

Atlanta Regional Commission
200 Northcreek, Suite 300
3715 Northside Parkway
Atlanta, Georgia 30327-2809
404 364-2500 • Fax 404 364-2599



Harry West
Executive Director
404 364-2525

August 16, 1993

Honorable Emmett Clower, Mayor
City of Snellville
P.O. Box 844
Snellville, GA 30278

RE: Meeting on Snellville Mall - Development of Regional Impact Review
2:00 p.m. Tuesday, August 24, 1993

Dear Emmett:

Recently the Atlanta Regional Commission completed review of the proposed Snellville Mall and other commercial areas as a Development of Regional Impact (DRI). The Commission found this DRI is not in the best interest of the State at this time because it would have 85% impervious surface, represent a potential threat to the Big Haynes Small Water Supply Watershed, and have serious accessibility and traffic limitations. Moreover, approval of the proposed development would be contrary to the Commission's February, 1991, resolution, which is attached.

For information, the proposed development by Homart and NationsBank is 963,000 sq.ft. of retail space, including the proposed regional mall. It is located northwest of the U.S. 78 and Cooper Lake Road intersection.

As you know, ARC currently is coordinating a study of the Big Haynes Water Supply Watershed to determine whether criteria different than the DNR standards for Small Water Supply Watersheds, but providing an equivalent level of protection, can be developed and agreed to by all the local governments within the watershed. ARC's part of the study should be complete early 1994. Until alternative criteria are developed, accepted by the local governments, and approved by DNR, DNR's standards must be adhered to.



Honorable Emmett Clower, Mayor
August 16, 1993
Page 2

The developer of the proposed mall, Homart has requested a meeting to present information on how they would address the water quality and accessibility/traffic issues. Consequently, we have scheduled a meeting for 2:00 p.m. on Tuesday, August 24, 1993, in ARC's Committee Room. We would like to invite you or your representative to attend the meeting.

Enclosed are materials the developer has requested us to distribute with this notice.

Sincerely,


Harry West
Executive Director

HW:br:rlv

c: Mr. Doug Stacks, Planning Director, City of Snellville

Enclosures: ARC Resolutions
Homart Information

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Harry West
Executive Director
404 364-2525

July 29, 1993

Honorable Emmett Clower, Mayor
City of Snellville
P.O. Box 844
Snellville, GA 30278

RE: Development of Regional Impact - Snellville Mall

Dear Emmett:

Enclosed is a copy of a resolution adopted by the Commission on July 28, 1993, finding the Snellville Mall DRI not in the best interest of the State at this time. Further explanation of all the concerns and copies of comments received from affected agencies accompanied my July 14, 1993, letter to you. Comments received from Grayson on July 15 are attached to this letter.

Please feel free to call me if you have any questions regarding this finding or if you want us to arrange any meetings to discuss the comments.

Thank you for the opportunity to review this development proposal.

Sincerely,

A handwritten signature in dark ink, appearing to read "Harry West", is written over the typed name.

Harry West
Executive Director

HW:br:rly

c: Mr. Doug Stacks, City of Snellville
Mr. Griff Doyle, Georgia Department of Community Affairs
Mr. Tony Powell, Attorney
Mr. Wayne Shackelford, GA Department of Transportation
Mr. Joe Tanner, GA Department of Natural Resources
Honorable Wayne Hill, Gwinnett County Commission
Honorable Randy Poynter, Rockdale County Commission
Honorable Michael Jones, City of Loganville
Honorable Stacey Britt, City of Grayson

**ATLANTA REGIONAL COMMISSION CONCERNING THE
REGIONAL IMPACT**

WHEREAS, the Commission
foot shopping

to the Atlanta Regional
proposal to build a 963,500 square

WHEREAS, the Commission
the GA Planning Act of 1960

review of the proposed mall as required by

WHEREAS, the proposed mall is located in the Big Haynes Creek Water Supply
Watershed which is currently being studied by the Commission and local governments for
the purpose of developing a watershed protection plan, and

WHEREAS, on February 27, 1991 the Commission adopted a resolution requesting that
local governments take action which would maintain existing use or characteristics of land
until a watershed protection plan is completed, and

