



Planning and Development Department Case Information

Case Number: CU23100017

Meeting Dates: Planning Commission 12-14-2023
Board of Commissioners 01-09-2024–BOC Amended Date 01-10-2024
To 01-09-2024

Applicant/Owner:
Buddy R Johnson
DAB Properties LLC
550 Mountain Trail
Monroe, Georgia 30655

Current Zoning: (I1) which is M1

Walton County Land Development Ordinance - Effective 12-3-2002, The I1 Industrial zoning district designation was rescinded. All properties located in this Land Development District shall comply with the requirements of the M1 Light Industrial District.

Request: Conditional Use to allow a solid waste transfer station

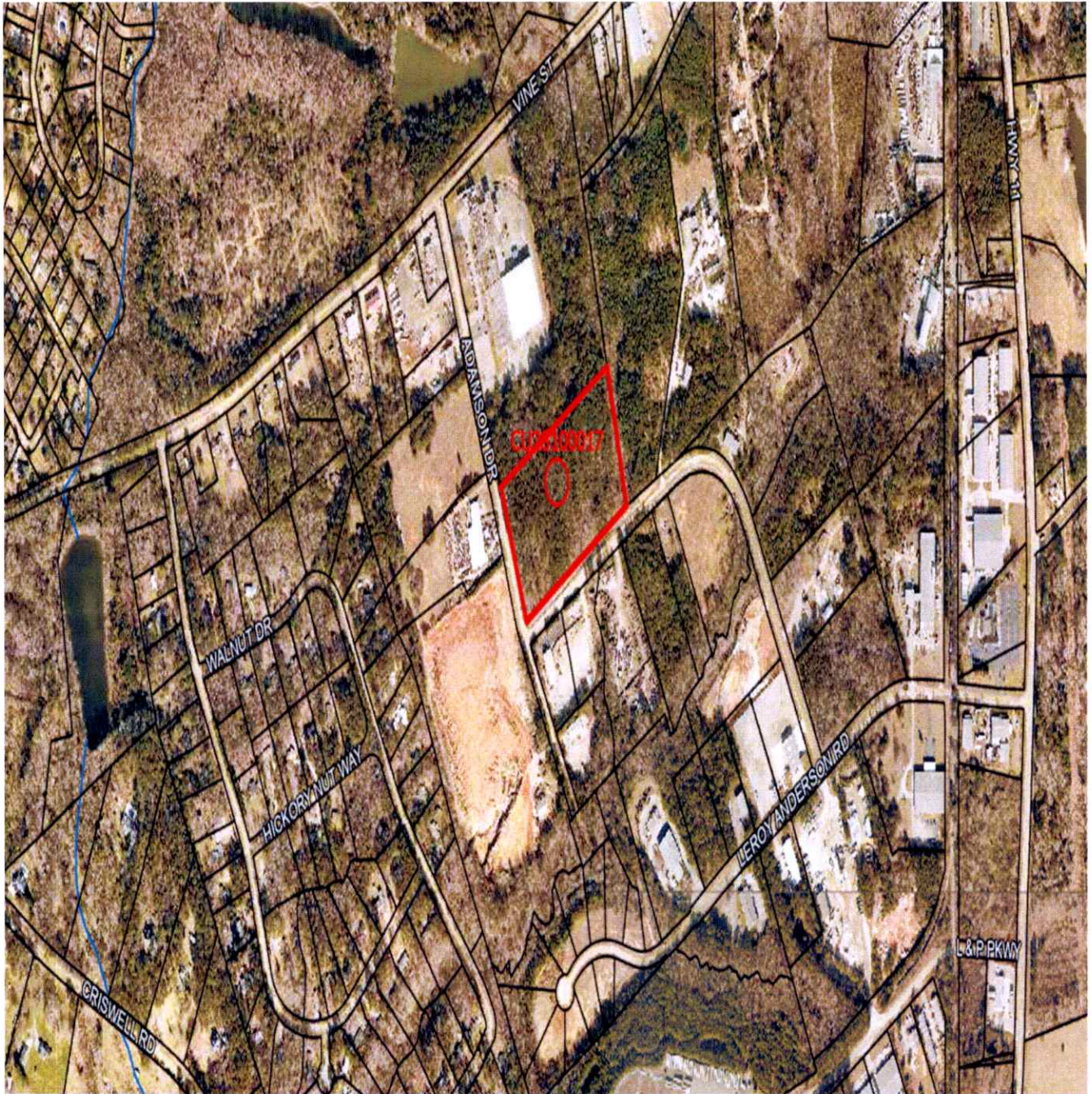
Address: 898 Adamson Drive, Monroe, Georgia 30655

Map Number: C1350028A00

Site Area: 10 acres

Character Area: Employment Center

District 5: Commissioner–Jeremy Adams Planning Commission –Tim Hinton



Existing Site Conditions: Property consists of 10 acres.

