

**DATE:** December 11, 2023

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**TO:** Chairman Phil D. Miller, Douglas County Commission  
**ATTN TO:** Phil Shafer, Zoning Administrator, Douglas County  
**FROM:** Mike Alexander, COO, Atlanta Regional Commission  
**RE:** Development of Regional Impact (DRI) Review

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ARC has completed a regional review of the below DRI. ARC reviewed the DRI's relationship to regional plans, goals and policies – and impacts it may have on the activities, plans, goals and policies of other local jurisdictions as well as state, federal and other agencies. This final report does not address whether the DRI is or is not in the best interest of the host local government.

**Name of Proposal:** Lithia Springs Data Center DRI 4087

**Submitting Local Government:** Douglas County

**Date Opened:** November 24, 2023

**Date Closed:** December 11, 2023

**Description:** A DRI review of a project to construct two three-story data center buildings with a total square footage of 878,886 SF along with ancillary support elements on a 44-acre currently wooded site off of Factory Shoals Road in Douglas County.

**Comments:**

**Key Comments**

*The Atlanta Region's Plan assigns the Established Suburbs growth management designation to the project site. The project is not aligned with Established Suburbs policies which focus on preserving existing single-family development and promoting compatible infill development.*

*The project is not aligned with regional land use, climate change, and environmental policies which encourage the retention of forested greenfield areas and avoidance of water resource impacts. It could be better aligned with these policies by preserving additional wooded area and avoiding stream buffer impacts.*

*The proposed site plan shows a 130,000 gallon oil containment area at the edge of a stream buffer. The applicant has clarified that this facility is a requirement of the substation for GA Power, and has been over-sized per their specifications. Per watershed protection regulations, if this facility is determined to handle hazardous materials of the types and amounts determined by Georgia DNR, its operation will need to be on*

*impermeable surfaces having spill and leak collection systems as prescribed by Georgia DNR in addition to any local, state or federal requirements.*

*The project proposes multiple intrusions into substantial state and county protected stream buffer areas that will require variances.*

*Douglas County provided comments noting that the project is aligned with the County's designation of the area as the County's "Data District."*

*The project is expected to generate approximately 870 daily new vehicular trips.*

### **General Comments**

The Atlanta Region's Plan, developed by ARC in close coordination with partner local governments, is intended to broadly guide regional development in the 12-county metro region to ensure that required infrastructure and resources are in place to support continued economic development and prosperity. The Plan assigns a relevant growth management category designation to all areas in the region– Established Suburbs for this project – and provides accompanying growth policy recommendations which are detailed at the end of these comments.

### **Transportation and Mobility Comments**

ARC's Transportation Access and Mobility Group comments are attached.

The project is projected to generate 870 daily new vehicular trips.

Care should be taken to ensure that the development, as constructed, promotes an interconnected, functional, clearly marked and comfortable pedestrian experience on all driveways, paths, entrances, and parking areas. To the maximum extent possible, new driveways and intersection corners where pedestrians will cross should be constructed with minimal curb radii to reduce speeds of turning vehicles and decrease crossing distances for pedestrians.

### **ARC Natural Resources Group Comments**

#### **Watershed Protection**

The project property is located in the portion of the Chattahoochee River watershed drains into the Chattahoochee River Corridor, but it is not within the 2000-foot Chattahoochee River Corridor and is not subject to the requirements of the Metropolitan River Protection Act or the Chattahoochee Corridor Plan. This portion of the watershed drains into the Chattahoochee downstream of the existing public water supply intakes on the Chattahoochee. However, proposed intakes in South Fulton and Coweta County would include this portion of the Chattahoochee River watershed as a large water supply watershed (over 100 square miles), as defined under the Part 5 Criteria of the 1989 Georgia Planning Act. However, for large

water supply watersheds without a water supply reservoir, the only applicable Part 5 requirements are restrictions on hazardous waste handling, storage and disposal within seven miles upstream of a public water supply intake. This property is more than seven miles upstream of the nearest proposed public water supply intake on the Chattahoochee.

The property is also located in the Sweetwater Creek Water Supply Watershed, which is also a large (over 100 square miles) water supply watershed as defined under the Part 5 Criteria of the 1989 Georgia Planning Act.

As stated above, there are no specific Part 5 Criteria for buffers or impervious surface limits in large (over 100 square miles) water supply watersheds such as Sweetwater Creek Water Supply Watersheds. However, the Part 5 Criteria do place restrictions on hazardous waste handling, storage and disposal within seven miles upstream of a public water supply intake. This project is within seven miles upstream of the City of East Point Intake on Sweetwater Creek. The proposed site plan shows an oil containment area just outside the stream buffers shown on the plan. As specified in the Part 5 Criteria, if this facility is determined to handle hazardous materials of the types and amounts determined by Georgia DNR, its operation will need to be on impermeable surfaces having spill and leak collection systems as prescribed by Georgia DNR. This is in addition to any local, state or federal requirements.

#### Stream Buffers

The USGS coverage for the project area and the submitted site plan both show two blue-line branches of an unnamed tributary to Peachtree Creek with headwaters starting on the western side of the project property and flowing off the property to the northwest. The project site is within the Douglas County Sweetwater Creek/ East Point Intake Basin subwatershed, in which the County requires a 150-foot impervious surface setback and a 100-foot undisturbed buffer on all streams. The submitted site plan shows both that buffer and setback as well as the 25-foot State Sediment and Erosion Control Buffer on both streams. The site plan also shows two other buffers: a 112.5-foot impervious setback and a 75-foot undisturbed buffer, both with notes stating that they are 25% reductions through administrative variances. Which buffers apply will depend on whether the variances are granted by the County.

The submitted site plan shows intrusions into the setbacks and buffers on both streams. On the northernmost stream, a portion of a parking area adjacent to Proposed Building A and a portion of a proposed stormwater management area intrude into the 150-foot setback. If a setback variance is granted by the County, these areas will not be buffer intrusions. If the setback variance is not granted, the intrusions may require variances from the County.

On the southern stream, portion of the proposed substation and a proposed retaining wall intrude on the 150-foot and 112.5-foot setbacks and the 100-foot undisturbed buffer, and the retaining wall nearly touches the 75-foot undisturbed buffer. These intrusions may require variances from Douglas County. Any unmapped streams on the property may also be subject to the County buffer requirements. Any unmapped State waters identified on the property may also be subject to the State 25-foot Sediment and Erosion Control buffer.

### **Environmental Comments**

As the limited remaining forested and natural areas of the Atlanta region continue to be developed at a rapid pace while climate change creates warmer temperatures and more extreme weather events, there is a need to carefully plan for the future to ensure the retention and proper management of an optimal amount of these critical environmental assets. Most of the site's 44 acres, which are heavily wooded and provide extensive stormwater, air quality, and urban cooling benefits, will be cleared for the project which is not supportive of regional land use, climate change, and environmental policies. The project is located within close proximity to Sweetwater Creek State Park – the most visited state park in the state – to the west and is within the Sweetwater Creek Water Supply Watershed. While much of the wooded natural area to the east of the site has recently been developed for industrial use, development of the remaining wooded area west of the site up to the border of the State park with uses compatible with the area's natural character defined by forests and streams would be supportive of regional environmental and climate change policies. The project can support The Atlanta Region's Plan in general by incorporating other aspects of regional environmental policy, including green infrastructure and/or low-impact design, e.g., pervious pavers, rain gardens, vegetated swales, etc., in parking areas and site driveways, and as part of any improvements to site frontages.

### **Douglas County Comments**

Douglas County comments are attached. They include the planning staff's report on the project and additional comments on the UGPM Established Suburbs growth classification of the site.

### **Atlanta Region's Plan Growth Policy Considerations: Established Suburbs**

According to the Atlanta Region's Plan, Established Suburbs are areas where suburban development has occurred and are characterized by single-family subdivisions, commercial development, and office, industrial and multi-family development. These areas represent the part of the region that has recently reached "build-out." With few remaining large parcels for additional development, these are the areas in which the region may see the least amount of land-use change outside of retail and commercial areas. While there is still room for limited infill development, these areas will begin to focus more on redevelopment over the next 30 years.

Preservation of existing single-family neighborhoods is important, and wholesale change will most likely not occur in the single-family subdivisions that make up a majority of these areas. However, infill and redevelopment will occur in areas of retail/commercial concentrations, especially commercial corridors. The proposed project is not aligned with Established Suburbs policies which focus on preserving existing single-family development and promoting compatible infill development. More importantly, the project is not aligned with regional land use and environmental policies which encourage the retention of forested greenfield areas and avoidance of water resource impacts. It could be better aligned with these policies by preserving additional wooded area and avoiding stream buffer impacts. Douglas County leadership and

staff, along with the applicant team, should collaborate closely to ensure maximum sensitivity to nearby local governments, neighborhoods, and natural systems.

**THE FOLLOWING LOCAL GOVERNMENTS AND AGENCIES RECEIVED NOTICE OF THIS REVIEW:**

ATLANTA REGIONAL COMMISSION	GEORGIA DEPARTMENT OF NATURAL RESOURCE	GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS
GEORGIA DEPARTMENT OF TRANSPORTATION	GEORGIA REGIONAL TRANSPORTATION AUTHORITY	GEORGIA SOIL AND WATER CONSERVATION COMMISSION
GEORGIA ENVIRONMENTAL FINANCE AUTHORITY	GEORGIA CONSERVANCY	DOUGLAS COUNTY
CITY OF DOUGLASVILLE	COBB COUNTY	CITY OF MABLETON

For questions, please contact Donald Shockey at (470) 378-1531 or [dshockey@atlantaregional.org](mailto:dshockey@atlantaregional.org). This finding will be published to the ARC review website located at <http://atlantaregional.org/plan-reviews>.



## Developments of Regional Impact

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### DRI #4087

#### DEVELOPMENT OF REGIONAL IMPACT Initial DRI Information

This form is to be completed by the city or county government to provide basic project information that will allow the RDC to determine if the project appears to meet or exceed applicable DRI thresholds. Refer to both the [Rules for the DRI Process](#) and the [DRI Tiers and Thresholds](#) for more information.

#### Local Government Information

Submitting Local Government: Douglas  
Individual completing form: Phil Shafer  
Telephone: 770-920-7131  
E-mail: pshafer@douglascountygga.gov

\*Note: The local government representative completing this form is responsible for the accuracy of the information contained herein. If a project is to be located in more than one jurisdiction and, in total, the project meets or exceeds a DRI threshold, the local government in which the largest portion of the project is to be located is responsible for initiating the DRI review process.

