

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 #4069
Name of Project:	A. Scott Emmons Water Reclamation Facility Phases 2 and 2A
Name of Host Jurisdiction:	Newton County

Background

The scale of the Phase 2 project is a greater than 50 percent expansion of a wastewater treatment facility’s capacity, and Phase 2A is a new wastewater treatment facility; 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 period of 11/8/23–11/29/23.

Proposed Development

The Newton County Water and Sewerage Authority (NCWSA) is proposing to expand the capacity of the existing A. Scott Emmons Water Reclamation Facility (ASEWRF) to treat sanitary wastewater flows from 1.5 MGD to 2.75 MGD (Phase 2), as well as to further expand the capacity to 3.75 MGD in a future phase. NCWSA is also proposing construction of a new 5.5 MGD Industrial Water Reclamation Facility to treat industrial wastewater for non-potable reuse water distribution (Phase 2A). The project would be completed in three phases, with estimated completion dates of December 2025 (Phase 2A) and December 2026 (Phase 2). No estimated completion date for the future expansion to 3.75 MGD was provided.

All phases of the proposed development would take place on an 84-acre site in the Stanton Springs Technology Park in Newton County. The proposed ASEWRF Phase 2 expansion and the future expansion to 3.75 MGD would both be built on the same parcel as the existing conventional ASEWRF wastewater treatment facility (0134000000004000). The site of the Industrial Water Reclamation Facility (Phase 2A) is a separate, nearby parcel that is currently undeveloped (0134000000005Q00). Phase 2A would be near Shire Parkway. The Phase 2 expansion and future conventional treatment facility expansion would be accessible from Shire Parkway via an existing long gravel driveway. No current uses would be displaced by the proposed facilities.

The expansion of the existing conventional water reclamation facility (Phase 2) includes the following new structures, shown in yellow on the site plan: grit collection, sequencing batch reactor, sludge digester, post equalization, and effluent pump station. Note that no site plan has been provided for the future phase of this project that would expand this facility from 2.75 to 3.75 MGD, but the applicant has indicated that the future expansion phase would be located on the same parcel as the current ASEWRF and the Phase 2 expansion. The AWEWRF is currently permitted to discharge up to 1.25 MGD into the Little River. All water currently treated at the facility (approximately 0.5 MGD) is pumped to the Yellow River Water Reclamation Facility, not discharged to the Little River; however, the applicant anticipates that treated water from the ASEWRF will be consistently discharged to the Little River soon within the allowable permitted discharge volume. With the proposed Phase 2 expansion to 2.75 MGD, the facility’s discharge limit is expected to increase by an additional 1.25 MGD. Some of the treated effluent from the conventional ASEWRF facility would also be pumped to the industrial wastewater facility as needed to supplement non-potable reuse water demand.

The proposed Industrial Water Reclamation Facility (Phase 2A) would include four tanks, an approximately 10,000 square-foot building containing industrial wastewater treatment equipment, a transformer pad, an HVAC pad, and a liquid lime system. The site plan additionally shows the location of vehicular entrances and other paved areas (both asphalt and gravel), decorative and security fencing, curb and gutter, gates, and setbacks. The proposed Industrial Water Reclamation Facility would treat industrial wastewater and recirculate it back to industries within Stanton Springs for non-potable reuse.

Compatibility with Existing Plans

Newton County Comprehensive Plan

The site is identified as “Industrial/Heavy Commercial” on the county’s Character Areas Map (dated June 2023). The proposal is consistent with this character area’s narrative in the Newton County Comprehensive Plan, as summarized in the table below.

Character Area Compatibility

CHARACTER AREA	SUMMARY OF CHARACTER AREA NARRATIVE	PROPOSED DEVELOPMENT’S COMPATIBILITY WITH CHARACTER AREA
INDUSTRIAL/HEAVY COMMERCIAL	<p>Summary description in Comprehensive Plan: “characterized by concentrated industrial development and heavy commercial properties”</p> <p>Recommended land uses: Industrial, Commercial, Public Institutional, Mixed-Use Commercial, Development Node, Agricultural/Forestry, Transportation/Communication/Utilities</p> <p>Narrative also includes County Facilities & Services Goal #1: Ensure the county’s utilities and infrastructure are sufficient to meet the needs of current and future residents.</p>	<p>Wastewater reclamation facilities fit with the recommended land uses for this character area because they are industrial in nature and are utilities.</p> <p>By returning treated wastewater to neighboring industries for non-potable use, the proposed new industrial wastewater facility would support the development and operations of other facilities that are consistent with the industrial nature of this character area.</p> <p>Increasing the capacity of the conventional wastewater treatment plant to 2.75 MGD now and 3.75 MGD later would help Newton County achieve County Facilities & Services Goal #1.</p>

Northeast Georgia Regional Plan

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.

