

file copy

Atlanta Regional Commission
200 Northcreek, Suite 300
3715 Northside Parkway
Atlanta, Georgia 30327-2809



Harry West
Director

November 1, 1999

Honorable Jim Joyner, Chairman
Henry County Commission
345 Phillips Drive
McDonough, GA. 30253

RE: Development of Regional Impact
Eagle Creek

Dear Jim:

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

Enclosed is a copy of our review report. I am also enclosing a copy of comments we received from the Henry County Board of Education.

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

Sincerely,

Harry West
Director

C Mr. Tim Young, Henry County Planning & Development
Mr. David Williams, Killearn, Inc.
Mr. David Chatham, Chatham Holdings, Inc.
Mr. Steve Moore, Moore, Bass, & Bibler, Inc.

Facility: **Eagle Creek**
Preliminary Report: **September 13, 1999**
Final Report: **November 1, 1999**

DEVELOPMENTS OF REGIONAL IMPACT

REVIEW REPORT

PROPOSED DEVELOPMENT: Mixed use development consisting of 1,048 single-family homes, 848 units multi-family residential development, 1,011,600 square feet of commercial space, 409,000 square feet of office space, and 240,000 square feet of industrial space. The site is on the southwest side of I-75 and the north side of Hampton Locust Grove Road.

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.

Not entirely consistent. The Henry County Comprehensive Plan future land use map projects agriculture, residential, industrial, and commercial/services in the areas covered by and near the Eagle Creek development, with some uses corresponding in location and others not. However, due to growth in the County, the County is proposing a complete update of the Comprehensive Plan in 2000-2001. This update is included in the County's Short-Term Work Program Update currently under review by ARC. Also included in the STWP Update is industrial and commercial recruitment.

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

The site proposed for development is surrounded by the rapidly growing McDonough area to the northeast, Locust Grove with the Tanger Outlet to the southeast, and Hampton with the Atlanta Motor Speedway to the west. Consistent with ARC *Regional Development Plan* policies, Eagle Creek strengthens the residential and mixed-use character of this McDonough-Hampton-Locust Grove emerging activity center and it also protects environmentally sensitive areas.

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

No impacts to local government 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?

The proposed development could accommodate a population of 3,892 including 1,003 students and 3,686 jobs, all based on regional averages. Information submitted by the County indicates that the

Henry County Water and Sewerage Authority is in the final design and easement acquisition stage for a 42-inch interceptor sewer along the Bethlehem Bottoms Corridor and that the County is planning to improve and extend Lester Mill Road where a 42-inch water transmission main will occupy the same right-of-way. Also a new 1.5 MGD Luella wastewater treatment plant which would serve the site is under construction.

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

ARC previously reviewed most of this site (as Southgate) as well as the Nestle's warehousing development, Welch commercial development, and Racetrack Road PUD northeast and across I-75, Gone with the Wind, Adams Subdivision, and Westridge, all three northwest, and the Atlanta Motor Speedway expansion and related development to the west.

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 proposed development site is on the southwest side of I-75 both north and south of Bethlehem Road with portions extending south to Hampton Locust Grove Road. 33°22'30"/84°10'

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 near but not contiguous to the Cities of Locust Grove, McDonough, and Hampton.

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.

The site proposed for development is not contiguous to any other jurisdiction. The nearest city is Locust Grove which extends almost to the southeastern tip of this DRI. Tanger Outlet Center is located diagonally across I-75/Hampton-Locust Grove Road.

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?

The Killearn portion of Eagle Creek which includes the 1,896 residential units as well as the industrial and part of the commercial development is expected to generate \$428,072 annual property tax based on \$292,000,000 build-out value. The Chatham portion of the development which includes the office space and part of the commercial development is expected to generate approximately \$1,000,000 based on \$83,000,000 build-out value.

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

The number of short-term jobs will depend on the construction schedule. The number of long-term jobs the development could generate is 3,686 based on regional averages.

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 general area of the proposed development is a rapidly growing emerging activity center including three town centers. Eagle Creek's golf course, multi-family residential units, and office space will add to the existing mix of single-family, industrial, and retail outlet in the area.

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?

