

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 #4444
Name of Project:	Hard Labor Creek Water Treatment Facility
Name of Host Jurisdiction:	Walton 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 4/25/2025 to 5/10/2025.

Proposed Development

Walton County Water & Sewerage Authority is proposing construction of a water treatment plant on an approximately 27.4-acre site in Walton County. The plant would treat raw water from the Hard Labor Creek Reservoir to produce municipal drinking water. The proposed facility would include a raw water intake and pump station, a raw water flow meter, chemical feed systems, pretreatment units for rapid mix, flocculation and sedimentation, filter building with gravity filters, a water storage tank, an electrical building, process residuals lagoons, an operation building, bulk chemical tanks, and water supply lines. The site would have two entrances off Social Circle Fairplay Road. Currently, the site is wooded. The proposed development would occupy property at 445 Social Circle Fairplay Road, adjacent to the Hard Labor Creek Reservoir in Walton County. The parcel number is C1850007. The project would be completed in 3 phases with an estimated completion date in September 2027.

Compatibility with Existing Plans

Compatibility with Regional Plan

The site is identified as "Rural" 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 applicant states that the regional workforce is sufficient to meet the demand created by the proposed project.</p> <p>Increasing the county's water treatment capacity would enable future growth in the area, enhancing the economic competitiveness of Walton County.</p>
Elevates public health and equity	The project would improve public health by increasing the number of homes and businesses that have access to municipal drinking water.
Supports and adds value to existing communities	The proposed development would add value to the community by expanding the county's water supply infrastructure and planning for future needs.
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	Transportation improvements are not necessary to serve the proposed project, as it is estimated to generate only 15 new daily trips.
Protects natural and historic resources	<p>Hard Labor Creek is a Regionally Important Resource (RIR) identified within one mile of this site. The developer should preserve as much existing vegetation on the site as possible and ensure that elevated stormwater retention measures are used to avoid the negative effects of runoff into the Hard Labor Creek Reservoir.</p> <p>Walton County is a part of the Upper Oconee Water Planning Region. The local government should ensure that the project aligns with the Regional Water Plan's objectives to protect water quality and promote efficient water use.</p> <p>An existing cemetery is located on the northern portion of the site, and no development is proposed within its boundaries.</p>

Compatibility with Regional Resource Management Plan

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 (29 Acres)	Wetland Acres ¹	0	0%
	“Conservation Land” ²	29	100%
	Regionally Important Resource Land ³	29	100%
	Threatened Regionally Important Resource Land ⁴	0	0%
1 MILE BUFFER AROUND SITE (2865 Acres)	Wetland Acres	120	4.2%
	“Conservation Land”	2396	83.6%
	Regionally Important Resource Land	2071	72.3%
	Threatened Regionally Important Resource Land	0	0%

The site 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). 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.

Hard Labor Creek is a Regionally Important Resource located within one mile of the proposed development. Therefore, the local government should carefully consider the impacts of land clearing, development, and any land application activities on the proposed site as it could have negative downstream impacts on sensitive resources and aquatic life.

Potential Interjurisdictional Impacts

Natural Resources and Stormwater Management

The site is located adjacent to the Hard Labor Creek Reservoir and a 100-year flood zone. The applicant states that an estimated 6.4% of the site would be covered in impervious surfaces. According to the applicant, the site will have a 150-foot buffer around the reservoir, bioretention ponds, and waste lagoons to mitigate stormwater runoff.

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 applicant states that the project is likely to affect water supply watersheds.

Transportation

No traffic study was submitted for the proposed development. The applicant estimates that the project would produce 15 new daily trips.

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).

Water Supply and Wastewater

The project would be served by the Walton County Water and Sewerage Authority with an estimated daily demand of 0.18 MGD for the water system. The applicant states that this demand can be covered by existing capacity. A 12.3-mile water line extension would be required to serve this project. The property is served by a septic tank and there would be no wastewater flow generated from the proposed development.

Solid Waste

The applicant estimates the project would generate 60 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 Walton County is disposed of in a landfill in Barrow County. The applicant states that no hazardous waste would be generated.

Lifecycle Costs and Revenues

The applicant estimates that the project would be worth \$181,000,000 at build-out in 2027. On a per-acre basis, the project would be worth approximately \$6,605,839. The project is a government facility and would not generate any local 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 county tax revenue can cover.

Comments from Affected Parties

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

This proposed water treatment plant more than 6 miles from any 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.