BeV

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

Harry West
Director

January 31, 1997

Honorable Mitch Skandalakis, Chairman
Fulton County Commission
141 Pryor Street, SW
Atlanta, GA 30303

RE: Development of Regional Impact Review
Ellard

Dear Mitch:

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

Along with our finding I would like to add that we are very pleased to see that the proposed development has incorporated the traditional neighborhood development standards that were discussed in *Blueprints for Success*, the development seminars evolving from Vision 2020. Also we are very pleased to see the preservation of so much land in the Chattahoochee Corridor, the proposed preservation of the historically significant farm buildings, and the small scale mixed-use type of development.

Enclosed is a copy of our final report from the review and a copy of comments received.

Please let us know if you need anything further in this regard.

Sincerely,

Harry West
Director

Enclosure

c Ms. Nancy Leathers, Fulton County
Mr. Ron Sprinkle, Civil Design, Inc.
Mr. Wayne Shackelford, GDOT
Mr. Harold Reheis, GEPD
Mr. Rick Brooks, GDCA
Ms. Sally Bethea, Upper Chattahoochee Riverkeeper

Facility: Ellard
Preliminary Report: January 13, 1997
Final Report: January 31, 1997

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.

According to information submitted with the review, the single-family portion is consistent with the plan, but not the apartment and office/commercial portions.

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

No inconsistencies were identified.

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

No.

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

According to regional averages, the development could accommodate a population of 755, including 171 students, and 650 jobs. However, since this is proposed to be a "village" commercial and office area, the applicant estimates short-term employment at 300 and long-term at 150.

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

ARC has not reviewed any major developments or developments of regional impact in the immediate vicinity.

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

No, the property has been a farm for three generations and existing farm homes will remain.

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 property proposed for development is in Fulton County on the north bank of the Chattahoochee River and is also bounded by Holcomb Bridge Road. 35° 59' 30" / 84° 17'

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

The site is across the River and Holcomb Bridge Road from Gwinnett County and is also near DeKalb County.

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

No.

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?

According to information submitted with the review, it is anticipated that the development will generate $2,268,570 in annual property tax at build out.

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

300.

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 of a neo-traditional village will have a positive effect and could serve as a model for many features proposed in Blueprints for Success, the development seminars evolving from Vision 2020.

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?

Recommendations Regarding Storm Water Pollution

The proposed development is located within the Chattahoochee River watershed, a large water supply watershed. Steps should be taken to limit the amount of pollutants (BOD, phosphorus, total suspended solids, and metals) that will be produced during and after construction. Such pollutants threaten water quality in the adjacent stretch of the upper Chattahoochee River and in the downstream reaches. During construction, the project should conform to the county's erosion and sediment control requirements.

ARC staff has estimated the amount of pollutants that will be produced after construction of the proposed Ellard community development. These estimates were based on some simplifying assumptions for runoff coefficients and typical pollutant loading factors (lbs/ac/year). The loading factors are based on the results of regional storm water monitoring data from the Atlanta Region. The following table summarizes the results of the analysis for each land use and the total site.

Land Coverage	Total Phosphorus (lbs/yr)	Total Suspended Solids (lbs/yr)	BOD (lbs/yr)	Zinc (lbs/yr)	Lead (lbs/yr)
Single Family (121.749 ac.)	131.2	97,480.6	4,836.5	30.0	7.5
Apartments (23.60 ac)	18.1	10,361.2	1,140.7	13.3	1.9
Commercial (19.992 ac)	18.8	10,760.3	1,184.6	13.8	2.0
Total (165.341 ac)	**168.1**	**118,602.1**	**7,161.8**	**57.1**	**11.4**

If the development is approved, Fulton County should take steps to mitigate potential impacts. The Interim Regional Storm Water Quality Management Guidelines, adopted by the Atlanta Region, provide suggestions for addressing storm water quality. These guidelines offer technical guidance for the control of post-development pollution in storm water (find attached).

Both the low impervious surface percentages and structural controls proposed for the development will help to mitigate negative effects associated with storm water runoff. ARC strongly supports the establishment of agreements / contracts addressing long-term inspection and maintenance of storm water runoff controls. ARC recommends that the developer be required to submit a 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 should be included in a formal, legally binding maintenance agreement between the County and the responsible party.

