

DATE: October 9, 2024

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**TO:** Chairman Romona Jackson Jones, Douglas County Commission  
**ATTN TO:** Allison Duncan, Planning and Zoning Manager, 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:** Douglas Waldrop DRI 4192

**Submitting Local Government:** Douglas County

**Date Opened:** September 12, 2024

**Date Closed:** October 9, 2024

**Description:** A DRI review of a proposal to construct a data center with 1,760,850 million SF of space in 2 buildings with associated support facilities on a 166-acre site at 2912 Post Road in Douglas County.

**Comments:**

**Key Comments**

*The project is not aligned with applicable Rural Areas policy recommendations set forth in the Atlanta Region's Plan which stress the need to protect rural areas and their character and note: "There is a strong desire from residents and elected officials in these areas to keep them rural...The region is striving to protect these areas by limiting infrastructure investments to targeted areas and allowing no development or only low impact development."*

*The project is somewhat aligned with regional environmental policies in that it preserves some of the site as natural area and to some extent limits stream buffer impacts. It could be more aligned with these policies by creating a mechanism for conserving and maintaining the open space retained, utilizing a low-impact design and construction approach, and allocating some of the substantial local revenue generated toward natural area conservation and acquisition elsewhere in the County.*

*There are growing concerns about the impacts of high levels of energy and water consumption generated by the tremendous increase in the number of data center projects in the Atlanta region. The applicable water provider should carefully examine its capacity to meet peak-day project demands.*

*The project will generate a total of 1,744 new vehicular trips; a number of roadway are proposed to help mitigate the traffic impact.*

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

There are growing concerns about the impacts of high levels of energy and water consumption generated by the tremendous increase in the number of data center projects in the Atlanta region. ARC therefore recommends that the applicable water provider carefully examine its capacity to meet peak-day project demands, in addition to other current and projected peak-day demands. ARC also recommends the use of advanced "waterless" cooling technologies or "near waterless" technology for data center projects.

### **Transportation and Mobility Comments**

ARC's Transportation and Mobility Group comments are attached.

The project will generate a total of 1,744 new vehicular trips; a range of roadway modifications are proposed to mitigate the traffic impact.

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 Group Comments**

ARC's Natural Resource 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 Douglasville-Douglas County Water and Sewer Authority (DDCWSA). The application proposes 0.01 MGD of water supply demand and 0.008 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 DDCWSA 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 DDWSA 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.

The project property is located in the Dog River Water Supply Watershed, which is a small (less than 100 square miles) water supply watershed as defined under the Part 5 Criteria of the 1989 Georgia Planning Act. Douglas County has established its own water supply watershed protection measures in its Unified Development Code (UDC), which apply in lieu of the Part 5 Criteria of the 1989 Georgia Planning Act. Per Section 9, Environmental Protection of the UDC, the project site is in the Dog River secondary area, which includes the portion of the watershed north of I-20. The criteria for the Dog River secondary area include a 50-foot vegetative buffer and 75-foot impervious setback along both perennial and intermittent USGS blue line streams. The UDC only gives impervious limits for residential and commercial uses, not industrial. Commercial uses are limited to 25 percent of the project property, but this can be increased to 50 percent with a Special Use approval by the County Commission. The water supply watershed requirements also serve as the buffer zone ordinance for this watershed.

The USGS coverage for the project area and the submitted site plan both show a blue-line tributary of Mobley Creek starting at the existing pond on the property and running south through the property. The submitted site plan shows a short segment of an unmapped stream flowing into the mapped tributary. The submitted conceptual site plan shows and identifies the 25-foot State Sediment and Erosion Control Buffer as well as the County 50-foot undisturbed buffer and 75-foot impervious setback on both streams. The only intrusions into the buffers shown on the site plan are two road crossings, which are allowed under Section 9, Environmental Protection, of the County Unified Development Code.

