

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 #3560
Name of Project:	Project Adventure
Name of Host Jurisdiction:	Morgan County (submitting entity), Walton County, City of Social Circle

Background

DRI review was initiated following the developer’s request for a rezoning from Morgan County. The site would be rezoned from Agricultural-Residential to Stanton Springs Business Park District (MXD-1) in all three jurisdictions. Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 01/07/22—01/22/22.

Proposed Development

The Joint Development Authority of Jasper, Morgan, Newton, and Walton Counties is proposing construction of a 20 million square foot automotive plant on approximately 2,000 acres in Morgan County, Walton County, and the City of Social Circle. The site’s borders approximately align with I-20 to the south, GA Hwy 12/US-278 to the west and north, and Old Mill Road to the east. Morgan County is the submitting entity for this DRI Review because it encompasses the largest portion (acreage) of the proposed project. Seven stormwater retention ponds, an internal street network, a walking trail, a test track, and parking lots for employees and truck trailers are also planned. The project would be completed in two phases with an estimated completion date for Phase One in 2024, and overall completion in 2026. Currently, the site consists of four streams, woodland, open farmland, two roads, a chicken farm, and multiple homes.

Compatibility with Existing Plans

The site is identified as “Rural Living” on the Morgan County Comprehensive Plan’s Character Area Map (dated 07/26/2017). The Plan describes this Character Area as predominantly agricultural with low-density, large-lot residential homes. Desired land uses include undeveloped land left in its natural state, agriculture, and low-density residential uses. Development priorities for the area include protecting water resources and

environmentally sensitive areas and the preservation of the agricultural economy. The Plan's Development Suitability map lists the area as moderately suited for development. The site is part of the County's groundwater recharge areas, as shown on the Plan's Sensitive Environmental Resource map (dated 07/26/2017). There are also unidentified historic resources and possibly a cemetery on site, as shown on the Plan's Cultural and Historic Resources map (dated 07/26/2017). Low impact, sustainable economic development is encouraged and desired by residents. Responsible public investment in infrastructure is also a clear priority in the Plan. The proposed plant would convert rural agricultural land into a high-impact, high-intensity development. A plant of this size would negatively impact the groundwater recharge area by converting millions of square feet into impervious surfaces. In addition, the DRI submittal noted that the plant is expected to generate "some hazardous waste, such as: paints, solvents, adhesives, batteries, [...] that are typical of such manufacturing facilities." These types of waste could be particularly harmful to the local groundwater recharge area as well. No mitigation proposal was provided; the applicant indicated that mitigation and disposal plans are currently being developed.

The project will generate new demand for infrastructure in a part of Morgan County where new infrastructure has not been planned. New infrastructure may attract further development that could be at odds with the rural and agricultural nature of the Character Area. Morgan County should compare the tax revenue of the project against the lifecycle maintenance costs of the associated infrastructure to ensure that the project would be fiscally responsible. The proposal does not mention how the historic resources and cemetery (if it is, indeed, found onsite) would be protected or effects mitigated. Pending explanation as to how the plant's potential effects on the character and natural and cultural resources in the area will be mitigated, the project appears generally inconsistent with the Morgan County Comprehensive Plan.

The site is identified as "Employment Center" on the Walton County Comprehensive Plan's Character Area Map (dated 04/17/2017). According to the Plan, "The overall character of the area is intended for large-scale, employment-intensive commercial uses." Industry is listed as a compatible land use. The Plan recommends that projects use "planned development concepts" like internal transportation networks and inter-parcel access to minimize traffic impacts on the adjacent road networks. Generally, the proposal appears consistent with Walton County's Plan. However, even inter-parcel access with multiple entry points may not be enough to offset the impact that thousands of new vehicle trips would have on the surrounding street and road network.

The site is identified as "Gateway Interchange" on the City of Social Circle Comprehensive Plan's Character Area Map (dated 03/28/2017). The Plan states that, "large scale industrial uses and employment centers" are appropriate due to ready access to I-20, railroads, and utilities. Large-scale industrial buildings and parking lots should be set back from roadways, present an attractive façade, plant appropriate landscaping, and screen unsightly parking lots and buildings from roadways including I-20 and Hwy 278. The site plan shows room for significant buffers on most of the property boundary although it does not label or expressly declare that these areas will be preserved as buffers. To ensure consistency with the Social Circle Comprehensive Plan, the design should incorporate sufficient landscaping and screening of the site. Generally, it appears that the proposal is consistent with the Social Circle Comprehensive Plan.

