

NWGRC

NORTHWEST GEORGIA REGIONAL COMMISSION

A Region With A Bright Future



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Dalton Office: 503 West Waugh Street, Dalton, Georgia 30720 Phone (706) 272-2300 Fax (706) 272-2253

To: Local Governments, State Agencies, and Interested Parties

From: Boyd Austin, Executive Director

Date: September 20, 2022

Subject: Report on DRI 3599 Canebreak West, Dallas

The Northwest Georgia Regional Commission has conducted a Development of Regional Impact review for DRI 3599, Canebreak West, Dallas Georgia, and offers this report with comments received from affected parties, including Georgia DNR Floodplain Unit, USDA NRCS, Georgia DOT Aviation, Paulding County Schools, and Carroll County. One 30-day extension was requested by City of Dallas with Paulding County and NWGRC concurring. In making local planning decisions, the City of Dallas is encouraged to review the comments received.

Georgia Regional Transportation Authority is conducting its review. The Paulding County Department of Transportation and City of Dallas provided comments to GRTA on the Transportation Study provided by A & R Engineering. GRTA provided a Staff Recommendations Report on 7/27/22. The Transportation Study was revised most recently on 3/10/22. Paulding County submitted further comments on the Traffic Impact Study which were forwarded to GRTA, and are included here as well.

Georgia DNR Floodplain Unit comments, "From inspection of the effective Flood Insurance Rate Maps (FIRMs) developed by the Federal Emergency Management Agency (FEMA), the proposed structure is located outside of the Special Flood Hazard Area (SFHA), in Zone X (unshaded), an area of low flood risk. A Floodplain Snapshot Map showing the designated floodplain impacts in the vicinity of the project location, accompanied by the relevant extract of FEMA's FIRMs are attached." Please see full comments.

USDA NRCS comments, "...this project does not involve soil map units rated as prime, unique, or statewide importance and is exempt from this [Land Evaluation and Site] assessment. We have reviewed our records and determined that **there are [watershed dam] structures downstream and/or in the vicinity of the proposed project** that could be affected by these activities. We have reviewed our records and have determined that there are no such [wetland or farm/ranch] easements downstream or

Regional Planning Economic Development Area Agency on Aging Workforce Investment Program

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Auxiliary Aids / Services Available Upon Request to Individuals with Disabilities*

in the near vicinity of the proposed project that could be affected by these activities.” Please see full comments.

GDOT Aviation comments, “While is development is within 5 miles of the Paulding Northwest Atlanta Airport, it is below runway elevation, and outside of the approach and Runway Protection Zone. This development will have not impact to the airport.” Please see full comments.

Paulding County Schools provided the following comments:

“As a community, Paulding County is experiencing marked residential development growth that impacts several domains of infrastructure and services. This application points to several areas, including water, wastewater, solid waste, stormwater, and transportation. What has not been considered is the impact on the Paulding County School District which includes funding, enrollment, and services for the additional student yield which will be an estimated 426+ students for these additional 670 homes.

As one of the fastest growing school districts, our district budget is impacted currently by an imbalance of residential to commercial development. Only 17% of our tax digest is non-residential whereas other large districts average 38% of the tax digest as non-residential. This imbalance requires us to rely on other sources such as state funding, federal funding, and grant funding which are highly susceptible to changes in funding mechanisms. We have experienced austerity cuts in state funding, and we have atypical percentages of federal funding such as Title I and Free/Reduced Lunch compared to other low wealth districts.

PCSD (Paulding County School District) is one of the fastest growing school districts in the state. Our 3-year average annual growth rate for FY17-FY21 was 1.3%, compared to other large district rates of -0.5%. FY23 enrollment is projected to grow by 2.8% or 840 students, which is the size of an average elementary or middle school in one year. Large residential unit projects, such as this one, are substantially more difficult in Paulding where we have a larger number of school-aged children per household, 10.7% more persons-per-household than the state average, specifically school-aged children.

This demand means school enrollment stretches beyond capacity until new seats become available. We anticipate more than 14 of our current schools to experience critical operational and instructional impacts due to overcrowding within the next few years, for which new construction is required to combat. New construction in this current market is difficult and expensive. In addition, the value of the new residential construction contributes to this burden as the property taxes, typical of Paulding’s new residential construction, do not generate or support the cost of constructing additional instructional units. And, due to substantial debt from past growth spurts, our district’s available capital budget is lessened by debt costs.

Finally, PCSD, like other industries, is currently burdened by a shortage of labor, in teaching staff, but more specifically in transportation, cafeteria and custodial services. The increased enrollment requires additional instructional and support staff which simply are not available. Therefore, even in attendance zones, such as this proposed development, where classes are available, the increased number of critical service staff is not. This would require us to stress and stretch what is already a struggle in providing essential services. Most recently our district had to implement mitigations such as decreasing the number of attendance days for our high school students due to staffing issues.

Due to these funding, enrollment, and service impacts, we ask that all approving agencies, local and state, scrutinize critically the approval of such residential development projects just as rigidly as you do for our community's infrastructure."

