

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 #3802
<b>Name of Project:</b>	Wastewater Treatment Facility Expansion
<b>Name of Host Jurisdiction:</b>	City of Hoschton

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### **Background**

The scale of the project is a greater than 50 percent expansion of the existing wastewater treatment facility’s capacity, based on the information provided by the project engineer; therefore, a DRI review is required during the local government’s approval process for the project. Potentially affected parties were asked to submit comments on the proposal during the 15-day period of September 9<sup>th</sup>, 2022, to September 24<sup>th</sup>, 2022.

### **Proposed Development**

The City of Hoschton proposes to expand an existing wastewater treatment plant from a capacity of 0.50 MGD to 0.95 MGD by 2025 and to 2.0 MGD by 2035. A previous expansion of this wastewater treatment facility, from 0.10 MGD to 0.50 MGD, was reviewed in 2003 (DRI #508).

The proposed expansions would be located on the 15-acre site of the existing treatment facility on Nancy Industrial Drive in Hoschton (parcel 113 008A), and no existing uses would be displaced by the proposed expansions. The expansions would include new headworks, two Orbal treatment units, two digestors, and facilities for biosolids management and UV disinfection. Additionally, a metal building would be constructed, as well as a pumping station and force main to discharge at Indian Creek near Sell’s Mill Park. A new pipeline to carry treated water to the new discharge location would be constructed from the treatment plant south to Amy Industrial Lane, along the full length of Amy Industrial Lane, along Jackson Trail Road from Amy Industrial Lane to Sell’s Mill Park, and within Sell’s Mill Park from Jackson Trail Road to the discharge location.

### **Compatibility with Existing Plans**

The site is identified as “Transportation, Communications, Utilities” on the City of Hoschton’s Future Land Use Map (dated February 2021). The City’s Comprehensive Plan (dated February 2021) describes this land use category as, “electric power substations, utility company installations, utility easements, communication towers, and other similar uses.” The plan’s list of Community Facilities and Services Policies includes “operating, maintaining, expanding, and replacing components of the wastewater system to ensure uninterrupted collection, transport, processing, and treatment.” The proposed expansions of the wastewater treatment facility are consistent with the specified land use classification and supported by the quoted policy.

The site is identified as “Developed” on the Northeast Georgia Regional Plan’s Regional Land Use Map (dated 6/7/2018). In addition, the Regional Plan’s Areas Requiring Special Attention (ARSA) Map (dated 6/7/2018) identifies the site as being in an area of “Rapid Development.” 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 regional workforce is sufficient to fill the demand created by the proposed project. It is not possible from the information submitted to evaluate whether the proposal prices in the lifecycle costs of infrastructure. While the expansions would primarily be located on the site of and connected with the existing wastewater treatment infrastructure, new infrastructure is needed to convey treated wastewater to the new discharge location. It is important during construction of the new pipeline that land disturbance be minimized and that the discharge site be constructed in such a way as to prevent negative impacts to Indian Creek. While this project would not create housing on its own, expanding wastewater treatment capacity would enable the development of additional housing within the area served by the sewer system.

### **Potential Interjurisdictional Impacts**

The applicant states that the project would affect a water supply watershed because the expanded plant would discharge more water into the watershed. The applicant states that this would be done in accordance with permitted flow and parameters and approved by Georgia EPD, and that water quality will be sufficient for downstream potable water reuse. The applicant states that the project is unlikely to affect any of the other environmental quality factors identified on the DRI Additional Form, including groundwater recharge areas, wetlands, protected mountain and river corridors, floodplains, historic resources, and other environmentally sensitive resources. In addition, the applicant submitted a letter from the Historic Preservation Division (HPD) of the Georgia Department of Community Affairs, finding that the project will have no adverse effect to historic property within its area of potential effect, provided that plans for the waterfall construction at the discharge point are submitted to HPD for review when available.

The National Wetland Inventory (NWI) identifies zero wetland acres onsite and 128 wetland acres 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 150 acres of “Conservation” land within one mile of the site. This “Conservation” land includes zero acres of Regionally Important Resource land onsite and 12 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. 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.

The applicant projects an increase of four trips to the facility by City staff each day. No traffic study was performed for the proposed project.

The applicant states that after completion of the current phase of the project, an estimated 18-20% of the site would be covered in impervious surfaces, and that the existing stormwater management system on site shall be expanded and improved in accordance with the City's Stormwater Management Plan. No information about stormwater infrastructure was included on the site plan.

The project would be served by the City of Hoschton water system, with an estimated daily demand of 0.007 MGD for the current phase of the project (Phase I). Phase I of the project would expand the capacity of the City of Hoschton's wastewater system to 0.95 MGD by 2025, and Phase II would expand the capacity to 2.0 MGD by 2035. The applicant states that demand can be covered by existing capacity. No water or sewer line extensions are anticipated, but a new pipeline would be constructed to convey treated wastewater to the new discharge location. The applicant estimates the first phase of the project would generate an additional 30 Dry Tons of solid waste annually and that sufficient capacity exists to handle this waste. The applicant states that no hazardous waste would be generated.

The applicant estimates that the project would be worth \$14 million at build-out in 2025 and generate between \$12 million and \$20 million annual local tax revenues. On a per-acre basis, the project would be worth approximately \$933 thousand and generate approximately \$800 thousand to \$1.3 million 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**

*Hannah Slater, Jackson County Public Development, Jackson County*

Jackson County's interest in the DRI comments lies solely based on soil and erosion. If any change in velocity is expected to occur at the discharge site, please make sure BMPs are in place to prevent any soil and erosion issues that may impact Indian Creek, or further receiving waters downstream.