



MEMO

To: Keyetta Holmes
Director Office of Zoning and Development

From: Caleb Racicot
Project Manager ATL Zoning 2.0 Consultant Team

Date: 03/12/2025 with pg. 2 as amended 3/31/2025

RE: Recommended RG-2, RG-3 Conversions

INTRODUCTION

Since the release of the revised draft Module I of Atlanta Zoning 2.0 and the associated district conversions on November 12, 2024, numerous public comments have been received opposing certain aspects of the proposed conversion methodology for existing RG-2 and RG-3 zoning districts, particularly as applied to specific site types

As currently proposed, the conversions are outlined in the table below, with specific standards that were a focus of public comments shown in red:

Focus of comments	Existing RG-2 Sites		Existing RG-3 Sites	
	RG-2	UG3A-R2	RG-3	UG3A-RX1
Base FAR	0.348 (net floor area) + unlimited single-unit	1.0 max. (gross floor area)	0.696 + unlimited single-unit	1.0 max. (gross floor area)
Lot Area	1,000 SF min.	1,000 SF min.	1,000 SF min.	1,000 SF min.
Units per Lot	Unlimited See FAR	Unlimited	See FAR	Unlimited
Height	Unlimited	3 stories max.	Unlimited	3 stories max.
Facade Width	Unlimited	275' max.	Unlimited	275' min.
Front Setback	40' min. or block avg., 5' min. BLO	5' min. 15' max.	40' min. or block avg., 5' min. BLO	5' min. 15' max.
Side Setback	7' min. or formula	0' min.	7' or formula	0' min.
Rear Setback	7' min. or formula	0' min.	7' min. or formula	0' min.
Transition (next to R1-R5 or equiv.)	20' min. yard, height plane	20' min. yard, height plane	20' min. yard, height plane	20' min. yard, height plane
Building Coverage	100% max.	85% max.	100% max.	85% max.

In addition to concerns about the specific standards in red above, many comments expressed a desire to preserve the “residential” character and existing tree cover of small RG-2 and RG-3 sites, which are often embedded within neighborhoods. Notable areas of concern include St. Charles and Greenwood Avenues in Virginia Highland (RG-2) and various locations within Ansley Park (RG-3).

A thorough comparison of the existing and proposed zoning reveals that most public concerns stem from a misunderstanding of what is already allowed on RG-2 and RG-3 properties. The one notable exception is the proposed side and rear setbacks, which are reduced in the UG3A Form District compared to current standards.

METHODOLOGY

In response to the significant number of public comments received, the Consultant Team explored potential methods for converting the RG-2 and RG-3 zoning districts, taking into account the following considerations:

- The conversion should address the impacts on both small RG-2 and RG-3 sites embedded in neighborhoods, as well as larger RG-2 and RG-3 sites in other locations. 002
- The conversion should include a methodology for one-to-one conversions that can apply citywide, rather than arbitrarily converting districts differently in one neighborhood compared to another.
- The conversion should not reduce current property rights with regard to floor area ratio (FAR), building height, or other density controls.

Based on these considerations, the Consultant Team used the following methodology.

STEP 1: LOT SIZE NATURAL BREAKS ANALYSIS

Description: Use ArcGIS Pro to identify patterns related to the distribution of RG-2 and RG-3 lots based on size across the city.

Apply a six-class natural breaks classification to group similar lot sizes while maximizing differences between classes. This method helps identify natural groupings in the data by detecting gaps in the distribution.

Analyze the typical lot size within the smallest class to determine the characteristics of the smallest RG-2 and RG-3 lots found within neighborhoods.

Findings: Findings of the “natural breaks” lot size analysis are below:

	Mean Lot Size (rounded)	Smallest Lot Size Class (rounded)	Percent of Similarly Zoned Lots
RG-2	121,500 SF	Up to 24,000 SF	64%
RG-3	89,200 SF	Up 22,300 SF	63%
RG-2 and RG-3	76,300 SF	Up to 20,800	87%

STEP 2: LOT SIZE SPATIAL ANALYSIS

Description: Use ArcGIS Pro to analyze the spatial distribution patterns of RG-2 and RG-3 lots across the city to determine whether smaller lots are clustered or randomly scattered.

Run “Spatial Autocorrelation (Global Moran’s I)” to measure how similar or different nearby lot sizes are.

Run “Hot Spots Analysis” to show where small or large lots are clustered.

Run “Cluster and Outlier Analysis (Anselin Local Moran’s I)” to show clusters of similar values (e.g., areas where lot sizes are consistently small or large) and outliers (e.g., a large lot surrounded by small lots or vice versa).

Findings: Both RG-2 and RG-3 lots are clustered into groups of similar sizes. As a result, converting clustered RG-2 or RG-3 lots based on the lot sizes in each cluster would minimize outliers.