The land proposed for development includes branches of Indian Creek and Bethlehem Bottoms, a tributary to Indian Creek. It is located just upstream from the Gardner Reservoir on Indian Creek. Below the reservoir, Indian Creek feeds into the Towaliga River system; therefore, this is also part of the Towaliga watershed as well as part of the Indian Creek watershed. Indian Creek is a small water supply watershed and Henry County has a watershed protection ordinance that has been approved by the Georgia Department of Community Affairs as meeting the Georgia Environmental Protection Division Part 5 requirements. The ordinance establishes water supply critical areas and limited development areas. The ordinance establishes stream buffers, lot sizes, amounts of impervious surface,

and limits on certain activities in the watershed. It appears that Eagle Creek can meet the watershed ordinance requirements. However, the development is proposing some single-family residential lots smaller than the ordinance states as required size (1.5 acres in the water quality critical area and 0.5 acres in the limited development area), but the development proposes to offset this with the open space, buffers, and golf course. The ordinance allows for variances and the County must decide whether to approve such variance. Also, if approved, it will be important for the Henry County staff to closely monitor permitting to assure continual compliance.

The site contains some 100-year floodplain areas of Indian Creek as well as a tributary to Indian Creek. Imposition of impervious surface within floodplain zones can adversely affect hydrologic patterns at both downstream and upstream locations. These effects include increasing of flood height and duration, as well as return period of particular flow stages. Therefore, ARC staff recommends the development be restricted to areas outside the 100-year floodplain .

As indicated by the site plan, a portion of the proposed development includes areas delineated as wetlands. Wetlands are known to play an important role in the maintenance of stream water quality, as well as to serve as links between terrestrial and aquatic ecological systems. Imposition of development and construction in wetland areas can significantly impact wetland ecological function, water storage capabilities, and water quality control functions. ARC staff therefore recommends that all development be kept out of any delineated wetlands and that vegetated buffers be required around wetlands.

Stormwater/Water Quality

During construction, the project should conform to established erosion and sediment control requirements as mandated by the Henry County Soil Erosion and Sedimentation Control Ordinance as well as any other applicable regulations. Additionally, steps should be taken to limit the amount of pollutants that will be produced during and after construction.

ARC staff estimated the amount of general pollutants that will be produced after construction of the proposed development. These estimates are based on some simplifying assumptions for typical pollutant loading factors (lbs/ac/yr). The loading factors are based on the results of regional stormwater monitoring data from the Atlanta region. The following table summarizes the results of this analysis.

Land Use	Estimated Pounds of Pollutants Per Year						
	Land Area	Total Phosphorous	Total Nitrogen	BOD	TSS	Zinc	Lead
Commercial	111.7	191.0	1,943.6	12,063.6	109,801.1	137.4	24.6
Forest/Open	49.3	3.9	29.6	443.7	11,585.5	0	0
Heavy Industrial	24.0	34.8	461.8	3,072.0	19,080.0	39.8	5.0
Golf Course	290.0	84.1	440.8	4,350.0	102,950.0	14.5	2.9
Low-Med SF	317.0	342.4	1,496.2	10,778.0	202,563.0	85.6	19.0
Med SF	270.0	364.5	1,595.7	11,610.0	216,270.0	91.8	21.6
Office/Lt Ind	40.9	52.8	700.6	4,662.6	28,957.2	60.5	7.8
T'hse/Apt	212.0	222.6	2,270.5	14,204.0	128,260.0	161.1	29.7
Total	1,314.9	1,296.1	8,938.8	61,183.9	819,466.8	590.8	110.6

Structural Stormwater Pollution Controls

If this project proceeds, Henry County should require that the developer submit a stormwater management plan as a key component of the Plan of Development, or as required by the Henry County Stormwater Management Ordinance. The stormwater plan should include location, construction and design details and all engineering calculations for all stormwater quality control measures. ARC staff recommends that Henry County consider that 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 County 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 or owner's expense. Analysis should conform to EPA standards.

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 County and the responsible party.

In addition to inspections required in the stormwater management plan, the formal maintenance agreement between the developer and the County should allow for periodic inspections for the stormwater facilities to be conducted by the County. 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 County should be given the right to make necessary repairs and bill the responsible party.

HISTORIC RESOURCES

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

No.

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

Not applicable.

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

Not applicable.

INFRASTRUCTURE

Transportation

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

Information submitted with the review projects 58,070 trips per day based on the proposed uses. ARC projects the following from using the Institute of Traffic Engineers Trip Generation (5th Edition) manual. This gross number is not discounted for pass-by trips, internal trips based on the mixed-use character of the development, or ARC required measures to reduce the number of vehicle miles traveled/emissions by 15 percent.

