

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 #3354
Name of Project:	Concord Road Light Industrial
Name of Host Jurisdiction:	City of Jefferson

Background

DRI review was initiated following the developer’s request for a rezoning from the City of Jefferson. The property would be rezoned from C-2 (Highway Business District) to LI (Light Industrial). Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 07/20/21—08/04/21.

Proposed Development

Johnnie Hastings and Integrity Development Group is proposing construction of 11 industrial buildings comprising 1,163,920 square feet, a 64,000 square foot commercial building, and a potential fire station. Additionally, 11 detention ponds and a significant area (but unspecified amount) of parking are proposed in the site plan. The proposed development would occupy property totaling 157 acres along Concord Road near its intersection with Highway 129 in the City of Jefferson. The parcel numbers are 092 003 and 092 006. Currently, the site is forested and undeveloped. No completion date has been determined; if the request for rezoning is approved and construction has not begun within five years (by 2026), an additional DRI Review may be required prior to the issuance of permits.

Compatibility with Existing Plans

The site is identified as “Commercial” on the City of Jefferson Comprehensive Plan’s Future Land Use Map (dated 06/2019). The Plan states that, “This category accommodates non-industrial business uses including retail sales, services, and related commercial uses...” The plan anticipates highway-orientated commercial uses in this area. The land parcels adjacent to this site are listed as Industrial, Conservation, or Utilities. The proposed industrial uses are not consistent with the plan’s future land use for this property. However,

industrial uses do fit within the area's transportation and general industrial development pattern along the I-85 corridor.

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 like 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, and the applicant states that the project can be staffed with the existing workforce. It is unknown if the project would create a self-sustaining amount of tax revenue to pay for adjacent infrastructure. This should be determined prior to approval of the project.

Potential Interjurisdictional Impacts

The applicant states that the project would likely impact groundwater recharge areas, wetlands, and floodplains. The applicant indicated that the other environmental quality factors identified on the DRI Additional Form, including water supply watersheds, protected mountain and river corridors, historic resources, and other environmentally sensitive resources would not be impacted. Numerous creeks cross the site. Although the site plan does not call for construction directly on these creeks, most of them are directly adjacent to buildings and parking lots where construction activities could easily impact those waters. Additionally, an estimated 60% of the site would be covered in impervious surfaces; 11 retention ponds are planned to manage stormwater runoff.

The National Wetland Inventory (NWI) identifies eight acres of wetlands onsite and 552 acres of wetlands within one mile of the site. The Northeast Georgia Regional Plan's Conservation and Development Map (dated 7/19/2018) identifies eight acres of "Conservation" land onsite and 1,270 acres of "Conservation" land within one mile of the site. Approximately six acres of Regionally Important Resource land is onsite, and 475 acres of Regionally Important Resource land is 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 (dated 8/7/2018). No Regionally Important Resource sites are identified within one mile of the proposed site.

The site plan proposes what appear to 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, 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.

A&R Engineering Inc. submitted a traffic study which estimates that the proposal would generate 1,885 total daily trips including 165 AM peak hour trips and 167 PM peak hour trips. Each of the planned nine buildings would have dedicated truck trailer and car parking lots and would each be accessed by one-to-two dedicated

driveways along Concord Road (15 total driveways). Given the potential for this project to create a job node, the City should consider whether biking or transit access would be warranted.

The project would be served by Jackson County's water and sewer systems with an estimated daily demand of 0.02 MGD for water and 0.035 MGD for wastewater. The applicant states that these demands can be covered by existing capacity. No water or sewer line extensions are anticipated. The applicant estimates the project would generate 850 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 \$5 million at build-out and generate \$186,000 in annual local taxes. On a per-acre basis, the project would be worth approximately \$31,847 and generate approximately \$1,184 in tax revenue. Prior to approval, the City 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

Jaime Dove, Jackson County, Jackson County Public Development Manager (see attached)



DEPARTMENT OF PUBLIC DEVELOPMENT

Planning & Zoning

August 2, 2021

Mr. Stephen Jaques
Northeast Georgia Regional Commission
305 Research Drive
Athens, GA 30605

RE: DRI # 3354 – Concord Road Light Industrial

Mr. Jaques,

Jackson County's Department of Public Development has reviewed the package you distributed for review, and wishes to provide the following comments:

1. The County does have concerns about the ability to provide appropriate transportation infrastructure.
 - a. Although the project roadways are solely located within the City limits of the City of Jefferson it must be mentioned that the large truck traffic the proposed project will generate will require improving the existing roadways around the site. The increased number of trips, and weight of vehicles will likely degrade the pavement at an accelerated rate. All road improvements and future road maintenance is the responsibility of the City of Jefferson, including the intersection of Concord Road and Valentine Industrial Parkway.
 - b. The industrial nature of the area and the increase of more industrial truck traffic could likely have consequences related to traffic safety. There are 14 new entrances proposed along Concord Road and there is a large apartment complex on Concord Road. For traffic safety it is imperative that all new entrances meet the minimum site distance view requirements. Turning lanes as well as deceleration lanes should be installed as per the traffic study.
2. All state waters must be protected by a minimum of a 75 foot buffer. It is encouraged that the project be designed to minimize impacts on water courses and buffers, flood plains and wetland areas. Any necessary impacts on water courses or buffers, flood plain areas and wetland areas should be required to go through the variance process.

As always we appreciate the opportunity to comment and for the job you do in coordinating these reviews.

Sincerely,

A handwritten signature in blue ink that reads "Jamie Dove".

Jamie Dove
Jackson County Public Development Manager