

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 # 3953
<b>Name of Project:</b>	Harvest Recycling
<b>Name of Host Jurisdiction:</b>	Walton County

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### Background

The DRI review was initiated by the developer’s requests for rezoning, an amendment to the Character Area Map in the Comprehensive Plan, and conditional use approvals from the Walton County Board of Commissioners. Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 4/12/23–4/27/23.

### Proposed Development

Harvest Recycling, LLC., is proposing construction of a recycling, composting, materials recovery, and waste transfer facility. The proposed development would occupy property totaling 101.1 acres at 157 U.S. Hwy 78, Monroe, located in unincorporated Walton County. The parcel numbers are C1770036 and C1770036A00. The project would be completed in one phase with an estimated completion date in December 2023.

The area covered by the waste management facilities would total 27.4 acres, with the other 73.7 acres remaining undeveloped to serve as a buffer. Specifically, the waste management facilities constructed would include four buildings, a concrete recycling area, a composting area, and a green waste recycling area. Additionally, vehicular access to the property from U.S. Hwy 78 would be via an internal access easement from the existing entrance to the adjacent Walton C&D Landfill.

Currently, parcel C1770036 contains a pond and a vacant pole barn, and the developer has indicated that the pond will remain on the site and that the pole barn will either be used for storage or torn down, depending on its condition. Parcel C1770036A00 is vacant land that is partly forested and partly cleared. The waste management facilities would be constructed mostly within the already-cleared portions of the site, with the

forested area left mostly intact. The applicant states that detention and/or retention ponds will be included on the site as needed, as determined by the design engineer, and that pervious parking services will be utilized. A portion of parcel C177036A00 is within the 100-year floodplain, but no structures are proposed to be constructed within this portion of the site.

### Compatibility with Existing Plans

The site is identified as on the Character Areas Map (dated 5/31/2022) as “Conservation.” The applicant has requested to change the Character Area of this site to “Highway Corridor.” In the Comprehensive Plan, the “Conservation” Character Area is described as “undeveloped land to be limited from development pressures due to sensitive environmental conditions and natural resource protection,” with appropriate land uses listed as, agriculture, forestry, low-density residential, conservation, parks, and outdoor recreation. The “Highway Corridor” Character Area is described as, “accommodates commercial and industrial development; appropriate for major thoroughfares,” with appropriate land uses listed as commercial, office, industry, public, and agriculture. The consistency of the proposed project with both character areas is summarized below.

CHARACTER AREA	PROPOSED PROJECT’S COMPATIBILITY WITH DESCRIPTION
<b>Highway Corridor Character Area (site proposed to be changed to this)</b>	<p>As a waste management facility, this facility would fit within the industrial use category that is compatible with the Highway Corridor Character Area. This site is adjacent to existing parcels within the Highway Corridor Area, so changing the Character Area for these two parcels from Conservation to Highway Corridor would not result in a drastic change to the Character Areas Map. In addition, because the developer proposes keeping nearly three quarters of the acreage of this site as buffers around the waste management area, the proposed industrial uses would be well-screened from view from the adjacent Conservation Character Area.</p> <p><b>For this project to be considered compatible with the Comprehensive Plan, it would be necessary for the County to amend the plan’s Character Areas Map, as proposed, prior to approval of the developer’s rezoning and conditional use requests.</b></p>
<b>Conservation Character Area (site proposed to be changed from this)</b>	<p>The theme of this character area, as described in the Comprehensive Plan, is “to preserve and protect Walton County’s natural resources, protect native habitats, and protect the regionally important water resources which are imperative to the resiliency of Walton County and all of its municipalities.” As an industrial use, a waste management facility is not among the appropriate land uses listed for this Character Area. However, by keeping a large, forested buffer separating the waste management activities from the Apalachee River and floodplain, as proposed, the project would protect these important resources in the short-term, consistent with the overall intent of the Conservation Character Area.</p> <p><b>Before changing this site from the Conservation Character Area to the Highway Corridor Character Area or taking any other final actions related to this project, the County should consider whether any additional protections or conditions are needed to protect the conservation values of this land in the long-term.</b></p>

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 complements existing and planned transportation options—especially non-automobile transportation modes. The proposed project is consistent with the Regional Plan, as summarized in the table below.

