

Atlanta Regional Commission
200 Northcreek, Suite 300
3715 Northside Parkway
Atlanta, Georgia 30327-2809



Harry West
Director

August 25, 1999

Honorable Charles Camp, Mayor
City of Douglasville
P.O. Box 219
Douglasville, GA. 30133

RE: Development of Regional Impact
Touchet Industrial Development

Post-it® Fax Note 7671		Date 12-14	# of pages ▶
To Sandra Kerry	From B. Rhea		
Co./Dept.	Co. ARC		
Phone #	Phone #		
Fax #	Fax #		

Call EPD NW Reg Office 404-364-2562

Dear Mayor Camp:

I am writing to officially transmit the Atlanta Regional Commission's finding on the Development of Regional Impact (DRI) review of the Touchet Industrial Development. Since you were at the meeting you know that the Commission found this DRI is not in the best interest of the State.

I am enclosing copies of the Commission's resolution on the review, our review report, additional information submitted by the developer, and solicited and unsolicited comments received during the review. Please feel free to call me or Beverly Rhea (404-364-2562) if you have any questions about the review.

Sincerely,

Harry West
Director

Enclosures

C Ms. Michelle Wright, City of Douglasville
Mr. Craig Touchet, Touchet Development, LLC
Hon. Rita Rainwater, Douglas County
Hon. Gail Hale, Douglas County
Hon. Johnny Groover, Douglas County
Mr. Wayne Shackelford, GDOT
Mr. Harold Reheis, GEPD
Mr. Rick Brooks, GDCA

DEVELOPMENTS OF REGIONAL IMPACT

REVIEW REPORT

PROPOSED DEVELOPMENT: Quarry, asphalt plant, cement plant, cement recycling facility, and warehousing proposed to be located on West Strickland Street west of South Flat Rock Road in the City of Douglasville.

GENERAL

According to information on the review form or comments received from potentially affected governments:

Is the proposed project consistent with the host-local government's comprehensive plan? If not, identify inconsistencies.

Information submitted with the review states that the proposed use is consistent with the Douglasville Comprehensive Plan. Apparently this is a reference to a proposed 1998 amendment to the City's Plan as the last Douglasville Plan reviewed by ARC and approved by DCA does not include the western part of the site submitted for DRI review.

Is the proposed project consistent with any potentially affected local government's comprehensive plan? If not, identify inconsistencies.

No. The site adjoins property in unincorporated Douglas County that is zoned for residential development. It also adjoins property in the unincorporated area that is used for Camp Inagehi, a Church of Christ summer camp/retreat. The proposed Touchet Industrial Development is incompatible with residential and church uses.

Will the proposed project impact the implementation of any local government's short-term work program? If so, how?

No impacts to short-term work programs were identified.

Will the proposed project generate population and/or employment increases in the Region? If yes, what would be the major infrastructure and facilities improvements needed to support the increase?

The proposed expansion will generate 100 short-term and 50 long-term jobs according to information submitted with the review. The development proposes a new crossing of the railroad tracks to tie West Strickland Street to Bankhead Highway. However, there are questions as to whether this can be allowed. (See discussion under Transportation.)

What other major development projects are planned in the vicinity of the proposed project?

The site is slightly east of Douglas Waste Services Construction & Demolition Debris Landfill reviewed by ARC. It is ARC's understanding that this landfill was not approved by the County.

Will the proposed project displace housing units or community facilities? If yes, identify and give number of units, facilities, etc.

No.

Will the development cause a loss in jobs? If yes, how many.

No.

LOCATION

Where is the proposed project located within the host-local government's boundaries?

The site of the proposed quarry, asphalt plant, cement plant, cement recycling facility, and warehousing is on the north side of West Strickland Street and the west side of South Flat Rock Road. It includes extensive frontage on Southern Railway. 84° 47'30"/33°44'45"

Will the proposed project be located close to the host-local government's boundary with another local government? If yes, identify the other local government.

Yes, the development site extends to the city limits of Douglasville. Areas to the west and north of the proposed development are located in unincorporated Douglas County.

