



September 8, 1998

Honorable Charles Camp, Mayor
City of Douglasville
P.O. Box 219
Douglasville, GA. 30133

RE: Development of Regional Impact Review--New Manchester

Dear Charlie:

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

I am enclosing a copy of our review report along with copies of comments we received during the review from Douglas County, Douglas County Schools, Cobb County, and the City of East Point. We appreciate the developer working with us to address concerns expressed by these agencies and our staff. Our finding that this DRI is in the best interest of the State is based on the attached information from the developer dated September 2 and September 6, 1998, in addition to the information originally submitted with the DRI. Also, you will note in the review report our comments and recommendations concerning the need for specific plans to protect East Point's water supply both during and after construction.

Please feel free to call me or Beverly Rhea (404-364-2562) if you have any questions concerning our review.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Harry West', is written over a circular stamp. The signature is fluid and cursive.

Harry West
Director

Enclosures

c Ms. Michelle Wright, City of Douglasville
Mr. Larry Evans, New Manchester
Hon. Rita Rainwater, Douglas County
Mr. Samuel E. Land, Douglas County Schools
Hon. Bill Byrne, Cobb County
Hon. Patsy Jo Hilliard, East Point
Mr. Wayne Shackelford, GDOT
Mr. Harold Reheis, GEPD
Mr. Paul Radford, GDCA

Facility: New Manchester
Preliminary Report: July 24, 1998
Final Report: September 8, 1998

DEVELOPMENTS OF REGIONAL IMPACT

REVIEW REPORT

PROPOSED DEVELOPMENT

2,340 acre mixed use community with 12,555,200 sq. ft. office and light warehousing space; 960,000+ sq. ft. retail space; 925,400 sq. ft. hotel space; 2,694 residential units; 4 golf courses; golf school; clubhouse; and civic buildings.

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.

The city has amended their Future Land Use Plan to include the New Manchester site and is in the process of updating the other elements of their comprehensive plan. In addition, the property has been zoned by the City of Douglasville as R-2 PUD with an overlay to allow the New Urbanism Concept.

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

No inconsistencies were identified in the review process. The county expressed a need for an additional fire station and a site is included in the New Manchester plan. Also, the County Schools noted considerable impact and an elementary school site is reserved in New Manchester. In addition, a community center site and a police precinct are included.

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

No.

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?

Yes, the proposed development is projected to accommodate 9,000 residents and 24,980 jobs according to information submitted with the review. Also according to information submitted with the review, planned infrastructure and facilities will support the projected population increase. However, see above comment concerning fire station and schools.

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

None in the immediate vicinity in Douglas County.

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

No.

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 development site is on the Chattahoochee River with Sweetwater Creek running through the site. It is downstream of Camp Creek Parkway, upstream of King Drive.
84°37'30" / 33°42'30"

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.

The site is across the River from Fulton County and is located in Douglas County.

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.

No impacts to adjacent land uses were identified in the review but Douglas County expressed belief that New Manchester will be a positive new development for the county.

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?

At build out, the developer estimates \$17,498,040 property tax, \$43,671,627 inventory tax, and \$4,308,931 capital equipment tax revenue.

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

3,000

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?

While it will compete with existing housing, industry, and business, the development will also serve as a model for the new urbanism concept.

NATURAL RESOURCES

The development site is located on the Chattahoochee River with 3.5 miles of River frontage. Sweetwater Creek runs through the site and there are several unnamed tributaries as well as floodplain and wetland areas on the site. It is New Manchester's intent to avoid development in the floodplain (approximately 480 acres of the 2,340) and wetland areas. In addition, the plan includes very large natural vegetation buffers along the River and the Creek.

Metropolitan River Protection Act

In March, 1998, the Georgia General Assembly passed an amendment to the Metropolitan River Protection Act which extended the Chattahoochee River Corridor from its original downstream end at the City of Atlanta Water Intake near Peachtree Creek to the downstream end of the Atlanta Region. The amended legislation took effect on July 1, 1998, and includes all land within 2000 perpendicular feet of the river from the City of Atlanta Water Intake to the downstream boundaries of Douglas County on the west side of the river and Fulton County on the east, as well as any river 100-year floodplain that extends beyond the 2000-foot Corridor, as mapped by the U.S. Army Corps of Engineers. The legislation also requires the Atlanta Regional Commission to develop and adopt a Plan to protect the Corridor, which must be transmitted to the Corridor local governments by October 1, 1998.

A portion of New Manchester is within the extended Corridor.

The Corridor portion of the property includes all land within the 2000-foot Corridor, as well as the portion of the river's 100-year floodplain that extends up Sweetwater Creek outside the 2000-foot Corridor. Based on the conceptual plans submitted with the DRI, it appears that most of the New Manchester development is located outside the Corridor. Portions of the office and business parks are in the Corridor, as well as parts of the golf courses. However most of the Corridor and floodplain areas are not indicated for development. The proposed Town Center and Phase II areas are completely outside the Corridor.

Information provided on the proposed construction schedule indicate that the Corridor portions of the project would be eligible for grandfathering under Section 12-5-451(5)(A)(ii) of the Metropolitan River Protection Act, so long as construction has started in the Corridor and at least 10 percent of the total estimated construction costs, up to \$100,000, has been spent toward construction by July 1, 1999 (excluding the cost of the land). However, the amount of open space in the Corridor shown on the conceptual plans indicate that the project would probably meet Plan standards if submitted for Corridor review as shown.

