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

Harry West
Director

March 24, 1999

Honorable Mike Kenn, Chairman
Fulton County Commission
141 Pryor Street, SW--10th Floor
Atlanta, GA. 30303

RE: Development of Regional Impact
MERITEX, Inc.

Dear Mike:

I am writing to let you know that the ARC staff has completed the Development of Regional Impact (DRI) Review of the expansion of the MERITEX industrial park. Our finding is that this DRI is in the best interest of the State. We appreciate the developer working with us and agreeing to install bike and pedestrian facilities within this development and allowing future connection to adjoining sites.

I might mention also that while this property is located in the Chattahoochee River Corridor as extended by the 1998 amendments to the Metropolitan River Protection Act, the expansion will qualify for "grandfathering" under the Act if it is under construction by July 1, 1999.

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

Sincerely,

Harry West
Director

Enclosure

c Mr. Mike Charlson, Fulton County Environment & Community Dev.
Mr. Dan Ward, MERITEX, Inc.
Ms. Rose Leypoldt, Eberly & Associates
Mr. Wayne Shackelford, GDOT
Mr. Rick Brooks, GDCA
Mr. Harold Reheis, GEPD

Facility: Expansion of Meritex, Inc. Industrial Park
Preliminary Report: February 10, 1999
Final Report: March 22, 1999

DEVELOPMENTS OF REGIONAL IMPACT

REVIEW REPORT

PROPOSED DEVELOPMENT: Add 555,250 sq.ft. of industrial space and 18,600 sq.ft. of commercial space to the 87.6 acre site which currently contains 420,000 sq.ft. of industrial space

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.

According to information submitted with the review, the proposed development is consistent with the Fulton County Comprehensive Plan and the site has been zoned for some period of time for the proposed use. The development currently is applying for a land disturbance permit.

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

No inconsistencies with comprehensive plans were identified by the notified local governments; however, Douglas County noted that they will be impacted by traffic volumes which are expected to increase on Riverside Parkway, Camp Creek Parkway, and connecting streets.

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

No on Fulton County according to information submitted with the review.

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

According to information submitted, the development is expected to accommodate 250 jobs. The development is projected to be warehousing which is a low generator of employment.

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

New Manchester is a mixed use community that has been proposed across the Chattahoochee River from this site. New Manchester includes various uses with wide setbacks from the River.

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 site is located on Fulton Industrial Boulevard south of Camp Creek Parkway. The property runs to the Chattahoochee River but development is separated from the River frontage by a railroad line and spur. 84°35'/33°44'.

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 directly across the Chattahoochee River from Douglas County and the City of Douglasville where New Manchester is proposed.

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.

Since MERITEX plans no development between the railroad line/spur and the River and since the development will consist of low-rise warehousing structures and since New Manchester includes wide setbacks from the River, it is unlikely that MERITEX will be very visible from New Manchester. Both developments will increase traffic on Camp Creek Parkway.

ECONOMY OF THE REGION

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

What new taxes will be generated by the proposed project?

Information submitted with the review estimates $300,000 based on $30 million 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 with the first building planned for completion by July, 2000.

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

Yes.

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

The development will compete with other warehousing space in the vicinity.

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?

Chattahoochee River Corridor

The proposed development is located within the Chattahoochee River Corridor. The applicants have submitted evidence that the property was zoned prior to July, 1998, and that at least $5,000 was spent in preparation for construction in accordance with the zoning. Therefore the project is not subject to review under the Metropolitan River Protection Act for consistency with the standards of the Chattahoochee Corridor Plan per Georgia Code 12-5-451 (5)(A)(ii). This exemption will be finalized when the applicant shows evidence that, excluding the cost of the land, at least 10 percent of the total project cost, or $100,000, whichever is less, has been spent and development has begun by July 1, 1999.

Also, because a railroad line separates the bulk of the property from the River, no development is indicated for most floodplain areas or within 400 to 500 feet of the River. However, for the remaining parts of the property, ARC staff recommends that the project be developed in a manner that will still provide protection to the River, its tributaries and surrounding lands. Specific recommendations include: maintaining a minimum 35-foot undisturbed natural vegetation buffer on tributary streams, minimizing development in any River or tributary floodplains and, where floodplain development is necessary, balancing all fill with an equal volume of cut.

