

NWGRC

NORTHWEST GEORGIA REGIONAL COMMISSION

A Region With A Bright Future



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MEMORANDUM

To: Local Governments, State Agencies, and Affected Parties

From: Lloyd Frasier, Executive Director

A handwritten signature in blue ink, appearing to read 'Lloyd Frasier', written over a faint circular stamp that says 'CERTIFIED COPY'.

Date: November 29, 2021

Subject: Report and Recommendations on DRI 3478 Vindicator Environmental and Industrial Park, Haralson County

The Northwest Georgia Regional Commission has conducted the Development of Regional Impact review and prepared this report. In making local planning decisions, Haralson County is encouraged to review the comments presented here. The proposed project would construct a new MSW waste disposal landfill on 2,047 acres between Tallapoosa and Bremen on Highway 100 at I-20, with an industrial component for light manufacturing, warehousing and other light industrial facilities.

GDOT District 6 comments that a permit from GDOT will be required for any driveway off of SR 100 or SR 78. GDOT requirements can be found in the GDOT Driveway Manual:

<http://www.dot.ga.gov/PartnerSmart/DesignManuals/Encroachment/Driveway.pdf>

Georgia DNR Floodplain Unit comments, "From inspection of the effective Flood Insurance Rate Map (FIRM) panels developed by the Federal Emergency Management Agency (FEMA), the site is located outside of the Special Flood Hazard Area (SFHA), in Zone X, an area of low flood risk. A Floodplain Snapshot Map showing the designated floodplain impacts in the vicinity of the project location is attached." Please see the Floodplain Snapshot and full comments.

GDOT Aviation comments that, "This proposed new MSW waste disposal landfill is 6.1 miles from West Georgia Regional Airport-O V Gray Field (CTJ). This is not an Air-21 airport requiring 6 miles from landfill to airport separation. This location meets the recommended 5 mile separation proposed in AC No: 150/5200-33C - Hazardous Wildlife Attractants on or near Airports. If any construction equipment or construction exceeds 200' above ground level, an FAA Form 7460-1 must be submitted to the Federal Aviation Administration. Those submissions for any associated buildings or cranes taller than 200' may be done online at <https://oeaaa.faa.gov...>" Please see full comments.

USDA NRCS comments that if Federal funds are involved, a farmland conversion assessment may be prepared; no NRCS dams or easements are in the project area.

Regional Planning Economic Development Area Agency on Aging Workforce Investment Program

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Local and Regional Impact Assessment, DRI 3478 Vindicator Environmental & Industrial Park

Prepared at request of Haralson County

1. Have the transportation impacts of this development been identified?
-A traffic study was prepared by Cranston Engineering in 2021: 416 trips/day anticipated in the opening year of 2025, for the anticipated 41 landfill trucks/day and 100 employees of the industrial park. In the Design Year (2040), this would increase to 1,917 trips/day; the study states that at this point “all publicly controlled intersections will continue to operate within the allowable delay and capacity.” The study states that traffic turning left from the park onto Highway 100 (south) to access I-20 will experience significant delays and recommends additional storage for these vehicles on the internal road. Study states that the additional traffic using the I-20 interchange will require GDOT to update signalization at the interchange. Potential for impact to one county road, Budapest Road, during construction. Some traffic may use US Highway 78 to connect to SR 100.
2. Does the existing transportation network, as well as the funded portion of the applicable transportation plan (STIP/ TIP/ LRTP) mitigate identified project impacts?
-The 2021 Cranston traffic study states that the additional traffic using the I-20 interchange will require GDOT to update signalization at the interchange. No projects are programmed in the State Transportation Improvement Program for FY21-24 for SR 100 in Polk, Haralson Counties.
3. Will developer-funded mitigation of the transportation impacts of this development be enhancements and/or improvements of the items in the applicable transportation plan?
-A right turn deceleration lane from Hwy 100 will be constructed in the opening year (2025). An additional traffic study will be conducted 10 years after the site opens, to determine if additional improvements are warranted. GDOT District 6 comments that a permit from GDOT will be required for any driveway off of SR 100 or SR 78.
4. Does the development avoid or mitigate impacts on public facilities (roads, stormwater/ floodplain management, water quality, etc.) in neighboring jurisdictions?
-Most traffic impact is anticipated along GA Highway 100, some portion of which may travel through Tallapoosa; most traffic is anticipated to travel via I-20 and GA Highway 100.
5. Are neighboring jurisdictions aware of, and prepared to manage, impacts of the development on public facilities (roads, stormwater/ floodplain management, water quality, etc.) in their jurisdictions?
-No comments received from neighboring jurisdictions.
6. Is this project consistent with any applicable regional transportation plans?
-No projects programmed in the State Transportation Improvement Program for FY21-24 for SR 100 in Polk, Haralson Counties. No applicable regional transportation plan.
7. Do adequate wastewater/sewerage facilities currently exist to support the development?
-Wastewater treatment to be provided by developer via access to existing public sewer for industrial park and/or via onsite septic management for landfill, with peak demand anticipated of 0.316 MGD for park and 0.000375 MGD for landfill. Tallapoosa, by agreement with Haralson County, may be the provider of sewer service in this area. Leachate will be drained from the