WHEREAS, governmental comments were received from Loganville, Rockdale County,
Gwinnett County and Georgia EPD expressing various concerns about the proposed
Snellville Mall, and

WHEREAS, in its review of the proposal the Commission noted the mall development
would have an impervious surface of 85 percent, represent a potential threat to the Big
Haynes Watershed, and have serious accessibility and traffic limitations;

NOW THEREFORE BE IT RESOLVED, that the Commission finds that the proposed
Snellville Mall is not in the best interest of the State at this time and approval of the
proposal would be contrary to the February 27, 1991 resolution concerning protection of
the Big Haynes Creek Water Supply Watershed since a watershed protection plan is
underway which will allot allowable impervious surface amounts throughout the watershed.

Facility:	<u>Snellville Mall</u>
Preliminary Report:	<u>June 17, 1993</u>
Final Report:	<u>July 14, 1993</u>

DEVELOPMENTS OF REGIONAL IMPACT

REVIEW REPORT

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 area currently within the City limits of Snellville is consistent with the City's comprehensive plan. The area outside the City is currently zoned commercial-retail (11.2 acres) and low density residential (45.1 acres).

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

No. See attached comments from Gwinnett County.

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

Yes. See attached comments from Gwinnett County and Rockdale County.

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 mall and other commercial development will generate 1,300 long-term jobs in the Region according to the information submitted by the City. Transportation improvements at a minimum would be needed to support the development

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

Another regional shopping center was proposed by Homart on 134 acres at the intersection of Georgia Highway 124 and the proposed Ronald Reagan Parkway approximately 2.5 miles from the currently proposed development. The site was rezoned by the City but Homart did not exercise its option. Current plans for the site include a Humana Hospital and medical complex.

GENERAL (continued)

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

Three single-family houses will be displaced by the mall/commercial development.

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 is located northwest of the U.S. 78/Cooper Road intersection.

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.

Part of the proposed development site is within the City limits of Snellville and part is in unincorporated Gwinnett County, but is proposed for annexation by Snellville.

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 land surrounding the proposed development generally is zoned residential.

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 mall development would generate an estimated \$209,280 annual property tax and \$113,000 business license fees at build out according to information submitted by the City.

ECONOMY OF THE REGION (continued)

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

The information submitted for review estimates 1,100 short-term jobs will be created by the proposed development.

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 mall and other commercial development would compete with similar developments in the Region.

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.

The site is located in the Big Haynes Creek water supply watershed and includes some flood plain and a small bit of wetland areas.

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

Watershed Protection Background

Under DNR watershed protection criteria, the 80-square mile Big Haynes Creek water supply watershed is classified as a small watershed. Portions of the proposed development are within a seven-mile radius of Rockdale County's future water supply reservoir. Department of Natural Resources' minimum criteria for small water supply watersheds include the following:

1. The perennial stream corridors of a small water supply watershed within a seven (7) mile radius upstream of a governmentally owned public drinking water supply intake or water supply reservoir are protected by the following criteria:
 - (i) A buffer shall be maintained for a distance of 100 feet on both sides of the stream as measured from the stream banks.

Watershed Protection Background (continued)

- (ii) No impervious surface shall be constructed within a 150 foot setback area on both sides of the stream as measured from the stream banks.
 - (iii) Septic tanks and septic tank drainfields are prohibited in the setback area of (ii) above.
- 2. The perennial stream corridors within a small water supply watershed and outside a seven (7) mile radius upstream of a governmentally owned and public drinking water supply intake or water supply reservoir are protected by the following criteria:
 - (i) A buffer shall be maintained for a distance of 50 feet on both sides of the stream as measured from the stream banks.
 - (ii) No impervious surface shall be constructed with a 75 foot setback area on both sides of the stream as measured from the stream banks.
 - (iii) Septic tanks and septic tanks drainfields are prohibited in the setback areas of (ii) above.
- 3. The following criteria apply at all locations in a small water supply watershed:
 - (i) New sanitary landfills are allowed only if they have synthetic liners and leachate collection systems.
 - (ii) New hazardous waste treatment or disposal facilities are prohibited.
 - (iii) The impervious surface area, including all public and private structures, utilities, or facilities, of the entire water supply watershed shall be limited to twenty-five (25) percent, or existing use, whichever is greater.
 - (iv) New facilities which handle hazardous materials of the types and amounts 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.

