

REGIONAL REVIEW NOTIFICATION

Atlanta Regional Commission • 229 Peachtree Street NE | Suite 100 | Atlanta, Georgia 30303 • ph: 404.463.3100 fax: 404.463.3205 • atlantaregional.org

DATE: JANUARY 19, 2023

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

ARC has completed a regional review of the following 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 local government.

<u>Name of Proposal</u>: Rock House Road Data Center DRI 4078
 <u>Submitting Local Government</u>: Douglas County
 <u>Date Opened</u>: December 6, 2023 <u>Deadline for Comments</u>: Dec 21 2023 <u>Date Closed</u>: January 19, 2024

Description: A DRI review of a project to construct 1,465,000 SF of data center space in 4 buildings on a 134acre site located on Rock House Road in unincorporated Douglas County. The site is fully wooded and includes multiple streams and wetlands.

FINAL COMMENTS:

<u>Key Comments</u>

The project is not aligned with applicable Developing Rural Areas policy recommendations which note: "These areas are characterized by limited single-family subdivisions, large single-family lots, agricultural uses, protected lands, and forests. The region should strive to protect these areas by limiting infrastructure investments to targeted areas and allowing no development or only low- intensity development. "

According to the DRI Form 2, "Wetlands and streams will be impacted by the proposed development's building, truck courts, access roads, parking and associated grading."

Building 1 and a significant portion of Building 2 fall within the portion of the site designated Urban Residential on the County Future Land Use Map. The proposed industrial use is not consistent with the Urban Residential land use which is "intended to serve as a transitional buffer between commercial uses and existing single family neighborhoods, accompanying a variety of housing types." The existing Douglas County zoning for the site is R-A Residential-Agricultural District which is compatible with the site's Developing Rural Areas designation. The proposed Light Industrial zoning is not compatible with the site's Developing Rural Areas designation.

The Georgia Department of Natural Resources Wildlife Resources Division submitted extensive comments on the project which are attached. The comments include the following:

a large number of natural communities, plants and animals of highest priorty conservation status, including some listed at the federal and state level, are located within the reporting area of the project; and

the project is located in a high priority watershed identified to protect populations of high priority aquatic species, important coastal habitats, and migratory corridors for anadromous species.

The comments recommend the following:

consult with the U.S. FIsh and Wildlife Service to minimize impacts;

cluster development and minimize infrastructure, such as paved surfaces and utilities;

provide undisturbed buffers of at least 100 feet around any streams or wetlands at the site;

protect undeveloped greenspace with a conservation easement or other legal agreement;

preserve and replace native vegetation should be incorporated or preserved;

set aside as much land as possible to remain in a natural state;

urge developers to consider preserving relatively undisturbed areas which are crucial for wildlife conservation;

refer to Green Growth Guidelines at the Georgia DNR Coastal Resources Division website (<u>https://coastalgadnr.org/GGG</u>).

The project is expected to generate a total of 1,450 new daily vehicular trips; associated roadway improvements are proposed.

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- Developing Rural

Areas for this project - and provides accompanying growth policy recommendations which are detailed at the end of these comments.

Building 1 and a significant portion of Building 2 fall within the portion of the site designated Urban Residential on the County Future Land Use Map. The proposed industrial use is not consistent with the Urban Residential land use which is "intended to serve as a transitional buffer between commercial uses and existing single family neighborhoods, accompanying a variety of housing types."

The existing Douglas County zoning for the site is R-A Residential-Agricultural District which "is established to protect and promote a suitable environment for rural or "large lot suburban" family life, agriculture including the raising of livestock and poultry, and the development of natural resources and other uses requiring extensive areas of land" and which is compatible with the site's Developing Rural Areas designation. The proposed Light Industrial zoning is not compatible with the site's Developing Rural Areas designation.

Transportation and Mobility Comments

ARC's Transportation and Mobility Group comments are attached.

The project is expected to generate a total of 1,450 new daily vehicular trips; associated roadway improvements are proposed.

Opportunities for alternative transportation mode connections are limited by the sites rural location and proposed industrial use.

Care should be taken to ensure that the constructed development provides 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 Resource Comments

ARC's Natural Resource Group comments are attached.