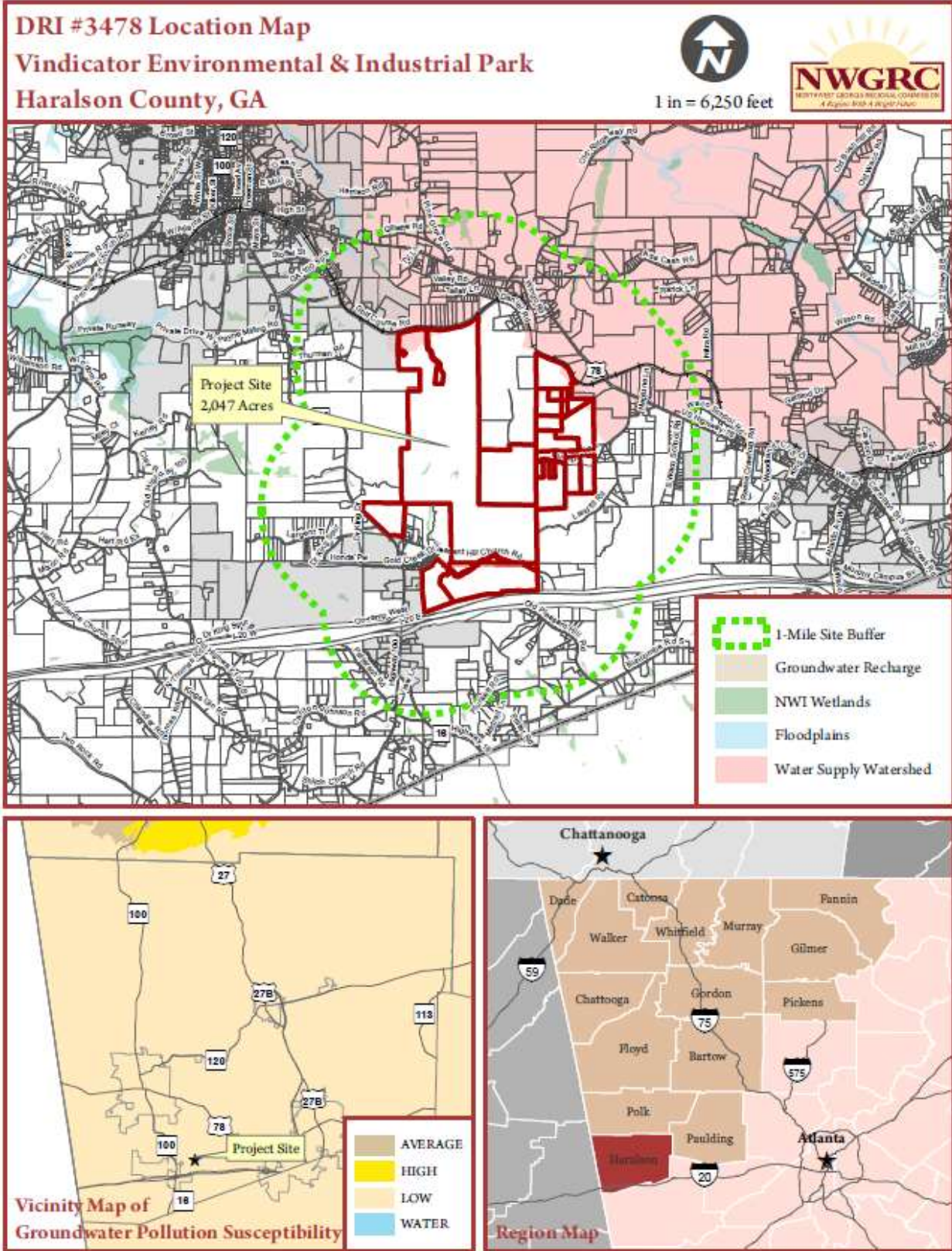
landfill and stored in wells, then transported offsite for treatment by public wastewater treatment facilities.

