

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 #4314
Name of Project:	Mahaffey Pickens Tucker, LLP
Name of Host Jurisdiction:	City of Commerce

Background

DRI review was initiated following the developer’s request for rezoning and annexation. Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 10/29/2024 to 11/13/2024.

Proposed Development

Taylor & Mathis, Inc., is proposing construction of approximately one million square feet of warehouse, distribution center, and office space on a 122-acre site on Steve Reynolds Industrial Parkway. Approximately one-fifth of the site is within the City of Commerce (Parcel 020 008) and is currently zoned C-2 (“General Commercial”). The rest of the site (Parcel 020 002) is in unincorporated Jackson County and is currently zoned A-2 (“Agricultural Rural Farm”), and all but 6 acres of this parcel would be annexed into Commerce. The 6 acres remaining in unincorporated Jackson County would retain the existing A-2 zoning, and the other 116 acres of the site would be rezoned to Commerce’s M-1 District (“Light Industrial”).

The site plan includes 468 automobile parking spaces, 225 truck parking spaces, 215 additional “future” truck parking spaces, and four proposed stormwater management areas totaling approximately 6 acres. There would be two vehicular entrances to the site, both from Steve Reynolds Industrial Parkway. Currently the site is mostly wooded, and there are streams and floodplains on both the east and west edges of the site. No development is proposed within the floodplain areas. The project would be completed in one phase with an estimated completion date in October 2026.

Compatibility with Existing Plans

Compatibility with Commerce Comprehensive Plan

The portion of the site within the City of Commerce is identified as “Highway Commercial” on the Character Areas Map in Commerce’s Comprehensive Plan (dated 3/15/2021). The Highway Commercial character area is described in the Commerce Comprehensive Plan as consisting of “predominantly automobile-service commercial uses” with “larger-scale lodging, big box retail, convenience stores, auto sales, and chain restaurants and retail.” The zoning category listed as appropriate for this character area is C-2 (“General Commercial”).

Neither the proposed industrial use nor the proposed light industrial zoning category are listed as appropriate with the Highway Commercial character area narrative, so the proposed warehouse/distribution center is not compatible with the Highway Commercial Character Area. However, the proposal is consistent with the Industrial Workplace Character Area, which borders the project site, so Commerce could expand the Industrial Workplace Character Area to include the project site without disrupting the overall organization or intent of the Character Area map.

Compatibility with Jackson County Comprehensive Plan

The portion of the site within unincorporated Jackson County is identified as “Urban” on Jackson County’s current Character Areas Map and as “Industrial” on Jackson County’s current Future Land Use Map. The Urban Character Area narrative lists industrial uses as “permitted and encouraged in locations per plan.” The Industrial Future Land Use category is described as including “land dedicated to industrial uses, including warehouses, wholesale trade facilities, research and development facilities, and manufacturing operations, processing plants, factories, and mining or mineral activities.” The proposed warehouse/distribution center aligns well with Jackson County’s Character Area and Future Land Use narratives for this parcel.

Compatibility with Regional Plan

The site is identified as “Developed” 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	<p>The proposal would create new openings for warehouse/distribution center jobs, and the function of a warehouse and distribution center is to facilitate the movement of goods.</p> <p>There are some existing distribution centers and other light industrial facilities near the project site, so the local government should consider the area’s available workforce, as well as employment levels at similar businesses nearby, to determine whether the existing workforce has a sufficient demand for additional warehouse/distribution jobs to fill the positions created by the proposed project, or whether additional workers would need to be recruited from outside the region.</p>
Elevates public health and equity	No elements of the proposed project were identified that relate to elevation of public health or equity.
Supports and adds value to existing communities	The proposal has the potential to add value to the existing community if the employment opportunities offered by the proposed development align with the employment needs of the local workforce.
Creates housing that is diverse, adequate, equitable, and affordable	Not applicable to this project type.
Includes transportation choices and is well- connected with existing and planned transportation options	The project’s proximity to I-85 and US-441 makes it well-connected with existing road infrastructure for the movement and distribution of goods. These routes would also make it convenient for employees to drive to the job site. However, there do not appear to be transportation options that would allow employees without automobiles to access the site. Additionally, the traffic study identifies that several intersections near the project site already fail traffic level-of-service assessments, so infrastructure improvements like those outlined in the study and summarized in the transportation section (below) are needed to prevent traffic from the proposed project from exacerbating existing traffic issues.
Protects natural and historic resources	The proposal includes required riparian buffers and several stormwater ponds. No construction is proposed within the floodplain or in the portion of the site identified as having slopes steeper than 25%. Beyond these required protections, no additional natural or historic resource protections were identified.

