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ATLANTA REGIONAL COMMISSION 40 COURTLAND STREET, NE ATLANTA, GEORGIA 30303

March 9, 2000

Honorable W. David Rogers, Mayor
City of Woodstock
103 Arnold Mill Road
Woodstock, GA. 30188

RE: Development of Regional Impact
Concordia

Dear Mayor Rogers:

Enclosed is some information to update our Development of Regional Impact (DRI) review report on Concordia. When we completed the review, we noted in the report that the Rose Creek Wastewater Treatment Plant had only 0.25 MGD remaining capacity but was in the process of upgrading.

Since that time, we have received the enclosed information from Georgia Department of Natural Resources dated March 3, 2000, and from Cherokee County Water & Sewerage Authority dated March 6, 2000, that the Plant is now officially authorized to operate at 4 MGD. We wanted to provide this updated information so that you would have it as you consider the proposed development.

Please let us know if you have any questions concerning this matter.

Sincerely,

Beverly Rhea
Review Coordinator

Enclosures - 2

C Mr. Geoff Morton, City of Woodstock
Mr. Davie Odom, Concordia Residential, LLC
Mr. Garvis Sams, Jr, Attorney
Ms. Joe Ellen Wilson, HGOR
Mr. Rick Brooks, Georgia DCA
Mr. Harold Reheis, Georgia EPD

Georgia Department of Natural Resources

Environmental Protection Division, Water Protection Branch
4220 International Parkway, Suite 101, Atlanta, Georgia 30354
Permitting, Compliance and Enforcement Program
404/362-2680
FAX: 404/362-2681

March 3, 2000

Mr. Tom Heard, General Manager
Cherokee County Water & Sewerage Authority
Post Office Box 1006
Canton, Georgia 30114

RE: Cherokee County - Rose Creek
Water Pollution Control Plant (WPCP)
NPDES Permit No. GA0046451

Dear Mr. Heard:

Based on the results of the Environmental Protection Division's November 9, 1999 operability inspection, it was determined that the upgrade to the referenced facility has been built in accordance with the approved plans and specifications and the construction was satisfactorily completed. We hereby authorize Cherokee County Water & Sewerage Authority to operate its Rose Creek WPCP in accordance with the B.2. effluent limitations contained in NPDES Permit No. GA0046451.

If you have any comments or questions, please contact Keith V. St. Cyr at 404/362-2680.

Sincerely,



Jeffrey H. Larson, Manager
Permitting, Compliance and Enforcement Program

JHL/kvs



ATLANTA REGIONAL COMMISSION 40 COURTLAND STREET, NE ATLANTA, GEORGIA 30303

February 14, 2000

Honorable W. David Rogers, Mayor
City of Woodstock
103 Arnold Mill Road
Woodstock, GA. 30188

RE: Development of Regional Impact Review
Concordia

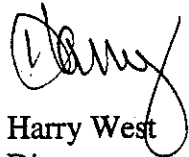
Dear David:

I am writing to let you know that the ARC staff has completed review of the Concordia Development of Regional Impact (DRI). Our finding is that this DRI is in the best interest of the State.

Enclosed is a copy of our review report. Also I am enclosing copies of comments we received from Georgia EPD and the Corps of Engineers during the review.

Please feel free to call us if you have any questions concerning this DRI.

Sincerely,



Harry West
Director

Enclosures

C Mr. Geoff Morton, City of Woodstock
Mr. Dave Odom, Concordia Residential, LLC
Mr. Garvis Sams, Jr. Attorney
Ms. Jo Ellen Wilson, HGOR
Mr. Wayne Shackelford, GDOT
Mr. Rick Brooks, GDCA
Mr. Harold Reheis, GEPD
Mr. David Grabensteder, Allatoona Mgt Office

Facility: **Concordia**
Preliminary Report: **January 28, 2000**
Final Report: **February 14, 2000**

DEVELOPMENT OF REGIONAL IMPACT

REVIEW REPORT

PROPOSED DEVELOPMENT: Proposed development of 438 single-family homes, 236 multi-family units, 383 townhouses, and 160,150 sq.ft. of commercial development on 182.29 acres on the east side of North Rope Mill Road, just north of Little River, City of Woodstock, Cherokee County.

GENERAL

According to information on the review form or comments received from potentially affected governments:

Is the proposed project consistent with the host-local government's comprehensive plan? If not, identify inconsistencies.

