

The Northeast Georgia Regional Commission (NEGRC) has completed its review of the following Development of Regional Impact (DRI). This report contains the NEGRC’s assessment of how the proposed project relates to the policies, programs, and projects articulated in the Regional Plan and Regional Resource Plan. Also included is an assessment of likely interjurisdictional impacts resulting from the proposed development, as well as all comments received from identified affected parties and others during the fifteen-day comment period.

The materials presented in this report are purely advisory and under no circumstances should be considered as binding or infringing upon the host jurisdiction’s right to determine for itself the appropriateness of development within its boundaries.

Transmittal of this DRI report officially completes the DRI process. The submitting local government may proceed with whatever final official actions it deems appropriate regarding the proposed project, but it is encouraged to take the materials presented in the DRI report into consideration when rendering its decision.

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<b>Project I.D.:</b>	DRI #4168
<b>Name of Project:</b>	Auburn Drinking Water Supply Project
<b>Name of Host Jurisdiction:</b>	City of Auburn

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### Background

DRI review was initiated due to the City of Auburn’s state environmental review process (SERP) for the project. Potentially affected parties were asked to submit comments on the proposal during the 16-day period of 4/5/2024 – 4/21/2024.

### Proposed Development

The City of Auburn proposes a water infrastructure project with the following components:

- Construct a drinking water treatment plant with a 1.59 MGD production capacity,
- Convert a vacant quarry into a 1.1-billion-gallon raw water storage pond, RSWP, (reservoir),
- Install two raw water intakes within Rock Creek next to the RWSP to fill the reservoir,
- Construct four pump stations to transport raw water from the RWSP to Auburn’s and Winder’s drinking water treatment plants,
- Construct a water intake and pump station along both the Little Mulberry River and the Mulberry River, whose water would be conveyed to the raw water storage pond via a 5-mile water line, and
- Install associated water pipelines (16,268 LF +/-) and other water infrastructure to transfer raw water to the water treatment plant and treated drinking water to the water systems.

### Proposed Infrastructure Adjacent to Existing Quarry

To fill the proposed water storage pond, the City proposes to construct two gravity water intakes that would withdraw water from Rock Creek, which is adjacent to the existing quarry, and deliver it to the RWSP. Winder proposes, under a separate but cooperative project, to construct two intakes, two pump stations, and a 5-mile raw water transmission line from the Little Mulberry and Mulberry River to the RWSP (see below for

additional details). This water would be transferred to the Auburn and Winder water treatment plants via one Rock Creek raw water pump station, one low water pump station, one raw water transfer pump station, and two raw water force mains. A 24" water main would transfer water from the area to the City of Winder's existing drinking water treatment plant (this plant is not included in this DRI's scope).

To transfer treated drinking water to Auburn's existing water system, the City proposes to install a 3,200 linear foot-long line westward to connect to an existing line along Mt. Morah Road and a 5,500 foot-long 12" water main line southward along Parks Mill Road to connect to a water line at County Line - Auburn Road. This 12" main line along Parks Mill Road would replace an existing, aging, 8" water main. Additional proposed infrastructure in this area includes a 2,100 linear-foot 6" backwash water force main from the Auburn Water Treatment Plant to an existing sediment pond and a hydro-electric energy recovery turbine.

### **Proposed Infrastructure at the Intersection of Kilcrease Road and Carl-Midway Church Road (Brown Bridge Road)**

Approximately 2 miles south of the existing quarry, the City of Auburn proposes to install a 0.8 MGD drinking water booster station next to an existing elevated drinking water storage tank at the intersection of Kilcrease Road and Carl-Midway Church Road (also known as Brown Bridge Road). The City also proposes to construct an additional 860 linear foot-long water main to connect the booster station to the existing system and adjacent subdivisions.