8. Do adequate water supply and treatment facilities currently exist to support the development?
-Water to be provided by developer via access to existing public water supply for industrial park and/or via private well for landfill, with peak demand anticipated of 0.25575 MGD. Haralson County Water Authority and/or Tallapoosa may provide water service in this area.
9. Do adequate stormwater facilities currently exist to support the development?
-Development plans submitted include stormwater retention/ sediment collection ponds and buffers.
10. Do adequate solid waste facilities currently exist to support the development?
-N/A
11. Is the local government fiscally capable of adequately providing any new facilities/services anticipated/likely to be required by the development?
-Haralson County Water Authority and/or Tallapoosa may provide water and/or wastewater service to this area.
12. Are potential impacts on water supply watersheds adequately addressed in the proposal?
-There is a water supply watershed for the Tallapoosa River to the north of site; the watershed includes a small portion of Tract H, at the northwest corner of site.
13. Are potential impacts on wetlands adequately addressed in the proposal?
-Streams and wetlands are identified on site; US Army Corps of Engineers requirements will apply.
14. Are potential impacts on groundwater recharge areas adequately addressed in the proposal? -
-No impacts identified.
15. Are potential impacts on floodplains adequately addressed in the proposal?
-Georgia DNR Floodplains Unit comments, "...the site is located outside of the Special Flood Hazard Area (SFHA), in Zone X, an area of low flood risk." Please see full comments.
16. Are potential impacts on historic resources adequately addressed in the proposal?
-No impacts identified.
17. Are any actions needed to mitigate or manage potential adverse impacts of this development?
-Development plans submitted include stormwater retention/ sediment collection ponds and buffers, and right turn entrance lane on Georgia Highway 100, as well as a potential future traffic study to reevaluate impacts after 10 years' operation.
18. Is the development consistent with the Regional Development Map and Defining Narrative?
-This area is shown as Rural in the Northwest Georgia Projected 2040 Regional Land Use map, meaning that infrastructure, particularly sewer, is not anticipated to be extended to this area to support greater development density. The GA Highway 100 exit interchange on I-20 is shown as developing or developed.
19. Is the development consistent with the Guiding Principles or applicable Policies narrative of the Regional Plan?
-Some of the applicable policies include GP 1.4, "We will take into account impacts on infrastructure and natural resources in our decision making on economic development projects;" "GP3.1 We will encourage new development to locate in suitable locations to protect scenic and natural resources, environmentally sensitive areas, or significant historic or

archaeological resources from encroachment;” “GP4.3 We will promote enhanced solid waste reduction and recycling initiatives;” “GP5.1 We will seek opportunities to share services and facilities with neighboring jurisdictions when mutually beneficial, (p. 21-22).”

