

## James Abraham

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**From:** James Abraham  
**Sent:** Wednesday, April 15, 2015 8:53 AM  
**To:** 'tlassetter@coweta.ga.us'; 'Tolleson, Robert'  
**Cc:** Jonathan Tuley; 'sparker@coweta.ga.us'; 'Donna Black'; 'sshanks@moorebass.com'; 'smoore@moorebass.com'; 'thandley@coweta.ga.us'; 'jamason@coweta.ga.us'; 'blake.barnett027@gmail.com'; 'Geoff Warr'; 'Laura Beall'; 'blovett@newnanutilities.org'; 'stolar@newnanutilities.org'; 'Tavores Edwards'; 'Dan Woods'; 'Donald Wilkerson'; 'Michael Presley'; 'Jon West'; DRI; Matt Markham; 'Rob Goodwin'; Jamie Fischer; Lanier Boatwright; Kimberly Dutton; Paul Jarrell; Joy Shirley; Robert Hiatt; Jeannie Brantley; Jan Edens; Sam Mukoro; Ben sewell; 'awhite@coweta.ga.us'; bob rolader; 'jsanto@atlantaregional.com'  
**Subject:** Fox Hall Farm DRI #: 2486 - ARC comments  
**Attachments:** Fox Hall Farms DRI ARC comments.pdf

Hon. Tim Lassetter and Mr. Robert Tolleson,

The Three Rivers Regional Commission closed its review and disseminated its final report and recommendations on Monday, April 13, 2015. However, after TRRC's closed both its public comments period (March 20 to April 6, 2015) and its final report (April 13, 2015), the Atlanta Regional Commission (ARC) sent its comments to TRRC.

We could not analyze and include those comments into our report for the reasons articulated above. Nonetheless, we consider them important enough to recommend that you attached them as an appendix to our official report, thought, late in submitting. I have attached them for your file and use. In the TRRC region, water supply watersheds are one of the most vital natural resources necessary to maintain an acceptable quality of life for the residents of the Three Rivers Region. According to the applicant, Storm water management will be provided by natural features to the greatest extent possible. The development will adhere to the following: conceptual storm water management plan, the utilization of storm water management facilities, where appropriate, and better site design practices in accordance with the Georgia Storm Water Management Manual will be utilize to minimize structural components.

In addition, Staff believes that Coweta County has local ordinances and an aggressive Comprehensive Plan in place that does protect such natural resources and development with Best Management Practices.

If you have any questions, please feel free to contact me at the information listed below.

Sincerely,

**James A. Abraham, Sr.**

*Planner*

Three Rivers Regional Commission

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## James Abraham

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**From:** Jonathan Tuley [JTuley@atlantaregional.com]  
**Sent:** Monday, April 13, 2015 5:42 PM  
**To:** James Abraham  
**Subject:** FW: Regional Review & Request for Comments, DRI #: 2486 Fox Hall Farms Residential Development, Unincorporated Coweta County  
**Attachments:** OUT OF REGION DRI - Fox Hall Farms - Coweta - 3-30-15.doc

James,

Apologies for the delay in getting this to you. Please see attached comments from ARC Natural Resources staff. Thank you for the opportunity to review and comment on this development.

Kind Regards,

Jon Tuley, AICP  
Principal Planner  
**Atlanta Regional Commission**  
**regional impact + local relevance**  
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**From:** Jim Santo  
**Sent:** Monday, April 13, 2015 8:02 AM  
**To:** Jonathan Tuley  
**Subject:** RE: Regional Review & Request for Comments, DRI #: 2486 Fox Hall Farms Residential Development, Unincorporated Coweta County

Jon,

Here are the NRD comments on Fox Hall. Chris had also mentioned that parts of White Oak Creek may be on the State 303D list for not meeting water quality standards. I was out Friday and didn't have an e-mail from him, so I didn't include any language to that effect in the comments. Besides, I don't think we have ever made those comments in a DRI in the past. Let me know if you need anything else.

**Jim Santo**  
Principal Planner

Natural Resources Division  
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**From:** Jonathan Tuley  
**Sent:** Friday, March 20, 2015 12:14 PM  
**To:** Dan Reuter; Jared Lombard; David Haynes; Daniel Studdard; Jean Hee P. Barrett; Jim Santo  
**Subject:** FW: Regional Review & Request for Comments, DRI #: 2486 Fox Hall Farms Residential Development, Unincorporated Coweta County

All,

We received a request for comments on a DRI in Coweta County. See below and attached for more information. Please send comments to me by 12:00 PM on April 13.