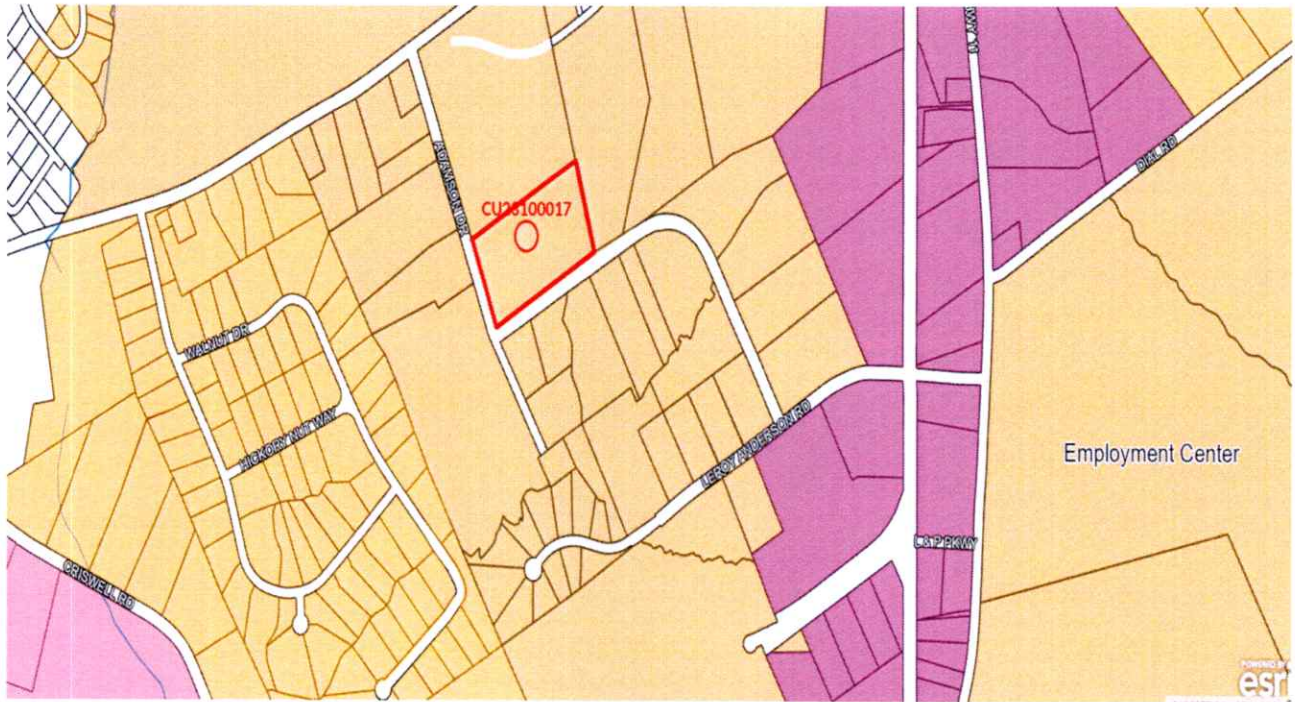
The surrounding properties are zoned I1 which is M1.



Subdivisions surrounding property:



The Future Land Use Map for this property is Employment Center.



History: No History

Staff Comments/Concerns:

Comments and Recommendations from various Agencies:

Public Works: Public Works recommends that a commercial driveway be installed to site if approved.

Sheriffs' Department: This will not impact the Walton County Sheriff's Office.

Water Authority: The property is located within the City of Monroe Service Area.

Fire Department: Potential for haz-mat incidents with trash, rubbish and recycling debris. Water run-off into the soil from fire suppression activities.

Fire Marshal: Shall comply with all current codes and ordinances set forth by State Fire Safety Minimums, NFPA, International Fire Code, and Walton County Ordinances.

Board of Education: Will have no affect on the Walton County School System.

DOT Comments: Will not need to coordinate with Georgia DOT.

City of Monroe: Logan Propes sent in a letter dated November 29, 2023 which is attached hereto.

PC RECOMMENDATIONS 12/14/2023:

- 4.1 CU23100017-Conditional Use on 10 acres for a solid waste transfer station- Applicant/Owner: Buddy R Johnson/DAB Properties LLC-located on 898 Adamson Dr-Map/Parcel C1350028A00-District 5.

Presentation: Andrea Gray represented the case. She stated that she represents Buddy Johnson of DAB Properties LLC. This property is located at 898 Adamson Drive, Monroe and on the map, it shows south of Vine Street and west of Highway 11.

Zoning shows I1 which is now M1. There is a concrete plant and inert land field also on this road. The proposed use would be a solid waste transfer station servicing Southern Sanitation. Southern Sanitation has been providing residential trash services in Walton County for 22 years and wants to have their own solid waste transfer station instead of having to go to the City of Monroe.

Operations include receiving and sorting household waste and then hauling off the sorted waste to a landfill or recycling center.

The site plan shows a 19,000 sq. ft. transfer building with an office and scale. The site plan also shows the buffers. There will be a 100 ft. side buffer and a 100 ft. rear buffer. There will be a 100 ft. buffer with a 3-foot vegetated berm and a 50 ft. buffer with a 3 foot vegetative berm. 36% of site being pervious services.

Mitigating Potential Impacts – Location & Site Plan. Located in the center of an industrial park; building and operations are concentrated in the center of the site; 100 ft. wooded buffers on three sides; buffers and 3-foot berms on road frontage; and truck traffic will use the bypass which will be finished before this project.

Ms. Gray stated that the City of Monroe had concerns about how this would impact the airport. Cy Nunnally Memorial Airport is more than 1 mile away – property boundary to property boundary, as the crow flies. The building is no taller than those already in the area and is surrounded by trees. Birds are not known hazards when transfer stations are maintained in accordance with EPD standards. Gwinnett County Airport runway is 2,400 feet from a transfer station and has a three-sided operation. Peachtree DeKalb Airport 1,200 feet from runway to a solid waste transfer station and transfer station is

three-sided.

