parcel 171D2 G001) and C-G (Commercial General, parcel 171D2 G001A) to C-D (Commercial Downtown). Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 9/14/22–9/29/22.

### Proposed Development

Smith Planning Group is proposing construction of 407 residential units with 977 bedrooms and 8,700 square feet of commercial space on a 10.5-acre site in Athens-Clarke County. The site plan includes a 648-space parking deck, 100 additional surface parking spaces, and 245 bicycle parking spaces. Other site facilities include two gated vehicular entrances, multiple retaining walls, a trash shelter, and a stormwater management area. The site plan proposes a public river access area adjacent to the North Oconee River as well as a private amenity area near the site’s southern gate. Currently, the site is a 459-bedroom apartment complex that will be demolished. The proposed development is located at 199 Stone Mill Run, directly east of the University of Georgia and less than half a mile from downtown Athens in Athens-Clarke County. The parcel numbers are 171D2 G001 and 171D2 G001A. The project would be completed in one phase with an estimated completion date of 2025.

### Compatibility with Existing Plans

On the county’s Future Land Use Map (dated 3/29/2018), parcel 171D2 G001, which is the site’s interior parcel, is identified as “Mixed- Density Residential,” and parcel 171D2 G001A, which is the parcel facing the street, is identified as “General Business.” The “Mixed-Density Residential” land use is described in the plan as

residential areas “where higher density residential development is allowed and intended” and where “limited nonresidential uses designed at a neighborhood scale may be incorporated.” The “General Business” land use is described in the plan as “commercial areas that serve a variety of needs for the residents of the region.” The proposed development is compatible with the “Mixed-Density Residential” land use, as the intended land use is fully compatible with all residential descriptors of the definition, and the commercial portion of the proposed site fits the description of “neighborhood scale nonresidential use.” To be further compatible with this land-use description, commercial uses in the “Mixed-Density Residential” portion of the site should be oriented towards the street, include streetscape enhancements, be compatible with public transit, and not include auto-oriented uses. The portion of the proposed site facing the street, which is located within a parcel designated as “General Business,” is mostly compatible with its corresponding future land use description. The commercial portion of the site fits this description, as it is a commercial area for “small- and large-scale retailing and service uses.” While the “General Business” designation states that these areas should be primarily auto-oriented, the site plan features pedestrian-oriented design in publicly accessible areas, which is encouraged within this land designation.

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 applicant states that the regional workforce is sufficient to fill the demand created by the proposed project. No information was provided in the application that would enable determination of whether the proposal prices in the lifecycle cost of infrastructure. The project would create a sense of place by incorporating access to the North Oconee River into the site design and by providing amenity areas for residents. The project would be very compact with an approximate population density of 93 residents per acre. The project would be built on existing sewer and water infrastructure, as the project would replace an existing development that is already serviced by public sewer and water, and the applicant states that the proposed site will not require any extensions to water or sewer lines. The proposed site does encourage non-automotive transportation modes by incorporating 245 bike storage spaces into the site design. Additionally, the site is located along existing public transit routes. However, to encourage bicycle usage for non-residents visiting the site, the developer should also include bicycle parking facilities around the commercial building and by the North Oconee River access point.

The application and site plan do not give any indication of the affordability of the proposed apartment units, but they do provide apartment size options ranging from one to five bedrooms, which will provide at least a range of rental price points and unit options. However, the amenities shown in the floor plans indicate that this proposed development will be large-scale student housing, which has historically been marketed at high rental rates in Athens. Athens-Clarke County should compare the anticipated rent of apartments in this proposed development to the area’s median income to determine whether they will be affordable to local residents. Similarly, the local government should compare the anticipated rent of the new apartments to the rent of the existing apartments. If the apartments are deemed unaffordable to most Athens-Clarke County residents or if the redevelopment results in the loss of affordable units, Athens-Clarke County should consider working with the property owner to incorporate affordable units into the proposed development.

### **Potential Interjurisdictional Impacts**

The applicant states that the project is likely to impact a protected river corridor and floodplains on site. The east portion of the site surrounding the North Oconee River is considered a floodplain. However, the developer is planning on removing all existing impervious surfaces within this floodplain except for a publicly

accessible river access area. The site plan indicates that no structures are proposed within Athens-Clarke County's required 100-foot riparian buffer. Additionally, portions of the North Oconee River downstream of the project site are included in the Nationwide Rivers Inventory (NRI) and could be impacted by the proposed development. The segment of the North Oconee River adjacent to the site is not considered an NRI river segment. It is important that the developer use BMPs to prevent negative impacts to the river, the protected riparian corridor, and the downstream NRI segment, during construction and in the completed project. The applicant states that the site will not likely affect all other environmental quality factors included in the DRI application, which include water supply watersheds, significant ground water recharge areas, wetlands, protected mountains, and historic resources.