The site is identified as "Rural" 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. This project would create a significant impact on

the local and regional labor market, and the applicant states that the regional work force is sufficient to fill demand. However, in the current tight labor market, it is possible that this project could shift the workforce away from existing employers in the area. In the event that additional workforce training is necessary, technical colleges, WorkSource Georgia, and other workforce-focused organizations should collaborate to train an appropriate workforce.

The project, itself, does not include a housing component, but it would have a significant impact on local housing markets. To prevent workers from having to live far away and commute lengthy distances, adjacent communities should reassess their zoning regulations, building codes, and comprehensive plans to ensure a sufficient volume and diversity of housing is available for prospective workers and their families. New housing should be constructed in accordance with the Regional Plan's recommendations listed above.

Although the traffic study is not complete, the applicant estimates the project would generate 17,000 new daily trips. Even with the planned I-20 interchange expansion, the surrounding rural street network is limited, and may be overwhelmed during peak travel hours. The typical response to increased traffic has been to build wide, fast, high-capacity roadways. However, this approach can be exceedingly expensive and often ineffective at managing traffic in the long-term. A more effective approach would create a highly-connected local street network that distributes traffic across multiple avenues and provides safe and accessible infrastructure for people to walk, bike, or ride transit to their destination. This proposal is estimated to bring 7,500 jobs to the site. The site should be designed to accommodate bikes and transit so that employees can commute without a car and reduce their impact on the adjacent street network.

The site location makes it difficult for the project to meet the Regional Plan's recommendations since the Plan envisions this area as rural rather than the site of a new urban node. The Plan's recommendations for urban-area development and transportation would require significant changes to the existing land use pattern, transportation network, and the approach to environmental conservation. As currently proposed, the project is not consistent with the Regional Plan.

Potential Interjurisdictional Impacts

The applicant states that the project would likely impact environmental quality factors identified on the DRI Additional Form, including significant groundwater recharge areas, wetlands, and floodplains. The entire portion of the site within Morgan County is considered a "Groundwater Recharge Area" by the Morgan County Comprehensive Plan's Sensitive Environmental Resources Map (dated 7/26/2017). The addition of millions of square feet of impervious surface would impede the ability of this land to serve as a recharge area. This potential for reduced groundwater recharge, combined with the project's estimated 4.7 MGD water demand, could result in significant impacts to the region's water supply. Prior to approval, the applicant should clarify how the expected negative impact on groundwater recharging would be offset.

The National Wetland Inventory (NWI) identifies 29 acres of wetlands onsite and 232 acres of wetlands within one mile of the site. The Northeast Georgia Regional Plan's Conservation and Development Map (dated 7/19/2018) identifies 1,833 acres of "Conservation" land onsite and 9,195 acres of "Conservation" land within one mile of the site. This "Conservation" land includes 888 acres of Regionally Important Resource land onsite and 3,550 acres of RIR 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 (dated 8/7/2018). No specific Regionally Important Resource sites are identified within one mile of the proposed site. Since approximately 92% of the site is within a "Conservation" area, it would be advisable to approach site development with caution. The site plan makes no mention of the historic resources

and cemetery that appear to be located on the site, as labeled in the Morgan County Comprehensive Plan's Cultural and Historic Resources Map (dated 7/26/2017). According to the Georgia Natural, Archeological, and Historic Resources GIS Map, there are three historic buildings and one historic site on the proposed property. Five more historic buildings are directly adjacent to the site. The potential impact on these resources should be clarified and mitigation measures identified prior to development.

The site plan proposes eliminating two ponds and associated stream segments, and proposes road crossings across two additional stream segments. An "Adventure Trail" would be constructed around one of the remaining ponds/wetland areas. However, no legend, notation, or labels on the submitted site plan delineate buffers or areas to be protected throughout construction. Without heightened protection measures, it is likely that the extensive grading required for 20 million square feet of industrial space would damage these water resources, even if no construction is proposed in those areas. It is also likely that the extensive areas of impervious surfaces would result in negative impacts to the adjacent wetlands and waterways. An estimated 50% of the site would be covered in impervious surfaces, and seven retention ponds are planned to manage stormwater runoff. The applicant states that these ponds will be interconnected and that they will, "meet the current requirements required by the local issuing authority, Georgia Soil and Water Conservation Commission and Georgia Environmental Protection Division." 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, green roofs, pervious pavement, and other green infrastructure should be incorporated into the project design. In addition, water quality monitoring of adjacent waterways should be performed during and following construction to ensure any short- or long-term effects are identified and mitigated. 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.