#### Proposed Project Information

Name of Proposed Project: Lithia Springs Data Center  
Location (Street Address, GPS Coordinates, or Legal Land Lot Description): 808 Factory Shoals Rd., Lithia Springs, GA 30122  
Brief Description of Project: Construction of two - three-story data center buildings, each having a +/- 146,481 SF footprint, with a total square footage for both building of 878,886 SF

#### Development Type:

- |  |   |   |
|--|---|---|
| <input type="radio"/> (not selected)                       | <input type="radio"/> Hotels                                | <input type="radio"/> Wastewater Treatment Facilities |
| <input type="radio"/> Office                               | <input type="radio"/> Mixed Use                             | <input type="radio"/> Petroleum Storage Facilities    |
| <input type="radio"/> Commercial                           | <input type="radio"/> Airports                              | <input type="radio"/> Water Supply Intakes/Reservoirs |
| <input type="radio"/> Wholesale & Distribution             | <input type="radio"/> Attractions & Recreational Facilities | <input type="radio"/> Intermodal Terminals            |
| <input type="radio"/> Hospitals and Health Care Facilities | <input type="radio"/> Post-Secondary Schools                | <input type="radio"/> Truck Stops                     |
| <input type="radio"/> Housing                              | <input type="radio"/> Waste Handling Facilities             | <input type="radio"/> Any other development types     |
| <input checked="" type="radio"/> Industrial                | <input type="radio"/> Quarries, Asphalt & Cement Plants     |   |

If other development type, describe:  
data center

Project Size (# of units, floor area, etc.): 900,000 SF

Developer: SI ATL02A, LLC (c/o Stack Infrastructure) c/o Bohler Engineering

Mailing Address: 1700 Broadway

Address 2: Suite 1750

City: Denver State: CO Zip: 80290

Telephone: 678-695-6800

Email: emiller@stackinfra.com; buckland@bohlereng.com

Is property owner different from developer/applicant? ☐ (not selected) ☒ Yes ☐ No

If yes, property owner: IPI Atlanta II, LLC

Is the proposed project entirely located within your ☐ (not selected) ☒ Yes ☐ No

local government's jurisdiction?

If no, in what additional jurisdictions is the project located?

Is the current proposal a continuation or expansion of a previous DRI? ☐ (not selected) ☐ Yes ☒ No

If yes, provide the following information: Project Name: Project ID:

The initial action being requested of the local government for this project:

- ☐ Rezoning
- ☐ Variance
- ☐ Sewer
- ☐ Water
- ☐ Permit
- ☒ Other Special Use Permit application

Is this project a phase or part of a larger overall project? ☐ (not selected) ☐ Yes ☒ No

If yes, what percent of the overall project does this project/phase represent?

Estimated Project Completion Dates: This project/phase: single phase Overall project: May 2026

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Thank you for submitting your application. The DRI Application Number is 4087. To view the application at any time, you can go to <http://apps.dca.ga.gov/DRI/AppSummary.aspx?driid=4087>. Please contact your RDC if you have any questions or need to change any of the information on this form.

### DRI #4087

#### DEVELOPMENT OF REGIONAL IMPACT Additional DRI Information

This form is to be completed by the city or county government to provide information needed by the RDC for its review of the proposed DRI. Refer to both the [Rules for the DRI Process](#) and the [DRI Tiers and Thresholds](#) for more information.

#### Local Government Information

Submitting Local Government: Douglas  
Individual completing form: Phil Shafer  
Telephone: 770-920-7131  
Email: pshafer@douglascountygga.gov

#### Project Information

Name of Proposed Project: Lithia Springs Data Center  
DRI ID Number: 4087  
Developer/Applicant: SI ATL02A, LLC (c/o Stack Infrastructure) c/o Bohler Engineering  
Telephone: 678-695-6800  
Email(s): emiller@stackinfra.com

#### Additional 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

If yes, has that additional information been provided to your RDC and, if applicable, GRTA?  
☒ (not selected) ☐ Yes ☐ No

If no, the official review process can not start until this additional information is provided.

#### Economic Development

Estimated Value at Build-Out: \$380,930,665.00

Estimated annual local tax revenues (i.e., property tax, sales tax) likely to be generated by the proposed development: \$2,407,515/year

Is the regional work force sufficient to fill the demand created by the proposed project?  
☐ (not selected) ☒ Yes ☐ No

Will this development displace any existing uses?  
☐ (not selected) ☐ Yes ☒ No

If yes, please describe (including number of units, square feet, etc):



### Water Supply

Name of water supply provider for this site: Douglasville Douglas County Water and Sewer Authority (DDCWSA)

What is the estimated water supply demand to be generated by the project, measured in Millions of Gallons Per Day (MGD)?

0.031 MGD

Is sufficient water supply capacity available to serve the proposed project? ☐ (not selected) ☐ Yes ☒ No

If no, describe any plans to expand the existing water supply capacity:  
DDCWSA is working with several surrounding developments on a project to provide a new water tank and pump to provide additional pressure within the public system to accommodate this, and the surrounding, development.

Is a water line extension required to serve this project? ☐ (not selected) ☐ Yes ☒ No

If yes, how much additional line (in miles) will be required?

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### Wastewater Disposal

Name of wastewater treatment provider for this site: Douglasville Douglas County Water and Sewer Authority (DDCWSA)

What is the estimated sewage flow to be generated by the project, measured in Millions of Gallons Per Day (MGD)?

0.017 MGD

Is sufficient wastewater treatment capacity available to serve this proposed project? ☐ (not selected) ☒ Yes ☐ No

If no, describe any plans to expand existing wastewater treatment capacity:

Is a sewer line extension required to serve this project? ☐ (not selected) ☐ Yes ☒ No

If yes, how much additional line (in miles) will be required?

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### Land Transportation

How much traffic volume is expected to be generated by the proposed development, in peak hour vehicle trips per day? (If only an alternative measure of volume is available, please provide.)

870 daily trips, 109 AM peak hour trips, 91 PM peak hour trips

Has a traffic study been performed to determine 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

If yes, please describe below: Please refer to traffic study prepared by NV5 Engineers and Consultants, Inc.

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### Solid Waste Disposal

How much solid waste is the project expected to generate annually (in tons)?

1,608 TPY

Is sufficient landfill capacity available to serve this proposed project? ☐ (not selected) ☒ Yes ☐ No

If no, describe any plans to expand existing landfill capacity:

Will any hazardous waste be generated by the development? ☐ (not selected) ☐ Yes ☒ No

If yes, please explain:

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### Stormwater Management

What percentage of the site is projected to be impervious surface once the proposed development has been constructed? 48%

Describe any measures proposed (such as buffers, detention or retention ponds, pervious parking areas) to mitigate the project's impacts on stormwater management: The site will utilize buffers and green infrastructure, including grass swales, vegetated filter strips, and infiltration measures where feasible to provide runoff reduction and TSS removal. Storm water ponds will be utilized to provide water quality, channel protection, and detention in accordance with Douglas County and the Georgia Stormwater Management Manual requirements.

### Environmental Quality

Is the development located within, or likely 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 above, describe how the identified resource(s) may be affected: Project is located within a water supply watershed, which requires greater-than-typical stream buffers. Project will meet the Douglas County water supply watershed buffer requirements.

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**LITHIA SPRINGS DATA CENTER DRI**  
**Douglas County**  
**Natural Resources Review Comments**  
**December 4, 2023**

While ARC and the Metropolitan North Georgia Water Planning District have no regulatory or review authority over this project, the Natural Resources Group has identified County and State regulations that could apply to this property. Other regulations may also apply that we have not identified.

**Watershed Protection**

The project property is located in the portion of the Chattahoochee River watershed drains into the Chattahoochee River Corridor, but it is not within the 2000-foot Chattahoochee River Corridor and is not subject to the requirements of the Metropolitan River Protection Act or the Chattahoochee Corridor Plan. This portion of the watershed drains into the Chattahoochee downstream of the existing public water supply intakes on the Chattahoochee. However, proposed intakes in South Fulton and Coweta County would include this portion of the Chattahoochee River watershed as a large water supply watershed (over 100 square miles), as defined under the Part 5 Criteria of the 1989 Georgia Planning Act. However, for large water supply watersheds without a water supply reservoir, the only applicable Part 5 requirements are restrictions on hazardous waste handling, storage and disposal within seven miles upstream of a public water supply intake. This property is more than seven miles upstream of the nearest proposed public water supply intake on the Chattahoochee.

The property is also located in the Sweetwater Creek Water Supply Watershed, which is also a large (over 100 square miles) water supply watershed as defined under the Part 5 Criteria of the 1989 Georgia Planning Act.

As stated above, there are no specific Part 5 Criteria for buffers or impervious surface limits in large (over 100 square miles) water supply watersheds such as Sweetwater Creek Water Supply Watersheds. However, the Part 5 Criteria do place restrictions on hazardous waste handling, storage and disposal within seven miles upstream of a public water supply intake. This project is within seven miles upstream of the City of East Point Intake on Sweetwater Creek. The proposed site plan shows an oil containment area just outside the stream buffers shown on the plan. As specified in the Part 5 Criteria, if this facility is determined to handle hazardous materials of the types and amounts determined by Georgia DNR, its operation will need to be on impermeable surfaces having spill and leak collection systems as prescribed by Georgia DNR. This is in addition to any local, state or federal requirements.

This project is not in the City of East Point's Sparks Reservoir watershed, which is a small water supply watershed formed by the basin of a tributary to Sweetwater Creek and receives no direct flow from Sweetwater Creek or the rest of the Sweetwater watershed.

**Stream Buffers**

The USGS coverage for the project area and the submitted site plan both show two blue-line branches of an unnamed tributary to Peachtree Creek with headwaters starting on the western side of the project property and flowing off the property to the northwest. The project site is within the Douglas County Sweetwater Creek/ East Point Intake Basin subwatershed, in which the County requires a 150-foot impervious surface setback and a 100-foot undisturbed buffer on all streams. The submitted site plan shows both that buffer and setback as well as the 25-foot State Sediment and Erosion Control Buffer on both streams. The site plan also shows two other buffers: a 112.5-foot impervious setback and a 75-foot undisturbed buffer, both with notes stating that they are 25% reductions through administrative variances.

Which buffers apply will depend on whether the variances are granted by the County.

The submitted site plan shows intrusions into the setbacks and buffers on both streams. On the northernmost stream, a portion of a parking area adjacent to Proposed Building A and a portion of a proposed stormwater management area intrude into the 150-foot setback. If a setback variance is granted by the County, these areas will not be buffer intrusions. If the setback variance is not granted, the intrusions may require variances from the County.

On the southern stream, portion of the proposed substation and a proposed retaining wall intrude on the 150-foot and 112.5-foot setbacks and the 100-foot undisturbed buffer, and the retaining wall nearly touches the 75-foot undisturbed buffer. These intrusions may require variances from Douglas County.

Any unmapped streams on the property may also be subject to the County buffer requirements. Any unmapped State waters identified on the property may also be subject to the State 25-foot Sediment and Erosion Control buffer.

#### **Water Supply and Wastewater**

Given the large water demands associated with data centers, we recommend working with the Douglasville-Douglas County Water Authority to ensure that adequate water supply, wastewater capacity, and infrastructure are available.

#### **Stormwater/Water Quality**

The project should adequately address the impacts of the proposed development on stormwater runoff and downstream water quality.

