

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 #3082
Name of Project:	Bana 85 Commerce Center
Name of Host Jurisdiction:	City of Commerce

Background

DRI review was initiated following the developer’s request for permits from the City of Commerce. Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 03/03/2020-03/18/2020.

Proposed Development

Rooker is proposing construction of a master-planned industrial park comprised of 10 buildings on 635 acres on SR 98 in the City of Commerce and unincorporated Jackson County. (The City of Commerce will be annexing the unincorporated land as part of the project.) The buildings will likely serve as warehouses along the Interstate 85 corridor at Exit 147 (SR 98/Commerce/Maysville). Each building will come with dedicated parking for cars and tractor-trailers, and at least one stormwater detention pond per building. The project will total 6,136,957 million sq. ft. of industrial space, 2,449 tractor-trailer parking spaces, and 2,908 employee parking spaces. A new road will be constructed to serve the site. The project will be completed in two phases. Phase One will be completed in 2024 and Phase Two will be completed in 2029. Currently, the site is undeveloped with a mix of wooded and open areas.

Compatibility with Existing Plans

The Commerce Character Area Map (dated 10/5/2015) identifies the site as “Industrial Workplace,” which is typically truck-oriented and located along major roads and highways. Manufacturing, industrial, storage, and warehousing are listed as primary land uses in this character area.

The Jackson County Character Area Map (dated 12/29/2017) identifies the site as “Urban” and lists Industrial uses as “permitted and encouraged in locations per plan.” The Urban Character area includes the following principles and quality community objectives and expectations: Transportation Alternatives are “required based on opportunities” and the Jobs-Housing Relationship will be “usually imbalanced in favor of employment;” the overall building pattern should be “concentrated and diverse,” with mandatory stormwater management and off-street parking; and the automobile is expected to be the primary mobility option, although, sidewalks are strongly encouraged, if not required.

General land use policies for Jackson County include the efficient use of land, avoiding excessive burdens on public facilities and harsh transitions between land uses, as well as the coordination of land use and transportation decisions and a preference for sustainable development. Given the need to extend water and sewer service to this site as well as the lack of transportation options, the location of this project may be inconsistent with the comprehensive plan.

The Jackson County 2040 Future Land Use Map (dated 12/29/2017) designates much of the land around Highway 98 for industrial development, including the portion of this site located in the unincorporated county. Industrial land use policies include: placing the development in appropriate locations (level topography, adequate water and sewer access, and access to arterial streets), favoring low-impact industry, using campus designs for industrial parks that include generous setbacks and landscaping, maintaining a 50 ft. undisturbed buffer between any development and I-85, and limiting impervious surfaces to 60% of the site. The Site Plan does not show whether the 50-foot buffer along Interstate 85 will be maintained. The protection of this buffer should be verified before approval of the project.

The site is identified as “Developed” on the Northeast Georgia Regional Plan Update 2018 (Regional Plan) Regional Land Use Map (dated 6/7/2018). One Regionally Important Resource is located within one mile of the proposed site: Hurricane Shoals Park. According to the Regional Plan, the site falls within the Rapid Development category of Areas Requiring Special Attention. The desired development pattern in this area includes multi-modal streets and transportation options, shared parking, landscaping of parking areas to minimize stormwater and heat island effects, compact development that makes efficient use of infrastructure, proper management of sensitive environmental areas like wetlands, and the encouragement of industries that are suitable for the community. There are potential inconsistencies between the Regional Plan and the proposed development, including a lack of transportation options, significant stormwater and heat island effects, and excessive parking. Considering the potential for this project to become a major employment hub, Rooker, the City of Commerce, and Jackson County may want to consider building this site with the potential for transit access in mind. Shrinking the size of parking lots would decrease the volume of runoff and the large roofs of these buildings could be fitted with solar panels to offset the environmental disturbance created by the site. Given the scale of the site and the location adjacent to a Regionally Important Resource, stormwater management above and beyond state and local minimums is strongly recommended.