Truck Traffic – Mitigation of Impacts – City of Monroe- truck traffic will bypass Monroe and trucks will no longer travel to/from the City's Cherry Hill transfer station thereby reducing truck traffic in the city. Walton County-truck traffic along collection routes will be the same. Trucks coming to/from the transfer station will use the 4.7-mile bypass to reduce impacts to county roads.

Ms. Gray stated that they are requesting approval of a conditional use permit to allow for operation of a solid waste transfer station to service Southern Sanitation; no rezone is required; no character area change is required; no variances are requested; and EPD will regulate operations.

Peachtree has a building open on 3 sides and 3 roll up doors. No trash will be outside the building. They will use a misting system to control odor and fans installed for dust & odor and it will be carbon filtrated.

Pete Myers asked if Southern Sanitation will be the only one dumping there and Ms. Gray stated that this was the intention right now. Buddy Johnson reiterated and stated that yes, Southern Sanitation is the only one but if any other company wants to dump that it will be allowed. Mr. Johnson stated that he runs 21 trucks about 6 to 7 times a day. Mr. Myers asked how many loads are expected to come in and Mr. Johnson stated that with this one and the one that was approved for Garrett that Walton County would not need one for a while.

Keith Prather stated that the location is good and will keep a lot of trucks out of town. He was concerned about the smell.

Timothy Kemp asked about the paving - one section is gravel but on each side is paved.

Josh Ferguson stated that the property is located in an industrial park and land use is appropriate for this use and it is in proximity to the bypass and is in support of this use.

Josh Ferguson asked if you had to weigh your own trash and Mr. Johnson stated that yes but they still have to dump with the big boys.

John Pringle asked if they handled glass and Mr. Johnson stated that they did not that The glass has been out of the recycle thing for a while.

John Pringle stated they still recycle on 81 and place in Atlanta and it will be interesting to see what will happen.

Buddy Johnson stated that the station will be closed on Sunday and open Monday – Saturday 4:00 a.m. – 6:00 p.m.

Speaking: Mark Still who owns property at 850 Adamson spoke and stated that he has been there since 1997. He has a concern about the rodents and the odor. He also stated that when you go to Athens that you can smell the odor even with air freshener in

the car. He went on to say that the County just approved 100 acres to be under construction for a subdivision and do these people know about this transfer station. He also stated that their property values will probably diminish. He went on to state that he was one of the first buildings on Adamson Drive and he has seen 3 concrete companies come and he hasn't seen any improvement of Adamson Drive. He also stated that they can't work on tractor trailers in the summertime because of all the dust. He stated that surrounding streets aren't constructed well enough to handle this type of business. He stated that he is now a police officer. He stated that with trucks going up and down Adamson Drive that when he goes to the shop that everything will be covered in dust. He stated that as far as the Monroe Bypass that most of the trucks will come to Adamson Drive. He stated that 21 trucks coming on Vine Street and Breedlove Drive is not good.

Mr. Still said there was a fire at the inert landfill, and the only fire station goes all the way to Social Circle. Adamson Drive needs major improvements.

Mr. Still asked if the county has rules currently in place for a transfer station and Ms. Parker Director advised that we did.

He has seen no improvements in this area and the tax base has gotten more.

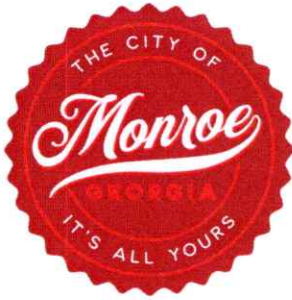
Andrea Gray came back for rebuttal and stated that she appreciates Mr. Still's concerns and thanks him for his service as a police officer. She stated that as far as the smell that they will have a misting system and the building will be enclosed. As far as Vine Street that property is in the City. Where this property is located it was zoned Industrial. This use is in character of the area. The industrial part has been there a long time before this subdivision was developed.

As for Adamson Drive they would love the county to fix the roads but this is not necessary to approve this conditional use as far as conditions with roads and service.

There is a Fire Station 2 miles down the Highway. Property will be adequately protected.

Recommendation: John Pringle made a motion to approve with the following conditions:

1. Proposed facility in general accordance with the site plan specifically the buffers.
 2. Reduced operating hours – closed Sunday, 4am-6pm Monday-Saturday.
 3. Clean floors daily per EPD regulations.
 4. Trash handling operations will occur inside the building which will have three permanent sides and roll-up doors on the fourth side which will be closed when not in operation.
 5. Misting system will be installed to reduce odor.
 6. Tank will store leachate and cleaning runoff and will be pumped out as needed.
- with a second by Keith Prather. The motion carried unanimously.



 215 N Broad Street
Monroe, GA 30655

 (770) 267-3429

 lpropes@monroega.gov

November 29, 2023

Tracie Malcom
Zoning Coordinator
126 Court St.
Monroe, Georgia 30655

RE: CU23100017: 898 Adamson Drive, Monroe, Georgia 30655

Dear Ms. Malcom

Please accept this letter as formal comment from the City of Monroe regarding the conditional use application to be before your Planning & Zoning Commission and Board of Commissioners.

The City of Monroe has multiple concerns related to construction and operation of the DAB Properties Transfer Station. The primary concern is heavy truck traffic to and from Monroe to the Oak Grove Landfill potentially, and then from increased garbage refuse truck traffic through the middle of Monroe's historic and award-winning Downtown along S.R. 11 prior to the completion of the State of Georgia connector route (PI 0000411 – S.R. 83 truck connector). Once completed, there would still be traffic that would undoubtedly be placed on S.R. 11 for shorter routes of travel to the proposed property located at 898 Adamson Drive in Walton County.