Approximately 40 acres (of 182.29) of the proposed development would be annexed into the City of Woodstock. The City of Woodstock and Cherokee County Comprehensive Plans indicate the site for industrial use with commercial uses along Rope Mill Road. However, according to information submitted with the review, the topography of the site does not support industrial development.

Is the proposed project consistent with any potentially affected local government's comprehensive plan? If not, identify inconsistencies.

See above regarding Cherokee County Plan.

Will the proposed project impact the implementation of any local government's short-term work program? If so, how?

No impacts to local short-term work programs were identified in the review.

Will the proposed project generate population and/or employment increases in the Region? If yes, what would be the major infrastructure and facilities improvements needed to support the increase?

According to regional averages, the proposed development could accommodate a population of 1,961, including 477 students, and 320 total jobs.

What other major development projects are planned in the vicinity of the proposed project?

ARC previously reviewed a site on Rope Mill Road across I-575 for a residential development.

Will the proposed project displace housing units or community facilities? If yes, identify and give number of units, facilities, etc.

No. There is only one occupied dwelling unit on the property.

Will the development cause a loss in jobs? If yes, how many.

No.

LOCATION

Where is the proposed project located within the host-local government's boundaries?

The proposed development site is on the east side of North Rope Mill Road just north of Little River and is surrounded on two sides by Allatoona Reservation property. 34°08'/84°31'30"

Will the proposed project be located close to the host-local government's boundary with another local government? If yes, identify the other local government.

Approximately 40 acres of the 182.29 acre site currently are located in unincorporated Cherokee County and are proposed to be annexed into the City of Woodstock.

Will the proposed project be located close to land uses in other jurisdictions that would benefit or be negatively impacted by the project? Identify those land uses which would benefit and those which would be negatively affected and describe impacts.

See previous discussion concerning proposed industrial/commercial land use.

ECONOMY OF THE REGION

According to information on the review form or comments received from potentially affected governments:

What new taxes will be generated by the proposed project?

Information submitted with the review projects a \$148,752,500 build-out value with \$514,684 annual tax revenue.

How many short-term jobs will the development generate in the Region?

400 according to information submitted with the review.

Is the regional work force sufficient to fill the demand created by the proposed project?

Yes.

In what ways could the proposed development have a positive or negative impact on existing industry or business in the Region?

The development would compete with other nearby residential and commercial developments.

NATURAL RESOURCES

Will the proposed project be located in or near wetlands, groundwater recharge area, water supply watershed, protected river corridor or other environmentally sensitive area of the Region? If yes, identify those areas.

In what ways could the proposed project create impacts that would damage or help to preserve the resource?

Watershed Protection

The site proposed for development is located within the Etowah River watershed, a large (over 100 square miles) water supply watershed by Georgia Environmental Protection Division (EPD) Part 5 standards. No minimum EPD criteria for large water supply watersheds apply to this type of development. The site appears to contain headwaters of at least one tributary to Little River. Little River has experienced siltation problems and there is concern about the long-term health of Lake Allatoona; therefore, it will be essential to protect the tributary, river, and lake from further degradation.

Floodplains

Portions of the proposed project site may be located within the 100-year floodplain of tributaries to Little River. Steps should be taken by the City of Woodstock to mitigate potential impacts on these floodplains. The Atlanta Regional Commission's Regional Development Plan policy notes that "all structures that can be damaged or land uses that can impede flood waters or reduce storage volume must be built outside the intermediate region (one percent) flood limits (i.e., outside the 100-year flood limit)."

Georgia Erosion and Sedimentation Act/Stream Buffer Requirements

This act requires that a 25-foot wide natural vegetative buffer be maintained on both sides of streams designated as "State waters." ARC staff recommends that the developer work with the State to determine if the portion of the tributaries located within the proposed site are considered "State waters."

Stormwater/Water Quality

Steps should be taken to limit the amount of pollutants that will be produced during and after construction. During construction, the project should conform to the City's erosion and sediment control requirements. After construction, water quality can be impacted without stormwater pollution controls. The amount of pollutants that will be produced after construction was estimated by ARC staff. ARC's estimates are based on some simplifying assumptions for typical pollutant loading factors (pounds/acre/year). The loading factors are based on the results of regional stormwater monitoring data from the Atlanta Region and relate to entire development.