Potential Interjurisdictional Impacts

The applicant states that the project will impact nearby wetlands and historic resources, but is unlikely to affect other environmental quality factors identified on the DRI Additional Form, including water supply watersheds, groundwater recharge areas, protected mountains and river corridors, floodplains, and other environmentally sensitive resources. Mitigation of any potential negative impacts to the nearby wetlands and historic resources should be required.

The National Wetland Inventory (NWI) identifies seven onsite wetlands, totaling approximately 40 acres associated with Gravelly Creek. A total of 49 wetlands totaling 218 acres are located within one mile of the site. The Northeast Georgia Regional Plan Update 2018 Conservation and Development Map (dated 7/19/2018) identifies 34 "Conservation" areas totaling 3,254 acres within one mile of the site including 263 acres onsite. Given the extensive amount of wetland and conservation areas in proximity to the site, stormwater management will likely need to go above and beyond state and local minimum standards.

Gravelly Creek and its associated floodplains and wetlands flow through the middle of the property in a southerly direction between the projected Phase One and Phase Two sites. No construction is proposed within a floodplain. However, Building Site 3 and Site 4 will be built in very close proximity to the floodplains and wetlands along Gravelly Creek. The future Bana Road will cross the creek; specific engineering designs were not provided. Two streams branch off to the north from Gravelly Creek and both form boundaries to development on Site 3 and Site 1. The Site Plan does not identify the dimensions of stream buffers nor whether any of the land will remain undisturbed by construction. The developer will apply for an Army Corps of Engineers' 404 Individual Permit "if environmental impacts are expected." While impervious surfaces are only projected to cover 35% of the site, the mass grading required to build this project could create serious stormwater impacts on Hurricane Shoals Park and nearby conservation and wetland areas.

A&R Engineering completed a traffic study on December 5th, 2019 for the project. The study estimates peak hour vehicle trips at 787 in the morning peak and 792 in the afternoon peak. The study recommends a new traffic signal at the I-85 southbound ramp if a full signal warrant study finds a signal is necessary. Otherwise, no improvements to existing infrastructure are recommended. A new 2-lane road (Bana Road) will provide access to the property from SR 98 and will be extended to Wheeler Lane during Phase Two. The study recommends one entrance and two exit lanes onto SR 98, as well as a dedicated left-turn bay and deceleration lane on SR 98. Phase Two would eliminate Wheeler Cemetery Road between Wheeler Lane and Hurricane Shoals Park Road. This extension will cut off access to the Mountain Stream Saddle Club and to Edwin Reynolds Road. The Site Plan does not show how access will be restored.

The project would be served by the City of Commerce's water and sewer systems with an estimated daily demand of .15 MGD for each system. These demands can be covered by existing capacity. A water line extension of 1.5 miles and a sewer line extension of 2.1 miles will be required.

An estimated 35% of the site will be covered in impervious surfaces and 13 stormwater detention ponds are proposed to handle stormwater runoff. The application also mentions that buffers will be used to mitigate the impacts of stormwater, but the Site Plan does not show where these buffers would be located nor does it identify proposed minimum buffer widths. As mentioned previously, stormwater management facilities should exceed state and local minimums given the potential for significant adverse impact to Hurricane Shoals Park and the extensive acres of conservation and wetland areas that are nearby.

Estimates expect the site to generate over three million dollars per year in tax revenue, but, when measured on a per-acre basis, the project only generates approximately \$4,724 per-acre. It is entirely possible that this project will create more long-term expenses in the form of public infrastructure and service delivery costs than it generates in tax revenue. The costs of maintaining public infrastructure throughout its life cycle should be calculated and weighed against the projected revenue generated by the project to ensure that the City of Commerce does not commit more resources to servicing the property than they receive in tax revenue.

Comments from Affected Parties

None received.