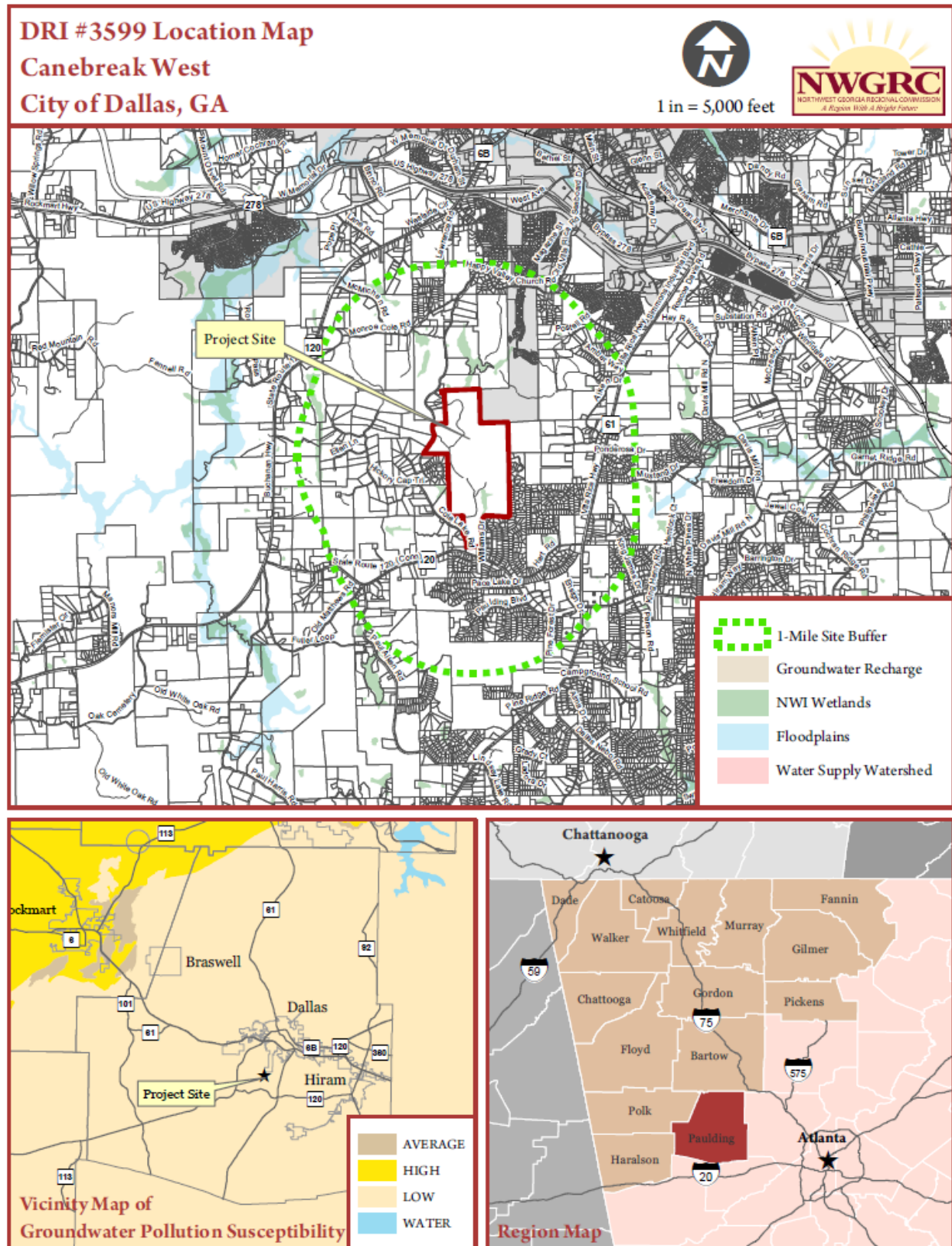
Carroll County commented, "Carroll County does not anticipate any impact to current infrastructure."

Consistency with Comprehensive Plan and Service Delivery Strategy: This area is shown on the 2017 Joint Comprehensive Plan Paulding County Future Development Map as Community Residential, and the area above it in Dallas as Residential. City of Dallas is the provider of sewer service in this area according to the 2019 Service Delivery Strategy, and Paulding County is the provider of water service.

Consistency with 2019 Northwest Georgia Regional Plan: The area is shown as Developing on the Northwest Georgia Projected 2040 Regional Land Use Map, that is, an area where infrastructure particularly sewer is anticipated to be built out to support denser development.

Consistency with 2012 Regionally Important Resources Plan: The only Regionally Important Resources identified for this area is Lane Creek, which is a tributary to Pumpkinvine Creek to the west of this site, and one small lake.

