

The Northeast Georgia Regional Commission (NEGRC) has completed its review of the following Development of Regional Impact (DRI). This report contains the NEGRC's assessment of how the proposed project relates to the policies, programs, and projects articulated in the Regional Plan and Regional Resource Plan. Also included is an assessment of likely interjurisdictional impacts resulting from the proposed development, as well as all comments received from identified affected parties and others during the fifteen-day comment period.

The materials presented in this report are purely advisory and under no circumstances should be considered as binding or infringing upon the host jurisdiction's right to determine for itself the appropriateness of development within its boundaries.

Transmittal of this DRI report officially completes the DRI process. The submitting local government may proceed with whatever final official actions it deems appropriate regarding the proposed project, but it is encouraged to take the materials presented in the DRI report into consideration when rendering its decision.

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<b>Project I.D.:</b>	DRI #3046
<b>Name of Project:</b>	Braselton Highway Mixed-Use
<b>Name of Host Jurisdiction:</b>	Barrow County

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### Background

DRI review was initiated following a request for rezoning from AG (Agricultural) and AC (Agricultural-Commercial) to R-3 (High-Density Residential). Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 1/30/2020—2/13/2020.

### Proposed Development

Manor Restorations, LLC is proposing to construct 300 residential units and three acres of commercial lots on 91.57 acres of land (tax parcels XX024 008, XX024 008B, XX024 001, XX022 030), located at 1187 Highway 124 between Interstate 85 and Georgia Highway 124 in Barrow County, Georgia. The residential units are broken down into 147 detached single-family houses and 153 townhouses. Additionally, an estimated 29% of the property, preserved as open space, and 6 acres of constructed stormwater detention areas will manage runoff. An existing 0.79-acre pond will be converted into an on-site amenity for residents and visitors. Currently, the site is mixture of open fields and wooded areas with a few structures, including a house that will be removed during construction and a cell tower that will be preserved in its current location. An additional extension of the development on an adjacent 6.85-acre site (located between the proposed site and Hwy 124) is possible in the future.

### Compatibility with Existing Plans

The Barrow County Comprehensive Plan (updated in 2018) categorizes this site as part of the Rural Neighborhood Character Area, which is intended to “maintain the existing rural character of the county,” especially by emphasizing agricultural and large-lot residential uses while discouraging sewer expansion. Agricultural, Agricultural-Residential, and R-1 Low-Density Single-Family Residential are listed as

appropriate zoning categories. The proposed development appears inconsistent with the Rural Neighborhood Character Area: the proposed zoning category, R-3 High-Density Residential, is not listed as an appropriate zoning category for the Character Area and the project would require an extension of sewer service from the Town of Braselton.

The site is identified as “Developing” on the Northeast Georgia Regional Plan Update 2018 Regional Land Use Map (dated 6/7/2018). The site is also categorized as an “Area Requiring Special Attention” (ASRA) because it is in a part of the Region facing rapid development. The development recommendations for these ASRA’s include efficient land use that “maximizes the use of existing infrastructure and minimizes the conversion of undeveloped land at the periphery of the community.” While the project is technically mixed-use (the commercial element has not been planned yet), the neighborhood will be fundamentally dependent on automobiles for transportation with little integration between the proposed residential and commercial uses. The Regional Plan includes expansion of transportation mode choice as one of the goals and this project is inconsistent with that goal. Additionally, the project fails to meet the regional goal of supporting existing communities by building infill on sites that are already served by infrastructure.

Based on the Barrow County Comprehensive Plan and the Northeast Georgia Regional Plan, this development is likely better suited to other areas of the county.

### **Potential Interjurisdictional Impacts**

The applicant states that the project is unlikely to affect any of the environmental quality factors identified on the DRI Additional Form (including water supply watersheds, groundwater recharge areas, historic resources, and other environmentally sensitive resources). No Regionally Important Resources are identified within one (1) mile of the proposed site, and no Conservation areas are located within one mile of the site.

The National Wetland Inventory (NWI) identifies a 0.79-acre wetland onsite (a pond); 13 wetlands are located within one (1) mile of the site, totaling 83.5 acres. A stream forms part of the northern property line. The site plan shows a 25-foot state-mandated buffer will be observed plus additional buffering provided by planned open space. Six acres of the site will be dedicated to stormwater detention areas. The on-site pond will be preserved as an amenity for the development. Given the large size of the development, ensuring that these detention areas are properly constructed according to best practices and applicable regulations is essential. Maintaining the rural character of the area, as identified in the Barrow County Comprehensive Plan, should be a priority; attractive, native landscaping and the use of screens and buffers to mask the development from adjacent properties and right-of-way should be incorporated into the design.