The other concerns of note are increased trash in the rights-of-way of the City of Monroe, and the added stress on our infrastructure of streets in Downtown due to increased heavy truck traffic, even after the completion of the S.R. 83 truck connector as mentioned above.

The current zoning for the property is identified as M1 (Light Industrial District) on the Walton County Zoning Map. Section 250.A of the Walton County Land Development Ordinance describes the purpose of the M1 Industrial District as primarily for wholesale warehousing, trade shops, and light manufacturing uses. Section 250.A further states the intent of the M1 Industrial District is to establish areas of industrial use which would be less objectionable by reasons of dust, odor, noise, traffic safety or congestion, than those of the M2 Heavy Industrial District. A solid waste transfer station is not compatible with the purpose or intent of the M1 Industrial District due to the intensity of the use as a potentially major contributor to odor while in the process of handling solid waste. Even with the facility being indoors, transfer and collection trucks will routinely frequent the site contributing to a scenario where the odor involved with solid waste will trespass to other properties in the vicinity and in the City of Monroe.

The proposed development indicates only a septic tank drain field will be utilized for waste treatment for a single bathroom comprising a toilet and a sink. Leachate resulting from the truck to truck waste transfer process has not been addressed or even considered as part of the proposed development, which raises an important question of how will leachate be treated if the site only has a septic tank for a toilet and a sink? The City of Monroe has concerns regarding the lack of planning for wastewater treatment involved in the solid waste transfer process and potential negative environmental impacts to adjoining properties in the City of Monroe.

Finally, a major concern exists as it relates to the flight path of the Cy Nunnally Memorial Airport and the potential increase in wildlife as stated by the Georgia Department of Transportation Airport Safety Data Program Manager, Alan Hood. His response is as follows; *this waste sorting building is 1 mile off of the runway of the Cy Nunnally Memorial Airport (D73). It is outside of the runway protection zone, but is within the approach and departure area. An FAA Form 7460-1 should be submitted to the Federal Aviation Administration via <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.*

Enclosed waste-handling facilities that receive garbage behind closed doors; process it via compaction, incineration, or similar manner; and remove all residue by enclosed vehicles generally are compatible with safe airport operations, provided they are constructed and operated properly and are not located on airport property or within the Runway Protection Zone. These facilities should not handle or store putrescible waste outside or in a partially enclosed structure accessible to hazardous wildlife. Trash transfer facilities that are open on one or more sides; or store uncovered quantities of municipal solid waste outside, even if only for a short time; or use semi-trailers that leak or have trash clinging to the outside; or do not control odors by ventilation and filtration systems (odor masking is not acceptable) do not meet the FAA's definition of fully enclosed trash transfer stations. The FAA considers fully enclosed waste-handling facilities constructed or operated incorrectly incompatible with safe airport operations if they are located closer than 10,000' of an airport.

The City of Monroe as a sponsor of the Cy Nunnally Memorial Airport considers this a major concern as it relates to waste drawing wildlife into the flight pattern of the airport, thus creating danger to life hazard.

Sincerely,



Logan Propes
City Administrator
City of Monroe

Conditional Use Application # CU 23100017

Planning Comm. Meeting Date 12-14-2023 at 6:00PM held at **WC Historical Court House-111 S Broad Street, Monroe, Ga (2nd Floor)**
Board of Comm Meeting Date 01-09-2024 at 6:00PM held at **WC Historical Court House**
You or a representative must be present at both meetings

Please Type or Print Legibly

Map/Parcel C1350028A00

Applicant Name/Address/Phone # DAB Properties, LLC
550 Mountain Trail
Monroe, Georgia 30655
E-mail: buddyjohnson@att.net
Phone # 770-527-9595

Property Owner Name/Address/Phone same as Applicant

(If more than one owner, attach Exhibit "A")

Location 898 Adamson Dr, Monroe Present Zoning I-1 (mi) Acreage 10 acres

Existing Use of Property: vacant
Existing Structures: none

Property is serviced by:
Public Water: X Provider: City of Monroe Well: _____
Public Sewer: _____ Provider: _____ Septic Tank: X

The purpose of this conditional use is: to construct a solid waste transfer station within an industrial area for use primarily in connection with Southern Sanitation's operations.

The above statements and accompanying materials are complete and accurate. Applicant hereby grants permission for planning and zoning personnel to enter upon and inspect the property for all purposes allowed and required by the Comprehensive Land Development Ordinance.

Signature Buddy Johnson Date 10/30/2023 \$ 350.00 Fee Paid

Public Notice sign will be placed and removed by P&D Office
Signs will not be removed until after Board of Commissioners meeting

Office Use Only:

Existing Zoning I1 (mi) Surrounding Zoning: North I1 (mi) South I-1 (mi)
East I1 (mi) West I1 (mi)
Comprehensive Land Use: Employment Center
Commission District: S-Jeremy Adams Watershed: _____

I hereby withdraw the above application _____ Date: _____

AGENT AUTHORIZATION

Date: _____ Tax Map and Parcel Number(s): C1350028A00

PROPERTY ADDRESS: 898 Adamson Drive, Monroe, Georgia 30655

PROPERTY OWNER: DAB Properties, LLC
550 Mountain Trail
Monroe, Georgia 30655

APPLICANT: DAB Properties, LLC
550 Mountain Trail
Monroe, Georgia 30655

ATTORNEY/AGENT: Andrea P. Gray, LLC
300 E Church Street
Monroe, GA 30655
(678) 364-2384

ACTION: Conditional use Permit on 10 acres in an industrial area for use as a solid waste transfer station

The undersigned states under oath that it is the owner of the property and hereby authorizes Applicant through its Attorney/Agent to submit, execute and prepare any and all documents relating to or speak on its behalf regarding the request for a conditional use permit for the property referenced herein.