The USGS coverage for the project area and the submitted site plan both show an unnamed blue-line stream running from northwest to southeast through the largest part of the site. The submitted site plan also shows a tributary to the mapped stream running from west to east through the center of the property with its own tributary joining it from the south. A second tributary to the blue-line stream is also shown running west to east along the southern boundary of the project property. The County 50-foot undisturbed buffer and 75-foot impervious surface setback, as well as the State 25-foot State Erosion and Sedimentation Control buffer are shown along all streams on the site plan and are identified on the plans. The site plan shows four road crossings of the streams, as well as electric transmission line easement, both of which are allowed under the County Code. The site plan also shows Building 1 extending into the buffers and over the channel of the

mapped blue-line stream, Building 3 located over the south-to-north tributary, grading for the electric substation and a stormwater detention pond intruding into the buffers of the central tributary and the mapped blue-line stream, and portions of the truck access and parking around Buildings 2 and 4 intruding into the buffers of the central tributary and the mapped blue-line stream. All intrusions into the buffers not authorized under County regulations may require variances under the both the County Stream Buffer Ordinance and the State 25-foot State Erosion and Sedimentation Control buffer.

Environmental Comments

A large area of existing forested land will be cleared for the project. The project's buildings, truck courts, access roads, parking, electrical substation and associated grading will be built over significant portions of stream buffers, streams, and wetlands which is not in keeping with regional environmental policies.

The project can support the Atlanta Region's Plan 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 site improvements.

State of Georgia Department of Natural Resources Comments

Federally listed species have been documented within three miles or within the watershed(s) of the proposed project. To minimize potential impacts to federally listed species, we recommend consultation with the United States Fish and Wildlife Service. Please email GAES_Assistance@fws.gov for project consultation and survey recommendations.

Please be aware that state protected species have been documented near the proposed project. For information about these species, including survey recommendations, please visit our webpage at http://georgiawildlife.com/conservation/species-of-concern#rare-locations. Please be aware that state-owned lands are located near the proposed project. For further information about our state parks, please visit our webpage at https://gastateparks.org/.

Species listed above that have no "GA" or "US" status are considered Georgia species of concern. Locations of these species are tracked until enough information is gathered to determine if they should be added to the state list or if their populations do not warrant tracking. It is important to consider these species when planning projects. Please let us know if you have any questions regarding Georgia species of concern.

We advocate green growth, which focuses on environmentally sustainable development and leaving open space in newly developed areas. By clustering development and minimizing infrastructure, such as paved surfaces and utilities, conscientious design can help protect natural habitats from fragmentation and habitat degradation. Undisturbed buffers of at least 100 feet should be left surrounding any streams or wetlands at the site. We recommend that open greenspace be protected by use of a conservation easement or other legal agreement. The open space may be used for recreation, wildlife habitat, and stormwater control. Native vegetation should be incorporated or preserved. We recommend these developments set aside as much land as possible to remain in a natural state, and urge developers to consider preserving relatively undisturbed

areas for conservation. Contiguous, undeveloped habitats are crucial for wildlife conservation. For more information on Green Growth Guidelines, please visit the Georgia DNR Coastal Resources Division website (https://coastalgadnr.org/GGG). For more information on conservation opportunities in the state, please visit our website at www.georgiawildlife.com.

This project occurs within a high priority watershed(s). As part of Georgia's State Wildlife Action Plan, high priority watersheds were identified to protect populations of high priority aquatic species, important coastal habitats, and migratory corridors for anadromous species. Please refer to Appendix F of Georgia's State Wildlife Action Plan to find out more specific information about the listed high priority watershed(s) (https://georgiawildlife.com/wildlifeactionplan).

Unified Growth Policy Considerations: Developing Rural Areas

Developing Rural Areas are those areas in the region where little to no development has taken place, but where there is development pressure. These areas are characterized by limited single-family subdivisions, large single-family lots, agricultural uses, protected lands, and forests. The region should strive to protect these areas by limiting infrastructure investments to targeted areas and allowing no development or only low- intensity development. Limited existing infrastructure in these areas will constrain the amount of additional growth that is possible. Some transportation improvements may be needed in developing rural areas.

The project is not aligned with Developing Rural Areas recommendations. It could be somewhat better aligned by reducing stream buffer and wetland impacts and incorporating low-impact design approaches in constructed areas. Douglas County leadership and staff, along with the applicant team, should collaborate closely to ensure optimal sensitivity to the concerns of nearby local governments, neighborhoods, and natural systems.

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

GEORGIA DEPARTMENT OF NATURAL RESOURCE

GEORGIA REGIONAL TRANSPORTATION AUTHORITY

ATLANTA REGIONAL COMMISSION GEORGIA DEPARTMENT OF TRANSPORTATION

GEORGIA ENVIRONMENTAL FINANCE AUTHORITY COBB COUNTY Georgia Conservancy City of South Fulton GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS GEORGIA SOIL AND WATER CONSERVATION COMMISSION

CITY OF DOUGLASVILLE

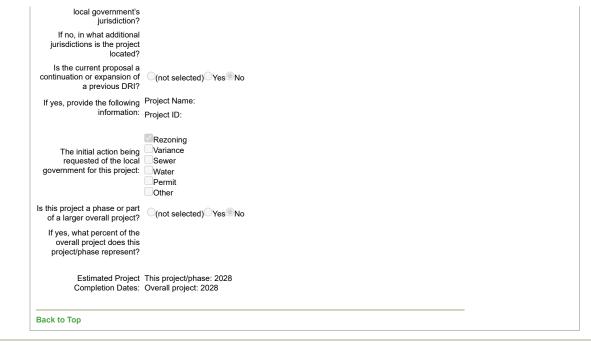
For questions, please contact Donald Shockey at (470) 378–1531 or <u>dshockey@atlantaregional.org</u>. This finding will be published to the ARC review website located at <u>http://atlantaregional.org/plan-reviews</u>.