The formal maintenance agreement between the developer and Fulton County should allow for periodic inspections of the storm water facilities 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 until a fully executed maintenance agreement is in place.

Recommendations Regarding the Metropolitan River Protection Act

Of the approximately 165.4 acres included in the Ellard proposal, about 159.4 acres are within the 2000-foot deep Chattahoochee River Corridor, and are subject to review for consistency with the standards of the Chattahoochee Corridor Plan, as required by the Metropolitan River Protection Act (MRPA). No Corridor review has been submitted at this time. However, the applicant is aware of the Plan and its requirements, and has been working with ARC and Fulton staff.

The following three items in the DRI application must be addressed before the Metro River review is submitted:

1. The DRI materials do not show the 500-year floodplain of the river, and do not indicate the 35-foot height limit above the natural, undisturbed grade that is required in that floodplain under Part 2.B.(4) of the Plan. This will affect a number of the proposed riverfront lots and will remain a requirement for construction in the floodplain regardless of whether the proposed height variance requested in the rezoning is granted.

2. The two downstreammost riverfront lots, Lots 35 and 36, appear to be shallower than the other riverfront lots, with the distance between the street and the 150-foot impervious surface river setback on the two lots ranging between 130 and 150 feet. We recommend that the applicant consider the realignment of the street, or any other effective measures, to insure that enough room is available between the 150-foot setback and the rear of the houses built on these lots to insure that enough room is available between the rear of the houses and the 150-foot setback to allow the future addition of accessory structures (such as pools and decks) without intruding into the setback. While the other riverfront lots appear deep enough to allow accessory structures between the houses and the 150-foot setback, we recommend that on all riverfront lots, the houses be designed and sited to insure enough room is available in the backyards allow the future addition of accessory structures (such as pools and decks) without intruding into the 150-foot impervious surface setback.

3. We also recommend that, for future owners' benefit, notices be attached to all recorded plats of all riverfront lots stating that no land disturbance is permitted within the 50-foot riverfront natural vegetative buffer, and no structures or impervious surfaces are allowed within the 150 foot impervious surface river setback. In addition, any deed restrictions, easements (such as the open space easement indicated in the DRI materials) or other permanent restriction method that would clearly limit development outside of the 150-foot setback (or further from the river, if the applicant desires) would also be useful in minimizing the risk of future buffer violations.

Finally, regardless of any changes in the proposed site plan, individual lot configurations or in proposed street setbacks, the project will need to conform to all applicable Plan standards in order to be found consistent with the Plan when the Corridor review application is submitted

HISTORIC RESOURCES

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

No. However, a 12 acre contiguous parcel to be retained by the Garrard Family includes historically significant farm buildings

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?

The farm buildings are proposed to be retained and may be restored.

INFRASTRUCTURE
Transportation

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

Land Use	Sq. Feet Rooms or Units	Weekday	AM Peak Hour Enter	AM Peak Hour Exit	PM Peak Hour Enter	PM Peak Hour Exit
Single Family	104	1,070	22	61	72	40
Apartments	330	2,097	40	125	124	69
Retail	200,000	10,899	154	90	510	510
Office	100,000	1,403	170	21	32	154
Total		15,469	386	297	738	773

The above trip generation figures were calculated using the Institute of Traffic 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 1995 GDOT coverage counts from area facilities that will likely provide the primary routes for traveling to the proposed development. 2010 volumes for these facilities were obtained from the ARC Regional Transportation Model.

Facility	1995 Number of Lanes	1995 Volume	1995 V/C Ratio	2010 Number of Lanes	Forecast 2010 Volume	2010 V/C Ratio
Holcomb Bridge Rd/SR 140 from Nesbit Ferry Rd. to Spalding Dr.	**4**	43,124	0.67	**4**	79,900	1.22

The above table indicates that Holcomb Bridge Rd/SR 140 currently operates at an acceptable level of service. However, future 2010 volumes indicate that Holcomb Bridge Rd/SR 140 will be severely congested.