### **Proposed Water Intakes at the Mulberry and Little Mulberry Rivers**

The proposed water storage pond would partially be filled via water intakes along the Little Mulberry River (along Old Thompson Mill Road) and the Mulberry River (along Covered Bridge Road). A pump station would be installed adjacent to each water intake, and the water from these intakes would be conveyed to the raw water storage pond via an approximately 5-mile raw water transmission main.

### **Additional Project Information**

This project is a joint venture by the City of Auburn and the City of Winder to increase their water supplies. Approximately one-third of the water produced by this project would be designated to the City of Auburn, and the remaining two-thirds would be designated to the City of Winder.

The City of Auburn and the City of Winder have gone through separate environmental review processes for separate portions of the project. The proposed infrastructure adjacent to the existing quarry and at the intersection of Kilcrease Road and Carl-Midway Road are included in the City of Auburn's environmental review process. The water intakes along the Mulberry River and the Little Mulberry River as well as the 5-mile raw water transmission line were included in the City of Winder's NONSI, which was approved in 2019. These water intakes and the transmission line are included in this DRI because they are directly connected to the proposed raw water storage pond and because all new water intakes require a DRI review. The proposed water intakes from Rock Creek, the Mulberry River, and the Little Mulberry River would have a combined total capacity of 24.3 MGD (daily max, monthly average) and would not exceed an annual intake average of 9.4 MGD.

All other parts of the City of Winder's portion of the proposed project, which includes a 6.9-mile water main to transfer water from the proposed raw water storage pond to the City of Winder and upgrades to the City of Winder's water treatment plant, are not considered a part of this DRI because they do not meet DRI thresholds.

## **Current Conditions**

Currently, the site of the proposed raw water storage pond is a vacant granite rock quarry owned by the City of Auburn. The proposed water treatment plant would be located in a partially forested area to the west of the City of Auburn's Public Works Office on a parcel owned by the City. The site of the proposed drinking water booster station next to the existing elevated drinking water storage tank is currently cleared and graded. The location of the proposed Mulberry River pump station is in an agricultural area, and the location of the proposed Little Mulberry River pump station is in a forested area adjacent to the river.

## **Locations**

The proposed development would occupy property totaling 96 acres. This area includes parcels AU09 019, AU09 021, and AU11 153 and does not include the area taken up by any water mains or the water intake and pump stations at the Little Mulberry River and the Mulberry River.

The proposed raw water storage pond and water treatment plant would be located along Parks Mill Road on parcels AU09 019 and AU09 021, respectively in the City of Auburn. The proposed drinking water booster station would be installed at the intersection of Kilcrease Road and Carl-Midway Church Road on parcel AU11 153 within the City of Auburn. The proposed water mains and transmission lines would be located in both the City of Auburn and in unincorporated Barrow County. The proposed water intakes and pump stations for the Little Mulberry River and Mulberry River would be located in unincorporated Barrow County.

## **Project Timeline**

The project would be completed in one phase with an estimated completion date in December 2026.

## **Compatibility with Existing Plans**

### **Raw Water Storage Pond, Water Treatment Plant, and Water Booster Station Compatibility with Auburn's Comprehensive Plan**

The location of the proposed raw water storage pond and water treatment plant (parcels AU09 019 and AU09 021) are identified as Heavy Industrial on the City of Auburn's Future Land Use Map (dated 8/3/2023). The Heavy Industrial land use is described in the Auburn Comprehensive Plan as an area for "more intensive manufacturing and industrial operations and processes that are not public nuisances and are not dangerous to the health, safety, or general welfare of the inhabitants of the city." The location of the proposed drinking water booster station (parcel AU11 153) is identified as Agricultural on the city's Future Land Use Map. Agricultural areas are characterized as "agriculture and very low-density residential development."

