

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.

Project I.D.:	DRI #4640
Name of Project:	Project Orchid
Name of Host Jurisdiction:	City of Jefferson

Background

DRI review was initiated following the developer's request for rezoning, variance, and conditional use permit. Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 4/24/2026 to 5/9/2026.

Proposed Development

Patillo Industrial Real Estate is proposing to construct a 505,440-square-foot industrial building on a 158-acre site in the City of Jefferson, with the potential for future expansion to include a second industrial building. The proposed development would occupy property between Sealey Crossing Road and Rayford Wilson Road (parcel number 065 005). The DRI application says that the project would be expandable to 980,000 square feet, but the submitted site plan shows a second 505,440 square-foot building, which would bring the total to 1,010,880 square feet after the expansion.

The submitted site plan proposes 1,500 parking spaces in the initial phase and 1,567 parking spaces in the expansion, for a total of 3,067 parking spaces. The site plan also includes four 185' truck courts (two in each phase), each of which includes 13 trailer parking spaces (for a total of 52), 12 loading docks (for a total of 48), and one ramp (for a total of four). The land surrounding the parking lots and building would be steeply graded in order to level the parts of the site that would be built upon. Only one vehicular entrance is proposed for the site, from Sealey Crossing Road.

Currently, the site is mostly wooded. The site plan shows a 200-foot undisturbed buffer along the eastern boundary of the site, a 250-foot undisturbed buffer along the southern boundary, and a 100-foot stream buffer and 150-foot impervious surface buffer along all streams. However, in the first phase of development a parking lot and its surrounding grading would disturb the upstream end of one stream and its vegetated and impervious surface buffers, and in the second phase of development a parking lot and its adjacent site grading would extend into the 200-foot buffer along part of the eastern boundary. To disturb the 200-foot undisturbed buffer and the 100-foot and 150-foot stream and impervious surface buffers as proposed, the developer would need to obtain variances.

The DRI application states that the project would be completed in one phase, with an estimated completion date in 2027. However, the application and site plan both describe the proposal in terms that would indicate multiple phases, such as “initial,” “expandable,” and “at full buildout.” Most likely, the 2027 completion date refers to the initial buildout, with the potential expansion occurring at an unknown future date.

Compatibility with Existing Plans

Compatibility with Regional Plan

The site is identified as “Developing” on the Northeast Georgia Regional Plan’s Regional Land Use Map (dated 6/15/2023). 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 following table outlines the proposal’s alignment with these recommendations:

REGIONAL PLAN RECOMMENDATIONS	PROPOSED PROJECT’S COMPATIBILITY WITH RECOMMENDATION
Enhances economic mobility and competitiveness	The applicant states that the project will employ 1,500 people initially, and 3,000 at full buildout, and that the regional workforce is sufficient to fulfill the projected demand. If the future tenant provides jobs at a range of salaries and responsibilities, the project has the potential to enhance economic mobility in the area.
Elevates public health and equity	Specific details about the nature of the proposed manufacturing facility’s product or process were not provided, other than that the facility would be classified as “light industrial.” Light industrial facilities are generally defined as those that produce only low levels of noise, odor, dust, and smoke. To protect public health, it is important that any stormwater, pollutants, and waste generated at the site be properly mitigated and/or properly disposed of. When evaluating the developer’s requests for variances to reduce the required 100-ft riparian buffer and 200-ft vegetated buffer, the local government should consider whether granting either of these variances would have adverse effects upon public health or equity.
Supports and adds value to existing communities	The proposed facility would add jobs for the community. It is located in an area that has been designated by the City for industrial use, and the land north and west of it is also zoned industrial.
Creates housing that is diverse, adequate, equitable, and affordable	Not applicable for this project type.
Includes transportation choices and is well-connected with existing and planned transportation options	There is only one vehicular entrance to the site, via Sealy Crossing Road. As Sealy Crossing Road only intersects Jett Roberts Road, the proposed facility may lead to heavy traffic on Jett Roberts Road during shift changes. Additionally, the site is near the Dry Pond Road exit of Interstate 20, which already experiences congestion at times. The applicant’s estimates of peak hour traffic resulting from the proposed project are 10% of the total number of employees. While 10% of the total number of daily trips is a common method used to estimate predicted peak hour traffic, this estimate appears to include employee vehicles only. No information was provided regarding the expected number of daily or peak hour truck trips that would be generated by this facility, or whether trucks would primarily enter and exit the site during or outside of peak hours. As no traffic study has yet been completed for this project, it is recommended that a traffic study be completed to evaluate potential traffic impacts and determine whether any traffic infrastructure improvements would be needed to accommodate this project. No information was provided regarding whether alternative transportation options will be provided for employees, such as sidewalks, shuttles, or bicycle storage.

