



DEVELOPMENTS OF REGIONAL IMPACT

Final Report

Northeast Georgia Regional Commission • 305 Research Drive, Athens, Georgia • www.negr.org

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 #3234
Name of Project:	Dakota Commerce
Name of Host Jurisdiction:	City of Commerce

Background

DRI review was initiated following the developer’s request that the property be annexed into, and rezoned by, The City of Commerce. Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 01/14/21-01/29/21.

Proposed Development

Dakota Commerce LLC is proposing construction of a build-to-suit industrial site consisting of two industrial/warehouse buildings (approximately one million square feet each) on a 195-acre site bordered by Ridgeway Church Road, Yarbrough Ridgeway Road, and Hardman Orchard Road in unincorporated Jackson County (parcel numbers: 005, 005B, 008B, 010A, 010B, 010C, and 018). The site also includes four contiguous Flex Areas that would be suitable for future construction. Additionally, seven stormwater detention ponds, 336 trailer parking spaces, and 427 vehicle parking spaces would be constructed. The project would be completed in one phase with an estimated completion date in December 2024. Currently, the site is comprised of fields, scattered woodland, and several houses with aging agricultural outbuildings.

Compatibility with Existing Plans

The site is not identified in the City of Commerce’s Comprehensive Plan because the properties are not currently within the city. That said, the Plan does encourage industrial development along the I-85 Corridor. The Plan also states that the City would develop a policy to govern annexation. After further discussion, the City has decided that annexation is generally in its best interests to raise the tax base and add more utility customers.

The site is identified as “Industrial” on the Jackson County Comprehensive Plan’s Future Land Use Map (dated 12/07/20), and is identified as “Urban” on the Plan’s Character Area map (dated 12/07/20). Industrial development is permitted and encouraged in these areas. Generally, Jackson County’s Plan states that development should be compatible with adjacent properties, avoid placing undue stress on public facilities, screen negative views through site planning, architectural, and landscape devices, avoid sprawl, and coordinate land-use decisions between the County and municipalities in annexation cases. Specifically, the Plan states that industrial development should be limited to relatively flat land in places with adequate infrastructure, impervious surfaces should not exceed more than 60% of the site, heavy industry should not be placed next to housing, and prime industrial sites with public infrastructure should be reserved for “high employment-generating uses.” The Jackson County Plan also states that, “Land use decisions made by municipalities at the time of annexation should respect and be consistent with the character and future land use plans previously approved by Jackson County. Municipalities should anticipate formal objections by the County when annexations are for zoning and development inconsistent with the County’s Comprehensive Plan.” The applicant did not provide employment projections for the proposed project nor did they identify whether the City has received formal objections or support from Jackson County (neither required for DRI review). Jackson County did not submit comments during this DRI review. The City should evaluate the employment potential of the project prior to approval. Based on the current application, the project appears consistent with the local comprehensive plans.

The site is identified as “Developed” on the Northeast Georgia Regional Plan’s Regional Land Use Map (dated 6/7/2018). The Regional Plan recommends supporting economic development that matches the region’s workforce and prices in the cost of infrastructure over its lifecycle, encourages and compliments existing and planned transportation options—especially those that consider non-automobile transportation modes, and builds a compact development pattern on existing infrastructure. No Regionally Important Resources are identified within one mile of the proposed site. If this project would generate significant jobs, the City and County are encouraged to improve multi-modal access to the site to reduce the need for automobile-based commuting. The City is also encouraged to examine the long-term effects of increased truck traffic on adjacent public roadways and work with the developer to ensure adequate road and curb and gutter improvements are made to support the project.

Potential Interjurisdictional Impacts

The applicant states that the project would likely impact wetlands. They indicated that none of the other environmental quality factors identified on the DRI Additional Form, including water supply watersheds, groundwater recharge areas, protected mountain and river corridors, floodplains, historic resources, and other environmentally sensitive resources would be affected. The site plan shows multiple stream segments, with adjacent wetlands, running diagonally through the middle of the site. The site plan shows what could be buffer areas along the streams; however, no legend, notation, or labels identify them as buffers or areas to be protected. As designed, both buildings encroach upon existing stream segments and a portion of one of the wetlands onsite (see intersections between proposed Building 200 and stream (southwest) and Building 100 and stream/wetland (north) on the submitted site plan). The applicant did not submit any information regarding a mitigation plan, requested variances, or a Georgia Environmental Protection Division (EPD) review.

An estimated 49% of the site would be covered in impervious surfaces, and seven retention ponds are planned to manage stormwater runoff. The proposal should be designed to minimize disruption to the existing streams and associated wetlands to avoid future erosion, flooding, and degraded water quality onsite and downstream from the site.