The above portion of the proposed project is not technically compatible with the City's Future Land Use Map, but it will not likely pose a major issue for surrounding areas. The proposed water supply pond, water treatment plant, and associated infrastructure does not fit the "Heavy Industrial" Future Land Use characterization. However, the selected location of the water supply pond is desirable so that the city can reuse the existing rock quarry. Additionally, the proposed water treatment plant and associated infrastructure would not pose a nuisance to surrounding industrial areas, nor would surrounding industrial land uses interfere with the water treatment plant's functions. While the proposed booster pump station is not a specific use listed within its "Agricultural" land use designation, it is appropriate for the booster station to be located adjacent to the existing elevated drinking water storage tank and the neighborhoods it would be serving. Additionally, it is unlikely the booster station would have adverse effects to the agricultural character of the area in which it is proposed.

**Mulberry and Little Mulberry River Intake Compatibility with Barrow County’s Comprehensive Plan**

The Little Mulberry water intake area is identified as Rural Residential on Barrow County’s Future Development Map (dated 10/10/2023), and the Mulberry River water intake area is identified as Destination 211 on the same Future Development Map. The intent of the Rural Residential character area is to “create a transition between Rural Reserve Areas and development in Suburban Neighborhood area and maintain the existing rural character of the county”. The intent of the Destination 211 character area is to “create opportunities for employment and large-scale commercial uses that are compatible with Braselton’s growing tourism industry.”

The proposed water intakes are mostly compatible with their respective character areas. While neither character area explicitly states that water intakes or other utility facilities are desired within the character area, the Rural Neighborhood character area encourages “city or county services”, and the Destination 211 encourages “Public/institutional” future land uses. While these facilities are not explicitly encouraged in these areas, the water intakes and associated pump stations will have little impact on the surrounding area.

**Project Compatibility with Regional Plan**

The proposed water storage pond, water treatment plant, drinking water booster station, and Mulberry River water intake area are identified as “Developed” on the Northeast Georgia Regional Plan’s Regional Land Use Map (dated 6/15/2023). The Little Mulberry River water intake area is identified as “Developing” on the same map. The Regional Plan recommends development that enhances economic mobility and competitiveness, elevates public health and equity, supports and adds value to existing communities, creates housing that is diverse, adequate, equitable, and affordable, includes transportation choices and is well-connected with existing and planned transportation options, and protects natural and historic resources. The table below summarizes the project’s compatibility with these recommendations:

**Proposed Development’s Compatibility with the Northeast Georgia Regional Plan**

REGIONAL PLAN RECOMMENDATIONS	PROPOSED PROJECT’S COMPATIBILITY WITH RECOMMENDATION
<b>Enhances economic mobility and competitiveness</b>	The applicant states that the regional workforce is sufficient to meet the demand created for the proposed project.
<b>Elevates public health and equity</b>	The proposed project would provide a clean and reliable drinking water source for the City of Auburn and City of Winder, which would help elevate the public health of the communities that have access to this water. Access to clean drinking water plays a critical role in promoting the public health of communities through preventing the spread of waterborne disease, promoting hygiene and sanitation, and supporting economic development. The City of Auburn should strive to spread the benefit of this resource evenly throughout its jurisdiction.
<b>Supports and adds value to existing communities</b>	The proposed raw water storage pond reuses an existing community asset for a community need, which adds value to the community. The additional water storage capacity will provide drought resiliency for both communities. To add further value to the City of Auburn, the City should consider recreating the success of the Westside Park in Atlanta by using the site of the future raw water storage pond as a public park. This will provide additional greenspace for surrounding residents.

REGIONAL PLAN RECOMMENDATIONS	PROPOSED PROJECT’S COMPATIBILITY WITH RECOMMENDATION
<b>Creates housing that is diverse, adequate, equitable, and affordable</b>	No housing would be built as part of the proposed project. However, by increasing the water capacity, the proposed project would likely increase both cities capacity to accommodate growth pressures, which would include additional housing. The City of Auburn should use this opportunity to build additional housing that has various sizes and price point that would be affordable to people of various incomes in areas that align with its comprehensive plan.
<b>Includes transportation choices and is well-connected with existing and planned transportation options</b>	The applicant states that the proposed project would directly produce very little traffic. However, future development incentivized by this project could increase pressure on existing transportation infrastructure. The City should anticipate future population growth that this project enables and expand its transportation infrastructure appropriately.
<b>Protects natural and historic resources</b>	The applicant states that the proposed project will improve the management of the Mulberry River water supply watershed by allowing the City to withdraw water from local streams during the winter months when flows are high and reduce withdrawals in the summer months when stream flows are low. Regardless, withdrawing water from local streams can lower water levels in streams and rivers and can lead to reduced species richness and higher concentrations of pollutants in waterways. The City should be mindful of the impacts of additional water withdrawal on surrounding waterways and should consider instituting policies that help reduce its water consumption, regardless of available capacity.