REGIONAL PLAN RECOMMENDATIONS	PROPOSED PROJECT’S COMPATIBILITY WITH RECOMMENDATION
Protects natural and historic resources	The project site is located within a drinking water watershed (See the “Natural Resources and Stormwater Management” section, below, for details). In Georgia, streams within 7 miles upstream of a drinking water intake require wider riparian vegetated and impervious surface buffers than other streams, to help protect the community’s drinking water source. Additionally, the site is within a “high priority watershed,” as designated in Georgia’s State Wildlife Action Plan (Georgia EPD, 2025). As such, the proposal’s requests to build a parking lot over part of one of the streams and to reduce stream buffer width requirements are potentially concerning.

Compatibility with Regional Resource Management Plan

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.

	AREA TYPE	AREA (ACRES)	PERCENT OF AREA
SITE AREA (158 Acres)	Wetland Acres ¹	0.8	0.5%
	“Conservation Land” ²	1.4	0.9%
	Regionally Important Resource Land ³	-	0.0%
	Threatened Regionally Important Resource Land ⁴	1.4	0.9%
1 MILE BUFFER AROUND SITE (3,561 Acres)	Wetland Acres	61.2	1.7%
	“Conservation Land”	804.7	22.6%
	Regionally Important Resource Land	-	0.0%
	Threatened Regionally Important Resource Land	799.2	22.4%

No specific Regionally Important Resource sites are identified within one mile of the proposed site.

Potential Interjurisdictional Impacts

Natural Resources and Stormwater Management

The site is within the Curry Creek Watershed, and all three streams on the site flow west or southwest towards Curry Creek. The Curry Creek watershed is classified by the State of Georgia as a Small Water Supply Water Supply Watershed. According to the site plan, the streams that flow across the northern end of the site and the southeastern corner would remain undisturbed. However, a parking lot would be built over part of the stream that originates near the center of the site and flows westward. The applicant states that an estimated 36% of the site would be covered in impervious surfaces. The site plan includes three detention or retention ponds (type unspecified) for stormwater management. 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.

¹ Wetland acres are derived from the National Wetland Inventory (NWI)

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

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

⁴ 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 project is likely to affect a water supply watershed, and that the project is unlikely to affect any of the other environmental quality factors identified on the DRI Additional Form (groundwater recharge areas, wetlands, protected mountain and river corridors, floodplains, historic resources, and other environmentally sensitive resources). Based on the NEGRC's review, the applicant's assessment of potential impacts to these environmental quality factors seems to be accurate. No information was provided about plans to mitigate potential impacts to the water supply watershed.

Transportation

No traffic study was submitted for the proposed development. The applicant estimates that the project would produce 150 a.m. and p.m. peak hour trips initially and 300 a.m. and p.m. peak hour trips at full buildout. See the table on page 2 of this report for analysis and recommendations related to traffic and transportation.

Water Supply and Wastewater

According to the applicant, the project would be served by the City of Jefferson water and sewer systems with an estimated daily demand of 0.04 MGD for each system. The applicant states that these demands can be covered by existing capacity and that no water or sewer line extensions are anticipated.

Energy

According to the applicant, the energy supply provider for this site would be Georgia Power. The project's estimated peak connected electrical load would be 8mVA at 480 VAC 60 HZ total available capacity and the project's estimated daily energy usage is 38.8 MWh/day. The applicant states that sufficient energy supply capacity is available to serve the proposed project.

Solid Waste

The applicant estimates the project would generate 860 tons of solid waste annually and 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 Jackson County is disposed of in a landfill in Banks County. The applicant states that no hazardous waste would be generated.