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

DRI Initial Information Form



GRTA DRI Page | ARC DRI Page | RC Links | DCA DRI Page

DRI Site Map | Contact





Developments of Regional Impact

<u>DRI H</u>	ome <u>T</u>	<u>ier Map</u>	<u>Apply</u>	View Submiss	<u>ions</u>	<u>Login</u>	
DRI #4078							
			REGIONAI RI Informati				
This form is to be completed the proposed DRI. Refer to b information.	by the city or cou oth the Rules for	nty governmer the DRI Proc	nt to provide info cess and the DF	ormation needed by th RI Tiers and Thresho	ne RDC for its review Ids for more	v of	
	Local	Governm	ent Inform	ation			
Submitting Local Government:	Douglas						
Individual completing form:							
Telephone:	770-920-7313						
Email:	pshafer@dougla	ascountyga.gov	v				
		Project In	formation				
Name of Proposed Project:	Rock House Roa	ad Data Cente	er Site				
DRI ID Number:							
Developer/Applicant:	•	o Mike Irby					
	404-259-8223 mirby@taylorma	this com					
Lman(3).	minby@taylorma						
	Additio	onal Inform	nation Requ	uested			
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 proce	ss can not start u	intil this additio	onal information	is provided.			
	Ec	conomic D)evelopmer	nt			
Estimated Value at Build- Out:	\$300M						
Estimated annual local tax revenues (i.e., property tax, sales tax) likely to be generated by the proposed development:	\$3M						
Is the regional work force sufficient to fill the demand created by the proposed project?	(not selected)	YesNo					
Will this development displace any existing uses?	(not selected)	Yes					
If yes, please describe (inclue	ling number of ur	nits, square fee	et, etc):				
		Water	Supply				
Name of water supply	Douglaaville D			thority			
provider for this site:	Douglasvile-Do	uglas County V	water Sewer Au	uthority			

What is the estimated water supply demand to be generated by the project, measured in Millions of Gallons Per Day (MGD)?	1.14 MGD
Is sufficient water supply capacity available to serve the proposed project?	◯(not selected) [®] Yes [®] No
If no, describe any plans to e	xpand the existing water supply capacity:
Is a water line extension required to serve this project?	◯(not selected) ♥Yes No
If yes, how much additional 1,000 linear feet of 16-inch m	line (in miles) will be required? nain
	Wastewater Disposal
Name of wastewater treatment provider for this site:	Douglasvile-Douglas County Water Sewer Authority
What is the estimated sewage flow to be generated by the project, measured in Millions of Gallons Per Day (MGD)?	0.19 MGD
Is sufficient wastewater treatment capacity available to serve this proposed project?	◯(not selected) [®] Yes [®] No
If no, describe any plans to e	xpand existing wastewater treatment capacity:
Is a sewer line extension required to serve this project?	◯(not selected) ♥Yes No
If yes, how much additional li existing 12-inch gravity sewe	ne (in miles) will be required?on-site pump station & forced main required to tie into an r main on the site.
	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.)	1,450 daily trips, 185 AM peak hour trips, 156 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 the traffic study prepared by Kimley-Horn and Associates
	Solid Waste Disposal
How much solid waste is the project expected to	1200 Tons
generate annually (in tons)? Is sufficient landfill capacity available to serve this	◯(not selected) ♥Yes No
proposed project? If no, describe any plans to e	xpand existing landfill capacity:
Will any hazardous waste be generated by the development?	◯(not selected)◯Yes [®] No
If yes, please explain:	
	Stormwater Management

What percentage of the site 35% is projected to be impervious surface once the

Describe any measures proposed (such as buffers, detention or retention ponds, pervious parking areas) to mitigate the
project's impacts on stormwater management: Zoning buffers are provided as required. One storm water pond is
proposed to provide master detention for the site

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		
L	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: Wetlands and streams will be impacted by the proposed development's building, truck courts, access roads, parking and associated grading.			

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proposed development has been constructed?

