

DEVELOPMENT OF REGIONAL IMPACT (DRI) REGIONAL REVIEW & REQUEST FOR COMMENTS

Three Rivers Regional Commission
P. O. Box 818 Griffin, GA 30224 Telephone: 678-692-0510 Fax: 678-692-0513

GENERAL INFORMATION

Name of Proposal:

Submitting Local Government:

RC Contact:

Telephone:

Email:

Sentury Tire Plant City of LaGrange James A. Abraham, Sr.

678-692-0510

abraham@threeriversrc.com

DRI Online ID#: 2708

Deadline for Comments: October 9, 2017

RC Info: Robert Hiett,

Interim Executive Director

Three Rivers Regional Commission

P. O. Box 818

Griffin, Georgia 30224

INSTRUCTIONS

The project described below has been submitted to the Three Rivers Regional Commission (TRRC) for review as a Development of Regional Impact (DRI). A DRI is a development project of sufficient scale or importance that it is likely to have impacts beyond the jurisdictions in which the project is actually located, such as adjoining cities or neighboring counties.

The Three Rivers Regional Commission (TRRC) would like to consider your review and comments on this proposed development in our DRI review process from all potentially Affected Government Parties. For the purposes of this review, "Affected Government Parties" are defined as: 1) any local government within geographic proximity that may be impacted by the DRI project located outside of its jurisdictional limits; 2) any local, state, or federal agencies that could potentially have concern about the project's impact on regional systems and resources; 3) Georgia Regional Transportation Authority (GRTA), if the proposed project is located within GRTA's jurisdiction; and 4) the host Regional Commission plus any Regional Commission within geographic proximity that could potentially have concern about the project's impact on regional systems and resources.

Therefore, please review the information about the project included with this form and gives us your comments on the attached sheet as provided. Please contact the staff member identified in this package for any questions or comments. The completed form must be returned to the TRRC on or before the specified return deadline.

PROJECT DESCRIPTION

Sentury Tire, is based in Qingdao, China. The company is locating its American Headquarters, research, development, distribution and manufacturing plant to the City of LaGrange in Troup County, Georgia.. The plant will be developed on \pm 400 acres off Pegasus Parkway at Sewon Boulevard. The first phase of the project will be an estimated \$530 million investment and employ 1,000 people (see the attached staff preliminary report for more details).

PRELIMINARY FINDINGS AND COMMENTS OF THE TRRC AND GRTA (If applicable)

The Atlanta Regional Commission (ARC) administer, under contract, the Georgia Regional Transportation Authority's (GRTA's) functions pursuant to state law (OCGA §50-32-14). However, Troup County and the city of LaGrange are outside of GRTA's jurisdiction, so GRTA review does not apply to this review. This development would not fall under that agency's purview. Therefore, a review by that agency is not required. However, this DRI does have to undergo GDOT (Georgia Department of Transportation) review and comments because of the State route in the proposed development.



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Name of Project: Sentury Tire Plant

DRI Online ID#: 2708

The following Local Governments and Agencies are receiving Notice of this Request for Comments on this TRRC DRI review:

City of Grantville City of Hogansville Town of Lone Oak

Coweta County Government Troup County Government

Heard County Government

Meriwether County Government

Troup County School System (TCSS)

LaGrange—Troup County Chamber of Commerce

River Valley Regional Commission

Georgia Department of Economic Development

Coweta County Development Authority
City of LaGrange Industrial Authority

Meriwether County Chamber of Commerce

Three Rivers Regional Commission Transit

Georgia Department of Natural Resources (DNR) Georgia Department of Transportation (GDOT)

Georgia Department of Community Affairs (DCA)

City of West Point

City of West Point Development Authority

Harris County Government

City of Franklin

LaGrange –Callaway Airport

Chambers County, State of Alabama Troup County Development Authority Meriwether Development Authority Heard County Chamber of Commerce