The National Wetland Inventory (NWI) identifies seven acres of wetlands onsite and 63 acres of wetlands within one mile of the site. The Northeast Georgia Regional Plan's Conservation and Development Map (dated 7/19/2018) identifies four acres of "Conservation" land onsite and 39 acres of "Conservation" land within one mile of the site. This acreage is part of the Northeast Georgia Green Infrastructure Network, as identified in the Northeast Georgia Resource Management Plan for Regionally Important Resources.

The proposed project deviates from best management practices for stream protection and stormwater management and may result in costly impacts to public infrastructure, including the stormwater system and roadways. At minimum, the project should be in accordance with the latest edition of the Georgia Stormwater Management Manual (Blue Book) and meet all EPD requirements.

NV5 Engineers and Consultants Inc. prepared a traffic impact study, which estimates the project would generate a total of 2,938 trips per day, including 245 during the AM peak hour and 248 during the PM peak hour. The study estimates that an average of 1,172 of those daily trips would be truck traffic. The site plan shows three driveways would be constructed. The study recommends a left-turn lane for Driveway 1 on Ridgeway Church Road, a right-turn and left-turn lane for Driveway 2 on Ridgeway Church Road, and no improvements for Driveway 3 on Hardman Orchard Road. These roads are best described as typical country two-lane roads designed for low levels of traffic. Significant growth of new truck traffic would likely decrease the lifespan of these roads. The increased life cycle costs of roadway maintenance should be factored into the approval decision to ensure the new tax revenue can sustain the associated maintenance costs.

The project would be served by the City of Commerce's water and sewer systems with an estimated daily demand of 0.031 MGD for each system. The applicant states that these demands can be covered by existing capacity. A sewer line extension of 0.4 miles would be necessary to serve the site. Prior to approval, the City of Commerce should compare this proposal's expected return in tax revenue to the projected maintenance expenses for the new required infrastructure to ensure tax revenue will be sufficient to maintain the associated infrastructure.

The applicant estimates the project would generate 10 tons of solid waste annually and that sufficient landfill capacity exists to handle this waste. No hazardous waste would be generated.

The applicant estimates that the project would be worth \$80 million at build-out and generate over \$1 million in local tax revenue per year. On a per-acre basis, the project would be worth an estimated \$374,000 and generate approximately \$4,700 in tax revenue. Before approving this project, the City should measure the life cycle costs of the infrastructure necessary to serve this project to ensure that they would not be committing to more maintenance expenses than the new tax revenue can cover.

Comments from Affected Parties

Jonathan Peevy, P.E. Assistant District Traffic Engineer, Georgia Department of Transportation

Looking at this proposal, they should include impacts to state route intersections. For example, Steve Reynolds at SR 98, Yarborough Ridgeway at SR 98 or even Tanger Blvd at SR 15. This is where the trucks will be entering the highway to access the interstate.

Cyndi Sloan, Planning Division Director, Gwinnett County Department of Planning and Development
(see attached)

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

The proposed development is approximately 6 miles from Jackson County Airport (LCA). It is located outside any FAA approach or departure surfaces, and airport compatible land use areas, and does not appear to impact the airport.

However, if any construction equipment reaches 200' above ground or higher, an FAA Form 7460-1 must be submitted to the Federal Aviation Administration. That may be done online at <https://oeaaa.faa.gov>. The FAA must be in receipt of the notification, no later than 120 days prior to construction. The FAA will evaluate the potential impact of the project on protected airspace associated with the airports and advise the proponent if any action is necessary.

Thank you for the opportunity to comment on the proposed development.



January 28, 2021

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Re: Development of Regional Impact- City of Commerce (DRI# 3234)

The Gwinnett County Department of Planning and Development has reviewed the Regional Review Notification (Review) prepared by the Northeast Georgia Regional Commission regarding the proposed construction of a build-to-suit industrial site comprised of two buildings and future building sites. This process was initiated due to a request for annexation and a rezoning amendment from A-2 to M-2.

The following comments are offered:

INFRASTRUCTURE

Transportation

According to the traffic impact study provided by NV5, the project will generate a total of 2,938 trips per day. The study estimates that 1,172 of those daily trips would be truck traffic.

This large amount of truck traffic will have a significant impact on Gwinnett as the trucks may travel south along I-85 and proceed through Gwinnett County. On the site plan there was no indication of overnight truck parking at the facility. Therefore, raising the concern for the 336 trailer parking spaces that are proposed for the project.

Gwinnett County Department of Transportation has no comment on this DRI.

Water Supply and Wastewater

The proposed project is located within the Jackson County service area; therefore, Gwinnett County Department of Water Resources does not have any comments on water or sewer.

Stormwater Management

Gwinnett County recommends that all work at a minimum be in accordance with the Georgia Stormwater Management Manual 2016 Edition.

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,

Cyndi Sloan, Planning Division Director
Gwinnett County Department of Planning and Development