### **Environmental Comments**

The project is somewhat aligned with regional environmental policies in that it preserves some of the site as natural area. Stream buffer intrusions are proposed for two road bridges. It could be more aligned with these policies by creating a mechanism for conserving and maintaining the open space retained, utilizing a low-impact design and construction approach, and allocating some of the substantial local revenue generated toward natural area conservation and acquisition elsewhere in the County. The project can support The Atlanta Region's Plan by incorporating other 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.

### **City of Hiram Comments**

Comments received from the City of Hiram are attached.

### **Unified Growth Policy Map Considerations: Rural Areas**

This DRI site is designated Rural Areas on the Unified Growth Policy Map which are areas in the region where limited development has taken place or and where development pressure is low. These areas are characterized by sporadic, large single-family lots, agricultural uses, protected lands, and forests. These areas border more central developed and developing areas and represent the limits of the urban service area in the region. There is a strong desire from residents and elected officials in these areas to keep them rural. Increased development threatens existing rural economic uses, such as forestry, agriculture, and tourism.

To maintain economic viability without undesirable development, these areas may be appropriate as “sending” areas in potential Transfer of Development Rights (TDR) programs. The region is striving to protect these areas by limiting infrastructure investments to targeted areas and allowing no development or only low impact development. There will be a continued need to maintain existing transportation infrastructure, but care should be taken not to spur unwanted growth by inappropriate expansion of infrastructure capacity.

The project is not aligned with Rural Areas policies due primarily to its large building and infrastructure footprints . It could be better aligned with these policies by retaining additional open space, creating a mechanism for conserving and maintaining the open space retained, utilizing a low-impact design and construction approach, and allocating some of the substantial local revenue generated toward natural area conservation and acquisition elsewhere in the County.m The final design of the project could further the intent of the Rural Areas recommendations by utilizing rural character elements in the design of project roads, bridges, fences, and related components.

Douglas County 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 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	CITY OF DOUGLASVILLE
CITY OF VILLA RICA	DOUGLAS COUNTY	PAULDING COUNTY
CARROLL COUNTY		

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 #4192

#### 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: 770-920-7313

E-mail: [pshafer@douglascountyga.gov](mailto:pshafer@douglascountyga.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: Douglas Waldrop

Location (Street Address, 2912 Post Rd, Winston, GA 30187  
GPS Coordinates, or Legal  
Land Lot Description):

Brief Description of Project: New light industrial buildings to house data center uses together with associated roads, parking, infrastructure

#### 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:

Project Size (# of units, floor area, etc.): 1,760,850 square feet across 2 two-story buildings

Developer: TC Atlanta Development, Inc.

Mailing Address: 3550 Lenox Rd NE

Address 2: Suite 2200

City: Atlanta State: GA Zip: 30326

Telephone: 404-441-1992

Email: [sharris@trammellcrow.com](mailto:sharris@trammellcrow.com)

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

If yes, property owner: Fred and Tommy Waldrop, MLO Douglasville, 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

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: 2027 Overall project: 2027

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### DRI #4192

#### 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: 770-920-7313  
Email: pshafer@douglascountygga.gov

#### Project Information

Name of Proposed Project: Douglas Waldrop  
DRI ID Number: 4192  
Developer/Applicant: TC Atlanta Development, Inc.  
Telephone: 404-441-1992  
Email(s): sharris@trammellcrow.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: \$2.2 Billion Dollars

Estimated annual local tax revenues (i.e., property tax, sales tax) likely to be generated by the proposed development: \$50.0 Million Dollars

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

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

0.01 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:

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?

### Wastewater Disposal

Name of wastewater treatment provider for this site:

DOUGLASVILLE-DOUGLAS COUNTY WATER AND SEWER AUTHORITY

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

0.008 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?

### 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.)

223 AM Peak Hour Trips/Day, 188 PM Peak Hour Trips/Day

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: Driveway 1: Install eastbound right-turn deceleration lane & westbound left-turn lane on Hwy 78 Post Rd @ I-20 Westbound Ramp: DCDOT & GDOT to ingestive inclusion of southbound right-turn lane onto interstate

### Solid Waste Disposal

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

+/- 480 tons/yr

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:

### Stormwater Management

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

36.7%



proposed development has been constructed?