Location Map and Site Plan



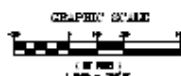
- 7.5 ACRE PROPERTY INCLUDING:**
- **DISCERNER COMPLETED 2 STORY CLUBHOUSE WITH LOUNGE AREA, BANQUET ROOM WITH KITCHEN, GYM AND GAME ROOM**
 - **LARGE POOL WITH OVERSIZED SUNDECK**
 - **ZERO TO FIVE YEAR OLD PLAYGROUND**
 - **SLASH FOUNTAIN FOR KIDS**
 - **2 LIGHTED REGULATION TENNIS COURTS**
 - **11 COURT PICKLE BALL TOURNAMENT FACILITY WITH COVERED VIEWING PAVILION**
 - **BEACH VILLY BALL COURT**
 - **FULL SIZE BASKETBALL COURT**
 - **SPACIOUS CHILDREN'S PLAY GROUND**
 - **FENCED PARK FOR BOTH LARGE AND SMALL DOGS**
 - **NATURE TRAIL SYSTEM**
 - **100' X 100' FENCED WALKER PARKING**
 - **FENCED PARK FOR BOTH LARGE AND SMALL DOGS**

APPLICANTS:
DAVID PEARSON COMMUNITIES, INC.
2000 FIRST DR., STE. 400
MARIETTA, GA. 30062
CONTACT: DOUG PATTON, CHIEF
770-294-1504

OWNER
S J TWILLEY
1406 SENECA DR.
DOUGLASVILLE, GA, 30134
DB, 301, PG. 613
CONTACT J TWILLEY

SITE NOTES:
PROPOSED ONE-STORE FAMILY RESIDENTIAL
CONVERT 2000S - PC
PROPOSED ONE-STORE, 2000S - 11-STEP PLANNED RESIDENTIAL DETECT
TOTAL FLOOR AREA - 2000 SQ. FT.
TOTAL LOTS - 570
DENSITY - 2.50 U/L
MINIMUM LOT SIZE - 6000 SQ. FT.
MINIMUM LOT FRONTAGE - 50 FT.
MINIMUM LOT WIDTH AT SETBACK - 50 FT.

SETBACKS
FRONT - 25'
SIDE - 10' BETWEEN BLDGS.
11-FOOT SIDE - 15'
REAR INTERIOR - 20'
REAR EXTERIOR - 25'



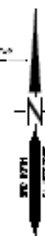
Year	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048	2049	2050	2051	2052	2053	2054	2055	2056	2057	2058	2059	2060	2061	2062	2063	2064	2065	2066	2067	2068	2069	2070	2071	2072	2073	2074	2075	2076	2077	2078	2079	2080	2081	2082	2083	2084	2085	2086	2087	2088	2089	2090	2091	2092	2093	2094	2095	2096	2097	2098	2099
1	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048	2049	2050	2051	2052	2053	2054	2055	2056	2057	2058	2059	2060	2061	2062	2063	2064	2065	2066	2067	2068	2069	2070	2071	2072	2073	2074	2075	2076	2077	2078	2079	2080	2081	2082	2083	2084	2085	2086	2087	2088	2089	2090	2091	2092	2093	2094	2095	2096	2097	2098	2099



LOCATION MAP - ITS

BOUNDARY SURVEY SHOWN ON THIS PLAN WAS CONDUCTED BY
 GEORGETOWN SURVEYING AND LAND PLANNING, INC.
 GEORGETOWN, N.C. 28426
 FILED FOR RECORD JAN. 2002

TOPOGRA-PHIC INFORMATION NOT TO BE USED FOR PLANNING, DESIGN, OR
 CONSTRUCTION PURPOSES



MEMPHIS, Tenn. (UPI) — A 1960s-era
 Memphis, Tenn. (UPI) — A 1960s-era

WATERPOINT

DAVID PEARSON COMMUNITIES, INC.

© 2004 Blackwell Publishing Ltd, *Journal of Internal Medicine* 255: 105–112

Plant to: MOF/HCC		Date: 04/08/21	
Plant to: DP		Plant to: CONCERT	
Plant to: COLE-LANE		Plant to: DP	
NO	DATE	REASON DESCRIPTION	BY
1			

COMMENTS RECEIVED


Richard E. Dunn, Director
**Watershed Protection Branch
Nonpoint Source Program
Floodplain Unit**