The Atlanta Regional Commission (ARC) is currently facilitating a study to investigate variations of the above criteria and develop a proposal for the implementation of the selected protection measures throughout the basin. The study is being directed by Gwinnett, Rockdale, Newton and Walton Counties, the cities of Snellville, Loganville, Grayson and Conyers, the Conyers-Rockdale Impoundment Authority, the Northeast Georgia RDC and the McIntosh Trail RDC. It is anticipated that the study will be completed in approximately nine months.

NATURAL RESOURCES (continued)

The proposed mall will have, based on the Request for review Form, 85 percent of the site in impervious surface. Although DNR criteria do not require 25 percent impervious on every property, allocating too much impervious surface to a single development could have the effect of reducing development potential in the other properties within the City of Snellville and within the other jurisdictions in the basin. This amount of impervious surface will also have the effect of limiting the pollution prevention alternatives available for analysis in the multigovernment watershed protection study.

Projected Pollutant Loadings

Based on some simplifying assumptions for typical pollutant loading factors (pounds per acre per year), ARC staff developed estimates of pollutant loadings for "With Mall" and "Without Mall" scenarios. The pollutant loading factors are those which will be used in the Big Haynes Watershed Protection study and are based on the results of storm water monitoring data from the Atlanta Region. The "With Mall" scenario uses factors associated with typical commercial development having 85 percent imperviousness. The "Without Mall" scenario utilizes factors associated with 1/2 acre lot residential and office/light industrial/light commercial land uses. This scenario assumes the area will be built out as zoned for these uses. The following table summarizes the results of the analysis:

<u>Land Coverage Scenario</u>	<u>Estimated Pounds of Pollutants Per Year</u>				
	<u>Total Phosphorus</u>	<u>Total Nitrogen</u>	<u>BOD</u>	<u>Zinc</u>	<u>Lead</u>
Without Mall					
Res. (45.08 ac)	41.47	182.12	1,307.32	10.37	2.25
L. Comm./Off./L. In. (77.92 ac)	101.30	1,343.34	8,960.80	116.10	14.80
Total	142.77	1,525.46	10,268.12	126.47	17.05
With Mall (123 ac)	214.02	2,168.49	13,530.00	153.75	28.29
Percent Higher With Mall	50%	42%	32%	22%	66%

As shown above, the pounds of pollutants generated if the area is built out as currently zoned ("Without Mall") are significant, and controls will be necessary to ensure that water quality within Big Haynes is not affected adversely. However, the pounds generated by the mall are even greater - 22 to 66 percent higher than pounds generated by residential and light commercial uses as currently zoned.

Recommendations Regarding Storm Water Pollution

Because of its impact on water quality and development potential in the Big Haynes watershed, the City of Snellville should consider several measures to reduce or prevent these adverse impacts.

Option 1: Non-structural Storm Water Pollution Controls. A non-structural alternative would be to require that the developer purchase additional land and/or reduce impervious surface to ensure that the total impervious surface on the combined properties does not exceed 25 percent. For the 104.55 acres of impervious surface the developer proposes for this project, an additional 295 undeveloped acres will be needed to maintain a total percentage impervious of 25 percent. This land need not be directly adjacent to the development site, but could be located in more critical areas of the City's portion of the watershed, such as along Big Haynes Creek and its tributaries, for example. This action would help preserve development potential and an increased number of available pollution prevention options to examine in the watershed study. In addition, the DNR buffer and impervious surface setback requirements should be observed.

Option 2: Structural Storm Water Pollution Controls. Structural controls are not as desirable as non-structural controls but are an option when non-structural controls are not possible. If the developer selects storm water management options which involve structural controls, it is important for the City of Snellville to require that the developer submit a storm water management plan as a key component of the Plan of Development. The storm water plan should include the location, construction and 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 maintained with a 90 percent pollutant removal efficiency.