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

The ARC's adopted Atlanta Regional Transportation Improvement Program FY 1996 - FY 2001 (TIP) includes one proposed transportation projects in the vicinity of this development:

> FN 087 SR 140/Holcomb Bridge Road between Barnwell Rd. and Nesbit Ferry Rd. Safety related improvements at various intersections. Construction is underway.

In addition, the Long Range Element of ARC's Regional Transportation Plan: 2010 includes two proposed projects in the vicinity of the proposed development:

> FN 047 Spalding Drive from Mount Vernon Rd to Holcomb Bridge Rd. Widen Spalding Drive from two lanes to four lanes. All project phases are scheduled for FY 2002.
>
> FN 060 Nesbit Ferry Rd. from SR 140/Holcomb Bridge Rd. to Old Alabama Road. Widen Nesbit Ferry Rd. from two lanes to four lanes. All project phases are scheduled for FY 2002.

The Atlanta Region Bicycle Transportation and Pedestrian Walkways Plan, 1995 Update includes the following facilities:

> SR 140/Houze Rd. and Holcomb Bridge Rd. from Roswell Rd. to Gwinnett County has been identified as a bicycle and pedestrian corridor. A Class 1 multi-use trail separated from the roadway is proposed. All project phases are scheduled for FY 2002 or later.
>
> Dunwoody Club Drive from Roberts Dr. to Dekalb County has been identified as a bicycle and pedestrian corridor. A Class 1 multi-use trail separated from the roadway is proposed. All project phases are scheduled for FY 2002 or later.

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, however it is within the MARTA service area.

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

No.

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

None.

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?

There are no other DRI's or other major developments in the vicinity of this proposed development.

This part of North Fulton County continues to experience new multi-family, single family, and commercial development. Traffic continues to increase on SR 140 and in the vicinity of this site as a result of continued development activity in North Fulton and Gwinnett counties.

According to future 2010 traffic volumes, SR 140 will be over capacity and very congested. The proposed development is estimated to produce 15,469 weekday vehicle trips at buildout. These trips will be in addition to the projected 2010 traffic volumes on Holcomb Bridge Rd, resulting in a total of 95,369 daily trips on this portion of Holcomb Bridge Rd. With this additional traffic, traffic conditions will further deteriorate as Holcomb Bridge Rd. will be over capacity (V/C 1.46) and be severely congested.

While the proposed mixture of land uses could potentially reduce automobile traffic and this type of land use mix should be encouraged, it is unlikely that a significant reduction in the amount of automobile traffic will occur. However, a well-planned pedestrian and bicycle system integrated throughout the development that also connects to adjacent multi-family development would serve to maximize the potential for reducing automobile trips and improve mobility and accessibility for residents and workers within the development as well as the immediate area. Access easements to future pedestrian and bicycle projects listed above should be included within the development.

In order to reduce the impact of this development and ensure the integrity and efficient operation of the Atlanta Region's transportation facilities, the developer and County officials should work with ARC, MARTA and the Georgia Department of Transportation to identify appropriate transportation projects and programs that can be formulated and included in local and regional transportation plans.

AIR QUALITY IMPACT

ANALYSIS METHODOLOGY

The emissions analysis for the Ellard development was based on trip generation estimates for the facility. The estimated emissions are based on light duty gas vehicles (passenger automobiles) for a mix of peak and off-peak speeds. Due to the fact that this development is planned as mixed use it was assumed for this analysis that a portion of the trips generated by this facility would be internal trips.

RESULTS OF ANALYSIS

Estimates for both hydrocarbons and nitrogen oxides resulting from this development are presented in the following table:

	TONS PER YEAR	TONS PER DAY
Nitrogen Oxides	16.8	.065
Hydrocarbons	11.4	.044

Despite the fact that this analysis reveals an increase in pollutants it should not necessarily be viewed as having a negative impact on the region's air quality as properly planned and developed mixed use facilities have a potential for helping improve the region's air quality.

INFRASTRUCTURE
Wastewater and Sewage

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

Regional averages suggest 0.16MGD.

Which facility will treat wastewater from the project?

John's Creek.

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

7.0MGD capacity.
5.5MGD average flow.

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

ARC previously reviewed major developments which projected 4.563MGD additional flow to John's Creek. However, most of those projects are completed and included in the current flow or are no longer proposed as reviewed.

