

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 #3692
Name of Project:	Warehouse on SR 11 and E. Hightower Trail
Name of Host Jurisdiction:	City of Social Circle

Background

DRI review was initiated following the developer’s request to the City of Social Circle for variances, a permit, and sewer and water extensions. The applicant did not provide details about the specific permit or variances requested by the developer. Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 6/6/2022–6/21/2022.

Proposed Development

Longleaf Commercial LLC is proposing construction of 1,302,480 square feet of industrial warehouse space and a 1,004,400 square foot distribution center on a 235-acre site at 1365 E. Hightower Trail, which is at the intersection of E. Hightower Trail with State Route (SR) 11 in Social Circle (parcels: SC230005, SC230006). Additionally, the site plan includes three detention ponds, 1187 automobile parking spaces, and 1078 trailer parking spaces. Currently, the site is a mix of forest land and cleared land that appears in aerial imagery to have been recently farmed, with seven streams and two small wetland areas indicated on the site plan. Portions of the site are located within floodplains. The project has an estimated completion date of July 2024 and will be completed in one phase.

Compatibility with Existing Plans

The site is identified as “Industrial” on Social Circle’s Character Areas Map (dated 2/16/2022). Industry is listed as an appropriate land use in the Industrial Character Area descriptions in Social Circle’s Comprehensive Plan; however, the Industrial Character Area description in the Comprehensive Plan states that “a landscaped buffer with greenway trail network separates industrial areas from road frontage preserving the aesthetic character of the city.” The proposed setback along East Hightower Trail does not appear to give sufficient space for a buffer

between the development and the road. The Social Circle Bicycle & Pedestrian Plan 2020 proposes greenways on E. Hightower Trail and Social Circle Parkway. The Comprehensive Plan's description of this character area also includes that industries are set well back from the roadway, that they present an attractive façade and main entrance approach that is reminiscent of an institutional campus, that shade trees are provided within parking areas to reduce heat island effects and mitigate stormwater runoff, and that loading docks are strategically and aesthetically located to the side and rear of buildings. Details about how far back from the roadway the industries would need to be set to qualify as "set well back" are not provided in the Comprehensive Plan, but if setbacks are specified in the City's ordinances or codes, then those setbacks should be adhered to. Because no design details were provided with the DRI application, it is not possible to evaluate whether the proposed façade is "attractive" by local standards or whether the proposed approach is reminiscent of an institutional campus; the City should evaluate these details in its own review. In the site plan, there appear to be islands on which trees might be planted within employee parking areas, but not in truck parking areas. From the site plan, there appears to be a loading dock facing E. Hightower Trail, along the full length of the north side of building 100, which is inconsistent with the Comprehensive Plan's description that loading docks should be located on the side and rear of buildings. Overall, while the type of light industrial use proposed is consistent with the Comprehensive Plan, some of the specific details of the proposed site layout may be inconsistent, as described above.

The site is identified as "Developing" 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. In its own review, the City should evaluate the site layout, design, and façade details to determine whether this proposal would contribute to the intended sense of place for industrial parts of the city. Additionally, the development will require a 0.14-mile extension of the sewer line to serve the project, which is inconsistent with the Regional Plan's recommendation to build on existing infrastructure. The development does not currently act to extend the availability of non-automobile modes of transportation. Sidewalks and bike paths, such as greenway buffers and trails called for in the Comprehensive Plan and Bicycle & Pedestrian Plan (as described in the previous paragraph), could be incorporated into the site's design to allow commuting to the site via biking or walking instead of driving.

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. However, seven streams originate onsite. While the proposal includes three stream crossings, the proposal indicates that parking lots, roads, and buildings will be constructed on the upstream ends of three of the streams. Portions of the site are designated as FEMA flood areas, but no construction is proposed in these areas. The applicant estimates that 53% of the site would be covered in impervious surfaces, and three detention ponds are planned to manage stormwater runoff.

The National Wetland Inventory (NWI) identifies zero wetlands onsite and 99 wetland areas within one mile of the site. The Northeast Georgia Regional Plan's Conservation and Development Map (dated 7/19/2018) identifies 46 acres of "Conservation" land onsite and 1,454 acres of "Conservation" land within one mile of the site. This "Conservation" land includes 46 acres of Regionally Important Resource land onsite and 1,130 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. 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 a 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. completed a traffic impact study that projects 3,683 new daily trips, including 300 AM peak hour trips and 303 PM peak hour trips from the proposal. Recommendations from the traffic include three full-access driveways, each with one entering lane, one exiting lane, a stop-sign controlled driveway approach, and a left turn lane and deceleration lane for entering traffic. The study also recommends a channelized right turn lane for westbound E. Hightower Trail at SR 11. The site plan includes 1,187 automobile parking spaces and 1,078 trailer parking spaces. As noted above, it is recommended to incorporate non-vehicular transportation options like sidewalks, bike lanes, and/or trails into the site plan, in accordance with recommendations in the Comprehensive Plan and Bicycle & Pedestrian Plan. For an alternative, the site could include a wider buffer from the roadway to accommodate planned trails along E. Hightower Trail and Social Circle Parkway.

The project would be served by the City of Social Circle water and sewer systems with an estimated daily demand of 0.0296 MGD for each system. The applicant states that these demands can be covered by existing capacity. As previously noted, the project will require a 0.14-mile extension of sewer line, and no water line extension is anticipated. The applicant estimates that the project would generate 1,125 tons of solid waste annually and that sufficient landfill capacity exists to handle this waste. According to the Northeast Georgia Regional Solid Waste Authority's *Regional Solid Waste Management Plan (2021–2031)*, almost all municipal solid waste (MSW) generated in Walton County is disposed of in a landfill in Barrow County. The applicant states that no hazardous waste would be generated.

The applicant estimates that the project would be worth \$197 million at build-out in 2024 and generate \$1.5 million in annual local taxes. On a per-acre basis, the project would be worth approximately \$837,600 and generate approximately \$6,383 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 pay for.

Comments from Affected Parties

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

The proposed 1,302,480 square feet of industrial warehouse space and a 1,004,400 square foot distribution center on a 235-acre site in Social Circle is 8.5 miles east of the Covington Municipal Airport (VPC), 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.

However, 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.