001

With regard to RG-2 and RG-2 lots embedded within neighborhoods, there is no strong correlation between lot size clusters and the proposed Plan Development Patterns. As a result, the use of Development Patterns to establish conversion methodology is not recommended.

#001

Posted by **Jennifer Friese** on **04/15/2025** at **8:54am** [Comment ID: 1187] - [Link](#)

Suggestion

Agree: 0, Disagree: 0

Please consider a conversion of these outlier Large Embedded RG2 and RG3 lots to N6. Embedded meaning lots that are within an R1-R4 neighborhood with the only egress from a residential street.

Reply by **Jennifer Friese** on **04/15/2025** at **8:56am** [Comment ID: 1189] - [Link](#)

Suggestion

Agree: 0, Disagree: 0

N6A

Reply by **SiteAdmin** on **04/15/2025** at **10:55am** [Comment ID: 1196] - [Link](#)

Answer

Agree: 0, Disagree: 0

Please email us with specific sites so we can study them. Thanks.

#002

Posted by **Jennifer Friese** on **04/15/2025** at **8:49am** [Comment ID: 1186] - [Link](#)

Suggestion

Agree: 0, Disagree: 0

Please also consider the conversion of Embedded Large lot RG2 and RG3 - these internal lots were often the result of many small lots merged together. Many of these multi-family developments match the intent of RG pattern to fit its surroundings at a neighborhood scale. The complicated yet beautiful side set back formula $D=4+s+L/10$ has kept green space between these developments and the street and single family houses that surround them. Most are results of robust community input to ensure no negative impact to surrounding homes and they are shining examples of how increased people density does not have to equate with increased physical density. Please consider N6 for these lots so future development respects the neighborhood scale setbacks

Reply by **Jennifer Friese** on **04/15/2025** at **8:55am** [Comment ID: 1188] - [Link](#)

Suggestion

Agree: 0, Disagree: 0

N6A

Reply by **SiteAdmin** on **04/15/2025** at **10:54am** [Comment ID: 1195] - [Link](#)

Answer

Agree: 0, Disagree: 0

If possible, can you please email atlzoning2@atlantaga.gov with specific parcels you are thinking of. The conversions must apply the same in every part of the city and we'd need to study them in detail.

STEP 3: CONVERSION ALTERNATIVES

Description: Identify proposed Form Districts that are similar to UG3A in terms of allowed density but better reflect the existing “residential character” found in neighborhoods with RG-2 and RG-3 lots.

Findings: The following Form Districts are similar to UG3A in terms of building height and the types of development they support:

	UG3A	N5A	N5B	N6A
Base FAR	1.0 max. (gross floor area)	None (Form-based)	None (Form-based)	1.0 max. (gross floor area)
Lot Area	1,000 SF min.	2,000 SF min.	2,000 SF min.	2,000 SF min.
Units per Lot	Unlimited	6	12	Unlimited
Height	3 stories max.	2.5 stories max.	3 stories max.	3 stories max.
Facade Width	275' max.	40' max.	40' max.	100' min.
Front Setback	5' min. 15' max.	Block avg.	Block avg.	Block avg.
Side Setback	0' min.	3' min. one side, 10' min. cumulative	5' min.	10' min.
Rear Setback	0' min.	7' min.	7' min.	15' min.
Transition (next to R1-R5 or equiv.)	20' min. yard, height plane	See side, rear setbacks	See side, rear setbacks	See side, rear setbacks
Building Coverage	003 ^{ted} Unlimited 85%	65%	70%	75%

All Neighborhood-Scale (N-) districts better match the existing patterns of smaller RG-2 and RG-3 lots in neighborhoods compared to the UG3A district. 004

N5A and N5B are particularly suitable for smaller lots due to their shallow side setbacks.”

The limits on the number of units per lot could pose a challenge for smaller RG-2 and RG-3 lots that already contain multiple units.

STEP 4: EXISTING ENTITLEMENT ANALYSIS

Description: Analyze the existing RG-2 and RG-3 standards to determine:

- The smallest lot size required to accommodate 6 and 12 multifamily units, which correspond to the potential N5A and N5B conversions. Assess the maximum allowed floor area and its impact on both small and large multifamily units.
- The number of single-family (single-unit) dwellings allowed under the RG-2/RG-3 and N5A/5B conversions.

This will help the Consultant Team avoid proposing standards that may result in down-zoning.