While not indicated in any detail, the applicants have indicated that portions of the their land along the river and Sweetwater Creek would be used for recreation. Any recreation or river access areas should conform to all applicable Plan standards, including the 50-foot undisturbed natural vegetative buffer and 150-foot impervious surface setback along the river and the 35-foot undisturbed natural vegetative buffer along tributary streams. These buffers do allow for designated public access to the water, however, this is for the actual access only. Auxiliary uses, such as parking, and other types of recreation uses must be located outside the buffers. While footpaths are allowed in the buffers, these are intended to be unpaved, natural trails. Uses such as bike paths and bikeways must be located outside the buffers (except where crossing tributary streams).

DNR Minimum Planning Standards

Sweetwater Creek provides water supply for the City of East Point and the watershed is considered a large water supply watershed under the Georgia Environmental Protection Division classification. EPD's protection criteria require that new facilities which handle hazardous materials of the types and amount determined by the Department of Natural Resources, shall perform their operations on impermeable surfaces having spill and leak collection systems as prescribed by the Department of Natural Resources.

Storm Water / Water Quality

Impacts to Sweetwater Creek

Sweetwater Creek, a tributary to the Chattahoochee River, flows directly through the proposed project site. The proposed site is adjacent to the water supply intake for the City of East Point which is located on Sweetwater Creek. Water quality in this stream is already threatened by storm water runoff pollution and siltation problems. It is listed in the State's

305(b) report *Water Quality in Georgia 1994-1995* as not supporting designated uses. Listed violations include fecal coliform, lead and copper criteria with urban runoff and municipal facilities as likely causes. Runoff from the proposed site can directly increase the peak flows in Sweetwater Creek contributing to these water quality problems.

Impacts to the Chattahoochee River

The New Manchester project can also have negative impacts on the Chattahoochee River. The proposed site is bordered to the south by the Chattahoochee River. This segment of the Chattahoochee River from Utoy Creek to Pea Creek is listed in the State's 305(b) report *Water Quality in Georgia 1994-1995* as not supporting designated uses due to high fecal coliform, lead and copper levels. The state DNR has listed urban runoff as the primary cause of use impairment in the Chattahoochee as nonpoint source pollution from urban areas. Water quality problems along Sweetwater Creek can further impact water quality in the Chattahoochee River unless appropriate controls are put in place.

Erosion and Sediment Control During Construction

During construction, the project should conform to the City's erosion and sediment control requirements. However, given the vicinity of this development to the City of East Point's raw water supply intake, measures should exceed standard minimum requirements. Steps such as double silt fences can be taken. The City of Douglasville should also require the responsible party to monitor and enforce erosion and sedimentation control procedures.

Storm Water Pollution Loads After Construction

After construction, water quality can be impacted without effective storm water pollution controls. The amount of pollutants that will be produced after construction of the proposed New Manchester Development was estimated by ARC. These estimates are based on some simplifying assumptions for typical pollutant loading factors (lbs/ac/year). The loading factors are based on the results of regional storm water monitoring data from the Atlanta Region. The following table summarized the results of the analysis.

Estimated Pounds of Pollutants Per Year

Land Use	Land Area (acres)	Percent Impervious	TSS	TP	TN	Pb	Zn
Forest/Open	1600	0.5%	376368.56	121.97	958.35	0.00	0.00
Pasture/Cropland	50	0.5%	16335.44	21.78	108.90	0.00	0.00
Medium Density SF	51.60	50%	82518.31	139.01	609.28	8.87	35.49
High Density SF	81.54	60%	151734.05	255.61	1120.33	16.32	65.26
Townhome/Apartment	41.48	75%	36516.19	63.65	646.57	6.70	46.90
Townhome/Apartment	15.00	60%	10904.88	19.01	193.09	2.00	14.01
Commercial	39.99	85%	39292.37	68.49	695.73	7.21	50.47
Office/Light Industrial	457.26	70%	323512.02	591.37	7826.90	69.57	6660.94
TOTAL	2336.87	20%	1037181.84	1280.89	12159.14	110.67	873.07

The City of East Point has expressed concern about this potential impact on their water supply. The developer reports that their representatives have met with the City confirming their commitment to a stormwater management program insuring that the water quality is maintained. It is ARC's understanding that the developer has already begun monitoring water quality upstream of the development in order to assure this. The specifics of their stormwater management plan as stated include wetland enhancement, wetland creation and stormwater management. They state that their strategic engineering and environmental approach to the water quality will be addressed in the following design/mitigation actions:

- ♦ Identify all existing wetlands and obtain jurisdictional determination from the U.S. Army Corps of Engineers
- ♦ Develop comprehensive plans to enhance the quality of wetlands along Sweetwater Creek via the elimination of woody undergrowth, establishment of a consistent hydrologic supply, development of aquatic vegetation areas and development of the littoral shelf areas with wetland vegetation
- ♦ Develop comprehensive plans to create wetland lakes which are located within the tributary drainage channels which supply Sweetwater Creek from the site. These lakes will be utilized to bioremediate surface pollutants from the hardscape areas via wetland vegetation. All surface runoff from the development will be routed through a chain of wetland enhanced hydrologic features to provide the ability to naturally enhance the water quality prior to discharge into Sweetwater Creek and Chattahoochee systems.

