

DATE: May 19, 2020

ARC REVIEW CODE: R2005041

TO: Chairman Romona Jackson Jones, Douglas County
ATTN TO: Phil Shafer, Planning and Zoning Department
FROM: Douglas R. Hooker, Executive Director
RE: Development of Regional Impact (DRI) Review



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Original on file

The Atlanta Regional Commission (ARC) has completed regional review of the following Development of Regional Impact (DRI). ARC reviewed the DRI with regard to its relationship to regional plans, goals and policies – and impacts it may have on the activities, plans, goals and policies of other local jurisdictions as well as state, federal and other agencies. This final report does not address whether the DRI is or is not in the best interest of the host local government.

Name of Proposal: The Preserve (DRI #3090)

Submitting Local Government: Douglas County

Review Type: Development of Regional Impact **Date Opened:** May 4, 2020 **Date Closed:** May 19, 2020

Description: A Development of Regional Impact (DRI) review of a proposed health-oriented retreat center with mixed uses, including lodging, staff housing, agricultural production, offices, retail, golf and other uses. The 1,136-acre site is located in unincorporated Douglas County south of Duncan Memorial Highway (SR 166) with additional access points off 5 Notch Road and Cantrell Road. The site sits on the western shore of Dog River Reservoir and surrounds Basket Creek and Basket Creek Lake. The local trigger is a rezoning.

Comments: According to the ARC Unified Growth Policy Map (UGPM), part of The Atlanta Region's Plan, this DRI is in a Rural Area of the region. ARC's Regional Development Guide (RDG) details recommended policies for areas and places on the UGPM. General RDG information and recommendations for Rural Areas are listed at the bottom of these comments.

This DRI appears to manifest some aspects of regional policy. It proposes a master-planned health and wellness community designed for multi-day stays for guests to participate in a variety of therapies and activities in a natural setting. About 350 cottages and larger homes will be scattered around the site, surrounding Basket Creek and the western shore of Dog River Reservoir. Agricultural products grown and produced on site will be available for consuming. It proposes a reduced footprint for internal transportation by requiring the use of electric vehicles on the site, after guests arrive at the main entrance. It proposes seeking certification for sustainable construction and operations.

The project as proposed supports The Atlanta Region's Plans stated goals of protecting public water supplies and water quality; promoting health, arts and other aspects of a high-quality life (including bicycle and pedestrian options); and integrating sound environmental principles. For more details on the newly adopted portions of The Atlanta Region's Plan, visit <https://www.atlantaregionsplan.org>.

To capitalize on this potential, care should be taken to ensure that the development, as constructed, promotes an interconnected, functional, clearly marked and comfortable bike/pedestrian experience on all streets, paths, entrances, and parking areas. The project proposes reduced driving as a central concept and intends to use traffic calming, "shared space" street design, and a network of trails to promote walkability across the site. When considering external vehicular access for guests, staff, and deliveries, primary access is proposed with a driveway accessing Duncan Memorial Highway (SR 166). Surrounding residents have raised concerns about the impact of deliveries to and from the smaller local rural roads (Cantrell Road and Five Notch Road). While the expected volumes are low, the local governments and development team should take care to consider existing roadway conditions, sight distances, signage, and other improvements that may be necessary to accommodate new trips on these formerly dead-end rural roads.

Please see the attached comments from the Douglas County Department of Transportation, which notes a variety of requirements related to redevelopment of frontage on County roadways and gating requirements. The county will require the developer to upgrade the local roads leading to the project up to county standards and suggests building sidewalk along the south side of Cantrell Road to comply with requirements of the Americans with Disabilities Act. Note the attached comments regarding the height of construction equipment from Georgia Department of Transportation's aviation division. Additional comments from ARC's Transportation Access & Mobility Group are attached.

The project is located in an environmentally significant location, based on its bordering of the Dog Creek Reservoir, which is the primary water supply for Douglas County. The site plan depicts a 200-foot buffer from the elevation of 795 feet, which would allow for rise in the reservoir. An agreement has been reached with the Douglasville-Douglas County Water and Sewer Authority on mitigating potential impacts. The southeastern portion of the site falls within the 2,000-foot buffer for the Chattahoochee River Corridor, meaning any proposed land disturbances in this buffer will require a review under the Metropolitan River Protection Act (MRPA). Please see the attached comments from Georgia Department of Natural Resources detailing the state-protected species that are believed to be on and near the DRI site, as well as recommendations on construction practices to protect species and water quality.

The project can further support The Atlanta Region's Plan by incorporating other aspects of regional policy, including green infrastructure and/or low-impact design (e.g., rain gardens, vegetated swales, etc.) in park/green spaces, parking areas and along internal roadways, and as part of any improvements to site frontages. Additional comments from ARC's Natural Resources Group are attached.

This project as proposed appears to be compatible with the goals and standards defined in the 2018 update of the Douglas County Comprehensive Plan. This location falls within the "Rural Places" character area, which is described as "outlying rural areas with active farming and scattered single-family housing on large lots." It specifies that commercial development should only take place at locations designated on the

Future Land Use Map and within Master Planned Developments such as this one. The Comprehensive Plan allows these Master Planned Developments to integrate small commercial uses.

Further to the above, developing Rural and Rural Areas of the 20-county region are mostly undeveloped land within the region. Developing Rural areas are areas that are being planned for new development, and Rural Areas are areas that are planned to see limited or no growth. Both of these areas may have limited infrastructure and services. General policy recommendations for Developing Rural and Rural Areas include:

- Maintain rural road characteristics and protect scenic corridors
- Implement conservation design and development as appropriate in new residential neighborhoods
- Develop opportunities for heritage, recreation, and agriculturally-based tourism initiatives
- Identify areas to preserve as future large parks or conservation areas and create partnerships and dedicated funding sources for land conservation activities
- Identify opportunities for the development of rural broadband technology

THE FOLLOWING LOCAL GOVERNMENTS AND AGENCIES RECEIVED NOTICE OF THIS REVIEW:

ARC COMMUNITY DEVELOPMENT
ARC RESEARCH & ANALYTICS
GEORGIA DEPARTMENT OF NATURAL RESOURCES
CITY OF DOUGLASVILLE

ARC TRANSPORTATION ACCESS & MOBILITY
ARC AGING & HEALTH RESOURCES
GEORGIA DEPARTMENT OF TRANSPORTATION
FULTON COUNTY

ARC NATURAL RESOURCES
GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS
GRTA/SRTA
CITY OF CHATTAHOOCHEE HILLS

If you have any questions regarding this review, please contact Greg Giuffrida at (470) 378-1531 or ggiuffrida@atlantaregional.org. This finding will be published to the ARC review website located at <http://atlantaregional.org/plan-reviews>.