Floodplains

Portions of the proposed project site are located within the 100-year floodplain. If development or fill is proposed in the floodplain, steps should be taken by Fulton County to mitigate potential impacts on these floodplains. The Atlanta Regional Commission's *Regional Development Plan* notes that "all structures that can be damaged or land uses that can impede flood waters or reduce storage volume must be built outside the intermediate region (one percent) flood limits (i.e., outside the 100-year flood limit), with the exception that a stream crossing may vary from this policy if constructed so as to permit passage of a 100-year flood with minimum feasible flow impedance, storage volume reduction, and upstream or downstream erosion or deposition." This policy is in addition to requirements under the Metropolitan River Protection Act.

Storm Water/Water Quality

Steps must be taken to limit the amount of pollutants that will be produced during and after construction. During construction, the project should conform to the County's erosion and sediment control requirements. After construction, water quality can be impacted without storm water pollution controls. ARC staff estimated the amount of pollutants that will be produced after construction of the expansion to the Industrial Park. These estimates are based on some simplifying assumptions for typical pollutant loading factors (pounds/acre/year). The loading factors are based on the results of regional storm water monitoring data from the Atlanta Region. The following table summarizes the results of the analysis.

Estimated Pounds of Pollutants Per Year

Land Coverage	Total Phosphorous	Total Nitrogen	BOD	TSS	Zinc	Lead
Commercial (14.6ac)	24.97	254.04	1576.80	14351.80	17.96	3.21
Office/Light Industrial (73.0ac)	94.17	1250.49	8322.00	51684.00	108.04	13.87
Total	**119.14**	**1504.53**	**9898.80**	**66035.80**	**126.00**	**17.08**

If the County approves the development, steps to mitigate these potential impacts should be taken.

Structural Storm Water Pollution Controls

Areas within the development are located adjacent to the Chattahoochee river; therefore it is essential that steps be taken to control both the quantity and quality of storm water runoff.

Fulton County should 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 location, construction design details, and all

engineering calculations for all storm water quality control measures. ARC staff recommends that the 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 storm water pollution control facilities function properly. Staff recommends that structural controls be designed to accommodate 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 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 County's Engineering Department should determine the actual number and size of storms to be monitored as well as who should be responsible for conducting the monitoring. Monitoring should be conducted at the developers' and owners' 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.

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 County and the responsible party.

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

The County 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 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?

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?

ARC staff estimates 4,400 weekday trips with 75 entering and 190 exiting during am peak hour and 243 entering and 170 exiting during pm peak hour. These estimates were prepared using the Institute of Traffic Engineers Trip Generation (5th Edition) manual. The estimates do not reflect pass-by trip reduction, possible additional internal trip capture associated with the services provided in the industrial park, or reductions due to use of alternative modes provided (rail, bus, bike, pedestrian).

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 1997 GDOT coverage counts and projected 2010 volumes from ARC's Travel Demand Model from area facilities—Fulton Industrial Boulevard (FIB) and Camp Creek Parkway (CCP)--that will likely provide the primary routes for traveling to the proposed development.

		1997			2010	
Facility	Lanes	Volume	V/C Ratio	Lanes	Volume	V/C Ratio
FIB west of CCP	4	21,845	.34	4	31,098	.48
FIB east of CCP	4	29,367	.45	4	55,324	.85
CCP north of FIB	4	22,875	.35	4	62,275	.96
CCP south of FIB	4	16,151	.25	4	53,461	.82

Based on current data, the traffic analysis suggests that area freeways and surface streets have and will maintain adequate capacity to serve the access and mobility needs of motorized vehicle traffic. However, area congestion could become an issue beyond 2010.

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)?

There is a scheduled extension of MARTA's west line down the Fulton Industrial Boulevard corridor. Based on ARC's Scenario 3/3A network, I-20 is scheduled to have additional capacity at the Fulton Industrial Boulevard exit. Otherwise, no other projects are expected.

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?

Currently no. However, as stated above, MARTA is expected to extend its current West Line into the Fulton Industrial corridor.

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

MARTA Bus Route 73 serves the Fulton Industrial Boulevard area with service both weekdays and weekends and connecting with the Hightower station.

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

MARTA is studying bus service changes at this time. Also, it is expected with additional MARTA rail line, bus routes in or around the area would increase.