 2 Martin Luther King, Jr. Drive
Suite 1152, East Tower
Atlanta, Georgia 30334

FLOODPLAIN ENCROACHMENT REVIEW

 To: Julianne Meadows
Email: jmeadows@nwgrc.org

PROJECT NAME:	DRI 3599 Canebreak West	COUNTY:	Paulding	COMMUNITY:	Paulding County
LOCATION:	The project is located on 318.64 acres of undeveloped timbered land, with a proposed single family residential subdivision to the north and a small extant subdivision to the east, with forested land and other small subdivisions or single homes to the south and west.				
BRIEF PROJECT DESCRIPTION:	The Northwest Georgia Regional Commission is requesting comments on DRI 3599, Canebreak West, a residential development in northcentral Paulding County. The proposed project would develop 670 single-family detached residential units on Cole Lake Road.				
APPLICANT:	Northwest Georgia Regional Commission	APPLICATION DATED:	07/25/2022	APPLICATION RECEIVED:	07/26/2022
SFHA* ENCROACHMENT:	No	EFFECTIVE PANEL(S):	13223C0138D (Effective Date: 06/07/2019)	FLOOD RISK ZONE(S):	X
www.georgiadfirm.com		PRELIMINARY PANEL(S):	N/A	FLOOD RISK ZONE(S):	N/A
https://msc.fema.gov/portal		LETTER OF MAP CHANGE (S):	N/A	FLOOD RISK ZONE(S):	N/A
WATERSHED(S):	Etowah (8 Digit HUC: 03150104)	COMMUNITY CONTACT:	<u>Paulding County Engineer</u> Address: 240 Constitution Boulevard, Dallas, GA 30132 Tel: (770) 443-7571 Ext:22		
COMMENTS:	From inspection of the effective Flood Insurance Rate Maps (FIRMs) developed by the Federal Emergency Management Agency (FEMA), the proposed structure is located outside of the Special Flood Hazard Area (SFHA), in Zone X (unshaded), an area of low flood risk. A Floodplain Snapshot Map showing the designated floodplain impacts in the vicinity of the project location, accompanied by the relevant extract of FEMA's FIRMs are attached. Please note that this response addresses issues related specifically to the possible effects of the project on floodplains in the area, it does not override or supersede any State or local procedural substantive provisions which may apply to floodplain management requirements associated with amendments to State or local floodplain zoning ordinances, maps, or State or local procedures adopted under the National Flood Insurance Program.				
Prepared By:	Olivia Martin	Telephone:	(470) 845-1108	Email:	Olivia.Martin@dnr.ga.gov
Signature:	<i>Olivia Ts. Martin</i>			Date:	07/27/2022

*Special Flood Hazard Area – Area Inundated by the 1% Annual Chance Flood (Often Referred to as the 100-year Flood)

2113-2147 Cole Lake Rd, Dallas, Georgia,
30157

GEORGIA FLOOD MAP PROGRAM

Property Flood Risk:
Low Risk



Location Information

Panel: 13223C0138D
Watershed: Etowah
County: PAULDING
Community ID: 13223C
Map Status: EFFECTIVE

Flood Depths shown on this report are derived from FEMA FloodMap products and are rounded to the nearest foot of a foot. These depths are calculated from hydrologic modeling and represent the best available data. Only areas within a FloodMap product boundary will have the data available. Please check back if your area is not currently available. For more information, please visit the FEMA Map Service Center at <https://www.fema.gov/map-service-center>

Nature Doesn't Read Flood Maps

Every year, people don't understand just how near the floodplain can be. There is a greater than 20% chance that a non-flooded area in the above will be flooded during a 100-year flood event.

The chance that a major fire will occur during the 100-year flood is also 10% to 15%.

FOR MORE INFORMATION VISIT: PLEASE VISIT: [floodsmart.gov](https://www.floodsmart.gov)

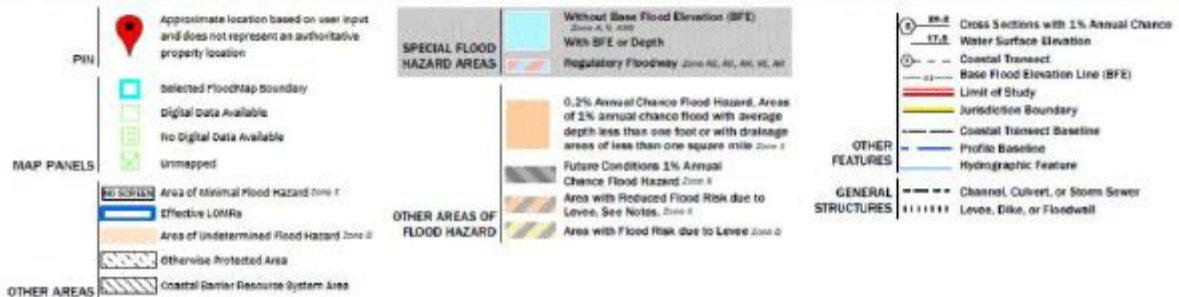
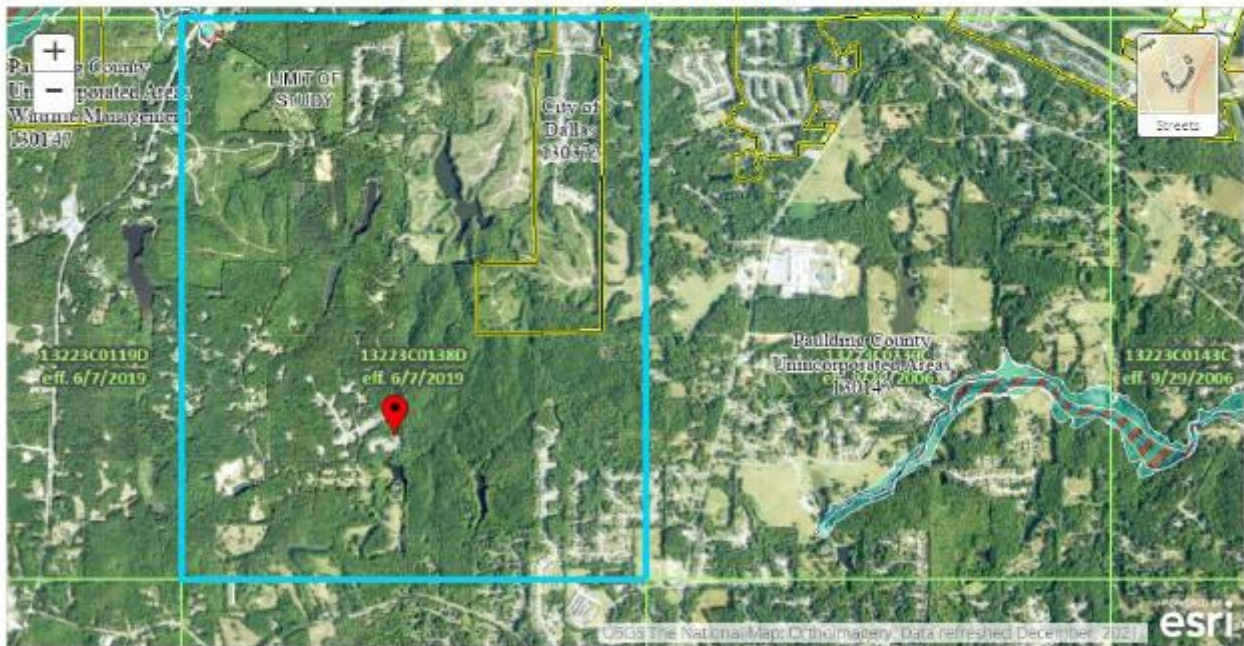