Developments of Regional Impact

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DRI #3090

DEVELOPMENT OF REGIONAL IMPACT Initial DRI Information

This form is to be completed by the city or county government to provide basic project information that will allow the RDC to determine if the project appears to meet or exceed applicable DRI thresholds. Refer to both the [Rules for the DRI Process](#) and the [DRI Tiers and Thresholds](#) for more information.

Local Government Information

Submitting Local
Government: Douglas

Individual completing form: Phil Shafer

Telephone: 770-920-7313

E-mail: pshafer@co.douglas.ga.us

*Note: The local government representative completing this form is responsible for the accuracy of the information contained herein. If a project is to be located in more than one jurisdiction and, in total, the project meets or exceeds a DRI threshold, the local government in which the largest portion of the project is to be located is responsible for initiating the DRI review process.

Proposed Project Information

Name of Proposed Project: The Preserve

Location (Street Address, Highway 166; Cantrell Rd; 6748, 6764, and 6834 Five Notch Rd, described as Parcel 3 in GPS Coordinates, or Legal Land Lots 15,
Land Lot Description):

Brief Description of Project: A mixed use project with residential, civic, recreational, hospitality, commercial, and agricultural components in a rural, low-density campus-like LEED Platinum built environment.

Development Type:

- | | | |
|--|---|---|
| <input type="radio"/> (not selected) | <input type="radio"/> Hotels | <input type="radio"/> Wastewater Treatment Facilities |
| <input type="radio"/> Office | <input checked="" type="radio"/> Mixed Use | <input type="radio"/> Petroleum Storage Facilities |
| <input type="radio"/> Commercial | <input type="radio"/> Airports | <input type="radio"/> Water Supply Intakes/Reservoirs |
| <input type="radio"/> Wholesale & Distribution | <input type="radio"/> Attractions & Recreational Facilities | <input type="radio"/> Intermodal Terminals |
| <input type="radio"/> Hospitals and Health Care Facilities | <input type="radio"/> Post-Secondary Schools | <input type="radio"/> Truck Stops |
| <input type="radio"/> Housing | <input type="radio"/> Waste Handling Facilities | <input type="radio"/> Any other development types |
| <input type="radio"/> Industrial | <input type="radio"/> Quarries, Asphalt & Cement Plants | |

If other development type, describe:

Project Size (# of units, floor
area, etc.): 1100 acres

Developer: Preserve Life Corp.

Mailing Address: 3751 Highway 166

Address 2:

City: Douglasville State: GA Zip: 30135

Telephone: 516-567-6699

Email: jfowler@hrflegal.com

Is property owner different
from developer/applicant? ☐ (not selected) ☒ Yes ☐ No

If yes, property owner: Mr. Lee W. Richards

Is the proposed project
entirely located within your
local government's
jurisdiction? ☐ (not selected) ☒ Yes ☐ No

If no, in what additional
jurisdictions is the project
located?

Is the current proposal a
continuation or expansion of
a previous DRI? ☐ (not selected) ☐ Yes ☐ No

If yes, provide the following Project Name:

Information: Project ID:

The initial action being
requested of the local
government for this project:

☒ Rezoning
☐ Variance
☐ Sewer
☐ Water
☐ Permit
☐ Other

Is this project a phase or
part of a larger overall
project? ☐ (not selected) ☒ Yes ☐ No

If yes, what percent of the
overall project does this
project/phase represent? 60%

Estimated Project Completion Dates: This project/phase: 1-3 years (2021-24)
Overall project: 4-7 years (2025-2028)

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DRI #3090

DEVELOPMENT OF REGIONAL IMPACT Additional DRI Information

This form is to be completed by the city or county government to provide information needed by the RDC for its review of the proposed DRI. Refer to both the [Rules for the DRI Process](#) and the [DRI Tiers and Thresholds](#) for more information.

Local Government Information

Submitting Local Government: Douglas
Individual completing form: Phil Shafer
Telephone: 770-920-7313
Email: pshafer@co.douglas.ga.us

Project Information

Name of Proposed Project: The Preserve
DRI ID Number: 3090
Developer/Applicant: Preserve Life Corp.
Telephone: 516-567-6699
Email(s): jfowler@hrflegal.com

Additional Information Requested

Has the RDC identified any additional information required in order to proceed with the official regional review process? (If no, proceed to Economic Impacts.)
☐ (not selected) ☒ Yes ☐ No

If yes, has that additional information been provided to your RDC and, if applicable, GRTA?
☒ (not selected) ☐ Yes ☐ No

If no, the official review process can not start until this additional information is provided.

Economic Development

Estimated Value at Build-Out: 200,000,000.00

Estimated annual local tax revenues (i.e., property tax, sales tax) likely to be generated by the proposed development: \$2.477M

Is the regional work force sufficient to fill the demand created by the proposed project?
☐ (not selected) ☒ Yes ☐ No

Will this development displace any existing uses?
☐ (not selected) ☐ Yes ☒ No

If yes, please describe (including number of units, square feet, etc):

Water Supply

Name of water supply provider for this site: Douglasville Douglas County Water and Sewer Authority (WSA)

What is the estimated water supply demand to be generated by the project, measured in Millions of Gallons Per Day (MGD)? .214 MGD

Is sufficient water supply capacity available to serve the proposed project?
☐ (not selected) ☒ Yes ☐ No

If no, describe any plans to expand the existing water supply capacity:

Is a water line extension required to serve this project? ☐ (not selected) ☒ Yes ☐ No

If yes, how much additional line (in miles) will be required?
Water mains within Cantrell Road and GA Hwy 166 fronting and adjoining the property will need to be expanded and extended into the project site to serve the development.

Wastewater Disposal

Name of wastewater treatment provider for this site: Douglasville Douglas County Water and Sewer Authority (WSA)

What is the estimated sewage flow to be generated by the project, measured in Millions of Gallons Per Day (MGD)? .209 MGD

Is sufficient wastewater treatment capacity available to serve this proposed project? ☐ (not selected) ☒ Yes ☐ No

If no, describe any plans to expand existing wastewater treatment capacity: The development will require construction of a new gravity fed lift station down-dip of the development for processing the full development flows. The project will rely upon onsite treatment (septic systems) until the anticipated lift station project is completed.

Is a sewer line extension required to serve this project? ☐ (not selected) ☒ Yes ☐ No

If yes, how much additional line (in miles) will be required? Approximately 1.75 miles to extend from project site to proposed lift station.