EPD Air Protection Branch

EPD Watershed Protection Branch EPD Land Protection Branch

Georgia Department of Transportation (GDOT) Aviation Program



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Name of Project: Sentury Tire Pant	DRI Online ID #: 2708
Comments from affected party (attach additional sheets as needed):	
AFFECTED PARTY AND LOCAL GOVERNMENTS IN	FORMATION
Name of Local Government or Affected Party: Department Location:	Please Return This Form To: James A. Abraham, Sr., Planner Three Rivers Regional Commission P. O. Box 818
Telephone:	Griffin, GA 30224 Telephone: 678-692-0510 Fax: 678-692-0513 jabraham@threeriversrc.com
5,0,.55.5.	Return Date: October 9, 2017





Developments of Regional Impact

DIM HOME	Het map	APPLY YE	ew Submissions	Logout
DRI #2708				
DE		NT OF REGION		
This form is to be completed by the city or c f the project appears to meet or exceed ap and Thresholds for more information.				
	Local Go	vernment Info	rmation	
Submitting Local Governme	nt: LaGrange			
Individual completing for				
· = -				
Telephor	1e: 70688320	88		
E-ma	ail: Ithreadgill(@lagrangega.org		
a project is to be located in more than one j jovernment in which the largest portion of t	he project is to		nsible for initiating the DR	
Name of Proposed Proje	ct: Sentury Ti	ire Plant		
Location (Street Address, GPS Coordinate or Legal Land Lot Descriptio	s, 32.979432,		VVV.	
Brief Description of Proje	headquarte ct: center on a The first pl	ers, research and de 400 acres off Pegasu	o, Shandong, China, will le evelopment, distribution s Parkway at Sewon Boul will be an estimated \$53	and manufacturing evard in LaGrange.
Development Type:				
O(not selected)	Hotels		Wastewater Treatme	nt Facilities
Office	Mixed Use		Petroleum Storage F	acilities
Commercial	Airports		OWater Supply Intakes	/Reservoirs
Wholesale & Distribution	Attractions & R	ecreational Facilities	s Ointermodal Terminals	i
OHospitals and Health Care Facilities	Post-Secondar	y Schools	Truck Stops	
Housing	Waste Handlin	g Facilities	OAny other developme	ent types
Industrial	Quarries, Asph	alt & Cement Plants		
If other development type, describe:				
Desired Sing (H of the line Books)	v (4 co.e.			
Project Size (# of units, floor area, etc				
Develop	er: Sentury Ti	ire LLC.		
Mailing Addres	ss: 309 Churc	ch Street		
Address	2:			
	City: Lagrar	nge	State: GA	Zip: 30240
Telephor	ne: 70688104	45	7	
Ema				
Is property owner different fro developer/applicar	om O/teele	cted) Yes No		
If yes, property own		Foundation		
Is the proposed project entirely located with	nin (not sele	ected) • Yes No		
your local government's jurisdictio				

If no, in what additional jurisdictions is the project located?	
Is the current proposal a continuation or expansion of a previous DRI?	
If yes, provide the following information:	Project Name: Project ID:
The initial action being requested of the local government for this project:	
ls this project a phase or part of a larger overall project?	
If yes, what percent of the overall project does this project/phase represent?	
Estimated Project Completion Dates:	This project/phase: October 2019 Overall project: October 2019
Save Updates to Submitted Form	Save without Submitting Cancel
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Developments of Regional Impact

Logout

DRI Home	Tier Map	Apply	View Submissions
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ORI #2708		
JKI #2708		
	PMENT OF REGIONAL IMPACT	
	ounty government to provide information needed by the RDC for its review s for the DRI Process and the DRI Tiers and Thresholds for more	
Loc	al Government Information	
Submitting Local Government:	LaGrange	
Individual completing form:		1
	7068832088	1
·	lthreadgill@lagrangega.org	
		,
	Project Information	
Name of Proposed Project:		
DRI ID Number:		1
	Sentury Tire LLC., Alexandra Segers	l
	7068810445 asegers@ssoe.com	
Linai(s).	aseyers@ssue.com	
Addit	ional Information Requested	
Has the RDC Identified any additional information required in order to proceed with the official regional review process? (If no, proceed to Economic Impacts.)	○(not selected)○Yes® No	
yes, has that additional information been provided to your RDC and, if applicable, GRTA?	• (not selected) Yes No	
no, the official review process can not star	t until this additional information is provided.	540
ı	Economic Development	i
stimated Value at Build-Out:	430 Million USD	
stimated annual local tax revenues (i.e., roperty tax, sales tax) likely to be enerated by the proposed development:	7.5 Million USD	
the regional work force sufficient to fill the demand created by the proposed roject?	(not selected) • Yes No	
fill this development displace any xisting uses?	(not selected) Yes ® No	
yes, please describe (including number o ,700,000 square feet of building	f units, square feet, etc):	
	Water Supply	
Name of water supply provider for this site:	City of LaGrange	
What is the estimated water supply		
lemand to be generated by the project.	435.7 MGD	

