

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 #3944
Name of Project:	Archer Aviation
Name of Host Jurisdiction:	City of Covington

Background

DRI review was initiated following the developer’s request for an unspecified permit as well as a sewer and water permit. The developer also proposes subdividing four parcels, with the portions of each parcel that borders the Covington Municipal Airport’s runway being retained by the airport. The parcel portions that would be retained by the airport total approximately 12 acres in size. Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 3/27/23–4/11/23.

Proposed Development

Archer Aviation is proposing the construction of 953,651 square feet of industrial space on an 85-acre site in the City of Covington. The proposed site plan includes two large facilities: the first is a large production building and the second is a flight operations building. The large production building would be 324,618 square feet in the first phase of construction and would be expanded to 894,134 square feet in the second phase. This facility would include a large production floor, a small lobby area with restrooms, and a 22,315-square-foot office space with an open office, conference rooms, restrooms, and a café. The site plan also proposes building a 59,517-square-foot flight operations building north of the production facility. This building would also have a large production floor as well as an office and break area.

In addition to the proposed buildings, the developer proposes constructing 677 parking spaces in the first phase of the development. 635 of these spaces would be located to the south of the production facility, and 42 would be located adjacent to the flight operations buildings. In the project’s second phase, the developer would construct an additional 392 parking spaces south of the production facility for a total of 1,069 parking spaces. The developer proposes creating two entrances to the site along Williams Road and constructing a

taxiway that would connect the flight operations facility with the Covington Municipal Airport runway. The developer also proposes constructing paved paths that would directly connect each facility to the Covington Airport taxiway. The developer proposes building two stormwater ponds east of the buildings, a firewater tank and fire tank west of the production building, and a solid waste collection area to the east of the production facility.

Currently, the site is primarily wooded. There are two unoccupied single-family homes on site that would be demolished during the construction process. The Covington Reservoir is located east of the project site, and a connecting stream runs through the project site. Two ponds and six wetlands are located on site. One small wetland area would be covered by the westernmost driveway, and another wetland area would be partially covered by one of the parking lots. The remaining wetlands as well as the two ponds would not be directly impacted. Dried Indian Creek, which is considered an impaired stream by the Georgia Department of Natural Resources, runs near the western border of the site, crossing into the site in some portions and running within 100 feet of the site boundary in other portions. An existing gravity sewer is located off-site and runs along the creek.

The proposed development is located along Williams Road and is located southwest of the Covington Municipal Airport and west of the Covington Reservoir in the City of Covington. Parcels affected by this project are C061 014, C061 015, C061 016, C061 017, and C061 018. Parcels C061 014, C061 015, C061 016, and C061 018 would be subdivided, and the portions of these parcels totaling approximately 12 acres closest to the runway would be retained by the airport. Parcel C061 014 borders the City of Oxford, which is located west of the project site. The project would be completed in two phases, with approximately 40% of the project being completed in the first phase and the remaining 60% completed in the second phase. The first phase has an estimated completion date in March 2024, and the second phase completion date has not been determined.

Compatibility with Existing Plans

The site is identified as “Transportation/Communication/Utilities” on the City’s Future Land Use Map (dated 12/22/2022). The “Transportation/Communication/Utilities” land use is described in the City of Covington’s Comprehensive Plan as “areas used for transportation, communication, or utility-related activities, such as power generation plants, sewage and water treatment facilities, landfills, railroad facilities, radio towers, public transit stations, telephone switching stations, airports, or similar uses.” The industrial component of the proposed development does not fit the site’s land use designation, as industrial land use is not included in the Transportation/Communication/Utilities (TCU) land use description. The proposed industry is somewhat transportation related as it manufactures transportation products, and the site does require a connection to the Covington Airport to be able to operate. Regardless, the City and the developer should be mindful of how the proposed project would impact surrounding areas, which includes a mix of industrial uses, mixed-use development, forested areas, single-family residences, and City Pond Park.

