

December 8, 2015

Mr. Justin Crighton, Planner
Ms. Theresa Owen, Planner
Planning & Government Services
Northeast Georgia Regional Commission
305 Research Drive
Athens, GA 30606

RE: OUT OF REGION DRI - REQUEST FOR COMMENTS Development of Regional Impact Request for Comments (Covington Town Center, DRI #: 2529, located in the City of Covington, Newton County.

Dear Mr. Crighton and Ms. Owen:

The Three Rivers Regional Commission (TRRC) has completed its outside regional review of the above subject matter, and we offer the following commentary:

TRANSPORTATION IMPACT

Regional context: The project is located in the City of Covington (Newton County) which is considered Metropolitan (i.e.: population +50,000). The Three Rivers Regional Commission (TRRC) recognizes that Newton County is not in the Georgia Regional Transportation Authority (GRTA) jurisdiction. As a result, pursuant to state law (OCGA §50-32-14), no GRTA review is required for this project. However, the Georgia Department of Transportation (GDOT) and the Atlanta Regional Commission (ARC) does have some limited, overlapping responsibilities/jurisdiction as Newton County does fall within the ARC Regional Plan. From a political jurisdictional viewpoint, Butts County abuts Newton County and although the project may appear to be within Newton County, in the City of Covington, from a transportation and shopping standpoint, it is within closer proximity to the City of Jackson which is in Butts County. Perhaps they should have been afforded the opportunity to comment on this DRI and any impact, if any to their political boundaries.

Mr. Justin Crighton, Planner
Ms. Theresa Owen, Planner
Planning & Government Services
Northeast Georgia Regional Commission
December 8, 2015
Page Two

Based on the DRI materials provided for review, it was disclosed that the applicant either did not or has not completed a traffic analysis of the project and its potential traffic generation impact to the area and region, as a result of this proposed development. Staff believes that in the interest of the region and all external affected agencies and local governments, a complete traffic analysis is critical showing any capacity issues and road improvements in the area.

Pursuant to the applicant Conceptual Master Plan, completed by Thomas & Hutton, a traffic study should include and address all the possible Land Use Codes based on the Institute of Transportation Engineers (ITE) Manual that coincides with the uses to include, but not limited to: Shops/Retail, Office/Bank, Hotel, Movie Theater, Major Anchors /Big Box Tenants, etc. These uses may have deviation and traffic patterns that may pose a potential to impact the area and the region. Will the development include pedestrian friendly design (walkways, sidewalks, bike paths, etc)?

NATURAL RESOURCES AND ENVIRONMENTAL IMPACT

Regional context: Both the regions and local water quality are paramount and adherence to the Georgia Clean Water Act. Therefore, staff review of the development is focused on the region's water supply and to exercise due diligence that green space requirements and that all developments within the region are designed, reviewed and approved by the local jurisdictions with a view to alternative approaches and methods to addressing storm water runoff and retention based on sound environmental engineering principles and best management practices (BMP's). The development should exhibit efficient use of natural resources, protection of environmentally sensitive areas of the region and the community of Covington. The encouragement of green building construction and renovation and the utilization of appropriate waste management techniques with empathizes on water conservation and reuse.

It is the responsibility of the host local jurisdictions to ensure that the development complied with Federal, State and local requirements with regards to waters of the state. The Region's water resources include rivers, water supply watersheds, significant groundwater recharge areas, wetlands, and stream corridors. These specific resources have been identified by the Georgia Department of Natural Resources (DNR) as State Vital Areas.

Mr. Justin Crighton, Planner
Ms. Theresa Owen, Planner
Planning & Government Services
Northeast Georgia Regional Commission
December 8, 2015
Page Three

In addition, these same resources are addressed in the DNR's Environmental Planning Criteria. The Environmental Planning Criteria is the portion of the state's Minimum Planning Standards that deals specifically with the protection of these water resources. Water sources in the region are important for the necessary day-to-day living activities of the inhabitants of the region.

