



DEVELOPMENTS OF REGIONAL IMPACT

Final Report

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

The Northeast Georgia Regional Commission (NEGRG) has completed its review of the following Development of Regional Impact (DRI). This report contains the NEGRG'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 #3392
Name of Project:	Commerce Business Center
Name of Host Jurisdiction:	City of Commerce

Background

DRI review was initiated following the developer's request for a land entitlement from the City of Commerce. Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 7/26/21 – 8/10/21.

Proposed Development

Ridgeline Property Group is proposing construction of three industrial warehouses comprising 2,289,280 square feet on a site along Nunn Road in the City of Commerce. Specifically, the proposed development would occupy property totaling 228 acres between Nunn Road and Lords Mill Road, near I-85's Exit 147. The parcel numbers are 034 002K, 034 002D, 034 001C, 034 002E, 034 002F. Additionally, 1,200 car parking spaces, 473 trailer parking spaces, and three detention ponds would be constructed. The project will be completed in one phase with an estimated completion date in 2025. Currently, the site is mostly open fields with some wooded areas.

Compatibility with Existing Plans

The site is identified as "Industrial Workplace" on the City of Commerce Comprehensive Plan's Character Area Map (dated 3/15/2021). The Plan states that, "the industrial workplace character area consists of manufacturing, industrial, storage, and warehousing sites. These are typically truck-oriented storage and distribution centers and business parks located along major roads and thoroughfares. The industrial workplace areas provide employment that capitalize on accessibility to major roads and highways for movements of freight and goods." Warehousing is listed as an appropriate land use. Development strategies for the area include: capitalizing on new industry to attract related support businesses, improving

infrastructure and utilities, working with partners to fill developable space, and strengthening development standards. The project appears generally consistent with these plans.

The site is identified as “Rural” on the Northeast Georgia Regional Plan’s Regional Land Use Map (dated 6/7/2018). It is also classified as an Area Requiring Special Attention based on its location within the Rapid Development corridor along Interstate 85. According to the Regional Plan, “Rural areas are not anticipated to become urbanized or require urban services in the next 20 years.” 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, 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 wetlands, floodplains, and other environmentally sensitive resources. The other environmental quality factors identified on the DRI Additional Form, including water supply watersheds, groundwater recharge areas, protected mountain and river corridors, and historic resources would likely remain unaffected. An estimated 48% of the site would be covered in impervious surfaces, and three retention ponds are planned to manage stormwater runoff.

The National Wetland Inventory (NWI) identifies 1.5 acres of wetlands onsite and 103 acres of wetlands within one mile of the site. The Northeast Georgia Regional Plan’s Conservation and Development Map (dated 7/19/2018) identifies zero acres of “Conservation” land onsite and 1,293 acres of “Conservation” land within one mile of the site. This acreage includes 194 acres of Regionally Important Resource land within one mile of the site (zero acres onsite) and 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 75-foot buffer areas along the streams and 50-foot buffers along the property line as required by law; however, no legend, notation, or labels identify them as areas to be protected. The proposal should be designed to minimize disruption to the existing river, 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.

Kimley Horn is in the process of conducting a traffic study for the proposal. Preliminary estimates suggest that the project would generate 3,662 new daily trips, including 300 AM peak hour trips and 303 PM peak hour trips. Nunn Road would be widened and improved to meet municipal standards. Two driveways from Nunn Road are proposed to serve the site. Final recommendations will be updated pending the results of the traffic study. The NEGRC recommends adding a connection to the property from Lords Mill Road to increase access

to the site and add flexibility to the transportation network, especially given the possibility of future growth in the I-85 corridor.

The project would be served by the City of Commerce's water and sewer systems with an estimated daily demand of 0.21 MGD for water and 0.18 MGD for wastewater. The applicant states that these demands can be covered by existing capacity. Both water and sewer lines would need extensions to serve the site. Each extension would be approximately 0.6-1.0 miles. The Regional Plan recommends against extending new infrastructure in favor of building on existing infrastructure to improve the fiscal sustainability of local governments.

The applicant estimates that the project would be worth \$75,500,000 at build-out in 2025 and generate \$1,145,000 in annual local taxes. On a per-acre basis, the project would be worth approximately \$331,000 and generate approximately \$5,022 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

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

The proposed construction of three industrial warehouses comprising 2,289,280 square feet on a 228-acre site along Nunn Road in the City of Commerce is 4 miles north east of the Jackson County Airport (JCA). It is outside the FAA approach and departure surfaces, and is outside airport compatible land use areas, and does not appear to impact the airport.