Estimated Pounds of Pollutants Per Year

| Land Use | Acres | Phosphorous | Nitrogen | BOD | TSS | Zinc | Lead |
|----------------|-------|-------------|----------|----------|-----------|-------|------|
| Commercial | 17.22 | 29.4 | 299.6 | 1,859.8 | 16,927.3 | 21.2 | 3.8 |
| SF Residential | 103.2 | 139.3 | 609.7 | 4,436.3 | 82,639.2 | 35.1 | 8.3 |
| Townhouse/Apt | 61.9 | 65.0 | 662.9 | 4,147.3 | 37,449.5 | 47.0 | 8.7 |
| Total | 182.3 | 233.7 | 1,572.3 | 10,443.4 | 137,015.9 | 103.3 | 20.7 |

Structural Stormwater Controls

If development is approved, the developer should work with the City of Woodstock to mitigate potential impacts. The City should require that the developer submit a stormwater management plan as a key component of the Plan of Development. The stormwater plan should include location, construction and design details and all engineering calculations for all stormwater quality control measures. ARC staff recommends that the City require that any structural controls be maintained at an 80% to 90% total suspended solids removal efficiency. The Plan should also include a monitoring program to ensure stormwater pollution control facilities function properly. ARC staff recommends that structural controls be designed to accommodate the installation, operation and maintenance of automatic equipment at inlet and outlet locations for the monitoring of flow rates and water quality. It is recommended that the monitoring program consider the following minimum elements:

- Monitoring of four storms per year (1 per quarter);
- Collection of flow weighted composite of the inflow to the structure during the entire storm event;
- Collection of a flow weighted composite of the outflow from the structure—the sampling period should include the peak outflow resulting from the storm event;
- Analysis of inflow and outflow flow weighted composite samples for biochemical oxygen demand (BOD), total suspended solids (TSS), zinc, lead, total phosphorous (TP) and total nitrogen (TKN & NO₃); and
- Collection of grab samples at the inlet and outlet locations during the periods of peak inflow and outflow for pH, dissolved oxygen (DO) and fecal coliform bacteria.

The City's Engineering Department should determine the actual number and size of storms to be monitored as well as who should be responsible for conducting the monitoring. Monitoring should be conducted at the developer's or owner's expense. Analysis should conform to EPA standards. Specific monitoring procedures and parameters analyzed may change in the future based on continuing stormwater runoff and water quality studies.

The stormwater plan should require the developer to submit a detailed, long-term schedule for inspection and maintenance of the storm facilities. This schedule should describe all maintenance and inspection requirements and persons responsible for performing maintenance and inspection activities. These provisions and the monitoring program should be included in a formal, legally binding maintenance agreement between the City and the responsible party.

In addition to inspections required in the stormwater management plan, the formal maintenance agreement between the developer and the City should allow for periodic inspections for the stormwater facilities to be conducted by the City. If inadequate maintenance is observed, the responsible party should be notified and given a period of time to correct any deficiencies. If the party fails to respond, the City should be given the right to make necessary repairs and bill the responsible party.

The City should not release the site plans for development or issue any grading or construction permits until a stormwater management plan has been approved and a fully executed maintenance/monitoring agreement is in place.

HISTORIC RESOURCES

Will the proposed project be located near a national register site? If yes, identify site.

See Corps of Engineers comment concerning nomination of the Little River Mill site on Rope Mill Road.

In what ways could the proposed project create impacts that would damage the resource?

Unknown.

In what ways could the proposed project have a positive influence on efforts to preserve or promote the historic resource?

Unknown.

INFRASTRUCTURE

Transportation

How much traffic (both average daily and peak am/pm) will be generated by the proposed project?

Information submitted with the review indicates only 8,435 trips with 869 during am peak and 1,031 during pm peak. ARC's estimates are as follow:

| Land Use | Sq.Ft./Units | Weekday | AM Peak Hour | | PM Peak Hour | |
|----------------|--------------|---------|--------------|------|--------------|------|
| | | | Enter | Exit | Enter | Exit |
| SF Residential | 438 | 4,023 | 76 | 215 | 266 | 143 |
| Townhomes | 383 | 2,040 | 25 | 123 | 124 | 64 |
| MF Residential | 236 | 1,488 | 20 | 99 | 149 | 70 |
| Commercial | 160,151 | 9,222 | 129 | 104 | 411 | 445 |

Trip generation estimates were prepared using the Institute of Traffic Engineers Trip Generation (5th Edition) manual. The estimates do not reflect pass by trip reductions, reductions from transit/carpool/bicycle use or possible additional internal trip capture associated with the mixed-use character of the proposed development.