Land Use	Sq.Ft./Units	Weekday	AM Peak Hour		PM Peak Hour	
			Enter	Exit	Enter	Exit
SF Residential	1,048	8,984	161	458	580	312
Office	409,000	3,915	504	416	91	446
Retail	1,011,600	32,380	400	236	1,496	1,496
MF Residential	848	5,512	71	348	535	252
Light Industrial	240,000	1,690	162	33	22	159
52,481						

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
SR 155 West of I-75	2	8,811	.31	2	10,090	.36
U-75 S bet SR 155 & Hampton-LG Rd	6	80,300	.76	8	85,334	.61
US 23/SR 42 East of I-75S, South of SR 155	2	6,267	.18	4	7,574	.11
Hampton/LG Rd East of I-75S	2	2,300	.14	4	5,448	.32
Hampton/LG Rd West of I-75S	2	12,483	.74	4	24,666	.73

The above counts come from 1998 GDOT traffic counts and preliminary 2010 data generated during the ongoing development of a conforming long-range transportation plan. 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.

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)?

I-75S is expected to have both an HOV and general purpose lane added in both directions. Also, US 23/SR 42 and Hampton-Locust Grove Road, both east of the freeway, are scheduled to be widened by 2010. However, there are no projects proposed in the draft Regional Transportation Plan/Transportation Improvement Program to include any roadway improvements to roads west of I-75S at this time.

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.

Not at this time.

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

Discussion of express bus service serving Henry County is underway, but the *Atlanta Region Interim Transportation Improvement Program* currently does not include such program and future initiation of service is unknown at this time.

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

To meet ARC's required 15 percent credit for reduction in vehicle miles traveled/emissions, the development includes at least 10 percent office and 10 percent retail in a predominantly residential development, it includes bike and pedestrian facilities within the development, and the developers are proposing parking management plans.

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?

The traffic analysis suggests that area roads have and will maintain adequate capacity to serve the access and mobility needs of motorized vehicles, though operational improvements may be required.

INFRASTRUCTURE

Wastewater and Sewage

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

Based on regional averages, Eagle Creek could generate 0.82 MGD of wastewater.

Which facility will treat wastewater from the project?

A new 1.5 MGD Luella wastewater treatment plant which will serve Eagle Creek is under construction.

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

1.5 MGD.

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

Unknown.

INFRASTRUCTURE

Water Supply and Treatment

How much water will the proposed project demand?

Increases in water demand are projected to be 0.94 MGD, again based on regional averages.

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 supply for the proposed development but water conserving measures are essential for all new developments.

INFRASTRUCTURE

Solid Waste

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

7,574 tons per year according to U.S. averages. Private pick-up and disposal would be required.

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.

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.)?**

Schools will be heavily impacted by the addition of 1,003 students (regional average). The developers should work with the schools to determine whether the development should include a school site, particularly as the County's Update of the Short-Term Work Program currently under review by ARC includes land acquisition for future schools.

HOUSING

Will the proposed project create a demand for additional housing?

The development includes housing and according to regional averages could house a number of people similar to the number of jobs that could be generated by the development.

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

Yes.

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 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.

HENRY COUNTY BOARD OF EDUCATION

HERBERT W. GARRETT, SUPERINTENDENT

DENNIS WHITE • STOCKBRIDGE • CHAIRMAN
MARY ANN MITCHAM • HAMPTON • VICE CHAIRMAN
RAY HUDALLA • STOCKBRIDGE
PAM NUTT • LOCUST GROVE
CHARLES VICKERY • McDONOUGH

September 20, 1999

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

RE: Local Project ID RZ-99-040

Dear Ms. Rhea,

Mr. Garrett has forwarded to me your notice of a Development of Regional Impact. The purpose of this letter is to respond to this notice.

This proposed development would be served by Locust Grove Elementary, Luella Middle, and Henry County High School. Locust Grove Elementary currently has 787 students and has experienced a 6-8 percent increase in enrollment for each of the last five years. This school is over capacity and currently has 17 portable classrooms. This enrollment of this school may be slightly reduced with the opening of another elementary school next year. The number of portable classrooms is expected to decrease to 15 next year. Luella Middle School is a new middle school scheduled to open next fall. This school will open at capacity. Henry County High School currently has 1872 students and has experienced a 9-12 per cent increase in enrollment for each of the last five years. This school is over capacity and currently has 32 portable classrooms. The enrollment at Henry County High School will be slightly reduced with the opening of an additional high school next year. The number of portable classrooms is expected to decrease to 27 next year.

This DRI reports an projected 1003 students for this development. I feel this projection of .52 students per housing unit (1,048 single-family houses and 848 multi-family residential units) is quite modest.

Please do not hesitate to contact me if you have questions regarding my response.

Sincerely,



Preston Malcom, Ed.D.,
Assistant Superintendent,
Administrative Services

copy: Herbert W. Garrett, Superintendent