



COUNTY OF AUGUSTA
COMMONWEALTH OF VIRGINIA
DEPARTMENT OF COMMUNITY DEVELOPMENT
P.O. BOX 590
COUNTY GOVERNMENT CENTER
VERONA, VA 24482-0590



MEMORANDUM

TO: Augusta County Planning Commission
FROM: Leslie Tate, Senior Planner
DATE: August 5, 2019
SUBJECT: Regular Meeting

The regular meeting of the Augusta County Planning Commission will be held on **Tuesday, August 13, 2019 at 7:00 p.m.**, at the Augusta County Government Center, in the Main Board Meeting Room, 18 Government Center Lane, Verona, Virginia.

The Planning Commission will meet beginning at **6:30 pm** in the **Board of Supervisors' Conference Room** (behind the Board Meeting Room) at the Augusta County Government Center for a briefing on updated staff comments.

Attached are the agenda and meeting materials for Tuesday's meeting.

If you have any questions about any of the material, please feel free to contact me. If you won't be able to attend the meeting, please let Sara or me know as soon as possible.

LT/st

A G E N D A

Regular Meeting of the Augusta County Planning Commission

Tuesday, August 13, 2019 7:00 P.M.

1. CALL TO ORDER
2. DETERMINATION OF A QUORUM
3. APPROVAL OF THE MINUTES
 - A. Approval of the Called and Regular Meetings on July 9, 2019
4. PUBLIC HEARING
 - A. A request to rezone from General Agriculture to Rural Residential approximately 33.136 acres (TMP 046 5B and 045 98A) owned by Martin F. or Linda C. Lightsey located on the west side of Spring Hill Road (Rt. 613), approximately 0.4 miles north of the intersection of Berry Farm Road (Rt. 626) and Spring Hill Road (Rt. 613) in Staunton in the Pastures District. The proposed general use of the property is residential with a 2 acre lot minimum. The general use of the property stated in the Comprehensive Plan is low density residential development which is ½ to 1 unit per acre. Fire flow requirements per Chapter 24 of the Augusta County Code cannot be met by the public system; therefore, the applicant will request a waiver of such standard by the Board of Supervisors. In conjunction with such request, the applicant has submitted proffers which are summarized as follows: Installation of an 8" water line and hydrant on the west side of Spring Hill Road at an elevation no higher than the existing hydrant on the east side of the road. Installation, at 12" below grade level, of a 10,000 gallon underground water storage tank operated by a well and pump system to provide water replacement as needed to the storage tank. Maintenance of the above mentioned system will be the responsibility of a property owners' Homeowners Association.
5. MATTERS TO BE PRESENTED BY THE PUBLIC
6. NEW BUSINESS
7. OLD BUSINESS
8. MATTERS TO BE PRESENTED BY THE COMMISSION
9. STAFF REPORTS
 - A. Information for Commission – Code of Virginia, Section 15.2-2310
(Board of Zoning Appeals Items)
10. ADJOURNMENT

PRESENT: T. Jennings, Chairman
S. Bridge
G. Campbell, Vice Chairman
L. Howdysshell
K. Shiflett
J. Wilkinson, Director of Community Development
L. Tate, Planner II

Agenda Item # 4-A

Date 8/16/19

ABSENT: J. Curd
K. Leonard

VIRGINIA: At the Called Meeting of the Augusta County Planning Commission held on Tuesday, July 9, 2019, at 5:45 p.m. in the Board Room, Augusta County Government Center, Verona, Virginia.

Mr. Jennings called the meeting to order.

Mrs. Tate reviewed with the Commissioners the items coming before the BZA in August, sharing aerial maps of the properties and specifics of the application requests.

The Planning Commission reviewed the following rezoning request and traveled to the following site, which will be considered at the Public Hearing.

**2330 Spring Hill Rd.
Lightsey Property**

Chairman

Secretary

PRESENT: T. Jennings, Chairman
G. Campbell
S. Bridge
L. Howdyshell
K. Leonard
K. Shiflett
J. Wilkinson, Director of Community Development
L. Tate, Planner II

ABSENT: J. Curd

VIRGINIA: At the Regular Meeting of the Augusta County Planning Commission held on Tuesday, July 9, 2019, at 7:00 p.m. in the Board Room, Augusta County Government Center, Verona, Virginia.