Land Transportation

How much traffic volume is expected to be generated by the proposed development, in peak hour vehicle trips per day? (If only an alternative measure of volume is available, please provide.) 850 daily trip ends

Has a traffic study been performed to determine whether or not transportation or access improvements will be needed to serve this project? ☐ (not selected) ☒ Yes ☐ No

Are transportation improvements needed to serve this project? ☐ (not selected) ☒ Yes ☐ No

If yes, please describe below: Access to GA Hwy 166 shall require GDOT review and authorization for design and installation of entry to the site including anticipated deceleration lane, turn lanes, striping, widening curbing, gutter, etc. Access to the development from Cantrell Road and Five Notch Road shall require coordination and review by Douglas County DOT to make access management modifications to the property frontages to include, but not limited to deceleration lanes, curb, gutter, associated drainage structures, queuing length for entries with gates and possible sidewalk extensions.

Solid Waste Disposal

How much solid waste is the project expected to generate annually (in tons)? 576 TPY

Is sufficient landfill capacity available to serve this proposed project? ☐ (not selected) ☒ Yes ☐ No

If no, describe any plans to expand existing landfill capacity:

Will any hazardous waste be generated by the development? ☐ (not selected) ☒ Yes ☐ No

If yes, please explain:

Stormwater Management

What percentage of the site is projected to be impervious surface once the proposed development has been constructed? 14.6% (165.4 acres out of the 1136.1 acre development site)

Describe any measures proposed (such as buffers, detention or retention ponds, pervious parking areas) to mitigate the project's impacts on stormwater management: The Dog River Basin portion of the development has a limitation of 40 acres total maximum impervious surface out of the 500+ acres within the basin. The non-Dog River Basin portion of the development is limited to 20% maximum impervious surface (125.4 acres out of the 600+ acres). The development will implement low-impact development strategies where/when applicable including pervious parking, trails, roads, bio-filtration, rain gardens, etc. Stormwater to be managed/retained via existing natural topography and on-site lakes.

Environmental Quality

Is the development located within, or likely to affect any of the following:

1. Water supply watersheds? ☐ (not selected) ☒ Yes ☐ No
2. Significant groundwater recharge areas? ☐ (not selected) ☐ Yes ☒ No
3. Wetlands? ☐ (not selected) ☐ Yes ☒ No
4. Protected mountains? ☐ (not selected) ☐ Yes ☒ No
5. Protected river corridors? ☐ (not selected) ☐ Yes ☒ No
6. Floodplains? ☐ (not selected) ☐ Yes ☒ No
7. Historic resources? ☐ (not selected) ☐ Yes ☒ No
8. Other environmentally sensitive resources? ☐ (not selected) ☐ Yes ☒ No

If you answered yes to any question above, describe how the identified resource(s) may be affected:
Project boundary is within the Dog River Basin Reservoir that supplies potable water to the County. Development within that basin is restricted in acreage to minimize impacts. Site is also within the boundary of the Chattahoochie River Metropolitan River Protection Act area and development within that zone will be subject to MRPA review and authorization prior to any development taking place.

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MARK WILLIAMS
COMMISSIONER

RUSTY GARRISON
DIRECTOR

May 07, 2020

Greg Giuffrida
Plan Review Technician
Atlanta Regional Commission
229 Peachtree Street NE
Suite 100
Atlanta, GA 30303

Subject: Known occurrences of natural communities, plants and animals of highest priority conservation status on or near DRI 3090 The Preserve, Douglas County, Georgia

Dear Mr. Giuffrida:

This is in response to your request of May 4, 2020. The following Georgia natural heritage database element occurrences (EOs) were selected for the current site using the local HUC10 watershed for elements whose range distribution is limited by aquatic systems (AQ) and within 3 miles for all other EOs (TR).

(-84.809831, 33.598330, WGS84)

GA *Cambarus howardi* (Chattahoochee Crayfish) in Dog River (AQ), approx. 2.4 mi N of site

GA *Cambarus howardi* (Chattahoochee Crayfish) in Dog River (AQ), approx. 1.4 mi NW of site

GA *Cyprinella callitaenia* (Bluestripe Shiner) in Snake River Huc 10 - 0313000204 (AQ), approx. 6.8 mi SW of site

GA *Cyprinella callitaenia* (Bluestripe Shiner) in Dog River Huc 10 - 0313000203 (AQ), approx. 5.5 mi NW of site

GA *Cyprinella callitaenia* (Bluestripe Shiner) [Historic] in Chattahoochee River Huc 10 - 0313000203 (AQ), approx. 10.5 mi NE of site

Micropterus cataractae (Shoal Bass) in Wolf Creek Huc 10 - 0313000203 (AQ), approx. 4.7 mi W of site

Micropterus cataractae (Shoal Bass) in Dog River Huc 10 - 0313000203 (AQ), approx. 5.5 mi NW of site

Micropterus cataractae (Shoal Bass) [Historic] in Anneewakee Creek (AQ), approx. 6.8 mi NE of site

Micropterus chattahoochae (Chattahoochee Bass) in Two Unnamed Crawfish Creek Tributaries Huc 10 - 0313000203 (AQ), approx. 4.5 mi NW of site

Micropterus chattahoochae (Chattahoochee Bass) [Historic] in Snake River Huc 10 - 0313000203 Chattahoochee Lower North 7 (AQ), approx. 7.5 mi W of site

Micropterus chattahoochae (Chattahoochee Bass) [Historic] in Snake Creek Huc 10 - 0313000203 Chattahoochee River Lower North 7 (AQ), approx. 6.7 mi SW of site

GA *Notropis hypsilepis* (Highscale Shiner) in Snake Creek (AQ), approx. 6.7 mi SW of site
GA *Notropis hypsilepis* (Highscale Shiner) in Snake Creek (AQ), approx. 8.4 mi W of site
GA *Notropis hypsilepis* (Highscale Shiner) in Dog River (AQ), approx. 2.4 mi N of site
GA *Notropis hypsilepis* (Highscale Shiner) in Keaton Creek, Huc 10 - 0313000203
(Chattahoochee River Lower North 7) (AQ), approx. 6.2 mi NW of site
GA *Schisandra glabra* (Bay Star-vine) (TR), approx. 1.5 mi N of site
GA *Schisandra glabra* (Bay Star-vine) (TR), approx. 1.3 mi NW of site
GA *Schisandra glabra* (Bay Star-vine) (TR), approx. 1.6 mi NE of site
GA *Waldsteinia lobata* (Piedmont Barren Strawberry) [Historic] (TR), in an uncertain location
near the project site
GA *Waldsteinia lobata* (Piedmont Barren Strawberry) [Historic] (TR), approx. 1.3 mi NW of
site
GALT easement [Georgia-Alabama Land Trust] (TR), immediate vicinity of site
Greenspace program acquisition [county] (TR), approx. 1.9 mi NE of site
Restrictive covenant [U.S. Army Corps of Engineers] (TR), approx. 2.8 mi NE of site
Chattahoochee River Lower North 7 (0313000203) [SWAP High Priority Watershed]
(TR), on site

Recommendations:

Please be aware that state protected species have been documented near the proposed project. For information about these species, including survey recommendations, please visit our webpage at <http://georgiawildlife.com/conservation/species-of-concern#rare-locations>.