**Project Compatibility with Regional Water Plan**

Barrow County lies within the Upper Oconee Regional Water Planning Region, and this region’s water plan was last updated in June of 2023. According to the Upper Oconee Regional Water Plan, the water demand in Barrow County is anticipated to increase from 7.7 MGD in 2020 to 19.7 MGD in 2060, and the county is currently permitted to withdraw 14.4 MGD (it is unknown whether this permitted amount already includes the approved Little Mulberry and Mulberry River intakes). The proposed project is compatible with the Upper Oconee Regional Water Plan. The regional water plan mentions the future challenges of surface water availability during dry years and specifically suggests quarry conversion projects as a potential solution. Additionally, the new water intakes included in this project would increase the water supply for the Cities of Auburn and Winder, which will be needed to facilitate their growing populations.

**Potential Interjurisdictional Impacts**

The applicant states that the proposed project is likely to impact the water supply watershed. The applicant provided the following statement regarding the impact of the project on the water supply watershed:

*“This project will make improvements to the management of the Mulberry River water supply watershed. As a positive impact it will provide 1.1 billion gallons of additional seasonal and drought raw water storage and 1.59 MGD of additional drinking water treatment capacity. The 1.1 billion gallons of storage allows Auburn and Winder to withdraw water from the local streams during the winter months when flows are high and reduce withdrawals in the summer months when stream flow are low. The project reduces the drinking water demands on the Upper Oconee Basin Water Authority Bear Creek reservoir and drinking water treatment plant.”*

The proposal should be designed to minimize disruption to the existing streams, associated wetlands, and floodplains to avoid future erosion, flooding, and degraded water quality onsite and downstream from the site. Low impact design measures, like bioswales, rain gardens, and other green infrastructure should be

incorporated into the project design. At minimum, the project should be in accordance with the latest edition of the Georgia Stormwater Management Manual (Blue Book) and meet all relevant EPD requirements.

The applicant states that the project is unlikely to affect any other environmental quality factors identified on the DRI Additional Form, including groundwater recharge areas, wetlands, protected mountain and river corridors, floodplains, historic resources, and other environmentally sensitive resources. The proposed water transmission line is proposed to cross the Little Mulberry River and Rock Creek in unincorporated Barrow County, but this is unlikely to have an adverse effect on either of these waterways.

The chart below summarizes the number of acres within the site area as well as within a one-mile buffer around the site that contains 1) wetlands, 2) conservation land, 3) regionally important resources, and 4) threatened regionally important resources. Please refer to the footnotes for definitions for each of these terms.

### Wetland, Conservation, and Regionally Important Resources

	AREA TYPE	AREA (ACRES)	PERCENT OF AREA
<b>SITE AREA (96 Acres)</b>	Wetland Acres <sup>1</sup>	2	2.4%
	“Conservation Land” <sup>2</sup>	44	46.2%
	Regionally Important Resource Land <sup>3</sup>	0	0.0%
	Threatened Regionally Important Resource Land <sup>4</sup>	44	46.2%
<b>1 MILE BUFFER AROUND SITE (8,995 Acres)</b>	Wetland Acres	420	4.7%
	“Conservation Land”	2,281	25.4%
	Regionally Important Resource Land	100	1.1%
	Threatened Regionally Important Resource Land	2,207	24.5%

A portion of the regionally important resource land within 1 mile of the site is part of the Northeast Georgia Green Infrastructure Network as identified in the Northeast Georgia Resource Management Plan for Regionally Important Resources (dated 8/7/2018). The Northeast Georgia Green Infrastructure Network is intended to serve as a strategically planned and managed network of wilderness, parks, greenways, conservation easements, and working lands with conservation value that benefits wildlife and people, supports native species, maintains natural ecological processes, sustains air and water resources, links urban settings to rural ones, and contributes to the health and quality of life for the communities and citizens sharing this network. No specific Regionally Important Resource sites are identified within one mile of the proposed site.