DETERMINATION OF A QUORUM

Mr. Jennings stated as there were six (6) members present, there was a quorum.

Minutes

Mr. Bridge moved to approve the minutes of the called and regular meeting held on June 11, 2019.

Mr. Howdyshell seconded the motion, which carried unanimously.

Public Hearing

Mr. Jennings read the zoning request from Martin and Linda Lightsey, to rezone approximately 33.136 acres located on Spring Hill Rd. from General Agriculture to Rural Residential.

Mrs. Tate commented on the staff report stating that the request is in compliance with the Comprehensive Plan Future Land Use Map. Mrs. Tate also stated that the public water system for the area of request does not meet minimum fire flow requirements.

Mr. Lightsey, the property owner, along with his wife were present at the meeting. Mr. Lightsey said he would be happy to answer any questions.

Mr. Jennings opened the public hearing by asking if there was anyone present who wanted to speak in favor of the requested rezoning. With no one being for the rezoning, he then asked if anyone wanted to speak in opposition to the rezoning.

Mr. Gary Roberson, an adjacent property owner, spoke in opposition to the request. Mr. Roberson stated he had three main concerns. He stated that he is concerned about the potential water run-off from the property, traffic on Rt. 262 to Springhill Rd, and about the loss of General Agriculture land to development.

Frank Butler, a long-time resident of Spring Hill Rd., also spoke in opposition to the request. Mr. Butler is concerned about the traffic on Springhill Rd. He stated that the road is currently not in good condition. Mr. Butler also stated that he is at the end of the county water line and that there is barely enough pressure to meet county requirements.

Jocelyn Audet of 336 Berry Farm Rd. stated that she wasn't either for or against the proposed rezoning at this time. She stated that she agreed with the traffic concerns but also understands what the Lightseys are wanting to do with their own property.

James Lihos of 2236 Spring Hill Rd. stated that he was for the rezoning. Mr. Lihos stated that he felt comfortable with Mr. Lightseys layout of the property. He mentioned that he thought this rezoning would have happened years ago.

Chris Fauber of 2349 Spring Hill Rd. spoke against the rezoning. He stated that farmland is disappearing fast and that he would like to see the land stay in General Agriculture. He also stated that he is concerned about the water run-off in the road.

Hercy Campbell of 2170 Spring Hill Rd. stated that he was concerned with the traffic. He stated that he felt the intersection of Spring Hill Rd and Rt. 262 was one of the most dangerous intersections.

Chad Hinegardner of 2569 Spring Hill Rd. stated that he was at the end of the water line and wanted to know about the Augusta County Service Authority comments.

Mrs. Tate reviewed the Service Authority comments that stated that the water system in this area is not capable of providing the needed fire flow to comply with the Augusta County Code. The Service Authority also stated in their comments that an extension of a public main onto the property would further degrade the available flow to portions of the existing system. At present, the total available flow is around 375 gallons a minute. There are no current plans to improve the water service in the area.

Jenny Hinegardner of 2569 Spring Hill Rd. stated that she was against the rezoning. She stated that if the rezoning were to happen it would only snowball and we would end up losing all the farmland.

Mr. Howdysshell stated that he would like to hear from Mr. Lightsey about how he plans to address the water pressure and the fire flow.

Mr. Lightsey stated that they proposed to have a 10,000-gallon underground water tank with a connection for fire trucks to hook up to. It is also proposed to install a fire hydrant within the subdivision.

Mr. Howdysshell asked what would happen to the pressure when water was pulled out.

Mr. Lightsey stated that the current water line would deliver around 375 gallons a minute without going below 20 psi.

Mrs. Tate responded by mentioning that the tank was intended to have the water maintained by an automatic water level control. Refilling of the tank in the instance of a fire would further reduce the available flow to existing hydrants along the water system.

Mr. Jennings asked Mr. Lightsey if the proposal for the underground water tank was part of the original rezoning request.

Mr. Lightsey answered that when he was first given the initial assessment from staff there was no mention of fire flow issues, but a comment that some people may need to use booster pumps to achieve adequate pressure. Mr. Lightsey stated that he was further advised that if he were planning to ask for a waiver on the fire flow requirements that he would have to propose an alternative system that would offer satisfactory fire protection.

Mr. Jennings asked who would own the water tank.