Let me know if you have any questions.

Jon Tuley, AICP  
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**From:** James Abraham [<mailto:jabraham@threeriversrc.com>]  
**Sent:** Friday, March 20, 2015 11:02 AM  
**To:** 'Barker, Steve'; 'steve.barker@cowetaschools.org'; Jonathan Tuley; 'Jon West'; Laura Beall; 'DRI@grta.org'; [dwoods@dot.ga.gov](mailto:dwoods@dot.ga.gov); 'john.eaves@fultoncountyga.gov'; 'mayor@citypalmetto.com'; 'whshell@citypalmetto.com'; 'bdennard@grta.org'; 'Parker, Sandra'; 'mlbrackett@dhr.state.ga.us'; 'COddo@fayettecountyga.gov'; 'michael.charlson@fultoncountyga.gov'; 'msmith@carrollcountyga.com'; 'bskipper@carrollcountyga.com'; 'adoyal@bellsouth.net'; 'whatleypl@hotmail.com'; 'tlassetter@coweta.ga.us'; 'rtolleson@coweta.ga.us'; 'jboren@cowetawater.com'; 'kbrady@cityofnewnan.org'; 'Roller126@yahoo.com'; 'cityofHaralson@gmail.com'; 'dickford@gmail.com'; 'morelandtown@att.net'; 'lowens@senoia.com'; 'rferry@senoia.com'; 'cphillips@cityofnewnan.org'; [blovett@newnanutilities.org](mailto:blovett@newnanutilities.org); 'tdunnivant@cityofnewnan.org'; 'sburgtownhall@aol.com'; 'townofturin@charter.net'; 'lboone@heardcountyga.com'; 'wendellstaley@yahoo.com'; 'smorris@heardcountyga.com'; 'b.neely@meriwethercountyga.gov'; 'w.long@meriwethercountyga.gov'; 'rjohnson@spaldingcounty.com'; 'wwilson@spaldingcounty.com'; 'cjacobs@spaldingcounty.com'; 'pcrews@troupco.org'; 'ttentier@troupco.org'; 'nseegar@troupco.org'; 'ckrautler@atlantaregional.com'; 'Michelle.Macauley@fultoncountyga.gov'; 'Candace@newnancowetachamber.org'; 'anna.woodruff@dca.ga.gov'; 'chuck.mueller@dnr.state.ga.us'; 'Randy.Beck@fultoncountyga.gov'; 'jrorie@peachtree-city.org'; 'pfrisina@fayettecountyga.gov';

'stolar@newnanutilities.org'; 'Marci Simpkins'; 'r.garrett@meriwethercountyga.gov'; 'david.crass@dnr.state.ga.us'; 'afbryan@dhr.state.ga.us'; 'dlfields@dhr.state.ga.us'; 'Jeff.cown@dnr.state.ga.us'; 'Keith.bentley@dnr.state.ga.us'; 'James.capp@dnr.state.ga.us'; 'Judson.turner@dnr.sttae.ga.us'; 'luthersvilleclk@bellsouth.net'

**Cc:** Sam Mukoro; Jeannie Brantley; Lanier Boatwright; Paul Jarrell; Kimberly Dutton; Robert Hiatt; Jan Edens; Joy Shirley; 'doug.moore@cowetaschools.org'; 'mfouts@coweta.ga.us'; 'gwright@coweta.ga.us'; 'rbarnes@newnanutilities.org'; 'thowell@dot.ga.gov'; 'RGoodwin@GRTA.org'; 'jfischer@GRTA.org'; 'mpresley@dot.ga.gov'; 'mfowler@dot.ga.gov'; 'cvandyke@dot.ga.gov'; 'awhite@coweta.ga.us'; 'dowilkerson@dot.ga.gov'; 'tedwards@coweta.ga.us'; 'bsewell@coweta.ga.us'; 'rrolader@yahoo.com'; 'vince.bass@cowetaschools.net'; 'sshanks@moorebass.com'; 'donna@brent.us'; 'smooresmoore@coweta.ga.us'; 'thandley@coweta.ga.us'; 'jamason@coweta.ga.us'; 'blake.barnett027@gmail.com'; 'Geoff Warr'

**Subject:** Regional Review & Request for Comments, DRI #: 2486 Fox Hall Farms Residential Development, Unincorporated Coweta County

To all interested parties:

Please find attached DRI #: 2486 Fox Hall Farms Residential Development located in Unincorporated Coweta County. We have begun our review. Attached are our preliminary findings. We request that you or a member of your staff review the documents and provide any comments to TRRC by 5:00 p.m. on April 6, 2015.