The Plan should include a monitoring program to ensure storm water pollution control facilities function properly. ARC staff recommends that structural controls be designed to accommodate the installation, operation and maintenance of automatic equipment to monitor the inflow, discharge and flow at intermediate points for flow rates and water quality. It is recommended that the monitoring program consist of the following minimum information:

- four storms per year (one per quarter);
- collect flow weighted composite samples during the entire storm event of the inflow to the structure;
- collect a flow weighted composite of the outflow from the structure - the sampling period should include the peak outflow resulting from the storm event;
- samples should be analyzed for biochemical oxygen demand (BOD), total suspended solids (TSS), zinc, lead, total phosphorus and total nitrogen (TKN and NO₃); and,
- grab samples should be collected near the point of peak inflow and outflow for pH, dissolved oxygen (D.O.) and fecal coliform bacteria.

The City's Engineering Department 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. Specific monitoring procedures and parameters analyzed may change in the future based on continuing storm water runoff and water quality studies.

NATURAL RESOURCES

Recommendations Regarding Storm Water Pollution (continued)

The Storm Water Plan should require the developer to submit a detailed, long-term schedule for inspection and maintenance of the storm water 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 Snellville 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.

No.

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?

N/A

INFRASTRUCTURE

Transportation

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

	<u>AM Peak</u>		<u>PM Peak</u>	
	<u>Enter</u>	<u>Exit</u>	<u>Enter</u>	<u>Exit</u>
Total Weekday Traffic = 31,199	389	228	1,444	1,444
Total Saturday Traffic = 37,938		<u>Peak Hour</u>		
		3,751		

INFRASTRUCTURE
Transportation (continued)

The above trip generation figures were calculated using the Institute of Transportation Engineers Trip Generation (5th Edition) manual.

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

The following volumes are based on 1992 GDOT coverage counts from area facilities:

<u>Road</u>	<u># of Lanes</u>	<u>GDOT 1992 Count</u>	<u>V/C Ratio</u>
U.S. 78			
SR 84 to Rosebud Road	4	20,990	0.84
Rosebud Road to County Line	4	15,870	0.63
U.S. 84			
U.S. 78 to SR 20	2	3,445	0.50

Future traffic forecasts for area facilities were obtained from the ARC transportation model and are as follows:

<u>Road</u>	<u># of Lanes</u>	<u>2010 Daily Volume</u>	<u>V/C Ratio</u>
U.S. 78			
SR 84 to Rosebud Road	4	19,400	0.78
Rosebud Road to Outer Loop	4	31,200	1.25
U.S. 84			
U.S. 78 to Snellville E/W Connector	2	6,260	.09
Snellville East/West Connector			
U.S. 78 to SR 84	4	16,265	0.53
Outer Loop			
North of U.S. 78	4	48,600	0.99
South of U.S. 79	4	39,000	0.80

INFRASTRUCTURE

Transportation (continued)

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)?

Long-Range projects

GW27 - Construct the Snellville East/West Connector, a four-lane facility, from Highpoint Road to U.S. 78.

State-Funded projects

R54 - Construct Outer Loop, a four-lane facility, from Alcovy Road to U.S. 78.

R58 - Construct Outer Loop, a four-lane facility, from U.S. 78 to I-20.

Construction for both projects is scheduled for the long-range element. (FY 2000-2010.)

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?

Not at this time.

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

None.

INFRASTRUCTURE

Transportation (continued)

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

1. **South Gwinnett Mall:** A proposal to construct an 860,000 square-foot regional shopping center. ARC staff estimated that the project would generate 29,000 additional daily vehicle trips, 3,100 p.m. peak-hour weekday trips, 36,800 Saturday trips, and 3,400 Saturday peak-period trips. There are currently no plans to construct the project.

As stated before, the Snellville Mall will generate about 32,000 weekday trips, 2,900 p.m. peak-hour weekday trips, 37,900 Saturday trips and 3,750 Saturday peak-hour trips.

The 2010 forecast volumes show that, even without the South Gwinnett Mall or the proposed Snellville Mall, most of the roads in the project area are expected to be congested during peak-hour travel periods. U.S. 78 is projected to be highly congested east of the project, from Rosebud Road to the Outer Loop. There are currently no plans to widen this section of U.S. 78 beyond four lanes.