Mr. Lightsey stated that the homeowners association would own and be responsible for any and all maintenance needed on the water tank.

Mrs. Shiflett stated that the proposal for the water tank would need to go through a waiver process and be presented to the Board of Supervisors. Mrs. Shiflett advised that the proposal for rezoning would depend on the fire flow waiver from the Board of Supervisors.

Mr. Howdysshell made a motion to continue the public hearing on this matter until next month.

Mrs. Shiflett seconded the motion.

STAFF REPORTS

A. CODE OF VIRGINIA – SECTION 15.2-2310

Mrs. Tate reviewed with the Commissioners the requests coming before the BZA at the August meeting. There was an application for a special use permit for Shenandoah Acres to continue existing campground and cottages, with a seasonal restaurant, and to increase the number of extended stay sites occupied more than 240 days. There was also an application for a special use permit for property owned by Joseph Shommo located on 676 Haytie Ln in Swoope, to have a short-term vacation rental.

The Planning Commission took no action on the BZA items.

There being no further business to come before the Commission, the meeting was adjourned.

Chairman

Secretary

COUNTY OF AUGUSTA
STAFF REPORT
Martin F. or Linda C. Lightsey
July 9, 2019
Updated August 5, 2019 (Updates in italics)

SUMMARY OF REQUEST: A request to rezone from General Agriculture to Rural Residential approximately 33.136 acres (TMP 046 5B and 045 98A) owned by Martin F. or Linda C. Lightsey located on the west side of Spring Hill Road (Rt. 613), approximately 0.4 miles north of the intersection of Berry Farm Road (Rt. 626) and Spring Hill Road (Rt. 613) in Staunton in the Pastures District. The proposed general use of the property is residential with a 2 acre lot minimum. The general use of the property stated in the Comprehensive Plan is low density residential development which is ½ to 1 unit per acre.

PROPOSED PROFFERS:

The following conditions represent the applicant's proposal to demonstrate adequate fire protection for the development as is required when requesting a waiver by the Board of Supervisors from Chapter 24 Section 24-2 of Augusta County Code. (See Section 24-2.E.):

- 1. Prior to the issuance of a certificate of occupancy for the first dwelling constructed within the Rural Residential subdivision, an 8" water line and hydrant on the west side of Spring Hill Road shall be installed at an elevation no higher than the existing hydrant on the east side of the road.*
- 2. Prior to the issuance of a certificate of occupancy for the first dwelling constructed within the Rural Residential subdivision, a 10,000-gallon water storage tank shall be installed near the terminus and cul-de-sac of the proposed public street serving the sub-divided property, with plumbing fittings as prescribed by the Augusta County Fire Department.*
- 3. The aforementioned tank shall be operated by a well and pump system (or equivalent) to provide water replacement as needed to the storage tank, and thereby automatically maintain the water level in the storage tank (with a float valve).*
- 4. The storage tank shall be installed approximately 12" below grade level.*
- 5. Maintenance of the above-described system shall be the responsibility of a property owners' Home Owners Association.*

VICINITY ZONING: General Agriculture zoning to the north, east, south, and west.

CURRENT ZONING: General Agriculture and Source Water Protection Overlay Area 2

COMPREHENSIVE PLAN PLANNING POLICY AREA/FUTURE LAND USE

DESIGNATION: Community Development Area/Low Density Residential

COMMENTS FROM ENGINEER:

Environment Ordinance Considerations

The applicant is advised to contact the U.S. Army Corps of Engineers and the Virginia Department of Environmental Quality for any requirements related to proposed work in wetland areas or adjacent to any streams.

This property drains to Middle River which is listed on the Virginia DEQ Draft 2018 Impaired Waters List. This impaired segment extends from the quarry discharge west of Franks Mill downstream to its confluence with Christians Creek. The impaired use is aquatic life, the specific impairments are violations of the general benthics standard. Likely sources are Agriculture and Non-Point sources. For the bacterial impairments, this segment is included in the EPA approved Middle River bacteria TMDL which must be considered by the applicant. (Federal TMDL ID # 24515)

Additionally, the 2007 Augusta County Comprehensive Plan lists the Middle River – Falling Spring Run watershed as a Priority Watershed for Groundwater Protection due to the presence of karst features and the location of Source Water Assessment Program zones.