This project occurs within a high priority watershed. As part of Georgia's State Wildlife Action Plan, high priority watersheds were identified to protect the best-known populations of high priority aquatic species, important coastal habitats, and migratory corridors for anadromous species. Please refer to Appendix F of Georgia's State Wildlife Action Plan to find out more specific information about this high priority watershed:
<https://georgiawildlife.com/wildlifeactionplan>.

We are concerned about streams and other habitats that could be impacted by the proposed project. We recommend that stringent erosion control practices be used during construction activities and that vegetation is re-established on disturbed areas as quickly as possible. Silt fences and other erosion control devices should be inspected and maintained until soil is stabilized by vegetation. Please use natural vegetation and grading techniques (e.g. vegetated swales, turn-offs, vegetated buffer strips) that will ensure that the project site does not serve as a conduit for storm water or pollutants into the watershed during or after construction. These measures will help protect water quality near the project as well as in downstream areas.

Please be aware that the type of erosion control material used during construction can impact wildlife. We strongly recommend using natural, biodegradable materials such as 'jute' or 'coir'. Mesh strands should be movable, as opposed to fixed. Use of plastic fencing frequently leads to wildlife entrapment and death.

Disclaimer:

Please keep in mind the limitations of our database. The data collected by the Wildlife Conservation Section comes from a variety of sources, including museum and herbarium records, literature, and reports from individuals and organizations, as well as field surveys by our staff biologists. In most cases the information is not the result of a recent on-site survey by our staff. Many areas of Georgia have never been surveyed thoroughly. Therefore, the Wildlife Conservation Section can only occasionally provide definitive information on the presence or absence of rare species on a given site. Our files are updated constantly as new information is received. **Thus, information provided by our program represents the existing data in our files at the time of the request and should not be considered a final statement on the species or area under consideration.**

If you know of populations of highest priority species that are not in our database, please fill out the appropriate data collection form and send it to our office. Forms can be obtained through our web site (<http://georgiawildlife.com/conservation/species-of-concern#rare-locations>) or by contacting our office. If we can be of further assistance, please let us know.



Laci Pattavina, Wildlife Biologist, Environmental Reviews
laci.pattavina@dnr.ga.gov, (706) 557-3228

Data Available on the Wildlife Conservation Section Website

- Georgia protected plant and animal profiles are available on our website. These accounts cover basics like descriptions and life history, as well as threats, management recommendations and conservation status. Visit <http://georgiawildlife.com/conservation/species-of-concern#rare-locations>.
- Rare species and natural community information can be viewed by Quarter Quad, County and HUC8 Watershed. To access this information, please visit our GA Rare Species and Natural Community Information page at: <http://georgiabiodiversity.org/>
- Downloadable files of rare species and natural community data by quarter quad and county are also available. They can be downloaded from: <http://georgiabiodiversity.org/natels/natural-element-locations.html>

PRESERVE LIFE DRI
Douglas County
Natural Resources Group Review Comments
April 28, 2020

Chattahoochee River Corridor

The project property is located in the Chattahoochee River watershed and is downstream of the portion of the Chattahoochee that serves as a water supply source in the Atlanta Region. A portion of the project property is also within the 2000-foot Chattahoochee River Corridor. While the 2000-foot Corridor is not shown on the overall site plan, it is shown on several maps in the Map Index of the Methodology for Expedited Review and Preserve life Report. Figure 2.3.1 on Page 20 of the Preserve Life Report shows the Corridor and shadings reflect the mapped categories on the property. The accompanying caption references the Corridor and its enabling legislation, the Metropolitan River Protection Act (MRPA). Two corrections need to be made to that caption. First, the River Corridor does not end at Peachtree Creek. Since the Act was amended in 1998, the Corridor extends from Buford Dam to the downstream limits of Douglas and Fulton Counties. Also, development is not prohibited in the Corridor, but it is subject to review for consistency with the standards of the Chattahoochee Corridor Plan.

The proposed project site plan shows a small amphitheater and an access road in the Corridor, which will require a review for consistency with applicable Corridor Plan standards. The design of the Corridor portion of the project should provide for the consistent development of the future Foxhall Lift station and sewer line referenced on Page 38 of the Preserve Life Report, though the plant does not need to be included in the review for this project.

The Natural Resources Group has identified County and State regulations that could apply to this property. ARC and the Metropolitan North Georgia Water Planning District do not have regulatory or review authority under these regulations. Other regulations may also apply that we have not identified.

Dog River Watershed

A portion of the project property is within the Dog River Reservoir Watershed and abuts a portion of the reservoir. While the Dog River Reservoir is a public water supply source and is therefore covered by the State Part 5 Environmental Planning Criteria, Douglas County has requirements in this watershed that exceed the Part 5 Criteria minimums, including 200-foot buffers along the reservoir and on regulated streams, as defined by Douglas County. The Preserve Life Report addresses these requirements for the Dog River Watershed portion of the project. The required buffers and other requirements will need to be shown in detail on project site plans as the project is developed. Intrusions into these buffers may require variances from Douglas County.

Stream Buffers

The USGS coverage for the project area shows one unnamed blue-line stream running into the Dog River Reservoir as well as Basket Creek and one unnamed tributary outside the Dog River watershed. All of these streams are subject to the 50-foot stream buffer and additional 25-foot impervious setback required under Douglas County's stream buffer ordinance as well as the State 25-foot State Erosion and Sedimentation Act buffer. Again, these buffers will need to be shown on the project site plans as the project is developed. Any intrusions into these buffers or setbacks may require variances. Any other streams identified on the property may be subject to the City buffer ordinance and any waters of the state may be subject to the State erosion and sedimentation buffer.

Stormwater/Water Quality

The project should adequately address the impacts of the proposed development on stormwater runoff and downstream water quality.

Preserve Life DRI Natural Resources Group Comments

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April 28, 2020.

During the planning phase, the stormwater management system (system) should meet the requirements of the local jurisdiction's post-construction (or post-development) stormwater management ordinance. The system should be designed to prevent increased flood damage, streambank channel erosion, habitat degradation and water quality degradation, and enhance and promote the public health, safety and general welfare. The system design should also be in accordance with the applicable sections of the Georgia Stormwater Management Manual (www.georgiastormwater.com) such as design standards, calculations, formulas, and methods. Where possible, the project should use stormwater better site design practices included in the Georgia Stormwater Management Manual, Volume 2, Section 2.3.

During construction, the project should conform to the relevant state and federal erosion and sedimentation control requirements.