Currently, there are not any plans or strategies by the developer to mitigate the impact of the project on the local transportation system. The City of Snellville and Gwinnett County should work with the developers to implement some traffic-reduction strategies. These may include:

1. Locating buildings, driveways, and parking areas to facilitate pedestrian trips.
2. Initiating and funding carpooling and vanpooling programs and equipment.
3. Identifying and participating in the cost of off-site street improvements to ease traffic congestion.
4. Using private sector resources to subsidize transit service to employees.

Wastewater and Sewage

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

According to information submitted with the review, the proposed development could generate 0.25 MGD wastewater.

Which facility will treat wastewater from the project?

The site is located in the Big Haynes Creek sewer service area.

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

Big Haynes Wastewater Treatment Plant has a final permitted capacity of 0.5 MGD with a 1990 average flow of 0.341 MGD. The Big Haynes Plant currently is off line and sewage is being pumped via an existing interceptor from this basin to the Pole Bridge Wastewater Treatment Plant on the South River in DeKalb County.

This plant has 5 MGD treatment capacity reserved for Gwinnett County. Total capacity is 20.0 MGD and recent average flow was 5.08 MGD.

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

None at Big Haynes.

Atlanta Polo Club at Pole Bridge Creek. (Reviewed 1984 - 1,600 housing units - much of development completed.)

Water Supply and Treatment

How much water will the proposed project demand?

According to information submitted with the review, the proposed development could have a demand for 0.25 MGD water.

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

Water for the City of Snellville is provided by Gwinnett County.

Solid Waste

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

The City of Snellville has a contract with a private garbage collection service which disposes of waste in Barrow County.

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.

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.)?

No.

HOUSING

Will the proposed project create a demand for additional housing?

The project may create some demand for additional housing.

HOUSING (continued)

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 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 - 1990 median family income if \$41,500 for Atlanta MSA.**

**A RESOLUTION BY THE ATLANTA REGIONAL COMMISSION
REQUESTING LOCAL GOVERNMENTS TO TAKE ACTION
TO PROTECT THE BIG HAYNES CREEK
WATER SUPPLY WATERSHED**

WHEREAS, in accordance with the provisions of Chapter 110-3-2.03(5) of the Georgia Department of Community Affairs, Minimum Planning Standards and Procedures, implementing Georgia Laws 1989, pp. 1317-1391, Act 634, the Atlanta Regional Commission has the responsibility to promote coordinated and comprehensive planning by local governments within the Region, in conformity with the minimum planning standards and procedures established pursuant to Act 634; and

WHEREAS, among these standards are the Criteria for Water Supply Watersheds, Chapter 391-3-16-.01, Rules for Environmental Planning Criteria of the Rules of the Georgia Department of Natural Resources, Environmental Protection Division; and

WHEREAS, these standards provide criteria for the protection of public water supply watersheds including criteria for the protection of existing and proposed water supply watersheds with areas of less than 100 square miles, defined as "small" water supply watersheds; and

WHEREAS, these criteria for small water supply watersheds include undisturbed buffers and impervious surface set backs on all flowing streams, and a maximum impervious surface area of 25 percent or the existing use, if greater, throughout the watershed; and

WHEREAS, the Big Haynes Creek water supply watershed has about 80 square miles upstream of the proposed river intake above the Yellow River and about 49 square miles upstream of the proposed reservoir above Highway 138; and

WHEREAS, the small watershed criteria apply to the Big Haynes water supply watershed; and

WHEREAS, continued rezoning of land for large developments in the Big Haynes Creek water supply watershed jurisdictions can result in the unfair allotment of all the allowable impervious surface amounts in a jurisdiction before the mandated plans are passed; and

WHEREAS, this may preclude future development in a jurisdiction or take impervious surface allotments from another jurisdiction; and

WHEREAS, the water quality of Big Haynes Creek will be degraded; and

WHEREAS, water supply watershed protection is important to the public health and welfare of the Atlanta Region; and