The project would be served by the Newton County Water and Sewer Authority with an estimated daily demand of 4.7 MGD for water and 1.5 MGD for sewer. The applicant states that there is sufficient water supply capacity and that a wastewater treatment plant expansion that is already underway will have enough capacity for the new project. Water and sewer line extensions from the Stanton Springs Industrial Park across I-20 would be required. These extensions would be less than a mile long.

The applicant estimates the project would generate 6,716 tons of solid waste annually at full buildout and that sufficient landfill capacity exists to handle this waste. Hazardous waste, including paints, solvents, adhesives, batteries, etc. that are typical of automotive manufacturing would be generated. The applicant states that, "Disposal plans are being developed at this time, but at a minimum, such plans will meet local, state, and federal requirements." Given that the entire site is within a groundwater recharge area with sensitive environmental resources, meeting minimum requirements may not be sufficient to protect residents and local environmental resources. The suitability of these disposal plans should be confirmed prior to approval of the project and long-term monitoring of local water, soil, and/or air quality, as applicable, is recommended.

The applicant states that a traffic study is "in progress" and estimates that, at full buildout (7,500 employees), the project would generate approximately 5,000 peak hour trips and 17,000 new daily trips. An internal street network would be constructed to serve the site with three entrances. Additional infrastructure, including a new frontage road between Exit 101/US-278 and Old Mill Road and a new interchange for I-20 at Old Mill Road, is planned. Part of Old Mill Road would be widened at the interchange. The site is bisected by Sewell Road and Davis Academy Road. Both of these roads would be vacated within the site's boundary to make way for the proposed facilities. There is also a CSX railroad line nearby; however, the submittal is unclear about

whether/how it would tie into the site. If possible, a rail spur should be incorporated to serve the site. In addition, as stated earlier, the local street network would likely need significant expansion to handle the increased traffic. The site should be designed with multi-modal access in mind, especially since Morgan County and Social Circle already operate transit services that could provide critical access to the site.

The applicant estimates that the project would be worth \$5 billion at build-out, in 2026, and generate \$100 million in annual local taxes. On a per-acre basis, the project would be worth approximately \$2.5 million and generate approximately \$50,000 in tax revenue. Prior to approval, local jurisdictions should measure the life cycle costs of the infrastructure needed to serve this project and any spillover development 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

Congratulations to the Northeast Georgia region on landing this project. The direct employment impacts from this development can be expected to reach into the Middle Georgia region. Likewise, the potential for new development of supporting industries is high. As such, we expect that this project will provide significant positive economic impacts throughout Middle Georgia and the entire state.

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

This development is 10 miles from the Covington Municipal Airport (CVC), and is located outside of any FAA approach or departure surfaces, and airport compatible land use areas, and does not appear to impact the airport unless construction or construction equipment exceeds 200' AGL.

If any construction or construction equipment reaches 200' AGL or more, 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.

Brock Tyson, Assistant District Traffic Engineer, Georgia Department of Transportation

The DRI mentions that a traffic study is in progress. Once this is received, we will be able to review the impacts to determine the necessary improvements required.



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 lpropes@monroega.gov

January 21, 2022

Mr. Stephen Jaques
305 Research Drive
Athens, GA 30605

RE: DRI #3560, Comment from the City of Monroe

Dear Mr. Jaques,

Please accept this letter as formal comment from the City of Monroe regarding the Development of Regional Impact #3560 that will be partially in Walton County.

The City of Monroe's primary concern is heavy truck traffic that would be added during construction and after completion of the Rivian Truck Plant project. As of this date, there is a State of Georgia programmed truck connector route (PI 0000411 – S.R. 83 truck connector) that would route all heavy truck traffic that currently travels through the middle of Monroe's historic and award-winning Downtown along S.R. 11 onto a new bypass in Walton County to S.R. 83, then to U.S. Hwy 78. This project has been decades in the making and is currently in right-of-way acquisition phases. Construction is supposed to let later this year. **It is imperative that this project is completed by the Georgia Department of Transportation before the Rivian Truck Plant project reaches completion.** The addition of future complementary industries in this area will certainly add more traffic that would detrimentally affect Monroe without the truck connector project fully completed.