Will the proposed project be located close to land uses in other jurisdictions that would benefit or be negatively impacted by the project? Identify those land uses which would benefit and those which would be negatively affected and describe impacts.

The use of this site for a rock quarry, asphalt plant, cement plant, cement recycling facility, and warehousing will negatively impact surrounding land uses. There are adjoining lands in unincorporated Douglas County that are zoned for residential use and also lands in the unincorporated area that are owned and used by the Church of Christ for a summer camp/retreat. Blasting and grinding of rock and production of asphalt will create vibration, noise, dust, and odors that are incompatible with residential and camp/retreat land uses.

ECONOMY OF THE REGION

According to information on the review form or comments received from potentially affected governments:

What new taxes will be generated by the proposed project?

\$500,000 based on a \$25,000,000 build-out value.

How many short-term jobs will the development generate in the Region?

100 plus 50 long-term according to information submitted with the review.

Is the regional work force sufficient to fill the demand created by the proposed project?

Yes.

In what ways could the proposed development have a positive or negative impact on existing industry or business in the Region?

The development would provide construction materials (rock, asphalt, cement).

NATURAL RESOURCES

Will the proposed project be located in or near wetlands, groundwater recharge area, water supply watershed, protected river corridor or other environmentally sensitive area of the Region? If yes, identify those areas.

In what ways could the proposed project create impacts that would damage or help to preserve the resource?

The site is contiguous to an area identified as Camp Inagehi and a small pond at the Camp. It drains into Goddard's Creek which flows into Gothard's Creek which flows into Sweetwater Creek. Sweetwater Creek has a large (over 100 square miles) watershed and provides water supply for the City of East Point. The development plan includes an existing storm water quality pond and basin and proposes a water quality reuse lake before the drainage into Camp Inagehi's lake as well as four other storm water quality basins west and southeast of the quarry. However, comments received during the review state that work on the site has already damaged the lake at Camp Inagehi. In addition, the Douglasville-Douglas County Water and Sewer Authority has a discharge permit for the Gothard's Creek watershed and their consultant has recommended that local governments in the watershed take steps to improve total stream quality in order for the Authority to maintain the discharge permit.

Stream Buffer

The proposed development lies topographically on a ridge between two adjacent sub-watersheds, both of which serve as tributaries to Goddard's Creek which eventually flows into Sweetwater Creek. Due to the surface area that would be cleared for this development and the steep topography of the area, ARC staff recommends that natural resources surrounding the proposed development must be heavily buffered for the protection of water quality and stream health if this project moves forward. Buffers should be maintained permanently by use of a permanent property deed defining the buffer areas as ineligible for clearing or development and as being left in a natural, undisturbed state.

U.S. Environmental Protection Agency (EPA) documentation states that asphalt and concrete plants are potential sources of water contaminants such as barium, lead, benzene, dichloromethane, methylene chloride, ethylbenzene, styrene, tetrachloroethylene, toluene, and xylenes, all of which are potentially hazardous materials. Additionally, sediment runoff could likely be a significant problem, posing an additional threat to the natural resources of the region. If protective regulations such as sizeable buffers and stormwater retention ponds are not enforced, there may be a threat of contamination to Goddard's Creek and potentially to Sweetwater Creek. Careful monitoring of contamination from both the recycled and produced materials, as well as monitoring of surface water sources is essential if the development occurs.

Stormwater/Water Quality

If this development is approved, the project should conform to established erosion and sediment control requirements during construction. Additionally steps should be taken to limit the amount of **general** pollutants that will be produced during and after construction.

The amount of **general** (see above for specifics related to asphalt and concrete plants) pollutants that will be produced after construction of the proposed development was estimated by ARC staff. These estimates are based on some simplifying assumptions for typical pollutant loading factors (lbs/ac/yr). The loading factors are based on the results of regional stormwater monitoring data from the Atlanta region. The following table summarizes the results of this analysis.

