

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.

Project I.D.:	DRI #3121
Name of Project:	Stone Tract
Name of Host Jurisdiction:	Barrow County

Background

DRI review was initiated following the developer's request for a rezoning from agriculture (AG) to commercial (C-2) and residential (R-3) from Barrow County. Potentially affected parties were asked to submit comments on the proposal during the 15-day period of August 7-22, 2020.

Proposed Development

Southern Real Estate Holdings, LLC is proposing a mixed-use project consisting of 37,500 sq. ft. of commercial space, 312 apartments, and 158 townhomes on 54 acres at 103 Lec Stone Road in unincorporated Barrow County. The proposed development would occupy property totaling 54 acres at the intersection of GA-211 and Freeman Johnson Road. The project would have a street running through the middle of the site that would connect to both of the aforementioned roads. Additionally, four (4) stormwater management areas will be constructed to handle runoff. The site plan shows that 23% of the site will be dedicated to open space in compliance with Barrow County's 20% minimum open space requirement. The site plan also shows 50-foot buffers are proposed between the project and adjacent properties. Currently, the site is mostly wooded and undeveloped, with the exception of one house and a dirt road—both of which will be removed if the project is constructed. The project would be constructed in one phase with a completion date between 2024 and 2026.

Compatibility with Existing Plans

The site is identified on the Barrow County Comprehensive Plan's Future Development Map (dated 9/14/18) as a Commercial Corridor. The intent of this corridor is to "maintain well-functioning corridors that serve local needs and facilitate traffic flow without encroaching on adjacent neighborhoods." Future land uses include service, retail, and office. C-2 General Commercial is listed as an appropriate zoning category for this area.

Residential land uses are not listed as appropriate in this area. Design principles include access management elements like minimizing curb cuts and inter-parcel access, adequate screening between corridor uses and adjacent residential areas, high quality building materials, formal landscaping, limited grading and clearing, internal sidewalks, and public water and sewer service. The applicant did not provide renderings, setbacks, driveway/garage locations, or other design standards so it is not possible to determine the overall quality of the proposed development, but the project layout appears consistent with the comprehensive plan's recommendations.

The site is identified as "Developing" on the Northeast Georgia Regional Plan's Regional Land Use Map (dated 6/7/2018). The site is also located in the Rapid Development portion of Barrow County, as labeled on the Areas Requiring Special Attention Map (dated 6/7/2018). The Regional Plan encourages development patterns that preserve open space through clustering, a mix of uses and housing types, shared parking, and neighborhood commercial centers in these kinds of areas. The commercial components of mixed-use properties should have attractive and accessible businesses for the people living in the residential portion of the project. Multi-modal transportation options are strongly encouraged to reduce the number of new automobile trips that a project may create. Based on these principles, the NEGRC recommends that any front-entry driveways to the townhomes be long enough to accommodate one vehicle without encroaching on the sidewalk crossing. The NEGRC also recommends re-orienting the commercial retail to front the proposed new street (with parking to the side or rear of the building) so that it is accessible and attractive to residents walking over from the residential areas. Furthermore, a path should be constructed between the apartments and the commercial areas to create a short, direct, walkable connection for residents. The planned parking spaces may be excessive and could be reduced to minimize stormwater runoff, present a more walkable environment, and create additional land for valuable buildings. The design should maximize shared parking opportunities to minimize large surface lots, including incorporation of on-street parking. Given the current uncertainty for brick-and-mortar establishments in the United States, the commercial properties should be built with the flexibility to handle multiple types of uses.

No Regionally Important Resources are identified within one (1) mile of the proposed site.

Potential Interjurisdictional Impacts

The applicant states that the project would likely affect wetlands and floodplains but would not impact any of the other environmental quality factors identified on the DRI Additional Form, including water supply watersheds, groundwater recharge areas, protected mountain and river corridors, historic resources, and other environmentally sensitive resources.

The National Wetland Inventory (NWI) does not identify any wetlands onsite; 55 acres of wetlands are located within one (1) mile of the site. The Northeast Georgia Regional Plan's Conservation and Development Map (dated 7/19/2018) identifies 4.8 acres of "Conservation" area onsite and 203 acres of Conservation area are within one (1) mile of the site.

The applicant states that 35% of the site would be covered in impervious surfaces. Grass-covered swales, landscape areas, preservation of buffers, and detention facilities would be designed to mitigate stormwater impacts. The site plan shows that a 50-foot stream buffer is proposed to protect the onsite stream and significant open space would be reserved around the stream. Reduction and rearrangement of parking and other impervious surface areas would help reduce the project's impacts on nearby waterways and stormwater infrastructure. Green infrastructure and low-impact development measures should be incorporated into the design. At minimum, the project should be in accordance with the current Georgia Stormwater Manual.

The project would be served by the Barrow County water and sewer systems with an estimated daily demand of 0.2 MGD for each system. The applicant indicated that these demands can be covered by existing capacity. No water line extension would be required, but a one (1) mile sewer line extension would be necessary. The applicant estimates the project will generate 650 tons of solid waste annually and that sufficient landfill capacity exists to handle this waste.

A memorandum with estimated trip generation for the proposed project (dated July 9, 2020), provided by Marc R. Acampora, PE, LLC, estimates that 3,880 new trips would be generated by the project. An estimated 199 new trips would be generated in the AM peak hour, and 302 new trips would be generated in the PM peak hour. The applicant states that transportation improvements will be necessary, but that these improvements will be specified after the Georgia Department of Transportation (GDOT) has reviewed the project.

