DEVELOPMENTS OF REGIONAL IMPACT

Final Report

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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 #4297
Name of Project:	A. Scott Emmons Water Reclamation Facility Phases 2 and 2A
Name of Host Jurisdiction:	Newton County

Background

DRI review was initiated following the developer's request for a permit. Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 10/18/2024 - 11/2/2024.

Proposed Development

The Newton County Water and Sewer Authority (NCWSA) is proposing construction of an approximately 300-acre land application system (LAS) in Newton County adjacent to its existing A. Scott Emmons Water Reclamation Facility. The proposed LAS would process reject water from an Industrial Wastewater Reclamation Facility (IWRF) proposed in DRI 4069. Reject water would flow from the IWRF to the LAS via a 12" PVC industrial wastewater gravity sewer. Associated infrastructure includes a storage pond, a pump/controls building, and a pump station to pump reject water to the storage pond. A spray system distribution main would run along the access road to the A. Scott Emmons Water Reclamation Facility. Phase 1 of the LAS would process approximately 260,000 gallons per day on an initial 78.1 acres. The LAS would be expanded as needed to a maximum capacity of 1.1 MGD on 300 acres.

The proposed development would occupy property totaling approximately 300 acres on both sides of Baxalta Parkway in unincorporated Newton County, just north of the existing A. Scott Emmons Water Reclamation Facility. Currently, the site is primarily wooded. The Little River and associated wetlands run along the western border of the site, and Dennis Creek runs through the eastern portion of the site. The site plan denotes two different archaeological sites on the project site, with the archaeological site west of the access road being a cemetery and the one to the east being a 19th century home site. The site plan includes a 300-foot buffer around each resource.

The proposed LAS would be installed during phase 2A of the overall project, which would be completed by December 2025. The remainder of Phase 2 outlined in DRI 4069 would be completed by December 2026.

DRI Context

DRI 4297 is a scope of work addition to what was proposed in DRI 4069 (also titled A. Scott Emmons Water Reclamation Facility Phases 2 and 2A). Phase 2A of DRI 4069 included a 5.5 MGD IWTF to reclaim and distribute non-potable water to industrial users in northeast Newton County. Originally, reject water was designed to flow to the nearby A. Scott Emmons Water Reclamation Facility (ASEWRF), but to preserve the capacity of the ASEWRF, the NCWSA is proposing the above-described LAS. The LAS would be designed to treat all reject water from the IWTF, which would be approximately 20% of total influent volume. At the plant's full capacity, total reject water is expected to be 1.1 MGD. In the first phase of the IWTF, approximately 260,000 gallons of reject water per day would flow to the LAS (20% of the 1.3 MGD influent flow for the first phase of the IWTF). The LAS sprayfield would be expanded as growth and demand dictate.

Please note, DRI 4297 is only a review of the proposed LAS and does not analyze the IWRF or expansion to the ASEWRF that was proposed in DRI 4069.

Compatibility with Existing Plans

The site is identified as Industrial/Heavy Commercial on the County's Character Areas Map (dated 6/27/2023). The Industrial/Heavy Commercial character area is described in the Newton County Comprehensive Plan as concentrated industrial development and heavy commercial properties such as large machinery repair, materials processing, and other non-retail uses. Recommended land uses in these areas include industrial, commercial, public institutional, mixed-use commercial, development node, agricultural/forestry, and transportation/communication/utilities.

The proposed land application system is compatible with this character area. It fits both the category of utility land use, and its treatment of industrial wastewater would support surrounding industrial & commercial establishments.

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 following table outlines the proposal's alignment with these recommendations:

REGIONAL PLAN RECOMMENDATIONS	PROPOSED PROJECT'S COMPATIBILITY WITH RECOMMENDATION
Enhances economic mobility and competitiveness	The proposed LAS would allow more of the ASEWRF's capacity to go toward municipal wastewater treatment and keep the same amount of industrial wastewater treatment. This would enable additional economic growth in the area. The applicant states that the regional workforce is sufficient to fill the demand created by the project.
Elevates public health and equity	The area around the proposed LAS is primarily industrial and agricultural. It is unlikely that it would pose any public health hazards or exacerbate inequity.
Supports and adds value to existing communities	The proposed LAS would support recent and expected future housing growth in the area by reserving additional capacity of the ASEWRF for municipal wastewater without sacrificing industrial wastewater capacity.
Creates 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 new housing development.
Includes transportation choices and is well-connected with existing and planned transportation options	The applicant states that the proposed LAS would create very little additional traffic.
Protects natural and historic resources	There are multiple sensitive environmental areas surrounding the proposed LAS, including the Little River, Dennis Creek, and associated wetlands. The site should be monitored to ensure that pollutants are not released through the proposed LAS. Additionally, there are two archaeological sites in the proposed site, including a cemetery and a 19th century home site. While the proposed site plan proposes a 300-foot buffer around each, the proposed site should be designed so that these resources are not impacted.

Middle Ocmulgee Regional Water Plan

The 2023 regional water plan includes six goals. The proposed LAS would support one of them as summarized in the table below.

Regional Water Plan Compatibility

RELATED REGIONAL WATER PLAN GOALS	PROPOSED PROJECT'S COMPATIBILITY WITH RECOMMENDATION
Goal 4. Promote properly managed wastewater discharges and beneficial reuse.	The proposed LAS would treat industrial wastewater and preserve the additional capacity of the ASEWRF. If the system is well maintained and pollutants are monitored, it would properly treat wastewater and return nutrients to the environment.

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. 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 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 304 Acres	Wetland Acres[1]	19	6.2%
	"Conservation Land" [2]	302	99.2%
	Regionally Important Resource Land[3]	299	98.3%
	Threatened Regionally Important Resource Land[4]	301	98.9%
1 MILE BUFFER AROUND SITE (4,402 Acres)	Wetland Acres	206	4.7%
	"Conservation Land"	4,013	91.2%
	Regionally Important Resource Land	2,918	66.3%
	Threatened Regionally Important Resource Land	3,282	74.5%

A portion of the RIR acreage above 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). 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 Regionally Important Resource sites are identified within one mile of the proposed site.

Transportation

The applicant estimates that the proposed project would generate 10 new daily trips. No transportation improvements would be needed to serve the project.

Water Supply and Wastewater

The proposed project would be served by the Newton County water and sewer systems with an estimated daily demand of <0.005 MGD for each system. The applicant states that these demands can be covered by existing capacity. No water or sewer line extensions are anticipated outside what is included in the LAS.

Stormwater Management

[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).

Less than 1% of the site would be covered in impervious surfaces, and no retention ponds are planned to manage stormwater runoff.

Solid Waste

The applicant estimates the proposed LAS would generate no additional solid waste.

Lifecycle Costs and Revenues

The applicant estimates that the proposed land application system would be worth $13.2 million at build-out in 2025, or $44,000 per acre. 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 can cover.

Comments from Affected Parties

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

This proposed construction of a 300-acre land application system (LAS) is 8 miles from the nearest open-to-the-public civil airport. It is located outside of the FAA approach or departure surfaces, and airport compatible land use areas, and does not appear to impact any 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.