Estimated Pounds of Pollutants Per Year

Land Use	Land Area (est. acres)	Total Phosphorous	Total Nitrogen	BOD	TSS	Zinc	Lead
Heavy Industrial	88.3	128.1	1,699.3	11,305.0	70,214.4	146.6	18.6
Office/Lt. Ind	44.2	57.0	756.5	5,034.2	31,265.3	65.4	8.4
Total	132.5	185.0	2,455.8	16,339.2	101,479.7	212.0	26.9

Air Quality

The Atlanta region along with three other surrounding counties is classified as a serious non-attainment area for ozone under Federal air quality standards. A potential additional problem is particulate matter. Development of rock quarries, asphalt and cement plants, and concrete recycling would produce particulate matter and this is a concern to the Atlanta Regional Commission.

HISTORIC RESOURCES

Will the proposed project be located near a national register site? If yes, identify site.

No.

In what ways could the proposed project create impacts that would damage the resource?

Not applicable

In what ways could the proposed project have a positive influence on efforts to preserve or promote the historic resource?

Not applicable.

INFRASTRUCTURE

Transportation

How much traffic (both average daily and peak am/pm) will be generated by the proposed project?

Information submitted with the review indicates 500 truck trips daily—250 loads of material leaving the site.

What are the existing traffic patterns and volumes on the local, county, state and interstate roads that serve the site?

It is unclear at this time what route trucks entering and leaving the site would follow. The plan submitted for review by ARC included a new crossing of the Southern Railway to connect West Strickland Street to Bankhead Highway. See discussion below as to whether this could be allowed. Later information submitted by the developer shows land extending all the way to Cedar Mountain Road and states that this road allows heavily loaded trucks and provides a more direct route to northwest Douglas and Paulding Counties and therefore the development will help to re-direct truck traffic off of the very congested routes of Bankhead Highway and Highway 92.

What transportation improvements are under construction or planned for the Region that would affect or be affected by the proposed project? What is the status of those improvements (long or short range or other)?

The development plan submitted for review includes an additional crossing of the Southern Railway to connect West Strickland Street to Bankhead Highway. While the developer of the proposed industrial facility states that he will pay for the proposed four-lane at-grade crossing, it is unclear at this time whether Southern Railway will allow the crossing, particularly if one or more existing crossings is not closed. It is also unclear at this time whether an additional or new location, capacity-increasing crossing can be constructed given the Region's non-attainment status on air quality. And it is unclear at this time whether any new or relocated crossing would have to be part an ARC Regional Transportation Plan and Transportation Improvement Program that conforms to the emissions budget in the State Implementation Plan for air quality.

Will the proposed project be located in a rapid transit station area? If yes, how will the proposed project enhance or be enhanced by the rapid transit system?

No.

Is the site served by transit? If so, describe type and level of service.

No.

Are there plans to provide or expand transit service in the vicinity of the proposed project?

Not at this time.

What transportation demand management strategies does the developer propose (carpool, flex-time, transit subsidy, etc.)?

The site is located on the Southern Railway with a spur onto the site. The plan includes the rock quarry, asphalt plant, and cement plant on the same site so that rock would be available on-site to provide raw material for both the asphalt and cement plants. In addition both raw and processed materials could be hauled on and off site by rail. However, at the time of the review by the Commission's Environment and Land Use Committee (ELUC), the developer had not agreed to employ other measures such as clean fueled vehicles on site in order to meet the Commission's required 15 percent air quality benchmark. After the ELUC action, information was received from the developer's consultant stating that clean burning natural gas will be utilized in all on-site vehicles as well as all processing equipment if the development goes forward.

What is cumulative trip generation of this and other DRI's or major developments? Is the transportation system (existing and planned) capable of accommodating these trips?

Not applicable. No other DRI's have been approved by the local governments in close proximity to this site.

INFRASTRUCTURE

Wastewater and Sewage

How much wastewater and sewage will be generated by the proposed project?

According to information submitted with the review, only 0.01 MGD wastewater will be generated.

Which facility will treat wastewater from the project?