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DRI Site Map | Contact



WILDLIFE RESOURCES DIVISION

MARK WILLIAMS COMMISSIONER TED WILL DIRECTOR

December 20, 2023

Donald Shockey Plan Review Manager Atlanta Regional Commission 229 Peachtree Street NE Suite 100 Atlanta, GA 30303

Subject: Known occurrences of natural communities, plants, and animals of highest priority conservation status on or near 2023 Rock house Road Site Data Center - DRI 4078 in Douglas County, GA

Dear Donald Shockey:

This is in response to your request on December 6, 2023. The following Georgia natural heritage database element occurrences (EOs) were selected for the current site using the local Hydrologic Unit Code (HUC) 10 watershed for elements whose range distribution is limited by aquatic systems (AQ) and within 3 miles for all other EOs (TR).

DRI 4078 - Rock House Road Site Data Center (-84.604446, 33.742246, WGS84)

- GA *Cambarus howardi* (Chattahoochee Crayfish) in Queens Mill Creek (AQ), approx. 5.2 mi NE of site
- GA *Cambarus howardi* (Chattahoochee Crayfish) [Historic] in Sweetwater Creek (AQ), approx. 0.9 mi NW of site
- GA *Cyprinella callitaenia* (Bluestripe Shiner) in Chattahoochee River (AQ), approx. 8.4 mi NE of site
- GA Cypripedium acaule (Pink Ladyslipper) (TR), approx. 2.7 mi W of site
- GA Cypripedium acaule (Pink Ladyslipper) (TR), approx. 1.9 mi NW of site
- GA *Cypripedium parviflorum* (Yellow Ladyslipper) [Historic?] (TR), approx. 1.6 mi W of site *Euphydryas phaeton* (Baltimore Checkerspot) [Historic] (TR), approx. 2.1 mi S of site
- GA Haliaeetus leucocephalus (Bald Eagle) (TR), approx. 2.4 mi NW of site
- US *Medionidus penicillatus* (Gulf Moccasinshell) [Historic] in Chattahoochee River (AQ), approx. 1.9 mi E of site
 - Micropterus cataractae (Shoal Bass) in Chattahoochee River (AQ), approx. 8.5 mi NE of site

Micropterus cataractae (Shoal Bass) in Sweetwater Creek (AQ), approx. 0.9 mi W of site Micropterus cataractae (Shoal Bass) in Sweetwater Creek (AQ), approx. 1.5 mi N of site Moxostoma sp. 1 (Apalachicola Redhorse) in Utoy Creek (AQ), approx. 1.8 mi E of site Necturus moleri (Gulf Coast Waterdog) [Historic] near Davis Mill Creek (AQ), approx. 12.4 mi NW of site

GA Notropis hypsilepis (Highscale Shiner) in Noses Creek (AQ), approx. 10.0 mi N of site

- GA Notropis hypsilepis (Highscale Shiner) in Lick Log Creek (AQ), approx. 11.2 mi NW of site
- GA Notropis hypsilepis (Highscale Shiner) in Sweetwater Creek (AQ), approx. 16.0 mi W of site

Panax quinquefolius (American Ginseng) (TR), approx. 1.3 mi SW of site *Pseudacris collinsorum* (Collinses' Mountain Chorus Frog) (TR), approx. 1.4 mi W of site *Satyrium kingi* (King's Hairstreak) (TR), approx. 1.3 mi W of site

GA Schisandra glabra (Bay Star-vine) (TR), approx. 0.2 mi SW of site

GA Symphyotrichum georgianum (Georgia Aster) (TR), approx. 0.9 mi NE of site 2011075 [Georgia Land Trust] (TR), approx. 1.1 mi E of site 2011075 [Georgia Land Trust] (TR), approx. 1.1 mi SE of site 2013054 [Georgia Land Trust] (TR), approx. 1.8 mi S of site SWEETWATER CREEK SP [Georgia Department of Natural Resources] (TR), approx. 0.2 mi W of site
SWEETWATER CREEK SP [Georgia Department of Natural Resources] (TR), approx. 1.9 mi NW of site
Trammell Crow Park [Fulton County] (TR), approx. 2.7 mi E of site
Chattahoochee River Lower North 8 (0313000201) [SWAP High Priority Watershed] (TR), on or within immediate vicinity of site
Chattahoochee River Lower North 7 (0313000203) [SWAP High Priority Watershed] (TR), approx. 1.5 mi S of site

Recommendations:

Federally listed species have been documented within three miles or within the watershed(s) of the proposed project. To minimize potential impacts to federally listed species, we recommend consultation with the United States Fish and Wildlife Service. Please email <u>GAES_Assistance@fws.gov</u> for project consultation and survey recommendations.

Please be aware that state protected species have been documented near the proposed project. For information about these species, including survey recommendations, please visit our webpage at <u>http://georgiawildlife.com/conservation/species-of-concern#rare-locations</u>. Please be aware that state-owned lands are located near the proposed project. For further information about our state parks, please visit our webpage at <u>https://gastateparks.org/</u>.