The proposed development will consist of 499 Single Family Detached Housing Units located to the West of Al Roberts Road and 39 Single Family Detached Housing Units located to the East of Al Roberts Road which is a total of 538 lots or units. The site will comprise of three (3) access points; two will be located on Al Roberts Road and the other on Gordon Road. The project is named "Fox Hall Farm".

This DRI was triggered by two material elements or factors:

1. Housing – 538 Single Family Residential Units exceeding the thresholds section 110-12-3-.05(2), (5), Metropolitan Tier (thresholds table). Housing greater than 400 new lots or units.
2. Wastewater Treatment Facility – Section 110-12-3-.05 (2), (14). Metropolitan Tie (thresholds table). Wastewater Treatment Facility – new major conventional treatment facility or expansion of existing facility by more than 50%; or community septic treatment facilities exceeding 150,000 gallons per day or serving a development project that meets or exceed an applicable threshold as identified the DRI rules.

<b>Review Opened:</b>	<b>March 20, 2015</b>
<b>End of Comment Period:</b>	<b>April 6, 2015</b>
<b>Final Report Due:</b>	<b>April 13, 2015</b>

The application status can be viewed online on DCA website at <http://www.dca.ga.gov/DRI/AppSummary.aspx?driid=2489> and/or TRRC website at <http://www.threeriversrc.org/planning-dri.php>

Sincerely,

**James A. Abraham, Sr.**  
*Planner*  
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## OUT OF REGION DRI

### Fox Hall Farms Residential Development Coweta County Natural Resources Division Review Comments

April 3, 2015

#### **Water Supply Watershed and Stream Buffer Protection**

Based on information shown in Figure 5-3, *Water Supply Watersheds and Drinking Water Intakes* from the **Coweta County 2006-2026 Comprehensive Plan**, the project property is not in any existing or proposed public water supply watershed in the Metropolitan North Georgia Water Planning District. The project property is in the White Oak Creek watershed, which is part of the Flint River Watershed. There is a water supply intake on White Oak Creek for the City of Newnan, but it is upstream of the project site.

The USGS coverage for the project area shows several blue-line streams on, near or abutting the project property. White Oak Creek and a tributary, Little Sandy Creek, form the southern and western boundaries of the project property. Unnamed tributaries to White Oak also run through the property. All these streams, as well as any other applicable unmapped streams on the property, are subject to the County's Stream Buffer Ordinance, which requires a minimum 50-foot undisturbed buffer and a 75-foot impervious surface setback. These streams and any other waters of the state on this property are also be subject to the State 25-foot Sediment and Erosion Control Buffer.

#### **Water Supply and Wastewater Demand**

The DRI report by the Three Rivers Regional Commission indicates that the subdivision in this DRI consists of five phases. Per the report, Phases 1 and 2, with a total of 74 houses, have been completed and Phase 3, with 47 lots, is currently under construction. Phase 4 is proposed to have 130 houses on one-acre lots and Phase 5 will have 287 houses on 0.5-acre lots. At full build-out, the total subdivision would have 538 single-family houses as currently proposed.

The DRI report indicates that the water supply provider, the Coweta County Water and Sewerage Authority, has indicated that there is sufficient capacity to meet the proposed water demand of 0.884 MGD at full build-out in 2032. For wastewater, the report indicates that the existing capacity is not sufficient to serve the proposed project, which, per the report, shows a projected wastewater flow of 0.2123 MGD. Per the report, the applicant is proposing to develop an onsite decentralized wastewater treatment system built to Georgia EPD requirements and to the service provider's (Newnan Utilities) specifications for at least part of the subdivision. According to the report, ownership of the system will be turned over to Newnan Utilities for operation and maintenance in accordance with the County's service delivery strategy for such systems. The decentralized treatment system proposal is consistent with the proposed wastewater capacity expansions shown for Coweta County on Page B-7 of Appendix B, County Level Summaries, Wastewater Management Plans of the May 2009 Metropolitan North Georgia Water Planning District Wastewater Management Plan. In the Phasing Plan Table on Page B-7, the Newnan Utilities Decentralized Systems entry shows proposed expansions to 7.75 MGD by 2035. The predicted wastewater outflow at full build-out in 2032 of 0.2123 MGD is within the projected 2035 capacity for the Decentralized Systems.