Findings: **Multifamily Analysis**

	RG-2	RG-3
Existing		
FAR	0.348	0.696
Floor area per acre	15,158.88	30,317.76
Avg. 750 SF Unit		
Units per acre	20.21	40.42
Min. lot size 6 units (N5A)	12,931.03	6,465.52
Lots < min. lot size	60%	66%

#003

Posted by **Jennifer Friese** on **03/31/2025** at **9:56am** [Comment ID: 1128] - [Link](#)

Suggestion

Agree: 0, Disagree: 0

I believe this should read 85%

Reply by **SiteAdmin** on **03/31/2025** at **5:04pm** [Comment ID: 1139] - [Link](#)

Answer

Agree: 0, Disagree: 0

Thanks. I will fix it.

#004

Posted by **Jennifer Friese** on **04/15/2025** at **8:57am** [Comment ID: 1190] - [Link](#)

Suggestion

Agree: 0, Disagree: 0

This is especially true for ALL embedded RG2 and RG3 lots.

Min. lot size 12 units (N5B)	25,862.07	12,931.03
Lots < min. lot size	62%	73%
Avg. 1,250 SF Unit		
Units per acre	12.13	24.25
Min. lot size 6 units (N5A)	21,551.72	10,775.86
Lots < min. lot size	62%	71%
Min. lot size 12 units (N5B)	43,103.45	21,551.72
Lots < min. lot size	65%	76%

It is of significance that the minimum lot sizes required to achieve the proposed N5A and N5B unit-per-lot limits almost perfectly align with the existing lot sizes in the smallest lot size class identified in Step 1—at roughly one-half acre.

Single-family Analysis

	RG-2/RG-3	N5A/N5B
Existing		
Single-family base FAR	Unlimited	1.0
Single-family lot size	1,000 SF min.	n/a (lot size and units per lot control; sublots allowed)
Single-family per acre	44 max.	39 max.


There is no significant difference in the number of single-family (i.e., single-unit) houses allowed under RG-2/RG-3 and N5A/N5B from a zoning perspective.

The key difference is that N5A/N5B require between 10% and 15% of the lot to be set aside as amenity space—whereas no such requirement exists under RG-2 and RG-3, which are exempt from open space requirements if developed as single-family dwellings.


RECOMMENDATION

Based on the analysis conducted above, the Consultant Team recommends the following conversion approach for RG-2 and RG-3 Districts.

- **RG-2 recommendation:**

- » If 50% or more of the cluster's area is made up of lots that are half an acre or smaller, convert it to N5A-R2.
- » If less than 50% of cluster's area is made up of lots that are half an acre or smaller but the cluster is in a historic district that requires "house scale," convert it to N5A-R2.
- » In all other cases, convert to UG3A-R2, as originally planned. 

- **RG-3 recommendation:**

- » If 50% or more of the cluster's area is made up of lots that are half an acre or smaller, convert it to N5B-R2. 
- » In all other cases, convert to UG3A-RX1, as originally proposed.

- In both RG-2 and RG-3, Chapter 9 allows nonconforming buildings to be rebuilt to their existing height and number of units if accidentally destroyed.

Please refer to the maps on the following pages for affected locations citywide and in northeast Atlanta.

#005

Posted by **Jennifer Frieese** on **04/15/2025** at **9:09am** [Comment ID: 1192] - [Link](#)

Suggestion

Agree: 0, Disagree: 0

Please consider converting the outlier Large Embedded RG3 to N6A-R2. This more closely fits the existing pattern within neighborhoods.

#006

Posted by **Jennifer Frieese** on **04/15/2025** at **9:02am** [Comment ID: 1191] - [Link](#)

Suggestion

Agree: 0, Disagree: 0

Please consider converting the outliers, Large Embedded RG2, to N6A-R2 to uphold neighborhood scale development.