Overlay Ordinance Considerations

This property lies within Area 2 of the Source Water Protection Overlay (SWPO) District. All provisions of the Source Water Protection Ordinance (SWPO) must be satisfied. Additionally, for Source Water & Recharge Areas, the Comprehensive Plan recommends restriction of land uses that pose a contaminant threat. Additionally, stormwater practices that infiltrate or can contaminate groundwater should be avoided. Water quality treatment and revegetation are recommended. These items will be addressed at construction plan stage.

This property lies outside of the Airport Overlay District (APO).

This property lies within Zone X on the FEMA FIRM and therefore is outside the Special Flood Hazard Area and not subject to the Floodplain Overlay Ordinance (FPO).

Subdivision Ordinance Considerations

§21-9.1 Subsection B of the County Subdivision Ordinance addresses street layout and access to adjacent property. Development is required to connect to existing or planned streets and must also provide for access to adjacent property that is located with areas designated in the Comprehensive Plan as Urban Service or Community Development Areas. The properties to the north and south of this parcel are substantially subdivided and thus a connection is not practical, however

a connection to the west will likely be required. The concept plan dated March 25, 2019 and submitted with the rezoning does show a connection to the west.

Natural Resources Recommendations from the Comprehensive Plan

The Augusta County Comprehensive Plan recommends performance standards to protect natural resources. For Community Development Areas, a riparian buffer of 35 feet on either side of a stream is encouraged, and stormwater should not be piped through in a manner to short-cut the buffer. Additionally, floodplain areas should have no habitable structures, but should instead be utilized for greenways & recreation areas.

For Source Water & Recharge Areas, the Comprehensive Plan recommends preservation of open space to the extent feasible and restriction of land uses that pose a contaminant threat. Additionally, stormwater practices that infiltrate or can contaminate groundwater should be avoided, water quality treatment and revegetation are recommended, and enhanced onsite sewage disposal systems should be utilized.

Wetlands may or may not exist on the site. For Wetland areas, the Comprehensive Plan recommends provision of a 35 foot buffer from the edge of wetlands.

For unique natural features such as caves, major karst features, critical habitats, etc., the Comprehensive Plan recommends to tie these features in with greenways, active and passive recreation areas and flood plain preservation areas.

COMMENTS FROM ZONING ADMINISTRATOR:

Zoning feels that rezoning the property to Rural Residential development would provide less impact to the adjacent single family dwellings than sight, sounds, and smells of permitted agricultural uses and would be compatible with the existing rural character of the neighborhood.

COMMENTS FROM ACSA:

1. Water ~~and sewer~~ capacities are not reserved until system adequacy is determined (supply, treatment, transmission) and payment of the connection fees has been received in accordance with Service Authority Policy. Augusta County Service Authority Policies and Procedures can be found at <http://www.acsawater.com/oppm>.
2. Any engineering evaluations and upgrades or extensions would be the responsibility of the owner/developer and are subject to Service Authority review and approval.
3. **Important Note:** The water system in this area is not capable of providing the needed fire flow to comply with Chapter 24 of the Augusta County Code

requirements for the proposed use of the property. The owner is advised to discuss this with the County. Additionally, due to the topography of the property (increasing in elevation from the existing water main), extension of a public main onto the property would further degrade the available flow to other portions of the existing system. Total available flow (domestic and fire flow) is less than 400 gallons per minute. Any new connections will further reduce this total available flow for this area. ~~Public water service could be provided for the residential lots shown on the proposed subdivision layout, however, the estimated impact of this would be a reduction of the total available flow in the area to around 300 gpm based on an assumed average demand.~~ It must be acknowledged that this lowers an already deficient fire protection system. The new service connections (meters) must not be located at an elevation that exceeds any existing service along Spring Hill Road. To accomplish this, new services ~~may would~~ need to be located along the existing water main. Private pumps will likely be required to ensure pressures are maintained above minimum requirements/acceptable levels.

Note that there is no current plan for how to improve water service in this area. A tank at a higher elevation, which would require a booster station, would probably be required. However, a study of this has not been performed and would be needed to better identify a solution for the entire area. Because of this, any upgrades, studies or extensions would be the responsibility of the owner/developer and are subject to Service Authority review and approval.

4. Water service in this area is provided by the ACSA *through an agreement with the City of Staunton.* Our agreement with the City does not obligate them to provide fire flow in any way.
5. There is an existing 6" waterline across from the subject property along Springhill Road. Static pressures are around 45 psi.
6. There is no public sewer available in the area of the subject property.

