

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 # 4013
<b>Name of Project:</b>	Ackerman 81
<b>Name of Host Jurisdiction:</b>	Barrow County

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### Background

DRI review was initiated following the developer’s request for rezoning and a special use. The developer is requesting for a small parcel along Highway 81 to be rezoned from Agriculture-Residential (AR) to Light Industrial (M-1). The site is in a protected watershed, so the developer is submitting a special use request to increase the allowable impervious coverage from 25 percent to 48 percent. Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 7/20/2023 to 8/5/2023.

### Proposed Development

Ackerman is proposing construction of 584,920 square feet of industrial warehousing space on a 67-acre site in Barrow County. The proposed development includes three separate warehouse buildings; the largest building is situated in the middle of the parcel and is 324,000 square feet; the second largest building fronts Highway 81 and is 154,000 square feet; the smallest building is at the western end of the lot and is 106,920 square feet. All buildings have an unspecified number of employee parking spaces in front of the buildings and a truck court behind the buildings. The plan for the proposed site includes five stormwater detention ponds, and the site would have one entrance to Highway 81.

Currently, the site is wooded and undeveloped. A stream flows from north to south across the site, and the developer has proposed a road to cross this stream and its associated floodplain. This stream flows into Marbury Creek, which flows along a portion of the site’s southern boundary. Marbury Creek enters Fort Yargo Lake within a half mile of the project site, and a portion of Marbury Creek’s floodplain overlaps the site. There is a residential neighborhood along the site’s northwest boundary. The developer has proposed a 100-foot front building setback line (BSL), a 15-foot side BSL, and a 15-foot rear BSL. The site plan also includes a

required 50-foot zoning buffer for surrounding areas zoned residential and a 25-foot zoning buffer for those zoned agriculture.

The proposed development would be located at the western side of Highway 81 in unincorporated Barrow County. The parcel numbers are XX070 005 and XX070 006. The project would be completed in one phase with an estimated completion date in December of 2026.

### Compatibility with Existing Plans

The site is identified as Rural Neighborhood on the County's Character Areas Map (dated 3/29/2022). The intent of the Rural Neighborhood character area as described in the Barrow County Comprehensive Plan is to create a transition between Rural Reserve areas and development in Suburban Neighborhood areas and to maintain the existing rural character of the county. Future land use in these areas is intended to be low density detached single-family residences or agriculture/forestry. The priority design principles of these areas are to maintain tree cover, have a high percentage of open space, and have limited impervious surfaces in watershed protection district.

The proposed development is not compatible with the Rural Neighborhood character area. The proposed light industrial land use does not match the intended residential, agriculture or forested future land use. Additionally, the proposed site plan does not align with the character area's design principles: little tree cover is maintained, and the proposed 48 percent impervious surface goes beyond the 25 percent impervious surface allowable in the Fort Yargo Watershed District.

The site is identified as "Developing" on the Northeast Georgia Regional Plan's Regional Land Use Map (dated 6/15/2023). The Regional Plan recommends development that enhances economic mobility and competitiveness, elevates public health and equity, supports and adds value to existing communities, creates housing that is diverse, adequate, equitable, and affordable, includes transportation choices and is well-connected with existing and planned transportation options, and protects natural and historic resources. The proposed project's compatibility with these recommendations is summarized below:

### Regional Plan Compatibility

REGIONAL PLAN RECOMMENDATIONS	PROPOSED PROJECT'S COMPATIBILITY WITH RECOMMENDATION
<b>Enhances economic mobility and competitiveness</b>	The applicant states that the regional work force is sufficient to fill the demand created for the proposed project.
<b>Elevates public health and equity</b>	The warehousing facility has the potential to negatively impact the health and quality of life of the adjacent residential area due to noise and air pollution. The developer should maximize the buffer between the warehouse buildings and the adjacent residential area.
<b>Supports and adds value to existing communities</b>	Due to their nature, the proposed warehouses do little to add to the character of the area beyond providing additional jobs within the county.
<b>Creates housing that is diverse, adequate, equitable, and affordable</b>	The proposed development does not include any housing. The County should be cognizant of whether there is adequate housing around the development to provide affordable housing for potential employees.
<b>Includes transportation choices and is well-connected with existing and planned transportation options</b>	The proposed development is along a highway corridor in a lower-density area of Barrow County. Therefore, there is limited need for additional pedestrian and bicycling infrastructure. The County should also evaluate whether surrounding transportation infrastructure would be suitable and sufficient for new truck traffic that would be produced by the proposed facilities.

REGIONAL PLAN RECOMMENDATIONS	PROPOSED PROJECT'S COMPATIBILITY WITH RECOMMENDATION
<p><b>Protects natural and historic resources</b></p>	<p>The developer's special use request to increase the amount of impervious surface on site from 25 percent to 48 percent would increase the amount of stormwater flowing from the site compared with a site that limited impervious surface to 25 percent. The project site is in the Fort Yargo Watershed, which is a protected watershed that is connected to the Fort Yargo Lake. This lake is within a half mile of the project site and is used by visitors to Fort Yargo State Park for swimming, fishing, and boating.</p> <p>The high amount of stormwater flowing from onsite into surrounding streams could negatively impact the water quality of Fort Yargo Lake. A significant portion of the project site, including one proposed road, is within the floodplain. With the current trend of increasing severe storm intensity and frequencies, there is an increasing chance of flooding surpassing the 100-year floodplain level. Furthermore, the stormwater runoff from the proposal's high amount of impervious surface would further increase the likelihood of flooding at the site and downstream. Severe flooding of the project site could risk polluting surrounding streams.</p> <p>The proposal's detention ponds and placement of buildings at higher elevations would mitigate the risks described above somewhat; however due the buildings' proximity to the floodplain and the sensitive nature of this watershed, the developer should take extra precautions to ensure that the detention ponds are adequately sized to handle the site's stormwater and that the warehouses do not store hazardous materials. Additionally, the developer should consider incorporating green infrastructure, which would help to filter and absorb stormwater onsite. This could include bioswales, permeable pavements, green roofs, or rain gardens. The developer should also consider designing the site to withstand flooding events more severe than a 100-year flood.</p>