Legend with Flood Zone Designations

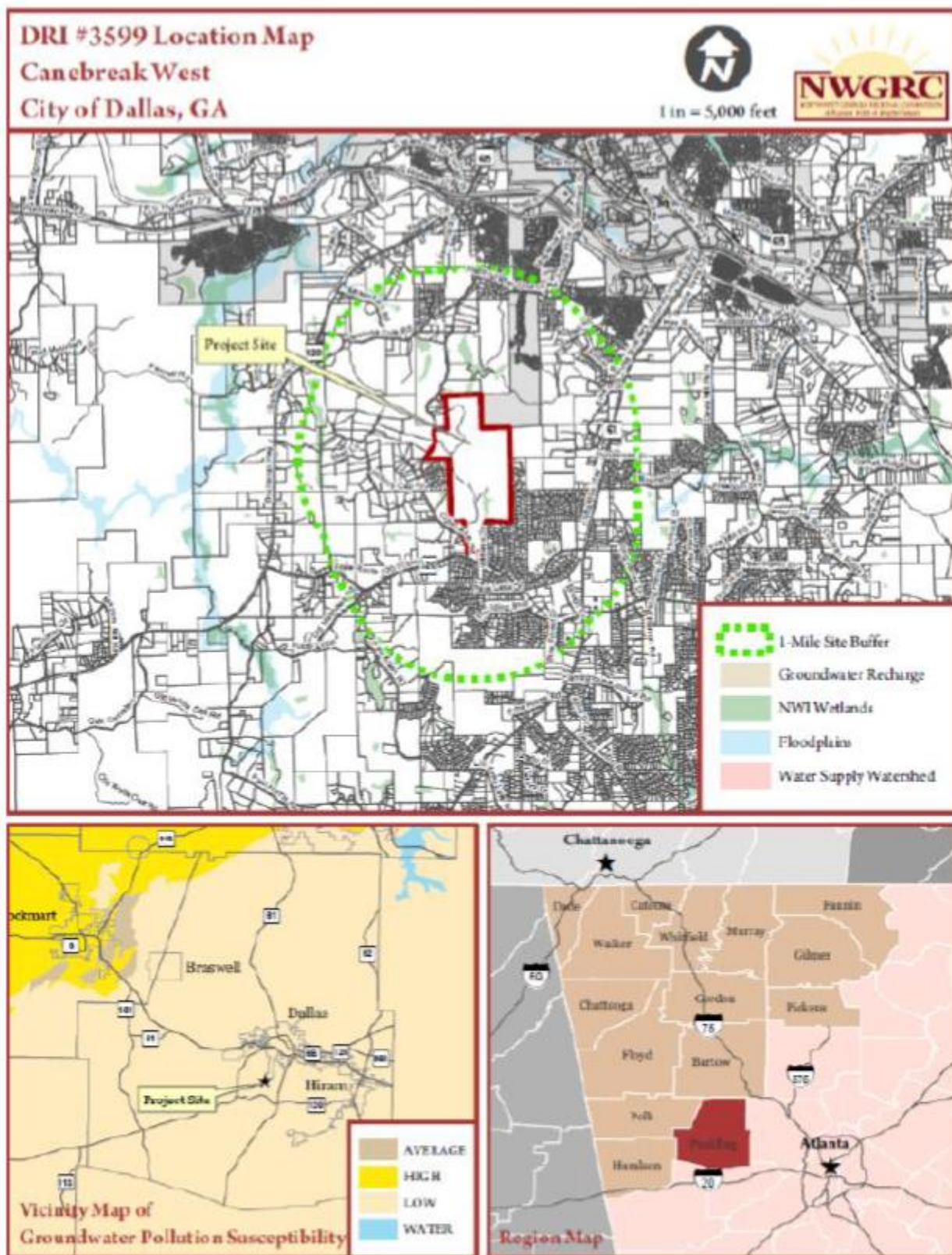
- Flood Control Structures
- Base Flood Elevation
- Cross Sections
- Coastal Truncates
- PWM Flood Index
- 1% Flood - Floodway (High Risk)
- 1% Flood - Zone A, AH, or AO (High Risk)
- 1% Flood - Zone X (Shaded) (Moderate Risk)
- 0.2% Flood - X (Shaded) (Moderate Risk)
- Area of Undetermined Flood Hazard
- 1% Flood - Zone VE (High Risk)
- Area Not Included
- Letters of Map Revision
- Coastal Barrier Resource System Area
- Limit of Moderate Wave Action
- Floodway Decrease
- Floodway Increase
- 100-Year Flood Zone Increase
- 100-Year Flood Zone Decrease
- Zone Change