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. The applicant estimates that 23% of the site would be covered in impervious surfaces, and 4 stormwater management ponds are planned to manage runoff. The proposal should be designed to minimize disruption to the existing streams, associated wetlands, and floodplain 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 (122.5 acres)	Wetland Acres ¹	1.5	1.2%
	“Conservation Land” ²	9.8	8.0%
	Regionally Important Resource Land ³	0.0	0.0%
	Threatened Regionally Important Resource Land ⁴	9.8	8.0%
1 MILE BUFFER AROUND SITE (3250.8 acres)	Wetland Acres	100.3	3.1%
	“Conservation Land”	183.4	5.6%
	Regionally Important Resource Land	0.0	0.0%
	Threatened Regionally Important Resource Land	183.4	5.6%

No specific Regionally Important Resource sites are identified within one mile of the proposed site.

Transportation

SEI Engineering, Inc., and Acampora Traffic, LLC., completed a traffic impact study that projects 1,710 new daily trips, including 151 AM peak hour trips and 154 PM peak hour trips from the proposed development. The study estimates that trucks will represent 14% of the AM trips, 21% of the PM trips, and 34% of the daily trips. The traffic study recommends infrastructure improvements at several of the study intersections:

- SR 98 at I-85 Southbound Ramps: The study recommends consideration of signalization at this intersection. They recommend this improvement even if the proposed project is not built.
- SR 98 at I-85 Northbound Ramps: The study recommends adding an eastbound right turn overlap phase to the signal, to provide a protected right turn arrow. They recommend this improvement regardless of whether the proposed project is built. The study also notes that additional capacity may be needed at this intersection in the future as volumes continue to increase.
- SR 98 at Steve Reynolds Industrial Parkway / Nunn Road: The study recommends changing this intersection from side street stop sign control to a roundabout.
- Steve Reynolds Industrial Parkway at Ridgeway Church Road: The study recommends changing the control at this intersection, such as to a side street stop sign control, a roundabout, or a signal.
- US 441 at Steve Reynolds Industrial Parkway: The study recommends adding an eastbound right turn lane and potentially signalizing this intersection.
- Steve Reynolds Industrial Parkway at Project Accesses: For each access, the study recommends an eastbound left turn lane and westbound right turn lane on Steve Reynolds Industrial Parkway, one entering lane, and one exiting lane controlled by a stop sign and stop bar.

Water Supply and Wastewater

The project would be served by the City of Commerce water and sewer systems with an estimated daily demand of 0.141 MGD for the water system and 0.115 MGD for the wastewater system. The applicant states that these water demands can be covered by existing capacity, and that while there is currently not sufficient wastewater capacity available to serve the process, the City’s planned new wastewater treatment facility will

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).

have sufficient capacity to serve this site. They also note that if the proposed development is completed before the new wastewater treatment plant, the developer will install a temporary septic system on site. No water or sewer line extensions are anticipated.

Solid Waste

The applicant estimates the project would generate 1,500 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 Jackson County is disposed of in a landfill in Banks County. The applicant states that no hazardous waste would be generated.

Lifecycle Costs and Revenues

The applicant estimates that the project would be worth approximately \$20 million at build-out in 2026 and generate \$250,000 in annual local taxes. On a per-acre basis, the project would be worth approximately \$163,934 and generate approximately \$2,049 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

Jonathan Peevy, District Traffic Engineer, Georgia Department of Transportation District 1

We will require this development to make improvements at the intersections of US 441 @ Steve Reynolds (study required) as well as perform a full investigation of the intersections of SR 98 @ Steve Reynolds and the I-85 ramps at SR 98.

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

This one million square feet of warehouse, distribution center, and office space on a 122 - acre tract in Jackson County is 6.7 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.