INFRASTRUCTURE
Water Supply and Treatment

How much water will the proposed project demand?

Again, according to regional averages, 0.19MGD.

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

Sufficient water should be available from the Atlanta -Fulton Water Treatment Plant, which is in close proximity to the development.

INFRASTRUCTURE
Solid Waste

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

Approximately 1,440 - 2,057 tons. Waste collection and disposal is by private companies and is not regulated by the 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.

INFRASTRUCTURE

Other facilities

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

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

No.

HOUSING

Will the proposed project create a demand for additional housing?

The proposed village includes both single- and multi- family housing.

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

Again the village contains housing as well as office and commercial.

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. 1996 median family income of $52,100 for Atlanta MSA.

DEVELOPMENTS OF REGIONAL IMPACT
Comments from Affected Parties Form

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

Name of Commenting Organization: DeKalb County

Address: 1300 Commerce Dr. 6th Floor
Decatur GA 30030

Contact Person: Mary Dennis Telephone Number: 404-371-2155

Do you believe your jurisdiction will be affected by the proposed development? ____Yes X No

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

(Attach Additional Pages if Necessary)

Form Completed By: MARY Dennis Title: Sr. Planner

Signature: Mary E. Dennis Date: 1/27/97

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

The Georgia Conservancy

Printed on recycled paper

January 31, 1997

Ms. Nancy Leathers
Fulton County Department of Planning and
Economic Development
Suite 5001
141 Pryor Street SW
Atlanta, Georgia 30303

Re: Proposed Rezoning in North Fulton for Ellard

Dear Ms. Leathers:

I appreciate the opportunity to comment on the proposed rezoning for Ellard in north Fulton. While it would be ideal if this property were completely preserved through a citizen land trust, the Georgia Conservancy strongly supports the proposed development. As proposed, the development would be an economically and environmentally sound use of the property. Our primary reasons for support are greenspace preservation and air quality.

Greenspace

The Conservancy praises the developer's proposal to set aside 62.25 acres of the 165 acres via restrictive covenant and conservation easement along with 30 additional acres which will be set aside as non-restricted open space. Equally important, the developer has purposefully concentrated the structures away from the most environmentally sensitive features of the property. From the Conservancy's perspective, the environmental quality of this land would be greatly damaged if the entire property were merely divided in one acre single family residences. The greenspace preservation designs and implementation plan of the Ellard developers could be considered a model for developments being considered in the undeveloped portions of Fulton county.

Air Quality

The 13-county Atlanta region is classified as a "serious" nonattainment area for ground-level ozone. The vehicular emissions of nitrogen oxides, one of two primary contributors to ground-level ozone, are the primary cause of this degraded air quality status. In order for the region to continue to enjoy healthy economic growth, the region must begin to understand fully the linkages between land use, transportation and air quality. Developments that do not take all practicable steps to minimize negative air quality impacts make future economic

development in your county more difficult. In effect, the region currently is developing within the context of a limited nitrogen oxides budget.

A growing body of research indicates that compact, mixed-use, pedestrian-friendly developments generate up to 20 percent fewer vehicular trips as compared to disconnected pods of the same land uses. It is likely that Ellard will result in fewer vehicular trips and shortened trip lengths, thereby minimizing negative air quality impacts compared to a less progressive land use. Ellard's cohesive, pedestrian-friendly design of the apartment, retail and office development along Holcomb Bridge Road could be viewed as a model for high-intensity developments being proposed throughout Fulton county.

By design, Ellard preserves greenspace and minimizes air quality impacts. The Conservancy hopes that Ellard is the first of many new neo-traditional communities that will allow the region to continue growing within the context of the Clean Air Act's requirements for breathable air. In the future, the Conservancy encourages local governments to insist upon interparcel access for high-intensity land uses. Also, the Conservancy hopes to see neo-traditional developments that can provide housing for a diverse range of household incomes. Please do not hesitate to call me or Eric Meyer at (404) 876-2900 if you have any questions regarding our comments.