Barrow County will be providing the water supply for the project, with an estimated demand of 0.096 MGD, which can be met with existing capacity. The Town of Braselton is listed as a future provider of sewer service, with an estimated daily demand of 0.1215 MGD. This service will require the construction of a 4,500 linear foot gravity sewer line and a new pump station, to be constructed by the Town of Braselton. The extension of new infrastructure could create more maintenance costs than tax revenue so the costs of maintenance should be factored into the decision to approve the development.

A letter prepared by Centerline Surveying & Land Planning identified an estimated 2,850 new daily vehicular trips will be generated by the new development. No traffic study has been performed; peak hour demand estimates were not provided. The developer plans to create two, four-lane entrances, each with a deceleration lane and a left turn lane to accelerate vehicle flow (two lanes in, two lanes out). While future residents may be able to walk to the yet-to-be-designed commercial site in this project, the surrounding development and

infrastructure dictate that this project will be auto-oriented. Generally speaking, auto-oriented development creates extra traffic, dramatically increases the cost of service delivery, and can negatively affect the physical and social health of residents. For this reason, both the Regional Plan and Comprehensive Plan recommend pedestrian- and bicycle-friendly design measures (mixture of housing densities, uses, and setbacks with connective sidewalks and trails) and the development of infill sites instead of peripheral greenfields like this property.

The applicant estimates the project will generate 964 tons of solid waste annually and states that sufficient landfill capacity is available.

The estimated value at build-out will be \$75,000,000. The estimated value-per-acre of the project is approximately \$815,000. The costs of maintaining associate public infrastructure throughout its life cycle should be calculated and weighed against the projected revenue generated by the project to ensure that Barrow County and the Town of Braselton do not commit more resources to servicing the property than they receive in tax revenue.

### **Comments from Affected Parties**

*Jason Dykes, Georgia Dept. of Transportation District 1*

- This development will have impacts at the SR 124 @ SR 211 signal.
- They mention commercial developments, but do not elaborate.
- With SR 124 being a two lane highway, access needs to be closely monitored for safety.
- ICE is required, so the main access needs to provide safety for projected traffic.
- Reduce the driveway width and remove the median within the right so that the proposed developer (in the future) across the street does not have alignment/shift through the intersection.
- Ensure that they are not discharging any water toward the interstate right of way.

February 10, 2020

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Northeast Georgia Regional Commission  
305 Research Drive  
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Re: Development of Regional Impact- Local Government (DRI#3046) Braselton Highway Mixed Use

The Gwinnett County Department of Planning and Development has reviewed the Regional Review Notification (Review) prepared by the Northeast Georgia Regional Commission regarding the proposed development of a residential and commercial development located on Parcels #XX024 008, XX024 008B, XX024 001, and XX022 030 in Barrow County, next to the Town of Braselton. The northern boundary of the site is along Interstate 85 approximately two thousand feet from the boundary with Gwinnett County. The proposed development consists of an approximately 91.57-acre parcel located at 1187 Highway 124 in Barrow County. The site is currently a mixture of open fields, wooded area, and an existing pond onsite and a stream at the northern property line. There is a house and cell tower on the acreage as well.

#### **PROPOSED DEVELOPMENT**

The applicant proposes to develop the site as a mixed-use development that would include approximately 300 residential units on the 91.57 acre site, resulting in a density of 3.2 units per acre. The proposed development would offer 147 detached single-family houses and 153 townhouses. Three acres will be commercial lots and six acres in stormwater detention. An existing pond will be converted into an on-site amenity and 29% of the property will be preserved as open space. An additional extension of the development to an adjacent 6.85 acre site is possible in the future.

According to the Official Zoning Map of Gwinnett County, the unincorporated portion of the County along the City Limits of the Town of Braselton in Gwinnett is residential in character, which includes numerous low density single-family residential developments zoned R100 (Single Family Residence District), R-100 CSO (Conservation Subdivision Overlay District), R-100 MOD (Modified Single-Family Development), and OSC (Open Space Conservation District) and single-family dwellings on large lots zoned RA-200 (Agriculture Residence District).