Describe any measures proposed (such as buffers, detention or retention ponds, pervious parking areas) to mitigate the project's impacts on stormwater management: The project will implement the use of detention ponds and comply with local and state buffers to mitigate the projects impact on storm-water management.

### 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:

This project lies within the Dog River Secondary Protection Area, which limits impervious surface area. There is potential for wetlands on the project site, and these areas will be carefully evaluated as the project advances to minimize potential impacts.

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**DOUGLAS WALDROP DRI**  
**Douglas County**  
**Natural Resources Review Comments**  
**September 19, 2024**

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 Douglasville-Douglas County Water and Sewer Authority (DDCWSA). The application proposes 0.01 MGD of water supply demand and 0.008 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 DDCWSA 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 DDWSA 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 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 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 Dog River Water Supply Watershed, which is a small (less than 100 square miles) water supply watershed as defined under the Part 5 Criteria of the 1989 Georgia Planning Act. Douglas County has established its own water supply watershed protection measures in its Unified Development Code (UDC), which apply in lieu of the Part 5 Criteria of the 1989 Georgia Planning Act. Per Section 9, Environmental Protection of the UDC, the project site is in the Dog River secondary area, which includes the portion of the watershed north of I-20. The criteria for the Dog River secondary area include a 50-foot vegetative buffer and 75-foot impervious setback along both perennial and intermittent USGS blue line streams. The UDC only gives impervious limits for residential and commercial uses, not industrial. Commercial uses are limited to 25 percent of the project property, but this can be increased to 50 percent with a Special Use approval by the County Commission. The water supply watershed requirements also serve as the buffer zone ordinance for this watershed.

The property is also 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. Proposed intakes in South Fulton and Coweta County 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.

**Douglas Waldrop DRI**  
**ARC Natural Resources Comments**  
**Page Two**  
**September 19, 2024**

**Stream Buffers**

The USGS coverage for the project area and the submitted site plan both show a blue-line tributary of Mobley Creek starting at the existing pond on the property and running south through the property. The submitted site plan shows a short segment of an unmapped stream flowing into the mapped tributary. The submitted conceptual site plan shows and identifies the 25-foot State Sediment and Erosion Control Buffer as well as the County 50-foot undisturbed buffer and 75-foot impervious setback on both streams. The only intrusions into the buffers shown on the site plan are two road crossings, which are allowed under Section 9, Environmental Protection, of the County Unified Development Code.

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.

**From:** [Hood, Alan C.](#)  
**To:** [Donald Shockey](#)  
**Subject:** RE: R2024 Douglas Waldrop DRI 4192 - Preliminary Report and Comments Request  
**Date:** Monday, September 30, 2024 8:52:10 AM  
**Attachments:** [image001.png](#)

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Donald,

The proposed data center with 1,760,850 million SF of space in 2 buildings with associated support facilities on a 166-acre site at 2912 Post Road in Douglas County is over 10 miles from the nearest open to the public civil airport. It is located outside any FAA approach or departure surfaces, and airport compatible land use areas, and does not appear to impact any airport.

If any construction equipment or construction exceeds 200' AGL, an FAA Form 7460-1 must be submitted to the Federal Aviation Administration according to the FAA's Notice Criteria Tool found here (<https://oeaaa.faa.gov/oeaaa/external/gisTools/gisAction.jsp?action=showNoNoticeRequiredToolForm>). Those submissions for any associated cranes may be done online at <https://oeaaa.faa.gov>. The FAA must be in receipt of the notifications, no later than 120 days prior to construction. The FAA will evaluate the potential impacts of the project on protected airspace associated with the airports and advise the proponent if any action is necessary.

Thank you for the opportunity to comment on the proposed development.