ATTORNEY/AGENT

[Signature]

BY:

Sworn to and subscribed before me this 27 Day of October 2023

[Signature]
NOTARY PUBLIC



APPLICANT: DAB Properties, LLC

[Signature]
BY:

Sworn to and subscribed before me this 27 Day of October 2023

[Signature]
NOTARY PUBLIC



Standard Review Questions

Conditional Use Permit Standards under Section 106

1. Adequate provision is made such as setbacks, fences, etc., to protect adjacent properties from possible adverse influence of the proposed use, such as noise, dust vibration, glare, odor, electrical disturbances, and similar factors.

Applicant designed the site layout to be protective of neighboring properties in the industrial park. There are no residential properties adjacent to the property. The property is bordered by industrial properties to the east and north and by Adamson Drive to the west and south. There will be 100-foot buffers between the properties to the north and east and the western boundary with Adamson Drive. The southern boundary with Adamson Drive will include a 50-foot buffer. Along both sides of Adamson Drive, there will also be a 3-foot vegetated berm to mitigate visual and potential noise impacts. The transfer building itself is in the middle of the 10-acre site.

In addition to the site layout, the business operations will also provide protection for adjoining property owners. All dumping and sorting of trash/recycling will be done in the 3-sided building. Applicant will use a misting system inside the building to reduce odors and will follow all EPD regulations regarding regular cleanings. Operating hours will be consistent with other industrial uses with no operations running on Sundays and ceasing at 6pm on the other six days.

2. Vehicular traffic and pedestrian movement on adjacent streets will not be hindered or endangered

Applicant's site plan includes a dedicated entrance and exit – one on the western side of the property and one on the southern side of the property. Separating the entrance/exit will provide for a more streamlined flow of traffic. Applicant anticipates approximately 4 trucks per hour visiting the site. The transfer station is primarily to accommodate Southern Sanitation's operations which is already a trash and recycling pickup provider in Walton County. The estimated volume of traffic coming and going from the site will not overburden the already industrial area.

3. Off-street parking and loading and the entrances to and exists from such parking and loading will be adequate in terms of location, amount and design to serve the use.

The parking and loading areas are concentrated in the center of the 10-acre site and are more than adequate to accommodate the business operations. All unloading/loading and sorting will occur within the 19,000 sf building.

4. Public facilities and utilities are capable of adequately serving the proposed use.

The proposed transfer station will not burden public facilities or utilities. The site will be served by water from the City of Monroe. It will use an on-site septic system. The water and sewer usage

are limited to one staff restroom and water used to spray and clean inside the building. Electricity requirements are not substantial and will be provided by Walton EMC.

5. The proposed use will not adversely affect the level of property values or general character of the area.

The proposed use is consistent with the other industrial uses and general character within the Leroy Anderson Industrial Park. The property is surrounded by other industrial properties. Applicant's development will add value to the tax base by transforming vacant property into an operational, tax revenue-generating business.



Andrea P. Gray LLC

Attorney at Law

October 30, 2023

Ms. Charna Parker
Director
Walton County Planning and Development
303 S Hammond Drive
Suite 98
Monroe, GA 30655

Re: Applicant: DAB properties, LLC
Property: 898 Adamson Drive, Monroe GA
Tax Parcel: C1350028A00
Request for a Conditional Use Permit to operate a solid waste transfer station on
10-acres

Dear Ms. Parker:

DAB Properties, LLC (“Applicant”) seeks to build a solid waste transfer facility to serve Southern Sanitation on a 10-acre property at 898 Adamson Drive, Monroe, Georgia (the “Property”). Applicant’s plans include a 19,000 square foot building, a scale station and an office. The Property is currently zoned I-1 and completely surrounded by other properties zoned I-1 and used for industrial purposes. A solid waste transfer station is allowed as a conditional use under the existing zoning.

The site design incorporates large buffers, vegetated berms, and access accommodations which will help mitigate impacts to adjoining property owners. The Property is bordered by industrial properties to the east (Ready Mix USA, LLC) and north (PET Acquisition Corp) and by Adamson Drive to the west and south. The properties across Adamson Drive are also industrial. There will be 100-foot buffers between the properties to the north and east and the western boundary with Adamson Drive. The southern boundary with Adamson Drive will include a 50-foot buffer. Along both sides of Adamson Drive, there will also be a 3-foot vegetated berm to mitigate visual and potential noise impacts. The transfer building itself is in the middle of the 10-acre site.