Sincerely yours,

Carolyn Hatcher

CAROLYN BOYD HATCHER
President and CEO

cc: Beverly Rhea, Atlanta Regional Commission
Fulton County Commission Members
Pete Calabro, Habersham Investment and Development Corporation

Metropolitan Atlanta Rapid Transit Authority

January 28, 1997

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

Subject: **Development of Regional Impact -- Ellard/Holcomb Bridge Road**

Dear Ms. Rhea:

The Metropolitan Atlanta Rapid Transit Authority has reviewed the documentation for a Development of Regional Impact for Ellard on Holcomb Bridge Road in North Fulton County. The proposed development is designated as a neo-traditional community which indicates that alternative modes of transportation other than the automobile will be promoted. Contrary to the information on the review form, MARTA does not currently provide bus service to this site. MARTA would like to discuss how we could provide improved service to this major project.

Thank you for the opportunity to review this proposal.

Sincerely,

Gloria J. Gaines
Vice President of Planning

cc: File

2424 Piedmont Road Atlanta, Georgia 30324-3330 (404) 848-5000

United States Department of the Interior

NATIONAL PARK SERVICE
CHATTAHOOCHEE RIVER NATIONAL RECREATION AREA
1978 Island Ford Parkway
Atlanta, GA 30350-3400

IN REPLY REFER TO:
L3215(CHAT)

JAN 27 1997

Ms. Beverly Rhea
Review Coordinator
Atlanta Regional Commission
3715 Northside Parkway
200 Northcreek, Suite 300
Atlanta, GA 30335

Dear Ms. Rhea:

Thank you for the opportunity to comment on the Development of Regional Impact (DRI) - Ellard. The Chattahoochee River National Recreation Area (CRNRA) has not seen a copy of a site plan for Ellard and can not comment on specific portions of the plan.

We are encouraged to note that 27 acres will be set aside as "nature preserves" for areas which may be "maintained or un-maintained and will include **most** of the creeks and wetland area." CRNRA wishes to see **all** of the creeks and wetlands included and a consistent 500' undisturbed buffer along the Chattahoochee. Buffers along the creeks should be a minimum of 50' or larger and be undisturbed as well.

As always, we are concerned with stormwater retention and runoff which produces additional sedimentation to the river. Providing buffers and paying close attention to stormwater system design and implementation is of great value to the protection of the river. CRNRA does not specifically oppose this development as presented since it does not appear to have a direct adverse affect on the purposed for which the park was created. However, we remain concerned over the difficult-to-measure accumulative affect of rapid continual development in the river corridor.

Sincerely,

Ken C. Garvin
Acting Superintendent

UPPER CHATTAHOOCHEE

RIVERKEEPER

Your River Your Future

January 22, 1997

Post-it® Fax Note 7671	Date 1/22	# of pages ▶ 2
To Beverly Rhea	From Sally Bethea	
Co./Dept. ARC	Co. Riverkeeper	
Phone #	Phone # 816-9888	
Fax # 364-2599	Fax #	

VIA FACSIMILE

Randy Beck
Fulton County Planning Commissic
(FAX # 730-7818)

RE: Proposed Ellard Development on the Chattahoochee River
(at Holcomb Bridge, Fulton County)

Dear Mr. Beck:

On December 17, 1997, Mary Johnson and I, representing the Upper Chattahoochee Riverkeeper ("Riverkeeper"), met with Pete Calabro, President of Habersham Investment and Development Corp., developer of the Ellard site ("Ellard"), to discuss the plans for this project. Our main questions concerned the residential part of the development along the banks of the River and the plans for stormwater management and erosion/sediment control during and after construction.

In general we were pleased to learn that the residential section will be of a low density and will be constructed in the pasture area of the site and not in the steep terrain areas, which will significantly decrease the problems associated with stormwater runoff, and that the required setback from the River of 150 feet will be increased to 200 to 500 feet. It is also our understanding that the two streams on this site will not be piped and will be preserved in common areas. (It should be noted that at this time the final erosion control plans for this site have not been finalized and thus, we have not reviewed them. Riverkeeper will review these plans in early February and will provide any appropriate comments after that review.)