On the Northeast Georgia Regional Plan’s Regional Land Use Map (dated 6/7/2018), the portion of the site adjacent to the Covington Reservoir is designated as “Rural”, and the remainder of the site is designated as “Developing.” 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 complements existing and planned transportation options—especially non-automobile transportation modes. The applicant states that the project can be staffed with the region’s existing workforce. No information was provided in the application that would enable a determination of whether the proposal prices in the lifecycle cost of infrastructure. Because of the nature of industrial facilities, the proposed development does little to create a sense of place, contribute to a compact

development pattern, or create diverse and affordable housing. However, given the scale of this facility and the potential economic development impact, the City of Covington and surrounding jurisdictions should continue planning for the housing needs of future workers such as they have in the nearby Covington Town Center. This will ensure that employees at the facility can work close to the facility if they choose to.

The applicant states that there is existing water and sewer capacity for the project. However, it is unclear whether this capacity is only for the first phase of the project or for both phases. Because this project would be serviced by the City of Oxford's water and sewer systems, the City of Covington should ensure that the City of Oxford's infrastructure can adequately service the project. The applicant did not submit a traffic study as part of their application, but the City is planning on upgrading road infrastructure along Williams Road and at the intersection of Williams Road and City Pond Road to handle the increased vehicle and freight traffic. The City should be mindful of traffic impacts outside the project area, as the proposed project has the potential to significantly impact traffic volume coming through the adjacent City of Oxford via Highway 81 and East Soule St. The City of Covington should work with surrounding jurisdictions, including the City of Oxford and Newton County, to prepare for future transportation needs. Additionally, since both the City of Oxford and the City of Covington have growing bicycling and pedestrian infrastructure networks, the developer and City of Covington should consider improving pedestrian and bicycle access to the site or airport in general.

Potential Interjurisdictional Impacts

The applicant states that delineated wetlands are present on the perimeter of the site. They also state that a FEMA Flood Zone A is present on the western side of the site, but that the development does not impact the Flood Zone. This flood zone is surrounding the banks of Dried Indian Creek. The applicant states that the project is unlikely to affect any of the other listed environmental quality factors identified on the DRI Additional Form including water supply watershed, groundwater recharge areas, protected mountains, projected river corridors, historic resources, and other environmentally sensitive resources. Dried Indian Creek, which is located along the western boundary of the site and flows through portions of the site, is considered an Impaired Stream by the Georgia Department of Natural Resources due to impacted fish communities. The likely source of this impact is nonpoint source pollution and urban runoff. The developer should be mindful of impacts to this stream due to its existing conditions. 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 National Wetland Inventory (NWI) identifies 1.33 wetland acres onsite, and 84.4 wetland acres are located within one mile of the site. Most of the wetland area around the site is the Covington Reservoir. The Northeast Georgia Regional Plan's Conservation and Development Map (dated 7/19/2018) identifies 3.84 acres of "Conservation" land onsite and 813 acres of "Conservation" land within one mile of the site. This "Conservation" land includes zero acres of Regionally Important Resource land onsite and 665 acres of RIR land within one mile of the site. Most of the Conservation and Regionally Important Resource areas surrounding the site is the Oxford College of Emory University, which is in the nearby City of Oxford.

The applicant estimates that the first phase of the proposed project would generate 1,800 annual daily trips from the proposed development. The number of average daily trips would increase to 5,000 with the completion of the project's second phase. The applicant states that the City of Covington is in the process of widening Williams Road and improving the intersection of Williams Road and City Pond Road to serve the

project. The project would be served by the City of Oxford's water and sewer systems with an estimated daily demand of 0.02 MGD for each system at the completion of the first phase. At complete buildout, the estimated water supply and sewage flow will increase to 0.06 MGD. The applicant states that these demands can be covered by existing capacity. The applicant states that no water or sewer line extensions are anticipated. Upon the completion of the first phase, an estimated 30% of the site would be covered in impervious surfaces, and this would increase to 50% at the completion of the second phase. Two stormwater ponds are planned to manage stormwater runoff. The applicant estimates the project would generate 1,350 tons of solid waste annually and that sufficient landfill 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 \$65,000,000 at build-out and generate \$1,196,770 in annual local taxes. On a per-acre basis, the project would be worth approximately \$764,706 and generate approximately \$14,080 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

This development is on the Covington Municipal Airport (CVC). The City of Covington is responsible for ensuring that the requirements set forth in FAA Advisory Circular 150/5370-2, Operational Safety on Airports During Construction, are met during all construction phases of this project.

