

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.

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<b>Project I.D.:</b>	DRI #3619
<b>Name of Project:</b>	Wayne Poultry Road Site
<b>Name of Host Jurisdiction:</b>	Jackson County

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### Background

DRI review was initiated following the developer’s request for a rezoning from Jackson County. The property would be rezoned from Agricultural Rural Farm District (A-2) to Light Industrial (LI). Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 3/22/22—4/06/22.

### Proposed Development

HREG Acquisitions, LLC is proposing construction of 1,249,000 square feet of industrial warehouse space on a 143-acre site near the intersection of Wayne Poultry Road and Holly Springs Road in unincorporated Jackson County (parcel numbers: 078 007, 078 008, 078 008C, 078 018). The project would include three warehouses. Additionally, a large but unspecified amount of employee and truck parking spaces would be constructed. Four detention ponds are also proposed. Currently, the site is mostly former open farmland. The project would be completed in one phase with an estimated completion date in 2024.

### Compatibility with Existing Plans

The site is identified as Commercial on the Jackson County Comprehensive Plan’s Future Land Use Map (dated 12/11/20). The Plan’s commercial land use policies include discouraging “strip” commercial development, developing higher intensities in Urban Character Areas, consideration of long-term impact on the community, discouraging highway commercial uses on non-state highways, and limiting impervious surfaces to 60% of 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.

The proposal is not a commercial use. Therefore, it does not appear consistent with the Comprehensive Plan's Future Land Use Map. However, the surrounding area is designated for industrial development and many warehouses have already been built nearby. Given that the surrounding land use pattern is a mix of scattered residential lots, vacant farmland, and warehouses, the viability of commercial development may be called into question. The proposal is unlikely to create the problems that the Commercial land use designation is trying to avoid, so it may be said that the project indirectly meets the spirit of the land use plan. The Character Area for this parcel does encourage industrial uses in the area and the site plan seems to show that the project would fit the expectations for the Urban Character Area. Based on the prevailing development pattern, it seems that the proposal is mostly consistent with the Comprehensive 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. The applicant states that the project can be staffed by the region's workforce, but it is unclear if the lifecycle costs to the public infrastructure and services have been calculated. The project would require a short sewer line extension, which goes against the Regional Plan's recommendation to build on existing infrastructure. The Regional Plan recommends multi-modal transportation access, but the site is located in a place that is inaccessible without a vehicle. However, the warehouse proposal is consistent with the nearby truck transportation artery of I-85. The project appears inconsistent with the Regional Plan's recommendations. If the project can demonstrate that it prices in the lifecycle costs of infrastructure and provides a transit friendly drop-off point on-site, the proposal would more closely align with the Regional Plan.

### **Potential Interjurisdictional Impacts**

The applicant states that the project would likely impact wetlands and other environmentally sensitive resources. However, it is unlikely to affect the other environmental quality factors identified on the DRI Additional Form, including water supply watersheds, groundwater recharge areas, protected mountain and river corridors, floodplains, and historic resources.

The National Wetland Inventory (NWI) identifies two acres of wetlands onsite and 125 wetland acres are located within one mile of the site. The Northeast Georgia Regional Plan's Conservation and Development Map (dated 7/19/2018) identifies two acres of "Conservation" land onsite and 123 acres of "Conservation" land within one mile of the site. This "Conservation" land includes two acres of Regionally Important Resource land onsite and 38 acres of RIR land within one mile of the site. No specific Regionally Important Resource sites are identified within one mile of the proposed site.

An estimated 45% of the site would be covered in impervious surfaces, and four retention ponds are planned to manage stormwater runoff. The site plan shows a branching stream runs through the lot, and the largest warehouse would need to be built on top of one of stream branches. A stream crossing would also need to be built. The other warehouses are sited to avoid the stream, but all of them come close to encroaching on the riparian area. The site plan appears to show wetlands or buffers along the stream, but doesn't label them as such. The applicant states that existing stream buffers would be preserved, and that stormwater ponds would be designed to meet the Georgia Stormwater Manual. Generally, the NEGRC recommends against developing

in wetland and stream areas. The proposal should be designed to minimize disruption to the existing water resources 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.

The project would be served by the Jackson County water and sewer systems with an estimated daily demand of 0.016 MGD for each system. The applicant states that these demands can be covered by existing capacity. No water line extension would be required, but a 0.25 mile sewer line would be needed. The NEGRC Regional Plan recommends building projects on existing infrastructure rather than extending new lines. The applicant estimates the project would generate 2,200 tons of solid waste annually and that sufficient landfill capacity exists to handle this waste. No hazardous waste would be generated.

NV5 Engineers and Consultants completed a traffic impact study that projects 2,012 new daily trips, including 174 AM peak hour trips and 176 PM peak hour trips from the proposal. One driveway is proposed for site access. The study recommends right- and left-turn lanes at this entrance. The study finds the overall level of service for the area would not be negatively impacted by the project. The surrounding area has significant industrial development and associated truck traffic. This new proposal would be consistent with traffic patterns that are already established. However, additional truck traffic would likely accelerate the maintenance needs of the adjacent street network. The County should ensure that the revenue from the project would cover infrastructure maintenance, and that the street network is sufficient to handle higher levels of use. The Regional Plan advises that projects should include non-automobile access, but bike and pedestrian access is non-existent in this location. The inclusion of a transit stop or two where local providers could connect workers with other destinations could help better align the project with the Regional Plan.

The applicant estimates that the project would be worth \$90 million at build-out in 2024 and generate \$420,000 in annual local taxes. On a per-acre basis, the project would be worth \$629,371 and generate \$2,937 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**

*Jason Dykes, Assistant District Engineer, Georgia Department of Transportation*

The intersection of US 129 @ Wayne Poultry needs to be studied. It's estimated that 20% of their traffic will be going left there towards I-85. The left turn lane may not be long enough to accommodate that many more trucks. Also, the intersection of SR 82 @ Wayne Poultry needs to be evaluated for potential improvements as well.