

Georgia Department of Natural Resources
Environmental Protection Division

Watershed Protection Branch
4220 International Parkway, Suite 101, Atlanta, Georgia 30354
Linda MacGregor, P.E., Branch Chief
404/675-6232

Reply To:
NonPoint Source Program
404/675-6240

March 15, 2013

Dr. Lindsay Holliday
360 Spring St.
Macon, Georgia 31201

Re: Request for Stream Buffer Variance under
Provisions of O.C.G.A. 12-7-6(b)(15)
Georgia Academy For the Blind Improvements
City of Macon

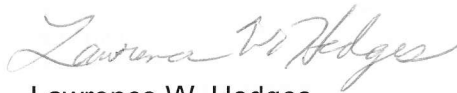
Dear Dr. Holliday:

The Georgia Environmental Protection Division (EPD) received your comments regarding the proposed permanent impacts relating to the proposed improvements at the Georgia School for the Blind in Macon, Georgia. EPD requires that the applicant respond to the comments before continuing the stream buffer variance process. Therefore, your comments were forwarded to the applicant as well as their consultant, Breedlove Land Planning, Inc. On behalf of the applicant, Mr. Reece Parker with Breedlove Land Planning, Inc. has provided responses to your concerns and they are enclosed. In addition, your supplemental comments that were submitted after the 30-day comment period had closed were forwarded to the applicant who has responded to those comments and they are also enclosed. As per your comments, Breedlove Land Planning has revised the plan to indicate no removal of the invasive species that are present downstream of the proposed impacts. The planting of native riparian species that was originally proposed as partial mitigation will not be implemented. In addition, a roof gutter or splash pad will be installed on the east side of the Health Services Building to address the minor erosion you identified as occurring in that area.

Due to the fact that the applicant met all of the applicable requirements, EPD granted the requested stream buffer variance on March 14, 2013 and a copy is enclosed.

If you have any questions, please contact Peggy Chambers, Erosion and Sedimentation Control Unit, at (404) 675-6240.

Sincerely,



Lawrence W. Hedges
Program Manager
NonPoint Source Program

LWH:pc
Attachment

cc: Raquel Clement
Danny Tavakol
Reece Parker
File: BV-011-12-03

Georgia Department of Natural Resources
Environmental Protection Division

2 Martin Luther King Jr., Dr., Suite 1152 Atlanta, Georgia 30334
Judson H. Turner, Director
(404) 656-4713

March 14, 2013

Ms. Raquel Clement
Georgia State Financing and Investment Commission
270 Washington St.
Second Floor
Atlanta, Georgia 30334

Re: Request for Variance under
Provisions of O.C.G.A. 12-7-6(b)(15)
Georgia Academy for the Blind Improvements
City of Macon

Dear Ms. Clement:

Your stream buffer variance request for the above referenced project has been reviewed by the Georgia Environmental Protection Division's Watershed Protection Branch. The review was conducted to consider the potential impact of the proposed project's encroachment on State waters within the context of the Georgia Erosion and Sedimentation Act. Pursuant to DNR Rule 391-3-7.05(2)(h), authorization is hereby granted to encroach within the 25-foot buffer adjacent to State waters for the above referenced project subject to the following conditions:

1. As per your application dated September 7, 2012 and the revised plans received January 30, 2013;
2. All graded slopes 3:1 or greater must be hydroseeded and covered with Georgia DOT approved wood fiber matting or coconut fiber matting. If not hydroseeded, Georgia DOT approved matting that has been incorporated with seed and fertilizer must be used. All slopes must be properly protected until a permanent vegetative stand is established;
3. The amount of land cleared during construction must be kept to a minimum;
4. All disturbed areas must be seeded, fertilized and mulched as soon as the final grade is achieved. Also, these disturbed areas must be protected until permanent vegetation is established;
5. Georgia DOT type "C" silt fence or an approved high performance silt fence must be installed on the site perimeter wherever the stormwater

Ms. Raquel Clement
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March 14, 2013


may be discharged, and a double row must be installed between the land disturbing activities and State waters;

6. Buffer variance conditions must be incorporated into any Land Disturbing Activity Permit which may be issued by the City of Macon for this project;
7. This project must be conducted in strict adherence to the approved erosion and sedimentation control plan and any Land Disturbing Activity Permit which may be issued by the City of Macon for this project; and
8. Post-construction stormwater management systems must be maintained to insure pollutant removal efficiencies for water quality protection.