### Potential Interjurisdictional Impacts

The applicant states that the development has the potential to affect water supply watersheds, wetlands, and floodplains.

- Water supply watersheds:** The proposed project is in the Fort Yargo Watershed, which is designated as a protected watershed by Barrow County. The total impervious surface area in protected watersheds is limited to 25 percent of total area. The developer is submitting a special use request to increase the proposed impervious coverage to a maximum of 48%.
- Wetlands and Floodplains:** Wetlands and floodplain areas are present on site, and the proposed facility will require impacts to existing state waters and wetlands. The developer will be required to coordinate with the US Army Corps of Engineers to obtain a Nationwide Permit prior to land disturbance in these areas.

The applicant states that the project is unlikely to affect all other environmental quality factors identified on the DRI Additional Form, including groundwater recharge areas, protected mountain and river corridors, and historic resources.

The chart below summarizes the number of acres within the site area as well as within a one-mile buffer around the site that contains 1) wetlands, 2) conservation land, 3) regionally important resources, and 4) threatened regionally important resources. Please refer to the footnotes for definitions for each of these terms.

### Wetland, Conservation, and Regionally Important Resources

	AREA TYPE	AREA (ACRES)	PERCENT OF AREA
<b>SITE AREA (67 Acres)</b>	Wetland Acres <sup>1</sup>	7	11%
	“Conservation Land” <sup>2</sup>	7	11%
	Regionally Important Resource Land <sup>3</sup>	67	100%
	Threatened Regionally Important Resource Land <sup>4</sup>	3	5%
<b>1 MILE BUFFER AROUND SITE (3,035 Acres)</b>	Wetland Acres	216	7%
	“Conservation Land”	1,225	40%
	Regionally Important Resource Land	2,987	98%
	Threatened Regionally Important Resource Land	390	13%

Fort Yargo State Park, a Regionally Important Resource designated in the Northeast Georgia Resource Management Plan for Regionally Important Resources (2/15/2018), is located within one mile of the proposed project site. Furthermore, the site is within the watershed of Fort Yargo Lake, which is within the park.

As mentioned in the *Regional Plan Compatibility* table above, the high impervious surface percentage will result in the site producing more stormwater runoff, which could negatively impact Marbury Creek and Fort Yargo Lake. 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.

No traffic study was submitted with this proposal, but the applicant projects that the project will generate 976 new daily trips, including 95 AM peak hour trips and 98 PM peak hour trips from the proposed development. The applicant anticipates that a right-turn deceleration lane at the proposed driveway on Loganville Highway will be provided. Water for the project would be supplied by the City of Winder, and wastewater treatment would be provided by Barrow County. Both systems would have an estimated daily demand of 0.15 MGD. The applicant states that these demands can be covered by existing capacity. While the project site is currently serviced by water, the project would require 0.8 miles of sewer line extension. The applicant estimates the project would generate 5 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), Barrow County disposes of 75 percent of its generated municipal solid waste (MSW) within the county. The applicant states that no hazardous waste would be generated.

<sup>1</sup> Wetland acres are derived from the National Wetland Inventory (NWI)

<sup>2</sup> “Conservation” land is derived from the Northeast Georgia Regional Plan’s Conservation and Development Map (6/15/2023).

<sup>3</sup> Regionally Important Resources were identified as a part of the Northeast Georgia Resource Management Plan for Regionally Important Resources (2/15/2018).

<sup>4</sup> This area represents the intersection between Conservation areas (identified on the Conservation and Development Map, 6/15/2023), adopted Regionally Important Resources (RIR), and “Developed” and “Developing” Regional Land Use areas (identified on the Regional Land Use Map, 6/15/2023).

The applicant estimates that the project would be worth \$47,000,000 at build-out in 2026 and generate \$410,000 in annual local taxes. On a per-acre basis, the project would be worth approximately \$701,493 and generate approximately \$6,120 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**

Jonathan Peevy, P.E., Assistant District Traffic Engineer, Georgia Department of Transportation

Looking at this one, I have a lot of concerns for the corridor. SR 81 has a lot of horizontal and vertical curves, so we need to make sure that the sight distance is adequate, especially since there are a lot of high speed vehicles. Additionally, they need to assess their impacts at the SR 316 ramps as well as the US 29 @ SR 81/SR11 intersection in Winder. These intersections will have impacts from the trucks and won't be fully equipped to handle the additional truck traffic.

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

This proposed development is about 4.4 miles from the Barrow County Airport (WDR), and is located outside the approach and departure surfaces, and outside of the 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.