



DEVELOPMENTS OF REGIONAL IMPACT

Final Report

Northeast Georgia Regional Commission • 305 Research Drive, Athens, Georgia • www.negrc.org

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 #3254
Name of Project:	Tom Miller Road Project
Name of Host Jurisdiction:	Barrow County

Background

DRI review was initiated following the developer’s request for a rezoning from Barrow County. The property is zoned for AG (Agriculture) and would be rezoned to R-2 (Medium-Density Residential). Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 03/08/21—03/23/21.

Proposed Development

Ashton Atlanta Residential LLC is proposing construction of 629 residential units on a 356-acre site at 979 Tom Miller Road in Barrow County. The project would include 506 single-family houses and 123 townhomes. The project would be split between both sides of the road with 62 units being built on the east side and 444 units on west side of the road (parcel numbers: XX053-006, XX053-006A, XX053-007, XX053-209). Additionally, at least four stormwater management areas and three amenity areas would be constructed. Currently, the site is a mixture of open fields and wooded areas with multiple ponds. An agricultural building would be removed during construction. The completion date of the project has not been determined.

Compatibility with Existing Plans

The site is identified as “Suburban Neighborhood” on the Barrow County Comprehensive Plan’s Future Development Map (dated 10/24/18). The intent of this area is to, “Preserve established neighborhoods and create quality new residential development that is consistent with surrounding suburban densities. [...] Future development will be consistent with single-family homes at low to moderate densities (1.0-2.3 dwelling units/acre).” The Plan encourages high quality building materials and site design, maintenance of tree cover, and open space within new subdivisions. R-2 is listed as appropriate zoning. The applicant has not provided illustrations or renderings that would allow judgement on the quality of materials. Most of the site is open

fields, but the existing tree cover would likely be significantly reduced. Otherwise, the proposal appears generally consistent with the Comprehensive Plan.

The site is identified as “Developing” on the [Northeast Georgia Regional Plan](#)’s Regional Land Use Map (dated 6/7/2018). The Regional Plan recommends development that matches the region’s workforce, prices in the lifecycle cost of infrastructure, creates a sense of place, builds a compact development pattern on existing infrastructure, creates diverse and affordable housing, and compliments existing and planned transportation options—especially non-automobile transportation modes.

The Regional Plan also identifies the site as an Area Requiring Special Attention. Specifically, the site sits in “Conservation” areas that are considered “Threatened Regionally Important Resources.” In addition to the previous recommendations, the Plan also encourages projects that steer development away from sensitive areas, protect sensitive environmental resources (especially by setting them aside as park and recreation areas), enlist natural features to enhance the site, reduce parking, facilitate multi-modal transportation, and make use of green infrastructure. The [Northeast Georgia Resource Management Plan for Regionally Important Resources](#) (Resource Management Plan) identifies the Apalachee River as a Regionally Important Resource (RIR) due to its value as a regional source of drinking water and as a conservation and recreational resource. No other RIRs are identified within one mile of the site.

Based on these recommendations, there are significant inconsistencies between the proposal and the Regional Plan. The proposal does not appear to price in the lifecycle cost of infrastructure or create a sense of place, does not build in a compact pattern, does not provide diverse housing, and makes a limited effort to provide multi-modal transportation options. The proposed 50 and 70-foot lots may create more infrastructure maintenance expenses than the tax revenue of these properties can support. Adding house-scaled multi-unit buildings like quadplexes would increase the diversity of housing types at price points that accommodate a larger range of households and living situations. The proposal does not provide access to adjacent parcels so future development would necessarily be funneled onto Tom Miller Road—leading to the early onset of traffic congestion. A network of narrow, gridded streets with inter-parcel access (including street stubs) would improve transportation access and provide a foundation for a greater sense of place. Where feasible, the developer should consider alley-fed parking to also improve the sense of place. Alternatively, garages can be detached and placed in the rear of the lot so that the front of the house creates a welcoming environment for people—especially if usable front porches are provided. On-street parking can also be substituted for off-street parking. If on-street parking will not be regularly used, the street should be narrowed down from the proposed 26 feet since the current width will incentivize speeding. The Northeast Georgia Regional Commission’s [Complete Streets Guide](#) provides recommendations on building neighborhood streets that are safe and comfortable for people walking, biking, and playing. At minimum, sidewalks should be provided on both sides of the street throughout the development.

As designed, the proposed development does little to acknowledge the existing natural features on and adjacent to the site. While there are several small greens, the developer should consider incorporating the ponds, creeks, and river into publicly accessible greenspace with a network of trails. This would enhance the amenities and the sense of place in the neighborhood, encourage residents to appreciate and protect the adjacent Apalachee River, and provide opportunities for future trail connections to surrounding areas.

Potential Interjurisdictional Impacts

The applicant states that the project would likely impact wetlands, protected river corridors, and floodplains. They indicated that the other environmental quality factors identified on the DRI Additional Form, including

water supply watersheds, groundwater recharge areas, protected mountains, historic resources, and other environmentally sensitive resources, are unlikely to be impacted. The site plan shows the Apalachee River and its associated wetlands form the western border of the site. An estimated 20% of the site would be covered in impervious surfaces, and four stormwater management areas are planned to manage runoff in addition to 10 existing on-site ponds. The site plan proposes 50-foot undisturbed buffers and 75-foot impervious setbacks along the onsite streams, per county requirements; a 100-foot undisturbed buffer and 150-foot impervious setback are identified along the Apalachee River, per county requirements. Five roads would cross onsite streams, encroaching on these county buffers and the 25-foot state minimum buffer area. Multiple proposed residential lots include county undisturbed buffer and impervious setback areas; two single-family detached lots also include portions of state-required undisturbed buffer areas. This appears to violate the intent of the buffers. The NEGRC recommends private lots and roadways not overlap required buffer areas.