The granting of this approval does not relieve you of any obligation or responsibility for complying with the provisions of any other law or regulations of any federal, local or additional State authority, nor does it obligate any of the aforementioned to permit this project if they do not concur with its concept of development/control. As a delegated "Issuing Authority," the City of Macon is expected to ensure that the stream buffer variance requirements are met for this project and is empowered to be more restrictive in this regard.

If you have any questions concerning this letter, please contact Peggy Chambers, Erosion and Sedimentation Control Unit, NonPoint Source Program, at (404) 675-6240.

Sincerely,


Judson H. Turner
Director

JHT:pc

cc: Honorable Robert Reichert
Danny Tavakol
Reece Parker
Steve Schleiger
Luke Crosson
Todd Bethune

File: BV-011-12-03

From: "Clement, Raquel" <raquel.clement@gsfic.ga.gov>
To: "Peggy Chambers" <Peggy.Chambers@dnr.state.ga.us>
CC: "Anna Bass" <ABass@doe.k12.ga.us>, "Cindy Gibson" <cgibson@doe.k12.ga.us...>
Date: 2/14/2013 9:06 AM
Subject: SBE-22B Georgia Academy of the Blind (GAB) Campus Infrastructure (Storm Water Project)
Attachments: Combined Photos - 8.5x11.pdf; PHOTO KEY PLAN 2013.02.12.pdf

Peggy Chambers,

The delay in this response was warranted to the peculiar nature of the communication which this email addresses. While we all have received Dr. Holliday's recommendations and comments regarding this project, we do not agree on several points. In short, the goal here is to state the facts regarding this project's scope, budget, mission, design and its status to insure that we are choosing the best solution of the facility.

Scope: SBE-22B Georgia Academy of the Blind (GAB) Campus Infrastructure (Storm Water Project) - Improvements to open storm water drainage system including correction of the deteriorated existing system where soil erosion at water channel banks causes falling trees, pest hazards, impact on foundation of Health Services Building, and damage to existing concrete drainage system.

The attachment shows the erosion, deterioration and the proximity of the system to the buildings and play areas. In addition, during assessment stage, a video survey was conducted of the existing 48" CMP under the walkway and drive. It shows signs of corrosion and undermining. These sections of pipe will be replaced with new 72" Reinforced Concrete Pipe. There will be a total 297' of concrete pipe utilized.

Project Budget: \$667,000.

Mission: To provide safe access living area and safe playing area for the students and to aid the faculty, staff and parents of the Georgia Academy of the Blind.

The dedicated design team has not worked in a vacuum. Priorities were set primarily in the regard to the student body which inhabits this space, 24 hours a day which consideration to the budget and schedule necessary for its completion. In this special circumstance, the safety of the children is the primary concern additional considerations for other disabilities in some cases. The team has not been misdirected but was given a clear direction by the GAB former director, Dr. Arensman, GAB, GA DOE and GSFIC. Once design was complete the project will provide the students with a safe environment, clear of hazards. At present, a person monitors the children crossing the bridge to and from their cottages. The hazardous area has also provided lots of mosquitos and a number of snakes.

Quick timeline of events:

- * Project Kick-off meeting - 06.17.11
- * Final Scope Review - 8.2011

- * Redefined project limits due to USACOE-12.2011 (reduction of pipe length)
- * Receive final survey - 01.27.12
- * Receive Geo-technical report - 02.20.12
- * Review of Architectural Design- 3.2012
- * Owner approval of preliminary design and NTP with USACOE submittal - 05.08.12 (Estimated 16 week review period)
- * Filed Pre-Construction Notification to USACOE - 05.30.12
- * USACOE Nationwide Permit Authorized - 07.23.12
- * Submit to GA EPD - 09.12.12 (estimated 20 week review)
- * Submit to City of Macon for LDP - 10.03.12 (Contingent on EPD approval)
- * Notice from GA EPD to publish a public notice - 11.05.12
- * Public notice published in the Macon Telegraph - 11.17.12
- * Received notice from GA EPD of public objection - 12.13.12
- * Met with Dr. Holliday on site to discuss the project - 01.11.13
- * Civil Engineer filed formal response to objection with GA EPD - 01.24.13
- * Revised drawings to Dr. Holliday's reflect comments - 01.29.13
- * Resubmit drawings to GA EPD - 01.29.13
- * Revised drawings to reflect concrete splash pad for Health Services Building due to Dr. Holliday's comment - 02.11.13

The USACE approval includes the purchase of 1,233 mitigation credits in the amount of \$14,000. These credits can be utilized anywhere in the state. The initial plan included piping 400 feet, GAB wanted to pipe as much of the stream as possible. The design team scaled it back due to the regulations of the Nationwide Permit to the Army Corps of Engineers Review Process which restricts the length of pipe. There is a beautification component of this project that has not been highlighted. It is located in the western section of the site behind Cottage 6 (plan attached). The plan includes clearing and grubbing the area so that the natural habitat can be seen and utilized.