Water sources are important for drinking, cooking, bathing, sewage treatment, industry, electrical plants, recreation, and irrigation of crops. These sources are vulnerable to human intrusion and drought. Any water supply watershed in the area where rainfall runoff drains into a river, stream or reservoir used downstream as a source of public drinking water supply. Water supply watersheds are one of the most vital natural resources necessary to maintain an acceptable quality of life for the residents of the State of Georgia.

Therefore, it is imperative that the City of Covington protect such natural resources and incorporate into this development Best Management Practices by way of ensuring that the development comply with their local ordinances as well.

ECONOMIC DEVELOPMENT IMPACT

Regional Impact: The Three Rivers Regional Commission (TRRC) recognized that the proposed development poses the potential to provide employment opportunities and luxuries those residents of the area desire to have a good quality of life. This mixed use development has the potential to be an added asset to the Region upon full completion.

Economic Prosperity to the Region can be achieved by encouraging development or expansion of businesses and industries that are suitable for the community and region. Factors to be considered when determining suitability include: job skills required, long-term sustainability, linkages to other economic activities in the region, impact on the resources of the area, or prospects for creating job opportunities that meet the needs of a diverse local workforce. The proposed mixed use development does appear to create those opportunities.

Mr. Justin Crighton, Planner
Ms. Theresa Owen, Planner
Planning & Government Services
Northeast Georgia Regional Commission
December 8, 2015
Page Four

HISTORICAL IMPACT

Regional context: The Three Rivers Regional Commission (TRRC) research and review of the submitted DRI did not revealed any historical significance of a regional impact, with the exception of, the family cemetery which has been disclosed in the DRI documents.

As cited by said document, the developer has entered into an agreement with the land owner for the possible relocation of the gravesites of ±8-10 graves. The Three Rivers Regional Commission (TRRC) has not indentified any negative impact that may have on the region.

OTHER GOVERNMENTAL IMPACT:

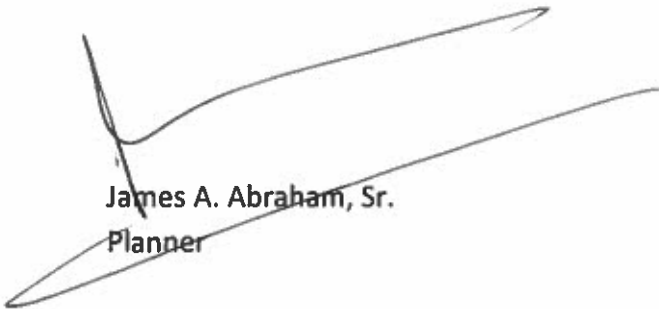
Regional context: The Three Rivers Regional Commission (TRRC) did not identify any negative impact on the region and local school systems from the proposed development. However, TRRC cautioned that there will be a potential for an increased demand on the following services: police, sheriff, courts, fire and EMS, roads, and general administration may experience an increased demand because of the nature of the proposed development and its mixed land uses. Based on the review documentations, the applicant is proposing offices, banks, hotel, Movie Theater, shops, retail, anchors/big box tenants which traditionally will have impact on these services.

School System: The Three Rivers Regional Commission (TRRC) did not identify any regional school system and/or the Newton County School System as being impacted from the proposed development because of it being "Mix use". Therefore, it will not yield any negative impact and or demands for educational system expansions.

Mr. Justin Crighton, Planner
Ms. Theresa Owen, Planner
Planning & Government Services
Northeast Georgia Regional Commission
December 8, 2015
Page Five

If you have any questions, concerns and/or clarification regarding TRRC's comments on this DRI, please feel free to contact me at the 678-692-0510 or email: jabraham@threeiversrc.com

Sincerely,



James A. Abraham, Sr.
Planner

cc: Jeannie Brantley, Planning Director
Lanier E. Boatwright, Executive Director