The National Wetland Inventory (NWI) identifies 29 acres of wetlands onsite and 427 acres of wetlands within one mile of the site. The Northeast Georgia Regional Plan's Conservation and Development Map (dated 7/19/2018) identifies 341 acres of "Conservation" land onsite and 3,159 acres of "Conservation" land within one mile of the site. Of this "Conservation" acreage, 302 of the onsite acres and 2,513 of the one-mile acreage is part of the Northeast Georgia Green Infrastructure Network as identified in the Resource Management Plan. The Apalachee River forms the western border of the site, and this section of the river is considered a "Threatened Regionally Important Resource" by the Regional Plan. The Apalachee River is a tributary of the Oconee River, a major source of drinking water for communities within Northeast Georgia. The presence of so many acres of sensitive environmental resources indicates this site may be sub-optimal for intense development without significant mitigation measures. The proposal should be designed to minimize disruption to the existing streams and associated ponds, wetlands, and floodplains to avoid future erosion, flooding, and degraded water quality onsite and downstream from the site, through low impact development measures like bioswales and other green infrastructure. Should this project be approved, heightened protection and monitoring measures during and following development should be put in place to ensure the Apalachee River is not impacted. At minimum, the project should be in accordance with the latest edition of the Georgia Stormwater Management Manual (Blue Book) and meet all relevant EPD requirements.

A&R Engineering Inc. performed a traffic study and estimated the project would generate 5,567 total trips, 422 morning peak hour trips, and 553 afternoon peak hour trips. The project is broken into two sections by Tom Miller Road. On the eastern side of the road, 62 units and two driveways would be constructed. On the western side, 444 units (including all the townhomes) and three driveways would be constructed. No additional improvements are anticipated at this point. The proposed road network will necessarily funnel all new trips to Tom Miller Road, creating additional trips in an area that is not easily accessible without a car. A gridded street network with stubs to adjacent future development sites would help create a long-term network that is capable of handling more trips. In addition, the multiple proposed road crossings through streams and 100-year flood zones will likely result in ongoing, costly repairs and maintenance.

The project would be served by the City of Winder's water system with an estimated daily demand of 0.157 MGD and Barrow County's sewer system with an estimated daily demand of 0.157 MGD. The applicant states that these demands can be covered by existing capacity. No water or sewer line extensions are anticipated.

The applicant estimates the project would generate 2,201.5 tons of solid waste annually and that sufficient landfill capacity exists to handle this waste. No hazardous waste would be generated.

The applicant estimates that the project would be worth \$176 million and generate \$2,207,180 in annual tax revenue. On a per-acre basis, the project would be worth an estimated \$494,382 and generate \$6,200 in annual revenue. Prior to approval, the County should measure the life cycle costs of the infrastructure needed to serve this project to ensure that they would not be committing to more maintenance expenses than the new tax revenue can cover.

Comments from Affected Parties

Parker Niebauer, D1TO Traffic Operations Supervisor, Georgia Department of Transportation

GDOT recommends investigating SR 316 @ Patrick Mill. The DRI preliminary investigation suggests that SR 81 @ Tom Miller Road warrants a traffic signal. GDOT is looking at the possibility of constructing a roundabout at this location. Improvements may be required here if additional traffic impacts this intersection (e.g. such as adding turn lanes). The study needs to show how directional distribution was determined. The study uses a 3% growth rate to project traffic volumes. This appears to be a high estimate, so we would like to see how this rate was determined.



March 23, 2021

Stephen Jaques
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Re: Development of Regional Impact- Tom Miller Road Project (DRI# 3254)

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 construction of a 356-acre mixed-residential community on Tom Miller Road, just across the Apalachee River boundary with southeastern Gwinnett County. There will be 506 single-family houses and 123 townhomes upon the project's completion at an undetermined date. The site is approximately two miles south of Highway 316 in unincorporated Barrow County. A rezoning request has initiated this DRI.

The following comments are offered:

This section of the Apalachee River features wetlands and environmentally sensitive areas on both sides of the county boundary, and southeast into Walton County. The information submitted indicates buffers are planned along the river and several tributary streams that traverse the site. The unincorporated Gwinnett subdivisions of Wynterberry, Stone Hall Plantation, and Biltmore Woods are just across the Apalachee River from the site. Gwinnett County recommends that all applicable regulations and practical measures be taken to protect the waters of the Apalachee River during and after construction of the project.

The submittal indicates significant traffic volume expected from the development at buildout. There was no clear breakdown of the portion of these trips. The traffic impact must be assumed to be significant. This highlights the importance of recent cooperative efforts between jurisdictions to increase the capacity of Highway 316. The service level on Highway 316 is of regional concern, as seen in efforts like the Georgia Innovation Corridor involving several counties.

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, Planning Division Director
Gwinnett County Department of Planning and Development