The EPD process has taken approximately 21 weeks as of today. The public objection was submitted at which time a site meeting was set to discuss recommendations. Select members of the design team met with Dr. Holliday with the goal of discussing the engineering components of the project which is the basis of this design.

During that site visit held on 1.11.13, Dr. Holiday agreed that these items were priority:

1. Student Safety
2. Structural integrity of the existing Health Building
3. Environmental Sensitivity

This is stated in meeting minutes submitted by Dr. Holiday on 1.18.2013.

Since that date, the project engineer updated the plans in regards to Dr. Holiday's recommendations regarding the removal of invasive plant material. The invasive plants are to remain and additional measures were taken to prevent mud splash on the buildings. Dr. Holliday also suggested the armoring the steep banks with rip rap or stone but the EPD recommended avoiding stream bank armoring due to its imperviousness. This alternate would still provide unsafe environment for the children.

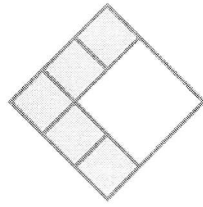
In regards to the piping component of the project, it is necessary. Engineers took in account the findings of the soil borings report which concluded that there are residual solid near the ground surface and that all surfaces in the area are advanced weathering. With increased depth the soils are more course, therefore there will be continued erosion in this area. The best way to insure the stability of the area is to pipe the stream in the areas closest to the 2 existing dormitories and Health Building. The sidewalk shown is used by students daily to go to and from classes. The additional green space does aid in the prevention of soil erosion and absorbs rainwater, thereby improving drainage, producing more green space. There is an opportunity to provide a safer environment which is more stable.

Lastly, there is a public park located on Vineville Avenue which is an Arterial Roadway. It is State Route 41. It would be a difficult task to negotiate these children along this route to play. This alternate is not one that could be considered due to the obvious hazards, high speed traffic and congestion.

All of these factors and many others were taken into account during the design of SBE-22B Georgia Academy of the Blind (GAB) Campus Infrastructure (Storm Water Project). For the sake and welfare of the Georgia Academy of the Blind students, faculty, staff and parents, GSFIC is requesting for the GA EPD allow us to move forward with the construction of this project.

Thank you,

Raquel Clement
Project Manager
Georgia State Financing And Investment Commission
The Construction Division
270 Washington Street, Second Floor
Atlanta, Georgia 30334
Phone: (404)798-2149
email: raquel.clement@gsfic.ga.gov



Breedlove
Land Planning, Inc.
Landscape Architects • Site Planners • Consulting Engineers

January 24, 2013

Ms. Peggy Chambers
Georgia Environmental Protection Division
2 Martin Luther King Jr. Drive
Suite 1152, East Tower
Atlanta, GA 30334

Dear Ms. Chambers:

The following is our response to Dr. Lindsay Holliday's comments regarding the Buffer Variances for the Georgia Academy for the Blind Improvements project in the City of Macon, which we received from your office on December 12, 2012:

1. The land in the vicinity of the upper creek is used too frequently by vision and mobility-impaired students to make it a good place for a natural campus feature. Student safety would continue to be an issue. The lower creek is a better location for a natural campus feature because of its distance from occupied buildings.
2. As a means of preventing future issues with the Health Services Building foundation, piping the existing channel offers a more effective and less costly solution than alternatives. As part of this project, a roof gutter or a splash pad will be installed on the east side of the Health Services Building to address minor erosion that Dr. Holliday identified to be occurring in that area.
3. As you know, Dr. Holliday believes the removal of the evasive exotic plant material located in the area below the proposed buffer encroachment will not be successful and thus not be beneficial. The Owner agrees and has requested the construction documents be revised to remove Drawing sheet C500, which would have required the contractor to eradicate the evasive exotic plant material from that area and replant with native species of vegetation consisting of ground cover and shrubs, as well as understory and overstory trees.

Please do not hesitate contacting me if you have any questions or concerns with our response to Dr. Holliday's comments.

Sincerely,

Reece Parker
Breedlove Land Planning, Inc.

C: Raquel Clement (GSFIC)
Richard Ellison (GSSTJ)