

3338 Country Club Road #L336 Valdosta, Georgia 31605 September 5, 2014

Valdosta City Council 216 East Central Ave Valdosta, GA 31601

Dear Valdosta City Council Members,

WWALS Watershed Coalition, Inc. would like to draw your attention to some issues related to rezoning VA-2014-07 Brooks Turner LLC at the corner of Baytree and Azalea Drive. As you are aware, flooding in Sugar Creek has been a problem for many years. The proposed development of lots between Baytree and Pinetree will result in the removal of approximately seventy (70) mature pine trees, increase paving percentage (the lots are mostly grass with clearly less than 50% covered by rooftops and hard paved surfaces), and most dramatically replace 9 single housing units with 45 units, each with 4 proposed bedrooms. The increase in paving will likely be greater than 80% impervious surfaces, with 5 times the number of units, adding pressure to already stressed infrastructure.

The Land Development Regulations (LDR) regarding storm water management (Chapter 310-1) says:

Require that new development and redevelopment maintain the pre-development hydrologic response in their post-development state as nearly as practicable in order to reduce flooding, streambank erosion, non-point source pollution and increases in stream temperature, and maintain the integrity of stream channels and aquatic habitats;

The suggestion of a three foot berm on the Pinetree side of the proposed development has the potential to cause a dramatic change in how and where the water runs. Water that currently collects in the ditches or yards on Pinetree might be diverted in such a way that it flows to put additional pressure on the One Mile Branch or Sugar Creek. This could contribute to the flooding problem that already caused Valdosta to call in the U.S. Army Corps of Engineers for a flooding study.

There are many issues not addressed in this letter, including is there an actual need for this many additional student housing units given the current high vacancy rates in the area and what additional traffic will actually be generated, the developers suggest little as the residents will walk to class, however they will drive to the mall or other places.

WWALS Watershed Coalition Inc, respectfully asks that you completely consider the environmental impacts of the proposed zoning change before making any vote.

Sincerely, WWALS Board of Directors John S. Quarterman, President Dave Hetzel, Ambassador Garry Gentry, Secretary Gretchen Quarterman, Treasurer Al Browning Chris Graham April Huntley Karan Rawlins Bret Wagenhorst

WWALS is an advocacy organization working for watershed conservation of the Willacoochee, Withlacoochee, Alapaha, and Little River Systems watershed in south Georgia and north Florida through awareness, environmental monitoring, and citizen advocacy.