The development plan shows a sewer easement and pump station. The site plan indicates a tie to the existing City of Douglasville sewer system. Possibilities for providing sewer service to the area would be running a force main to allow service at Douglasville's Northside plant or boring under the railroad and U.S. 78 to allow service at the Southside plant.

What is the current permitted capacity and average annual flow to this facility?

Northside= 0.6 with 0.45 1998 monthly average and 0.514 maximum monthly average
Southside= 3.25 with 2.4 1998 monthly average and 2.816 maximum monthly average

What other major developments will be served by the plant serving this project?

Dependent on which alternative, if either, is selected for service.

INFRASTRUCTURE

Water Supply and Treatment

How much water will the proposed project demand?

Water demand is projected to be minimal—0.01MGD. The development plan indicates a water re-use lake on the site.

How will the proposed project's demand for water impact the water supply or treatment facilities of the jurisdiction providing the service?

Little impact.

INFRASTRUCTURE

Solid Waste

How much solid waste will be generated by the project? Where will this waste be disposed?

Information submitted with the review indicates 10 tons of solid waste per year.

Other than adding to a serious regional solid waste disposal problem, will the project create any unusual waste handling or disposal problems?

No. However, see previous discussion concerning EPA documentation on potentially hazardous water contaminants from asphalt and concrete plants.

Are there any provisions for recycling this project's solid waste.

None stated.

INFRASTRUCTURE

Other facilities

According to information gained in the review process, will there be any unusual intergovernmental impacts on:

- **Levels of governmental services?**
- **Administrative facilities?**

- Schools?
- Libraries or cultural facilities?
- Fire, police, or EMS?
- Other government facilities?
- Other community services/resources (day care, health care, low income, non-English speaking, elderly, etc.)?

No.

HOUSING

Will the proposed project create a demand for additional housing?

Negligible demand.

Will the proposed project provide housing opportunities close to existing employment centers?

No.

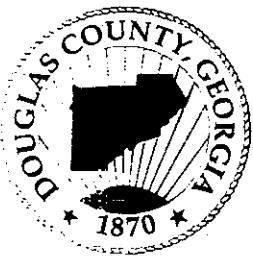
Is there housing accessible to the project in all price ranges demanded?

Yes.

Is it likely or unlikely that potential employees of the proposed project be able to find affordable housing?

Likely.

SOLICITED COMMENTS



DOUGLAS COUNTY BOARD OF COMMISSIONERS

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District IV

July 29, 1999

Ms. Beverly Rhea, Review Coordinator
Atlanta Regional Commission
200 Northcreek, Suite 300
3715 Northside Parkway
Atlanta, GA 30327-2809

Dear Beverly:

We have received the Development of Regional Impact (DRI) report regarding the proposed quarry, asphalt plant and cement plant complex to be located in the City of Douglasville. Douglas County is opposed to this DRI for the following reasons.

The property in question is located at the boundary of the City of Douglasville and an industrial/commercial district. The property adjoins single-family residential zoned property in the unincorporated area and no further expansion of industrial property is planned in the area.

The property is also located in the Gothards Creek watershed. The Douglasville-Douglas County Water and Sewer Authority has a discharge permit in this watershed. A recent study by the Water and Sewer Authority recommends the local jurisdictions take steps to improve total stream quality of Gothards Creek to maintain the discharge permit. The proposed quarry, asphalt plant and cement plant is not compatible with the study recommendations.

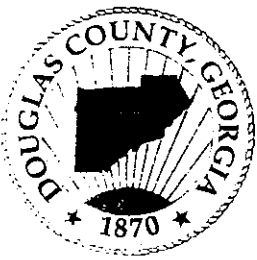
A religious camp, Camp Inagehi, is located to the rear of the proposed site. There are concerns that the existing and future use of the proposed quarry, asphalt and cement plant property will contaminate a lake located on the Camp Inagehi property.

Finally, potential emissions from the proposed asphalt and cement plants are contrary to local and regional air-quality goals. Please consider these comments in your evaluation.