"Notice of Proposed Construction" FAA Form 7460-1's and sketches must be reviewed by the Georgia Department of Transportation's Aviation Programs office (Department) before submittal through the FAA website (<https://oeaaa.faa.gov/oeaaa/external/portal.jsp>). Any construction within the Runway Safety Area requires a runway closure and should be reflected in the applicable 7460's and sketches and coordinated with the Department and Airport. FAA Form 7460-1 submittals must be submitted to FAA not earlier than 18 months, and not later than 120 days prior to construction to allow time for all offices to comment on cases.

The City of Covington must ensure compliance with any law, ordinance, or regulation of federal, state, or local government body or organization that would apply to the development described within this report.

The State of Georgia is a Federal Aviation Administration (FAA) State Block Grant Program Participant, and City of Covington must therefore coordinate plans and specifications with the Georgia Department of Transportation prior to commencement of any construction or development on-airport property.

Thank you for the opportunity to comment on the proposed development.

Bill Andrews, City Manager, City of Oxford

The City of Oxford has comments on Sewer Availability and Transportation Upgrades.

SEWER AVAILABILITY

The narrative of the DRI mentions only 20,000 gpd for water and sewer, which I believe just pertains to Phase 1. However, in the screenshots of the DCA form, which is towards the end of the DRI document, there is a mention of a total of 60,000 gpd for total water and sewer use for Buildout. So, Phase 1 would be 20,000 gpd and Phase 2 (or "buildout") would require an additional 40,000 gpd for a total of 60,000 gpd.

Currently, Oxford has 38,500 gpd for sewer available. Covington has offered to sell the City of Oxford additional capacity at a price of \$22/gallon, but this capacity's availability is not guaranteed. The recommendation from Oxford would be for an agreement between Oxford and Covington be memorialized which reserves this additional capacity for Archer in the event it is needed for Phase 2.

Water capacity is available.

TRANSPORTATION

The DRI states, "[The] City of Covington is in the process of widening Williams Road and improving the intersection of Williams Road and City Pond Road." With Phase 1 estimated to create 1,800 average daily trips and Phase 2 increasing that number to 5,000, the City of Oxford is concerned that there is no mention of improving the roadway to the west, which includes E. Soule Street and its intersection with State Route 81 (Emory Street).

With the western entrance to Archer being approximately 2,500 feet from SR 81, it is believed a significant volume of employees and visitors (if not truck traffic, which will be prohibited) will use this section of roadway to access the site. With the school location, a poorly aligned signalized intersection, and only 10-foot travel lanes on E. Soule Street, there is some concern as to the capacity of that road and intersection to handle the inevitable increase in traffic.

I have attached an early concept budget of what the cost (\$5.4 million) for the road work could be from the Archer site to the E. Soule Street/SR 81 intersection which has been reviewed by Newton County and Covington officials. This budget would be subject to considerable change if the triple box concrete culvert on Dried Indian Creek does not need to be replaced or if the scope of the road work is reduced.

WILLIAMS ROAD/E. SOULE STREET IMPROVEMENTS - ALT. 5

Project No. 25127.0001

Covington, Georgia

Date Prepared: 02/21/2022

Full Depth Replacement of Existing Roadbed from Project Jane to Highway 81, along East Soule Street. NB and SB left turn lane and NB decel lane addition on Hwy 81 at E. Soule Street. Replace existing two-lane bridge over Dried Indian Creek and raise roadway approximately 3-feet (estimated) to clear flood zone.