Further, they report that the low quality of the existing wetlands in the Sweetwater Creek Basin will provide the ability to greatly enhance the wetlands and improve the quality of the water and that they have no design concepts which will divert runoff from the basin.

Structural Storm Water Pollution Controls

The proposed stormwater pollution controls submitted to ARC staff concerning stormwater pollution controls did not adequately describe the developer's intent. For example, the location of proposed wetlands was not discussed. The stormwater pollution controls should be specifically designed to prevent stormwater runoff pollutants from entering Sweetwater Creek above the City of East Point's raw water supply intake. The Atlanta Regional Commission recommends the following steps be taken.

The City of Douglasville should require that the developer submit a more detailed storm water management plan as a key component of the Plan of Development. The storm water plan should include location, construction design details and all engineering calculations for all storm water quality control measures. ARC staff recommends that the City require that any structural controls be designed to accommodate installation, operation and maintenance of automatic equipment at inlet and outlet location 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 a 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 phosphorus (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 should finalize the 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 and owner's expense. Analysis should conform to EPA standards.

The storm water 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 storm water management plan, the formal maintenance agreement between the developer and The City of Douglasville should allow for periodic inspections of the storm water facilities to be conducted by appropriate City personnel. 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 storm water 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.

Yes, the Sweetwater Manufacturing Site. Properties identified include Adaholt's Ferry site, Ford, Trench Lines, Rock Shelter, Simm's House site, Jones House site, Alexander House site, Mason House site, Mill Office site, Quarry, Kirk House site and Alexander Mill.

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

N/A

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

New Manchester will identify, protect and document or preserve the significant historic sites. Mill Ruins will be stabilized and the developer will assist friends of Sweetwater Creek State Park in realizing their interpretative center. They have also agreed to do an archaeological survey of areas proposed to be disturbed.

INFRASTRUCTURE

Transportation

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

Land Use	Sq. Feet or units	Weekday	AM Peak Hour		PM Peak Hour	
			Enter	Exit	Enter	Exit
Office*	12,555,000 sq. ft.	54,301	7,725	1,053	2,406	11,748
Retail	960,000 sq. ft.	29,186	375	240	1,341	1,453
Hotel	914 rooms	7,809	388	248	353	313
4 Golf Courses	72 holes	2,573	126	34	87	110
Residential	2,694 units	19,486	342	1,275	1,212	656
Total		113,354	8,957	2,851	5,399	14,269

These trip generation estimates were prepared using the Institute of Traffic Engineers Trip Generation (6th Edition) manual calculated as all office since there was not a detailed breakdown of office/light warehousing. Because of the new urbanism concept, mix of uses and transportation alternatives proposed, the developer estimates 60,773 trips.

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

The site has access from I-20 via Fulton Industrial Boulevard, Riverside Parkway, Six Flags Road, Thornton Road and Lee Road. Camp Creek Parkway accesses the property from I-285 and directly from Atlanta Hartsfield International Airport.

The following volumes are based on 1997 GDOT coverage counts from area facilities that will likely provide the primary routes for traveling to the proposed development. 2010 volumes for these facilities were obtained from the ARC transportation model.

Facility	1997			2010		
	Lanes	Volume	V/C Ratio	Lanes	Volume	V/C Ratio
Riverside Pkwy from Summer Rd to Camp Creek Pkwy	2	3,100	.1	2	7,400	.3
Riverside Pkwy from SR 92 to Summer Rd	2	3,200	.1	2	7,400	.3
Camp Creek Pkwy from Chattahoochee River to Riverside Pkwy	4	23,000	.3	4	73,000	1.0
Camp Creek Pkwy from Riverside Pkwy to Linda Lane	4	20,100	.3	4	50,400	.9
SR 92 from Riverside Pkwy to Lake Monroe Rd	2	15,600	.6	4	26,000	.6
SR 92 from SR 166 to Old Lower River Rd	4	3,900	.1	4	12,300	.3
SR 166 from Old Lower River Rd to Chattahoochee River	2	9,900	.4	2	22,100	.9
I-20 from Fulton County to Thornton Rd	8	103,100	.7	8	127,000	.8

The traffic analysis suggests that currently low levels of traffic on area facilities will increase substantially by 2010, leaving adequate roadway capacity. However, the proposed development is of such a massive scale that, if built as planned, area conditions would likely be substantially worse than projected in the above analysis.

In addition, the county stated that the City of Douglasville will be required to assume maintenance of Riverside Parkway commencing with the construction of New Manchester.

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)?

The ARC's adopted Interim Atlanta Regional Transportation Plan: 2020 and Interim Atlanta Regional Transportation Improvement Program FY 1999 - FY 2001 includes the following projects in the vicinity of the site.