Sincerely,

Rita Rainwater, Chairman
Board of Commissioners

Cc: Pete Frost, WSA Director



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District IV

August 3, 1999

Ms. Beverly Rhea, Review Coordinator
Atlanta Regional Commission
200 Northcreek, Suite 300
3715 Northside Parkway
Atlanta, GA 30327-2809

Dear Beverly,

Thank you for sending the Development of Regional Impact (DRI) information. I am emphatically opposed to this quarry, asphalt and cement complex being located in the City of Douglasville,

The Water and Sewer Authority recommends steps be taken to improve the stream quality of Gothards Creek and this cannot be accomplished with the proposed quarry, asphalt plant and cement plant since it is located in the Gothards Creek watershed.

We have two quarries in the county already and I see no need for another one. The proposed location is not in the best interest of the community and would only serve to benefit Touchet Development.

Camp Inagehi, a religious camp which is also located on this site, has a lake that would possibly be contaminated by the proposed quarry, asphalt and cement plant.

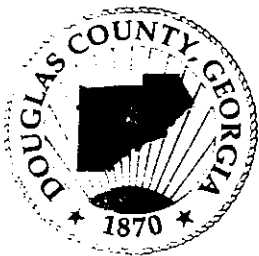
Please evaluate these comments before a decision is made.

Sincerely,

Gail Hale, District 4
Commissioner



Persons With Hearing Or Speech Disabilities Who Need To Contact Douglas County May Place Their Call Through The Georgia Relay Center At (800) 255-0056 (Text Telephone) Or (800) 255-0135 (Voice Telephone).



DOUGLAS COUNTY BOARD OF COMMISSIONERS

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August 11, 1999

Ms. Beverly Rhea, Review Coordinator
Atlanta regional Commission
200 Northcreek, Suite 300
3715 Northside Parkway
Atlanta, Georgia 30327-2809

BY HAND DELIVERY

Re: Touchet Industrial Development
City of Douglasville

Dear Ms. Rhea:

I am writing in opposition to the rock quarry, concrete plant and asphalt plant proposed by Mr. Touchet in Douglas County. I am opposed to this project for several reasons. First, as a Douglas County Commissioner, the majority of the city and county residents at our recent public hearing were overwhelmingly against this development. Although Mr. Touchet assured the citizens that this project would not be detrimental to the neighborhood, I know first hand that this is not so. Adjoining my property in the east end of Douglas County is an existing rock quarry. The negative effects of a quarry operation on the neighboring property owners are substantial. Our neighborhood has ongoing problems with blasting, dust and truck traffic. Houses in our community have sustained structural damage due to the blasting at the existing quarry. To put another blasting operation in such close proximity does not make sense. The area of the proposed operations is essentially a residential community and will experience the same problems.

Additionally, the ongoing air quality problems experienced in the metro Atlanta area can only be aggravated by this new operation. The dust and odor problems of such an operation are significant. These problems associated with quarry operations have led to demonstrated decrease in residential property values in my neighborhood surrounding the existing quarry. As real estate agent for many years, I am certain that the property owners surrounding the proposed site would experience a decrease in property value. Buyers are very reluctant to purchase residential property near a quarry operation. The prospect of area surrounding the quarry being rezoned commercial or manufacturing is slim. The future land use map shows this area remaining residential.

The location of these quarry and plant operations will also necessitate additional truck traffic over rail crossings. The traffic crossing the railroad is already a significant safety hazard as demonstrated by the City of Douglasville proposed safety project to build an overpass. In his DRI application, Mr. Touchet states "[a]n additional railroad crossing has been approved and will be constructed." However, at the public hearing Mr. Touchet admitted that approvals have not been given to build the new crossing. In fact, the existing crossing that must be closed to accommodate a new crossing has not even been identified. Keith Williams, City of Douglasville Engineer, has stated the necessary approvals for the new railroad crossing have not been given.

For all these reasons, I oppose Mr. Touchet's development. Thank you for your consideration of this information.

Sincerely,

A handwritten signature in cursive script, appearing to read "Johnny Groover".

Johnny Groover
Commissioner, District I

Cc: BOC
Bill Osborne, City Manager
Charles Camp, Mayor