WHEREAS, achievement of the goals of Georgia Laws, Act 634 depends upon the cooperation of all local governments having jurisdiction over land within the watershed;

NOW, THEREFORE BE IT RESOLVED that the Atlanta Regional Commission encourages all local governments within the Big Haynes water supply watershed to allow only rezonings and permits that would result in development which does not exceed the 25 percent impervious surface as required for small water supply watersheds in Chapter 391-3-16-.01, Rules for Environmental Planning Criteria of the Rules of the Georgia Department of Natural Resources, Environmental Protection Division and to take such other action as may be appropriate which will have the effect of maintaining the use or characteristics of land within the watershed until such time as a watershed protection plan is developed and worked out among all governments in the watershed.

Georgia Department of Natural Resources

205 Butler Street, S.E., East Floyd Tower, Atlanta, Georgia 30334

Joe D. Tanner, Commissioner
Harold F. Reheis, Director
Environmental Protection Division

June 25, 1993

RECEIVED

JUN 30 1993

ARC

Mr. Harry West, Executive Director
Atlanta Regional Commission
200 Northcreek, Suite 300
3715 Northside Parkway
Atlanta, Georgia 30327-2809

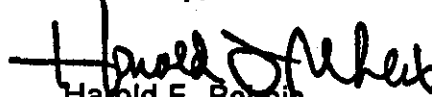
RE: Development of Snellville Mall

Dear Harry:

The DRI preliminary report submitted to your office by the City of Snellville indicates an understanding and appreciation of the Environmental Protection Division's desire to have political jurisdictions fully consider the water supply watershed protection implications of such projects during the planning and design phases. We applaud ARC's efforts to go forth with the current Big Haynes Creek water supply watershed protection study, and we understand that projects such as the proposed Snellville Mall will be properly addressed in the study's development of alternatives for meeting DNR's minimum planning criteria for water supply watershed protection. Rather than commenting on individual projects such as the mall, EPD prefers to refrain until the study has produced comprehensive alternatives.

Thank you for this opportunity to respond.

Sincerely,



Harold F. Reheis

Director

Environmental Protection Division

cc: Clay Burdette



Post-It™ brand fax transmittal memo 7671		# of pages	2	
To	Beverly Rhea		From	Gary Cornell
Co.	ARC		Co.	Gwin. County
Dept.			Phone #	822-7621
Fax #	364-2599		Fax #	822-7513

July 1, 1993

Beverly Rhea, Project Review Coordinator
Atlanta Regional Commission
3715 Northside Parkway
200 Northcreek, Suite 300
Atlanta, GA 30327

SUBJECT: DRI for Snellville Mall

Dear Ms. Rhea:

The Planning staff offers the following comments for consideration:

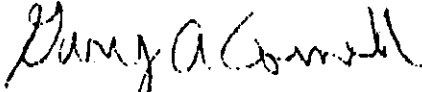
1. The use of outparcels is unclear. If they are not included in the water and traffic generation, then these impacts are underestimated.
2. Gwinnett County knows of no road improvement plans for surrounding thoroughfares likely to be impacted (Cooper Road, U.S. 78, and Rosebud Road). Without commitments for such improvements, traffic congestion in this area would be severe.
3. The proposed development plan would not provide any land use transition for residential properties to the rear. The 100 foot buffer may not be adequate separation for the existing subdivision to the north.
4. The proposed retail center is adjacent to a tributary of the Big Haynes Creek which may require a 100 foot undisturbed buffer.
5. The increased scale of this development causes staff considerable concern as it may affect the Gwinnett County Land Use Plan. A casual look at the Gwinnett Place Mall area reveals an abundance of associated retail and office uses ringing the mall. The mall itself is only a small fraction (10-20%) of the total envelope of commercial uses in a 1/2 mile radius.

From a "big picture" perspective, I do not know of a mall this size in the Atlanta area which is located apart from a freeway. This makes me concerned about whether the proposed mall could compete successfully in this market. I feel strongly that this location is premature and not suitable for addressing the overall impact of a regional node of such magnitude unless definite commitments are available concerning the construction timetable for the Outer Loop. Even so, this particular site is a mile from the proposed location of the Outer Loop. In view of the Big Haynes issue and the

Page 2

uncertainty of the location and timing of the proposed Outer Loop we would be more comfortable with a smaller center here at a scale which is more appropriate for serving the needs of the immediate community.