Traffic Control:	\$100,000.00	
Grading Complete:	\$484,848.14	
Prop. Roadway Length (Williams Road/E. Soule Street):	3200 ft	
Prop. Roadway Width Williams Road/E. Soule Street:	24.0 ft	
Total Proposed Roadway Area:	9387 sy	
Proposed New Pavement Area:	9387 sy	Replace existing pavement
Asphalt Depth (FDR):	0.0 in	
Asphalt Depth (New Pavement):	7.5 in	
Graded Aggregate Base Course:	14.0 in	Where New Pavement
Spread Rate:	110.0 lbs/sy/in	
Tack Coat Rate:	0.06 gal/sy	
No. Tack Coat Layers:	3	
Curb and Gutter Length:	7040 ft	Use to minimize util impacts
Deceleration Lane Length:	0 ft	Included in total pvmt area
Deceleration Lane Taper:	0 ft	
Mill Depth:	0.0 in	
Average Mill Width:	0 ft	
Number of Driveways:	19 Each	
Avg. Width of Driveway:	25 ft	
Avg. Length of Driveway:	50 ft	
Cement Spread Rate:	61.0 lbs/sy	
Ditch Width:	0 ft	
Shoulder Width:	8 ft	
Foreslope Length:	0 ft	
Backslope Length:	12 ft	
Average Cut per Foot:	1.50 ft	
Earthwork Cost:	\$7.50 /cy	
Raise Roadway at Dry Indian Creek Crossing:	3.0 ft	
Length Estimated to Raise Roadway at Dry Indian Creek:	1200.0 ft	
Borrow Material:	10000 cy	
Borrow Material Costs:	\$15.00 /cy	
Minimum Width of Clearing (E. Soule Street):	74 ft	Existing ROW Width: 40 ft
Proposed Bridge Area:	4758 sf	
Existing Bridge Area:	1500 sf	
Sidewalk Width:	5 ft	
Storm Drainage Construction:	\$110.00 /ft	
Pavement Arrows:	2 Each	
No. of Signs:	8 Each	
Signing & Marking Construction:	\$8.00 /ft	



Permanent Erosion Control Construction:	\$20.00 /ft
MS4 Facilities:	0 Each
Number of Stages to Construct:	1 Each
% Type C Silt Fence:	100%
Water Quality Sampling Points:	2
Months of Construction:	12
Cost of Clearing:	\$21000.00 /Ac
Retaining Wall Quantity:	100 cy

OPINION OF PROBABLE CONSTRUCTION COST

Since the Engineer has no control over the cost of labor, materials, equipment, over the Contractor's methods of determining prices, or over competitive bidding or market conditions, the Opinions of Probable Construction Costs provided for herein are made on the basis of his experience and qualifications. These opinions represent his best judgment as a design professional familiar with the construction industry. However, the Engineer cannot and does not guarantee that proposals, bids, or the construction cost will not vary from Opinions of Probable Construction Costs prepared by him.

BASIS FOR ESTIMATE	
X	(No design completed-Master Plan)
	(Preliminary design)
	(Final design)
	(Other)

				ENGINEERS ESTIMATE	
ITEM	ITEM DESCRIPTION	QUANTITY	UNIT	UNIT COST	AMOUNT
150-1000	TRAFFIC CONTROL	1	LS	100000.00	\$100,000.00
156-0100	GPS DATA COLLECTION AND SUBMITTAL-P.I.	1	LS	0.00	\$0.00
163-0232	TEMPORARY GRASSING	6.0	AC	750.00	\$4,484.85
163-0240	MULCH	35.9	TN	375.00	\$13,454.55
165-0010	MAINTENANCE OF TEMPORARY SILT FENCE, TP A	0	LF	0.50	\$0.00
165-0030	MAINTENANCE OF TEMPORARY SILT FENCE, TP C	3200	LF	1.00	\$3,200.00
167-1000	WATER QUALITY MONITORING AND SAMPLING	2	EA	400.00	\$800.00
167-1500	WATER QUALITY INSPECTIONS	12	MO	700.00	\$8,400.00
171-0010	TEMPORARY SILT FENCE, TYPE A	0	LF	3.00	\$0.00
171-0030	TEMPORARY SILT FENCE, TYPE C	3200	LF	4.00	\$12,800.00
207-0203	FOUND BKFILL MATL, TP II	0	CY	78.00	\$0.00