Greg Giuffrida

From: Hood, Alan C. <achood@dot.ga.gov>
Sent: Wednesday, May 13, 2020 11:13 AM
To: Greg Giuffrida
Cc: Brian, Steve; Comer, Carol; Edmisten, Colette; Robinson, Joseph
Subject: RE: ARC DRI Review Notification - The Preserve (DRI #3090) (aka Preserve Life)

Greg,

The proposed health-oriented retreat center with mixed uses, including lodging, staff housing, agricultural production, offices, retail, golf and other uses is on a 1,136-acre site is located in unincorporated Douglas County. It is located more than 10 miles from any civil airport, and is located outside any FAA approach or departure surfaces, and airport compatible land use areas, and does not appear to impact any airport.

However, if any construction equipment reaches 200' above ground or higher, 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.

Alan Hood

Airport Safety Data Program Manager



Aviation Programs

600 West Peachtree Street NW
6th Floor
Atlanta, GA, 30308
404.660.3394 cell
404.532.0082 office

From: Greg Giuffrida <GGiuffrida@atlantaregional.org>
Sent: Monday, May 4, 2020 6:30 PM
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Preserve Life Wellness Resort
Cantrell Rd & Five Notch Rd off Capps Ferry Rd

Posted Speed Limit along Cantrell Rd is: 35 mph
Road Classification of Cantrell Rd is: Collector
Existing ROW along Cantrell Rd per GIS map is: ROW Varies
Posted Speed Limit along Five Notch Rd is: 35 mph
Road classification of Five Notch Rd is: Collector
Existing ROW along Five Notch Rd per GIS map is: 50 ft.

Concept Review of March 10, 2020
DRC Meeting: March 11, 2020

The Development Plan should address the following comments:

<u>Item #</u>	<u>Comments</u>
1	Property frontage along existing County roadways will require improvements to comply with Douglas County Department of Transportation Standard Details; conforming to roadway typical sections, Right-Of-Way width, sidewalk and ADA requirements, and other roadway components as defined in the UDC Code.
2	Internal private roadways accommodating automobile traffic must conform to Douglas County Department of Transportation Standard Details; for roadway typical sections, corridor width, sidewalk / pathway requirements, and other roadway components as defined in the UDC Code.
3	Gates are prohibited along existing County roadways.
4	Gates to side street access must be a minimum of 50 feet from the main street travel lane, allowing two vehicles to align without extending into the roadway.
5	Due to increased traffic volume, improvements to Cantrell Rd shall consist of 1.1/2" of asphalt overlay and any improvements to shoulders or existing roadway as needed. Limits of overlay shall be from Capps Ferry Rd to Five Notch Rd.
6	Due to increased traffic volume, improvements to Five Notch Rd shall consist of total depth construction to comply with current County Standard Details.
7	Suggest providing sidewalk along the south side of Cantrell Rd from Capps Ferry Rd to Five Notch Rd with proper ADA ramps to comply with ADA requirements.
8	Left turn and Right turn deceleration lanes may be required along SR 166 subject to GDOT approval
9	Travel way for Private Local Roads appear to be narrow for standard vehicular traffic, additional width is recommended for safe passage.

Development of Regional Impact Assessment of Consistency with the Regional Transportation Plan

DRI INFORMATION

DRI Number #3090
DRI Title Preserve World Center for Holistic Wellness
County Douglas County
City (if applicable)
Address / Location Off Highway 166 East of Capps Ferry Road
Proposed Development Type: Approximately 1,136-acre site with residences, treatment facilities, recreation on other uses for a Therapeutic living facility

Review Process ☒ EXPEDITED
☐ NON-EXPEDITED

REVIEW INFORMATION

Prepared by ARC Transportation Access and Mobility Division
Staff Lead Marquitrice Mangham
Copied Greg Giuffrida, ARC Community Development
Date April 27, 2020

TRAFFIC STUDY

Prepared By: AECOM
Date April 1, 2020

REGIONAL TRANSPORTATION PLAN PROJECTS

01. Did the traffic analysis incorporate all projects contained in the current version of the fiscally constrained RTP which are within the study area or along major transportation corridors connecting the study area with adjacent jurisdictions?

☐ YES (*provide the regional plan referenced and the page number of the traffic study where relevant projects are identified*)

☒ NO (*provide comments below*)

The proposed development estimates 900 vehicle trips per day, prompting expedited review and a traffic memo. No projects are proposed adjacent to the project.

REGIONAL NETWORKS

02. Will the development site be directly served by any roadways identified as Regional Thoroughfares?

A Regional Thoroughfare is a major transportation corridor that serves multiple ways of traveling, including walking, bicycling, driving, and riding transit. It connects people and goods to important places in metropolitan Atlanta. A Regional Thoroughfare's operations should be managed through application of special traffic control strategies and suitable land development guidelines in order to maintain travel efficiency, reliability, and safety for all users. In light of the special function that Regional Thoroughfares serve in supporting cross-regional and interjurisdictional mobility and access, the network receives priority consideration for infrastructure investment in the Metro Atlanta region. Any access points between the development and a Regional Thoroughfare, combined with the development's on-site circulation patterns, must be designed with the goal of preserving the highest possible level of capacity and safety for all users of the roadway.

☐ NO

☒ YES (*identify the roadways and existing/proposed access points*)

Access to the site is proposed from Highway 166, a State Route.

03. Will the development site be directly served by any roadways identified as Regional Truck Routes?

A Regional Truck Route is a freeway, state route or other roadway which serves as a critical link for the movement of goods to, from and within the Region by connecting airports, intermodal/multimodal facilities, distribution and warehousing centers and manufacturing clusters with the rest of the state and nation. These facilities often serve a key mobility and access function for other users as well, including drivers, bicyclists, pedestrians and transit users. A Regional Truck Route's operations should be managed through application of special traffic control strategies and suitable land development guidelines in order to maintain travel efficiency, reliability, and safety for all users. In light of the special function that Regional Truck Routes serve in supporting cross-regional and interjurisdictional mobility and access, the network receives priority consideration for infrastructure investment in the Metro Atlanta region. Any access points between the development and a Regional Truck Route, combined with the development's on-site circulation patterns, must be designed with the goal of preserving the highest possible level of capacity and safety for all users of the roadway.

☐ NO

☒ YES (*identify the roadways and existing/proposed access points*)

Highway 166 will provide access to the proposed site.

04. If the development site is within one mile of an existing rail service, provide information on accessibility conditions.

Access between major developments and transit services provide options for people who cannot or prefer not to drive, expand economic opportunities by better connecting people and jobs, and can help reduce congestion. If a transit service is available nearby, but walking or bicycling between the development site and the nearest station is a challenge, the applicable local government(s) is encouraged to make the route a funding priority for future walking and bicycling infrastructure improvements.