While Riverkeeper would prefer that any tract of land along the Chattahoochee River be preserved, Riverkeeper has found the development plans we have reviewed to date have taken into account the sensitive environmental aspects of this property. We are committed, however, to continuing to monitor this project as it proceeds and will be in contact with the developer regarding any problems or concerns that arise. If you have any

P O Box 7338 Atlanta, Georgia 30357-0338
404-816-9888 Fax 404-816-3613
Email Riverkeep@mindspring.com www.buckhead.org/riverkeeper

questions or would like to further discuss this project, please call Mary Johnson or me at (404) 816-9888.

Sincerely,

Sally

Sally S. Bethea
Executive Director and Riverkeeper

cc: Beverly Rhea, Atlanta Regional Commission
Pete Calabro, Habersham Investment and Development Corp.

DEVELOPMENTS OF REGIONAL IMPACT
Comments from Affected Parties Form

Project I.D. Ellard Development
(From Request for Comments Form)

Name of Commenting Organization: Georgia Department of Transportation
Address: Georgia Department of Transportation
No. 2 Capitol Square
Atlanta, Georgia 30334
Contact Person: George Boulineau Telephone Number: 656-0610

Do you believe your jurisdiction will be affected by the proposed development X Yes No
Please describe the effects (positive and/or negative) the proposed project could have on your jurisdiction:

"ELLARD DEVELOPMENT"

This development will have a impact on existing and proposed transportation facilities. The applicant needs to address what roadway capacity improvements, travel demand strategies and related development patterns can be implemented to either support or mitigate the transportation demands of the proposed project initially and at build out. The intersection improvement at Holcomb Bridge Road and Barnwell Road will not mitigate the transportation needs.

The development build out will place it in a similar transportation position that has happened, and is continuing to happen in north Fulton County. The area is experiencing major transportation problems. The proposed development will generate additional vehicle miles of travel, which could adversely affect air quality in the region.

(Attach Additional Pages if Necessary)

Form Completed By: Donald W. Mills Title: USPE 3

Signature: Donald W Mills Date: 1-24-97

DCA/OCP 10/7/91

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

FAX NO. 404-364-2599

ELLARD

The property proposed for development as a neo-traditional community consists of 164.381 acres on the southwest side of Holcomb Bridge Road to the Chattahoochee River in Fulton County. It is part of the Garrard farm which has existed for three generations on both sides of Holcomb Bridge Road. Currently the property on the northeast side of Holcomb Bridge Road is being developed by the family as a golf driving range. The family also will retain 81.825 acres generally across from the driving range, where the existing farm homes and buildings are located. Most of the property in the Ellard Plan (158.383 acres of 164.381) is within the Chattahoochee River Corridor.

Development of this neo-traditional community is necessitating three zoning and several variance applications. The zoning applications include Z96-112 for the 121.749 acre "single-family" portion, Z96-113 for the 23.6 acre "multi-family" portion, and Z96-114 for the 19.92 "office and commercial" portion.

ARC's review covers the comprehensive development, all components of which are necessary to the village concept.

May 22, 1995

ARC Storm Water Management Task Force
INTERIM STORM WATER QUALITY MANAGEMENT GUIDELINES

Introduction

The following are suggested interim guidelines for local governments that want to protect and improve water quality by minimizing the potential harmful impacts generated by pollution in storm water runoff from urban land uses. These guidelines are focused on practices to minimize long-term impacts of developed areas on water quality. In general, the objectives of these interim guidelines include minimizing imperviousness, providing areas to capture overland flow of storm water and allow it to infiltrate into the soil, treating other runoff that leaves a developed site and designing sites to protect water quality.

Although many pollutants in storm water runoff must be considered in storm water design, one of the primary pollutants used as a design parameter is total suspended solids, or TSS. The following table is provided as information on post-development characteristics of average annual TSS loads (pounds per acre per year) associated with various land uses and development types. The source of this information is based on storm water samples collected for the Atlanta Region Storm Water Characterization Study and is supplemented with national data for the non-urban land uses.

