

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 #3240
Name of Project:	Stanton Springs
Name of Host Jurisdiction:	Newton, Walton, and Morgan Counties

Background

DRI review was initiated following the Joint Development Authority (JDA) of Jasper, Morgan, Newton, and Walton Counties’ request for permits from Morgan, Walton, and Newton Counties. Morgan County is the submitting entity for this DRI review, due to the largest portion of the proposed project being located within that jurisdiction. Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 01/29/21 – 02/13/21.

Proposed Development

The JDA has submitted a master plan for an expansion of the Stanton Springs Industrial Park. The project is an expansion of DRI# 231, Stanton Springs, and construction would be build-to-suit when future tenants are secured. The plan is speculative at this time, but this proposal is for 10-12 industrial/office buildings (approximately four million square feet, total) in the eastern section of the park and has been designed to capture the highest anticipated intensities and densities of development. The site plan also includes nine stormwater retention ponds and parking lots for each building. The site is located on the Shire Parkway extension, which serves as the access road for the park in parts of unincorporated Morgan, Newton, and Walton Counties. The proposed development would occupy property totaling 550 acres at a site bordered by phase one of Stanton Springs, Sewell Road, and I-20. Due to the speculative nature of the project, a definitive completion date is unavailable. The applicant estimates that the project would be completed around 2050. Currently, the site is heavily wooded with the exception of a cleared pad site and the aforementioned road extension. Should any changes to the proposed development significantly exceed the size, intensity, density, or expected traffic generation identified herein, another DRI Review may be required.

Compatibility with Existing Plans

The site sits within multiple jurisdictions. The proposed project (including large-scale office/industrial uses) aligns with the Character Area/Future Development Maps of all three county comprehensive plans. However, multiple plans stipulate that the project should not adversely impact the area's water resources.

The Newton County portion of the site is identified as the "Stanton Springs" Character Area on the Newton County Comprehensive Plan's Character Area-Future Development Map (dated 06/28/18). Newton's Plan envisions the Stanton Springs area as a regional employment activity center that embraces regional and nodal commercial development, professional offices, and high-tech or medical industrial development. The Plan stipulates that the Little River's water quality should be protected through the use of "Best Management Practices," and that a clear sense of entry should be provided at the US 278 exit off I-20. Industrial uses are listed as compatible.

The area of the site within Morgan County is identified as "Industrial" on the Morgan County Comprehensive Plan's Character Area Map (dated 07/18/17). Morgan's Plan proposes a development pattern that is characterized by employment centers with large, regional employers for this area, provided that residential uses are protected from excessive noise, smoke, light, and the visual impacts of industrial uses. Industrial, Commercial, and Business Park uses are the primary land uses. Traffic studies are required for developments over 200,000 square feet. The site is also located in an area deemed moderately suited for development according to the Morgan County Development Suitability Map (dated 07/18/17). This is likely due to the fact that the site is located within a Groundwater Recharge Area, as identified on the Morgan County Sensitive Environmental Resources Map (dated 07/18/17). The Plan states that development in water recharge areas requires stormwater mitigation and reduction of impervious surface area and that wetlands require replacement mitigation.

The Walton County Comprehensive Plan's Future Development Map (dated 06/06/17) identifies its portion of the site as "Employment Center." Walton's Plan encourages planned development concepts such as business/office parks that provide internal transportation networks that minimize traffic impacts on the overall road network. The overall area is intended for large-scale, employment-intensive commercial uses. Commercial, Office, and Industry are listed as appropriate land uses. Industrial development is permitted and encouraged in these areas.

The site is identified as "Developing" 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 build a compact development pattern on existing infrastructure. Due to the speculative nature of the project, it is impossible to determine whether the area's workforce will be suitable for future tenants. The JDA, through a combination of company recruiting and workforce training, should seek to ensure that available labor is a good match with the firms that may locate in this park. As currently proposed, the site and its surrounding street network is not suitable for multi-modal transportation, and the applicant indicated that thousands of new vehicular trips would be generated by this project. Prior to development approval, the counties should measure the life cycle costs of associated infrastructure to ensure that the proposal's tax revenue can cover these service costs.

