

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 #3089
Name of Project:	Haggard Road Industrial
Name of Host Jurisdiction:	City of Commerce

Background

DRI review was initiated following the developer's request for rezoning and annexation, submitted to the City of Commerce. Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 3/30/2020-4/14/2020.

Proposed Development

Southern Real Estate Holdings, LLC is proposing to construct a 550,000 sq. ft. warehouse on 43 acres at 339 Haggard Road (Land lot 019, Parcels 002 and 002C), near Interstate 85 and the Tanger Outlet Mall, within the City of Commerce and unincorporated Jackson County. The City of Commerce plans to annex the portion of the property that sits in unincorporated Jackson County. In addition to the warehouse, a parking lot, truck trailer parking, and stormwater retention pond will be constructed. Currently, the site is undeveloped and wooded.

Compatibility with Existing Plans

The site does not appear on Commerce's Recommended Character Areas Map (dated 10/16/2015). However, the Map does envision industrial and highway-commercial uses for the land adjacent to this site, and an additional industrial project would not be out of character. The City of Commerce should examine the proposed project's compatibility with the adjacent Character Areas and nearby existing development within the city when considering approval of the requested annexation and rezoning.

The site is identified on Jackson County's Character Area Map (dated 11/20/2017) as part of the Urban Character Area. It is also labeled as a Commercial use on the Future Land Use Map. According to Jackson

County's Comprehensive Plan, industrial uses are encouraged within this area provided they are connected to water and sewer service. The Comprehensive Plan states that the automobile is anticipated to be the primary mobility option and engineered stormwater management is required for these areas. In addition, the plan calls for impervious surfaces that cover no more than 60% of the site. Generally, development should make efficient use of land and infrastructure without placing undue stress on public services. Industry should be limited to areas with access to public water and sewer service as well as arterial roads. The proposal appears generally consistent with the Jackson County Comprehensive Plan; however, it lacks the recommended level of road access: Haggard Road is currently an unpaved road and intersects with two-lane Ridgeway Church Rd. The City of Commerce should evaluate the infrastructural improvements needed to serve the site and the proposal's consistency with the Jackson County Comprehensive Plan when considering the requests for annexation and rezoning.

The site is identified as "Developed" on the Northeast Georgia Regional Plan Update 2018 Regional Land Use Map (dated 6/7/2018). No Regionally Important Resources are identified within one mile of the proposed site. The site also sits within the Rapid Development corridor along I-85. This is an Area Requiring Special Attention as noted on the Areas Requiring Special Attention Map (dated 6/7/2018). The NEGRC recommends that development within these areas makes efficient use of infrastructure, uses low-impact development techniques, and is built with multiple transportation options in mind. The current proposed development is not consistent with those recommendations. To improve consistency with the regional recommendations, bicycle/pedestrian infrastructure should be incorporated, where feasible, particularly along Haggard Road; local and regional bicycle/pedestrian/trail plans should be investigated to identify opportunities for future connections. Bioswales, drainage ditches, and other green infrastructure alternatives to traditional curb and gutter systems should be considered as well. As detailed below, proper stormwater management should be used to reduce the environmental impact of the project.

Potential Interjurisdictional Impacts

The applicant states that the project is unlikely to affect any of the environmental quality factors identified on the DRI Additional Form, including water supply watersheds, groundwater recharge areas, wetlands, protected mountain and river corridors, floodplains, historic resources, and other environmentally sensitive resources.

The National Wetland Inventory (NWI) identifies 66 acres of wetlands within one mile of the site. The Northeast Georgia Regional Plan Update 2018 Conservation and Development Map (dated 7/19/2018) identifies 38.5 acres as "Conservation" within one mile of the site.

The applicant is in the process of generating trip estimates for surrounding streets, but has estimated that 70 and 71 trips will occur during the morning and afternoon peak hours, respectively. Anticipated transportation improvements include widening and paving Haggard Road to accommodate increased truck traffic. Expansion of infrastructure may conflict with the Regional Plan's recommendation to make efficient use of existing infrastructure in this area.

The project would be served by the City of Commerce's water and sewer systems with an estimated daily demand of .025 MGD for each system. These demands can be covered by existing capacity. A water line extension of .16 miles and a sewer line extension of .14 miles will be required to serve the site.

Approximately 50% of the site will be covered in impervious surfaces and a large retention pond will be constructed to manage stormwater. A 50 ft. buffer will be maintained around the entire site. At minimum, all

state and local regulations concerning stormwater management should be complied with and the project should be in accordance with the Georgia Stormwater Management Manual, 2016 Edition.

The applicant estimates the project will generate 15 tons of solid waste annually and that sufficient landfill capacity exists to handle this waste.

The developer estimates that the project will be worth \$25 million at completion and will generate \$350,000 annually in tax revenue. However, when measured on revenue-per-acre, the property yields a modest \$8,140 per acre. This may not be enough to cover the expense of maintaining the infrastructure that is serving the site, especially if the City is also responsible for providing that infrastructure expansion. The City of Commerce should identify whether the project's demand on infrastructure and public services will exceed tax revenue from this proposal over the life cycle of the infrastructure and consider that information prior to approval of the submitted requests.