**Alan Hood**

*Airport Safety Data Program Manager*



*Aviation Programs*

600 West Peachtree Street NW

6<sup>th</sup> Floor

Atlanta, GA, 30308

404.660.3394 cell

404.532.0082 office

Website: <https://www.dot.ga.gov/GDOT/pages/AirportAid.aspx>

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**From:** Donald Shockey <DShockey@atlantaregional.org>

**Sent:** Monday, September 23, 2024 4:55 PM

**To:** cmcgrady@hiram-ga.gov; comdev@paulding.gov; sdaniels@villarica.gov; chuck.mueller@dnr.state.ga.us; gaswcc.swcd@gaswcc.ga.gov; hhill@gefa.ga.gov; Jon West <jon.west@dca.ga.gov>; kmoore@gaconservancy.org; nongame.review@dnr.ga.gov; slucki@gefa.ga.gov; Zane Grennell - Georgia DCA <zane.grennell@dca.ga.gov>; Amy Goodwin

**From:** [Donald Shockey](#)  
**To:** [Cliff McGrady](#)  
**Subject:** RE: R2024 Douglas Waldrop DRI 4192 - Preliminary Report and Comments Request  
**Date:** Tuesday, September 24, 2024 10:55:00 AM

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Thanks Cliff, we'll include your comments in the Final Report.

Best,

Donald Shockey,

**Donald P. Shockey, AICP-CUD, LEED GA, CNU-A**

Plan Review Manager, Community Development

Atlanta Regional Commission

P | 470.378.1531

[DShockey@atlantaregional.org](mailto:DShockey@atlantaregional.org)

[atlantaregional.org](http://atlantaregional.org)

International Tower

229 Peachtree Street NE | Suite 100

Atlanta, Georgia 30303

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**From:** Cliff McGrady <cmcgrady@hram-ga.gov>  
**Sent:** Tuesday, September 24, 2024 8:44 AM  
**To:** Donald Shockey <DShockey@atlantaregional.org>  
**Subject:** RE: R2024 Douglas Waldrop DRI 4192 - Preliminary Report and Comments Request

Good Morning,

Even though this project will not affect the City of Hiram directly, I agree with the 'preliminary comments' that these types of developments are large consumers of the water in our region and we cannot allow this to be abused.