What are the existing traffic patterns and volumes on the local, county, state and interstate roads that serve the site?

| Facility | 1998 | | | 2010 | | |
|---|-------|--------|-----------|--------|--------|-----------|
| | Lanes | Volume | V/C Ratio | Lanes | Volume | V/C Ratio |
| I-575NB | 4 | 23,316 | .29 | 4 | 34,169 | .42 |
| I-575SB | 4 | 23,292 | .29 | 4 | 33,008 | .41 |
| Towne Lake Pkwy W | 4 | 19,323 | .33 | 4 | 22,081 | .38 |
| Towne Lake Pkwy E | 4 | NA | NA | 4 | 8,390 | .14 |
| Sixes Rd W | 2 | 5,500 | .29 | 4 | 8,106 | .22 |
| Sixes Rd E | 2 | NA | NA | 4 | 22,102 | .59 |
| I-575 HOV(scheduled to open after 2006) | | | | 2(1+1) | 7,650 | .19 |

What transportation improvements are under construction or planned for the Region that would affect or be affected by the proposed project? What is the status of those improvements (long or short range or other)?

Towne Lake Parkway and Sixes Road are scheduled for improvements in the next ten years. Also, an HOV lane is planned for the I-575 Corridor. In addition, various operational improvements are expected throughout the area.

Will the proposed project be located in a rapid transit station area? If yes, how will the proposed project enhance or be enhanced by the rapid transit system?

No.

Is the site served by transit? If so, describe type and level of service.

No.

Are there plans to provide or expand transit service in the vicinity of the proposed project?

Express bus service is expected to be in the area of Towne Lake Parkway or Sixes Road.

What transportation demand management strategies does the developer propose (carpool, flex-time, transit subsidy, etc.)?

To comply with ARC's air quality benchmark, the development includes neighborhood commercial center, street/bike/pedestrian facilities that provide connections between units within the site, to the center and adjoining uses within the site, and that enable connections to future roadways and uses.

What is the cumulative trip generation of this and other DRI's or major developments? Is the transportation system (existing and planned) capable of accommodating these trips?

Based on current data, the traffic analysis suggests that area surface streets will adequately serve the access and mobility needs of motorized vehicle traffic. However, more developments of this size could seriously impact traffic conditions throughout the area.

INFRASTRUCTURE

Wastewater and Sewage

How much wastewater and sewage will be generated by the proposed project?

Total wastewater is projected at 0.336 MGD based on regional averages.

Which facility will treat wastewater from the project?

Information provided during the review indicates that an agreement has been reached on provision of water and wastewater treatment. The City, through agreement with the County, will provide water and wastewater services. Treatment will be done at the County facility but administered by the City. The County's Rose Creek Treatment Plant is in the process of increasing capacity.

What is the current permitted capacity and average annual flow to this facility?

Rose Creek Treatment Plant currently has only 0.25 MGD remaining capacity, but is in the process of increasing capacity.

What other major developments will be served by the plant serving this project?

To be determined.

INFRASTRUCTURE

Water Supply and Treatment

How much water will the proposed project demand?

Again according to regional averages, Concordia could have a water demand of 0.384 MGD.

How will the proposed project's demand for water impact the water supply or treatment facilities of the jurisdiction providing the service?

There should be sufficient water for the development, but water conserving measures are essential in all new developments.

INFRASTRUCTURE

Solid Waste

How much solid waste will be generated by the project? Where will this waste be disposed?

Projections are estimated at 1,375 tons per year on information submitted with the review. Private collection and disposal would be required for the development.

Other than adding to a serious regional solid waste disposal problem, will the project create any unusual waste handling or disposal problems?

No.

Are there any provisions for recycling this project's solid waste.

None stated, but the type of development proposed would provide a very good opportunity for a recycling program and should be encouraged by the City if the development is approved.

INFRASTRUCTURE

Other facilities

According to information gained in the review process, will there be any unusual intergovernmental impacts on:

- **Levels of governmental services?**
- **Administrative facilities?**
- **Schools?**
- **Libraries or cultural facilities?**
- **Fire, police, or EMS?**
- **Other government facilities?**
- **Other community services/resources (day care, health care, low income, non-English speaking, elderly, etc.)?**

Cherokee County Schools will be impacted by the proposed development. While Woodstock Middle and High Schools are below capacity, Woodstock Elementary School is over capacity by 23.1%. The developer should work with the schools to determine if a school site should be on the property or if other accommodations should be made.

HOUSING

Will the proposed project create a demand for additional housing?