20. If within one mile of any area on the RIR map, is the development consistent with the Guidance for Appropriate Development Practices in the Regional Resource Plan?
-A water supply watershed and wetlands are identified within one mile of the site. The 2012 Regional Resource Plan identifies the following Appropriate Development Practices: “Comply with all federal, state, and local legislation for the protection of State Vital Areas; Retain existing vegetation and topography wherever possible; Locate all construction as far as possible from water resources, including flood prone areas and wetlands; Use natural features for storm water control whenever possible; Exceed minimum required buffers wherever possible; Minimize the amount of impervious surface by using alternative materials and designs; Install rain gardens, vegetated swales, or other water filtration design mechanisms to improve the quality of stormwater runoff (p. 20-21).”
21. Are adjacent land uses outside the host jurisdiction compatible to the proposed development’s land use?
-Surrounding land uses in the City of Tallapoosa include commercial, industrial, and mixed use at the I-20 Interchange.
22. Is the development consistent with the host government’s Future Development Map/ Future Land Use Map and comprehensive plan?
-The 2017 Joint Comprehensive Plan shows this area of Haralson County as Agricultural/ Forest, with suburban residential along Georgia Highway 100 and Highway 78 corridors.
23. Is the development consistent with any adjacent or potentially affected local government’s Future Development Map?
-The 2017 Joint Comprehensive Plan shows Industrial and Scenic Byway to the north, and shows the I-20 interchange area of Tallapoosa as Industrial, Mixed use, and Commercial.
24. Is the development consistent with the CEDS?
-The 2017 Comprehensive Economic Development Strategy includes the Essential Infrastructure Goal of “Industrial Properties: Ensure northwest Georgia has sufficient, ready to develop industrial properties available to meet the region’s current and future needs (p. 24).”

MAP



COMMENTS RECEIVED

Julianne Meadows

From: Barry, Christina <cbarry@dot.ga.gov>
Sent: Friday, October 1, 2021 12:58 PM
To: Julianne Meadows
Subject: RE: Request for Comments on DRI 3478, Vindicator Environmental & Industrial Park, Haralson County

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good Afternoon Julianne,

The provided pdf is a little grainy, so it's difficult to tell what exactly is being proposed. However, please let the applicant know that they will require a permit from GDOT for any driveway off or SR 100 or US 78. Our requirements can be found in our Driveway manual here: <http://www.dot.ga.gov/PartnerSmart/DesignManuals/Encroachment/Driveway.pdf>

Please let me know if you need anything else from me.

Thanks!

Christina Barry, PE
District Traffic Engineer



District 6
30 Great Valley Parkway
White, GA 30184
Office: (678) 721-5240
Cell: (470) 423-2964

From: Julianne Meadows <jmeadows@nwgrc.org>
Sent: Friday, October 1, 2021 12:38 PM
To: Alison.palmer@haralsoncountyga.gov; bharvell@buchananga.com; phicks@bremenga.gov; pclarey@tallapoosaga.gov; wacosam@bellsouth.net; celliott@polkga.org; Ann.lippman@paulding.gov; bskipper@carrollcountyga.gov; Lloyd Frasier <lfrasier@nwgrc.org>; Barbara Snead <bsnead@nwgrc.org>; Ethan Calhoun <ecalhoun@nwgrc.org>; Joseph Davidson <jdavidson@nwgrc.org>; Julianne Meadows <jmeadows@nwgrc.org>; Jon.West@dca.ga.gov; zane.grennell@dca.ga.gov; patrick.vickers <patrick.vickers@dca.ga.gov>; Barry, Christina <cbarry@dot.ga.gov>; Ciavarro, Joseph <jciavarro@dot.ga.gov>; AviationPrograms <aviationprograms@dot.ga.gov>; Hood, Alan C. <achood@dot.ga.gov>; acarroll@gefa.ga.gov; conserve@mctga.org; gigi.steele@dnr.ga.gov; haydn.blaize@dnr.ga.gov; Dan.Wallace@ga.usda.gov; jesse@coosa.org; kowens@tnc.org; anakela.escobar@dnr.ga.gov; lori.corley@earpdc.org; tyler.ferrell@earpdc.org
Subject: Request for Comments on DRI 3478, Vindicator Environmental & Industrial Park, Haralson County

Good afternoon,



Richard E. Dunn, Director

Watershed Protection Branch
Nonpoint Source Program
Floodplain Unit
2 Martin Luther King, Jr. Drive
Suite 1152, East Tower
Atlanta, Georgia 30334