measured in Millions of Gallons Per Day (MGD)?	
s sufficient water supply capacity available to serve the proposed project?	(not selected) • Yes No
no, describe any plans to expand the exis	sting water supply capacity:
s a water line extension required to serve nis project?	(not selected) Yes No
ff yes, how much additional line (in miles) v	will be required?
lama of westernator transfer and are idea for a	Wastewater Disposal
Name of wastewater treatment provider for his site:	City of LaGrange
What is the estimated sewage flow to be penerated by the project, measured in Millions of Gallons Per Day (MGD)?	422.629 MGD
s sufficient wastewater treatment capacity allable to serve this proposed project?	(not selected) Yes No
no, describe any plans to expand existing	wastewater treatment capacity:
¥	
s a sewer line extension required to serve	○(not selected) Yes ® No
f yes, how much additional line (in miles) w	vill be required?
	Land Transportation
low much traffic volume is expected to be	
enerated by the proposed development, n peak hour vehicle trips per day? (If only in alternative measure of volume is vailable, please provide.)	4-5 trucks per hour, during day time operation
Has a traffic study been performed to letermine whether or not transportation or access improvements will be needed to serve this project?	୍(not selected) Yes [®] No
Are transportation improvements needed to serve this project?	(not selected) Yes® No
yes, please describe below:	
	Solid Waste Disposal
now much solid waste is the project expected to generate annually (in tons)?	750 tons/year
s sufficient landfill capacity available to serve this proposed project?	(not selected) ● Yes No
no, describe any plans to expand existing	landfill capacity:
Vill any hazardous waste be generated by ne development?	○(not selected) ○Yes ® No
yes, please explain:	
	- At
5	Stormwater Management
What percentage of the site is projected to be impervious surface once the proposed	33%
development has been constructed?	

DRI Additional Information Form

	Environmental Quality	
Is the development located within, or like	ly to affect any of the following:	
1. Water supply watersheds?	○(not selected) ○Yes • No	
2. Significant groundwater recharge areas?	(not selected) Yes No	
3. Wetlands?	○(not selected) ○Yes®No	
4. Protected mountains?	○(not selected) ○Yes®No	
5. Protected river corridors?	(not selected) Yes No	
6. Floodplains?	○(not selected) ○Yes®No	
7. Historic resources?	○(not selected) ○Yes®No	
8. Other environmentally sensitive resources?	○(not selected) ○Yes No	
If you answered yes to any question abou		

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DRI (DEVELOPMENT OF REGIONAL IMPACT) REGIONAL REVIEW

STAFF PRELIMINARY REPORT DRI # 2708 SENTURY TIRE PLANT, CITY OF LAGRANGE, GEORGIA

Prepared for

Mayor and City Council City of LaGrange 200 Ridley Avenue LaGrange, Georgia 30240 www.lagrange-ga.org

Reviewed and Prepared by

James A. Abraham, Sr.
Three Rivers Regional Commission
120 North Hill Street
P.O. Box 818
Griffin, Georgia 30224
www.threeriversrc.org

September 22, 2017

BACKGROUND

Based on Staff's research, Sentury Tire is a Chinese manufacturer of tires for cars and aviation. The company was ranked in 2015 as the 50th largest tire maker in the world by sales according to the trade publication Tire Business. The company's original main manufacturing site is located in its hometown of Qingdao, near the Qingdao Liuting International Airport. According to the company, the factory opened in 2009 and is one of the most automated tire factories in the world. Its other manufacturing facility is in Thailand where it opened a factory in 2015 with a capacity to produce 12 million units per year. The Chinese tire manufacturer entered a multimillion deal with the State of Georgia to move to the City of LaGrange, Georgia initially adding 1,000 jobs to the region. Mr. Rami Helminen, an executive formerly with Nokian Tyres will be overseeing the project.