Species listed above that have no "GA" or "US" status are considered Georgia species of concern. Locations of these species are tracked until enough information is gathered to determine if they should be added to the state list or if their populations do not warrant tracking. It is important to consider these species when planning projects. Please let us know if you have any questions regarding Georgia species of concern.

There is a record of a nesting bald eagle (*Haliaeetus leucocephalus*) within three miles of the proposed project site. Although bald eagles are no longer listed as federally endangered, this species is still protected by the Migratory Bird Treaty Act, the Bald and Golden Eagle Protection Act, and the Georgia Endangered Species Act. This legislation continues to protect bald eagles from potentially harmful human activities. For more information on how to prevent impacts to

bald eagles, please review the National Bald Eagle Management Guidelines and other information located at: <u>https://www.fws.gov/birds/management/managed-species/eagle-management.php</u>.

We advocate green growth, which focuses on environmentally sustainable development and leaving open space in newly developed areas. By clustering development and minimizing infrastructure, such as paved surfaces and utilities, conscientious design can help protect natural habitats from fragmentation and habitat degradation. Undisturbed buffers of at least 100 feet should be left surrounding any streams or wetlands at the site. We recommend that open greenspace be protected by use of a conservation easement or other legal agreement. The open space may be used for recreation, wildlife habitat, and stormwater control. Native vegetation should be incorporated or preserved. We recommend these developments set aside as much land as possible to remain in a natural state, and urge developers to consider preserving relatively undisturbed areas for conservation. Contiguous, undeveloped habitats are crucial for wildlife conservation. For more information on Green Growth Guidelines, please visit the Georgia DNR Coastal Resources Division website (<u>https://coastalgadnr.org/GGG</u>). For more information on conservation opportunities in the state, please visit our website at <u>www.georgiawildlife.com</u>.

This project occurs within a high priority watershed(s). As part of Georgia's State Wildlife Action Plan, high priority watersheds were identified to protect populations of high priority aquatic species, important coastal habitats, and migratory corridors for anadromous species. Please refer to Appendix F of Georgia's State Wildlife Action Plan to find out more specific information about the listed high priority watershed(s) (<u>https://georgiawildlife.com/wildlifeactionplan</u>).

Disclaimer:

Please keep in mind the limitations of our database. The data collected by the Wildlife Conservation Section comes from a variety of sources, including museum and herbarium records, literature, and reports from individuals and organizations, as well as field surveys by our staff biologists. In most cases the information is not the result of a recent on-site survey by our staff. Many areas of Georgia have never been surveyed thoroughly. Therefore, the Wildlife Conservation Section can only occasionally provide definitive information on the presence or absence of rare species on a given site. Our files are updated constantly as new information is received. Thus, information provided by our program represents the existing data in our files at the time of the request and should not be considered a final statement on the species or area under consideration.

If you know of populations of highest priority species that are not in our database, please fill out the appropriate data collection form and send it to our office. Forms can be obtained through our web site (<u>http://georgiawildlife.com/conservation/species-of-concern#rare-locations</u>) or by contacting our office. If we can be of further assistance, please let us know.

Sincerely,

(Mf

Maggie Aduddell Hunt, Wildlife Biologist maggie.hunt@dnr.ga.gov, (706) 557-3228

Data Available on the Wildlife Conservation Section Website

- Georgia protected plant and animal species profiles are available on our website. These profiles cover basics such as species physical descriptions, preferred habitat, and life history, as well as threats, management recommendations, and conservation status. To view these profiles, visit: <u>http://georgiawildlife.com/conservation/species-of-concern#rare-locations</u>
- Rare species and natural community information can be viewed by Quarter Quad, County, and HUC 8 Watershed. To access this information, please visit our GA Rare Species and Natural Community Information page at: <u>http://georgiabiodiversity.org/</u>
- Downloadable files of rare species and natural community data by Quarter Quad and County are also available. These can be downloaded at: <u>http://georgiabiodiversity.org/natels/natural-element-locations.html</u>

ROCK HOUSE ROAD SITE DATA CENTER DRI Douglas County Natural Resources Review Comments December 13, 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 Corridor and is not subject to 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. For large water supply watersheds without a water supply reservoir, the only 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.