Applicant’s operations will also help mitigate impacts to adjoining properties. It will install misters inside the transfer building to help mitigate smells, which combined with the distance from the building to adjacent properties and the wooded buffer, should significantly reduce any odor impacts. The building itself is 250+ ft from the eastern and western boundaries and 120+ft from



300 E Church Street, Monroe, GA 30655
(678) 364-2384 www.andreapgray.com

the northern and southern property boundaries. Its hours and days of operation will be limited to Monday-Saturday, 4am to 6pm and approximately four employees will staff the site. All waste will be handled inside the building and all EPD guidelines for washing inside the facility will be followed. The flow of trucks coming and leaving the facility will be routed through a separate entrance and exit, one on the western side of the property and one on the southern boundary with Adamson Drive. The transfer station is primarily to serve Southern Sanitation's needs. Southern Sanitation is already a trash and recycling service provider in Walton County and this new transfer station will reduce demand on the already overburdened Monroe transfer station and add tax revenues to the county. On average, Applicant expects four trucks per hour coming and going from the transfer station. This volume should not overly burden local roads and is consistent with other industrial uses. The Property is also a short distance to Hwy 11 which will be the primary route used to access it.

Applicant respectfully requests approval of a conditional use permit to allow for construction of a solid waste transfer station on the Property. A rezoning is not required given that it is already zoned I-1. The location within an industrial park is an ideal location for the transfer station which will primarily serve a business already operating in Walton County, Southern Sanitation.

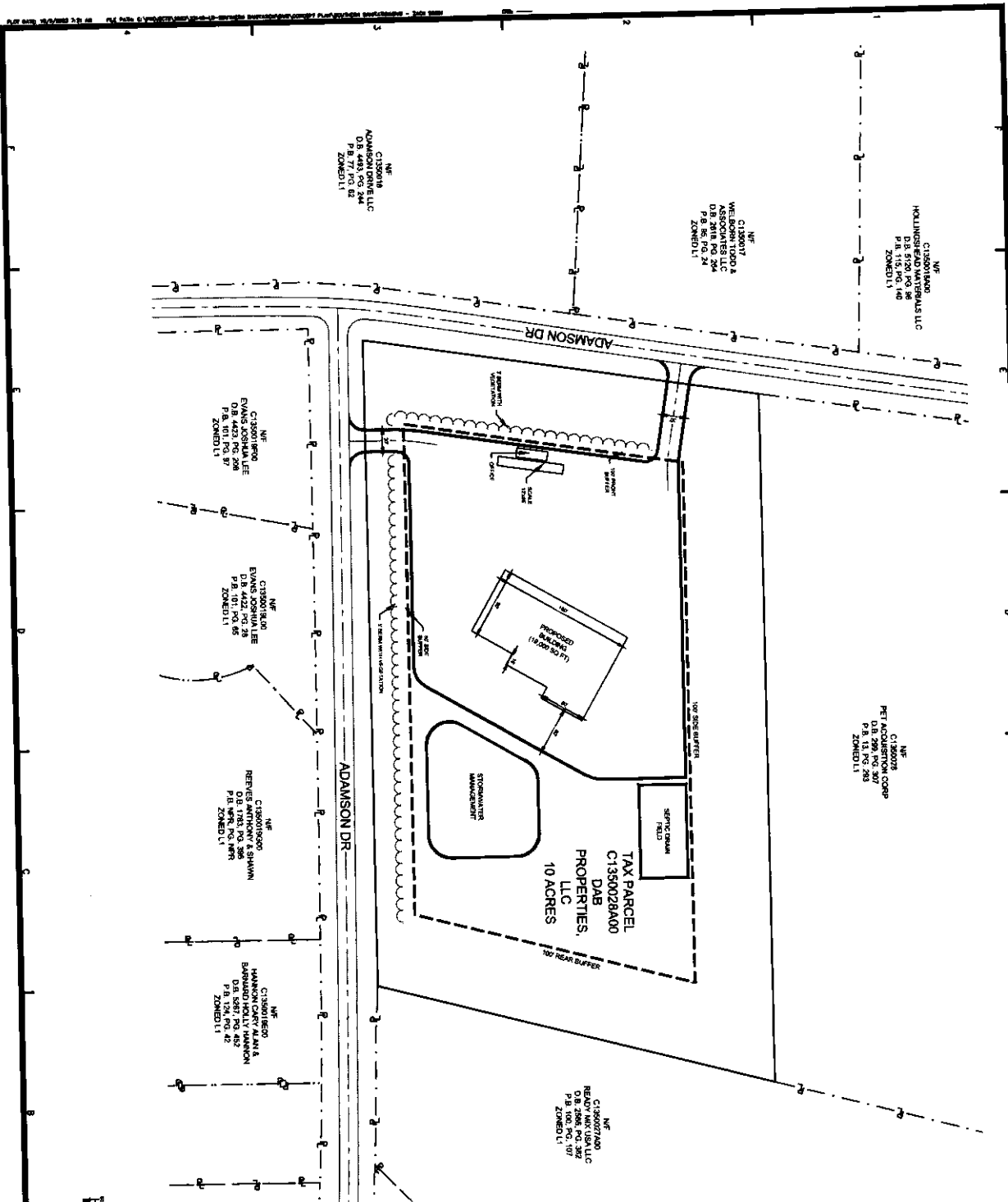
Please let me know if you have any questions.