☒ NOT APPLICABLE (*nearest station more than one mile away*)

☐ RAIL SERVICE WITHIN ONE MILE (*provide additional information below*)

Operator / Rail Line

Nearest Station

[Click here to enter name of operator and rail line](#)

Distance*

☐ Within or adjacent to the development site (0.10 mile or less)

☐ 0.10 to 0.50 mile

☐ 0.50 to 1.00 mile

Walking Access*

☐ Sidewalks and crosswalks provide sufficient connectivity

☐ Sidewalk and crosswalk network is incomplete

☐ Not applicable (*accessing the site by walking is not consistent with the type of development proposed*)

[Click here to provide comments.](#)

Bicycling Access*

- ☐ Dedicated paths, lanes or cycle tracks provide sufficient connectivity
- ☐ Low volume and/or low speed streets provide connectivity
- ☐ Route follows high volume and/or high speed streets
- ☐ Not applicable (*accessing the site by bicycling is not consistent with the type of development proposed*)

Transit Connectivity

- ☐ Fixed route transit agency bus service available to rail station
- ☐ Private shuttle or circulator available to rail station
- ☐ No services available to rail station
- ☐ Not applicable (*accessing the site by transit is not consistent with the type of development proposed*)

[Click here to provide comments.](#)

** Following the most direct feasible walking or bicycling route to the nearest point on the development site*

05. If there is currently no rail transit service within one mile of the development site, is nearby rail service planned in the fiscally constrained RTP?

Access between major developments and transit services provide options for people who cannot or prefer not to drive, expand economic opportunities by better connecting people and jobs, and can help reduce traffic congestion. If a transit agency operates within the jurisdiction and expansion plans are being considered in the general vicinity of the development site, the agency should give consideration to how the site can be best served during the evaluation of alignments and station locations. Proactive negotiations with the development team and local government(s) are encouraged to determine whether right-of-way within the site should be identified and protected for potential future service. If direct service to the site is not feasible or cost effective, the transit agency and local government(s) are encouraged to ensure good walking and bicycling access accessibility is provided between the development and the future rail line. These improvements should be considered fundamental components of the overall transit expansion project, with improvements completed concurrent with or prior to the transit service being brought online.

- ☐ NOT APPLICABLE (*rail service already exists*)
- ☐ NOT APPLICABLE (*accessing the site by transit is not consistent with the type of development proposed*)
- ☒ NO (*no plans exist to provide rail service in the general vicinity*)
- ☐ YES (*provide additional information on the timeframe of the expansion project below*)
 - ☐ CST planned within TIP period
 - ☐ CST planned within first portion of long range period
 - ☐ CST planned near end of plan horizon

Click here to provide comments.

06. If the development site is within one mile of fixed route bus services (including any privately operated shuttles or circulators open to the general public), provide information on walking and bicycling accessibility conditions.

Access between major developments and transit services provide options for people who cannot or prefer not to drive, expand economic opportunities by better connecting people and jobs, and can help reduce congestion. If a transit service is available nearby, but walking or bicycling between the development site and the nearest station is a challenge, the applicable local government(s) is encouraged to make the connection a funding priority for future walking and bicycling infrastructure improvements.

☒ NOT APPLICABLE (nearest bus, shuttle or circulator stop more than one mile away)

☐ SERVICE WITHIN ONE MILE (provide additional information below)

Operator(s) Douglas Connect

Bus Route(s) [Click here to enter bus route number\(s\).](#)

Distance* ☐ Within or adjacent to the development site (0.10 mile or less)

☐ 0.10 to 0.50 mile

☐ 0.50 to 1.00 mile

Walking Access* ☐ Sidewalks and crosswalks provide sufficient connectivity

☐ Sidewalk and crosswalk network is incomplete

☐ Not applicable (No Sidewalks or accessing the site by walking is not consistent with the type of development proposed)

[Click here to provide comments.](#)

Bicycling Access* ☐ Dedicated paths, lanes or cycle tracks provide sufficient connectivity

☐ Low volume and/or low speed streets provide sufficient connectivity

☐ Route uses high volume and/or high speed streets

☐ Not applicable (accessing the site by bicycling is not consistent with the type of development proposed)

* Following the most direct feasible walking or bicycling route to the nearest point on the development site

07. Does a transit agency which provides rail and/or fixed route bus service operate anywhere within the jurisdiction in which the development site is located?

Access between major developments and transit services provide options for people who cannot or prefer not to drive, expand economic opportunities by better connecting people and jobs, and can help reduce traffic congestion. If a transit agency operates within the jurisdiction and a comprehensive operations plan update is undertaken, the agency should give consideration to serving the site during the evaluation of future routes, bus stops and transfer facilities. If the nature of the development is amenable to access by transit, walking or bicycling, but direct service to the site is not feasible or cost effective, the transit agency and local government(s) should ensure good walking and bicycling access accessibility is provided between the development and any routes within a one mile radius. The applicable local government(s) is encouraged to make these connections a funding priority for future walking and bicycling infrastructure improvements.

☐ NO

☒ YES

Douglas Connect, GRTA Express

08. If the development site is within one mile of an existing multi-use path or trail, provide information on accessibility conditions.

Access between major developments and walking/bicycling facilities provide options for people who cannot or prefer not to drive, expand economic opportunities by better connecting people and jobs, and can help reduce traffic congestion. If connectivity with a regionally significant path or trail is available nearby, but walking or bicycling between the development site and those facilities is a challenge, the applicable local government(s) is encouraged to make the route a funding priority for future walking and bicycling infrastructure improvements.

☐ NOT APPLICABLE (nearest path or trail more than one mile away)

☒ YES (provide additional information below)

Name of facility Chattahoochee Greenway Trail is proposed in the area

Distance ☐ Within or adjacent to development site (0.10 mile or less)

☐ 0.15 to 0.50 mile

☐ 0.50 to 1.00 mile

Walking Access* ☐ Sidewalks and crosswalks provide connectivity

☒ Sidewalk and crosswalk network is incomplete

☐ Not applicable (accessing the site by walking is not consistent with the type of development proposed)

Bicycling Access* ☐ Dedicated lanes or cycle tracks provide connectivity

☐ Low volume and/or low speed streets provide connectivity

☐ Route uses high volume and/or high speed streets

☐ Not applicable (accessing the site by bicycling is not consistent with the type of development proposed)

* Following the most direct feasible walking or bicycling route to the nearest point on the development site

OTHER TRANSPORTATION DESIGN CONSIDERATIONS

09. Does the site plan provide for the construction of publicly accessible local road or drive aisle connections with adjacent parcels?

The ability for drivers and bus routes to move between developments without using the adjacent arterial or collector roadway networks can save time and reduce congestion. Such opportunities should be considered and proactively incorporated into development site plans whenever possible.