During the planning phase, the stormwater management system (system) should meet the requirements of the local jurisdiction's post-construction (or post-development) stormwater management ordinance. The system should be designed to prevent increased flood damage, streambank channel erosion, habitat degradation and water quality degradation, and enhance and promote the public health, safety and general welfare. The system design should also be in accordance with the applicable sections of the Georgia Stormwater Management Manual ([www.georgiastormwater.com](http://www.georgiastormwater.com)) such as design standards, calculations, formulas, and methods. Where possible, the project should use stormwater better site design practices included in the Georgia Stormwater Management Manual, Volume 2, Section 2.3.

During construction, the project should conform to the relevant state and federal erosion and sedimentation control requirements.

## Development of Regional Impact Assessment of Consistency with the Regional Transportation Plan

### DRI INFORMATION

**DRI Number** #4087  
**DRI Title** Lithia Springs Data Center  
**County** Douglas County  
**City (if applicable)**  
**Address / Location** Intersection of Riverside Parkway and Roberts Road

**Proposed Development Type:**

A DRI review of a project to construct two three-story data center buildings with a total square footage of 878,886 SF along with ancillary support elements on a 44-acre currently wooded site off of Factory Shoals Road in Douglas County.

**Build Out: 2026**

**Review Process** ☐ EXPEDITED  
☒ NON-EXPEDITED

### REVIEW INFORMATION

**Prepared by** ARC Transportation Access and Mobility Division  
**Staff Lead** Reginald James  
**Copied** N/A  
**Date** December 4, 2023

### TRAFFIC STUDY

**Prepared by** NV5 Engineers and Consultants, Inc.  
**Date** November 8, 2023

## **REGIONAL TRANSPORTATION PLAN PROJECTS**

**01. Did the traffic analysis incorporate all projects contained in the current version of the fiscally constrained RTP which are within the study area or along major transportation corridors connecting the study area with adjacent jurisdictions?**

☒ YES *(provide the regional plan referenced and the page number of the traffic study where relevant projects are identified)*

On page 5 of the traffic study.

☐ NO *(provide comments below)*

[Click here to provide comments.](#)

## **REGIONAL NETWORKS**

**02. Will the development site be directly served by any roadways identified as Regional Thoroughfares?**

A Regional Thoroughfare is a major transportation corridor that serves multiple ways of traveling, including walking, bicycling, driving, and riding transit. It connects people and goods to important places in metropolitan Atlanta. A Regional Thoroughfare's operations should be managed through application of special traffic control strategies and suitable land development guidelines in order to maintain travel efficiency, reliability, and safety for all users. In light of the special function that Regional Thoroughfares serve in supporting cross-regional and interjurisdictional mobility and access, the network receives priority consideration for infrastructure investment in the Metro Atlanta region. Any access points between the development and a Regional Thoroughfare, combined with the development's on-site circulation patterns, must be designed with the goal of preserving the highest possible level of capacity and safety for all users of the roadway.

☒ NO

☐ YES *(identify the roadways and existing/proposed access points)*

No access to the site is provided via a roadway identified as a Regional Thoroughfare.

**03. Will the development site be directly served by any roadways identified as Regional Truck Routes?**

A Regional Truck Route is a freeway, state route or other roadway which serves as a critical link for the movement of goods to, from and within the Region by connecting airports, intermodal/multimodal facilities, distribution and warehousing centers and manufacturing clusters with the rest of the state and nation. These facilities often serve a key mobility and access function for other users as well, including drivers, bicyclists, pedestrians and transit users. A Regional Truck Route's operations should be managed through application of special traffic control strategies and suitable land development guidelines in order to maintain travel efficiency, reliability, and safety for all users. In light of the special function that Regional Truck Routes serve in supporting cross-regional and interjurisdictional mobility and access, the network receives priority consideration for infrastructure investment in the Metro Atlanta region. Any access points between the development and a Regional Truck Route, combined with the development's on-site circulation patterns, must be designed with the goal of preserving the highest possible level of capacity and safety for all users of the roadway.

☒ NO

☐ YES (*identify the roadways and existing/proposed access points*)

No access to the site is provided via a roadway identified as a Regional Truck Route.

**04. If the development site is within one mile of an existing rail service, provide information on accessibility conditions.**

*Access between major developments and transit services provide options for people who cannot or prefer not to drive, expand economic opportunities by better connecting people and jobs, and can help reduce congestion. If a transit service is available nearby, but walking or bicycling between the development site and the nearest station is a challenge, the applicable local government(s) is encouraged to make the route a funding priority for future walking and bicycling infrastructure improvements.*

☒ NOT APPLICABLE (*nearest station more than one mile away*)

☐ RAIL SERVICE WITHIN ONE MILE (*provide additional information below*)

Operator / Rail Line

Nearest Station

[Click here to enter name of operator and rail line](#)

Distance\*

☐ Within or adjacent to the development site (0.10 mile or less)

☐ 0.10 to 0.50 mile

☐ 0.50 to 1.00 mile

Walking Access\*

☐ Sidewalks and crosswalks provide sufficient connectivity

☐ Sidewalk and crosswalk network is incomplete

- ☐ Not applicable (*accessing the site by walking is not consistent with the type of development proposed*)

[Click here to provide comments.](#)

Bicycling Access\*

- ☐ Dedicated paths, lanes or cycle tracks provide sufficient connectivity
- ☐ Low volume and/or low speed streets provide connectivity
- ☐ Route follows high volume and/or high speed streets
- ☐ Not applicable (*accessing the site by bicycling is not consistent with the type of development proposed*)

Transit Connectivity

- ☐ Fixed route transit agency bus service available to rail station
- ☐ Private shuttle or circulator available to rail station
- ☐ No services available to rail station
- ☐ Not applicable (*accessing the site by transit is not consistent with the type of development proposed*)

[Click here to provide comments.](#)

*\* Following the most direct feasible walking or bicycling route to the nearest point on the development site*



**05. If there is currently no rail transit service within one mile of the development site, is nearby rail service planned in the fiscally constrained RTP?**

*Access between major developments and transit services provide options for people who cannot or prefer not to drive, expand economic opportunities by better connecting people and jobs, and can help reduce traffic congestion. If a transit agency operates within the jurisdiction and expansion plans are being considered in the general vicinity of the development site, the agency should give consideration to how the site can be best served during the evaluation of alignments and station locations. Proactive negotiations with the development team and local government(s) are encouraged to determine whether right-of-way within the site should be identified and protected for potential future service. If direct service to the site is not feasible or cost effective, the transit agency and local government(s) are encouraged to ensure good walking and bicycling access accessibility is provided between the development and the future rail line. These improvements should be considered fundamental components of the overall transit expansion project, with improvements completed concurrent with or prior to the transit service being brought online.*

- ☐ NOT APPLICABLE (rail service already exists)
- ☐ NOT APPLICABLE (accessing the site by transit is not consistent with the type of development proposed)
- ☒ NO (no plans exist to provide rail service in the general vicinity)
- ☐ YES (provide additional information on the timeframe of the expansion project below)
  - ☐ CST planned within TIP period
  - ☐ CST planned within first portion of long range period
  - ☐ CST planned near end of plan horizon

[Click here to provide comments.](#)

**06. If the development site is within one mile of fixed route bus services (including any privately operated shuttles or circulators open to the general public), provide information on walking and bicycling accessibility conditions.**

*Access between major developments and transit services provide options for people who cannot or prefer not to drive, expand economic opportunities by better connecting people and jobs, and can help reduce congestion. If a transit service is available nearby, but walking or bicycling between the development site and the nearest station is a challenge, the applicable local government(s) is encouraged to make the connection a funding priority for future walking and bicycling infrastructure improvements.*

☐ NOT APPLICABLE (nearest bus, shuttle or circulator stop more than one mile away)

☒ SERVICE WITHIN ONE MILE (provide additional information below)

Operator(s)                      Connect Douglas

Bus Route(s)                    Route 30

Distance\*                      ☐ Within or adjacent to the development site (0.10 mile or less)

☒ 0.10 to 0.50 mile

☐ 0.50 to 1.00 mile

Walking Access\*              ☐ Sidewalks and crosswalks provide sufficient connectivity

☒ Sidewalk and crosswalk network is incomplete

☐ Not applicable (accessing the site by walking is not consistent with the type of development proposed)

[Click here to provide comments.](#)

Bicycling Access\*              ☒ Dedicated paths, lanes or cycle tracks provide sufficient connectivity

☐ Low volume and/or low speed streets provide sufficient connectivity

☐ Route uses high volume and/or high speed streets

☐ Not applicable (accessing the site by bicycling is not consistent with the type of development proposed)

\* Following the most direct feasible walking or bicycling route to the nearest point on the development site

**07. Does a transit agency which provides rail and/or fixed route bus service operate anywhere within the jurisdiction in which the development site is located?**

*Access between major developments and transit services provide options for people who cannot or prefer not to drive, expand economic opportunities by better connecting people and jobs, and can help reduce traffic congestion. If a transit agency operates within the jurisdiction and a comprehensive operations plan update is undertaken, the agency should give consideration to serving the site during the evaluation of future routes, bus stops and transfer facilities. If the nature of the development is amenable to access by transit, walking or bicycling, but direct service to the site is not feasible or cost effective, the transit agency and local government(s) should ensure good walking and bicycling access accessibility is provided between the development and any routes within a one mile radius. The applicable local government(s) is encouraged to make these connections a funding priority for future walking and bicycling infrastructure improvements.*

☐ NO

☒ YES

Connect Douglas

**08. If the development site is within one mile of an existing multi-use path or trail, provide information on accessibility conditions.**

*Access between major developments and walking/bicycling facilities provide options for people who cannot or prefer not to drive, expand economic opportunities by better connecting people and jobs, and can help reduce traffic congestion. If connectivity with a regionally significant path or trail is available nearby, but walking or bicycling between the development site and those facilities is a challenge, the applicable local government(s) is encouraged to make the route a funding priority for future walking and bicycling infrastructure improvements.*

☐ NOT APPLICABLE (nearest path or trail more than one mile away)

☒ YES (provide additional information below)

Name of facility      Chattahoochee Hill Country Regional Greenway Trail

Distance      ☐ Within or adjacent to development site (0.10 mile or less)

☐ 0.15 to 0.50 mile

☒ 0.50 to 1.00 mile

Walking Access\*      ☐ Sidewalks and crosswalks provide connectivity

☒ Sidewalk and crosswalk network is incomplete

☐ Not applicable (accessing the site by walking is not consistent with the type of development proposed)

Bicycling Access\*      ☐ Dedicated lanes or cycle tracks provide connectivity

☒ Low volume and/or low speed streets provide connectivity

☐ Route uses high volume and/or high speed streets

☐ Not applicable (accessing the site by bicycling is not consistent with the type of development proposed)

\* Following the most direct feasible walking or bicycling route to the nearest point on the development site

## **OTHER TRANSPORTATION DESIGN CONSIDERATIONS**

### **09. Does the site plan provide for the construction of publicly accessible local road or drive aisle connections with adjacent parcels?**

*The ability for drivers and bus routes to move between developments without using the adjacent arterial or collector roadway networks can save time and reduce congestion. Such opportunities should be considered and proactively incorporated into development site plans whenever possible.*