(Updated): *The ACSA would like landowners who purchase property within the subdivision to know that the alternate source of water for fire suppression intends to supplement the public system which is not capable of meeting the ordinance requirements. Furthermore, the ACSA would like landowners to know that the supplemental system for fire suppression does not meet any public water system standards and it will not be the responsibility of the public water and sewer provider to maintain and/or replace.*

Utilizing the Virginia Department of Health equation for a peak hour demand, the proposed 9 homes use approximately 40 gallons/minute during a peak hour. ACSA performed a field test on July 24, 2019. A simulated demand at the estimated peak hour of approx. 40 gallons per minute did not produce any measurable pressure change in the main on Spring Hill Road.

COMMENTS FROM HEALTH DEPARTMENT: The health department will need to review and approve any proposed sewage disposal systems.

COMMENTS FROM FIRE-RESCUE: Fire-Rescue sees little to no impact on service delivery from this request. There seems to be public water in this area, the developer needs to ensure there will be proper fire flow for the development. Fire-Rescue has no further comment.

(Updated): *The installation of a 10,000 water tank will not provide the needed fire flow for this project. Fire Rescue will not be able to sign off on the plan until needed fire flow is met.*

TRAFFIC:

Traffic Data: Rt. 613 Spring Hill Road

-AADT: 870 vpd (2018)

-Posted Speed Limit: Unposted (statutory 55 mph)

-K-Factor: 0.110 Dir. Factor: 0.536

-Functional Class: Major Collector

COMMENTS FROM VDOT:

1. The potential development of 33 acres of Rural Residential property is expected to allow for up to 16 residential lots, generating approximately 160 vehicle trips per day (note that only ten lots are provided in the concept plan). The traffic generation is not expected to have a significant impact to surrounding roadways and will not warrant a Chapter 527 VDOT Traffic Impact Analysis.
2. Any entrance must be designed and constructed in accordance with VDOT requirements in Appendix F of the Road Design Manual. Access Management Spacing requirements apply since the roadway is classified as a Collector. VDOT understands that Hamrick Engineering has verified an entrance that meets VDOT spacing and sight distance requirements.
3. The intersection of Rt. 262 and Rt. 613 is proposed to be improved with a grade separated diamond interchange. Construction funds are not currently allocated.
4. Any new public streets are required to meet the VDOT geometric standards (GS-SSAR) and street acceptance requirements. The development would require two external connections via access

to a public road or approved stub-out to adjacent property unless approved via connectivity waiver.

5. There were no proffered conditions provided with the application reviewed by VDOT.

SCHOOL BOARD STAFF COMMENTS:

The request for a change of approximately 32.16 and 1 acre from General Agriculture to Rural Residential would have little impact on these three (3) schools as the lots appear to total 10 lots.

The table below indicates the enrollment as of June 19, 2019

School	Enrollment	Capacity
Clymore Elem (CLES)	781	834
Stewart Middle (SMS)	505	720
Fort Defiance (FDHS)	770	900

COMMUNITY DEVELOPMENT STAFF COMMENTS:

PROS

1. The request is in compliance with the Comprehensive Plan Future Land Use Map which designates this property for Low Density Residential development (1/2 to 1 unit per acre).
2. The request would likely be compatible with adjacent single family dwellings, developed in General Agriculture zoning.
3. Request would have little impact on public schools within the service area.

CONS

1. The public water system does not meet minimum fire flow requirements of Chapter 24 of the Augusta County Code.

COMMUNITY DEVELOPMENT STAFF RECOMMENDATION:

Staff feels that the request is in keeping with the Comprehensive Plan Future Land Use Map which designates this property for low density residential development on public water; however, the public water system in this area is not adequate to provide the minimum fire flow requirements. The submitted concept plan shows 10 lots, although the applicant could construct more lots with the 2 acre minimum lot size requirement. The reason the concept plan does not show additional lots on the portion of the property farthest from Springhill Road is related to topography and its exacerbating effects on low water pressure.

The applicant will be requesting a fire flow waiver from the Board of Supervisors related to this rezoning request and such request will be reviewed by Fire-Rescue. At this time, Fire-Rescue has indicated that a fire flow waiver of residential projects does not affect the County's ISO rating but would likely affect property owner insurance rates.