The applicant estimates that the project will be worth \$155 million at completion, and generate \$1.8 million in property taxes, plus \$600,000 in sales taxes annually. This translates to \$33,333 in property tax-value-per-acre. As a condition of approval, Barrow County should ensure that the tax revenue generated by the property can sustain the life cycle costs of public services and infrastructure needed to serve the site.

Comments from Affected Parties

Alan Hood, Georgia Dept. of Transportation

The proposed [mixed-use project] on a 54-acre tract is located more than 10 miles from any civil airport, and is located outside any FAA approach or departure surfaces, and airport compatible land use areas, and does not appear to impact any airport.

However, if any construction equipment reaches 200' above ground or higher, an FAA Form 7460-1 must be submitted to the Federal Aviation Administration. That may be done online at <https://oeaaa.faa.gov>. The FAA must be in receipt of the notification, no later than 120 days prior to construction. The FAA will evaluate the potential impact of the project on protected airspace associated with the airports and advise the proponent if any action is necessary.

Thank you for the opportunity to comment on the proposed development.

Catherine Long, Gwinnett County (see below)



August 21, 2020

Stephen Jaques
Northeast Georgia Regional Commission
305 Research Drive
Athens, Georgia 30605-2795

Re: Development of Regional Impact- Barrow County (DRI#3121) Stone Tract

The Gwinnett County Department of Planning and Development has reviewed the Regional Review Notification (Review) regarding the proposed mixed-use project located on Parcels #XX025 056 and XX025 056A in unincorporated Barrow County. The northern boundary of the site is GA Highway 211, and consists of a 54-acre parcel located at 103 Lec Stone Road in unincorporated Barrow County. The site is currently wooded and undeveloped and includes an existing house.

PROPOSED DEVELOPMENT

Southern Real Estate Holdings, LLC proposes a mixed-use development that includes approximately 312 apartments and 158 townhomes, and 37,500 sq. ft. of commercial space. Four stormwater management areas will be constructed and the site plan shows 23% of the site will be open space. A street will be constructed through the middle of the site and connect SR211 and Freeman Johnson Road.

According to the Official Zoning Map of Barrow County, the site is currently zoned for agriculture (AG). Land uses associated with this include very low density detached single-family residences, including residential subdivisions that protect natural features and set aside communal open space. The rezoning request is for zoning of commercial (C-2) and residential (R-3).

COMPATIBILITY WITH EXISTING PLANS

According to the Barrow County Comprehensive Plan 2018 Update (Plan), the site is identified as a Commercial Corridor, and the intent of this character area is to "maintain well-functioning corridors that serve local needs and facilitate traffic flow without encroaching on adjacent neighborhoods". This area is represented by roadway frontage where commercial uses are established or, in limited instances, are transitioning from residential to low-intensity commercial uses. This includes portions of SR 211 where the proposed site is located.

According to the Northeast Georgia Regional Plan's Regional Land Use Map the proposed site is located within the Developing category which states that it is likely to become urbanized and require new urban services in the next 20 years. It is also located within the Threatened Regionally Important Resources as part of the Areas Requiring Special Attention Map which includes protection of natural, cultural and environmentally sensitive resources. Additional features include parking areas, bicycle facilities and stormwater mitigation.

NATURAL RESOURCES

There is an unnamed stream of Mulberry River that runs across the northeastern portion of the site. The applicant states that the project will likely affect floodplains and wetlands. Although no wetlands are within the project area, according to the National Wetland Inventory, there are 55 acres within a mile of the site. The Northeast Georgia Regional Plan Conservation and Development Map (7/19/2018) shows 4.8 acres of Conservation area within the project site and 203 acres of Conservation area located within one mile of the site. The site plan indicates the 50-ft stream buffer and uses open space to protect this sensitive area.

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

The applicant states that the transportation improvements will be finalized once the plan has been reviewed by the Georgia Department of Transportation (DOT). Vehicular access will be provided at one location on SR 211 and one location on Freeman Johnson Road. As stated in the memorandum prepared by Marc R. Acampora, PE, LLC, 199 new trips will be generated in the AM peak hour, and 302 new trips would be generated in the PM peak hour. A total of 3,880 daily trips will be generated.

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 7,540 average annual daily trips (AADT). Gwinnett County anticipates that significant portions of the new 3,880 trips will impact traffic volume on Interstate 85 as well as Highway 124 (Braselton Highway) in Gwinnett. Gwinnett County DOT has no comment.

Water Supply and Wastewater

According to the Review, Barrow County will be responsible for the water supply with an estimated demand of 0.2 million gallons per day (MGD), which can be met with existing capacity. One mile of sewer line extension is needed for this project. The exact wastewater disposal need to this development has not been specified. Barrow County is working with the Town of Braselton on a wastewater agreement to service this area.

Stormwater Management

According to the Review, the impervious surface coverage of proposed mixed-use development would be approximately 35% of the total area. The site plan shows the location of four stormwater management areas to manage runoff. It also indicates the proposed 50-foot stream buffer to protect the stream.

The proposed project is located within the Barrow County service area; therefore Gwinnett County Water Resources does not have any comments on water or sewer.

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.

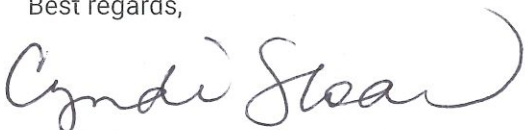
SERVICES

Solid Waste

The project is currently expected to generate 650 tons.

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,



Cyndi Sloan, Acting Division Director
Gwinnett County Department of Planning and Development