Disclaimer: This data is not to be used to determine any base flood elevations or flood zone designations for NFIP (National Flood Insurance Program) purposes. For NFIP flood insurance and regulatory purposes, please refer to the published effective FIRM (Flood Insurance Rate Map) for your area of concern. Values displayed for Current Flood Zone, Preliminary Flood Zone, Flood Zone Change, Tide, and Probability of Flooding over a 30-year period based on water of last season, not extent of drydown(s).

Floodplain Snapshot for the proposed project area



FEMA FIRM Extract



Project Location Map

DRI 3599 COMMENT FORM

Description of DRI project:

The Northwest Georgia Regional Commission is requesting comments on Development of Regional Impact DRI 3599, ~~Canebreak West~~, residential development in northcentral Paulding County. The proposed project would develop 670 single-family detached residential units on Cole Lake Road. Please send comments to Julianne Meadows, jmeadows@nwgrc.org, within the following 15-day period: Tuesday July 26th, 2022- Tuesday August 9, 2022.

Comments

~~Name:~~ **Alan Hood**

~~Date:~~ **8/8/2022**

~~Organization:~~ **GDOT Aviation Programs**

Comments:

While is development is within 5 miles of the Paulding Northwest Atlanta Airport, it is below runway elevation, and outside of the approach and Runway Protection Zone. This development will have not impact to the airport.

Thank you for the opportunity to comment.

Reviewing Regional Commission: Northwest Georgia

Contact Person: Julianne Meadows

Address: P. O. Box 1798, Rome, Georgia 30162-1798

Phone: (706) 295-6485 **Fax:** (706) 295-6665

E-mail: jmeadows@nwgrc.org

DRI 3599 COMMENT FORM**Description of DRI project:**

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Comments

Name: Susan Browning, Associate Superintendent

Date: August 8, 2022

Organization: Paulding County School District

Comments:

As a community, Paulding County is experiencing marked residential development growth that impacts several domains of infrastructure and services. This application points to several areas, including water, wastewater, solid waste, stormwater, and transportation. What has not been considered is the impact on the Paulding County School District which includes funding, enrollment, and services for the additional student yield which will be an estimated 426+ students for these additional 670 homes.

As one of the fastest growing school districts, our district budget is impacted currently by an imbalance of residential to commercial development. Only 17% of our tax digest is non-residential whereas other large districts average 38% of the tax digest as non-residential. This imbalance requires us to rely on other sources such as state funding, federal funding, and grant funding which are highly susceptible to changes in funding mechanisms. We have experienced austerity cuts in state funding, and we have atypical percentages of federal funding such as Title I and Free/Reduced Lunch compared to other low wealth districts.

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Finally, PCSD, like other industries, is currently burdened by a shortage of labor, in teaching staff, but more specifically in transportation, cafeteria and custodial services. The increased enrollment requires additional instructional and support staff which simply are not available. Therefore, even in attendance zones, such as this proposed development, where classes are available, the increased number of critical service staff is not. This would require us to stress and stretch what is already a struggle in providing essential services. Most

DRI 3599 Canebreak West, Dallas

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Due to these funding, enrollment, and service impacts, we ask that all approving agencies, local and state, scrutinize critically the approval of such residential development projects just as rigidly as you do for our community's infrastructure.

Reviewing Regional Commission: Northwest Georgia

Contact Person: Julianne Meadows

Address: P. O. Box 1798, Rome, Georgia 30162-1798

Phone: (706) 295-6485 **Fax:** (706) 295-6665

E-mail : jmeadows@nwgrc.org



United States Department of Agriculture

August 30, 2022

Boyd Austin, Executive Director
Northwest Georgia Regional Commission
P.O. Box 1798
Rome, Georgia 30162

Re: Development Regional Impact 3599 Request for Canebreak West, a Residential Development, Paulding County

Dear Mr. Frasier:

This letter is in reference to your request for information on the possible impacts the proposed residential development project may have on land use, conservation, water quality and other general environmental concerns that may be of interest to our agency. The following outlines our concerns with the proposed project with regards to farmland protection, and Natural Resources Conservation Service (NRCS) watershed dams and project easements.