Comments from Affected Parties

Justin Crighton, Jackson County

Jackson County Public Development has reviewed the proposed development on Haggard Rd submitted as DRI 3089 and has the following comments:

- In order to serve the transportation needs of this development we request that Haggard Rd. be upgraded to meet or exceed the standards set forth in the most recent version of the Unified Development Code, [specifically, standard detail T-05 found in Article 23](#), along the entire road frontage of the proposed developments' parcel.

Shane Giles, Georgia Department of Transportation

Below are comments from Georgia Department of Transportation:

- The Developer needs to coordinate with the GDOT project 0015670 (Project Manager is Heidi Schneider at 678-518-3677 or email HSchnider@dot.ga.gov) to determine if any impacts will occur due to the development project, if so then the developer will need to address
- The Developer needs to determine if any impacts will occur at the intersection of SR 98 and Steve Reynold from there proposed development and if any improvement are needed will need to be constructed
- Looking at the overall site plan, the developer needs to ensure that the roadway that the driveway is connecting to it is not within limited access right of way for I-85. If it is, the driveway will need to be relocated



April 13, 2020

Stephen Jaques
Northeast Georgia Regional Commission
305 Research Drive
Athens, Georgia 30605-2795

Re: Development of Regional Impact- Haggard Road Industrial (DRI# 3089)

The Gwinnett County Department of Planning and Development has reviewed the Regional Review Notification (Review) prepared by the Georgia Mountains Regional Commission regarding the proposed industrial development located at 389 Haggard Road (Land lot 019, Parcels 002 and 002C), within the City of Commerce, in Jackson County, Georgia. The proposed development consists of an approximately 43-acre site located at Haggard Road adjacent to Interstate 85. The site is currently undeveloped and wooded.

PROPOSED DEVELOPMENT

The applicant proposes to construct a 550,000 sq. ft. warehouse, parking lot, truck trailer parking, and stormwater retention pond. There will be a total of 176 parking spaces. The City of Commerce will annex the portion of the property that is in unincorporated Jackson County.

The anticipated completion of the project is December 2022.

COMPATIBILITY WITH EXISTING PLANS

According to City of Commerce's Comprehensive Plan 2015 Update the site is not zoned but labeled unincorporated County parcels. The Jackson County 2040 Comprehensive Plan, adopted August 11, 2015, defines the project development as an Urban Character Area. On the Jackson County Future Land Use Map, the project area is identified as Commercial. This aligns with the proposed industrial development.

According to the Northeast Georgia Regional Plan (2018) this site sits within the Rapid Development corridor and is considered part of the Area Requiring Special Attention. The Northeast Georgia Regional Commission recommends that development within these areas make efficient use of infrastructure, use low impact development techniques and implement multiple transportation options.

NATURAL AND CULTURAL RESOURCES

On the Northeast Georgia Regional Plan are areas identified as Conservation which includes Regionally Important Resources, wetlands, riparian areas, and groundwater recharge areas. According to the Review, the project is not likely to affect water supply watersheds, groundwater recharge areas, wetlands, protected mountain and river corridors, floodplains, and other environmentally sensitive resources. No Regionally Important Resources were identified within one mile of the proposed site.

INFRASTRUCTURE

Transportation

According to the Review, it is estimated that there will be 70 AM trips and 71 PM trips and a final traffic estimate is underway. Haggard Road is currently a dirt road and will be paved and widened for this proposed development.

The amount of truck traffic may have a significant impact on Gwinnett County as the trucks may proceed south along I-85 and proceed through Gwinnett County.

Water Supply and Wastewater

According to the Review, the project will be served by the City of Commerce's water and sewer systems with an estimated daily demand of .025 MGD for each system. Existing capacity can fulfill these demands. A water line extension of .16 miles and sewer line extension of .14 miles will be required to serve the site.

No comment as the proposed development is outside of Gwinnett County's service area.

Stormwater Management

According to the Review, 50% of the site will be covered in impervious surfaces and a large retention pond will be constructed to manage stormwater. A 50ft. construction buffer is recorded on the submitted site plan and there are no specific details on the stormwater pond.

Gwinnett County recommends that all work at a minimum be in accordance with the Georgia Stormwater Management Manual 2016 Edition. Additionally, the designated Stream Buffer Protection area and Best Stormwater Management Practices should diminish the impacts on stormwater management.

SERVICES

The applicant estimates there will be 15 tons of solid waste from the site and existing landfill space can accommodate this amount.

Solid Waste

No comment.

Gwinnett County appreciates the opportunity to comment on this proposed development, and sincerely hopes that these comments will be given full consideration as the review process moves forward. Please feel free to contact me if you have any questions regarding Gwinnett County's position on this issue.

Best regards,



Dan Reuter, Deputy Director
Gwinnett County Department of Planning and Development