

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 #4476
Name of Project:	Providence Point
Name of Host Jurisdiction:	City of Commerce

Background

DRI review was initiated following the developer's request for a permit and a rezone from Two-Family Residential (R3) to Planned Unit Development (PUD). Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 5/23/2025 to 6/7/2025.

Proposed Development

NVR, Inc. is proposing the construction of 450 residential units and 2.8 acres of commercial development on an approximately 162-acre site in the City of Commerce. The new mixed-use development would include detached single-family homes and town homes, as well as a walking trail system, clubhouse, pool, playground, pickleball courts, dog park, and a mail kiosk. The business for the commercial area has not yet been decided. The proposed development would occupy property north of Georgia Highway 98; the parcel numbers are 010 046 and 010 002. The development would have two entrances off GA Hwy 98 (Ila Road). Currently, the site is undeveloped and wooded. The project would be completed in three phases with an estimated completion date in 2029, three years after the start of construction.

Compatibility with Existing Plans

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 proposed development would add 450 housing units within 1.5 miles of downtown Commerce, expanding the customer base for local businesses. The development would also support a growing workforce population by increasing the housing supply.</p> <p>The applicant states the regional workforce is sufficient to meet the demand created by the proposed project.</p>
Elevates public health and equity	<p>The proposed development would elevate public health for the residents of the neighborhood by providing access to walking trails and amenity areas, including a junior Olympic pool, pickleball court, and playground. Public access to these amenities should be considered by the local government and developer prior to approval to maximize health and equity benefits within the city.</p>
Supports and adds value to existing communities	<p>The project would provide additional housing units, outdoor amenities, and new commercial development to the existing community.</p>
Creates housing that is diverse, adequate, equitable, and affordable	<p>The proposal includes 450 new housing units that range in size and cost. The estimated value of each lot is \$300,000.</p>
Includes transportation choices and is well- connected with existing and planned transportation options	<p>The proposed site plan includes two connections to the existing road network on Ila Road at the southern end of the development. The developer should consider adding additional connections at Belmont Park Drive, Shankle Road, and Veterans Memorial Highway (if allowable). This would provide direct access to the neighborhoods on the north and west side of the development, improve connectivity for future residents and service providers, and better integrate this proposal into the city’s existing street network.</p>
Protects natural and historic resources	<p>The proposed development includes a 50-ft impervious buffer around the creek and one of the existing ponds on site. The development also includes reduced building setbacks for residential units, allowing for smaller lot sizes and the preservation of shared greenspace throughout the development.</p> <p>The developer should consider including permeable pavement in target areas throughout the site to minimize the volume of stormwater runoff generated by the development.</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 (162 Acres)	Wetland Acres ¹	4.0	2.5%
	"Conservation Land" ²	4.0	2.5%
	Regionally Important Resource Land ³	0.0	0.0%
	Threatened Regionally Important Resource Land ⁴	4.0	2.5%
1 MILE BUFFER AROUND SITE (3,517 Acres)	Wetland Acres	72.0	2.0%
	"Conservation Land"	301.0	8.6%
	Regionally Important Resource Land	0.7.0	0.0%
	Threatened Regionally Important Resource Land	201.0	5.7%

Governor L.G. Hardman House is a regionally important resource located within one mile of the proposed development. The proposed project aligns with the existing residential and commercial development in the surrounding area and is therefore not expected to have any adverse impact on the Governor L.G. Hardman House.

Potential Interjurisdictional Impacts

Natural Resources and Stormwater Management

There are 2 ponds, a stream, and 5 identified wetland areas located on the proposed site. The applicant states that an estimated 15% of the site would be covered in impervious surfaces. The site plan includes a 25-foot state waters buffer and a 50-foot impervious buffer surrounding the existing stream and one of the ponds. Additionally, 4 detention and retention ponds are planned to manage stormwater runoff. The proposed development would require approval from the Georgia Soil and Water Conservation Commission (GSWCC). 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 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.

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).

Transportation

WMB Engineering completed a traffic impact study that projects 4,081 new daily trips, including 335 AM peak hour trips and 402 PM peak hour trips from the proposed development. The traffic study recommends installing a right-turn deceleration lane at each site entrance on GA Hwy 98, as well as channelized left and right turn lanes for vehicles exiting the development onto GA Hwy 98.

The comments included in the previous “Regional Plan Recommendations” table offer suggestions for how to improve connectivity and alleviate any potential traffic burdens of the newly generated trips.

Water Supply and Wastewater

The project would be served by the City of Commerce water and sewer systems with an estimated daily demand of 193,200 GPD for the water system and 180,000 GPD for the sewer system. The applicant states that these demands can be covered by existing capacity. No water or sewer line extensions are anticipated.

Solid Waste

The applicant estimates the project would generate 1,478,250 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 \$135,000,000 at build-out in 2029 and generate \$135,304 in annual local taxes. On a per-acre basis, the project would be worth approximately \$833,333 and generate approximately \$835 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

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

The proposed construction of 450 residential units and 2.83 acres of commercial space on a 161.8-acre tract in the City of Commerce is more than 7 miles from the Jackson County Airport (JCA). It is located outside of the FAA approach or departure surfaces, and airport compatible land use areas, 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.

Jamie Dove, Public Development Director, Jackson County Department of Public Development

See attached letter for comments.



DEPARTMENT OF PUBLIC DEVELOPMENT

Planning • Building Inspections • Code Compliance • Storm Water Management

June 6, 2025

Beck Pirkle
Northeast Georgia Regional Commission
305 Research Drive
Athens, GA 30605

RE: DRI # 4476 – Providence Point, City of Commerce

Ms. Pirkle,

Jackson County Public Development staff has reviewed the DRI package distributed for review and would like to address a few discrepancies found:

- The proposed development details differ throughout the package. Per the submitted DRI application and "Request for Rezone" prepared by Carter Engineering Consultants, there will be a total of 450 single-family homes. Further within the package, the "Zoning Impact Analysis", also prepared by Carter Engineering Consultants, describes the development to consist of approximately 483 residential homes with a mix of single-family and townhomes.
- The density is listed to be 2.70 lots per acre in the "Conceptual Site Plans", while the "Zoning Impact Analysis" notes the density to be 4 units per acre. The concept plans also show the smallest lot size as 5,868.07 ft² and the analysis lists the minimum lot size as 10,890 ft².
- Both parcels, 010 002 and 010 046, are listed as currently being zoned R-3. The request for rezone asks that the parcels be rezoned to PUD while the analysis states a rezone is not being proposed, only a variance to the minimum lot size, side setbacks, and 1.67 acres zoned commercially. According to the request for rezone documents, reductions to the front, side, and rear property lines are proposed, while the analysis only stated a reduction down to 12 feet on the side setbacks.

Regardless of any discrepancies, it is important to highlight that within Unincorporated Jackson County, the maximum permissible density for this single-family residential development served by public water and sanitary sewer systems would be approximately 259 lots. This calculation includes an allowance for roadways and right-of-way areas. However, it does not account for necessary reductions due to State and County-imposed stream buffers and stormwater management requirements.

We are appreciative of the opportunity to comment and the work it requires to coordinate these reviews.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Dove".

Jamie Dove, Public Development Director