Potential Interjurisdictional Impacts

The applicant states that the project would likely impact wetlands and floodplains. 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, historic resources, and other environmentally sensitive resources would be affected. The site plan shows a creek and associated wetlands form the western border of the site. There are also intermittent streams and riparian zones spread throughout the site. The site plan shows that the buildings and retention ponds would be constructed to generally avoid these water resources. However, many of the buildings and ponds are close enough to these resources that construction could create environmental disturbances. Due to the speculative nature of the project, the applicant did not submit any information regarding a mitigation plan, requested variances, or a Georgia Environmental Protection Division (EPD) review. Final construction approval should be withheld until more specific site and mitigation plans can demonstrate that these environmental resources will be protected and any effects properly offset.

An estimated 35% of the site would be covered in impervious surfaces, and nine retention ponds are planned to manage stormwater runoff. 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. The proposal should be designed to minimize disruption to the existing streams and associated wetlands and floodplains to avoid future erosion, flooding, and degraded water quality onsite and downstream from the site, including incorporation of low impact development measures. 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.

The National Wetland Inventory (NWI) identifies zero acres of wetlands onsite and 123 acres of wetlands within one mile of the site. The Northeast Georgia Regional Plan's Conservation and Development Map (dated 7/19/2018) identifies 396 acres of "Conservation" land onsite and 4,375 acres of "Conservation" land within one mile of the site. A portion of this acreage 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). Specifically, 57 of the 396 "Conservation" acres onsite and 1,586 acres of "Conservation" land within one mile of the site belong to the Green Infrastructure Network. No Regionally Important Resources are identified within one mile of the proposed site. The presence of so many acres of sensitive environmental resources indicates this site may be sub-optimal for intense development without significant mitigation measures such as those referenced in the previous paragraph. Site design should consider incorporating and enhancing natural areas onsite to benefit future employees and provide ecosystem services to the three counties the project spans.

No traffic impact study is available at this time due to the speculative nature of the project. The applicant estimates the project would generate a total of 2,400 trips per day, but does not provide peak hour estimates nor do these estimates identify potential truck/heavy vehicle traffic. These estimates are subject to change based on the tenant composition; however, the submitted proposal's design is intended to account for the highest anticipated intensity and density of development. The site would be served by a four-lane street—Shire Parkway—designed to handle significant vehicle traffic. At current traffic estimates, Shire Parkway is overbuilt as a divided four-lane road. This will increase the maintenance life cycle costs relative to the tax revenue generated from the project. A three-lane street can handle an estimated 15,000-25,000 AADT vehicle load, and the current traffic estimates do not reach that threshold. The extra capacity of Shire Parkway may not improve the traffic flow because the Parkway only connects to one road (US-278); any congestion impact

would likely be felt on US-278. Although not part of the current proposal, the possibility exists to connect Shire Parkway with Sewell Road and its bridge over I-20. This section of Sewall Road is unpaved and would require significant rebuilding to serve as another access point. However, upgrades would improve the flow of traffic and access to the site. If the JDA or Counties anticipate this proposal would attract residential and commercial development to nearby parcels, they should strongly consider adding multiple access points to the site—including bike, pedestrian, and transit-friendly infrastructure.

The project would be served by the Newton County Water and Sewerage Authority with an estimated daily demand of 1.0 MGD for water service and 0.80 MGD for sewer service. The applicant states that these demands can be covered by existing capacity and that no line extensions would be required. These estimates are subject to change, based on tenant composition. The potential effects of Stanton Springs on water resources are discussed in these communities' comprehensive plans; sustainability of the project's water demand should be closely monitored during build-out to avoid overextension of the region's water supply.