Sentury's main products are passenger car tires. However, in 2013 the company became a new entrant in aviation tires, a specialized industry dominated by an oligopoly. The company product line in aviation includes the main landing gear tire for the Boeing 737-700/800/900 aircraft certified under Federal Aviation Administration technical standard TSOC62e-2006.

Sentury Tire has been considered a global advanced-technology tire manufacturer company of automotive and aircraft tires serving over 150 markets around the world. The company selected the City of LaGrange in the State of Georgia for the location of its new ±1.6 million-square-foot tire manufacturing facility. The SSOE Group, a global project delivery firm specializing in architecture, engineering, and construction management, is selected to design the LaGrange plant. Sentury Tire North America LLC is the U.S. based subsidiary of Sentury Tire.

The new ±\$530 million tire manufacturing facility in the City of LaGrange will serve as the North American Headquarters and will be located on ±436-acres about ±70 miles southwest of the City of Atlanta in the City of LaGrange Callaway South Industrial Park. The development is estimated to generate ±1,000 jobs in the State of Georgia and the Region. According to the developers, the plant is expected to be in full operation in August 2019. Production capacity at the plant is estimated to be up to 12 million units per year over a 3-4 years' period. The LaGrange plant will feature advanced 4.0 smart technology manufacturing, test track and proving grounds, research, and development, as well as warehouse and distribution operations. The plant will have an automatic storage and retrieval system for ±2 million tires.

According to the developer, the site is large enough to facilitate a second plant in the future (see site layout attached). The long-term development plan for the site takes into consideration an optional phase 2 expansion. Phase 1 will be operating 345 days per year 24 hours per day manufacturing up to 380 sizes of car and light truck tires from 14" to 24" in multiple different trademarks having over 1,600 stock keeping units.

The main raw materials are natural rubber, synthetic rubber, carbon black, chemicals, oils, and steel and textile cords. The annual inbound material volume is 150 million kg on a steady pace.

The materials are shipped to Savannah, then to an inland port, and from there they are trucked to the plant. The plant will have rail spur to serve part of the inbound material logistics by rail. In approximately 2-3 years from start-up, all the raw materials except natural rubber will be sourced locally from different U.S. suppliers once the plant organization can do the material supplier acceptances. The natural rubber will ship from Thailand in the long term. The total material consumption per year is equivalent to about 7,500 truckloads, an average of 22 trucks per day for each operational day once the plant is at full capacity.

The LaGrange plant will serve the U.S. and Canadian tire aftermarket. The company's main customers are national and regional wholesalers, tire distributors, and tire dealers. All deliveries will leave the plant on a truck directly to the final address or an intermodal facility. The outbound tire shipments require 16,700 truckloads per year; that is an average of 45 trucks per day once the plant is at full capacity. According to the developers for cost-effectiveness, only full trucks will be shipped out.

Both the inbound and outbound logistics will spread over the period from 6 AM to 10 PM. The estimated inbound traffic is ± 1.4 trucks per hour, and outbound traffic is ± 2.8 trucks per hour.

The chart below depicts the total personnel at built.

	2019	2020	2021	2022	2023
	White Col Blue Col				
Wages	181	292	519	519	519
Production	123	202	373	373	373
Production services	30	50	74	74	74
Mixing	28	40	72	72	72
Production Ovhds	45	53	65	65	65
Production	17	17	19	19	19
Production services	19	24	27	27	27
Mixing	7	8	15	15	15
Purchasing	2	4	4	4	4
Marketing	26 8	39 22	56 40	56 40	56 40
Sales & marketing	20	31	45	45	45
Logistics & warehousing	6 8	8 22	11 40	11 40	11 40
A&G	14	16	22	22	22
Admin & finance	10	12	16	16	16
HR	4	4	6	6	6
R&D	8	19	39 0	76	100
Personnel Total	93 189	127 314	182 559	219 559	243 559
No. Color	282	*			111

The above personnel plan does not include personnel from online business customer service that could be ±200 employees. According to the developer, the customer service team will be working, for the most part, remotely and from several locations away from the plant area.

