



MORGAN COUNTY PLANNING AND DEVELOPMENT

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Request for Comments RE: DRI-#1441, Morgan County **Submitted July 9, 2007**

Within the last 24 months, Morgan County Planning and Development staff has worked with Synergy Realty and their partners, Old Mill Realty, as they reviewed and revised the site plan for the proposed project. We have proposed that this project be linked to a development agreement, due to the size and multi-jurisdictional nature of the project. In addition to concerns addressed by the RDC and other commenting agencies, at minimum, we feel the following items need to be addressed by the developer.

1. **Access to the site.** Presently, access to the site is limited. Of the multiple routes to the site, all of them have their disadvantages for a project this size. Staff has expressed concerns about access to the site repeatedly, and the traffic impact analysis submitted by the developer with their application shows significant detriment to the LOS of several of our county intersections. As of the date of this memorandum, the developers have not proposed any improvements. Additionally, the revised concept plan submitted with the rezoning action shows that the new main entrance to the project is proposed to be on Kingston Road. Heretofore, the main entrance had been proposed off of Marshall Road at North Sugar Creek in Putnam County. Staff submits the following main areas of concern in regard to transportation as a result of this project.
 - a. *I-20 to Highway 441 South (Exit 114) to Cochran Road to Kingston Road:* As one of the most direct routes to this site, staff anticipate that a number of motorists coming from the metro-Atlanta community will use this route to get to the project and to the City of Madison. Cochran Road, though recently resurfaced, will not be sufficient to handle the traffic to this project over time. It is an old road – probably dating to the turn of the 20th century – running mostly through low density agricultural areas. The sub-surface preparation of the road may be unsuitable to prevent tearing of the asphalt over time due to traffic from this project. Additionally, staff has concerns about safety given the minimum distance of pavement and right-of-way, as well as sharp s-curves.
 - b. *I-20 to Seven Islands Road (Exit 121) to Cedar Grove Road to Kingston Road:* The developer has indicated that they anticipate that this will be the preferred route to get to the project by individuals coming from the metro-Atlanta community. Seven Islands Road is sufficient to accommodate the traffic created by this project, but Cedar Grove Road is not. Along some portions of the road, Cedar Grove Road has less than 18' feet of pavement and limited right-of-way, in addition to sharp s-curves. Staff has concerns about safety given these conditions.
 - c. *I-20 to Highway 441 North (Exit 114) to Highway 441 Bypass to Bethany Road to Kingston Road:* If the main project entrance will be located in Morgan County, Bethany Road is probably most suited to handle the traffic generated by this project. It has sufficient paved surface and right-of-way width to safely accommodate car traffic as well plan for potential widening in the future. There is no way to force traffic from this project to utilize this route, and given the fact that it requires an individual to navigate through the strip commercial development of Highway 441 between I-20 and the Madison bypass, it may prove to be an undesirable route for the average motorist in terms of convenience of access.
 - d. *I-20 to Highway 44 South (Exit 130 in Greene County) to Harmony Road (in Putnam County) to Parks Mill Road (in Putnam County) to North Sugar Creek Road at Marshall Road (in Putnam County):* This route was assumed to be best access to the project when the main entrance was located on Marshall Road at North Sugar Creek. It routes traffic down Highway 44, where DOT has already acknowledged the need for improvements due to the rapidly expanding Lake Oconee region. It goes through two major shopping/ retail complexes, and multiple smaller complexes, that have been developed to serve the needs of Lake Oconee residents. Improvements to Harmony Road have been anticipated due to the substantial level of growth along that road. The

weakness of this route is with North Sugar Creek and Marshall Road. The developer has indicated that they do not plan to improve Marshall Road, which runs along the border of the property in Morgan and Putnam counties. Marshall Road is approximately 11 feet wide, and it is neither paved nor substantially improved for stormwater run-off. Marshall Road needs to be paved to county standards for the entire length of the road to its terminal points at Lake Oconee and Little Road in Putnam County. The developers should also work with Putnam County to improve the shoulders on North Sugar Creek Road, including but not limiting contributing to any fees for right-of-way acquisitions to facilitate suitable grading and improvement of ditches.