ARC #	Description	Type	Status
DO 019	SR 166 FM OLD LOWER RIVER RD TO SR 70 IN FULTON CO	2 -> 4	CST long range
DO 028	SR 92 FM S OF SR 166 NE TO LAKE MONROE RD	2 -> 4	CST FY 2000
DO-AR 208	SR 92 @ I-20: ADD DUAL L TURN LNS EB I-20, L TURN LN WB I-20	INTCHG	CST long range

The Atlanta Region Bicycle and Pedestrian Walkways Plan, 1995 Update include no projects in the vicinity of the site. However, the developer will link all uses with pedestrian and bicycle paths, including access across Sweetwater Creek and Riverside Parkway. They will also connect all areas of the development and future development with pedestrian and bicycle paths.

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; however, a shuttle is planned from the development to a MARTA transit station.

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

No; however, the developer will coordinate and make plans for turn around areas for future transit buses and will coordinate with and encourage Douglas County's Rideshare Program.

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

Not at this time.

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

The developer has agreed to conduct a transportation needs study as build out of the business park is completed.

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

The traffic analysis suggests that substantial increases in the currently low levels of traffic on area facilities will leave adequate roadway capacity. However, the proposed development is of such a massive scale that, if built as planned, area traffic conditions would likely be substantially worse than projected in this analysis. For this reason, significant area operational improvements may be required. Improvements to serve alternate modes of transportation will be key to preserving mobility and access in the area and at the site. For this reason the developer has agreed to:

- pedestrian and bicycle facilities linking all uses at each development area;
- pedestrian and bicycle facilities providing safe and direct access between each of the development areas;
- adequate bus turnaround areas to allow each of the development areas to be served by transit buses if such service were to become available at some future point.

Transportation demand measures (TDM) are proposed to be implemented following a transportation needs study as build out of the business park occurs. Current plans (which may change based on the needs study) include:

- shuttle service between development areas and key locations such as the Arbor Place Mall site and MARTA;
- employer based measures such as ridematching, preferential parking for HOV carpools, flex time, telecommuting, and van pool subsidies.
- a Transportation Management Association for the site which could be an effective way to implement such measures. (ARC's Commute Connections is available free of charge to explore TDM options and implementation strategies.)

Additionally, the developer will coordinate with Douglas County Transit on feasibility of serving the site with the county's van based transit program.

INFRASTRUCTURE

Wastewater and Sewage

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

1.1 MGD

Which facility will treat wastewater from the project?

Sweetwater Creek Wastewater Treatment Plant is located within the development site boundaries and a 48" transmission line runs along the River from the Plant to a point perpendicular to Echo Road.

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

3.0 MGD with future plans to expand to 12.0 MGD.

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

None that ARC has reviewed. However, New Manchester may stimulate additional development in the area creating the need for plant expansion beyond the currently proposed 12 MGD. ARC staff recommends that adequate land be acquired now by the Douglasville-Douglas County Water and Sewer Authority for long range future expansions

to meet build out conditions in the county. All future expansions of the Plant will be required to meet Metro River Protection Act and Chattahoochee Corridor Plan standards. Therefore, the standards must be taken into account in planning future layouts before surrounding development landlocks the facility and prevents future expansion consistent with the Act/Plan.

INFRASTRUCTURE

Water Supply and Treatment

How much water will the proposed project demand?

1.4 MGD.

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

Water is available in a 16" line along the length of the property on the south side of Riverside Parkway.

INFRASTRUCTURE

Solid Waste

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

25,714 tons per year - disposal capacity accounted for in recent Douglasville Solid Waste Management Plan.

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 recycling would be expected in a development of this type.

INFRASTRUCTURE

Other facilities

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

- Levels of governmental service?
- 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.)?

Many civic facilities, including a 40-classroom school site, town hall, library, fire and police station, are planned as a part of this development.

HOUSING

Will the proposed project create a demand for additional housing?

Yes.

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

The development provides housing and jobs, but more employees than can be housed within the development.

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

Yes, in limited supply.

Is it likely or unlikely that potential employees of the proposed project 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. 1996 median family income of \$52,100 for Atlanta MSA.



DOUGLAS COUNTY BOARD OF COMMISSIONERS

8700 Hospital Drive • Douglasville, GA 30134 • Telephone (770) 920-7266 • Fax: 920-7357

JOHNNY GROOVER

District I

RITA RAINWATER

Chairman

BARBARA GLORE

District III

CLAUDE ABERCROMBIE

District II

BILL ASH

District IV

July 30, 1998

Ms. Beverly Rhea, Review Coordinator
Atlanta Regional Commission
200 Northcreek, Suite 300
3715 Northside Parkway
Atlanta, Georgia 30327-2809

Dear Beverly:

We have received the Development of Regional Impact (DRI) application and preliminary report for New Manchester. The DRI application and ARC preliminary report state that the New Manchester development is in conformance with the City of Douglasville's Comprehensive Plan. However, the City of Douglasville does not have a Comprehensive Plan that applies to property in unincorporated Douglas County.

Douglas County provides fire protection to both the City of Douglasville and Douglas County. Adequate fire protection is not available to provide service to existing development in the area and New Manchester without construction of an additional fire station. This new fire station should be located at the eastern boundary of New Manchester.

The Douglas County Public Works Department currently maintains Riverside Parkway. The City of Douglasville will be required to assume maintenance of Riverside Parkway commencing with the construction of New Manchester. Any shuttle service from MARTA into Douglas County should also be coordinated through the Board of Commissioners and our TCC representative.