FLOODPLAIN ENCROACHMENT REVIEW

To: Julianne Meadows

Email: jmeadows@nwgrc.org

PROJECT NAME:	DRI 3478, Vindicator Environmental & Industrial Park	COUNTY:	Haralson	COMMUNITY:	Haralson County, City of Tallapoosa
LOCATION:	Please see the project location map provided by the applicant.				
BRIEF PROJECT DESCRIPTION:	The proposed project would construct a new MSW waste disposal landfill on 2,047 acres between Tallapoosa and Bremen on Highway 100 at I-20, with an industrial component for light manufacturing, warehousing, and other light industrial facilities.				
APPLICANT:	Northwest Georgia Regional Commission	APPLICATION DATED:	10/01/2021	APPLICATION RECEIVED:	10/01/2021

SFHA* ENCROACHMENT:	No	EFFECTIVE PANEL(S):	13143C0225B, 13143C0210B, 13143C0250B (Effective Date: 09/26/2008)	FLOOD RISK ZONE(S):	X
www.georgiadfirm.com		PRELIMINARY PANEL(S):	N/A	FLOOD RISK ZONE(S):	N/A
https://msc.fema.gov/portal		LETTER OF MAP CHANGE (S):	N/A	FLOOD RISK ZONE(S):	N/A
WATERSHED(S):	Upper Tallapoosa (8 Digit HUC: 03150108)	COMMUNITY CONTACT:	<p><u>City Manager (City of Tallapoosa)</u> Address: 25 East Alabama Street Tallapoosa, Georgia 30176 Tel: (770) 574-2345</p> <p><u>Director City Emerg. Mgmt. (Haralson)</u> Address: P.O. Box 488 Buchanan, Georgia 30113 Tel: (770) 646-2036</p>		
COMMENTS:	<p>From inspection of the effective Flood Insurance Rate Map (FIRM) panels developed by the Federal Emergency Management Agency (FEMA), the site is located outside of the Special Flood Hazard Area (SFHA), in Zone X, an area of low flood risk. A Floodplain Snapshot Map showing the designated floodplain impacts in the vicinity of the project location is attached.</p> <p>Please note that this response addresses issues related specifically to the possible effects of the project on floodplains in the area, it does not override or supersede any State or local procedural substantive provisions which may apply to floodplain management requirements associated with amendments to State or local floodplain zoning ordinances, maps, or State or local procedures adopted under the National Flood Insurance Program.</p>				
Prepared By:	Chris Costley	Telephone:	(470) 607-2779	Email:	Christopher.Costley@dnr.ga.gov



FEMA FIRM Extract



Project Location Map

DRI 3478 COMMENT FORM

Description of DRI project:

The Northwest Georgia Regional Commission is requesting comments on DRI 3478, Vindicator Environmental & Industrial Park, Haralson County, Georgia. The proposed project would construct a new MSW waste disposal landfill on 2,047 acres between Tallapoosa and Bremen on Highway 100 at I-20, with an industrial component for light manufacturing, warehousing and other light industrial facilities. Please send comments to Julianne Meadows, jmeadows@nwgrc.org, within the following 15-day period: October 1, 2021- October 15, 2021.

Comments**Name: Alan Hood****Date: 10/15/2021****Organization: GDOT Aviation**

Comments: This proposed new MSW waste disposal landfill is 6.1 miles from West Georgia Regional Airport-O V Gray Field (CTJ). This is not an Air-21 airport requiring 6 miles from landfill to airport separation. This location meets the recommended 5 mile separation proposed in AC No: 150/5200-33C - Hazardous Wildlife Attractants on or near Airports.

If any construction equipment or construction exceeds 200' above ground level, an FAA Form 7460-1 must be submitted to the Federal Aviation Administration. Those submissions for any associated buildings or cranes taller than 200' 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.