- ☐ YES (connections to adjacent parcels are planned as part of the development)
- ☐ YES (stub outs will make future connections possible when adjacent parcels redevelop)
- ☒ NO (the site plan precludes future connections with adjacent parcels when they redevelop)
- ☐ OTHER (Please explain)

The develop proposes limited vehicular use onsite. Access to future development would occur by Hwy 166.

10. Does the site plan enable pedestrians and bicyclists to move between destinations within the development site safely and conveniently?

The ability for walkers and bicyclists to move within the site safely and conveniently reduces reliance on vehicular trips, which has congestion reduction and health benefits. Development site plans should incorporate well designed and direct sidewalk connections between all key destinations. To the extent practical, bicycle lanes or multiuse paths are encouraged for large acreage sites and where high volumes of bicyclists and pedestrians are possible.

- ☒ YES (sidewalks provided on all key walking routes and both sides of roads whenever practical and bicyclists should have no major issues navigating the street network)
- ☐ PARTIAL (some walking and bicycling facilities are provided, but connections are not comprehensive and/or direct)
- ☐ NO (walking and bicycling facilities within the site are limited or nonexistent)
- ☐ NOT APPLICABLE (the nature of the development does not lend itself to internal walking and bicycling trips)
- ☐ OTHER (Please explain)

Pedestrian and bicycle facilities are proposed throughout the development and may allow for future connections to adjacent development in the future.

11. Does the site plan provide the ability to construct publicly accessible bicycling and walking connections with adjacent parcels which may be redeveloped in the future?

The ability for walkers and bicyclists to move between developments safely and conveniently reduces reliance on vehicular trips, which has congestion reduction and health benefits. Such opportunities should be considered and proactively incorporated into development site plans whenever possible.

- ☐ YES (connections to adjacent parcels are planned as part of the development)
- ☐ YES (stub outs will make future connections possible when adjacent parcels redevelop)
- ☐ NO (the development site plan does not enable walking or bicycling to/from adjacent parcels)
- ☐ NO (the site plan precludes future connections with adjacent parcels when they redevelop)
- ☒ NOT APPLICABLE (adjacent parcels are not likely to develop or redevelop in the near future)
- ☐ NOT APPLICABLE (the nature of the development or adjacent parcels does not lend itself to interparcel walking and bicycling trips)

Bicycle and pedestrian facilities do not exist along SR 166. Internal connections to adjacent parcels may be developed once improved.

12. Does the site plan effectively manage truck movements and separate them, to the extent possible, from the flow of pedestrians, bicyclists and motorists both within the site and on the surrounding road network?

The ability for delivery and service vehicles to efficiently enter and exit major developments is often key to their economic success. So is the ability of visitors and customers being able to move around safely and pleasantly within the site. To the extent practical, truck movements should be segregated by minimizing the number of conflict points with publicly accessible internal roadways, sidewalks, paths and other facilities.

- ☐ YES (truck routes to serve destinations within the site are clearly delineated, provide ample space for queuing and turning around, and are separated from other users to the extent practical)
- ☐ PARTIAL (while one or more truck routes are also used by motorists and/or interface with primary walking and bicycling routes, the site plan mitigates the potential for conflict adequately)
- ☐ NO (one or more truck routes serving the site conflict directly with routes likely to be used heavily by pedestrians, bicyclists and/or motorists)
- ☒ NOT APPLICABLE (the nature of the development will not generate a wide variety of users and/or very low truck volumes, so the potential for conflict is negligible)

RECOMMENDATIONS

13. Do the transportation network recommendations outlined in the traffic study appear to be feasible from a constructability standpoint?

- ☐ UNKNOWN *(additional study is necessary)*
- ☒ YES *(based on information made available through the review process; does not represent a thorough engineering / financial analysis)*
- ☐ NO *(see comments below)*

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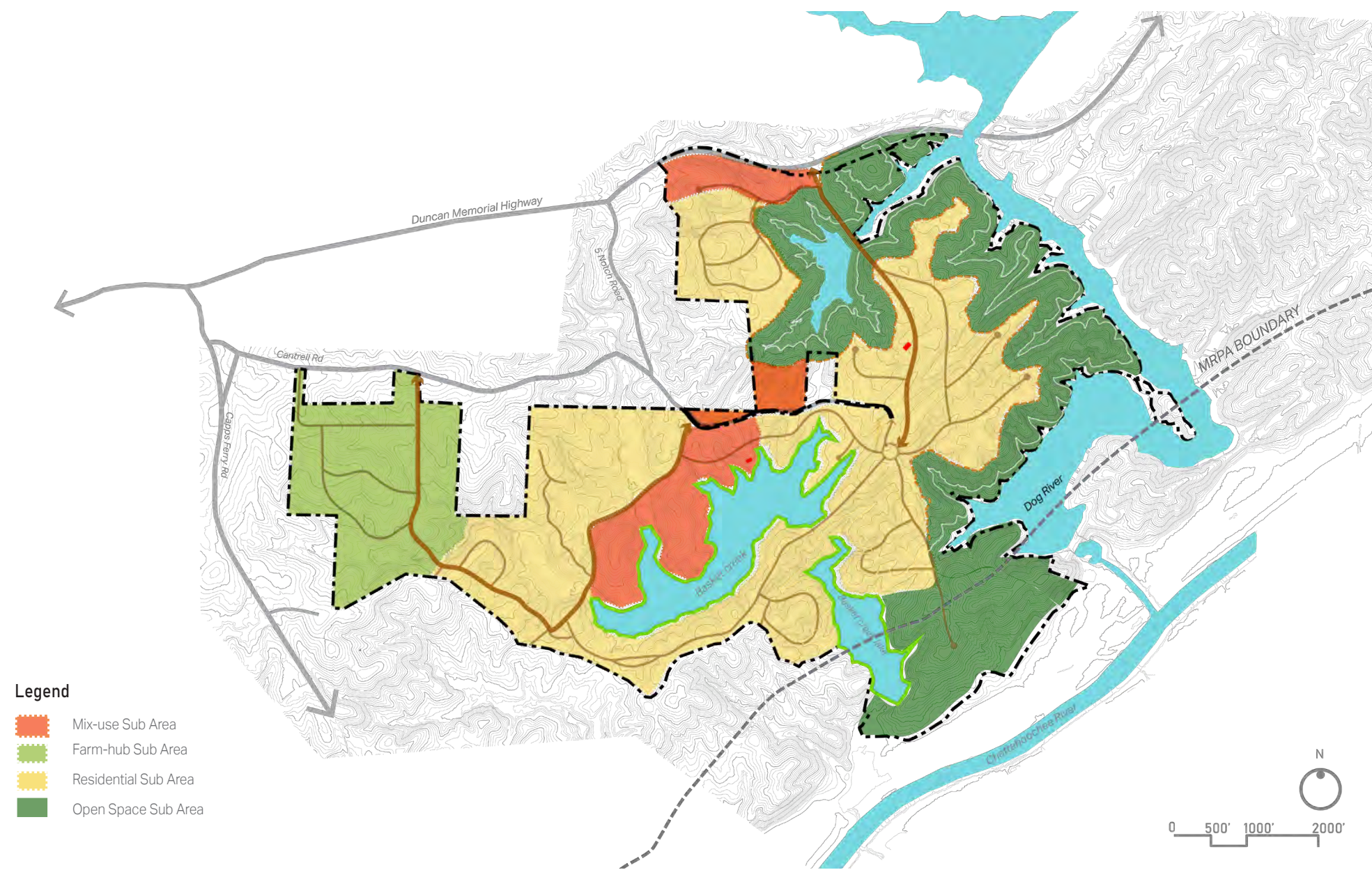
14. Is ARC aware of any issues with the development proposal which may result in it being opposed by one or more local governments, agencies or stakeholder groups?