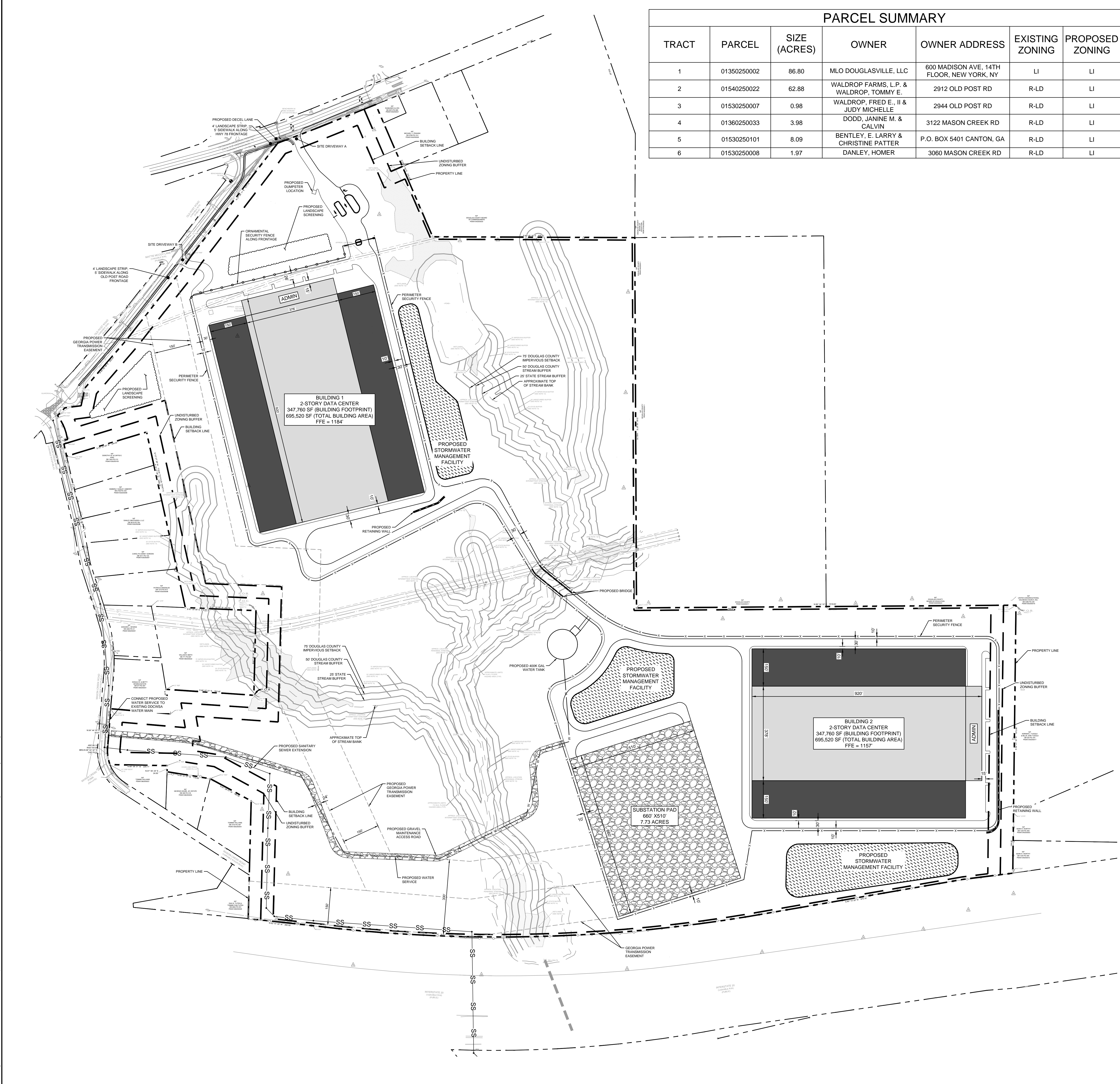
**Clifford McGrady**  
**Zoning Administrator / Project Manager**  
[cmcgrady@hram-ga.gov](mailto:cmcgrady@hram-ga.gov)  
770 943 3726 Ext. 2004 - Desk  
678 206 9824 - Cell  
[Chaplain - Hram Police Department](#)