Stream Buffers

The USGS coverage for the project area and the submitted site plan both show an unnamed blue-line stream running from northwest to southeast through the largest part of the site. The submitted site plan also shows a tributary to the mapped stream running from west to east through the center of the property with its own tributary joining it from the south. A second tributary to the blue-line stream is also shown running west to east along the southern boundary of the project property. The County 50-foot undisturbed buffer and 75-foot impervious surface setback, as well as the State 25-foot State Erosion and Sedimentation Control buffer are shown along all streams on the site plan and are identified on the plans. The site plan shows four road crossings of the streams, as well as electric transmission line easement, both of which are allowed under the County Code. The site plan also shows Building 1 extending into the buffers and over the channel of the mapped blue-line stream, Building 3 located over the south-to-north tributary and the mapped blue-line stream, and portions of the truck access and parking around Buildings 2 and 4 intruding into the buffers of the central tributary and the mapped blue-line stream. All intrusions into the buffers not authorized under County regulations may require variances under the both the County Stream Buffer Ordinance and the State 25-foot State Erosion and Sedimentation Control buffer.

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

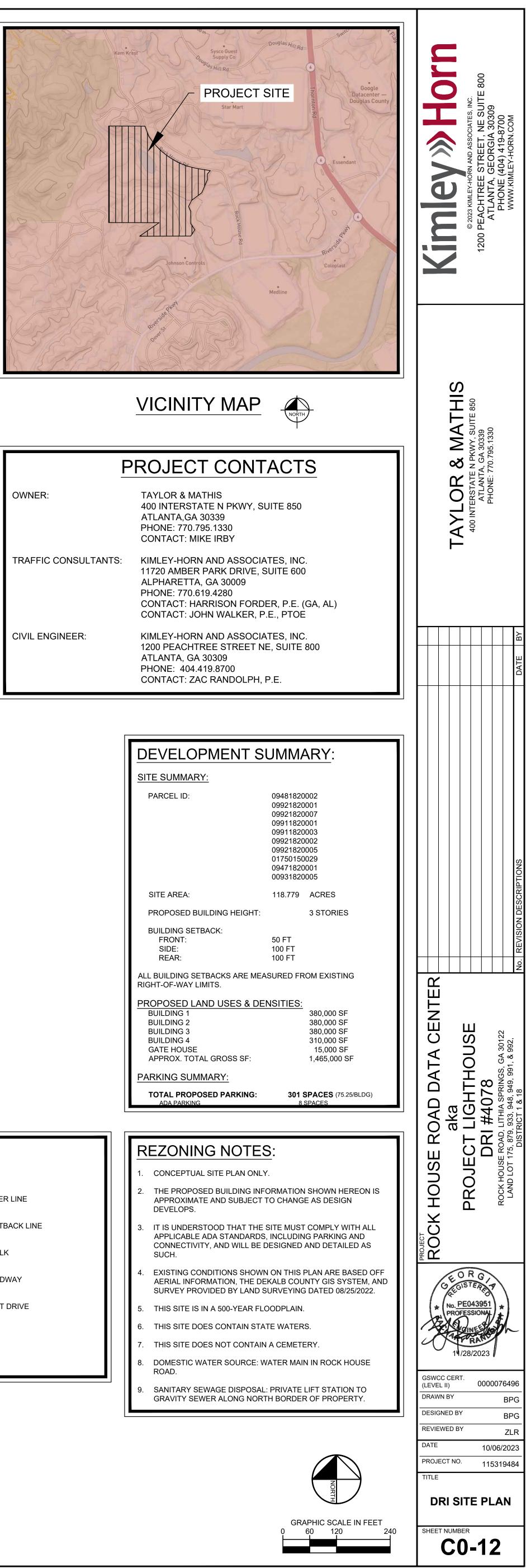
Stormwater/Water Quality

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 (<u>www.georgiastormwater.com</u>) 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.

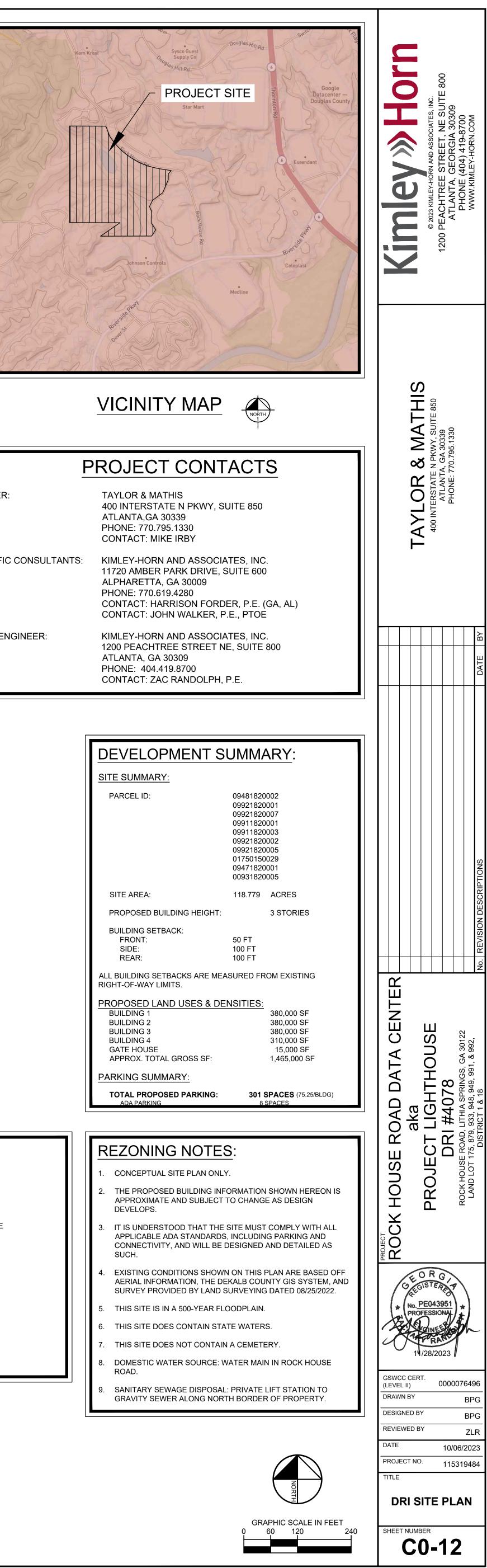
During construction, the project should conform to the relevant state and federal erosion and sedimentation control requirements.