The production work will be in four (4) teams each consisting of ±130 employees in a 12-hour shift rotation with shift changes from 6:00 AM and 6:00 PM. The operation will generate estimated traffic volumes for about ±130 employee vehicles entering and ±130 employee vehicles exiting.

The remainder of the staff would be ±283 employees who will work mainly during the daytime with flexible hours and Staff note that is the potential to add an additional ±283 vehicles entering and exiting the facility.

REGIONAL COMMISSION AUTHORITY

The Georgia Planning Act authorizes the Department of Community Affairs to establish the specific thresholds, rules, and procedures for the identification of and communication about Developments of Regional Impact (DRI) that are provided in these rules. These rules apply to all local governments and Regional Commissions in the State of Georgia. The intent of the DRI rules is improved local, regional, and state level communication about new growth in the state. Communication of this nature will aid in maximizing the positive benefits of new development projects while minimizing their adverse effects. The result should improve development outcomes for the host jurisdiction, neighboring jurisdictions, the region, and the state. The DRI rules are also intended to coordinate, streamline, and provide consistency with the Georgia Regional Transportation Authority's (GRTA) required review and approval of state and federal expenditures required to create land transportation services and access to DRIs located within GRTA's jurisdictional area pursuant to O.C.G.A. 50-32-14.

This DRI (Development of Regional Impact) was triggered by a permitting application filed with the City of LaGrange by the developer Sentury Tire. The Three Rivers Regional Commission staff reviewed the information provided for the proposed development (DRI# 2708 – Sentury Tire Plant) (see attached) and has determined that in accordance with Chapter 110-12-3-.05 (a), 1. .2 that the proposed development meets or exceeds the threshold established in the rules established by the Georgia Department of Community Affairs' rules for Developments of Regional Impact.

STAFF ANALYSIS

Name of Proposal: Sentury Tire Plant

Submitting Local Government: City of LaGrange, Georgia **Initial Action Triggering the DRI:** Permitting application

Applicant Name: Sentury Tire LLC., Alexandra Segers

Applicant Engineers: The SSOE Group

Review Type: Development of Regional Impact (DRI)

Date Review Opened: September 22, 2017

Project Built out year: August 2019

Regional Context: The Three Rivers Regional Commission Regional Plan 2013-2033 (Regional Assessment) provides a framework for the region that involves all segments in developing a vision for the future. This framework helps to generate pride and enthusiasm about the future of the region, engages regional policymakers and stakeholders in implementing the plan, and provides a guide to everyday decision-making for use by government officials and other regional leaders.

The plan also serves as a technical guide to assist the Three Rivers Regional Commission in advancing Georgia's State Planning Goals which consist of the following:

- A growing and balanced economy.
- Protection of environmental, natural, cultural and historical resources.
- Provision of infrastructure and services to support efficient growth and development patterns.
- Access to adequate and affordable housing for all residents.
- Coordination of land use, planning and transportation planning to support sustainable economic development.
- Coordination of local planning efforts with local service providers and authorities, neighboring communities, and state and regional plans.

Based on Staff's research, the City of LaGrange and Troup County have experienced a few economic successes over the years. According to the LaGrange Economic Development website, they attributed the success to an engaged elected city official that help foster a positive business environment as well as a strong partnership between the City, LaGrange Economic Development Authority, and LaGrange-Troup County Chamber of Commerce.

Troup County has transitioned from a small textile community to a large industrial community in the region. Troup County has become a great place to work, live, and enjoy a good quality of life. The county now boasts of a diverse economic base including some well-known "Fortune 500" companies and is becoming one of the nation's leaders in advanced manufacturing, with leaders of national and foreign-owned multinational firms discovering the advantages of doing business in Troup County, Georgia. The county comprises of three municipalities that are the City of LaGrange, City of Hogansville, and the City of West Point.

The City of LaGrange where this DRI (Development of Regional Impact) is located is less than an hour from the world's busiest airport in Atlanta conveniently located off Interstate 85, 185, and the city is a regional hub for advanced manufacturing with a great job base. The City of LaGrange is home to a wide variety of manufacturing and service business with an abundant infrastructure to include water and sewer to support growth expansion needs in the area.