Farmland Protection

The Farmland Protection Policy Act (FPPA) is intended to minimize the impact federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses. Projects are subject to FPPA requirements if they may irreversibly convert farmland (directly or indirectly) to nonagricultural use and are completed by a federal agency or with assistance from a federal agency. For the purpose of FPPA, farmland includes areas located within soil map units rated as prime farmland, unique farmland, and land of statewide or local importance. Farmland subject to FPPA requirements does not have to be currently used for cropland. It can be forest land, pastureland, cropland, or other land uses, but not water or urban built-up land. It should be noted that the FPPA does not authorize the Federal Government to regulate the use of private or nonfederal land or, in any way, affect the property rights of owners.

NRCS uses a Land Evaluation and Site Assessment (LESA) system to establish a farmland conversion impact rating score on proposed sites of federally funded and assisted projects. This score is used as an indicator for the project sponsor to consider alternative sites if the potential adverse impacts on the farmland exceed the recommended allowable level. It is our understanding that the proposed project involves federal funds or assistance, and thus could be subject to this assessment. Please note, FPPA considers indirect as well as direct conversion. The acres directly converted will be the project area. Areas planned for direct or indirect conversion should be indicated on plans or maps included in the packet of materials for the project. **However, this project does not involve soil map units rated as prime, unique, or statewide importance and is thus exempt from this assessment. You need take no further action for FPPA purposes.**

Natural Resources Conservation Service
Georgia State Office
355 East Hancock Avenue - Athens, GA - 30601-2775
Voice: 706-546-2272 Fax: 855-417-8490

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Austin

Page 2

NRCS Watershed Dams

More than 50 years ago, the U.S. Department of Agriculture was authorized by Congress to help local communities with flood control and watershed protection through the Watershed Program (PL-534 Flood Control Act of 1944 and PL-566 Watershed Protection and Flood Prevention Act). As a result, local communities, with NRCS assistance, have constructed over 11,000 dams in 47 states since 1948. These dams were originally constructed for protection of farmlands from flooding impacts. In 2000, PL-566 was amended to provide NRCS authorization to assist communities with rehabilitation of their aging dams. The legislation authorizes NRCS to work with local communities and watershed project sponsors to address public health and safety concerns and potential environmental impacts of aging dams.

We have reviewed our records and have determined that there are structures downstream and/or in the vicinity of the proposed project that could be affected by these activities.

NRCS Easements

NRCS easements relate to our Wetland Reserve Program and the Farm and Ranchland Protection Program. **We have reviewed our records and have determined that there are no such easements downstream or in the near vicinity of the proposed project that could be affected by these activities.**

NRCS appreciates this opportunity to comment. If you have questions or need any additional information, please contact me at (706) 546-2244 or dan.wallace@usda.gov.

Sincerely,

DANIEL WALLACE Digitally signed by DANIEL WALLACE
Date: 2022.08.30 15:42:29 -04'00'

DANIEL F. WALLACE
STATE RESOURCE INVENTORY COORDINATOR

cc: Mike Watson, Assistant State Conservationist (FO), NRCS, Griffin, GA
Shemekia Mosley, District Conservationist, NRCS, Marietta, GA
Michael Henderson, Resource Soil Scientist, NRCS, Griffin, GA
Nelson Velazquez Gotay, Soil Scientist, NRCS, Athens, GA
Julianne Meadows, NWGRC

Julianne Meadows

From: Janet Hyde <jhyde@carrollcountyga.com>
Sent: Monday, August 8, 2022 4:50 PM
To: Julianne Meadows
Cc: Ben Skipper
Subject: RE: DRI 3599 Canebreak West Request for Review and Comment

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Carroll County does not anticipate any impact to current infrastructure.

Sincerely,

Janet Hyde, County Planner
Carroll County Community Development
423 College Street
Carrollton, GA 30117
(770)830-5861 Ext 2051
<http://www.carrollcountyga.com/158/Community-Development-Department>



NOTE: Zoning and variance cases are not guaranteed. A development discussion is not an assurance of issuance of a building permit, business license (OTC), or assurance of possible zoning change. The plan review process requires review and acceptance by multiple reviewers before approval.

From: Julianne Meadows <jmeadows@nwgrc.org>
Sent: Tuesday, July 26, 2022 12:25 PM
To: chrisg.robinson@paulding.gov; ann.lippmann@paulding.gov; ksmith@dallas-ga.gov; pkilgore@dallas-ga.gov; jpalmer@hiram-ga.gov; yaya13.hw@gmail.com; cityofbraswell@comcast.net; osborner@bartowcountyga.gov; Jason.Gaines@cobbcounty.org; David.LWebb@cobbcounty.org; rroberts@co.douglas.ga.us; Ben Skipper <bskipper@carrollcountyga.com>; Janet Hyde <jhyde@carrollcountyga.com>; Alison.palmer@haralsoncountyga.gov; celliott@polkga.org; DShockey@atlantaregional.org; asmith@atlantaregional.com; pjarrell@threeriversrc.com; edavis1@ATLtransit.ga.gov; dweir@ATLtransit.ga.gov; Boyd Austin <baustin@nwgrc.org>; Barbara Snead <bsnead@nwgrc.org>; Ethan Calhoun <ecalhoun@nwgrc.org>; Joseph Davidson <jdavidson@nwgrc.org>; Julianne Meadows <jmeadows@nwgrc.org>; Jon.West@dca.ga.gov; zane.grennell@dca.ga.gov; patrick.vickers <patrick.vickers@dca.ga.gov>; cbarry@dot.ga.gov; DAcre@dot.ga.gov; aviationprograms@dot.ga.gov; ahood@dot.ga.gov; acarroll@gefa.ga.gov; conserve@mctga.org; gigi.steele@dnr.ga.gov; haydn.blaize@dnr.ga.gov; Dan.Wallace@ga.usda.gov; jesse@coosa.org; kowens@tnc.org; anakela.escobar@dnr.ga.gov
Subject: DRI 3599 Canebreak West Request for Review and Comment