- ☐ YES (connections to adjacent parcels are planned as part of the development)
- ☐ YES (stub outs will make future connections possible when adjacent parcels redevelop)
- ☒ NO (the site plan precludes future connections with adjacent parcels when they redevelop)
- ☐ OTHER ( Please explain)

### **10. Does the site plan enable pedestrians and bicyclists to move between destinations within the development site safely and conveniently?**

*The ability for walkers and bicyclists to move within the site safely and conveniently reduces reliance on vehicular trips, which has congestion reduction and health benefits. Development site plans should incorporate well designed and direct sidewalk connections between all key destinations. To the extent practical, bicycle lanes or multiuse paths are encouraged for large acreage sites and where high volumes of bicyclists and pedestrians are possible.*

- ☐ YES (sidewalks provided on all key walking routes and both sides of roads whenever practical and bicyclists should have no major issues navigating the street network)
- ☐ PARTIAL (some walking and bicycling facilities are provided, but connections are not comprehensive and/or direct)
- ☐ NO (walking and bicycling facilities within the site are limited or nonexistent)
- ☒ NOT APPLICABLE (the nature of the development does not lend itself to internal walking and bicycling trips)
- ☐ OTHER ( Please explain)

### **11. Does the site plan provide the ability to construct publicly accessible bicycling and walking connections with adjacent parcels which may be redeveloped in the future?**

*The ability for walkers and bicyclists to move between developments safely and conveniently reduces reliance on vehicular trips, which has congestion reduction and health benefits. Such opportunities should be considered and proactively incorporated into development site plans whenever possible.*

- ☐ YES (connections to adjacent parcels are planned as part of the development)
- ☐ YES (stub outs will make future connections possible when adjacent parcels redevelop)
- ☒ NO (the development site plan does not enable walking or bicycling to/from adjacent parcels)
- ☐ NO (the site plan precludes future connections with adjacent parcels when they redevelop)
- ☐ NOT APPLICABLE (adjacent parcels are not likely to develop or redevelop in the near future)
- ☐ NOT APPLICABLE (the nature of the development or adjacent parcels does not lend itself to interparcel walking and bicycling trips)

**12. Does the site plan effectively manage truck movements and separate them, to the extent possible, from the flow of pedestrians, bicyclists and motorists both within the site and on the surrounding road network?**

*The ability for delivery and service vehicles to efficiently enter and exit major developments is often key to their economic success. So is the ability of visitors and customers being able to move around safely and pleasantly within the site. To the extent practical, truck movements should be segregated by minimizing the number of conflict points with publicly accessible internal roadways, sidewalks, paths and other facilities.*

- ☒ YES (truck routes to serve destinations within the site are clearly delineated, provide ample space for queuing and turning around, and are separated from other users to the extent practical)
- ☐ PARTIAL (while one or more truck routes are also used by motorists and/or interface with primary walking and bicycling routes, the site plan mitigates the potential for conflict adequately)
- ☐ NO (one or more truck routes serving the site conflict directly with routes likely to be used heavily by pedestrians, bicyclists and/or motorists)
- ☐ NOT APPLICABLE (the nature of the development will not generate a wide variety of users and/or very low truck volumes, so the potential for conflict is negligible)

## **RECOMMENDATIONS**

**13. Do the transportation network recommendations outlined in the traffic study appear to be feasible from a constructability standpoint?**

- ☐ UNKNOWN (additional study is necessary)
- ☒ YES (based on information made available through the review process; does not represent a thorough engineering / financial analysis)

☐ NO *(see comments below)*

[Click here to enter text.](#)

**14. Is ARC aware of any issues with the development proposal which may result in it being opposed by one or more local governments, agencies or stakeholder groups?**

☒ NO *(based on information shared with ARC staff prior to or during the review process; does not reflect the outcome of an extensive stakeholder engagement process)*

☐ YES *(see comments below)*

[Click here to enter text.](#)

**15. ARC offers the following additional comments for consideration by the development team and/or the applicable local government(s):**

None at this time.

**From:** [Philip Shafer](#)  
**To:** [Donald Shockey](#); [Brett Buckland](#); [Brittany Williams](#)  
**Subject:** RE: 2023 Lithia Springs Data Center DRI 4087 - Preliminary Report & Comments Request  
**Date:** Tuesday, November 28, 2023 1:47:32 PM  
**Attachments:** [image001.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[Z2023 71\\_S2023 72\\_stack\\_staff\\_report .pdf](#)

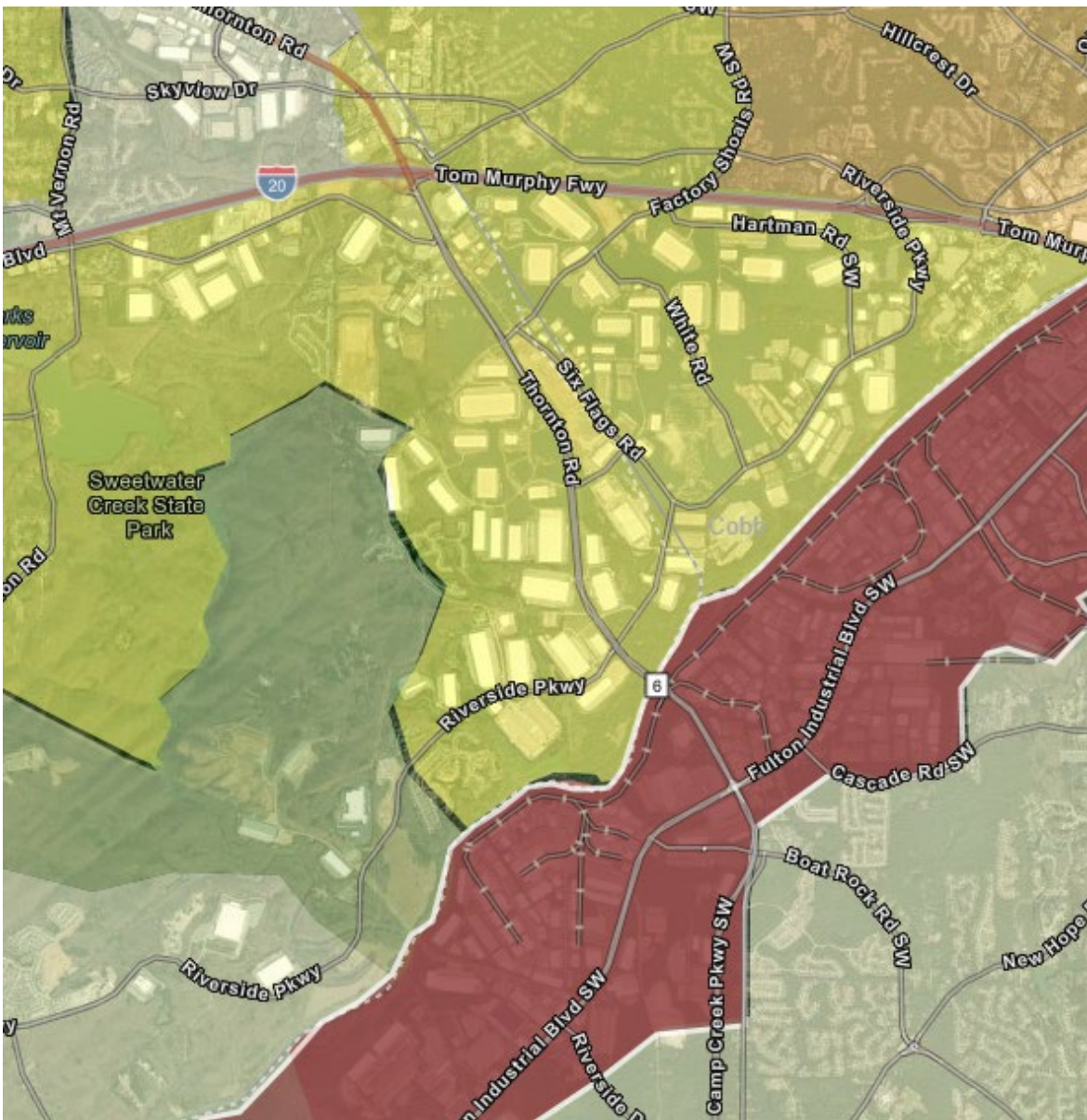
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Hello Donald,

I will go ahead and submit our initial staff report for the rezoning case for this DRI 4087 as the County's comments. Also, I will add the following comments to your initial assessment based on the unified growth policy maps. I believe the ARC is working off land use map areas that need updates and should reflect the same colors along our Douglas County Thornton/Factory Shoals corridors as the deep red colors along the east side of the river indicating "regional center" activity areas. Given the millions of square feet of industrial and commercial uses along the whole Thornton corridor, it surprises me how out of date the regional "unified Growth Policy" maps actually are with the "established suburbs" designation on land that has only had industrial/heavy commercial development for many years now. Here's a copy of what ARC works off of. I don't know the process for amending this map but the amount of residential development in the aerial below the yellow map colors running up Thornton is virtually non-existent, and since that's what's on the books, so that's what you have to identify, which is what you are referring to in the initial comments. Given the out-of-date nature of the regional depictions, we don't typically refer to this info unless a DRI is involved and then only to comment on how out of sync the maps are with our County data and ARC approved county plans.

ARC regional map showing "established suburbs" category for the site:

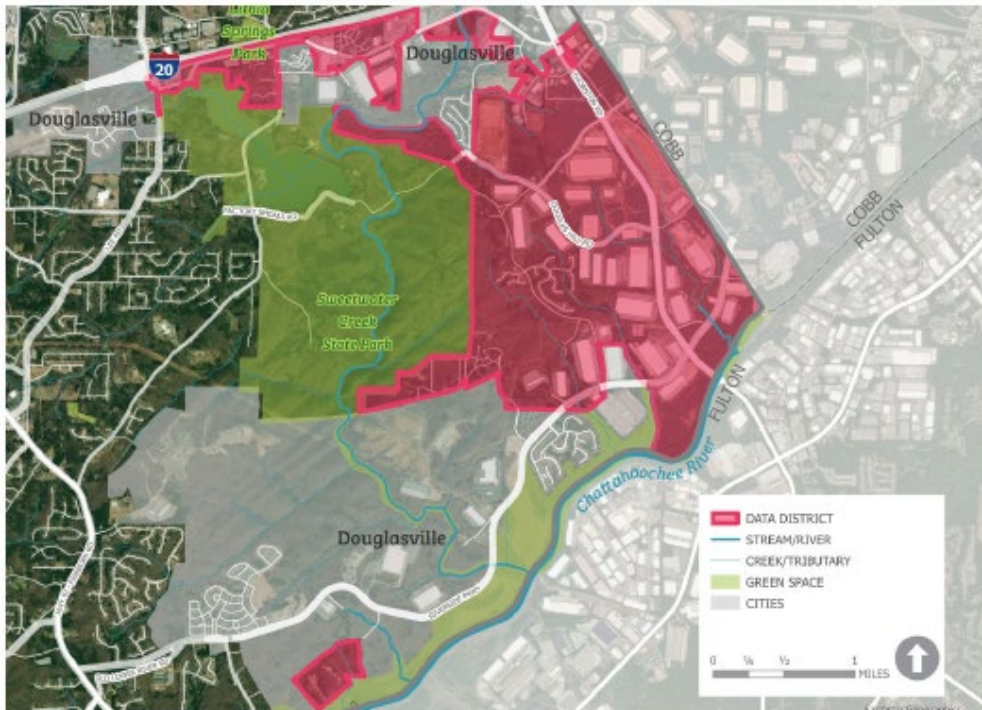




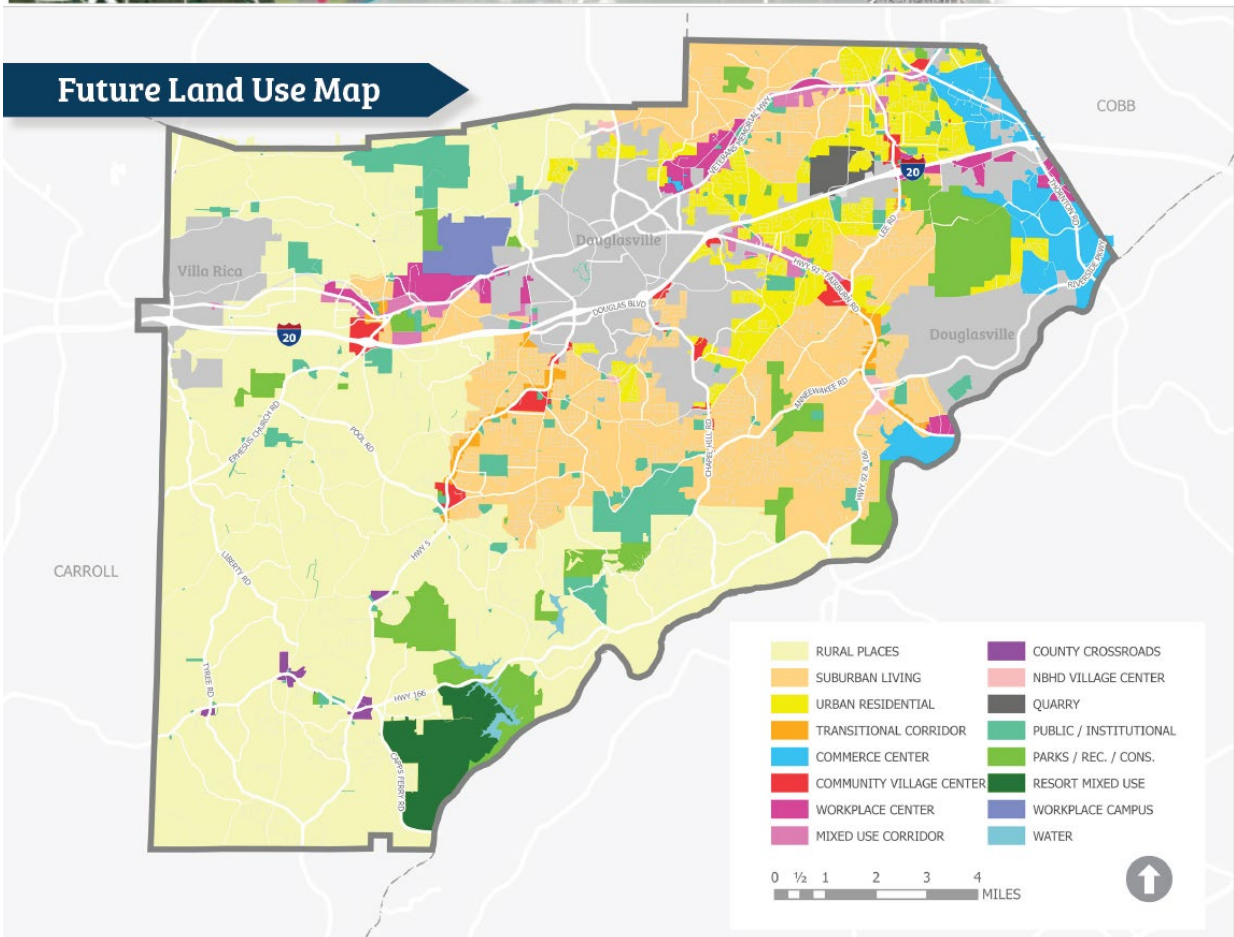
Here's our 2023 Douglas County updated comp plan depiction of this area as within our new "Data District" and also being within the Future Land Use Map designation of our Commerce Center Area for zoning purposes.



## Data District



## Future Land Use Map



**DOUGLAS COUNTY PLANNING AND ZONING DEPARTMENT  
STAFF REVIEW AND RECOMMENDATIONS  
REZONING**

<b>Application Number</b>	<b>Z2023-71 S2023-72</b>
<b>Applicant</b>	<b>SI ATL02A, LLC</b>
<b>Property Owner</b>	<b>SI ATL02A, LLC</b>
<b>Location</b>	800 and 808 Factory Shoals Road within Land Lot 795, District 18, Section 2 Parcel 6 and Land Lot 772, District 18, Section 2 Parcel 4
<b>Current Zoning</b>	LI-R, Light Industrial-Restricted and R-A, Residential Agricultural
<b>Future Land Use</b>	Commerce Center
<b>Future Land Use Map Amendment</b>	N/A
<b>Request</b>	LI-R, Light Industrial-Restricted across the additional tract and a Special Use Permit
<b>Associated Special Use Permit</b>	SUP is for a Power substation
<b>Size</b>	44.3 acres
<b>Commissioner District</b>	2
<b>Proposed Use</b>	Power substation to serve a data center
<b>Recommendation</b>	Approval
<b>Hearing Date</b>	December 5, 2023

**Existing Conditions**

- The property is located on the west side of Factory Shoals Road between Thornton Road and Douglas Hill Road.
- The larger parcel of this project is mostly wooded and undeveloped with the parcel being added by this rezoning being developed with residential homes and accessory structures.
- The majority of the site (38.8 acres) was the subject of rezoning to LI-R approved under case Z2018-03 on 2/6/18. The remnant residentially zoned property contains single family dwellings and accessory buildings.

**Applicants Proposal**

The applicant is proposing to rezone the residential tract and approval of a special use permit to install a user-specific power distribution and transformer substation facility to serve the data center buildings being built on the site.

**Community Information Meeting**

The Department held a community information meeting on November 14, 2023. No neighbors or members of the general public attended to ask questions or raise any issues for this application.

**Planning Comments/Concerns**

Under Article 2 of the Development Code, power substations on privately owned land, built privately, even if operated by the Georgia Power

Company or Greystone Power, require a special use approval. The data center warehousing use is classified as a use-by-right and will only require review and authorization by the Development Review Committee given the appropriate zoning is in place. The DRC reviewed this proposal initially on October 25, 2023 and provided comments to the applicant. The included agency impact statements reflect the comments given to the applicant at this meeting.

### **Development of Regional Impact Review**

The scale of the proposal exceeded the threshold (500,000 square feet) for industrial developments that triggered a Development of Regional Impact (DRI) required review procedure managed by the Atlanta Regional Commission (ARC) and the Georgia Regional Transportation Authority (GRTA). The project submitted the required documentation under cover of Lithia Springs Data Center (DRI 4087) in October of 2023.

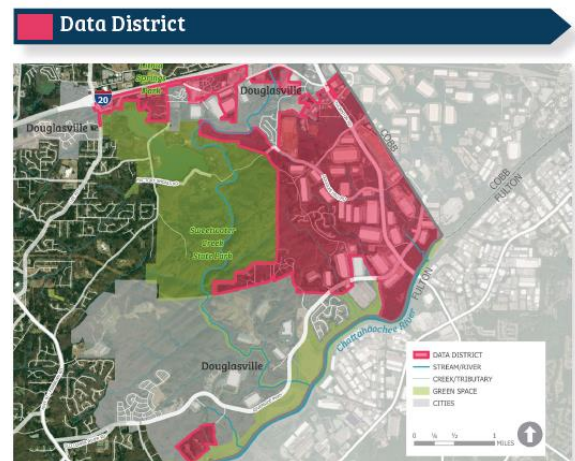
The project was reviewed according to the requirements of the ARC and GRTA standards and a final report was anticipated to be issued for the project on November 25, 2023. The issuance of this final report allows the County to proceed with the rezoning application.

Should the report not be available for the time of the public meeting, the Commissioners would need postpone the voting until the next regular P&Z meeting in January (January 9, 2024).

### **Comprehensive Plan Updated 2023**

The proposal falls within the Data Center Character Area of the newly

adopted Comprehensive Plan approved this year.



The Plan outlines the compatible zone districts for any future rezoning requests, which include the LI and LI-R, Light Industrial Districts. The applicant is seeking to add the small residential property into the overall previously zoned industrial acreage as LI-R zoning.

The Future Land Use Map already depicts the property as within the Commerce Center designation, so no amendment is required.

***Vision: Center for light industrial and technology-oriented employment***

#### ***Future Land Use Changes Can Be:***

- Commerce Center\*
- Workplace Center
- Urban Residential (limited)
- Transportation/ Communication/ Utilities
- Parks/ Recreation/ Conservation

\* Predominant Land Use(s)

#### ***Parks, Open Space + Trails Guidance***

Because of limited residential development, the Data District does not need neighborhood and community parks, but private, campus-like greenspaces and linear parks/trails are appropriate. Trails between Chattahoochee Riverlands to Sweetwater Creek State Park are critical connections in the County's high-level trails framework. The table below describes the level of service for future trails in the area:

Parks, Open Space, + Trails Guidance	
Type	Access (Level of Service)
Trails	1/2 Mile with Parking

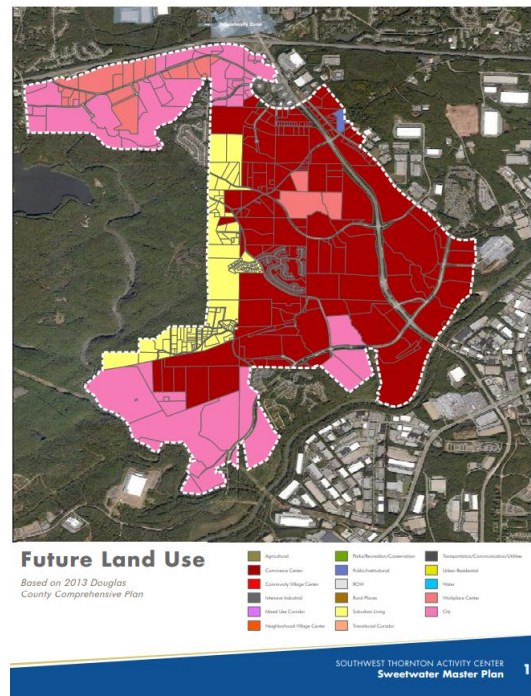


## Southwest Thornton Activity Center Sweetwater Master Plan

The Southwest Thornton Activity Center Sweetwater Master Plan document outlines a plan and process to guide development in the area to support a complete diverse and dynamic daytime and evening activity center

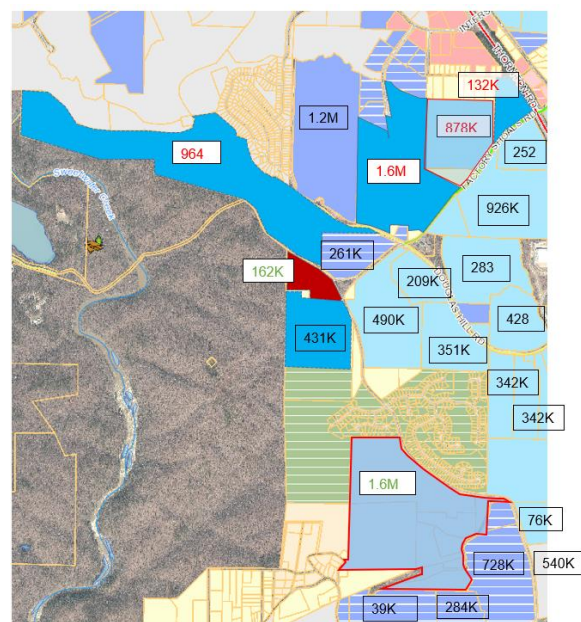


The Future Land Uses were depicted on the following map with residential adjoining the State Park and the rest being Commerce Center. The portion of the project not within the study area is depicted as “Urban Residential” in the official County Future Land Use Map as are the yellow tracts depicted on the map below.