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

To achieve 15 percent reduction in vehicle miles traveled/emissions, the development plan includes an existing rail spur and an additional proposed spur (10% credit), MARTA bus service to the site (3% credit), and bike/pedestrian network within the development and along frontage on Fulton Industrial Boulevard (4% credit).

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?

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?

Information submitted with the review indicates 0.0219 MGD.

Which facility will treat wastewater from the project?

The site appears to be located in the Camp Creek Wastewater Treatment Plant sewer service area.

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

Camp Creek Treatment Plant has a current permitted capacity of 13.0 MGD with 12.2 MGD reported average use.

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

ARC has reviewed several major developments which would add flow to this plant beyond its capacity if all were built as proposed which is unlikely. In addition the County has purchased property to improve and expand the Plant.

INFRASTRUCTURE
Water Supply and Treatment

How much water will the proposed project demand?

Again information submitted with the review indicates 0.0219 MGD.

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

The County should have sufficient water supply but water conserving measures are essential in all new developments.

INFRASTRUCTURE
Solid Waste

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

National averages would suggest that 975,250 sq.ft. of warehousing could generate 4.8 tons of solid waste per day, or 1,779.8 tons per year. The industrial park will contract for collection/disposal of waste.

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

Unlikely since the development is anticipated to be warehousing for groceries and like items. However, this will not be known for certain until occupants of buildings are known.

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.)?**

No.

HOUSING

Will the proposed project create a demand for additional housing?

Very little demand as warehousing does not generate many jobs.

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, especially with MARTA service being available.

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.

DEVELOPMENT OF REGIONAL IMPACT

DRI–REQUEST FOR COMMENTS

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

Preliminary findings and comments of the RDC:

MERITEX, Inc. -

See Preliminary Report

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

Douglas County will be most impacted by traffic volumes with respect to the Meritex development. Traffic volumes can be expected to increase on Riverside Parkway, Camp Creek Parkway (SR 6) and connecting Streets.

Individual completing form: Wesley C Dalton

Local Government: Douglas County

Department: Engineering

Telephone: (770) 920-7243

Signature: Wesley C Dalton Date: 2/23/99

Please return this form to:
Mrs. Beverly Rhea
Atlanta Regional Commission
3715 Northside Pkwy
200 Northcreek, Suite 300
Atlanta GA 30327

Return Deadline: February 24, 1999

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

MEMORANDUM

TO: Beverly Rhea

FROM: Susie Dunn

DATE: March 23, 1999

SUBJECT: **DRI - TRANSPORTATION INFRASTRUCTURE REVIEW**
No. R902111
Project: Meritex, Inc.
County: Fulton County
Location: NW corner of Fulton Industrial Blvd/SR 70 (FIB) and Camp Creek Parkway/SR 6 (CCP)

cc: Chris Chovan, Reviewer
TPD File

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

			AM Peak Hour		PM Peak Hour	
Land Use	**Sq. Feet or units**	**Weekday**	**Enter**	**Exit**	**Enter**	**Exit**
Warehouse	555,250 sq. ft.	2,796	37	167	159	86
Office	19,000 sq. ft.	1,604	38	23	84	84
Total		**4,400**	**75**	**190**	**243**	**170**

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

2. 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 1997 GDOT coverage counts and projected 2010 volumes from ARC's Travel Demand model from area facilities that will likely provide the primary routes for traveling to the proposed development.

	1997			2010		
Facility	Lanes	Volume	V/C ratio	Lanes	Volume	V/C ratio
FIB (SR 70) west of CCP	4	21,845	.34	4	31,098	.48
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CCP (SR 6) south of FIB	4	16,151	.25	4	53,461	.82

Based on current data, the traffic analysis suggests that area surface streets have and will maintain adequate capacity to serve the access and mobility needs of motorized vehicle traffic. However, area congestion could become an issue beyond 2010.

3. **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)?**

There is a scheduled extension of MARTA's west line down the Fulton Industrial Boulevard corridor. Based on ARC's Scenario 3/3A network, I-20 is scheduled to have additional capacity at the Fulton Industrial Boulevard exit. Otherwise, no other projects are expected.

4. **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?**

Currently, no. However, as stated above, MARTA is expected to extend its current West Line into the Fulton Industrial corridor.

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

Yes. MARTA Route 73 serves the Fulton Industrial corridor and the Hightower heavy rail station, but does not continue this far south on FIB.