Lifecycle Costs and Revenues

The applicant estimates that the project would be worth between \$50 Million and \$70 million at build-out, which is approximately \$316,000 to \$443,000. It is unclear whether this estimate is based on the initial buildout in 2027, or on full buildout. The applicant states that the project is initially expected to generate no local tax revenue, which may be the case if the local government provides tax incentives to the developer. Prior to approval, the City should measure the life cycle costs of the infrastructure needed to serve this project to ensure that they would not be committing to more maintenance expenses than the new tax revenue can cover. Additionally, as they are anticipating initially collecting no local tax revenue, the City should evaluate whether the potential benefits to the community expected from this project are substantial enough to warrant the loss of tax revenue that could be generated from this site.

Comments from Affected Parties

Hunter Boyle, P.E., District 1 Traffic Operations Manager, Georgia Department of Transportation
Can a traffic impact study be provided for SR 82 at Jett Roberts Rd?

Hannah Slater, Public Development Manager, Jackson County

Regarding DRI #4640, Jackson County requests that the adjoining agricultural properties, which are currently zoned under a less intensive classification than the proposed development, be protected through the preservation of the 200-foot undisturbed buffer shown on the submitted site plan. Additionally, Jackson County requests that all state waters located on the subject property be protected and preserved to the greatest extent practicable.

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

This proposed 504,440-square foot industrial building on a 158-acre site in the City of Jefferson is less than 1 mile from the Jackson County Airport (JCA). It is located outside of the FAA approach or departure surfaces, and airport compatible land use areas, and does not appear to impact the airport as long as construction or construction equipment remains under 100' above the ground.

If any construction equipment or construction exceeds 100' 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/oe3a/main/#/noticePrescreen>). Those submissions for any associated cranes or buildings 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.

Johnny Stutzman, Wildlife Biologist, Georgia Department of Natural Resources

(see attached letter)

WALTER RABON
COMMISSIONER

CHRIS HARPER
DIRECTOR

May 8, 2026

Carol Flaute
Senior Community Planner
Northeast Georgia Regional Commission
305 Research Drive
Athens, GA 30605

Subject: Known occurrences of natural communities, plants, and animals of highest priority conservation status on or near Project Orchid in Jackson County, GA.

Dear Carol Flaute:

This is in response to your Development of Regional Impact (DRI) notification from April 24, 2026. The following Georgia natural heritage database element occurrences (EOs) were selected for the current site using the local Hydrologic Unit Code (HUC) 10 watershed for elements whose range distribution is limited by aquatic systems and within 3 miles for all other EOs:

Project Orchid (-83.578692, 34.178814, WGS84)

- GA *Cyprinella xaenura* (Altamaha Shiner) 15.1 mi NW of site in North Oconee River
- GA *Cyprinella xaenura* (Altamaha Shiner) 3.6 mi NE of site in North Oconee River
- GA *Cyprinella xaenura* (Altamaha Shiner) 8.8 mi N of site in Candler Creek
- Micropterus sp. 2 (Altamaha)* (Altamaha Bass) 15.2 mi NW of site in North Oconee River
- Micropterus sp. 2 (Altamaha)* (Altamaha Bass) 2.8 mi NE of site in North Oconee River
- Lampropeltis rhombomaculata* (Mole Kingsnake) [HISTORIC] 2.0 mi S of site
- Perimyotis subflavus* (Tricolored Bat) 0.9 mi N of site
- Perimyotis subflavus* (Tricolored Bat) 1.5 mi NE of site
- Perimyotis subflavus* (Tricolored Bat) 2.5 mi NE of site
- Condylura cristata* (Star-nosed Mole) [HISTORIC] in vicinity of site**
- Tyto furcata* (American barn owl) [HISTORIC] 1.2 mi SE of site
- Southern Conservation Trust Easement 0.9 mi NW of site
- Hurricane Shoals Park 2.2 mi NE of site
- Lamar Murphy Park 1.8 mi SE of site
- City of Jefferson Lake
- ORLT Easement 2.7 mi SW of site
- Greenspace program acquisition 2.9 mi NE of site
- North Oconee River 2 (0307010104) [SWAP High Priority Watershed]**

Recommendations:

Species proposed for federal listing have been documented within three miles or within the watershed(s) of the proposed project. To minimize potential impacts to species proposed for listing, we recommend consultation with the United States Fish and Wildlife Service (USFWS). Please email GAES_Assistance@fws.gov for project consultation and survey recommendations. For more information on the project consultation process, please visit <https://www.fws.gov/office/georgia-ecological-services/project-planning-review>.