REGIONAL PLAN RECOMMENDATIONS	PROPOSED PROJECT'S COMPATIBILITY WITH RECOMMENDATION
<b>Match the region's workforce</b>	The applicant states that the regional workforce is sufficient to fulfill the demand created by the project.
<b>Price in the lifecycle cost of infrastructure</b>	No information was provided with the application that would enable evaluation of this recommendation.
<b>Create a sense of place</b>	By using forested buffers to separate the waste management facilities from adjacent uses, the proposed project would help maintain the existing sense of place of this location.
<b>Create diverse and affordable housing</b>	Not applicable to this project.
<b>Build a compact development pattern on existing infrastructure</b>	This project would be adjacent to an existing landfill and would share transportation infrastructure with the landfill site.
<b>Complement existing and planned transportation options</b>	This site would be accessed through the landfill's existing vehicular entrances. The projected annual increase in heavy truck traffic is low.

## Potential Interjurisdictional Impacts

### Natural Resources

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. Refer to the attached site plan for the approximate floodplain location.

The National Wetland Inventory (NWI) identifies 25 wetland acres onsite and 512 wetland acres within one mile of the site. The Northeast Georgia Regional Plan's Conservation and Development Map (dated 7/19/2018) identifies 101 acres of "Conservation" land onsite and 2,639 acres of "Conservation" land within one mile of the site. This "Conservation" land includes 8 acres of Regionally Important Resource land onsite and 485 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).

Shoal Creek forms the forms the northwestern border of the project site, and the northern corner of the site is located at the junction of Shoal Creek with the Apalachee River, a Regionally Important Resource. According to Georgia EPD's 2022 Integrated 305(b)/303(d) List, the Apalachee River from Shoal Creek to Freeman Creek is not supporting its designated Fishing and Drinking Water uses due to elevated levels of fecal coliform bacteria. To avoid exacerbating this issue, it is important to protect the forested buffer around Shoal Creek and the Apalachee River and to ensure that any potential fecal coliform sources on-site, such as the septic tank or any biosolids used as inputs in the composting areas, be properly managed to prevent further contamination. The proposal indicates that the forested buffer surrounding Shoal Creek, the Apalachee River, and the floodplain would remain intact and that no land disturbance activities are planned in these areas.

### Transportation

No traffic study was completed for this project. The applicant projects 50 new peak-hour daily trips from the proposed project. The site would be accessed via internal access easement through the existing entrance to the Walton C&D Landfill. Refer to the site plan for the location of proposed infrastructure, including the access

easement. The applicant states that pervious parking will be included in the project, but the number and location of parking spaces is not specified in the materials provided.

#### Water Supply and Wastewater

The project would be served by the Walton County water system, with an estimated daily demand of 2,500 gallons per day (0.0025 MGD). The applicant states that this demand can be covered by existing capacity. The project would use on-site septic to handle wastewater. No water or sewer line extensions are anticipated.

#### Stormwater Management

An estimated 15–20% of the site would be covered in impervious surfaces, with 27.4 acres of the site being used for the facility and the remaining 73.7 acres being left as a forested buffer. The applicant states that detention and/or retention ponds will be included as needed, as determined by the design engineer, and that pervious parking will be included in the project. The locations of stormwater and parking facilities are not shown on the site plan.

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.

#### Lifecycle Costs

The applicant estimates that the project would be worth \$200,000,000 at build-out in 2023 and generate \$300,000 in annual local taxes. On a per-acre basis, the project would be worth approximately \$2 million and generate approximately \$3,000 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**

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

This proposal is 8 miles from the nearest open-to-the-public airport, and is located outside of any FAA approach or departure surfaces, and airport compatible land use areas, and does not appear to impact any airport. This proposal also exceeds the recommended 5 miles for Hazardous Wildlife Attractants on or near Airports (AC 150/5200-33C).

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.