The development is mostly housing.

Will the proposed project provide housing opportunities close to existing employment centers?

No.

Is there housing accessible to the project in all price ranges demanded?

Yes.

Is it likely or unlikely that potential employees of the proposed project will be able to find affordable* housing?

Likely.

* Defined as 30 percent of the income of a family making 80 percent of the median income of the Region – FY 2000 median income of \$51,649 for family of 4 in Georgia.



DEPARTMENT OF THE ARMY
MOBILE DISTRICT, CORPS OF ENGINEERS
ALLATOONA PROJECT MANAGEMENT OFFICE
P. O. BOX 487, CARTERSVILLE, GEORGIA 30120
TELEPHONE: 770/382-4700 FAX: 770/386-6758

09 FEBRUARY 2000

Ms. Beverly Rhea
Atlanta Regional Commission
40 Courtland Street, NE
Atlanta, GA 30303

RE: DRI Review, Concordia, Rope Mill Road, City of Woodstock

Dear Ms. Rhea;

Reference your letter of January 28, 2000 and the accompanying DRI information concerning the subject proposed development. We have reviewed the information and wish to make the following observations.

The estimated sewage flow to be generated by the project is .336 MGD. The stated combined remaining capacity of the City of Woodstock and Cherokee County wastewater treatment plants is .29 MGD. It would appear that the combined remaining capacity of the plants is inadequate to serve the proposed development even if there is no increase in flow generated by additional development in the area.

The density of residential development does not appear to be consistent with that of the surrounding area, rather it is much greater. Run-off carrying pollutants from parking areas is a concern. Even with cluster housing, the total number of vehicles will be significant. There will be more than 1050 housing units which will average more than 1 vehicle each. The proposed project is in extremely close proximity to the Little River and at least one of its tributaries. Sedimentation and water quality degradation due to nutrient overloading are already a reality in the Little River. These problems are due, in large part, to run-off from development activities within the watershed. Studies of these problems are ongoing, with a stated goal of restoring the river's water quality and reducing sedimentation. Additional high density developments tend to exacerbate the problems. Should this project be approved as proposed, we are in agreement with the Watershed Protection and Stormwater/Water Quality stipulations put forth in the January 28, 2000 preliminary DRI Review Report. The project should absolutely not be allowed to proceed without formal binding agreements ensuring these stipulations being executed with the developer.

The Little River Mill site on Rope Mill Road has been identified as eligible for designation as a National Register site after consultations between the Corps of Engineers, the Advisory Council, and the Georgia SHPO. As such, it is afforded the same status as a National Register site. While there have been ongoing discussions between the Corps of Engineers and the City of Woodstock for a linear greenway/passive use park in the Little River Mill area, no lease for such a park has been formally requested or acquired by the city as of this date.

Thank you for the opportunity to comment on the proposed development. Questions may be referred to me or to Jim Shinall, Environmental Compliance Coordinator, in this office.

Sincerely,

A handwritten signature in dark ink, appearing to read "David G. Grabensteder".

David G. Grabensteder
Operations Manager



DEVELOPMENT OF REGIONAL IMPACT

DRI-REQUEST FOR COMMENTS

Instructions: The project described below has been submitted to this Regional Development Center for review as a Development of Regional Impact (DRI). A DRI is a development project of sufficient scale or importance that it is likely to have impacts beyond the jurisdiction in which the project is actually located, such as adjoining cities or neighboring counties. We would like to consider your comments on this proposed development in our DRI review process. Therefore, please review the information about the project included on this form and give us your comments in the space provided. The completed form should be returned to the RDC on or before the specified return deadline.

Preliminary findings and comments of the RDC:

Concordia -
See preliminary report

Comments from affected party (attach additional sheets as needed):

Wastewater flows from the development are projected at 0.336 MGD. Currently, the Woodstock WWTP has only 0.04 MGD remaining capacity, and we have received no plans for expansion of the plant. Nearby Rose Creek WWTP is in the process of increasing capacity, which may or may not be enough to serve this development. It is unclear where the necessary treatment capacity will come from.

Individual completing form: JOSH WELTE

EPD - ENGINEERING + TECHNICAL SUPPORT

Local Government: _____

Department: _____

Telephone: ()

Signature: John T. Welte Date: 4.FEB.00

Please return this form to:

Mrs. Beverly Rhea
Atlanta Regional Commission
40 Courtland Street, NE
Atlanta, GA. 30303

Return Deadline: February 10, 2000