2. **Project Entrances.** In accordance with the Morgan County Development Regulations §3.10.3, three project entrances, as proposed, can only accommodate 449 lots. This section requires an additional entrance for every additional 250 lots. Based on the estimate of 1801 residential lots, at minimum this project should have at least 8 points of access. We are willing to work with the developers to identify additional points for entrance into the project that may only be used for emergency purposes, however it is not acceptable to plan a project of this size with only three points of access. Additionally, the developers should plan to install dedicated center turn lanes, as well as acceleration and deceleration lanes into the project at their entrance identified on Kingston Road, and any future public entrance that may be located within Morgan County's jurisdiction. We would also strongly suggest that Putnam County consider a similar requirement for project entrances in their jurisdiction. Given the concerns expressed by staff in Section 1 regarding access to the site, the staff will also suggest that the entrances at Kingston Road and North Sugar Creek Road/ Marshall Road be installed and open at the same time before the first certificate of occupancy is issued to provide options of traffic to access state and federal highways, as well as commercial/ retail centers.
3. **Impact to public school system.** Staff expects the developers to fully cooperate with the Morgan County Board of Education and the Putnam County Board of Education to mitigate potential impacts on the school system as a condition of the proposed development agreement. The developer's traffic impact analysis has identified 682 single family detached housing units will be built in the project; this number alone could have a tremendous impact to the school system if those residences introduce children into the system. Additionally, staff feels it unwise to assume that without any type of mechanism to control occupancy of their residential units, that 1,135 units should be discounted as "recreational," and therefore bear no impact on the public school system. At minimum, the development should be planned so that no neighborhoods straddle the county lines, creating confusion about which school system children will need to attend, and the developer has been made aware that school buses will not travel on private roads in Morgan County. The concept plan submitted with the application indicates a school bus stop on Kingston Road in Morgan County, but no such provision has been indicated in Putnam County.
4. **Fire and Emergency Services protection.** Staff has consistently reiterated our concerns regarding the ability to serve the needs of the proposed project in regard to fire protection and emergency services. The concept plan indicates a space for a firehouse located at the project entrance on Kingston Road, however, the rezoning narrative provides no additional information in regard to addressing our concerns. Specifically, it is unknown if it is the intention of the developer to construct a fully-functional firehouse with all necessary equipment, or if they simply propose to set the land aside. Staff expects the exact requirements of providing fire and emergency service protection to this development to be addressed in the proposed development agreement.
5. **Multi-Jurisdictional Approval.** Staff has expressed concerns to the developer regarding the project encompassing multiple jurisdictions. Staff will not recommend that approval for the rezoning be given until the Putnam County Board of Commissioners have reviewed the rezoning request and are prepared to give rezoning approval to the portion of the project that is located in their jurisdiction. Staff is assuming that all permitting and inspections will be handled based on the jurisdiction the improvement is located in (i.e. Morgan County will permit and inspect only those structures located in Morgan County). Any areas where there may be a conflict in standards, such as road design, stormwater detention standards, right-of-ways, etc, Morgan County shall assume that their requirements shall govern the portions of the property included in Morgan County unless otherwise approved in a development agreement by the Morgan County and Putnam County Board of Commissioners.

6. **Concept Plan.** The staff will recommend that rezoning of the project be tied to the concept plan and application materials submitted at the time of the rezoning application. Any changes to the concept plan, including but not limited to density, phasing of the project, or layout of internal amenities must be approved by the Morgan County Board of Commissioners for the portion of the project located in our jurisdiction as well as all project entrances.
7. **Viewshed Protection.** Staff has expressed concerns regarding the impact that this project will have on the rural vistas in proximity to this site. Additionally, property owners have expressed concerns that the areas designated as “Lake Club” and “Neighborhood 16” will be visible from the right of way along Cedar Grove Road. Staff expect the proposed development agreement to address mitigation of the visual impact to these areas along Cedar Grove Road and Kingston Road.
8. **Agricultural Operations.** Staff has expressed concerns regarding the impact that this project will have on the existing agricultural operations in proximity to this site. Specifically, though this site has limited frontage on Lake Oconee and it proposes to emulate a pattern of resort-style development seen in other counties, it is located in an area that has historically been largely agrarian in nature. The parcel borders land that is currently utilized for the pasturing of cattle, as well as confined animal feeding structures for poultry along Kingston Road. Staff propose that an agricultural use notice and waiver, similar to the language proposed under Article 5 of the Morgan County Zoning Ordinance, be included in the development agreement, and a mechanism established to include said language on all real estate transfers internal to the project.
9. **Historic and Cultural Resources.** The Cultural Resource Assessment submitted in conjunction with this previous application for rezoning identified 26 documented archaeological sites and 2 sites of architectural significance in proximity to this project. Staff expects the developers to fully cooperate in mitigating any effects on these resources, as well as documenting and mitigating the impacts on any additional resources discovered as the project develops as a condition of the proposed development agreement.
10. **Lake Club Site and Improvements to Lake Oconee.** Staff has consistently reiterated our concerns that the project site is located on a small part of Lake Oconee that has limited frontage and shallow depth. Specifically, we have repeated our concerns that the portion of the lake where this project is located may have barely two-feet of water, and is located in a swampy cove. We have expressed concerns that development should have limited impact on the natural environment of this cove, and we have also suggested that the limited access to Lake Oconee may result in a considerable amount of recreational use and boat traffic in an area that is ill-suited for it. The developers have indicated that they have negotiated permits with the Army Corps of Engineers, Georgia EPD, and Georgia Power to reengineer the lake around their property, including dredging and constructing new dams to mitigate swampy areas. Staff will require that written proof of any such permits or agreements be included in the proposed development agreement.
11. **Solid Waste Management.** Presently Morgan County does not have a county-wide system of curb-side garbage collection. Individuals are responsible for transporting waste to dumpsters, and county staff hauls solid waste from the dumpsters to a transfer station. The developer has indicated that they plan to have curb-side garbage collection internal to their project which will be provided by a private collection service. The method of solid waste disposal needs to be specified in the proposed development agreement. Additionally, the county may request that a dumpster site be constructed at the entrance on Kingston Road to address additional concerns of residents in the area.
12. **Housing.** Staff has expressed two primary concerns to the developers of this project in regard to housing needs in the county.
 - a. Morgan County has articulated a need to provide housing that meets the needs of a variety of incomes. In recent months, emphasis has been placed creating housing opportunities for workforce families. The information submitted at the time of the DRI Review does not suggest whether we can expect a workforce housing component to be included in this project. Given the large number of residential units proposed, as well as the diversity of housing types proposed, Staff would like the developer to elucidate if their proposal would include housing targeted at the median household income for Morgan County families.
 - b. Morgan County has expressed concern that the overall plan of the project is untenable in this area, and that elements of the concept plan may not be realized, thus stranding the residents of the

community and Morgan County with a half-built project. Staff has repeatedly informed the developer that their projected build out date of 2015 to be untenable. To ameliorate these concerns, as well as others expressed in regard to impacts on transportation, school systems, and emergency services, staff may recommend that the project be phased, and that the number of building permits be limited to what we think we can reasonably accommodate.

As always, staff is available to discuss or elaborate upon any of these concerns.

Respectfully submitted.