## Existing Industrial Projects and Proposed Industrial Projects

Staff reviewed the as-built square footages of the various projects that have been built throughout the County and provides this update to the amount of industrial construction as well as what is in the pipeline for the Douglas Hill area.



Warehouse Development in this visible portion of the Factory Shoals/Douglas Hill and Rock House Road area. Reviewing the quadrant for rooftops, in this specific industrial node the total built square footage (in black numbers) amounts to around 7.1 million square

feet (both City and County). This does not include about 2.6 million square feet approved and under construction (red numbers) nor the anticipated additional projects seeking approval of approximately 1.7 million square feet.

## **SUMMARY OF IMPACTS/CONCERNS**

### **Douglas County DOT Assessment**

This site is located at approximately 800 & 808 Factory Shoals Rd. Factory Shoals Rd is a Minor Arterial roadway on the County's Transportation and Thoroughfare Plan Map, with a posted speed limit of 35 MPH. The Right-Of-Way width along Factory Shoals Rd varies per the County's GIS map.

Douglas County Department of Transportation offers the following recommendations:

1. All proposed driveways to Factory Shoals Rd shall be serviced by a deceleration lane designed to County specifications and shall be positioned to meet or exceed Intersection Sight Distance for a 35-mph roadway in each direction.
2. Provide sidewalk, curb and gutter and underground drainage along the entire property frontage of Factory Shoals Rd.
3. The entire property frontage along Factory Shoals Rd shall be improved to provide a 3-lane section roadway of Factory Shoals Rd, transitioning into a 2-

lane section beyond property frontage limits.

4. Additional Right-Of-Way is required along the entire property frontage of Factory Shoals Rd to comply with minimum Right-Of-Way width of a Minor Arterial roadway. Therefore, a minimum of 50 feet from the existing roadway centerline shall be dedicated to Douglas County.
5. Provide streetlights along the entire property frontage of Factory Shoals Rd.

### **Environmental Health**

Public water is available.

Public sewer will be required.

The existing home is on septic system and those will need proper decommissioning with notification sent to the Douglas County Health Department.

DOUGLAS COUNTY BOARD OF HEALTH/ON-SITE SEWAGE MANAGEMENT SYSTEM RECORD

Property Location: 808 Factory Shoals Rd Date: 6-6-00

Address: \_\_\_\_\_ Lot #: \_\_\_\_\_ Blk: 1966

Land Lot: 795 Dist: 18th 2nd Septic Tank Permit: 21637

Owner: Dawson Childress Jr. Building Permit: \_\_\_\_\_

Septic Tank Contractor: Septic Inc. Sketch of System: \_\_\_\_\_

Section A - General:

1. Type Water Supply: Public
2. Name or Repair System: Repair
3. Type of Facility: Residence
4. No. of Bedrooms: \_\_\_\_\_
5. Lot Size: \_\_\_\_\_
6. Lot Depth (AVG): \_\_\_\_\_
7. Lot Width (AVG): \_\_\_\_\_
8. Building Line (FL): \_\_\_\_\_

Section B - Septic Tank:

1. Septic Tank Size (Gal.): 1150
2. Dosing Tank Capacity (Gal.): \_\_\_\_\_
3. Grease Trap Capacity (Gal.): \_\_\_\_\_
4. Field Layout Method: Chamber

Section C - Distance Measurement:

1. Building Sewer: \_\_\_\_\_
2. Length each Trench (ft): 7
3. Total Linear Feet: 100'
4. Trench Width (AVG): 36"
5. Trench Depth (AVG): 3.2'
6. Aggregate Depth (AVG): 2.4'
7. Distance from Bldg. Foundation: 50'
8. Nearest Property Line: 6.6'
9. Distance Nearest Property Line: 1/4 mile
10. Distance Trench from Well: 15'
11. Distance Septic Tank from Well: 50'

System: Approved Code Violation: \_\_\_\_\_

Inspected by: Shannon Stewart Contractor's Signature: \_\_\_\_\_ Date: 6/7/00

Repair Permit Number: 61031 Date of Issue: 6/6/00

Approved by (Board of Health Representative): \_\_\_\_\_ Title: Lee Heston Co. Mgr

approximately 8-10 minutes depending on the type of responding fire unit required, with station 1 responding. The current Fire Protection Rating is Class 3.

Fire hydrant spacing must not exceed 400 feet intervals and minimum water main size must be 8" providing a minimum of 1,000 gpm flow demand.

### Sheriff's Department

There is adequate patrol presence, and an approximately 15-20-minute response time. With additional growth in the County, it would be anticipated that additional personnel and equipment would be necessary to continue efficient service.

### Tax Assessor's Office

Taxes are paid.

### Engineering/Development Control

The property does not contain floodplain (Zone X).

The property is within the Sparks Reservoir basin.

### Arborist

The property is wooded and partially open around the existing house. There appear to be viable buffers along the perimeter.

### Code Enforcement

There are no citations or summons actions pending.

### Board of Education

No impact identified.

### Water and Sewer Authority

Water service is available. The property has water service available from the 16" main line in the ROW of Factory Shoals Road.

Sewer service is available. The 8" line is about 1,200 feet away to the north. The property is in the Sweetwater Creek WTP service area.

State waters are present on the property and will require a 100-foot undisturbed stream buffer.

Off premise public water and sewer infrastructure improvements will be required for this project.

### Fire Department

The Fire Department states that response time to the site is

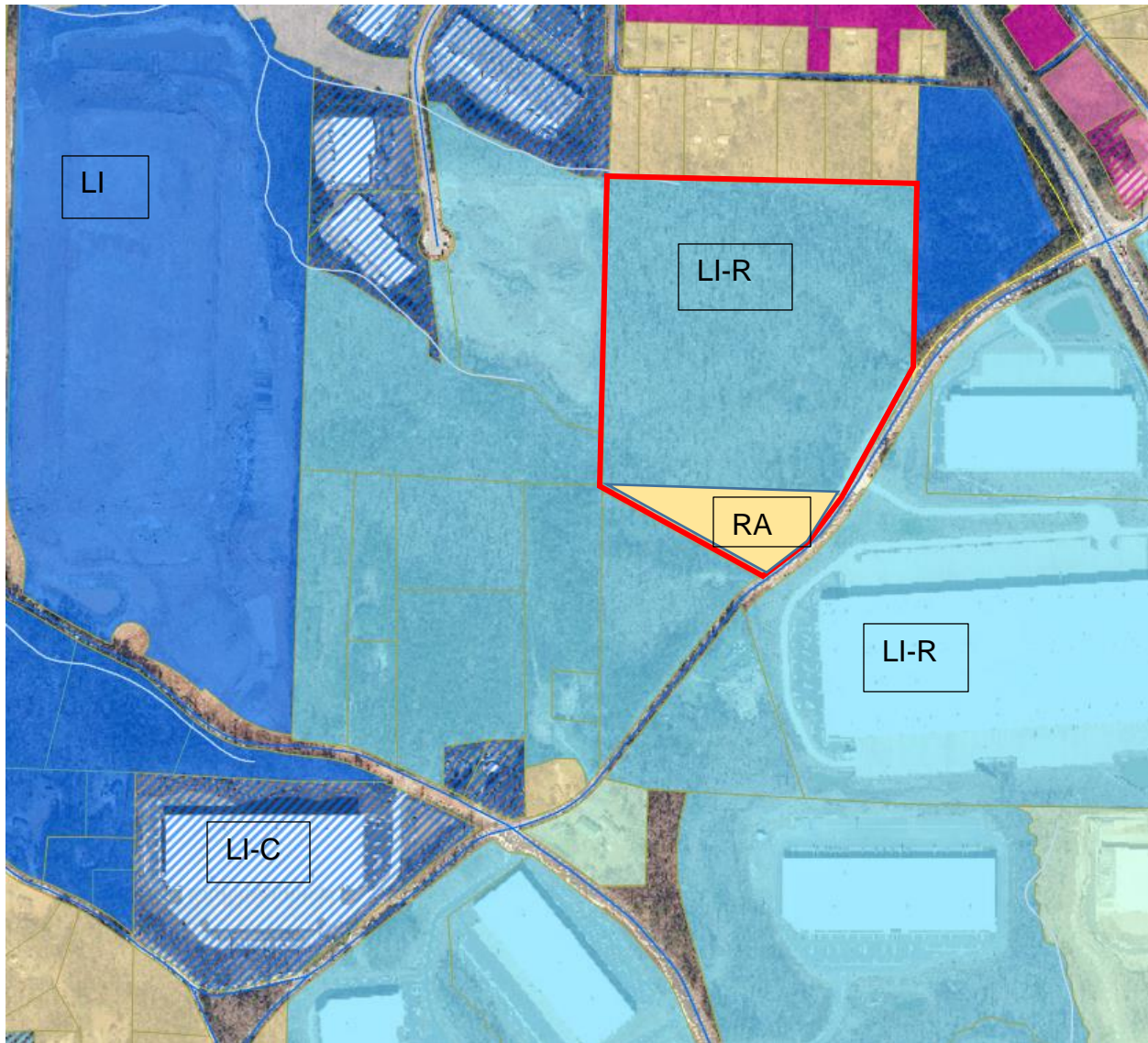
### **Cemetery Commission**

No impacts anticipated; recommend approval.