Please be aware that state protected species have been documented near the proposed project. For information about these species, including survey recommendations, please visit our webpage at <http://georgiawildlife.com/conservation/species-of-concern#rare-locations>.

The following biologists can provide additional recommendations and assistance regarding the following groups:

Plants: Lisa Kruse (Lisa.Kruse@dnr.ga.gov)

Fishes: Tiffany Penland (Tiffany.Penland@dnr.ga.gov)

Crayfish & Mussels: Matt Rowe (Matthew.Rowe@dnr.ga.gov)

Reptiles & Amphibians: Daniel Sollenberger (Daniel.Sollenberger@dnr.ga.gov)

Mammals: Trina Morris (Katrina.Morris@dnr.ga.gov)

Inland Birds: Todd Schneider (Todd.Schneider@dnr.ga.gov)

Shore & Water Birds: Fletcher Smith (Fletcher.Smith@dnr.ga.gov)

Terrestrial Invertebrates: Anna Yellin (Anna.Yellin@dnr.ga.gov)

Species listed above that have no “GA” or “US” status are considered Georgia species of concern. Locations of these species are tracked until enough information is gathered to determine if they should be added to the state list or if their populations do not warrant tracking. It is important to consider these species when planning projects. Please let us know if you have any questions regarding Georgia species of concern.

Please note that the tricolored bat (*Perimyotis subflavus*) was proposed for listing under the Endangered Species Act (ESA) on September 14, 2022, by the United States Fish and Wildlife Service. We recommend consultation with the United States Fish and Wildlife Service for this species in anticipation of the species being listed as endangered under the ESA.

We have the following recommendations for the applicant to consider. We are concerned about streams and other sensitive habitats that could be impacted by the proposed project. We recommend that stringent erosion control practices be used during construction activities and that vegetation is re-established on disturbed areas as quickly as possible. Silt fences and other erosion control devices should be inspected and maintained until soil is stabilized by vegetation. Please use natural vegetation and grading techniques (e.g. vegetated swales, turn-offs, vegetated buffer strips) that will ensure that the project site does not serve as a conduit for stormwater or pollutants into the watershed during or after construction. These measures will help protect water quality near the project as well as in downstream areas.

To protect aquatic habitats and water quality, we recommend that all machinery be kept out of streams. Further, we strongly advocate leaving vegetation intact within 100 feet of streams, which will reduce inputs of sediments, assist with maintaining streambank integrity, and provide shade and habitat for aquatic species. Please be aware that the type of erosion control and/or soil stabilization material used during construction can impact wildlife. We strongly recommend using natural, biodegradable materials such as 'jute' or 'coir'. Mesh strands should be movable, as opposed to fixed. Use of plastic netting or fencing frequently leads to wildlife entrapment and death.

Commercial facilities often require landscape conversion to a form that cannot support the habitat needs of many species. Large commercial developments lead to fragmentation of natural landscapes, which in turn negatively affects Georgia species of conservation concern. This includes federally endangered and candidate species such as the tricolored bat. We recommend completing surveys for species of concern before any construction or land clearing activities begin. We also urge you to consider preserving this site for conservation since it remains undeveloped. Contiguous, undeveloped habitats are crucial for wildlife conservation. Please visit our website at www.georgiawildlife.com for more information on conservation opportunities in the state.

We advocate green growth, which focuses on environmentally sustainable development and leaving open space in newly developed areas. By clustering development and minimizing infrastructure, such as paved surfaces and utilities, conscientious design can help protect natural habitats from fragmentation and habitat degradation. Development should occur away from sensitive environmental resources. Undisturbed buffers of at least 100 feet should be left surrounding any streams or wetlands at the site. We recommend that open greenspace be protected by use of a conservation easement or other legal agreement. The open space may be used for recreation, wildlife habitat, and/or stormwater control, and native vegetation should be incorporated or preserved. We recommend these developments set aside as much land as possible to remain in a natural state. This will allow for the conservation of wildlife and natural resources as well as recreation opportunities for residents of the planned development and surrounding communities. For more information on Green Growth Guidelines, please visit the Georgia DNR Coastal Resources Division website (<https://coastalgadnr.org/GGG>).