The applicant estimates the project would generate one million tons of solid waste annually and that sufficient landfill capacity exists to handle this waste. No hazardous waste would be generated. Should any changes to the proposed development significantly exceed the size, intensity, density, water usage or expected traffic generation identified herein, another DRI Review may be required.

The JDA estimates that the project would be worth \$15 billion at build-out in 2050 and generate \$2.4 billion in local taxes annually. On a per-acre basis, the project would be worth approximately \$27.3 million and generate approximately \$4.4 million in tax revenue. Due to the speculative nature of the project, these values are subject to significant variability based on actual tenant composition. These values may also be significantly diminished by tax breaks, as was done in Phase One of this park. These numbers also reflect a full build-out scenario 30 years in the future. Prior to approval, the Counties 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.

Comments from Affected Parties

Greg Boike, Director of Public Administration, Middle Georgia Regional Commission

MGRC does not anticipate any impacts from this project. However, given the speculative nature of the development at this time, additional development plans should be cognizant of the potential for future environmental impacts.

Scott Gaither, Planning Commission member, City of Social Circle

As a member of the City of Social Circle Planning Commission I am writing to you about the subject DRI. I've reviewed the data submitted and do not believe that there is sufficient information provided to determine if the proposed development of 10-12 industrial/office buildings is in the best interest of the region. These buildings are purely speculative as are any potential tenants therefore we cannot begin to understand how it will impact us as a small city nor how the proposal will impact the surrounding area and natural environment.

Obviously any job producing growth within Stanton Springs brings great opportunities and challenges to Social Circle but I cannot begin to measure those until we fully understand the magnitude of what is being proposed. Until such time as a use is identified I think this DRI is premature.

From a lay persons perspective I have concerns over the potential traffic that, "approximately four million square feet" of industrial can bring. Distribution and warehousing of this scale equals unprecedented commercial vehicle traffic, well over the guessed 24,000 trips per day. Knowing the existing infrastructure in the area, it cannot support those numbers and I know Morgan, Newton, and Walton Counties has not planned, nor prepared for the amount of infrastructure improvements necessary to support the proposal.

From an environmental perspective - again, not knowing the intended users we cannot being to understand the impacts.

Looking through the lens of a land use planner, the surrounding areas are low density, agricultural in nature. If they already have not done so, Morgan, Newton and Walton Counties will need to update their respective land use maps and prepare zoning districts to accommodate supportive commercial uses in the immediate vicinity.

NEGRC should be the non-biased party leading the discussions between Morgan, Newton and Walton Counties to identify appropriate supportive uses (zoning) and working to adopt compatible development and architectural standards across all three jurisdictions. This would ensure not only compatibility among independent developments but also ensures a harmonious built environment. Think of this one mile radius around Stanton Springs as a three county character area with the same design/architectural standards and compatible zoning.

Thank you for considering my comments.

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

The proposed Stanton Springs business and industrial park expansion on a 550-acre tract is 9 miles from the Covington Municipal Airport (CVC). It is located outside any FAA approach or departure surfaces, and airport compatible land use areas, and does not appear to impact the 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.

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



February 9, 2021

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

Re: Development of Regional Impact- Stanton Springs Master Plan (DRI# 3240)

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 550-acre expansion of the Stanton Springs Industrial Park located in Walton, Newton, and Morgan counties along Interstate 20. Permit applications to begin basic development have initiated this DRI.

The following comments are offered:

INFRASTRUCTURE

Transportation

No traffic study was provided, since the project is not advanced enough to produce the site plan necessary to generate traffic estimates. A rough estimate of 2400 trips a day was provided at buildout, which may not take place until 2050. No breakdown of truck traffic was given. Since the project will almost certainly generate considerable truck traffic, Gwinnett County recommends that provision be made for a resting area for truck drivers.

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

Water Supply and Wastewater

The proposed project is located within the Walton and Morgan County service areas; 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 Gwinnett County Stormwater Management Manual.

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