

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 #3331
Name of Project:	Neely Farms
Name of Host Jurisdiction:	City of Covington

Background

DRI review was initiated following the developer’s request for permits and plat approval from the City of Covington. Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 05/26/21 – 06/10/21.

Proposed Development

Neely Farms Family Limited Partnership LLLP is proposing construction of a mixed-use development, including 60 acres of general commercial, two single-family detached neighborhoods (180 and 150 lots, each), a 227-lot townhome neighborhood, and 30 acres of mixed-use (including condos, hotel, restaurants, and civic space). In addition, surface parking lots, interior roads, stormwater detention areas, a dog park, playground, and other associated infrastructure and amenities are proposed to serve the project. The proposed development would occupy property totaling 207.95 acres along the east side of US Hwy 36 (Dr MLK Jr Ave), in the City of Covington, between Scenic Parkway and the Eastside Walking Trail. The project site is less than one mile south of US-278 and less than two miles south of the I-20 interchange (parcel numbers: C082 005, - 005B, - 005C, - 005D, - 005E, and - 005F). Currently, the site is undeveloped, consisting mostly of fields, with wooded areas around the perimeters and the riparian areas, which include two existing ponds (one known as “The Quarry at Neely Farms”) and onsite stream segments. It is unclear whether the properties are actively being used for agriculture. Development of the project will involve multiple phases, beginning with the single-family detached and townhome neighborhoods (estimated completion by July 2023), with an estimated overall completion by July 2024. Should future changes be proposed that could significantly alter the overall impact of the development, as submitted, an additional DRI Review may be required prior to approval.

Compatibility with Existing Plans

The site is identified as “Mixed-Use Corridor (MXC)” on the City of Covington Comprehensive Plan’s Future Land Use Map (dated 11/28/2017). The MXC consists of a “medium-density mixed-use district (p.9).” CM (Corridor Mixed-Use) is listed as the only zoning district appropriate for MXC future land use areas. The Covington Zoning Ordinance describes CM as providing “a location for residences, retail, goods and services and offices to satisfy the common and frequent needs of the city’s businesses and residents,” noting that developments within the CM district have “design standards and design parameters to encourage a pedestrian-friendly traditional urban form (Sec 16.16.010.G).”

The site is identified as “Developed” 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.

Generally, the project appears to comply with the local and regional land-use plans. However, there are several critical design decisions that will determine if the project creates a “pedestrian-friendly traditional urban form.” To create a pedestrian-friendly environment, the automobile needs to be de-emphasized. Among other things, this means the garage entry should not be the defining feature of the front of the house. The NEGRC notes with approval that the townhomes appear to rear-load the parking, thus allowing the front door to resume its place as the focal point of the house. The NEGRC encourages the same design for the single-family houses. If that is not possible, the developer should consider detaching the garage and locating it at the rear of the property. Alternatively, garages may not be necessary if sufficient on-street parking is provided. Stoops for townhomes and front porches for detached houses should be included to create a semi-public space where residents can casually interact with neighbors and form community.

Street trees and slow streets should also be included to create a safe and comfortable environment for walking and playing. Safe neighborhood streets should be shaded, narrow, include regularly-used on-street parking, and be arranged in a highly-connected street network such as a grid. Pedestrian and bicycle accessibility should be improved by adding additional connections within the street network as well as building in stubs for adjacent properties to tie into if they are developed. Refer to the NEGRC’s Complete Streets Guide for recommendations on designing safe neighborhood streets.

The commercial section of the proposal needs a significant rearrangement of the parking to create a pedestrian-friendly environment. It appears that all of the commercial structures are arranged with their front door aimed at a parking lot. To create a pedestrian-friendly environment, the NEGRC recommends that commercial front doors open onto a sidewalk and parking be provided through on-street spaces as well as lots in the rear of the building. The area required for parking spaces should also be reduced by using stacked parking and shared parking.

Potential Interjurisdictional Impacts

The applicant indicated that the project will likely affect an approximately four-acre former rock quarry, identified as an environmentally sensitive resource. It is not expected to affect 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, floodplains, or historic resources. In addition to the old

quarry (now a pond), a small pond is located on the southern end of the site and streams appear along the eastern portion of the site.

The National Wetland Inventory (NWI) identifies just over four acres of wetlands onsite and 583.3 acres of wetlands within one mile of the site. The Northeast Georgia Regional Plan's Conservation and Development Map (dated 7/19/2018) identifies just under four acres of "Conservation" land onsite and 573.7 acres of "Conservation" land within one mile of the site. A total of 74.2 acres of the Northeast Georgia Green Infrastructure Network are identified onsite by the Northeast Georgia Resource Management Plan for Regionally Important Resources. A total of 1,319.3 Green Infrastructure Network acres are identified within one mile of the proposed project. The site is not within one mile of a Regionally Important Resource site, according to the Northeast Georgia Resource Management Plan for Regionally Important Resources.

An estimated 60% of the commercial portion and 30% of the residential portion of the site would be covered in impervious surfaces. Due to the current conceptual status of much of the mixed-use and commercial portions of the proposed development, it is unclear what the exact, total impervious surface cover will be when the project is completed. The applicant stated that detention ponds and buffers on all state waters would be used to reduce the impact of stormwater runoff on downstream areas.

The site plan shows proposed detention ponds and buffer areas along the streams; however, no legend, notation, or labels identify them as such nor explicitly state that these areas will be protected. The proposal should be designed to minimize disruption to the existing streams and associated wetlands and floodplains to avoid future erosion, flooding, and degraded water quality onsite and downstream from the site. Low impact design measures, like bioswales, should be incorporated into the project design. 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. prepared a Trip Generation Traffic Study (dated May 12, 2021), estimating the project will produce an average of 1,959 AM Peak Hour and 3,225 PM Peak Hour trips per day (a total of 36,703 two-way trips). The Trip Generation Study provided did not include any findings; the applicant indicated that a roundabout at Neely Farms Pkwy and GA Hwy 36 is proposed. In addition, seven access driveways are proposed to serve the project: two on Dr MLK Jr Ave and five on Scenic Parkway. It appears some sidewalks may be proposed in the detached single-family portion of the development; however, no bicycle or pedestrian infrastructure is actually called out on the submitted site plan. As previously mentioned, there are improvements and best practices that should be considered to enable this project to meet the spirit of the local and regional plans for the area. Although multiple access points are included, the City should consider asking for additional stubs to adjacent property to create the kind of highly-connected network that allows for increased freedom of movement and greater accessibility within the City.

The project would be served by the City of Covington water and sewer systems, with estimated daily demands of 0.74 MGD for each. The applicant states that these demands can be covered by existing capacity and that 0.5-mile sewer and 0.5-mile water line extensions would be required to serve the project. The applicant estimates the project would generate 552 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 \$350 million at build-out in 2023 and generate \$5 million in annual local taxes. On a per-acre basis, the project would be worth approximately \$1.7 million and generate approximately \$24,000 in tax revenue. Prior to approval, the City 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

Robert J. Post, Mayor, Town of Between

This project will have little if any impact on the Town of Between. I do feel that the density of the proposed project exceeds the capability of the road system in the area. The trip count for the existing roads will create massive congestion especially during peak hours. I'm also concerned with the ability of the school system to handle the influx of students and the overburdening of the other public services including police, fire and EMS. The growth is always looked at as a positive, but one must ask at what price?