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

It is expected with the additional MARTA rail line, bus routes in or around the area would increase.

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

None.

8. **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 area roads have and will maintain adequate capacity to serve the access and mobility needs of motorized vehicles, though operational improvements may be required. To ensure that the access and mobility needs of non-motorized modes of transportation are met the developer should install:

- priority parking for those utilizing carpools or vanpools;
- provision of on-site infrastructure for the refueling of alternatively-fueled vehicles.

Data sources:

- Institute of Traffic Engineers Trip Generation (5th Edition) manual
- 1997 GDOT Coverage Counts
- ARC Travel Demand Model Results (Scenario 3/3A, September 1998) – from the on-going development of RTP:2025
- MARTA website, itsmarta.com

Meritex, Inc. Development
Environmental Planning Division Review Comments

Chattahoochee River Corridor

The project proposal submitted for this DRI is within the Chattahoochee River Corridor. The applicants have submitted evidence that at least $5,000 was spent in preparation for construction in accordance with the current zoning as of July 1, 1998. Therefore, this project is not be subject to review under the Metropolitan River Protection Act for consistency with the standards of the Chattahoochee Corridor Plan as per Georgia Code 12-5-451(5)(A)(ii). This exemption will be finalized when the applicants show evidence that, excluding the cost of the land, at least 10 percent of the total project cost, or at least $100,000, whichever is less, has been spent before July 1, 1999.

Because a railroad line separates the bulk of the property from the river, no development is indicated for most floodplain areas or for within 400-500 feet of the river. However, for the remaining parts of the property, we recommend that the project be developed in a manner that will still provide protection to the river, its tributaries and surrounding lands. Our specific recommendations include: maintaining a 35-foot undisturbed natural vegetative buffer on tributary streams, minimizing development in any river or tributary floodplains and, where floodplain development is necessary, balancing all fill with an equal volume of cut.

Floodplains

The development included land that is located within areas of the 100-year floodplain. If development or fill is proposed in the floodplain, steps should be taken by the Fulton County to mitigate potential impacts on these floodplains. The Atlanta Regional Commission's Regional Development Plan notes that "all structures that can be damaged or land uses that can impede flood waters or reduce storage volume must be built outside the intermediate region (one percent) flood limits (i.e., outside the 100-year flood limit), with the exception that a stream crossing may vary from this policy, if constructed so as to permit passage of a 100-year flood with minimum feasible flow impedance, storage volume reduction, and upstream or downstream erosion or deposition." These actions are in addition to requirements under the Metropolitan River Protection Act.

Storm Water / Water Quality

Steps should be taken to limit the amount of pollutants that will be produced during and after construction. During construction, the project should conform to the County's erosion and sediment control requirements. After construction, water quality can be impacted without storm water pollution controls. ARC estimated the amount of 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 storm water monitoring data from the Atlanta Region. The following table summarizes the results of the analysis.

Estimated Pounds of Pollutants Per Year

Land Coverage	Total Phosphorus	Total Nitrogen	BOD	TSS	Zinc	Lead
Commercial (14.6 ac)	24.97	254.04	1576.80	14351.80	17.96	3.21
Office/Industrial (73.0 ac)	73.00	94.17	1250.49	8322.00	51684.00	13.87
Total (87.6 ac)	119.14	1504.53	9898.80	66035.80	126.00	17.08

If the development is approved, Fulton County should take steps to mitigate potential impacts.

Structural Storm Water Pollution Controls

Areas within the development are located adjacent to the Chattahoochee River therefore it is essential that steps be taken to control both the quantity and quality of stormwater runoff.

Fulton County should 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 location, construction and design details and all engineering calculations for all storm water quality control measures. Atlanta Regional Commission staff recommends that the County consider that structural controls be maintained at an 80% - 90% total suspended solids removal efficiency.

The Plan should also include a monitoring program to ensure storm water pollution control facilities function properly. Atlanta Regional Commission 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 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 & NO_3); and,
- collection of grab samples at the inlet and outlet locations during the periods of peak inflow and outflow for pH, dissolved oxygen (D.O.) and fecal coliform bacteria.

The County's Engineering Department should determine the actual number and size of storms to be monitored as well as who should be responsible for conducting the monitoring. Monitoring should be conducted at the developer's 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.

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 County and the responsible party.

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

The County 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.