**Adjacent Land Use and Zonings are:**

Direction	Land Use	Zoning
North	Vacant and residential	R-A, Residential Agricultural
South	Industrial.	LI-R, Light Industrial-Restricted
East	Industrial	LI-Light Industrial and LI-R, Light Industrial-Restricted
West	Industrial.	LI-R, Light Industrial-Restricted



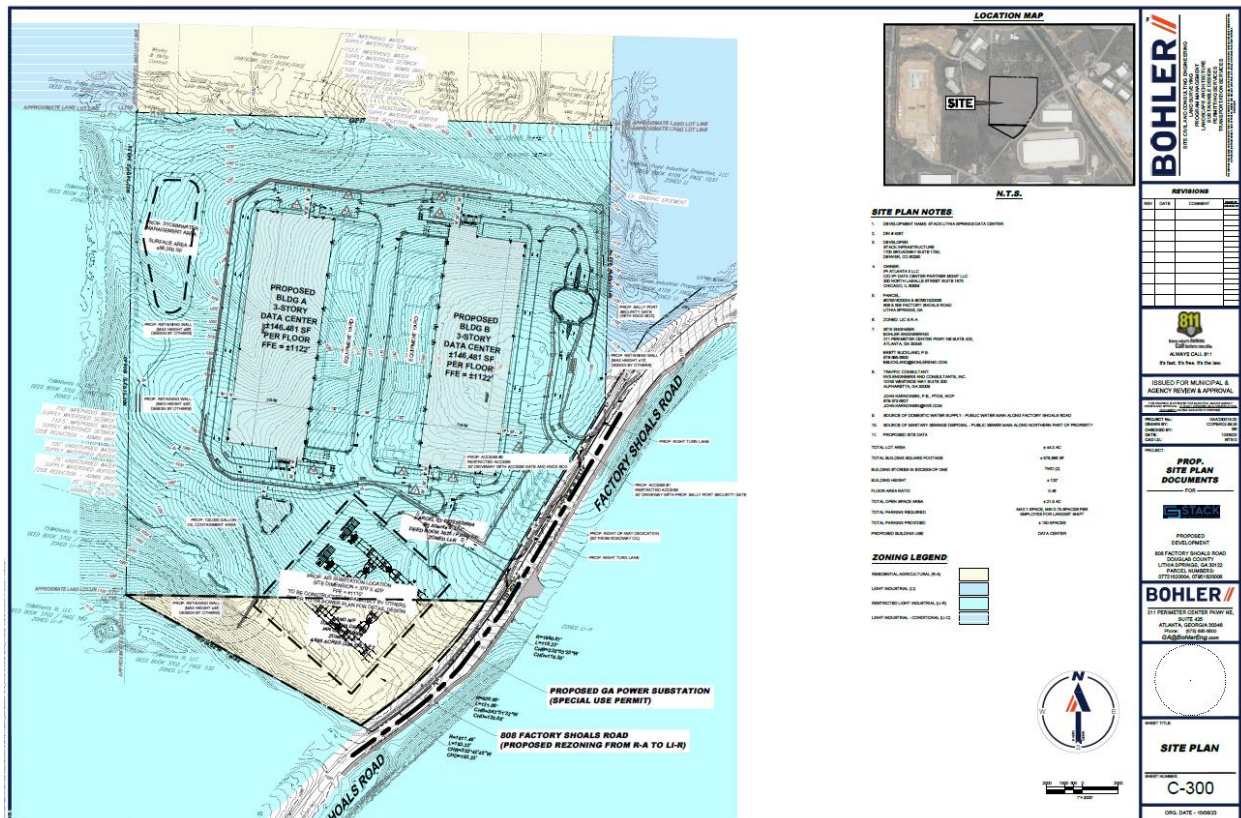
Zoning Map for subject property and properties surrounding



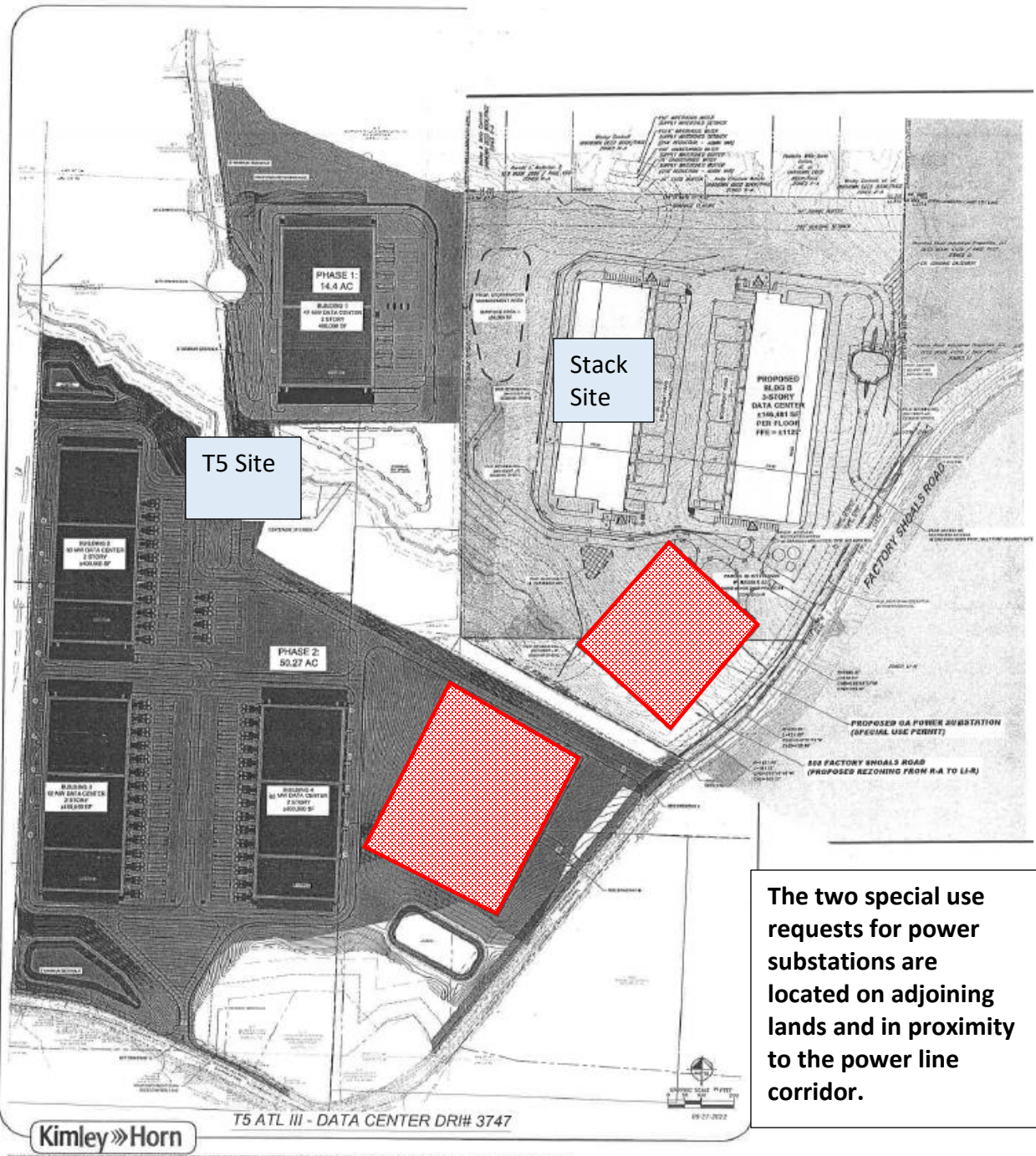


Parcel Map Aerial View with surrounding uses

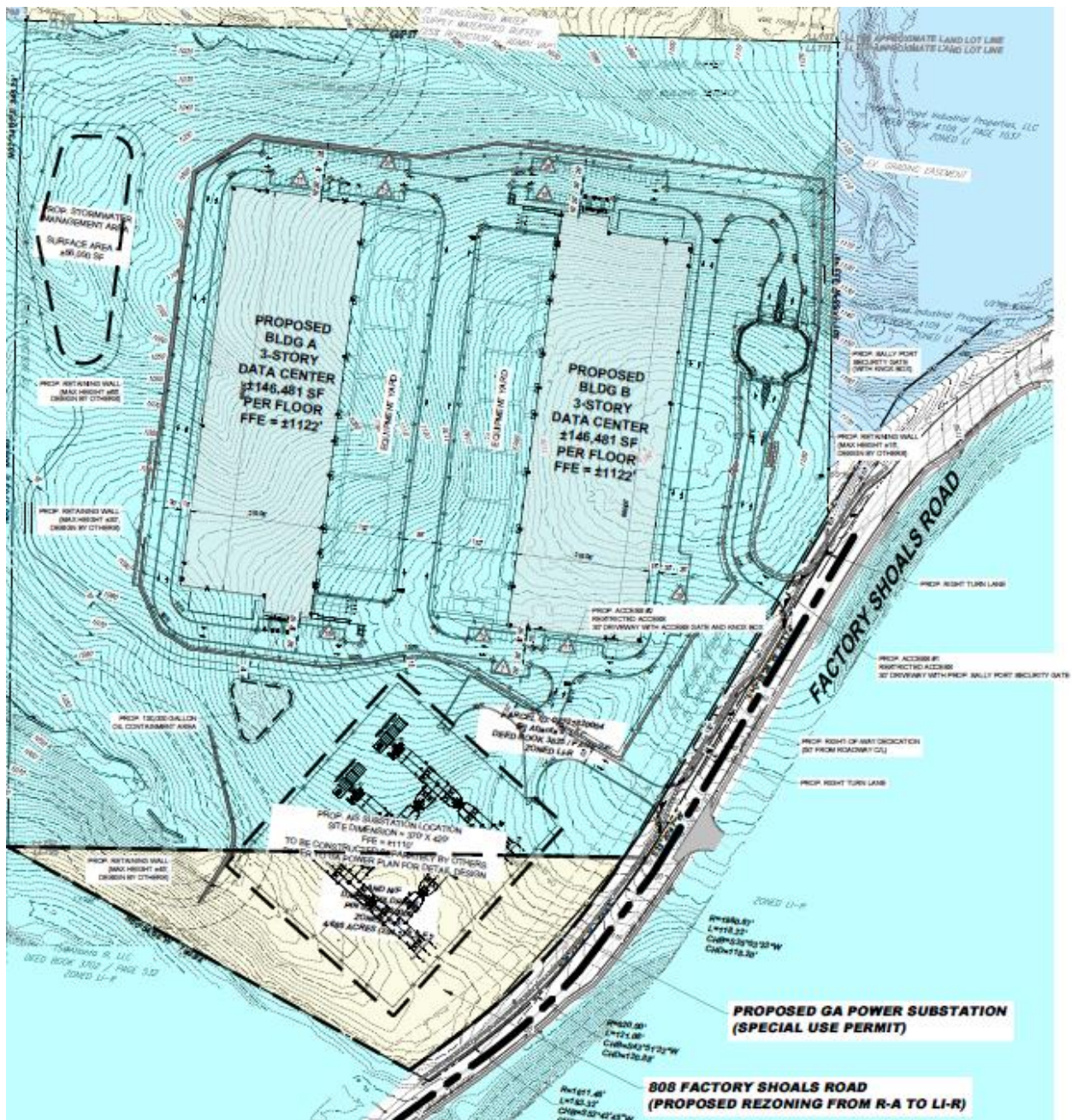




Survey of the properties.