Reviewing Regional Commission: Northwest Georgia**Contact Person: Julianne Meadows****Address: P. O. Box 1798, Rome, Georgia 30162-1798****Phone: (706) 295-6485 Fax: (706) 295-6665****E-mail: jmeadows@nwgrc.org**



United States Department of Agriculture

November 17, 2021

Julianne Meadows
Northwest Georgia Regional Commission
PO Box 1798/ 1 Jackson Hill Drive
Rome, GA 30162

Re: DRI 3478, Vindicator Industrial Park & Landfill, Haralson County

Dear Ms. Meadows:

This letter is in reference to your request for information on the possible impacts the proposed industrial park and landfill construction project may have on land use, conservation, water quality and other general environmental concerns that may be of interest to our agency. The following outlines our concerns with the proposed project with regards to farmland protection, and Natural Resources Conservation Service (NRCS) watershed dams and project easements.

Farmland Protection

The Farmland Protection Policy Act (FPPA) is intended to minimize the impact federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses. Projects are subject to FPPA requirements if they may irreversibly convert farmland (directly or indirectly) to nonagricultural use and are completed by a federal agency or with assistance from a federal agency. For the purpose of FPPA, farmland includes areas located within soil map units rated as prime farmland, unique farmland, and land of statewide or local importance. Farmland subject to FPPA requirements does not have to be currently used for cropland. It can be forest land, pastureland, cropland, or other land uses, but not water or urban built-up land. It should be noted that the FPPA does not authorize the Federal Government to regulate the use of private or nonfederal land or, in any way, affect the property rights of owners.

NRCS uses a Land Evaluation and Site Assessment (LESA) system to establish a farmland conversion impact rating score on proposed sites of federally funded and assisted projects. This score is used as an indicator for the project sponsor to consider alternative sites if the potential adverse impacts on the farmland exceed the recommended allowable level. It is our understanding that the proposed project involves federal funds or assistance, and thus could be subject to this assessment. Please note, FPPA considers indirect as well as direct conversion. The acres directly converted will be the project area. Areas planned for direct or indirect conversion should be indicated on plans or maps included in the packet of materials for the project. **This project converts farmland. Form AD-1006, Farmland Conversion Impact Rating, is used to develop and document the assessment. The AD-1006 form, and instructions for completing the form, are available at:** http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1045394.pdf. **Parts I and III need to be completed and returned to: Dee Pederson, Assistant State Soil Scientist, USDA-NRCS, 355 East Hancock Avenue, Athens, Georgia, 30601 or dee.pederson@usda.gov.**

Natural Resources Conservation Service
Georgia State Office
355 East Hancock Avenue - Athens, GA - 30601-2775
Voice: 706-546-2272 Fax: 855-417-8490

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NRCS Watershed Dams

More than 50 years ago, the U.S. Department of Agriculture was authorized by Congress to help local communities with flood control and watershed protection through the Watershed Program (PL-534 Flood Control Act of 1944 and PL-566 Watershed Protection and Flood Prevention Act). As a result, local communities, with NRCS assistance, have constructed over 11,000 dams in 47 states since 1948. These dams were originally constructed for protection of farmlands from flooding impacts. In 2000, PL-566 was amended to provide NRCS authorization to assist communities with rehabilitation of their aging dams. The legislation authorizes NRCS to work with local communities and watershed project sponsors to address public health and safety concerns and potential environmental impacts of aging dams.

We have reviewed our records and have determined that there are no such structures downstream and/or in the vicinity of the proposed project that could be affected by these activities.

NRCS Easements

NRCS easements relate to our Wetland Reserve Program and the Farm and Ranchland Protection Program. **We have reviewed our records and have determined that there are no such easements downstream or in the near vicinity of the proposed project that could be affected by these activities.**

NRCS appreciates this opportunity to comment. If you have questions or need any additional information, please contact me at dan.wallace@usda.gov.

Sincerely,

DANIEL F. WALLACE
STATE RESOURCE INVENTORY COORDINATOR

cc: Michael Watson, Assistant State Conservationist (FO), NRCS, Griffin, GA
Cindy Haygood, District Conservationist, NRCS, Carrollton, GA
Michael Henderson, Resource Soil Scientist, NRCS, Griffin, GA