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**DRI REGIONAL REVIEW FINDING**

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| **Date**: March 28, 2024 |  |
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**TO:** Mayor Eric Dial, Town of Tyrone

**ATTN TO:** Phillip Trocquet, Asst. Town Manager, Town of Tyrone

**FROM:** Mike Alexander, COO, Atlanta Regional Commission

**RE:** Development of Regional Impact (DRI) Review

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: Project Rita DRI 4094**

**Submitting Local Government:** Town of Tyrone

**Date Opened:** March 13, 2024 **Date Closed:** March 28, 2024

**Description:** A DRI review of a proposal to construct 504,600 SF of data center space in two buildings on a 161-acre wooded site at the intersection of Kirkley Road and State Route 74 in Fayette County which is proposed for annexation by the Town of Tyrone.

**Comments:**

***Key Comments***

*While the project is not well aligned with applicable Developing Suburbs policy recommendations which state “There is a need in these areas for additional preservation of critical environmental locations and resources, as well as agricultural and forest uses,” it does retain a large portion of natural area which is supportive of regional development and environmental policies.*

*The project will generate a total of 500 daily new vehicular trips which will have minimal impact on adjacent roadways.*

*A requested reduction in required parking spaces would be supportive of regional transportation and environmental policies.*

*The appropriate utilization and maintenance of the large amounts of natural area being retained would be supportive of regional environmental policies and efforts in this regard are encouraged.*

*There are growing concerns about the impacts of high levels of energy and water consumption for cooling generated by the tremendous increase in data center projects in the Atlanta region. This project application proposes 0.225 MGD of water supply demand and 0.075 MGD of estimated sewage flow. It is unclear if these figures represent an annual average or daily maximum flow need. Given that daily maximum water flow requirements often coincide with the hottest days of the year, the peak demand for water has a higher likelihood of occurring during times of water stress in the water supply watershed. ARC therefore recommends that the Fayette County Water System carefully examine its capacity to meet peak-day demands for this project, in addition to other current and projected peak-day demands. ARC also recommends that the local government and the Fayette County Water System require the installation of advanced “waterless” cooling technologies or “near waterless” technology for data center projects to reduce the burden on the drinking water supplies and increase the resiliency of both the project and the potable water system.*

**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 with accompanying policy recommendations to all areas in the region. This DRI site is designated Developing Suburbs; associated policy recommendations are provided at the end of these comments.

**Transportation and Mobility Comments**

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

The project will generate a total of 500 daily new vehicular trips which will have minimal impact on adjacent roadways.

The project will include a limited number of employees and there are few nearby pedestrian destinations so no external pedestrian connectivity recommendations are provided.

A variance has been requested to reduce parking spaces from 245 required to 120. A reduction in the number of required parking spaces would be supportive of regional transportation and environmental policies.

The Town of Tyrone and Fayette County submitted comments noting that the primary construction entrance should be located on SR-74 as opposed to Kirkley Road to reduce impacts to adjacent areas.

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 Resources Comments**

ARC’s Natural Resources Group comments are attached. ARC recognizes that energy demands will be very high for this project and that related water needs for cooling purposes will create a large peak demand from the Fayette County Water System. The application proposes 0.225 MGD of water supply demand and 0.075 MGD of estimated sewage flow generated by the project. It is unclear if these figures represent an annual average or daily maximum flow need. Given that daily maximum flow requirements for cooling purposes often occur during the hottest days of the year, the demand for water has a higher likelihood of occurring during times of water stress in the water supply watershed.

The water resources of the metro Atlanta region are critically important to the region’s economic vitality and quality of life. The region lies in the headwaters of six major river basins, where natural surface water sources are small relative to other major metropolitan areas and in need of a high level of protection. The firm yield of water supply sources available to individual jurisdictions also varies, and some jurisdictions have larger available supplies than others. ARC recommends a careful examination by the Fayette County Water System of its capacity to meet peak-day demands for this project, in addition to other current and projected future peak-day demands. ARC also recommends that the local government and the Fayette County Water System require the installation of advanced “waterless” cooling technologies or “near waterless” technology to reduce the burden on the drinking water supplies and increase the resiliency for both the project and the potable water system.”