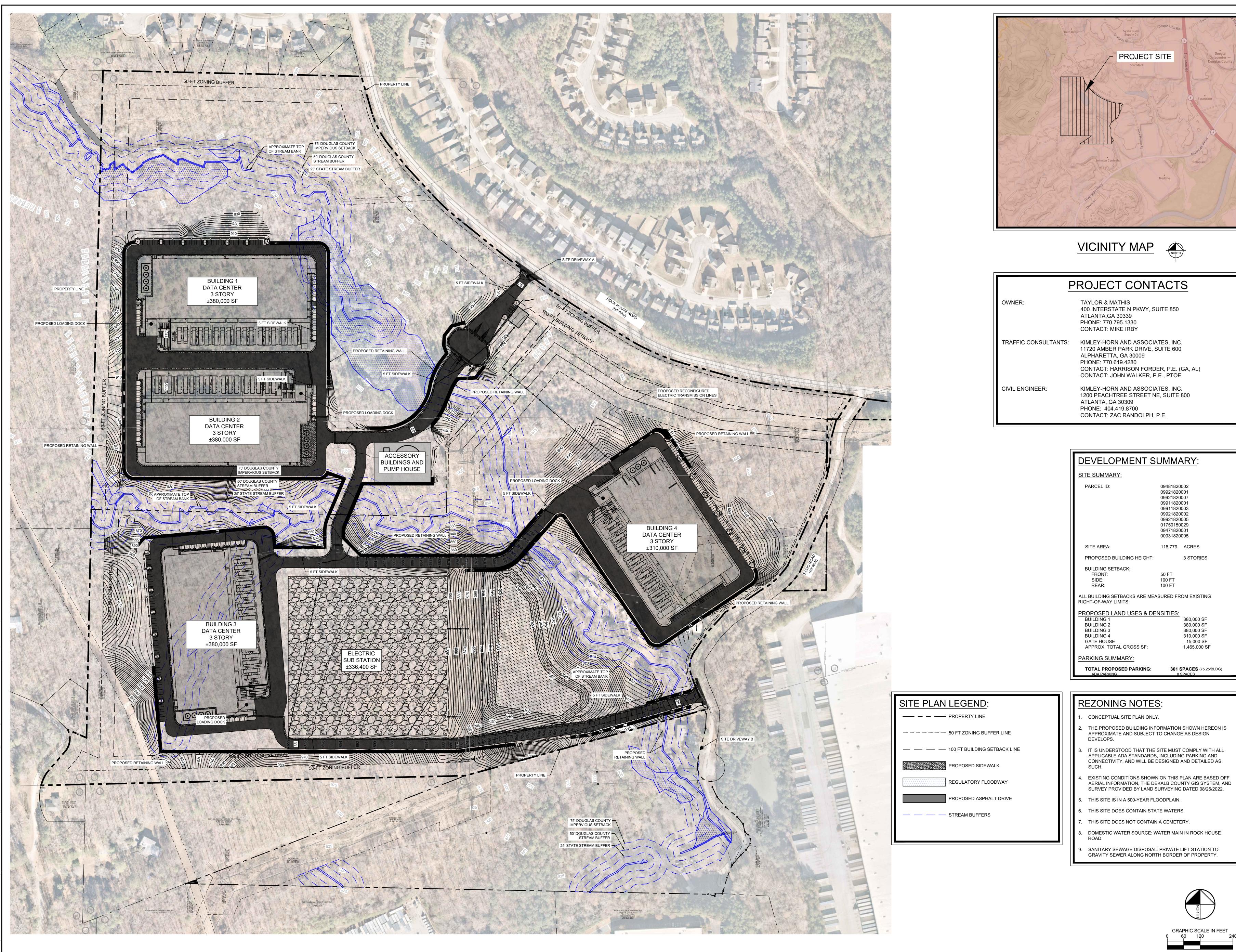






WNER:	TAYLOR & MATHIS 400 INTERSTATE N PKWY, SUITE 850 ATLANTA,GA 30339 PHONE: 770.795.1330 CONTACT: MIKE IRBY
RAFFIC CONSULTANTS:	KIMLEY-HORN AND ASSOCIATES, INC. 11720 AMBER PARK DRIVE, SUITE 600 ALPHARETTA, GA 30009 PHONE: 770.619.4280 CONTACT: HARRISON FORDER, P.E. (G CONTACT: JOHN WALKER, P.E., PTOE
IVIL ENGINEER:	KIMLEY-HORN AND ASSOCIATES, INC. 1200 PEACHTREE STREET NE, SUITE 8 ATLANTA, GA 30309 PHONE: 404.419.8700



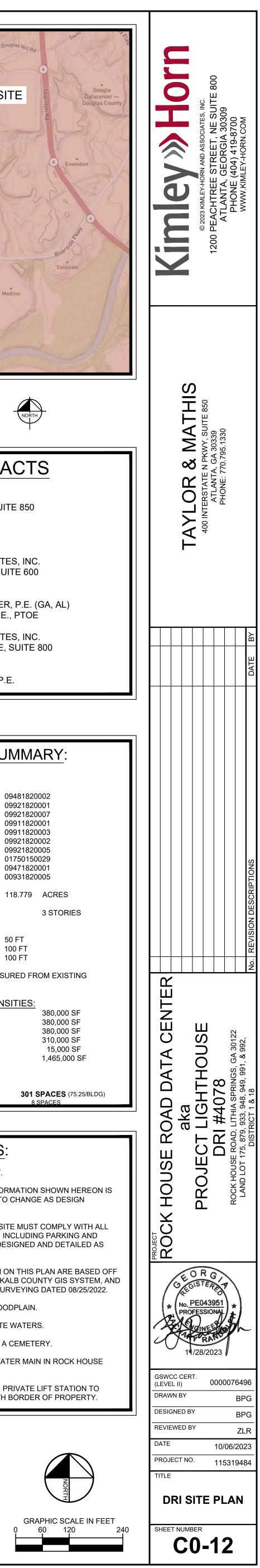


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50 FT

100 FT

100 FT





regional impact + local relevance

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

DRI INFORMATION

DRI Number	#4078		
DRI Title	Title Rock House Road Data Center Site (AKA Project Lighthouse)		
County	Douglas County		
City (if applicable)	N/A		
Address / Location	1971 Rock House Road, Lithia Springs, GA		
Proposed Developme	 nt Type: DRI review of a project to construct 1,465,000 SF of data center space in 4 buildings on a 134-acre site located on Rock House Road in unincorporated Douglas County. The site is mostly wooded and includes multiple streams and wetlands. Build Out: 2028 		
Review Process	EXPEDITED NON-EXPEDITED		
REVIEW INFORMATION			
Prepared by	ARC Transportation Access and Mobility Division		
Staff Lead	Reginald James		
Copied	Jean Hee Barrett		
Date	December 13, 2023		
TRAFFIC STUDY Prepared by	Kimley-Horn		

Prepared by	Kimley-Horn
Date	November 1, 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)

The planned and programmed projects list can be found on page 12 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 proposed driveways provide access to the project site 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 proposed driveways provide access to the project site 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?

- 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.

ca joi bio loo	nnot or prefer not to driv bs, and can help reduce co cycling between the devel	lopments and transit services provide options for people who e, expand economic opportunities by better connecting people and ongestion. If a transit service is available nearby, but walking or lopment site and the nearest station is a challenge, the applicable uraged to make the connection a funding priority for future structure improvements.
\ge	NOT APPLICABLE (neare	st bus, shuttle or circulator stop more than one mile away)
	SERVICE WITHIN ONE M	ILE (provide additional information below)
	Operator(s)	Click here to enter name of operator(s).
	Bus Route(s)	Click here to enter bus route number(s).
	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



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	Click here to provide name of facility.
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)
- \boxtimes 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)

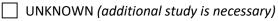
- YES (stub outs will make future connections possible when adjacent parcels redevelop)
- NO (the development site plan does not enable walking or bicycling to/from adjacent parcels)
- NO (the site plan precludes future connections with adjacent parcels when they redevelop)
 - NOT APPLICABLE (adjacent 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?



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.