Sincerely



Gary A. Cornell, AICP

cc: Pat Chapman
File C05.1.4.3 Snellville Mall
CORR 93.7

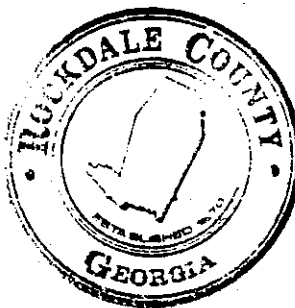
RECEIVED

Dick

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(404) 929-4001
Fax (404) 483-4376



Board of Commissioners

Randolph W. Poynter, Chairman
Bud Sosebee
Norman Wheeler

July 1, 1993

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

Dear Harry,

Pursuant to your letter of June 18, 1993 regarding development of regional impact review - Snellville Mall, attached are comments from the Big Haynes Impoundment Authority and myself.

Thank you for sending a copy of the City of Snellville's request and I appreciate having the opportunity to respond.

Please give me a call if I can help in any other way.

Sincerely yours,

Randolph W. Poynter
Chairman

RWP:bdm
Encl:

7-1-75
CONYERS ROCKDALE BIG HAYNES IMPOUNDMENT AUTHORITY

I appreciate the opportunity to comment on the proposed annexation and rezoning request of Homart Development and Nations Bank addressed to the City of Snellville. The land involved is the site of a proposed 123-acre shopping mall.

Several features of the project are of concern. The details of buffers from the Big Haynes Creek tributary draining the mall, the method of water treatment from the 101-acre impervious surface runoff, the method of managing runoff from the associated additional highway system needed to support the 37,938 (Saturday) vehicle 24-hour traffic volume, and erosion and sediment control by the developer are inadequately addressed in this annexation and zoning proposal. Although these concerns will probably be explained further in the Environmental Impact Statement, some might well be expressed now.

Fifty or 100-foot buffers are too narrow to be effective following a 2 inch rain in which approximately 17 acre-feet of runoff (plus that resulting from increased highway surface) can be produced in much less than an hour. The breakdown time for complex organic compounds produced by automobiles varies from months to years. In order to prevent these products from reaching the reservoir on Big Haynes Creek (about 2 hours flow time downstream from Snellville) where they would accumulate and ferment, it will be necessary to store runoff for several months. An alternative would be to use the 295-acre tract mentioned in the proposal for land use. Erecting a two story mall instead of a single story

decreases the impervious surface but does not address the problem of automobile contaminants - it merely concentrates them.

Several of the responses to infrastructure are superficial glossovers. It is difficult to understand how 1,100 jobs (people) can accumulate and not result in the need for increased schools, police protection, more roads, etc. Whether or not the jobs could be filled from the regional work force, the availability of the jobs will bring in outside people who must be taken care of by some local government unless they are to sleep under bridges and allowed to starve.

The proposal, in summary, seems superficial and does not adequately address many of the long term issues.

To Dawn
from
Fred Parrish
7/1/93

C. Jean

DEVELOPMENTS OF REGIONAL IMPACT

Comments from Affected Parties Form

Project I.D.: SNELLVILLE MALL
(From Request for Comments Form)

Name of Commenting Organization: ROCKDALE COUNTY

Address: 922 Court St.
Conyers, Ga 30207

Contact Person: Randolph W. Poynter, Chairman Telephone Number: 404-929-4055

Do you believe your jurisdiction will be affected by the proposed development? ☒ Yes ☐ No

Please describe the effects (positive and/or negative) the proposed project could have on your jurisdiction:
Rockdale County is the recipient of stormwater runoff in the watershed affected by the projects as the water is to be used for future water supply in conjunction with the proposed Big Haynes Reservoir. In reading the comments submitted, the following questions are of great concern to Rockdale County and the City of Conyers:

1. Page 2 - The City of Snellville has indicated the water runoff will be treated.

- What method of treatment will be used?
- What pollutants are targeted for treatment?
- How will this fit into proposals expected from the ARC Water Quality Study being conducted by CDM?