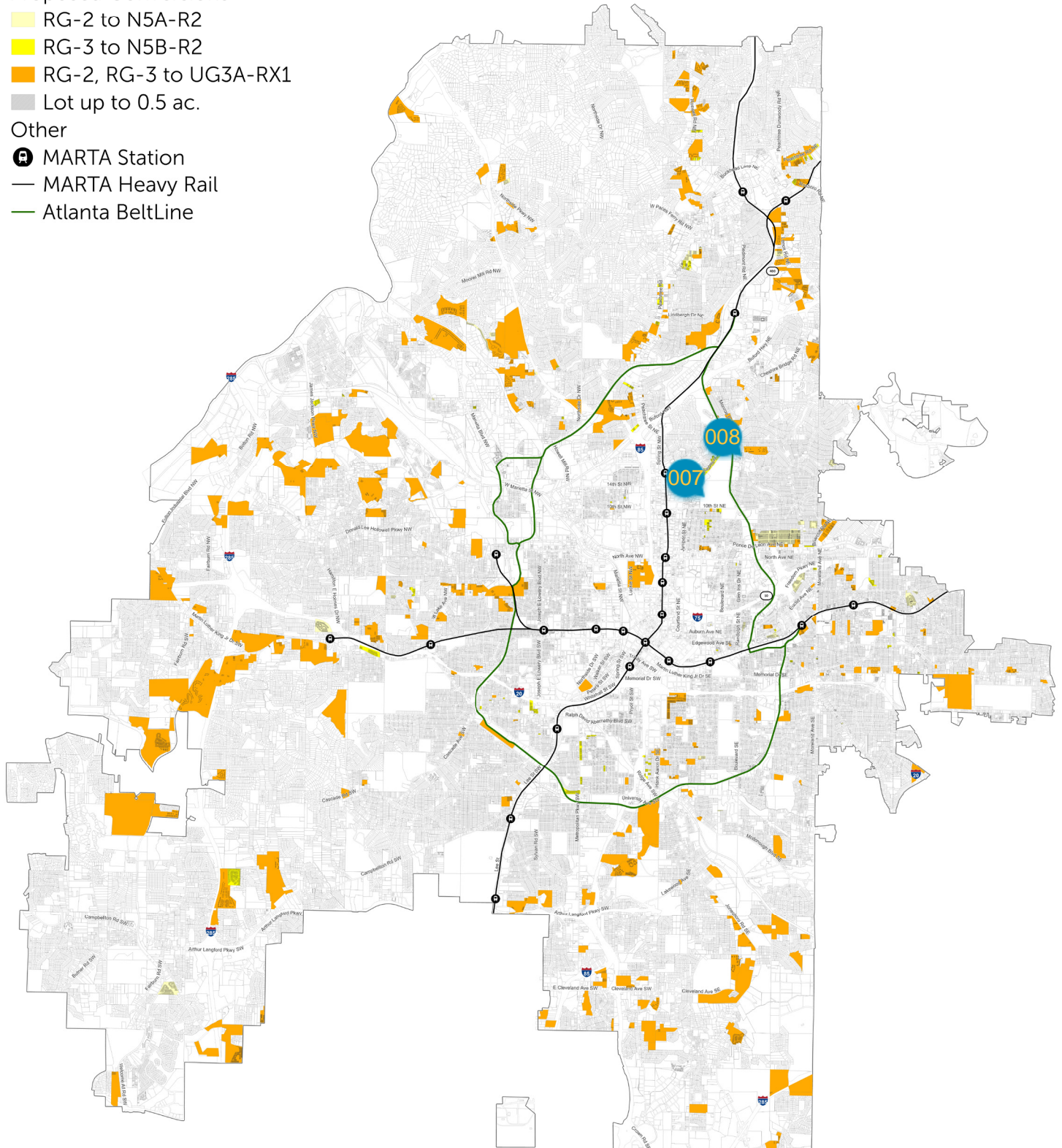
DRAFT - 2/13/25

Proposed Conversions

- RG-2 to N5A-R2
- RG-3 to N5B-R2
- RG-2, RG-3 to UG3A-RX1
- Lot up to 0.5 ac.

Other

- MARTA Station
- MARTA Heavy Rail
- Atlanta BeltLine



#007

Posted by **Jennifer Frieese** on **04/15/2025** at **9:44am** [Comment ID: 1194] - [Link](#)

Suggestion

Agree: 0, Disagree: 0

This is an RG3 lot that contains Hanover House/Colony House/ Ansley Terrace. These began their life in 1904 as three+ single family lots and were developed in 1975 as part of Colony Square, the original design was a step down from the high density on Peachtree to the neighborhood scale of Ansley Park. Again, what makes this so successful are the beautiful D=4+S+L/10 setbacks, these buildings do not impose on the surrounding R4 lots. This development was a product of robust community input. The only egress on these lots are from the residential 15th Street and a LIT lane will soon be implemented there. RG3 says that buildings over 50 units may have commercial uses that serve their residents and are designed and scaled for their residents, perhaps this original language can be added into R2? General commercial uses in embedded RG3 lots will bring a myriad of issues, traffic, parking, deliveries, garbage, noise etc. Embedded properties that wish to have general commercial uses should go through the public process so neighborhoods can weigh in. Please consider converting Embedded Large Lot Rg3 to N6A-R2

Reply by **SiteAdmin** on **04/15/2025** at **10:57am** [Comment ID: 1197] - [Link](#)

Agree: 0, Disagree: 0

Thank you for your suggestion.

#008

Posted by **Jennifer Frieese** on **04/15/2025** at **9:18am** [Comment ID: 1193] - [Link](#)

Suggestion

Agree: 0, Disagree: 0

This is Ansley Walk Terrace, a condo building with over 30 units on a RG2 lot. The lot is contiguous to 17 R-4 single family lots. The only form of egress is a small, dead-end street without sidewalks. Keeping embedded lots like this at a neighborhood scale is important within neighborhoods. Converting this to N6A will still allow people growth while ensuring setbacks that respect surrounding properties.

DRAFT - 2/13/25