The City of LaGrange has retained and managed to control its small-town charm while having all the modern conveniences in the 21st century. The City of LaGrange Comprehensive Plan has been the City's policy document illustrating how the community will grow and develop.

The 2015–2035 Comprehensive Plan was developed in accordance with the rules established by the Georgia Department of Community Affairs (DCA) in Chapter 110-12-1 of the Standards and Procedures for Local Comprehensive Planning in the State of Georgia. The document was prepared with assistance from the Three Rivers Regional Commission planning staff and was adopted by the Mayor and City Council in October 2015.

Staff believes that this development will be a big benefit to the state, region, nation, and the local communities.

ECONOMIC DEVELOPMENT

Regional Context: The Kia Motors is one of the most successful growth stories the auto industry has seen. The brand's success is due, in large part, to its U.S. assembly plant — Kia Motors Manufacturing Georgia (KMMG) — that has produced over 1.5 million vehicles in West Point, Georgia since 2009. That state-of-the-art plant — which represents an investment of more than \$1.1 billion — is responsible for the creation of more than 14,000 jobs in West Point and the region. The Sentury Tire Plant will only compliment the Kia Motors Plant and other manufacturing industries in the region. Also, the existing Kia rail spur, from the nearby CSX line, and the Century Plant rail spur can only expand the accessibility to shipment by rail.

The Three Rivers Economic Development District (TREDD) has a strong network of historic neighboring squares and main streets to provide amenities, jobs, and luxuries that residents desire for a good quality of life. Employment centers are in all ten counties (Butts, Carroll, Coweta, Heard, Lamar, Meriwether, Pike, Spalding, Troup, and Upson). Based on the Comprehensive Economic Development Strategy (CEDS), the Sentury Tire Plant — a global advanced-technology tire manufacturer company of automotive and aircraft tires serving over 150 markets around the world — will be an added asset to the District when completed in August 2019.

The purpose of the CEDS (Comprehensive Economic Development Strategy) is to explore the economic advantages of doing business in the Three Rivers Regional Commission Economic Development District. One of the major elements is access to interstates 75, 85, 185, Hartsfield-Jackson Atlanta International Airport, proximity to Atlanta, Macon, and Columbus. Staff believes that this development will contribute to the economic viability of the region, City of LaGrange and Troup County.

The LaGrange Economic Development plays an integral role in the local and regional development. It helps city leaders support workforce development by connecting economic development efforts with workforce development and working with the business community to identify talent needs, and convening stakeholders to align disparate activities toward a common goal. The Workforce Development Programs includes Youth Programs, Career Focus Days, High School Senior Sem, HYPE, Quick Start, Troup Trained and Troup Co-works.

The Three Rivers Region is connected to thriving business and commercial centers by interstate, highways, rail, and air. The City of LaGrange is an exceptional strategic location, positioned to serve local, national and international customers and in Staff's professional opinion, Sentury Tire is a perfect fit for the region and location.

TRANSPORTATION

Regional Context: Staff wishes to note that Troup County is located near major interstate highways, a major international airport Hartsfield –Jackson Atlanta International Airport (ATL), and an extensive rail freight infrastructure — all providing convenient access to markets worldwide. There is also access to regional airports such as Birmingham International Airport (BHM), Middle Georgia Regional Airport (MCN), Columbus Metropolitan Airport (CSG), and Montgomery Regional Airport (MGM).

The Atlanta Regional Commission (ARC) administers, under contract, the Georgia Regional Transportation Authority's (GRTA's) functions pursuant to state law (OCGA §50-32-14). For clarification: The City of LaGrange is not in the GRTA (Georgia Regional Transportation Authority) jurisdiction and, as such, this DRI would not fall under that agency's purview. Therefore, a review by that agency is not required. However, this DRI does have to undergo GDOT (Georgia Department of Transportation) review and comments because of the State route in the proposed development. The project is in the City of LaGrange, east of I-85 and north of SR 16, on approximately ±339 acres (see attached preliminary site layout prepared by SSOE Group, Inc.).

The Troup County Multi-Modal Transportation Study, prepared by HNTB for the Georgia Department of Transportation, dated November 2006 has been significant to the region and the municipalities but may require updating or revisiting as the area and region grows.