Additional ARC Water Resources Comments

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

Water Supply Watersheds

The proposed project property is partly within the Line Creek Water Supply Watershed which is a public water supply source for both the City of Newnan in Coweta County and for Fayette County It is classified as a small (less than 100 square mile) water supply watershed. Under the Georgia Planning Act of 1989, all development in a small public water supply watershed is subject to the DNR Part 5 Water Supply Watershed Minimum Criteria (Chapter 391-3-16-.01, Criteria for Water Supply Watersheds) unless alternative criteria are developed and adopted by the jurisdiction according to the requirements of the Part 5 criteria and are then approved by Georgia EPD. The Part 5 criteria include an impervious limit of 25% impervious surface in the entire watershed and a 100-foot vegetative buffer and 150-foot impervious setback along all perennial streams within 7 miles upstream of a public water supply intake. More than 7 miles upstream, the minimum criteria halve the buffer and setback to 50 and 75 feet, respectively. While the proposed project is partly in the City of Fairburn as well as the City of Tyrone, the project site plan shows all proposed development within the City of Tyrone.

For that reason, only the Tyrone water supply watershed requirements will be discussed here. The City of Tyrone has a water supply watershed protection ordinance addressing the Line Creek and Flat Creek water supply watersheds that follows the Part 5 Criteria. The portion of the project within the Line Creek Water Supply Watershed will need to meet the relevant requirements of the Tyrone Water Supply Watershed ordinance.

Stream Buffers

Both the USGS coverage for the project area and the proposed project site plan show Trickum Creek, a perennial blue line stream, crossing the westernmost portion of the property in an area that straddles the Tyrone and Fairburn City line and is surrounded by wetlands. Based on the submitted site plan, no development is proposed in the vicinity of the stream. If any development is proposed in the vicinity of the stream, in addition to any wetland requirements, it would need to meet either the City of Tyrone’s or the City of Fairburn’s stream buffer ordinance, or both, depending on location. the City of Fairburn stream. Both jurisdictions’ stream buffer ordinances require a 50-foot undisturbed buffer and a 75-foot impervious surface setback. Such development would also be subject to the State 25-foot Sediment and Erosion Control Buffer.

**Fayette County Comments**

Fayette County submitted comments which are attached. They include general departmental comments as well as Fayette County Water System comments on the procedures and requirements for establishing water supply to the project.

**Other Environmental Comments**

Utilization of green infrastructure and low-impact design techniques for project impervious areas, including additional trees, pervious pvaing, and flush rather than raised curb planting islands in parking areas, would be supportive of regional stormwater and environmental policies. A natural habitat focused design for the proposed drainage pond would also be supportive of regional environmental policies.

The project is commendably retaining a large amount of natural area which could potentially be incorporated into a management and preservation system of some kind to ensure its proper maintenance. The property owners may be able to benefit from some conservation incentives in this regard.

**Atlanta Region’s Plan Growth Policy Considerations: Developing Suburbs**

The Atlanta Region’s Plan identifies Developing Suburbs as areas in the region where suburban development has occurred, and the conventional development pattern is present but not set. These areas are characterized by residential development with pockets of commercial and industrial development. These areas represent the extent of the urban service area. There is a need in these areas for additional preservation of critical environmental locations and resources, as well as agricultural and forest uses. Limited existing infrastructure in these areas will constrain the amount of additional growth that is possible. Transportation improvements are needed within these Developing Suburbs, but care should be taken not to spur unwanted growth.

The project is not aligned with Developing Suburbs policy recommendations which state “There is a need in these areas for additional preservation of critical environmental locations and resources, as well as agricultural and forest uses.” However, a substantial portion of the site is being retained as undeveloped natural area which is supportive of regional environmental policies. The project could be further aligned with regional development policies through the use of green infrastructure and low-impact development approaches in the project design and through the potential incorporation of the retained natural areas into a larger management and preservation system. Town of Tyrone leadership and staff, along with the applicant team, should collaborate closely to ensure optimal sensitivity to the needs of nearby local governments, neighborhoods, and natural

**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 Fayette County

Clayton County Town of Tyrone City of Fairburn

City of South Fulton City of Palmetto City of Chattahoochee Hills

City of Union City Coweta County City of Peachtree City

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