The National Wetland Inventory (NWI) identifies 1.6 wetland acres onsite and 45 wetland acres are located within one mile of the site. The Northeast Georgia Regional Plan's Conservation and Development Map (dated 7/19/2018) identifies the entire 10.5 acre site as "Conservation" land and 2,059 acres of "Conservation" land within one mile of the site. All "Conservation" land onsite is identified as Regionally Important Resource land onsite and 1,923 acres of RIR land is within one mile of the site. This acreage 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). The project site is within 1 mile of multiple Regionally Important Resources including the Church-Waddel-Brumby House, the Lyndon House, the Morton Theatre, the T.R.R. Cobb House, the Oconee Hill Cemetery, the Athens Line, and the Oconee River Greenway System. The proposal should be designed to minimize disruption to these Regionally Important Resource and to provide appropriate access to them. The proposal should be designed to minimize disruption to the existing streams, associated wetlands, and floodplains to avoid future erosion, flooding, and degraded water quality onsite and downstream from the site. Low impact design measures, like bioswales, rain gardens, 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 applicant has not completed a recent traffic study for the site. The applicant included the results of the traffic study conducted for the existing multi-family development, which projected that the existing site would generate 2,762 new daily trips, including 84 AM peak hour trips and 242 PM peak hour trips. However, these projections most likely underestimate new daily and peak hour trips for the proposed new project, since 8,700 square feet of commercial space would be added and the number of bedrooms on the site would increase from 459 to 977. It is recommended that a new traffic study be performed so that Athens-Clarke County can more accurately determine potential effects generated by the proposed project.

The project would be served by the Athens-Clarke County water and sewer systems with an estimated daily demand of 0.1442 MGD for each system. The applicant states that these demands can be covered by existing capacity. No water or sewer line extensions are anticipated. An estimated 48% of the site would be covered in impervious surfaces. According to the applicant, stormwater would be managed through on-site infiltration best management practices. The applicant estimates the project would generate 1,243 tons of solid waste annually and that sufficient landfill capacity exists to handle this waste. According to the Northeast Georgia Regional Solid Waste Authority's Regional Solid Waste Management Plan (2021-2031), most municipal solid waste (MSW) generated in Athens-Clarke County stays within the county for disposal. The applicant states that no hazardous waste would be generated.

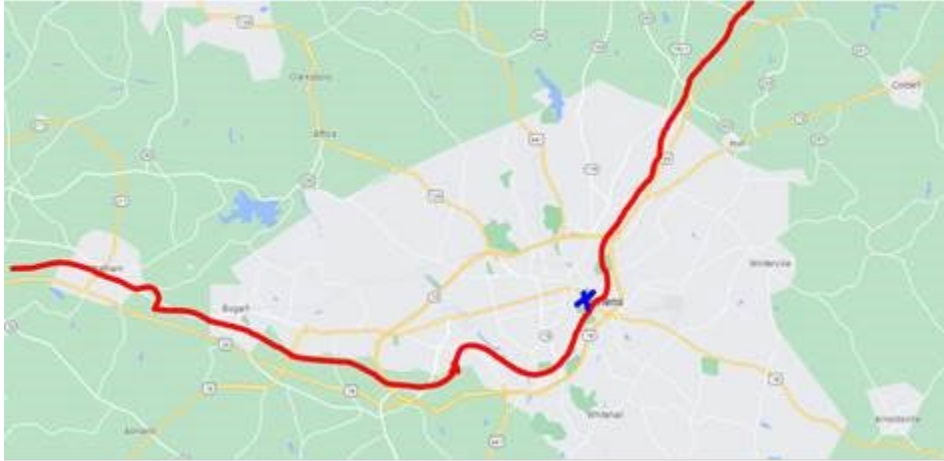
The applicant estimates that the project would be worth \$125,000,000 at build-out in 2025 and generate \$2,000,000 in annual local taxes. On a per-acre basis, the project would be worth approximately \$1,190,500 and

generate approximately \$190,500 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.

### Comments from Affected Parties

*Parker Niebauer, D1TO Traffic Operations Supervisor, Georgia Department of Transportation*

The report does not show projected trips. Looking at the proposed development, it would more than double the existing trips. The development is off-system but would increase traffic at SR 10/US 78 BUS @ Williams St. There is no dedicated WB left turn lane at this intersection. My thoughts are any trips from the area below the red line would result in WB lefts at the intersection of SR 10 at Williams St. The site is near the blue "X."



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

This proposed development is 1.8 miles from the Athens-Ben Epps Airport (AHN), and is located under the approach and departure surfaces, and outside of the airport compatible land use areas, and does not appear to impact the airport.

However, if any construction or construction equipment reaches 180' 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.