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

Jamie Dove, Public Development Manager, Jackson County (see below)



DEPARTMENT OF PUBLIC DEVELOPMENT

Planning & Zoning

August 2, 2021

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

RE: DRI # 3392 – Commerce Business Center – Warehouse and Distribution

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. The traffic, specifically 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.
 - b. The industrial nature of the area and the increase of more industrial truck traffic could likely have consequences related to traffic safety.
 - c. It is stated in DRI #3392 that a traffic study is being conducted by Kimley-Horn to gain a better understanding of the project's potential impacts. The final traffic study should be provided to all identified interested parties for further comment.
 - d. Concerning the portion of Nunn Road located in unincorporated Jackson County it is important that the industrial roadway specifications outlined in the Jackson County UDC be met and made equal to or greater than the Jackson County UDC requirements. See the attached road section detail. For work within the unincorporated portion of Nunn Road a right-of-way encroachment permit will be required from the Jackson County Road Department.
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.

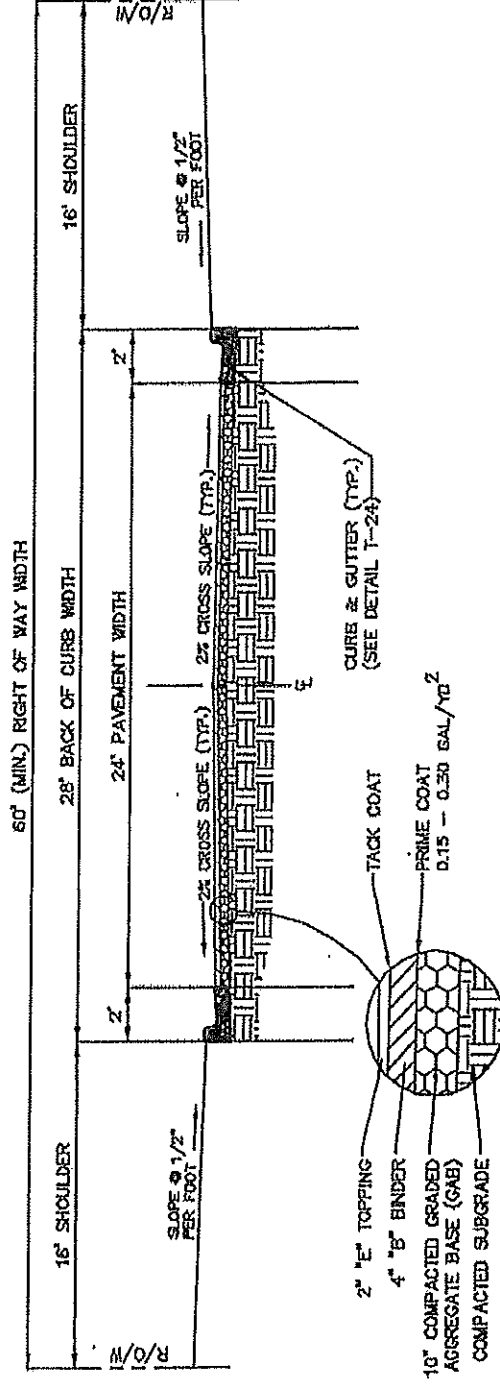
As always we appreciate the opportunity to comment and for the job you do in coordinating these reviews.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jamie Dove", is written over a faint horizontal line.

Jamie Dove
Jackson County Public Development Manager

1. COMPACTION REQUIREMENTS: PROVIDE 95% COMPACTION (STD. PROCTOR) OF FILLS UP TO WITHIN ONE FOOT OF FILL GRADE; PROVIDE 100% COMPACTION (STD. PROCTOR) IN UPPER ONE FOOT OF FILL IN AREA UNDER PAVING AND TWO FEET OUTSIDE PAVING AREA; PROVIDE 100% COMPACTION (STD. PROCTOR) FOR UPPER ONE FOOT OF EXISTING AND/OR RESIDUAL SOILS UNDER PAVING AND TWO FEET OUTSIDE OF PAVING PERIMETER. SCARIFY AND RE-COMPACT TO 100%.
2. CURB OR STREET MUST BE COMPLETE BEFORE UTILITIES CAN BE INSTALLED.
3. SEE DETAIL T-08 FOR UTILITY PLACEMENT INFORMATION.



STREET DETAILS
ROAD SECTION - (LOCAL COMMERCIAL/INDUSTRIAL STREET)

Scale: N.T.S.

Date: 12-20-04

DWG NO. T-05

REVISION: 06-09-15



UNIFIED DEVELOPMENT STANDARD DETAILS
of Jackson County, Georgia