Sincerely,

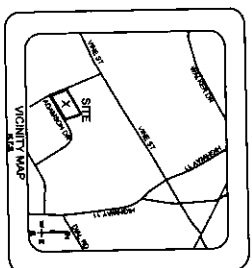


Andrea Gray
Applicant's Representative





TAX PARCEL
 C1350028A00
 DAB
 PROPERTIES,
 LLC
 10 ACRES

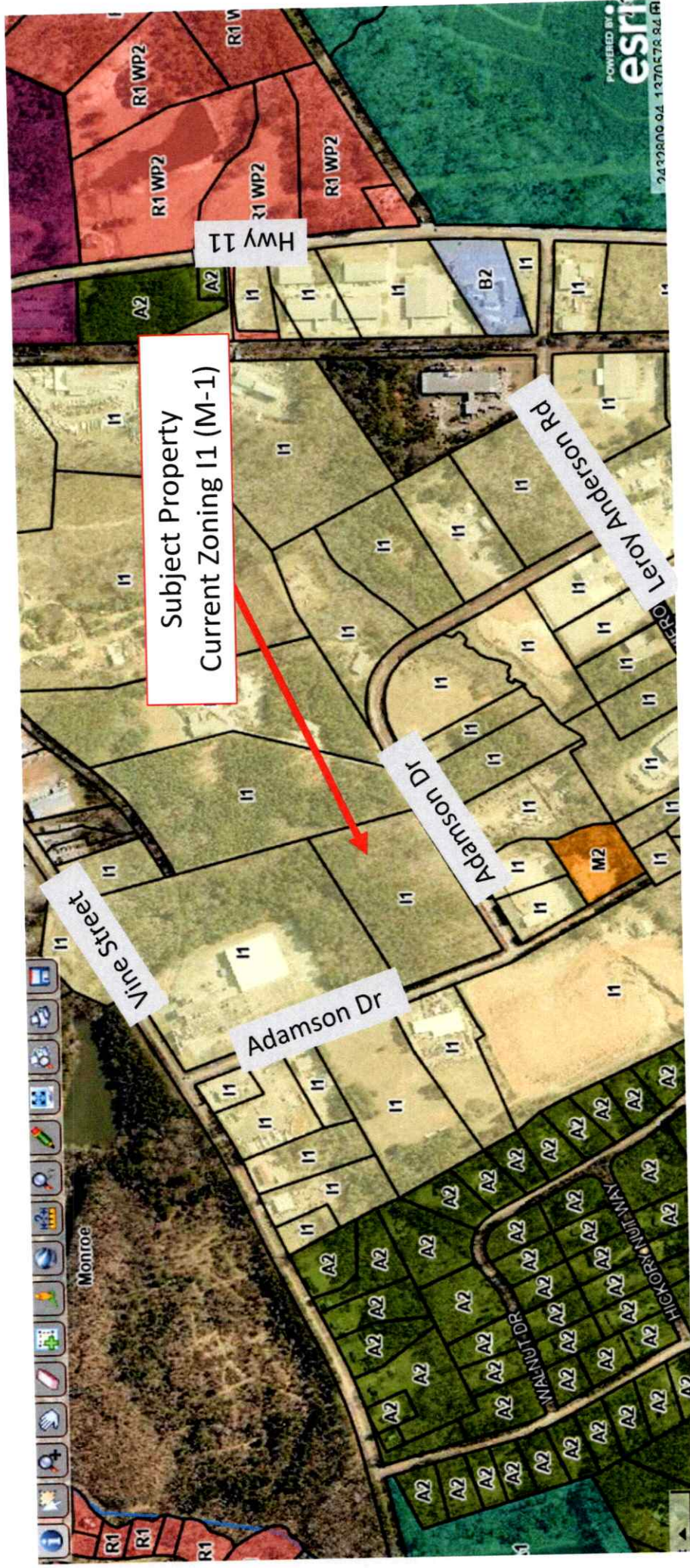


PROJECT DATA
 APPLICANT/OWNER - DAB PROPERTIES, LLC
 ACREAGE - 10 ACRES
 CURRENT ZONING - L1
 PROVIDER FOR WATER - CITY OF MONROE
 ONSITE SEPTIC SYSTEM
 IMPERVIOUS - 63.66%
 PERVIOUS - 36.34%