The Board of Commissioners believes New Manchester will be a positive new development for Douglas County. The New Manchester plans for a neo-traditional development is an exciting alternative for residential, office and retail/resort development. The Board of Commissioners supports approval of the DRI application for New Manchester.

Sincerely,

Rita Rainwater, Chairman
Douglas County Board of Commissioners



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:

New Manchester - see enclosed preliminary report

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

It is apparent that the New Manchester Project will have a considerable impact on the Douglas County School System. Without specific information as to the number and type of family dwellings it is impossible to determine the number of students to anticipate. I am unsure as to whether lots equal houses and apartments. The formula used to project numbers of students is based on the rent structure of apartments and the number of houses in a particular project. Please contact me if more specific information is available.

Samuel E. Land, Assistant Superintendent
Operations & Personnel
Douglas County School System

(770) 920-4020 FAX (770) 920-4027

Individual completing form: _____

Local Government: _____

Department: _____

Telephone: () _____

Signature: _____ Date: _____

Please return this form to:

MRS. BEVERLY RHEA
ATLANTA REGIONAL COMMISSION
3715 NORTHSIDE PARKWAY
200 NORTHCREEK, SUITE 300
ATLANTA GA 30327-2809

Return Deadline: August 7, 1998



BOARD OF COMMISSIONERS

100 Cherokee Street, Suite 300
Marietta, Georgia 30090-9680

Phone: (770) 528-3300 Fax: (770) 528-2606

Bill Byrne
CHAIRMAN

August 7, 1998

Mrs. Beverly Rhea
Review Coordinator
Atlanta Regional Commission
200 Northcreek, Suite 300
3715 Northside Parkway
Atlanta, Georgia 30327-2809

RE: Development of Regional Impact
New Manchester Project
Douglasville, Douglas County, GA

Dear Mrs. Rhea:

Thank you for forwarding the Request for Comments on the New Manchester Project in Douglasville, Georgia which has been classified as a Development of Regional Impact. We offer the following comments for consideration by the Atlanta Regional Commission.

I. Impact on Chattahoochee River

According to preliminary site plans, the New Manchester site is contiguous to over three miles of the Chattahoochee River. We recommend that the developer, at a minimum, adheres to the provisions of the Metropolitan Rivers Protection Act and if possible, exceed the buffering and impervious surfaces protective measures. This will help to insure the continued health of the Chattahoochee River and its environs.

II. Impact on Historic Resources

The New Manchester site has a significant history due to its importance as an early Georgia manufacturing site and the textile plant's role in the Civil War. We encourage and applaud the preservation and interpretative projects as proposed by the developers of New Manchester. We also encourage archeological surveys of the flood plain and wetland areas adjacent to the Chattahoochee River and its tributaries that may yield information pertaining to Native American inhabitants for further preservation and interpretation.

Board of Commissioners

BILL BYRNE, Chairman

WILLIAM A. COOPER, District 1

JOE L. THOMPSON, District 2

GORDON J. WYSONG, District 3

GEORGE WOODY THOMPSON, JR., District 4

*An Equal Opportunity Employer
Printed on recycled paper*

Mrs. Beverly Rhea
Atlanta Regional Commission
Page 2

III. Impact on Transportation

Based on projected transportation estimates, the New Manchester development will create an additional 60,773 daily trips at full twenty year build out. Due to the close proximity to Cobb transportation corridors such as Interstate 20, Thornton Road, and Six Flags Drive, we have a concern with the projected increase in traffic. We encourage the development of traffic mitigation procedures, including shuttles to mass transit stations and park and ride lots along with pedestrian friendly retail and service centers which would minimize trip frequency and lengths.

IV. Impact on Water and Wastewater Treatment Resources

According to Pete Frost, manager of the Douglasville - Douglas County Water and Sewer Authority, they have adequate capacity to handle the water delivery and wastewater treatment needs of the New Manchester project. As such, we find no impact on Cobb County.

In conclusion, we look forward with great interest to the twenty year development of the New Manchester project. We appreciate the opportunity to provide our comments for your consideration.

Sincerely,

A handwritten signature in dark ink, appearing to read "Bill Byrne", with a long, sweeping horizontal line extending to the right.

Bill Byrne, Chairman
Cobb County Board of Commissioners



City of East Point

Georgia

2777 EAST POINT STREET
EAST POINT, GEORGIA 30344
404-765-1000

COUNCIL MEMBERS

JOHNNY FOWLER RUSSELL A. "TONY" WIDENER	WARD A
TIMOTHY COOPER PAT G. LANGFORD	WARD B
BARBARA C. BROWN MELVIN A. PITTMAN	WARD C
THREET BROWN C. ANN DOUGLAS	WARD D

PATSY JO HILLIARD
MAYOR

FRED H. HAYS
CITY MANAGER

August 20, 1998

Mrs. Beverly Rhea
Atlanta Regional Commission
200 Northcreek, Suite 300
3715 Northside Parkway
Atlanta, GA 30327-2809

Re: Proposed New Manchester

Dear Beverly:

The City of East Point would like to thank the Atlanta Regional Commission for this opportunity to comment on the proposed development known as New Manchester. While a project of this significance certainly is worthy of consideration for any jurisdiction, the health and welfare of affected citizens within the affected region are of primary importance.