- ☒ NO *(based on information shared with ARC staff prior to or during the review process; does not reflect the outcome of an extensive stakeholder engagement process)*
- ☐ YES *(see comments below)*

15. ARC offers the following additional comments for consideration by the development team and/or the applicable local government(s):

None.

Proposed Sub-Area Plan and Maximum Development Limits



#	Sub-Area	Area of Sub-Areas (acres)	Percentage of Sub-Areas to total land area (%)	Broad Land use	Use/ Building Type	Maximum Units Permitted	Maximum Unit area (sq.ft)	Maximum Built-up (sq.ft)
1	Mixed-use Sub Area	104.00	9.15%	Commercial	Wellness Core			700,000
				Commercial near highway 166	Offices + Retail + Check-in area			175,000
				Commercial	Town Center			125,000
				Short-term Residential	Transient Professional Staff Accommodation	120	1250	150,000
				Short-term Residential	Wellness Cottages	50	2000	100,000
				Short-term Residential	Wellness Suites	200	500	100,000
2	Farm-Hub Sub Area	125.00	11.00%	Agriculture	Agricultural Structure			500,000
				Residential	Farm Residences	50	3500	175,000
3	Residential Sub Area	452.00	39.79%	Residential	Wellness Homes	250	16,000	4,000,000
4	Water Sub Area	128.71	11.33%	Water				
5	Open Space Sub Area	326.40	28.73%	Open space				
TOTAL LAND AREA		1136.11	100.00%					6,025,000



Development Standards by building use/ type

#	Parameter	Wellness Core	Office & Retail	Standard Town Center
1	Building use			
2	Maximum building coverage under roof (sq.ft.)	350,000	100,000	80,000
3	Maximum building coverage under roof (sq.ft.)			1200
3	Maximum Built-up Area (sq.ft.)	700,000	175,000	125,000
4	Maximum Heights from average finished grade across building sides facing streets (in feet)			2
5	Maximum Built-up Area (sq.ft.)			2000
6	Maximum Heights from average finished grade across building sides facing streets (in feet)			2
6	Maximum Built-up Area (sq.ft.)			100,000
6	Maximum Heights from average finished grade across building sides facing streets (in feet)			150,000
7	Principal building*			50
7	Minimum Setbacks from Roadways			50
7	50 feet Private Collector Road			30
7	Principal building*			30
7	Front			20
7	24 feet Private Local Road			20
7	Principal building*			20
7	Front			20
7	Minimum Building Separation (in feet)			50
6	Between two principal buildings			30
6	Between principal building and adjacent accessory building			20

#	Parameter	Wellness Suites	Standard Transient Professional Staff Accommodation
1	Building use		
2	Total Number of Units	200	120
3	Maximum building coverage under roof (sq.ft.)	50,000	75,000
4	Maximum unit area (sq.ft.)	500	1,250
5	Maximum number of bedrooms per unit	1	2
6	Maximum Built-up Area (sq.ft.)		100,000
6	Maximum Heights from average finished grade across building sides facing streets (in feet)		150,000
7	Principal building*		50
7	Minimum Setbacks from Roadways		50
7	50 feet Private Collector Road		30
7	Principal building*		30
7	Front		20
7	24 feet Private Local Road		20
7	Principal building*		20
7	Front		20
7	Minimum Building Separation		20
9	Between two principal buildings	50	40
9	Between principal building and adjacent accessory building		20

#	Parameter	Farm Residences	Standard Wellness Homes
1	Building use		
2	Total Number of Units	50	250
3	Maximum building coverage under roof (sq.ft.)	2500	10,000
4	Maximum number of bedrooms per unit	4	8
5	Maximum Built-up Area (sq.ft.)		3500
5	Maximum Heights from average finished grade across building sides facing streets (in feet)		16,000
6	Principal building*		30
6	Minimum Setbacks from Roadways (in feet)		40
6	50 feet Private Collector Road		30
6	Principal building*		30
6	Front		30
6	24 feet Private Local Road		30
6	Principal building*		30
6	Front		30
6	Minimum Building Separation (in feet)		30
8	Between two principal buildings		30
8	Between principal building and adjacent accessory building		20

Legend

- 01 Entrance + Parking + Retail
- 02 Commercial Office Space
- 03 Wellness Core
- 04 Wellness Homes
- 05 Green House+ Koi farm + Dairy +Poultry
- 06 Farming + Wellness Homes
- 07 Golf Course Wellness Homes
- 08 Town Centre
- 09 Transient Staff Residences
- 10 Amphitheatre + Natural Trails

PREPARED BY

AECOM
1360 Peachtree Street,
Suite 500, Atlanta,
Georgia 30309

SUBMITTED BY

PRESERVE LIFE
CORPORATION

LEGEND

- 795 CONTOUR LINE
- COUNTY BOUNDARY

- NOTE
- CONTOURS AND PARCEL LINES ARE APPROXIMATE.
 - ALL AREAS SHOWN TAKEN FROM DOUGLAS COUNTY TAX PARCEL MAP AND ARE APPROXIMATE.
 - NO FIELD WORK PERFORMED BY GEORGIA AND WEST AT THIS TIME.
 - CONTOURS ARE AT 5' INTERVALS
 - 100 YEAR FLOODPLAIN LINES ARE APPROXIMATE.

SITE AREA: 1136.11 ACRES

DRI APPLICATION NO : 3090

OVERALL DEVELOPMENT PLAN,
PRESERVE WORLD CENTER FOR
HOLISTIC WELLNESS AND
APPLIED HEALTH
DOUGLAS COUNTY, GA, USA

SHEET NUMBER
01/05

DATE:
15 APR 2020

SCALE:
1"=350'

TITLE

NO. DATE
01 15 APR 2020
FIRST SUBMISSION
REVISID

DESCRIPTION