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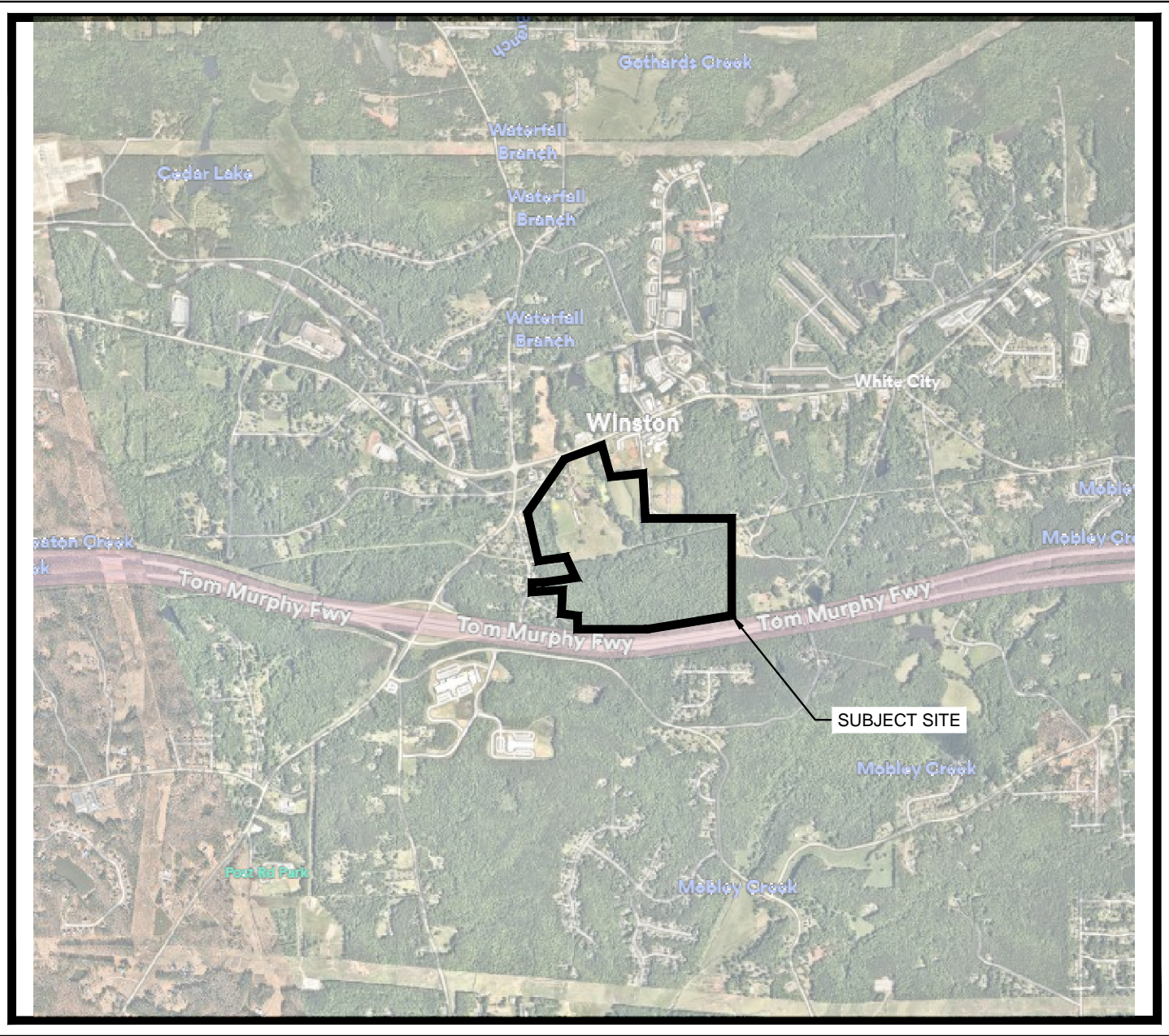
**From:** Donald Shockey <DShockey@atlantaregional.org>  
**Sent:** Monday, September 23, 2024 4:55 PM  
**To:** Cliff McGrady <cmcgrady@hram-ga.gov>; comdev@paulding.gov; sdaniels@villarica.gov; chuck.mueller@dnr.state.ga.us; gaswcc.swcd@gaswcc.ga.gov; hhill@gefa.ga.gov; Jon West



Drawing name: K:\ALP\_PR\1151989A\_Waldrop Farm DDCAD\Exhibits\2024-10-01 DRI Site Plan update\03.10 Rezoning Site Plan.dwg    Rezoning Site Plan    Oct 01, 2024 4:47pm    by: Bob Storch



PARCEL SUMMARY						
TRACT	PARCEL	SIZE (ACRES)	OWNER	OWNER ADDRESS	EXISTING ZONING	PROPOSED ZONING
1	01350250002	86.80	MLO DOUGLASVILLE, LLC	600 MADISON AVE, 14TH FLOOR, NEW YORK, NY	LI	LI
2	01540250022	62.88	WALDROP FARMS, L.P. & WALDROP, TOMMY E.	2912 OLD POST RD	R-LD	LI
3	01530250007	0.98	WALDROP, FRED E., II & JUDY MICHELLE	2944 OLD POST RD	R-LD	LI
4	01360250033	3.98	DODD, JANINE M. & CALVIN	3122 MASON CREEK RD	R-LD	LI
5	01530250101	8.09	BENTLEY, E. LARRY & CHRISTINE PATTTER	P.O. BOX 5401 CANTON, GA	R-LD	LI
6	01530250008	1.97	DANLEY, HOMER	3060 MASON CREEK RD	R-LD	LI



VICINITY MAP

DEVELOPMENT SUMMARY:

<b>SITE SUMMARY:</b>	
SITE AREA:	164.70 ACRES
PROPOSED USE:	DATA CENTER
PROPOSED BUILDING HEIGHT:	2 STORIES
BUILDING SETBACK:	
FRONT:	50FT
SIDE (AGAINST NON-RESIDENTIAL):	10FT
SIDE (AGAINST RESIDENTIAL):	100FT
REAR (AGAINST NON-RESIDENTIAL):	10FT
REAR (AGAINST RESIDENTIAL):	100FT
WATERSHED MAX IMPERVIOUS : (DOG RIVER BASIN SECONDARY AREA)	25% (50% WITH SUP PERMIT APPROVAL)
PROPOSED IMPERVIOUS AREA:	27.5% (45.22 ACRES - INCLUSIVE OF PONDS AND EXCLUSIVE OF SUBSTATION)
PROPOSED OPEN SPACE:	118.53 ACRES (72.0%) (INCLUSIVE OF PONDS AND EXCLUSIVE OF SUBSTATION)
ALL BUILDING SETBACKS ARE MEASURED FROM EXISTING RIGHT-OF-WAY LIMITS.	
DOMESTIC WATER SOURCE:	PUBLIC (DDCWSA)
SANITARY SEWER DISPOSAL:	PUBLIC (DDCWSA)
<b>PROPOSED LAND USES &amp; DENSITIES:</b>	
BUILDING 1	695,520 SF
BUILDING 2	695,520 SF
TOTAL PROPOSED DATA CENTER BUILDING AREA: 1,391,040 SF	
<b>PARKING SUMMARY:</b>	
TOTAL PROPOSED PARKING:	128 SPACES (64/BLDG)
ADA PARKING	5 SPACES

REZONING NOTES:

1. CONCEPTUAL SITE PLAN ONLY.
2. THE PROPOSED BUILDING INFORMATION SHOWN HEREON IS APPROXIMATE AND SUBJECT TO CHANGE AS DESIGN DEVELOPS.
3. IT IS UNDERSTOOD THAT THE SITE MUST COMPLY WITH ALL APPLICABLE ADA STANDARDS, INCLUDING PARKING AND CONNECTIVITY, AND WILL BE DESIGNED AND DETAILED AS SUCH.
4. EXISTING CONDITIONS SHOWN ON THIS PLAN ARE BASED OFF AERIAL INFORMATION, THE DOUGLAS COUNTY GIS SYSTEM, AND SURVEY PROVIDED.
5. THIS SITE DOES CONTAIN STATE WATERS.
6. THIS SITE DOES NOT CONTAIN A CEMETERY.

**Kimley»Horn**

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PHONE (770) 619-4280  
WWW.KIMLEY-HORN.COM

APPLICANT: TC ATLANTA  
SEE ATTACHMENT FOR  
OWNER

PROJECT  
**WALDROP FARM DC**  
OLD POST RD, WINSTON, GA 30187  
LAND LOTS 135, 136, 153 & 154  
DISTRICT 2

DRAWN BY: KHA  
DESIGNED BY: KHA  
REVIEWED BY: RTS  
DATE: 10/1/2024  
PROJECT NO.  
TITLE:  
**CONCEPT SITE PLAN**

SHEET NUMBER  
**EX - 1.0**



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

### DRI INFORMATION

**DRI Number** #4192  
**DRI Title** Vantage Data Center  
**County** Douglas County  
**City (if applicable)** N/A  
**Address / Location** 2912 Post Road

**Proposed Development Type:**

A DRI review of a proposal to construct a data center with 1,760,850 million SF of space in 2 buildings with associated support facilities on a 166-acre site at 2912 Post Road in Douglas County.

**Build Out: 2027**

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

### REVIEW INFORMATION

**Prepared by** ARC Transportation Planning Department  
**Staff Lead** Reginald James  
**Copied** Jean Hee Barrett  
**Date** September 23, 2024

### TRAFFIC STUDY

**Prepared by** NV5 Engineers and Consultants, Inc.  
**Date** July 19, 2024

## **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 1 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)*

Driveway 1 (via US 78/SR 8) is 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*)

Driveway 1 (via US 78/SR 8) is 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) [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

☒ 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

[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)
- ☐ 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.