Airports:

The following airports are near the plant and its International personnel.

- The Hartsfield-Jackson Atlanta International Airport is approximately 45 minutes away via Interstate 85.
- The LaGrange-Callaway Airport is a public use airport located three nautical miles southwest of the central business district of LaGrange and features one 5,600-foot runway (with a planned expansion to 6,500 feet), and an additional 5,000-foot runway.
 ILS-equipped, the airport offers full-service maintenance and storage. The City of LaGrange and Troup County owns the airport.

Staff preliminary review based on the applicant's site conceptual layout revealed that the location and height of the building might create some concerns for the LaGrange — Callaway Airport. Initial review indicates that the development and building appear to be very close to the Global Positioning System for approaches to the runway.

The approach appears to be 200 feet while the development is at ±120 feet and that may be very close (see photo below). Staff is yielding that decision to the airport and aviation authority.



Also, staff wishes to note that Form 7460 is required to be filed with the Federal Aviation Administration and staff recommends that the developer proceed to file that Form with the FAA at its earliest convenience.

Highways:

The following highways are near the plant.

- Interstates I-85 and I-185.
- Federal routes are US Hwy 29 and US Hwy 27. Hwy 27 is a four-lane corridor in west Georgia running north to Chattanooga, Tennessee and south to Tallahassee, Florida.
- State routes are Georgia Hwy 109 and Hwy 219

Rail Service:

Full-service rail facilities are provided by CSX (both East/West and North/South lines).

Bus Service:

Greyhound bus lines serve LaGrange.

Truck Lines:

- Interstate carriers total 9
- Intrastate carriers total 30
- Three local terminals serve the area.

Overnight Delivery Service:

• UPS, Federal Express, Purolator, Greyhound, Emery, and Atlanta Air Cargo provide delivery services in the area.

Seaports:

- Port of Savannah, GA 280 miles
- Port of Mobile, AL 270 miles

ENVIRONMENTAL (Water, Sewer, Wastewater, Stormwater runoff, Air Pollution, etc.)

Regional Context: Staff wishes to note that the proposed development will be partially surrounded by a Floodplain. Wetlands are a fundamental part of the natural water system. Federal law defines freshwater wetlands as those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. These areas include swamps, marshes, bogs, and similar areas in the region. Water supply watershed is one of the most vital natural resources necessary to maintain an acceptable quality of life for the residents of the Three Rivers Regional Commission Region.

Staff notes that the water supply watersheds provide drinking water, sewage treatment, electrical generation, industry and mining, recreation, and irrigation of crops. The three major watersheds in the region are Chattahoochee, Flint, and Ocmulgee. Therefore, it is imperative that the City of LaGrange protects such natural resources and incorporate into this development best management practices and methodology.

Three Rivers Regional Commission region's water resources include rivers, water supply watersheds, significant groundwater recharge areas, wetlands and stream corridors. These specific resources have been identified by the Georgia Department of Natural Resources (DNR) as the State of Georgia Vital Areas and are depicted on the Three Rivers Regional Commission's (RIR) Regionally Important Resource map. These resources are addressed in the DNR's Environmental Planning Criteria. Therefore, it is important to have guidelines in place to protect these significant resources.

Water:

The City of LaGrange is a full-service city and provides all necessary utility services including water, sewer, electricity, natural gas, telecommunications, and commercial sanitation.

Water will be supplied by the City of LaGrange through the raw water resources of the Chattahoochee River and West Point Lake Reservoir.

- Water treatment plant has a capacity = 22 million gallons per day (mgd)
- Current usage = 7 mgd, average/ 12 mgd Peak
- 6.6 million gallons finished capacity/5 million gallons of elevated storage

Wastewater sewage:

The treatment of wastewater is provided by the City of LaGrange which has an excess wastewater and sewerage capacity of 4,000,000 gallons per day.

- Wastewater treatment facility adjacent to industrial park
- Permitted flow limit = 12.5 mgd (monthly average)
- Current flows = 7 mgd/excess capacity ~4 mgd

Commercial Sanitation

The City of LaGrange provides sanitation services and manages solid waste handling for residents.