Land Use	TSS (lbs/ac/yr.)
Forest/Open	235
Agriculture/Pasture/Cropland	327
Large Lot Single Family (>2ac)	355
Low Density S.F. (1-2ac)	447
Low-Medium Density S.F. (0.5-1.0ac)	639
Medium Density S.F. (0.25-0.5ac)	801
Townhouse/Apartment	605
Commercial	983
Office/Light Industrial	708
Heavy Industrial	795

The Atlanta Region Storm Water Management Task Force is working to develop a detailed manual of Best Management Practices (BMPs) for reducing TSS and other pollutants in storm water runoff from urban areas. The Task Force generated the following protection measures as interim recommendations to be used until the BMP manual is completed. This guidance document includes a variety of recommended practices which are presented below as options for developers and engineers to consider in designing controls for storm water runoff quality from developed areas. These practices are options and may be used alone or in combination - selection of appropriate controls will be site-specific.

Practice 1: Minimize Impervious Surface

This option may be most appropriately applied to larger sites. Minimizing the amount of impervious surface on a site allows for more infiltration of storm water into the ground, thereby reducing both pollutants and the runoff from the site. This approach to managing storm water runoff does not require extensive maintenance. Therefore, when possible, limiting impervious surface on a site should be encouraged. This basically involves leaving part of a site undeveloped to achieve lower percentages of impervious surface. It is recommended that impervious surface on a site be limited to the impervious surface equivalent to medium density, single family residential (approximately 1/4 - 1/2 acre average lot sizes) development. This type of development typically has 25% or less impervious surface. If a developer restricts impervious surface to these levels, construction of structural controls for water quality would probably not be necessary. Any development more dense than medium density single family residential should employ structural controls (see Practice 2 below).

The development site should be planned so that open space areas act as a pollutant filter and buffer for storm water flow from the site. Environmentally sensitive portions of a development site such as river and stream corridors and wetlands should be targeted for the undeveloped, "open space" or "greenbelt" areas. Local governments can encourage the concept of "cluster development," which allows higher levels of impervious (over 25%, for example) on portions of a site if sensitive areas are left undeveloped and maintained as undisturbed open space and they function to reduce the pollutant load in storm water runoff. Provisions should be made so that any open space areas are maintained in their natural state. If any development in these areas occurs in the future, the site would have to be re-reviewed, for storm water quality purposes, by the local government.

As a general guideline to local governments, several studies indicate that watershed-wide impervious surface amounts should not exceed 10-25% of the total land area in a water supply watershed.

Practice 2: Structural Controls

If the developer selects storm water management options which involve structural controls, it is important for local governments 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.

Wet Ponds

This practice recommends that structural controls be designed to control water quality in addition to the quantity controls typically required by local governments. At this time, the preferred approach to achieve water quality goals is construction of wet ponds. However, wet ponds may be more appropriately suited for larger developments or a group of developments. To develop an appropriate wet pond, additional storage provided above the permanent pool, combined with an appropriately designed outlet control structure, could give the necessary control for both storm water quality and quantity. Other structural control methods such as constructed wetlands could be explored as long as they were shown to achieve the desired pollutant removal.

As an example, the following design guidelines typically achieve a TSS reduction of 65%.

- Keep pond shape simple for good circulation.
- Inlets should be widely spaced from the outlets to avoid short-circuiting.
- Length should be three to five times the width.
- At least three, and preferably six to seven feet of permanent pool depth is needed for the majority of the pond.
- An underwater shelf (approximately 6"-12" deep and at least 3' wide) around the perimeter of the pond should be planted with rooted aquatic plant species.
- The pond should be designed with a sediment forebay which is easily accessible for maintenance and periodic cleaning. The forebay should be designed so as to minimize the resuspension of previously deposited sediments. The forebay storage capacity should be about 10% of the permanent pool storage to accommodate sediment accumulations over a 10- to 20-year period.
- The pond surface area should correspond to approximately 1% of the total drainage area. The minimum drainage area is 20-25 acres; the maximum is 100-300 acres depending on the level of imperviousness in the drainage basin.
- For water quality benefits, the pond should provide storage for runoff depths as listed below. The pond volume above the normal pool required for water quality may be calculated by multiplying the runoff depth by the contributing drainage area.

	Inches of Runoff	
Land Use	Sandy Soil	Clayey Soil
Freeways	0.35	0.40
Totally Paved Area	1.10	1.10
Industrial	0.85	0.90
Commercial	0.75	0.85
Schools	0.20	0.40
Low Density Res.	0.10	0.30
Medium Density Res.	0.15	0.35
High Density Res.	0.20	0.40
Developed Parks	0.50	0.60

- Storage for flood control should be provided above the level of storage provided for water quality benefits.
- The ratio of outlet flow rate to pond surface area for each stage value needs to be at the most 0.002 cfs/ft^2 for the water quality portion.