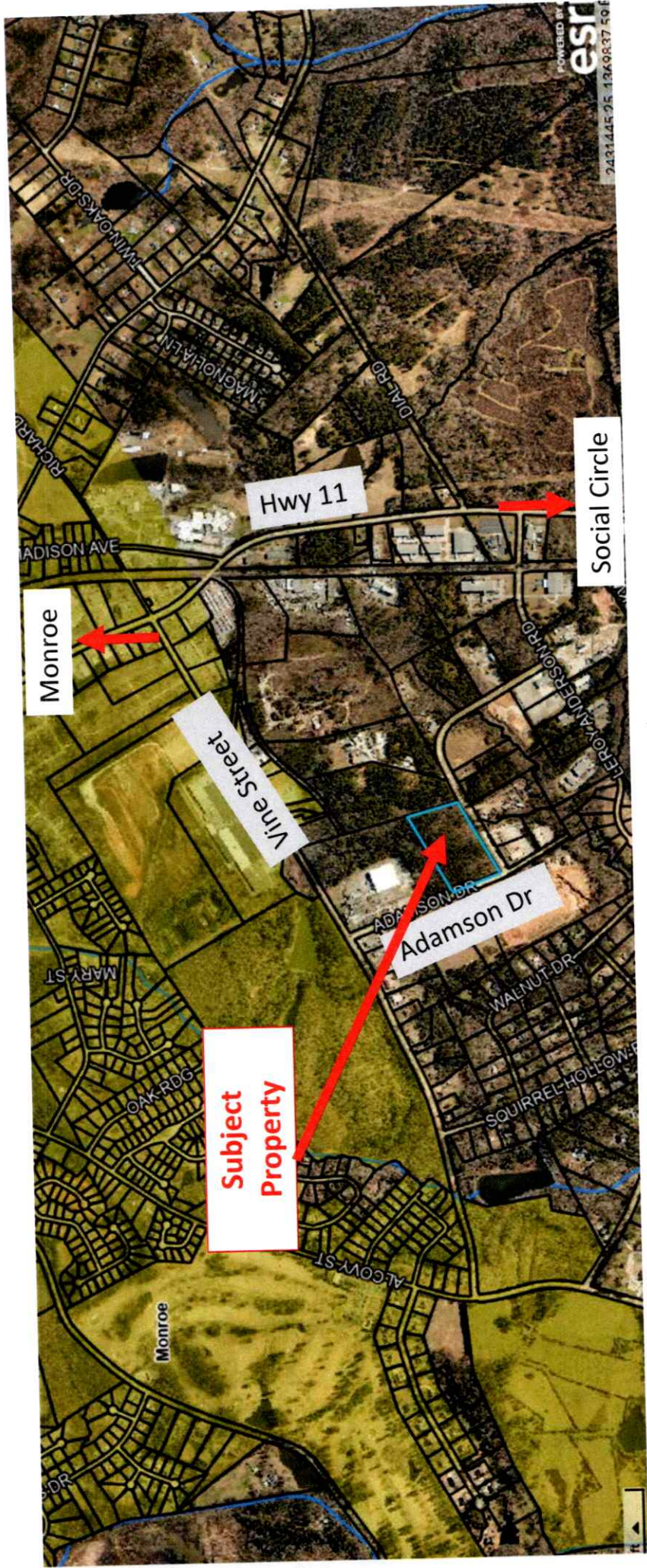


<p>1 OF 1</p>	<p>DATE: 10/26/23 NO: 23158 DESCRIPTION: MANUFACTURING</p>	<p>CONCEPT PLAN</p>	<p>DAB PROPERTIES, LLC</p> <p>LAND LOT 35, DISTRICT 3, MONROE, WALTON, GEORGIA</p>	<p>PRECISION CONSULTANTS, LLC</p> <p>planners • engineers • architects • surveyors</p> <p>Georgia Land Surveying Firm COA # LS1000313 400 The Boulevard, Tallahassee, Florida 32304 904.224.8000 • www.precision-consultants.com</p>	<p>STAMP</p>												
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>DATE</th> <th>NO</th> <th>DESCRIPTION</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>		DATE	NO	DESCRIPTION				<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>FIELD</th> <th>DRAWN</th> <th>CHECKED</th> </tr> </thead> <tbody> <tr> <td>LD</td> <td>ZJD</td> <td>JLP</td> </tr> </tbody> </table>		FIELD	DRAWN	CHECKED	LD	ZJD	JLP	<p>© 2023 PRECISION CONSULTANTS, LLC ALL RIGHTS RESERVED.</p> <p>These documents are prepared by Precision Consultants, LLC and are the property of Precision Consultants, LLC. No part of these documents may be reproduced, stored in a retrieval system, or transmitted, in any form or by any means, without the prior written permission of Precision Consultants, LLC.</p>	
DATE	NO	DESCRIPTION															
FIELD	DRAWN	CHECKED															
LD	ZJD	JLP															

Zoning Map



Location Map





Andrea P. Gray LLC

Attorney at Law

October 30, 2023

Notice of Preservation of Constitutional Objections

Re: Applicant: DAB Properties, LLC
Owner: DAB Properties, LLC
Property: 898 Adamson Drive, Monroe, Georgia 30655
Request for a Conditional Use Permit for 10 acres for a solid waste transfer station

Georgia law requires that Applicant include in its rezoning/conditional use permit request record a statement of constitutional objections to put the deciding board on notice of the Applicant's assertion of its constitutional and legal rights to the requested rezoning/permit. In accordance with this requirement, Applicant asserts the following:

The current zoning restrictions of the Subject Property restricts said property in an unreasonable manner, is unconstitutional, null and void in that the restriction to the current zoning classifications affords the Applicant no reasonable use of the Property and is the equivalent of a taking of the Applicant's property rights without payment of just and adequate compensation and without due process in violation of the Fifth Amendment and Fourteenth Amendments to the Constitution of the United States, and Article I, Section I, Paragraph I, and Article I, Section III, Paragraph 1 of the Constitution of the State of Georgia.

A refusal by the board to approve the rezoning/conditional use permit requested by the Applicant to permit a reasonable economic return on the Applicant's investment and a reasonable use of the Property would therefore be unconstitutional, null and void and would be arbitrary, capricious and without a rational basis, thus constituting an abuse of discretion. Further, a refusal by the board would discriminate in an arbitrary, capricious, and unreasonable manner between the Applicant and owners of similarly situated properties in violation of the Equal Protection Clause of the Fourteenth Amendment to the Constitution of the United States, and Article I, Section I, Paragraph II of the Georgia Constitution.

The continued application of the current zoning to the Subject Property results in little or no gain to the public in general and fails to promote the health, safety, morals or general welfare of the public and does not bear a substantial relation to the objectives of the Walton County, Georgia Zoning Ordinance, and would constitute a substantial reduction of the property value of the Applicant and is therefore confiscatory and void.

By filing this Statement of Constitutional Rights, the Applicant reserves all rights and remedies available to them under the United States Constitution, the Georgia Constitution, all applicable federal state and local laws and ordinances, and in equity.



300 E Church Street, Monroe, GA 30655
(678) 364-2384 www.andreapgray.com