2. Pages 2 & 5 - The impervious surface proposed (85%) far exceeds the 25% cap in the DNR Regulations.

- How is the proration of impervious surfaces to be handled with other developments in the watershed?
- A multi-story mall would not be feasible, but parking decks might be feasible if costs are controlled.
- Rockdale County is self-imposing a 6% impervious surface, however, it would not be equitable for this one project to utilize all the pro-rated credit of impervious surface limits.

(Attach Additional Pages if Necessary)

Form Completed By: Randolph W. Poynter

Title: Chairman

Signature: *Randy Poynter*

Date: 7-1-93

RETURN TO: ATLANTA REGIONAL COMMISSION
3715 Northside Parkway
200 Northcreek, Suite 300
Atlanta, Ga. 30327

ATTENTION: REVIEW OFFICE

FAX NO. 404-364-2599

DCA/OCP 10/7/91

DEVELOPMENTS OF REGIONAL IMPACT

Comments from Affected Parties Form

Project ID: _____
(From Request for Comments Form)

Name of Commenting Organization: CITY OF GRAYSON

Address: MAIN ST. GRAYSON, GA. 30221

Contact Person: Stacey Britt Telephone Number: 972-4200

Do you believe your jurisdiction will be affected by the proposed development? ☒ Yes ☐ No

Please describe the effects (positive and/or negative) the proposed project could have on your jurisdiction:

I think all impacts would be very positive
to Grayson and the surrounding areas. The
impact to the local school boards and city,
city county, these houses would be beneficial
we need more projects like this to relieve
some of the burdens on the individual
home owners

(Attach Additional Pages if Necessary)

Form Completed By: Stacey Britt Title: MAYOR

Signature: Stacey Britt Date: _____

RETURN TO: ATLANTA REGIONAL COMMISSION
3715 Northside Parkway
200 Northcreek, Suite 300
Atlanta, Ga. 30327
ATTENTION: REVIEW OFFICE

FAX NO. 404-364-2599

DCA/OCP 10/7/9

DEVELOPMENTS OF REGIONAL IMPACT

Comments from Affected Parties Form

Project LD: Regional Shopping
(From Request for Comments Form) CR
Spiller, LB

Name of Commenting Organization: City of Los Angeles

Address: PO Box 39
Los Angeles, CA 90049

Contact Person: Lee Gorman Telephone Number: 404-466-1165

Do you believe your jurisdiction will be affected by the proposed development? Yes ☒ No

Please describe the effects (positive and/or negative) the proposed project could have on your jurisdiction:

We might get a little more traffic but
nothing else.

(Attach Additional Pages if Necessary)

Form Completed By: Lee Gorman

Title: City Mgr

Signature: [Signature]

Date: 6-25-93

RETURN TO: ATLANTA REGIONAL COMMISSION
3715 Northside Parkway
200 Northcreek, Suite 300
Atlanta, Ga. 30327
ATTENTION: REVIEW OFFICE

FAX NO. 404-364-2599

DCA/OCF 10

BACKGROUND INFORMATION ON SNELLVILLE MALL

In late February, 1991, the Atlanta Regional Commission (ARC) received a Major Development Area Plan Review for a proposed regional shopping center, office and commercial development on 77 acres at the Northwest corner of U.S. 78 and Cooper Road. The mall site was in the City of Snellville and the office and other commercial development site was in unincorporated Gwinnett County adjacent to the mall site.

The review was submitted by the City of Snellville for the City and for Gwinnett County. The development was proposed by National Industrial Development Corporation (De Bartolo).

At the time ARC completed the review, the City/County were requested to submit the development plan for further review when NIDC (or others) requested further action on the project. No further plans were received by ARC.

The City of Snellville has now submitted a Development of Regional Impact (DRI) Review on a 123-acre site that includes the previous NIDC site plus additional land. The City has been asked by Homart Development Company and NationsBank to annex the 56.24 acres of the site not currently within the city limits and to rezone the annexed property to general business, allowing expansion of the previous mall site and constructing an additional retail development on the northwest part of the site.