Site Development Plans reviewed by DRC



## Examples of Infrastructure Serving the Data Center:



Water tank reservoir for cooling the servers and buildings.



Typical sub-station serving to distribute power into the data center.

## **Analysis for Rezoning**

Section 1207(a) provides that all amendments to the zoning map shall be viewed in light of the following standards used to interpret the balance between an individual's unrestricted right to the use of his or her property and the public health, safety, morality, or general welfare of the community. These standards shall be printed and copies thereof shall be available for distribution to the general public. Emphasis may be placed on those criteria most applicable to the specific use proposed:

**Factor:**       **(1) Is the proposed use consistent with the stated purpose of the zoning district that is being requested?**

**Analysis:**     The LI Light Industrial District is established to protect and promote a suitable environment for light industrial purposes and uses that require both office and distribution facilities at the same site, as well as related and compatible commercial uses and appropriate accessory uses and including accessibility to major transportation facilities, availability of adequate utilities and other public services, and availability of large quantities of suitable land. Uses compatible with light industrial development are to be encouraged insofar as they are in accordance with comprehensive development plans for the county.

The proposed electrical substation development meets the criteria for this district and is consistent with the purpose and intent of the zone district.

**Supports Requested Use: Yes**

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**Factor:**       **(2) Is the proposed use suitable in view of the zoning and development of adjacent and nearby property?**

**Analysis:**     The proposed use and zoning are generally compatible with the existing industrial uses in the vicinity and may require some appropriate buffering for those residential properties along the northerly property line.

**Supports Requested Use: Yes**

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**Factor:**       **(3) Will the proposed use not adversely affect the existing use, value or usability of adjacent or nearby property?**

**Analysis:**     The adjoining residential properties to the north would be screened by undisturbed wooded buffers. The proposed use at this location, therefor, does have the ability to buffer and mitigate impacts from the proposed use with screening or plantings and/or fencing

meeting the requirements of Article 8 Section 813 zoning buffer standards.

---

**Supports Requested Use: Yes**

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**Factor:** (4) Is the proposed use compatible with the purpose and intent of the Comprehensive Plan?

**Analysis:** The proposed use is consistent with the Comprehensive Future Land Use Plan categorization of this property as within the “Workplace Center” area incorporating a mix of intensely industrial and commercial uses.

---

**Supports Requested Use: Yes**

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**Factor:** (5) Are their substantial reasons why the property cannot or should not be used as currently zoned?

**Analysis:** The current industrial zoning has been in place for several years on the larger tract with development being anticipated. The residentially zoned property has been zoned for many decades and industrial development has taken place around the property. The property owner was able to negotiate with the project developer to sell the residential tract and have that be marked out for the electrical substation area. Having the site plan develop as depicted would provide a significant amount of buffer and screening for the remaining residential properties along Linda Lane adjoining the northerly property line.

---

**Supports Requested Use: Yes**

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**Factor:** (6) Will the proposed use not cause an excessive or burdensome use of public facilities or services, including but not limited to streets, schools, water or sewer utilities, and police or fire protection?

**Analysis:** Industrial uses along Factory Shoals, Douglas Hill and Thornton Roads have been developing for some years, so police and fire protection are in place and adequate to serve the proposed use at this location. Sewer service is approximately 1200 feet away. Schools would have no impacts.

---

**Supports Requested Use: Yes**

---

**Factor:** (7) Is the proposed use supported by new or changing conditions not anticipated by the Comprehensive Plan or reflected in the existing zoning on the property or surrounding properties?

**Analysis:** The Comprehensive Plan anticipated a significant commercial center for this area as the Workplace Center is one of the most intensive character area designations in the Comprehensive Plan. This proposal reflects that pattern and scale of development. The proposed use is a use by review in all zone districts and would be sited within the light industrial designation to allow for the new substation to be established. This will serve the data center previously approved and going through development and building permit review.

**Supports Requested Use: Yes**

---

**Factor:** (8) Does the proposed use reflect a reasonable balance between the promotion of the public health, safety, morality, or general welfare and the right to unrestricted use of property?

**Analysis:** The proposal allows for the construction of an electrical substation to serve the demand of the developing data center use. Significant roadway and water service infrastructure improvements are being required along with the Zoning buffers required to screen the site from neighboring properties. Given these requirements, it would appear to provide a reasonable balance between protecting the public welfare and allowing development of the site.

**Supports Requested Use: Yes**

---

### **ANALYSIS for Special Use Permit**

Section 1207(b) provides that a Special Use otherwise permitted within a zoning district shall be considered to be compatible with other uses permitted in the district, provided that due consideration is given to the 9 objective criteria herein analyzed. Emphasis may be placed on those criteria most applicable to the specific use proposed.

**Factor:** (1) Will the proposed Special Use be consistent with the stated purpose of the zoning district in which it will be located?

**Analysis:** Electrical substation uses are a listed use by review permissible in the LI-R District.

**Supports Requested Use: Yes**

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**Factor:** (2) Will the establishment of the Special Use impede the normal and orderly development of surrounding property for uses predominant in the area?

**Analysis:** The Special Use, and associated property improvements that will occur in conjunction with the request, will continue the current pattern of development seen in the adjoining properties. Much of the surrounding area along Factory Shoals Road is already fully developed with industrial buildings and accessory structures.

**Supports Requested Use: Yes**

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**Factor:** (3) Is the location and character of the proposed Special Use consistent with a desirable pattern of development for the locality in general?

**Analysis:** The existing development pattern within this industrial character area includes numerous examples of buildings serving purposes from storage to active manufacturing uses or distribution uses. The addition of an electrical substation is also a use seen in several of the neighboring development sites given the electrical demands for the occupant business.

**Supports Requested Use: Yes**

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**Factor:** (4) Is or will the type of street providing access to the use be adequate to serve the proposed special use?

**Analysis:** The site is accessed directly from Factory Shoals Road with a number of significant road improvements being required.

**Supports Requested Use: Yes**

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**Factor:** (5) Is or will access into and out of the property be adequate to provide for traffic and pedestrian safety, the anticipated volume of traffic flow, and access by emergency vehicles?

**Analysis:** The site is served by access from Factory Shoals Road with a number of significant road improvements being proposed and required including a second entrance for direct access to the substation.

**Supports Requested Use: Yes**

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**Factor:** (6) Are, or will, public facilities such as schools, water or sewer utilities, and police or fire protection be adequate to serve the Special Use?

**Analysis:** The property is currently served by fire and sheriff protection and will generate no additional burden to the school system or the other public facilities. Sewer service will need to be established and is available. Water service will require additional infrastructure to serve the site and maintain consistent water pressures in this general area for all users.

**Supports Requested Use: Yes**

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**Factor:** (7) Are or will refuse, service, parking, or loading areas on the property be located or screened to protect other properties in the area from such adverse affects as noise, light, glare or odor?

**Analysis:** Any trash loading areas will require screening. Existing trees and shrubs provide some screening along the front and sides of the property and would generally obscure activity from neighboring properties which are zoned industrial as well.

**Supports Requested Use: Yes**

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**Factor:** (8) Will hours and manner of operation of the Special Use have no adverse effects on other properties in the area?

**Analysis:** The proposed substation use will generate virtually no traffic except for repairs or maintenance on a recurring basis. That level of traffic should have no adverse effects on the properties in the area.

**Supports Requested Use: Yes**

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**Factor:** (9) Will the height, size, or location of the buildings or other structures on the property be compatible with the height, size, or location of buildings or other structures on neighboring properties?

**Analysis:** The proposed structure is a common size for substation structures used across the County and would be indistinguishable from any other accessory transformer or switching substation structure in terms of height, size or location within the property.

**Supports Requested Use: Yes**

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## **RECOMMENDATION FOR REZONING**

The Planning Commission and Board of County Commissioners are given the opportunity to consider the compatibility of the use with the surrounding uses, to ensure consistency with the character of the area and to minimize impacts. Section 1207(a), standards for Rezoning consideration, of the Douglas County UDC requires that, before approving an application for a zoning change, the Planning Commission and County Commissioners shall find, based upon evidence and testimony presented at the hearing, the required standards have been met: A zoning change shall be considered to be appropriate provided that due consideration is given to the 8 objective criteria previously analyzed. Emphasis may be placed on those criteria most applicable to the specific zoning proposed.

**Staff RECOMMENDS APPROVAL of this requested rezoning 2023-71 from R-A to LI-R with the following FINDINGS**

### **Findings:**

- A. The rezoning will not modify the intent, purpose, or spirit of the Douglas County Unified Development Code.
- B. The proposed zoning is consistent with the Comprehensive Future Land Use Plan categorization of this property as within the “Commerce Center” area incorporating mixed industrial, general and heavy commercial uses.
- C. The uses permissible in the proposed zoning district are generally compatible with surrounding properties.
- D. The granting of the Rezoning will not adversely affect the public health, safety, or welfare.

## **RECOMMENDATION FOR SPECIAL USE PERMIT**

The Planning Commission and Board of County Commissioners are given the opportunity to consider the compatibility of the use with the surrounding uses, to ensure consistency with the character of the area and to minimize impacts. Section 1207(b), standards for Special Use consideration, of the Douglas County UDC requires that, before approving an application for a Special Use Permit, the Planning Commission and County Commissioners shall find, based upon evidence and testimony presented at the hearing, the required standards have been met: A Special Use otherwise permitted within a zoning district shall be considered to be compatible with other uses permitted in the district, provided that due consideration is given to the 9 objective criteria previously analyzed. Emphasis may be placed on those criteria most applicable to the specific use proposed.

**Staff RECOMMENDS APPROVAL of this requested Special Use Permit S2023-72 with the following FINDINGS, CONDITIONS and DIRECTIVE TO STAFF:**

**Findings:**

- A. The use will not modify the Land Use Plan or the intent, purpose, or spirit of the Douglas County Unified Development Code.
- B. The granting of the Special Use Permit will not adversely affect the public health, safety, or welfare.

**Conditions:**

- 1. Any other use of the property not identified within Section 210 – Uses allowed in each zoning district, specifically tables 2.2 (Principle Uses Allowed by Right) and 2.3 (Accessory Uses Allowed by Right) of the Douglas County Unified Development Code, may require the submission, review and approval of a new special use permit.
- 2. The applicant shall submit to the Development Review Committee (DRC) for review and consideration the specific site development and access management plans to address the development standards in the UDC and the concerns and requirements expressed in the specific agency impact statements reviewed in this staff report dated December 5, 2023.

**Directive to Staff:**

The Planning and Zoning Department is directed to conduct an administrative review of the property during the 1-year anniversary month of this approval and to present a report if the use is not established and/or the property is not in full compliance with the Douglas County Unified Development Code and/or all of the conditions of approval. If the use is not in full compliance, staff will schedule the permit for a hearing at the next public meeting to allow the applicant to show cause why the special use should not be revoked. THIS DIRECTIVE TO STAFF IS NOT INTENDED AS A CONDITION OF APPROVAL.