Regional Plan Compatibility

REGIONAL PLAN RECOMMENDATIONS	PROPOSED PROJECT’S COMPATIBILITY WITH RECOMMENDATION
Enhance economic mobility and competitiveness	The industrial wastewater treatment facility would support nearby industries by treating their waste and making treated wastewater available to them for non-potable reuse. The applicant states that the regional workforce is sufficient to fill the demand created by the project.
Elevate public health and equity	Phase 2 and the future expansion phase would be built on the site of an existing water reclamation facility, and Phase 2A would be built on a parcel that is surrounded by other industrial facilities. Public health and equity impacts from these facilities are likely to be minimal, provided that odors are controlled.
Support and add value to existing communities	The proposed conventional wastewater treatment expansions would support recent and expected future housing growth in the area by increasing the capacity of the existing treatment facility. As noted above, the industrial wastewater treatment facility would support nearby industries.
Create housing that is diverse, adequate, equitable, and affordable	No houses would be built as part of the proposed project. However, by increasing the county’s wastewater treatment capacity, the proposed project would help meet increasing wastewater treatment demand within the county, including from new housing development.
Include transportation choices and is well-connected with existing and planned transportation options	The applicant projects very little new traffic, including heavy truck traffic, as a result of the new development. No new road infrastructure would be needed except to provide access to the new industrial wastewater treatment facility with Shire Parkway.
Protect natural and historic resources	The ASEWRF has not yet begun discharging treated wastewater to the Little River. It is important that the discharge site be monitored, once discharge begins, to ensure that erosion-control measures are adequate to prevent discharge flows from causing erosion at and downstream of the discharge site.

Middle Ocmulgee Regional Water Plan

The 2023 regional water plan includes six goals. The proposed development would support three of them, primarily through the proposed industrial wastewater treatment facility, as summarized in the table below.

Regional Water Plan Compatibility

RELATED REGIONAL WATER PLAN GOALS	PROPOSED PROJECT’S COMPATIBILITY WITH RECOMMENDATION
Goal 1. Maximize water supply sources to the extent practicable to provide sufficient water supply for the region.	By returning treated wastewater to local industries for non-potable reuse, the proposed industrial wastewater treatment facility would introduce a new water supply source for these facilities, reducing their demand for treated potable water. The industrial wastewater treatment facility, as proposed, also seeks to promote an efficient use of water and utilize technologies for beneficial reuse.
Goal 3. Promote conservation of and efficient use of water.	
Goal 4. Promote properly managed wastewater discharges and beneficial reuse.	

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.

Natural 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
SITE AREA (83.7 Acres)	Wetland Acres ¹	82.4	98.4%
	“Conservation Land” ²	16.2	19.3%
	Regionally Important Resource Land ³	82.2	98.2%
	Threatened Regionally Important Resource Land ⁴	82.4	98.4%
1 MILE BUFFER AROUND SITE (4,586 Acres)	Wetland Acres	4,182.5	91.2%
	“Conservation Land”	2,65.1	5.8%
	Regionally Important Resource Land	4,060.5	88.5%
	Threatened Regionally Important Resource Land	3,336.9	72.8%

Part of the Regionally Important Resources land is within the Northeast Georgia Green Infrastructure Network. The Northeast Georgia Green Infrastructure Network is intended to serve as a strategically planned and managed network of wilderness, parks, greenways, conservation easements, and working lands with conservation value that benefits wildlife and people, supports native species, maintains natural ecological processes, sustains air and water resources, links urban settings to rural ones, and contributes to the health and quality of life for the communities and citizens sharing this network. No specific RIR sites are located within 1 mile of the site.

Water Supply and Wastewater

The project would be served by Newton County water and sewer systems with an estimated daily demand of less than 0.005 MGD for each system. The applicant states that these demands can be covered by existing capacity. Water and sewer line extensions of approximately 0.25 miles would be required for the proposed project. This project proposes to increase conventional and industrial wastewater treatment capacity and to reduce potable water demand from nearby industries.

¹ Wetland acres are derived from the National Wetland Inventory (NWI)

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

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

⁴ 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).

Stormwater Management

An estimated 50% of the site would be covered in impervious surfaces. No retention/detention ponds are shown on the site plan, but the applicant states that onsite stormwater management will include best management practices, including detention ponds, in accordance with the Georgia Stormwater Management Manual. 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.

Transportation

No traffic study was completed for this proposal. The applicant projects 10 new daily trips from the proposed development. An ingress/egress would be constructed from the industrial wastewater reclamation facility to Shire Parkway. Refer to the attached Phase 2A site plan for more details and the site plan for the location of proposed infrastructure.

Solid Waste

The applicant estimates the project would generate 2,500 tons of solid waste annually and that sufficient landfill capacity exists to handle this waste. According to annual tonnage reports from the Georgia Environmental Protection Division, almost all municipal solid waste (MSW) generated in Newton County is disposed of in a landfill within the county. The applicant states that no hazardous waste would be generated.

Lifecycle Costs and Revenues

The applicant estimates that phases 2 and 2A together would be worth approximately \$115 million at build-out. On a per-acre basis, the project would be worth approximately \$1.4 million. No taxes would be generated directly by this project, as NCWSA is exempt from paying local taxes; however, this project would indirectly enable additional tax-generating residential, commercial, and industrial development through increased wastewater treatment capacity. 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 and utility fees can cover.

Comments from Affected Parties

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

This proposed water reclamation facility is 8.5 miles from the Covington Municipal Airport (CVC), and outside any approach and departure surface, and is beyond the recommended 10,000 feet from the airport due to being a wildlife attractant, and does not appear to impact the airport.

If any construction equipment or construction exceeds 200' AGL, an FAA Form 7460-1 must be submitted to the Federal Aviation Administration according to the FAA's Notice Criteria Tool found here (<https://oeaaa.faa.gov/oeaaa/external/gisTools/gisAction.jsp?action=showNoNoticeRequiredToolForm>). Those submissions for any associated cranes may be done online at <https://oeaaa.faa.gov>. The FAA must be in receipt of the notifications, no later than 120 days prior to construction. The FAA will evaluate the potential impacts of the project on protected airspace associated with the airports and advise the proponent if any action is necessary.