We recommend utilizing native vegetation or grass mixes where possible. The use of native vegetation in such instances provides potential wildlife habitat, improves stormwater management in the form of erosion control, and reduces the cost of maintenance for the facility. Additionally, security fencing can create a barrier to wildlife movement. We also recommend that security fences be constructed with wildlife-permeable fencing, such as welded wire with larger holes that smaller animals can pass through, or that the fencing include intermittent small gaps at the bottom of the fence to allow for wildlife movement. Planting a native hedgerow outside the security fence is another option to consider; this would increase security value and provide a visual barrier while providing habitat for wildlife. At a minimum, please implement best management practices (BMPs) endorsed by the State of Georgia for erosion, sediment, and stormwater control throughout the site during and after construction.

We encourage the applicant to consider deer-friendly fencing along residential or commercial property perimeters, especially in urban areas. Decorative wrought iron fencing often poses

unintended threats to wildlife. In the metro-Atlanta area alone, there are approximately 60-100 deer deaths per year due to this type of fencing. Deer attempt to scale the fencing or fit through the fence posts, resulting in entrapment or fatal injuries on the fence. Security fencing that incorporates barbed wire can also cause injury when scaled. Most animals caught in fencing, regardless of the fencing type, either die or must be euthanized.

For further information, several western states have published guidance on wildlife-friendly perimeter fencing that includes sections on residential fencing, such as this webpage from the Utah Division of Wildlife Resources: <https://wildlife.utah.gov/news/wildlife-blog/1938-wildlife-friendly-fences.html>.

It is believed that the second greatest cause of direct mortality of birds is collision with building glass. Bird mortality from window strikes is [estimated at more than one billion birds every year in North America](#), with between 365 million to 988 million occurring annually in the United States. Approximately 56% of collision mortality occurs at low-rise buildings (i.e., one to four stories), at both urban and rural developments. These mortality rates can be minimized by implementing simple, cost-effective measures such as designing facilities with a reduced window-to-wall ratio or installing glass treatments at existing facilities (see the following USFWS publication: <https://www.fws.gov/media/methods-reduce-bird-collisions-glass-when-remodeling-and-designing-new-facilities>). For more information and links, please visit the following website: <http://www.fws.gov/birds/bird-enthusiasts/threats-to-birds/collisions/buildings-and-glass.php>.

This project occurs within a high priority watershed(s). As part of Georgia's State Wildlife Action Plan, high priority watersheds were identified to protect populations of high priority aquatic species, important coastal habitats, and migratory corridors for anadromous species. Please refer to the [Georgia Wild Hub - State Wildlife Action Plan](#) to review the [High Priority Watershed Viewer](#) and find out more specific information about the listed high priority watershed(s).

Disclaimer:

Please keep in mind the limitations of our database. The data collected by the Wildlife Conservation Section comes from a variety of sources, including museum and herbarium records, literature, and reports from individuals and organizations, as well as field surveys by our staff biologists. In most cases the information is not the result of a recent on-site survey by our staff. Many areas of Georgia have never been surveyed thoroughly. Therefore, the Wildlife Conservation Section can only occasionally provide definitive information on the presence or absence of rare species on a given site. Our files are updated constantly as new information is received. **Thus, information provided by our program represents the existing data in our files at the time of the request and should not be considered a final statement on the species or area under consideration.**

If you know of populations of highest priority species that are not in our database, please fill out the appropriate data collection form and send it to our office. Forms can be obtained through our website (<http://georgiawildlife.com/conservation/species-of-concern#rare-locations>) or by contacting our office. If we can be of further assistance, please let us know.

Sincerely,

A handwritten signature in black ink that reads "Johnny Stutzman". The signature is fluid and cursive, with the first name being larger and more prominent than the last name.

Johnny Stutzman, Wildlife Biologist
Johnny.Stutzman@dnr.ga.gov, 706-318-3296

Data Available on the Wildlife Conservation Section Website

- Georgia protected plant and animal species profiles are available on our website. These profiles cover basics such as species physical descriptions, preferred habitat, and life history, as well as threats, management recommendations, and conservation status. To view these profiles, visit: <http://georgiawildlife.com/conservation/species-of-concern#rare-locations>
- Rare species and natural community information can be viewed by Quarter Quad, County, and HUC 8 Watershed. To access this information, please visit our GA Rare Species and Natural Community Information page at: <http://georgiabiodiversity.org/>
- Downloadable files of rare species and natural community data by Quarter Quad and County are also available at: https://www.georgiabiodiversity.org/portal/additional_data_resources