Our staff and City Attorney have attended meetings as recently as August 13, 1998 to obtain more information about New Manchester. Our previous attempts to obtain information through the City of Douglasville were met with resistance causing our City Attorney to acquire information about the project through the Open Records Act.

Our interest is, primarily, the impact of such a project on our water supply. As you are aware, our reservoir is located in Douglas County on Sweetwater Creek, just upstream of the proposed project. Our intake is located south of the reservoir before Sweetwater Creek merges with the Chattahoochee River. It is our understanding that the project surrounds our intake and it is also our understanding that the project will include a new Town Center, business park, office park and four (4) golf courses. All of these uses will affect our water supply.

For these reasons, the City of East Point is seriously concerned over the proposed development known as New Manchester, and desires the opportunity to present these concerns to the Commission.

Very truly yours,

Mayor Pasty Jo Hilliard

PJH/ja

copy: City Manager and City Council Members

Courtesy Is Our Specialty: Honesty and Efficiency Our Goal



August 28, 1998

Mr. Larry Evans, Architect & Town Planner
New Manchester
807 Dartmouth
Brunswick, Georgia 31520

FAX to 912-262-9404

RE: Development of Regional Impact Review
New Manchester

Dear Larry:

I am writing to let you know the remaining items we would like New Manchester to address before we complete the Development of Regional Impact (DRI) review. We have discussed most of these at some point, but we do not have specifics in writing.

The first item is New Manchester's commitment to mixed uses and alternative modes of transportation. Because of the potential number of trips and resulting emissions that New Manchester could generate, we would recommend the following in addition to what has already been stated in the DRI submittal:

- specific commitment to have at least ten percent of the total floor area in the development as retail space
- pedestrian and bicycle facilities linking all uses within each development area
- pedestrian and bicycle facilities providing safe and direct access among each of the development areas, including grade separated facilities where needed across Riverside Parkway and access across Sweetwater Creek
- pedestrian and bicycle facilities along all external road frontages to connect to existing or possible future area facilities
- coordination with Douglas County's Rideshare program
- adequate bus turnaround areas to allow each of the development areas to be served by transit buses if such service were to become available at some future time

Another transportation recommendation would be that New Manchester commit to conduct and/or fund a transportation needs assessment study as buildout of the business park is completed. This study would identify any existing or potential transportation related problems and propose solutions to those problems. Solutions could include the creation of a Transportation Management Association (TMA), a Community Improvement District (CID), specific infrastructure needs, and/or transportation demand management programs like shuttles both within the area and to specific points such as Arbor Place Mall and transit connections. (TMA's typically include employer based measures such as ridematching, preferential parking for HOV carpools, flex time, telecommuting, and vanpool subsidies.)



Page 2
Mr. Evans
August 26, 1998

In addition to the above transportation items, we want to be sure that future plans for Sweetwater Creek Wastewater Treatment Plant will be possible. Current plans are for the Plant eventually to expand to 12 MGD. The Plant is located in the Chattahoochee River Corridor and will be required to meet Chattahoochee Corridor Plan standards for this expansion to 12 MGD (or larger if necessitated by buildout of the County). Therefore it is important for Douglasville-Douglas County Water & Sewer Authority and New Manchester to assure that sufficient land is available for such expansion(s), including buffers from surrounding development.

Concerning historical and archaeological resources, we are aware of New Manchester's commitment to protection of identified resources. In addition, Cobb County encourages an archaeological survey of the flood plain and wetland areas adjacent to the Chattahoochee River and its tributaries.

We also received a review comment from the City of East Point in which they express concern about protection of their water quality. As you know, the City's intake is south of their reservoir at a point before Sweetwater Creek merges with the Chattahoochee River. We are aware of the wide buffers that New Manchester plans along the Creek, but we need additional information on controls that will be put in place to prevent stormwater runoff pollutants from entering the creek above East Point's intake yet maintain adequate flow in the creek for the intake.

Finally, we would request that New Manchester let us know if any substantial changes have been made to the plans or information in the DRI submittal.

We would like to have a response by September 4, 1998, if possible. If that is not possible, or if you have any questions about our request, please feel free to call me at 404-364-2562.

Sincerely,

A handwritten signature in cursive script, reading 'Beverly Rhea', is written over a horizontal line.

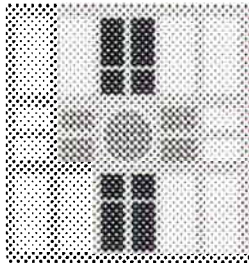
Beverly Rhea
Review Coordinator

c Honorable Charles Camp, City of Douglasville
Mr. Mark Nelson, PBSJ

September 2, 1998

VIA FACSIMILE AND US MAIL

new
PLACE
companies



Ms. Beverly Rhea
Review Coordinator
Atlanta Regional Commission
200 Northcreek / Suite 300
3715 Northside Parkway
Atlanta, Georgia 30327-2809

Re: New Manchester / City of Douglasville

Dear Ms. Rhea,

I have attached responses to your letter of August 28, 1998, concerning the additional items to be addressed in the DRI process.