- The City's state-licensed landfill ensures a capacity sufficient for many years to come
- Industrial garbage/trash pickup is performed by the City's commercial sanitation services and individual contractors

Source: LaGrange Economic Development

Air Quality:

Staff wishes to note that pursuant the Georgia Air Quality Act, O.C.G.A Section 12-9-1, et seq, the Rules, Chapter 391-3-1, the applicant will have to apply for an Air Quality — Part 70 Operating Permit with the Georgia Department of Natural Resources, Environmental Protection Division. The applicant will have to make a Title V application and Staff recommends that the applicant contact EPD to begin the process.

The GEOS Electronic Permit Application (Georgia EPD Online System) designed to update and streamline the permitting process. This system is currently available for Title V applications.

Impervious area:

The tables below depict the impervious and pervious areas based on the developer's current master plan. The rail and test track were included within the Phase 1 Areas.

Phase 1 Area only			
	SQ FT	ACRES	
Total Site	17,473,592.88	401.14	
Pavement	2,013,820.58	46.23	
Buildings	1,658,110.78	38.06	
Green Space	13,801,661.52	316.84	
Total Impervious	3,671,931.36	84.30	
Total Pervious	13,801,661.52	316.84	
	Impervious %	21%	
	Pervious %	79%	

Phase 2 Area only			
	SQ FT	ACRES	
Total Site	17,473,592.88	401.14	
Pavement	537,501.18	12.34	
Buildings	1,486,068.48	34.12	
Green Space	15,450,023.22	354.68	
Total Impervious	2,023,569.66	46.45	
Total Pervious	15,450,023.22	354.68	
	Impervious %	12%	
	Pervious %	88%	

Phase 1 & 2 Areas			
	SQ FT	ACRES	
Total Site	17,473,592.88	401.14	
Pavement	2,551,321.76	58.57	
Buildings	3,144,179.26	72.18	
Green Space	11,778,091.86	270.39	
Total Impervious	5,695,501.02	130.75	
Total Pervious	11,778,091.86	270.39	
	Impervious %	33%	
	Pervious %	67%	

OTHER GOVERNMENTAL SERVICES IMPACT

Regional Context: Staff wishes to note that other government services such as law enforcement, emergency services, Fire, HAZMAT, EMA and other rapid local and regional response Task Force Teams, water and sewer, roads, courts, and general administration also will experience an increased demand because of the industrial nature of the development.

SCHOOL SYSTEM

<u>Regional Context</u>: Troup County School System and other neighboring school systems will not be impacted by this development because there are no "residential" components or phases to the proposed developments. Therefore, the Sentury Tire Plant will not have any negative impact or demands for educational system expansions.

Staff would note, however, that the possibility of employees relocating to the area may potentially cause increase student enrollments in local schools. However, Staff does not foresee the increased enrollments creating a demand for educational expansions or services.

LOCAL GOVERNMENTS, AGENCIES, STAKEHOLDERS AND/OR POTENTIALLY AFFECTED PARTY

Regional Context: The following Local Governments and Agencies listed below are receiving this notice of Request for Comments:

City of Grantville City of West Point

City of Hogansville Harris County Government

Town of Lone Oak City of Franklin

Coweta County Government LaGrange – Callaway Airport

Chambers County, State of Alabama
Three Rivers Regional Commission GIS
Heard County Government
Troup County Development Authority
Meriwether County Government
Troup County School System (TCSS)
Heard County Chamber of Commerce

LaGrange – Troup County Chamber of Commerce EPD Watershed Protection Branch

River Valley Regional Commission

Coweta County Development Authority

City of LaGrange Industrial Authority

Meriwether County Chamber of Commerce

EPD Air Protection Branch

Troup County School System

EPD Historic Preservation Division

EPD Land Protection Branch

Three Rivers Regional Commission Transit

Georgia Department of Transportation (GDOT), Atlanta Office

Georgia Department of Community Affairs (DCA) Georgia Department of Natural Resources (DNR)

Georgia Department of Transportation (GDOT) Aviation Program

Georgia Department of Transportation (GDOT), District 3

Three Rivers Regional Commission Workforce Development

Three Rivers Regional Commission Area Agency on Aging

City of West Point Development Authority