The City of Monroe already deals with the unfavorable effects of large volumes of truck traffic that use S.R. 11 as a north-south route between Interstate 85 in Braselton and Interstate 20 in Social Circle with S.R. 316 and U.S. 78 in between adding additional heavy truck traffic. Both Winder to our north and Social Circle to our south already enjoy bypasses of their downtown areas. Monroe will not be able to sustain additional heavy truck traffic without the completion of PI 0000411, and some additional work at the project terminus of U.S. Hwy 78 and S.R. 11 northbound at the interchange, to facilitate the thousands of trucks per day in a safe and efficient manner.

Best Regards,

Logan Propes
City Administrator



The City Of
SOCIAL CIRCLE

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January 21, 2022

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

RE: DRI #3560

Mr. Jacques,

On behalf of the City of Social Circle I appreciate the opportunity to provide the City's response to the referenced DRI. The proposed project to construct an automotive manufacturing facility on approximately 2,000 acres with 20 million square feet of building is quite significant not only to Social Circle, our region but also the entire State of Georgia. While only a small portion of the proposed project falls within the city limits, Social Circle could increase residential opportunities and could double our population before the next U.S. Census count. We could see new industrial and manufacturing opportunities for supportive supply chain industries.

The areas of impact are as follows.

- Land Use and Zoning:

Social Circle's Future Land Use Map and Zoning Map has identified areas of the city that are appropriate for industrial growth and development. The scale of industrial growth anticipated has always matched the scale of the city in relation to percentage of each land use category and population. The site is identified as a "Gateway Interchange" on the City of Social Circle Comprehensive Plan. The Plan states that, "large scale industrial uses and employment centers due to the ready access to I20 and railroad and utilities, and proximity to the Stanton Springs Industrial Park. Large scale industries should be well set back from the roadways, and present attractive façade and attractive landscaping. Prominent signage is appropriate on the industry for identification.

- Natural Resources:

Social Circle is proud to be the home of the Georgia Department of Natural Resources and not only does that include professional office space, but also wildlife habitat that is enjoyed by many outdoor enthusiasts. The proposed project area is a significant ground water recharge area for Morgan County and the information provided states that there are 29 acres of wetlands on site and 232 acres of wetlands one mile off the site. Employing runoff reduction and extended wet detention may require greater land area to achieve thus leaving less area for impervious surfaces. During site construction erosion and sediment control are of great concern to onsite wetlands and downstream waterways.

"Georgia's Greatest Little Town"



The City Of

SOCIAL CIRCLE

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- Infrastructure:

- Transportation

- The applicant states that a traffic study is “in progress” and estimates that, at full buildout (7,500 employees), the project would generate approximately 5,000 peak hour trips and 17,000 new daily trips. An internal street network would be constructed to serve the site with three entrances. Additional infrastructure including a new frontage road between Exit 101/US-278 and Old Mill Road and a new interchange for I-20 at Old Mill Road is planned. Part of Old Mill Road would be widened at the interchange. The site is bisected by Sewell Road and Davis Academy Road. Both roads would be vacated within the site’s boundary to make way for the project. There is also a CSX railroad line nearby.

- Water Supply and Wastewater

- The water supply and wastewater service are proposed to be served by Newton County Water and Sewer Authority. This solution would remove added pressures on the City of Social Circle’s water and wastewater treatment facilities and infrastructure. The City of Social Circle has gas in the area and would be able to provide the gas service.

- Services:

- The applicant estimates the project would generate 6,716 tons of solid waste annually at full buildout and states, “*That sufficient landfill capacity exists*”, and the developer is working on a plan. Hazardous wastes are byproducts of the automotive manufacturing process, and the applicant acknowledges this, but fails to address how disposal of hazardous waste will be handled but is working on a plan.

The Social Circle School System (SCSS) will be impacted by residential growth, and it is expected that student enrollment numbers will increase. Additionally, it is anticipated that specialized classroom instructions will be created to help fulfill the skills necessary for employment in automotive manufacturing. It is possible that a partnership between the SCSS and the proposed state funded training center can be formed with the goal of providing local career opportunities.

Social Circle appreciates the opportunity to respond to this DRI and its concerns over the proposed project’s impact to the region and Georgia’s Greatest Little Town.

Respectfully,



Barbara Schlageter

Assistant City Clerk/Planning & Zoning Administrator