Please call me with your questions or comments.

Sincerely,

The New Manchester Company

F. Larry Evans
Architect and Town Planner

Cc: Ron Orr
City of Douglasville

HISTORIC PLANNING AND DEVELOPMENT
807 Dartmouth Street / Brunswick, Georgia 31520
912-262-0085 / 912-264-2494 / fax 912-262-6404

Response to Atlanta Regional Commission Letter of August 28, 1998

Commitment to mixed uses

New Manchester will have a minimum of ten per cent (10%) of its development as retail use.

Pedestrian and bicycle paths

New Manchester will link all uses with pedestrian and bicycle paths. Safe pedestrian and bicycle access across Sweetwater Creek and Riverside Parkway will be provided. New Manchester will connect all areas of the development and future development with pedestrian and bicycle routes, but these will not necessarily be along external road frontages.

Douglas County Rideshare Program

New Manchester will coordinate with and encourage Douglas County's Rideshare Program.

Transit buses

New Manchester will coordinate and make possible turn around areas for transit buses in its development plan.

Transportation Needs Study

New Manchester will conduct a transportation needs study as the build-out of the business park is completed.

Sweetwater Creek Wastewater Treatment Plant

See attached letter from Douglasville-Douglas County Water and Sewer Authority verifying expansion capacity and commitment of the Sweetwater Creek Wastewater Treatment Plant.

Archaeological Survey

New Manchester will protect the Archaeological resources of the site. Surveys and documentation will be done in areas to be disturbed.

Sweetwater Creek water quality

Representatives from New Manchester have met with the City of East Point confirming our commitment to a storm-water- management program insuring that the water quality of Sweetwater Creek is maintained. Attorneys representing the City of East Point have attended the New Manchester Planning and Zoning public hearings beginning in 1997. The attorneys have also had meetings with City of Douglasville staff concerning their intake.

HISTORIC PLANNING AND DEVELOPMENT

807 Dartmouth Street / Dunwoody, Georgia 31520
912-262-0085 / 912-264-2494 / fax 912-262-6404

New Manchester intends to improve the quality of water in Sweetwater Creek through wetland enhancement, wetland creation and stormwater management. Our strategic engineering and environmental approach to the water quality of this site will be addressed in the following design/mitigation actions:

- Identify all existing wetlands and obtain jurisdictional determination from the U.S. Army Corps of Engineers.
- Develop comprehensive plans to enhance the quality of wetlands along Sweetwater Creek via the elimination of woody undergrowth, establishment of a consistent hydrologic supply, development of aquatic vegetation areas and development of the littoral shelf areas with wetland vegetation.
- Develop comprehensive plans to create wetland lakes which are located within the tributary drainage channels which supply Sweetwater Creek from the site. These lakes will be utilized to bioremediate surface pollutants from the hardscape areas via wetland vegetation. All surface runoff from the development will be routed through a chain of wetland enhanced hydrologic features to provide the ability to naturally enhance the water quality prior to discharge into Sweetwater Creek and Chattahoochee systems.

The low quality of the existing wetlands in the Sweetwater Creek Basin will provide the ability to greatly enhance the wetlands and improve the quality of the water. The quality of water which is available to The City of East Point will not be affected by this development. We have no design concepts which will divert runoff from that basin.

Development plan changes

New Manchester is continuing with development planning, but no substantial changes have been made that would affect the DRI Application.



PATSY JO HILLIARD
MAYOR

FRED H. HAYS
CITY MANAGER

City of East Point

Georgia

2777 EAST POINT STREET
EAST POINT, GEORGIA 30344
404-765-1000

COUNCIL MEMBERS

JOHNNY FOWLER RUSSELL A. "TONY" WIDENER	WARD A
TIMOTHY COOPER PAT G. LANGFORD	WARD B
BARBARA C. BROWN MELVIN A. PITTMAN	WARD C
THREET BROWN C. ANN DOUGLAS	WARD D

September 4, 1998

Mr. Harry West
Executive Director
Atlanta Regional Commission
200 Northcreek, Suite 300
3715 Northside Parkway
Atlanta, GA 30327

Subject: New Manchester Development
City of Douglasville, Douglas County

Dear Mr. West:

The City of East Point appreciates the opportunity to comment on the proposed development of a neo-traditional "town" in the City of Douglasville. As you know, the City of East Point receives its raw water from Sweetwater Creek in Douglas County and the City's raw water intake is located on Sweetwater Creek, close to the Chattahoochee River. This location also is within the proposed New Manchester development.

The City has met with representatives of the developer and their engineers and was promised that the development would implement environmental controls to protect the water quality in Sweetwater Creek to assure that the new development would not add to a degrading water quality. To protect this stance, the developer has instituted water quality testing just upstream from the development boundary (which also is the southern boundary of Sweetwater Creek State Park). The developer also promised various water quality control measures to protect the City's raw water intake.

The City of East Point supports environmentally sensitive developments and wants to support the New Manchester development provided that the City's water quality concerns are met.

The City of East Point requests that any approval of the development will contain the following conditions:

1. The development needs to follow environmental planning criteria published by the Georgia Environmental Protection Division for small watersheds (less than 100 square miles).