Extended Detention with Wetland Plantings

For smaller sites, with a drainage area less than 20-25 acres, it may be appropriate for the developer to use the option of a detention facility system established to provide water quality improvement through much longer detention times in contact with wetland plantings. Research has shown that storm water impounding areas which capture the first flush of runoff in a wetland setting for several days, in concert with an outlet control system for extending the detention times of larger storms, demonstrate measurable improvements in water quality. As an example, the following general design guidelines typically achieve a TSS reduction of between 45 and 80%.

If this type of system is desired, the pond area should follow the 1% of drainage basin rule presented above. The first flush capture should be at least 1/2 inch runoff from all impervious surfaces. The bottom of the pond should be cultivated with plantings indigenous to local wetlands. The first flush should be held so as to prevent its complete release in less than a 48 hour period. Each pond should provide the forebay sediment storage area already presented, as well as layout to prevent short circuit. Water velocity through the pond should be kept as low as possible with a maximum goal of 1/2 fps. Where possible, the outlet control system should be located adjacent to a public street to allow maximum access.

Maintenance of Structural Controls

If structural storm water controls are not maintained properly, they will provide no benefit. The developer's Storm Water Management Plan should require the developer to submit a detailed, long-term schedule for inspection and maintenance of any structural storm water facilities included. This schedule should be consistent with the maintenance policy of the local government and should describe all maintenance and inspection requirements and persons responsible for performing maintenance and inspection activities. Provisions should be made for the local government to inspect the facilities during and after construction.

Practice 3: Other Controls

Many of the following suggested controls are applicable to all developments. In general, the objectives of the following storm water runoff controls include minimizing imperviousness, providing areas to capture overland flow of storm water and allow it to infiltrate into the soil, reducing sediment flows, and avoiding directly connected impervious surface areas.

Building/Site Design

- Direct roof downspouts away from direct connection with impervious surfaces.
- Use grassed swales/vegetative filter strips whenever feasible for the drainage collection system (eliminate curb and gutter). Because of decreased storm water runoff, a reduction in pollutant loads will also be realized.
- Landscape with terraces rather than aggressive slopes.
- Encourage the use of bioengineering practices to rehabilitate unstable stream channels resulting from impacts of urbanization.
- Protect and maintain natural, undisturbed buffers adjacent to streams.
- Keep development out of wetland and floodplain areas. Encourage incorporating wetlands into landscaping, upgrading wetlands where possible.
- Design and locate buildings, roads, parking and landscaping to conform with the natural terrain and to retain natural features.
- Minimize impervious surface in river and stream corridors.

Erosion and Sediment Controls

- Leave generous buffers or natural areas between bare land areas.
- Regrass/landscape bare soil.
- Check for volume transfer and velocities of water downstream of project to protect downstream areas from increased erosion and to prevent streambank and natural area destruction.
- For controls during construction, refer to the State Erosion and Sediment Control Act and pending State construction permit.

Recommended References

- United States Environmental Protection Agency, January 1993. Guidance Specifying Management Measures for Sources of Nonpoint Pollution in Coastal Waters.

- Schueler, Thomas R., Department of Environmental Programs, Metropolitan Washington Council of Governments, July 1987. Controlling Urban Runoff: A Practical Manual for Planning and Designing Urban BMPs.

- Georgia Soil & Water Conservation Commission, Metro Atlanta Association of Conservation Districts, USDA Soil Conservation Service and Georgia Environmental Protection Division, 1994. Guidelines for Streambank Restoration.

- Pitt, Dr. Robert E. Excerpts from Detention Pond Design to Control Quality and Quantity, University of Alabama, Birmingham Continuing Education Workshop. For more information, contact David Eckhoff, Director of Engineering Professional Development, (205)934-8268.

- Camp Dresser & McKee, prepared for the Atlanta Region Storm Water Task Force, Atlanta Region Storm Water Characterization Study, 1993.