

DEVELOPMENTS OF REGIONAL IMPACT

Final Report

Northeast Georgia Regional Commission • 305 Research Drive, Athens, Georgia • www.negrc.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 #3360
Name of Project: Wayne Poultry

Name of Host Jurisdiction: Jackson County

Background

DRI review was initiated following the developer's request for a rezoning from Jackson County. Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 6/28/21—7/13/21.

Proposed Development

Galilee Partners is proposing construction of two warehouses totaling 2,284,200 SF on a 225-acre site at 1681 Wayne Poultry Road in Jackson County. Additionally, 469 truck parking spaces, 987 car parking spaces, and three stormwater detention ponds would be constructed. The project would be completed in one phase with an estimated completion date in January 2023. Currently, the site is undeveloped and mostly wooded. See the attached site plan and location map for further details.

Compatibility with Existing Plans

The site is identified as Industrial on the Jackson County Comprehensive Plan's Future Land Use Map (dated 12/11/20). The Plan's industrial land use policies include recommending that industrial development be confined to relatively level topography, possess adequate water and sewer service, have access to arterial streets, avoid creating excessive noise, odor, light, or hazardous conditions, limit impervious surface coverage to less than 60% of the site, generate high levels of employment, and make use of industrial park and campus designs for the site.

The site is also identified, in the same plan, as Urban on the Character Area Map. Development in this Character Area is expected to have water and sewer service, favor employment uses, use the automobile as the primary transportation mode, manage stormwater, and provide connectivity through paved roads with curb,

gutter, and sidewalks. Industrial uses are encouraged in this area. Generally, the proposal fits the Character Area and Future Land Use plans, but the need to extend water and sewer infrastructure is a significant inconsistency between the proposal and the local comprehensive plan. In addition, no description of the activities within the proposed warehouses has been provided; therefore, it cannot be determined whether the proposal would create excessive noise, odor, light, and/or hazardous conditions in conflict with the Plan.

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 development that matches the region's workforce, prices in the lifecycle cost of infrastructure, creates a sense of place, builds a compact development pattern on existing infrastructure, creates diverse and affordable housing, and compliments existing and planned transportation options—especially non-automobile transportation modes. Warehouses, by their nature, have trouble meeting some of these recommendations, such as creating a sense of place. However, recommendations such as building on existing infrastructure, pricing in the lifecycle costs of infrastructure, matching the region's workforce, and alignment with transportation options are relevant in assessing whether a warehouse is consistent with the Regional Plan. The proposal fits well into the regional transportation network due to its proximity to state highways and interstates, but the necessity of extending water and sewer infrastructure is inconsistent with the Regional Plan.

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. Pond Fork stream forms the western edge of the property, and another stream bifurcates the site. The site plan proposes no development in the 100-year floodplain; it is unknown whether any of those areas would be disturbed during construction.

The National Wetland Inventory (NWI) identifies 20 acres of wetlands onsite; 280 acres of wetlands are located within one mile of the site. The onsite acres also qualify as "Conservation" land according to the Northeast Georgia Regional Plan's Conservation and Development Map (dated 7/19/2018). The Map also finds an additional 705 acres of "Conservation" land located within one mile of the site. The Northeast Georgia Resource Management Plan identifies less than one acre of Regionally Important Resource (RIR) land onsite and identifies 45 acres of RIR land within one mile of the site. No Regionally Important Resource sites are identified within one mile of the proposed site.

An estimated 47% of the site would be covered in impervious surfaces, and three retention ponds are planned to manage stormwater runoff. The site plan shows two streams onsite, but proposes no construction within the mandatory 75-foot stream buffer nor within 100-year flood plain. However, no labels or descriptions explicitly state that these areas are to remain protected and undisturbed. 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.

Lumin8 Transportation Technologies submitted a traffic study that estimates the project would generate 3,726 new daily trips including 364 AM peak hour trips and 407 PM peak hour trips. An estimated 20% of the trips would be truck traffic. The study recommends adding and extending right and left turn lanes on Wayne

Poultry Road as well as implementing truck-friendly 75-foot turn radii on the site's driveways. The proposal includes three driveways for site access. Wayne Poultry Road serves primarily as an access street for multiple industrial facilities. The street will likely need ongoing maintenance to support continuous truck traffic, and the County should ensure that the infrastructure is built to a standard that can support trucks, and that these facilities generate enough tax revenue to pay for street maintenance.

The project would be served by the Jackson County water and sewer systems with an estimated daily demand of 0.027 MGD for each system. The applicant states that these demands can be covered by existing capacity. Approximately one mile of both water and sewer line extensions would be required to serve the site. The applicant estimates the project would generate 4,169 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 \$120 million at build-out in 2023 and generate \$240,000 in annual local taxes. On a per-acre basis, the project would be worth approximately \$533,333 and generate approximately \$1,067 in tax revenue. Prior to approval, the County 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

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

The proposed two warehouses (2.3 million SF) on a 225-acre tract is 5.4 miles from Jackson County Airport (JCA) and outside any FAA approach or departure surfaces, and airport compatible land use areas, and does not appear to impact the airport.

If construction or construction equipment exceeds 200' above the ground level an FAA Form 7460-1 must be submitted to the Federal Aviation Administration. Those submissions for the buildings or 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.

I have copied the Tom Strong with the Jackson County Airport (JCA) on this email. Thank you for the opportunity to comment on the proposed development.