Canebreak West Revised Study Comments

1. The “Recommended Site Mitigation Improvements” on pages E-4 and 48 of the revised study does not include the recommendations for a deceleration lane for Site Driveway 1 and for a left turn lane for Site Driveway 2 that were listed in the previous traffic study. However, the “Auxiliary Lane Analysis” on page 40 of the revised study states that the warrants for those lanes are met at both access points.
2. Why is there no mention about a portion of West Avenue being a one way roadway between Trailside Drive and 361 Westside Avenue on page 7 where Westside Avenue is described?
3. How did the level of service delay numbers change for “No-Build” intersection operations in the future in Table 6 for the revised study versus the original study? It appears that intersections 2, 10, 13, 14 have changed.
4. Can you explain specifically how this development is consistent with the vision and goals assigned to the City of Dallas at the bottom of page 22 “to coordinate infrastructure expansion with land use to encourage the expansion of infrastructure networks that are guided by the future development map”? It appears that all of the physical roadway improvements proposed by the traffic study are either inside the development or at the entrances to the development.
5. What basis does the study use for assuming the SR 61 widening project (PI # 0013702) will be complete before the development is finished in 2026?
6. Were any 48 hour tube counts done to determine the average daily traffic (ADT) on any of the study roads? It does not appear that any ADT counts were included in the appendix.
7. How does Cole Lake Road at Buchanan Highway (SR 120) operate at an acceptable level of service in the future improved condition with the development built? The Synchro analysis found on page 251 of the study in the appendix shows that there will be 25 vehicles stacked up on the northbound Buchanan Highway (SR 120) approach to Jimmy Campbell Pkwy (US 278). If you assume 25 feet for each vehicle and the space between vehicles then that would equate to a queue length of 625 feet which is past Cole Lake Road at Buchanan Highway (SR 120). If you have some heavy trucks in the queue aforementioned on the northbound Buchanan Highway (SR 120) approach to Jimmy Campbell Pkwy (US 278) then the queue will be longer than 625 feet. This is one issue with relying on just a macro simulation model such as Synchro alone where blocking and queuing issues are identified. The Synchro macro simulation model has well documented limitations when it comes to measuring the full impact of queuing and blocking. Recommend a microsimulation analysis such as Sim Traffic in all areas within the study network where Synchro indicates that queueing from one study intersection may block another study intersection.
8. How were the trips generated distributed between the two access points for the development? What were the percent split between the two and what was the percentages based on?
9. Were any direct observations made of how intersections operate now during either the am or pm peak hours that are listed as currently having approaches operate at level of service D or E or any of the intersections that

have questioned previously such as Cole Lake Road at Buchanan Highway or Henry Y Holland Drive at Nathan Dean Boulevard?

10. Section 3.2.3.4 of the GRTA Review Procedures requires at a minimum that the 4 hour signal warrants analysis be done per MUTCD standards where a traffic signal is suggested to mitigate the LOS on a failing approach. It does not appear that a signal warrants analysis was done for the intersection of Nathan Dean Boulevard and Henry Y Holland Drive as prescribed in the GRTA standards.
11. How were the signal timing inputs used in the Synchro model for signalized intersections determined? There appears to be differences in the signal timings input into the Synchro model for Existing and No-Build Conditions versus what is actually programmed in the controllers at the existing signalized intersections in the study network. Section 3.2.3.1 of the GRTA Review Procedures requires that no changes shall be made to traffic signal timing including sequences, splits, offsets, phases, and cycles between the existing and no-build conditions unless modifications are required to accurately model a programmed transportation project. This can have an impact on 95th percentile queue lengths, with the possibility of queue lengths exceeding available storage. There appears to be no evidence presented that the SR 61 widening project (P.I. #0013702) will be complete before 2026.
12. Section 3.2.2.4 of the GRTA Review Procedures requires that an improvements analysis be done to improve any approach that does not meet the defined LOS standard (LOS D) in the No Build Condition. What improvement analysis was done for the failing northbound and southbound approaches to the intersection of Nathan Dean Boulevard (SR 61) at Merchants Drive (SR 6 Business)? Which approach or approach direction is being referred to when it is stated on page 36 of the study to “Convert the existing shared through left turn to a dual left with shared through movement in one lane”? How do you just convert one existing shared through left turn lane into two lanes that provides dual left with shared through movements?
13. It appears that there were additional trips placed on the eastbound Scoggins Road approach to SR 61 comparing the trips shown for the Future Build Condition in the revised study versus the original study. Why are the additional trips shown as being eastbound through trips only during the peak hours? What is the distribution for that eastbound approach by movement?