ITEM	ITEM DESCRIPTION	QUANTITY	UNIT	UNIT COST	AMOUNT
210-0100	GRADING COMPLETE	1	LS	484848.14	\$484,848.14
310-1101	GR AGGR BASE CRS, INCL MATL	7951	TN	36.00	\$286,218.24
315-1000	PORTLAND CEMENT	0	TN	150.00	\$0.00
315-1012	CEMENT STABILIZED RECLAIMED BASE COURSE, 12 IN, INCL MATERIAL	0	SY	28.00	\$0.00
318-3000	AGGR SURF CRS	1500	TN	50.00	\$75,000.00
402-1802	RECYCLED ASPH CONC PATCHING, INCL BITUM MATL & H LIME	0	TN	136.00	\$0.00
402-1812	RECYCLED ASPH CONC LEVELING, INCL BITUM MATL & H LIME	0	TN	108.00	\$0.00
402	RECYCLED ASPH CONC SUPERPAVE, INCL BITUM MATL & H LIME	4259	TN	100.00	\$425,920.00
413-0750	TACK COAT	3379	GL	2.00	\$6,758.40
432-5010	MILL ASPH CONC PVMT, VARIABLE DEPTH	0	SY	5.90	\$0.00
441-0016	DRIVEWAY CONCRETE, 6 IN TK	2639	SY	60.00	\$158,333.33
441-0104	CONC SIDEWALK, 4 IN	3556	SY	36.00	\$128,000.00
441-0754	CONCRETE MEDIAN, 7 1/2 IN	0	SY	80.00	\$0.00
441-6222	CONC CURB & GUTTER, 8 IN X 30 IN, TP 2	7040	LF	31.00	\$218,240.00
500-3900	CLASS B CONCRETE, INCL REINF STEEL	100	CY	1235.00	\$123,500.00
643-8200	BARRIER FENCE (ORANGE), 4 FT	1120	LF	1.95	\$2,184.00
999-2015	STORM DRAINAGE CONSTRUCTION	352000	LS	1.00	\$352,000.00
999-2015	SIGNING & MARKING CONSTRUCTION	25600	LS	1.00	\$25,600.00
999-2015	PERMANENT EROSION CONTROL	64000	LS	1.00	\$64,000.00
999-2015	MS4 FACILITY	0	EA	175000.00	\$0.00
999-2015	BRIDGE CONSTRUCTION, DRY INDIAN CREEK	4758	SF	160.00	\$761,280.00
999-2015	REM EXISTING BRIDGE, DRY INDIAN CREEK	1500	SF	60.00	\$90,000.00
999-2015	INTERSECTION IMPROVEMENTS, SR 81, LEFT TURN LANE	9420	SF	40.65	\$382,923.00
999-2015	SIGNAL MODIFICATIONS, SR 81	1	LS	590000.00	\$590,000.00

ITEM	ITEM DESCRIPTION	QUANTITY	UNIT	UNIT COST	AMOUNT
999-2015	HYBRID SINGLE/DBL LANE ROUNDABOUT AND APPROACHES	0	LS	3000000.00	\$0.00
			ENGINEER'S ESTIMATE:		\$4,317,944.51
				CONTINGENCY:	25%
		TOTAL CONSTRUCTION COSTS:			\$5,397,430.63
	UTILITY RELOCATION - 8-IN WATER	3200	LF	125.00	\$400,000.00
	UTILITY RELOCATION - SEWER	0	LF	250.00	\$0.00
	RIGHT-OF-WAY/EASEMENT ACQUISITION SOULE STREET (40-FT EX ROW)	119680	SF	5.00	\$598,400.00
	RIGHT-OF-WAY ACQUISITION HWY 81 (60- FEET EX ROW)	27300	SF	5.00	\$136,500.00
		TOTAL PROJECT COSTS:			\$6,395,830.63

Construction Cost Per L.F. of Roadway (Including Bridge Replacement): \$1686.70/lf
Const. Costs per SF of Roadway (Not Including Bridge Replacement or Left Turn Lanes): \$46.53/sf
Project Costs Per L.F. of Roadway: \$1998.70/lf

Assumptions/Notes:

1. Full Depth Replacement of Existing Roadbed from Project Jane to Highway 81, along East Soule Street. Intersection improvements anticipated at East Soule Street and SR 81. Replace existing two-lane bridge over Dried Indian Creek and raise roadway approximately 3-feet (estimated) to clear flood zone.
2. Current FEMA Flood Map shows Dried Indian Creek overtopping E. Soule Street (Zone A).
3. Utility relocation NOT anticipated along E. Soule Street (use curb and gutter to reduce impacts to overhead utility poles). Same with east side of Hwy 81. Anticipate utility relocation at intersection of Hwy 81 and E. Soule Street. No cost impact to City of Oxford.
4. Right-of-way acquisition anticipated. Improved land cost used: \$5/SF.
5. Use curb and gutter where necessary to minimize impacts to existing utilities (N side E. Soule Street and E side of Hwy 81).
6. Left turn lane improvements on Hwy 81: 400' SB left turn lane storage; 160' NB left turn lane storage; and 250' right turn lane NB Hwy 81. 12-ft. symmetrical widening.
7. Assume E. Soule Street closed during construction due to proposed bridge replacement and associated roadway profile adjustments.