<sup>1</sup> Wetland acres are derived from the National Wetland Inventory (NWI)

<sup>2</sup> “Conservation” land is derived from the Northeast Georgia Regional Plan’s Conservation and Development Map (6/15/2023).

<sup>3</sup> Regionally Important Resources were identified as a part of the Northeast Georgia Resource Management Plan for Regionally Important Resources (2/15/2018).

<sup>4</sup> This area represents the intersection between Conservation areas (identified on the Conservation and Development Map, 6/15/2023), adopted Regionally Important Resources (RIR), and “Developed” and “Developing” Regional Land Use areas (identified on the Regional Land Use Map, 6/15/2023).

The applicant states that the proposed project would generate eight trips per day, which would include four trips during peak AM & PM hours.

The proposed project would increase drinking water capacity by 1.59 MGD for the City of Auburn and would increase the collective water storage capacity for the City of Auburn and the City of Winder by 1.1 billion gallons. Auburn's portion of the proposed project would require 3.53 additional miles of water line (1.8 miles of drinking water line, 1.73 miles of raw water line). Winder's portion of the proposed project would require 5 miles of water line to connect the Mulberry and Little Mulberry River water intakes to the RWSP. The proposed project would generate approximately 0.00034 MGD of wastewater, which would be treated using an onsite septic tank and drain field.

An estimated 14% of the site would be covered in impervious surfaces, and no infrastructure would be required to manage stormwater runoff. The applicant states that site parking lots and service roads would be paved with permeable pavers, the disturbed area of the water plant site would be 3.6 acres, and the RWSP would occupy 31 acres of the 78.66-acre property of the existing quarry. The applicant states that the RWSP would have zero (0) discharge of stormwater.

The applicant estimates the project would generate 390 tons of solid waste annually, which would mostly be from residual solids from backwashing water filters. The applicant states that sufficient landfill capacity exists to handle this waste. According to annual tonnage reports from the Georgia Environmental Protection Division, almost all municipal solid waste (MSW) generated in Barrow County is disposed of in a landfill in Barrow County. The applicant states that no hazardous waste would be generated.

The applicant estimates that the project would be worth \$28,815,354 at build-out in 2026. On a per-acre basis, the project would be worth approximately \$300,160. Due to the nature of the project, it is uncertain how much indirect tax revenue the project would generate. Prior to approval, the City should measure the life cycle costs of the proposed project and ensure that they would not be committing to more maintenance expenses than the city could cover in the future.

### **Comments from Affected Parties**

*Alan Hood, Airport Safety Data Program Manager, Georgia Department of Transportation*

This Auburn Drinking Water Supply Project in Barrow County is at least 4 miles any open to the public airport. It is located outside any FAA approach or departure surfaces, and airport compatible land use areas, and does not appear to impact any airport.

If any construction equipment or construction exceeds 200' AGL, an FAA Form 7460-1 must be submitted to the Federal Aviation Administration according to the FAA's Notice Criteria Tool found here (<https://oeaaa.faa.gov/oeaaa/external/gisTools/gisAction.jsp?action=showNoNoticeRequiredToolForm>). Those submissions for any associated cranes may be done online at <https://oeaaa.faa.gov>. The FAA must be in receipt of the notifications, no later than 120 days prior to construction. The FAA will evaluate the potential impacts of the project on protected airspace associated with the airports and advise the proponent if any action is necessary.