Courtesy Is Our Specialty; Honesty and Efficiency Our Goal

RECEIVED
SEP 8 1998
ARC

Although the Sweetwater basin is larger than 100 square miles, the fact that the intake is directly within the development justifies this request.

2. The developer's promise to protect the water quality needs to be supported by modeling of water quality and specific identification of Best Management Practices (BMPs) to protect water quality. The model has to demonstrate that proposed BMPs do indeed protect water quality.
3. It should be expected that the worst impact may be during construction. Erosion and Sedimentation control measures should receive special scrutiny and exceed minimum standards. Steps such as double silt fences certainly appear appropriate to protect water quality.
4. The City of East Point requests that the above conditions become a permanent covenant that stays with the land to assure that potential successors to the current developer will be bound to the above conditions.
5. The City of East Point would like to be afforded the opportunity to discuss with the developer the possibility of the construction of a jointly owned reservoir to augment the City's raw water supply. This reservoir, of course, would be a visual amenity.
6. The City of East Point would prefer to own directly dedicated natural areas and buffers in lieu of ownership by a non-profit organization.

Again, we appreciate the opportunity to comment on this regionally significant development. Please do not hesitate to call me or David Lackey, our Director of Community Services, should there be additional questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Patsy Jo Hilliard", written over a light blue rectangular background.

Patsy Jo Hilliard
Mayor
City of East Point

PJH:sb

September 6, 1998

VIA FACSIMILE AND US MAIL

Ms Beverly Rhea
Review Coordinator
Atlanta Regional Commission
200 Northcreek / Suite 300
3715 Northside Parkway
Atlanta, Georgia 30327-2809

Re: New Manchester / City of Douglasville

Dear Ms Rhea,

I received from you a copy of the letter from the City of East point dated September 4, 1998

Our letter of September 2, 1998, again states our commitment to prevent negative impact from our site to the City of East Point water intake. We will meet all Corp of Engineer's, EPD and Soil and Erosion permit requirements.

The City of East Point has been aware of our commitment to maintain or improve the water quality since our initial Planning and Zoning hearing in Douglas County in 1997. We will continue dialog with the City of East Point to comfort them that New Manchester will not harm the quality of their raw water source

Please call me with your questions or comments.

Sincerely,

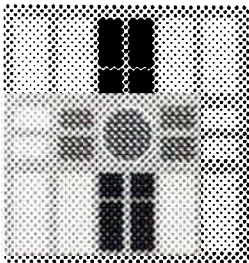
The New Manchester Company

F. Larry Evans
Architect and Town Planner

Cc: Ron Orr
City of Douglasville

HISTORIC PLANNING AND DEVELOPMENT
307 Dartmouth Street / Brunswick, Georgia 31520
912-262-0055 / 912-284-2494 / fax 912-282-2404

new
PLACE
companies



UNSOLICITED COMMENTS

Linda Stauffer
2371 Strawn Road
Winston, Georgia 30187-1470
(770) 942-9522
August 21, 1998

ARC

Beverly Rhea
3715 Northside Parkway
200 Northcreek, Suite 300
Atlanta, Ga. 30327-2809

Re: New Manchester DRI

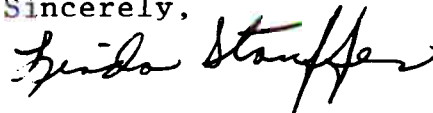
Dear Beverly Rhea,

The proposed New Manchester development will have a negative impact on Douglas County and degrade the image of Georgia in general.

Nine thousand people on 3,240 acres will over burden the natural resources in Douglas County. Water, sewer, and roads will not be able to accomadate such a large, immediate, influx of people. Eventhough, this will be a self contained community, this development will still depend on services that are barely adequate for the present population and the everyday expected developments. This huge development will over tax an already struggling stable community. Taxes will surely rise to accomadate the needed infrastructure.

Growth that is not well managed will not strengthen the good image of Georgia. A project of this size will not be able to be managed well by either the city of Douglasville nor the Douglas County government. Present development of the mall has proven this. Arbour Station community has been disrupted with the blasting and flooding problems.

Sincerely,

A handwritten signature in cursive script, appearing to read "Linda Stauffer".

Spencer's Pond
Preserved

SWEETWATER CREEK STATE PARK



- CORPORATE CAMPS
- CHURCH
- HOTEL/RESORT
- COMMERCIAL
- OFFICE/INDUSTRIAL
- LIGHT INDUSTRIAL
- PUBLICATION
- DETACHED SINGLE FAMILY
- ATTACHED SINGLE FAMILY
- MULTIFAMILY
- LOW DENSITY RESIDENTIAL
- PERMANENT GREEN SPACE/UTILITIES
- FLOOD PLAIN

NEW MANCHESTER

ADJUDICATION OF
 NEW MANCHESTER, LLC

F. LARRY EVANS, ARCHITECT

BUSINESS PARK & OFFICE PARK PLANNING
 FOWLER DESIGN ASSOCIATES, LTD.
 ARCHITECTURE INTERIOR DESIGN LAND PLANNING
 HIA # 98005 (0)

JUNE 26, 1996

SITE PLAN
 SCALE: 1" = 1,500'-0"