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Out of Region DRI – Coweta County  
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However, there are problems with these water and wastewater projections. First, based on the numbers presented in the report, the project's projected 2032 water demand is based on all 538 single-family houses with an estimated average monthly demand per house of 5000 gallons, which is roughly 164 gallons per day per house. The May 2009 Metropolitan North Georgia Water Planning District Water Supply and Water Conservation Management Plan includes estimates for daily per capita water use in single-family houses for each county in the District, including Coweta. Per Table 3-2 in the District Plan's Section 3: Water Demand Forecasts, the total (indoor and outdoor) per capita single-family residential rate in Coweta is 83 gallons per capita (person) per day (gpcd), with an indoor rate of 66 gpcd. Using the District per capita estimates, the proposed water use rate of 164 gallons per day would indicate an average household size of only two persons (2.5 if outdoor use is not considered). Although house size is not provided for the whole subdivision, except for a minimum house size of 1725 SF, the wastewater estimates for 287 of the 538 proposed houses are based on five-bedrooms per house. Given the provided house size, it appears that the proposed water demand may be too low. More complete information on house sizes, and estimated household sizes, should be included, and the estimated demand should be recalculated to reflect the more detailed numbers.

Second, as mentioned above, the application indicates that the proposed onsite decentralized wastewater treatment system and the proposed wastewater estimates are only for the 287 houses in Phase 5. No information has been provided for either the 121 houses completed or under development now, or for the 130 houses proposed in Phase 4. Information should be included as to whether the houses in Phase 1 through 4 are on sewer or septic. If on sewer, the name of the service provider and its expected capacity should be included. If some phases are served by sewer and some by septic, the number of houses served by each needs to be included in the DRI information.

Third, it appears that different factors were used in estimating wastewater than those used for water demand. The DRI report provides a projected wastewater flow of 0.2123 MGD for the decentralized system for 287 houses in Phase 5. The report states that this estimate is based on a predicted demand of 150 gallons per day (gpd) per bedroom with an assumption of 5 bedrooms per house. This is 750 gpd per house. Based on the District single family per capita indoor use numbers, 750 gpd per house would mean an average of 11.4 persons per house. This is not consistent with the water demand estimates or for average household size, even for a 5 bedroom house. The numbers should be consistent throughout and based on accepted average household sizes for the size and type of house proposed .

**Storm Water/Water Quality**

All projects should adequately address the impacts of the proposed development on stormwater runoff and downstream water quality. During construction, projects should conform to the relevant state and federal erosion and sedimentation control requirements. After construction, water quality will be impacted due to polluted stormwater runoff. ARC has estimated the amount of pollutants produced after the construction of the entire proposed development, based on the submitted site plan. These estimates are based on some simplifying assumptions for typical pollutant loading factors (lbs/ac/yr).



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 Out of Region DRI – Coweta County  
 April 3, 2015  
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The loading factors are based on regional storm water monitoring data from the Atlanta Region with impervious areas based on estimated averages for land uses in the Region. Given the proposed rezoning areas and the relative lot sizes shown on the submitted site plan, the proposed uses for the proposed project are Forest/Open space, Low Density Single Family Residential (1-2 acre lot size), and Low-Medium Density Single Family Residential (0.5–1 acre lot size). Areas are based on the rezoning acreages provided. These numbers are guideline estimates only. Actual impervious percentages may be higher or lower than the estimate, and the pollutant loads will differ accordingly. The following table summarizes the results of the analysis:

**Estimated Pounds of Pollutants per Year**

Land Use	Land Area (ac)	Total Phosphorus	Total Nitrogen	BOD	TSS	Zinc	Lead
Forest/Open	270.10	21.61	162.06	2430.90	63473.50	0.00	0.00
Low Density SF (1-2ac)	243.23	145.94	671.31	5351.06	108723.81	34.05	7.30
Low-Med SF (0.5-1ac)	468.44	505.92	2211.04	15926.96	299333.16	126.48	28.11
<b>TOTAL</b>	<b>981.77</b>	<b>673.46</b>	<b>3044.41</b>	<b>23708.92</b>	<b>471530.47</b>	<b>160.53</b>	<b>35.40</b>

Total Percent Impervious: 13%

In order to address post-construction stormwater runoff quality, the project should adhere to the applicable Metropolitan North Georgia Water Planning District 2009 Watershed Management Plan’s Stormwater and Watershed Protection Ordinances, as adopted by the Coweta County. It should also implement stormwater management controls (structural and/or nonstructural) as found in the Georgia Stormwater Management Manual ([www.georgiastormwater.com](http://www.georgiastormwater.com)) and meet the stormwater management quantity and quality criteria outlined in the Manual. Where possible, the project should utilize the stormwater better site design concepts included in the Manual