#### **COMPATIBILITY WITH EXISTING PLANS**

According to the Town of Braselton 2015 Comprehensive Plan Update (Plan), the site is located adjacent to the Highway 211 Gateway Character Area, which consists of four distinct categories: Chateau Elan, Commercial, Gateway Multi-Use, and Industrial. According to the Plan, the subject property is located adjacent to the Gateway Multi-Use Center, which is located at the northeast and southwest quadrant of the State Route 211 and Interstate 85 intersection. Highway 211 in this area is also called Farm Market Road. The subject property is located in the southwest quadrant, and the Plan suggests one multi-use quadrant should be promoted as a regional commercial center and the other as walkable mixed use of retail and senior/multi-story housing.

The Barrow County Future Land Use Map indicates this area as Rural Neighborhood and has the following zoning categories: Agricultural, Agricultural-Residential, and R-1 Low-Density Single-Family Residential listed as appropriate. Barrow County staff recommended approval with conditions of the proposed development. One of the conditions includes the application of Barrow County's Highway Corridor Overlay District.



The Gwinnett County 2040 Unified Plan Future Development Map classifies the general area as being located within an Emerging Suburban Character Area. Policies for this Character Area encourage single-family residential developments. Proposed and existing residential developments within the Emerging Suburban Character Area are typically low density, single-family subdivisions that do not exceed a density of 3.0 units per acre. However, the area in Barrow around the Highway 211 and Interstate 85 intersection could be considered a development node, and Gwinnett's Future Development Map has Character Areas for nodes that recommend denser development.

## **NATURAL RESOURCES**

The property contains a tributary stream of the Mulberry River, including Duncan Creek, which forms the northernmost property line. An existing pond is located south of the proposed parking lot near the proposed pocket park. There are 13 total wetlands and 83.46 acres of wetlands within a mile of the site. Also reflected on the submitted plan is the required 25-foot State Waters Buffer along the tributary creek and existing pond.

Gwinnett County is committed to the conservation, protection, and enhancement of the water quality in our streams and lakes. The potential impacts of the proposed mixed-use development suggest that conditions of zoning should be included requiring full buffers along all waterways meandering along and throughout the subject property.

## **INFRASTRUCTURE**

### **Transportation**

Access to the proposed developments would be provided through two entrances onto Highway 124. As indicated by a letter prepared by Centerline Surveying & Land Planning, 2,850 new daily vehicular trips will be generated by this new development. A traffic study was conducted and it was determined a deceleration lane and left turn lanes should be installed as well as a median divided entrance.

This transportation corridor is already experiencing high traffic volumes due to the density of residential neighborhoods in surrounding areas. The Georgia DOT 2018 Traffic Count for Highway 124 is 7,480 average annual daily trips (AADT). Gwinnett County anticipates that significant portions of the new 2,850 trips will impact traffic volume on Interstate 85 as well as Highway 124 (Braselton Highway) in Gwinnett.

Gwinnett County DOT has no comment at this time.

### **Water Supply and Wastewater**

According to the Review, Barrow County will be responsible for the water supply with an estimated demand of 0.096 million gallons per day (MGD), which can be met with existing capacity. The Town of Braselton is listed as a future provider of sewer service with an estimated daily demand of 0.1215 MGD. This will require the construction of a 4,500 linear foot gravity sewer line and new pump station by the Town of Braselton.

Sanitary sewer, resulting in minimal impact, would serve the development.

### **Stormwater Management**

According to the Review, the impervious surface coverage of proposed mixed-use development would be approximately 28-30% of the total area. The existing pond, according to the packet information, will be flanked with six acres of stormwater detention facilities. These are not depicted on the accompanying site plan.

Gwinnett County recommends that all work at a minimum be in accordance with the Georgia Stormwater Management Manual 2016 Edition. Additionally, the designated Stream Buffer Protection area and Best Stormwater Management Practices should diminish the impacts on stormwater management.

**SERVICES**

**Solid Waste**

No comment

Gwinnett County appreciates the opportunity to comment on this proposed development, and sincerely hopes that these comments will be given full consideration as the review process moves forward. Please feel free to contact me if you have any questions regarding Gwinnett County's position on this issue.

Best regards,

A handwritten signature in dark ink, appearing to read "Dan Reuter", followed by a long horizontal flourish.

Dan Reuter, Deputy Director  
Gwinnett County Department of Planning and Development