The Chapter 24 provision for the Board of Supervisors to grant a fire flow waiver reads as follows:

Section. 24-2

E. Upon application of the developer and for good cause shown, the standards for buildings or subdivisions set forth in paragraphs A through D above may be waived or reduced by the Board of Supervisors, provided that the developer can demonstrate that there is adequate fire protection available for the proposed development.

Below are some excerpts from the Comprehensive Plan related to fire flow:

Goal 2: Establish a land use and development pattern that facilitates the efficient provision of public safety services.

Objective A: Encourage a compact and efficient development pattern that permits the most cost effective provision of public safety services. Encourage developers to work with public safety agencies to provide any land or improvements necessary to ensure the efficient provision of public safety services.

Objective B: Ensure that sufficient fire flow is available throughout the county's public water system, or there are adequate alternative means of fire suppression if sufficient fire flow is not available, to permit public safety agencies to respond efficiently to fires.

Policy 2: Funding Improvements. The county should continue its efforts to fund fire flow upgrades, leveraging private and other public dollars, where possible. The county should consider incorporating fire flow upgrades into the county's Capital Improvement Plan.

Policy 3: Tanker Strike Team. The county should continue to support the efforts of the Tanker Strike Team to enhance fire protection in areas where sufficient fire flow is not available.

Staff will also point out that a past rezoning request, approved in 2014, had a proffer which stated the following:

At final plat stage, a determination will be made as to whether or not the lots being created will have sufficient fire flow to meet the current requirements of the

Augusta County Code. If it is determined that the section being platted does not meet the fire flow standards, then the plat of such subdivision, every deed of subdivision and every deed of conveyance of any lot or parcel of land not having the required fire flow, shall contain a statement as follows: "It is recognized that as of the recordation date of this plat, there was not adequate fire flow to meet the fire flow requirements of the Augusta County Code."

I believe this proffer was submitted in order to allay the concern that landowners would purchase property unaware of the lack of minimum fire flow requirements.

With this request, as submitted, staff would have the same concerns.

While staff has concerns about the approval of a residential fire flow waiver, if the Board chose to grant the waiver, staff has identified no other outstanding concerns with the rezoning request. Without seeing the justification for the waiver request and how adequate fire protection will still be provided, staff is unable to comment to such a waiver and cannot make a recommendation on the rezoning request at this time.

Updated Comments (August 5, 2019): *The applicant has submitted a boundary line adjustment (BLA) and revised rezoning exhibit, which reduced the acreage of the rezoning request from 33.136 acres to 21.23 acres. The applicant's originally submitted rezoning exhibit showed the BLA portion of the parcel was not planned for development but it was still left in the rezoning, and now it has been removed.*

The applicant has proffered conditions in an attempt to provide "an adequate fire protection plan" as is referenced in the ordinance provision for requesting a fire flow waiver from the Board of Supervisors. After speaking with the County Attorney, the Board cannot act on a fire flow waiver prior to acting on a rezoning request as there would be nothing to waive without the rezoning approval. Therefore, the Planning Commission needs to send their recommendation on the rezoning request to the Board of Supervisors prior to the Board holding their public hearing on the rezoning and also considering the fire flow waiver.

The underground storage tank (one 10,000 gallon tank) as proposed does not meet the fire flow requirement, and even if it did, there are some issues raised by the ACSA regarding property owner knowledge that the system is privately owned and maintained and does not meet public system standards. Staff is concerned about the precedent a residential fire flow waiver could set; however, staff has no other concerns related to the request. Staff could recommend the Planning Commission recommend approval of the rezoning request to the Board of Supervisors contingent upon fire flow being met per the County ordinance or through Board waiver.



JOB No. 01025 '9 SCALE 1" = 50' DATE MAR 25, 2013 SHEET No. 1 OF 1	LIGHTSEY REZONING NORTH RIVER DISTRICT AUGUSTA COUNTY VIRGINIA	REZONING PLAN	HE HAMRICK ENGINEERING P.C. Land Planning • Public Works • Environmental Brent W. Hamrick, Jr., P.E. 128 Laurel Hill Road Salem, VA 24153 540-345-1977 hwh@hamrick.com	DATE REVISION DESCRIPTION	3 of 16
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1 inch = 418 feet



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