

### DRI REGIONAL REVIEW FINDING

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

DATE: October 7, 2024

**TO**: Chairwoman Carlotta Harrell, Henry County Commission

ATTN TO: Kenta Lanham, Planner III, Henry County

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: Strickland Tract DRI 4251
Submitting Local Government: Henry County

<u>Date Opened</u>: September 23, 2024 <u>Date Closed:</u> October 7, 2024

<u>Description</u>: A DRI review of a proposal to construct a data center project with 1,253,754 SF of space in 4 buildings and associated support elements on a 250-acre partially wooded site on Strickland Road east of Simpson Mill Road in Henry County.

#### **Comments:**

#### **Key Comments**

The Atlanta Region's Plan assigns the Developing Suburbs growth management designation to the project site. 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."

The project could be better aligned with Developing Suburbs policies through retention of additional undisturbed areas around stream and wetland areas and through the dedication/management of the proposed preserved area for conservation purposes, 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 proposed zoning change raises substantial concerns about the compatibility of the development with the surrounding area and should be carefully evaluated in the context of other development goals.

Henry County water supply watershed protection measures contained in its Unified Development Code (UDC) note that the project is located within the limited development areas of two water supply watersheds. The criteria for the limited development areas in both basins include a 100-foot vegetative buffer on all streams and a 150-foot impervious setback on intermittent streams increasing to a 200-foot setback along perennial streams. Total impervious area in these areas is also subject to additional limitations. The County should ensure that all applicable water supply regulations related to stream buffers and total impervious area are met.

The project will generate a total of 1,241 daily new vehicular trips. A range of roadway modifications are proposed to address this 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 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.

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**

The project will generate a total of 1,241 daily new vehicular trips. A number of roadway modifications are proposed to address this 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 Resources Comments**

ARC's Natural Resource 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 Henry County Water Authority (HCWA). The application proposes 0.004 MGD of water supply demand and 0.004 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 HCWA 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 HCWA 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 two water supply watersheds – the Towaliga and Indian Creek water supply watersheds. Both are small (less than 100 square miles) water supply watersheds as defined under the Part 5 Criteria of the 1989 Georgia Planning Act. Henry County has established its own water supply watershed protection measures for each of its water supply watersheds in its Unified Development Code (UDC), which apply in lieu of the Part 5 Criteria of the 1989 Georgia Planning Act. Per UDC Section 3.04, Watershed Protection Areas, the project site is in the limited development areas of both watersheds. The criteria for the limited development areas in both basins include a 100–foot vegetative buffer on all streams and a 150–foot impervious setback on intermittent streams increasing to a 200–foot setback along perennial streams. Section 3.04 limits impervious surface coverage in both watersheds to 25 percent of the project property, but this can be increased to 75 percent with permanent stormwater controls as approved by the County.

The USGS coverage for the project area and the submitted site plan both show a blue-line stream running along the northeast boundary of the project property. The submitted site plan also shows a tributary to that stream starting in the center of the property and meeting the mapped stream at the property's edge. The submitted conceptual site plan shows buffers that appear to be the Henry County Stream Buffer Ordinance 50-foot undisturbed buffer and 75-foot impervious setback on both streams. No intrusions into the buffers are shown. However, if the watershed protection criteria apply, the buffer will need to be 100 feet and the setback at least 150 feet on both streams. The State 25-foot Sediment and Erosion Control buffer also needs to be shown on both streams

#### Other Environmental Comments

Additional retention of natural areas would be desirable and in keeping with regional goals regarding carbon sequestration and climate change/heat island effect mitigation. Designation of this area as managed open/conservation space could meaningfully reduce the overall impact of the project. There may be potential opportunities for linking these fragmented undeveloped areas with adjacent undeveloped or protected areas to ensure their maintenance and potential use for recreation or habitat preservation.

The project can support The Atlanta Region's Plan in general by incorporating 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 Hampton Comments

Extensive comments received from the City of Hampton are attached and include the following:

- The project is in both the Limited Development Area of Towaliga (TRWPA) and Indian Creek HCWA Watershed Protection Area (ICWPA) but the site plan only indicates TRWPA.
- Site plan does not indicate % of impervious. Within the LDA max allowed is 25% however there are provisions to increase it as shown in code below. Plan should indicate imperious coverage so that it can be evaluated as to the type of stormwater control.
- Limited development area. A limited development area is established for the remaining part of the watershed protection area that is located outside of the water quality critical area and extending to the ridge line of each watershed district.
- The proposed zoning change does not seem compatible with the project location.

#### 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." It could be better aligned through retention of additional undisturbed areas around streams, the provision of a management mechanism for the substantial amount of proposed preservation area, utilization of green infrastructure and low impact development, and allocation of some revenue generated to support conservation land acquisition elsewhere in the County. Henry 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 TRANSPORTATION
GEORGIA ENVIRONMENTAL FINANCE AUTHORITY
CITY OF LOCUST GROVE

GEORGIA DEPARTMENT OF NATURAL RESOURCE
GEORGIA REGIONAL TRANSPORTATION AUTHORITY
GEORGIA CONSERVANCY
CITY OF MCDONOUGH

GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS
GEORGIA SOIL AND WATER CONSERVATION COMMISSION
CITY OF HAMPTON
SPALDING COUNTY

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

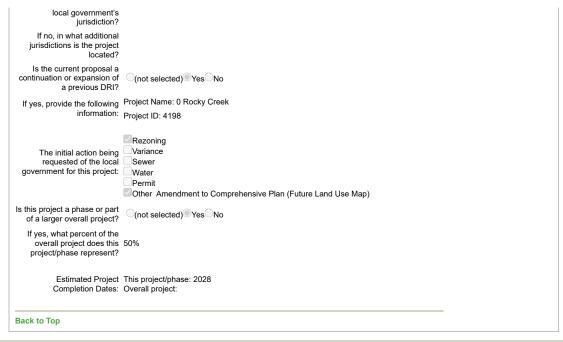




#### **Developments of Regional Impact**

DRI Home <u>Tier Map</u> <u>Apply</u> <u>View Submissions</u> <u>Login</u>

DRI #4251						
	DEVE	LOPMENT OF REGIONAL II	MPACT			
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.						
	L	ocal Government Information	on			
Submitting Local Government:	Honny					
Individual completing form: Telephone:						
·		@co.henry.ga.us				
2	- Tuai III a	@ooo).gaac				
contained herein. If a project i	s to be loc	tive completing this form is responsible ated in more than one jurisdiction and, i which the largest portion of the project is				
	ı	Proposed Project Information	on			
Name of Proposed Project:						
Location (Street Address, GPS Coordinates, or Legal Land Lot Description):		d Rd, east of Simpson Mill Rd and north	of Hampton-Locust Grove Rd			
Brief Description of Project:	1,253,75	4 sq ft Data Center				
Development Type:						
(not selected)		OHotels	Wastewater Treatment Facilities			
Office		OMixed Use	Petroleum Storage Facilities			
Commercial		Airports	Water Supply Intakes/Reservoirs			
Wholesale & Distribution		OAttractions & Recreational Facilities	OIntermodal Terminals			
Hospitals and Health Care	Facilities	Post-Secondary Schools	OTruck Stops			
Housing		Waste Handling Facilities	Any other development types			
Industrial		Quarries, Asphalt & Cement Plants				
If other development type, de	scribe:					
Project Size (# of units, floor area, etc.):	1,253,75	4 sq ft				
		DCD Properties, LLC				
Mailing Address:	1427 Eas	st 7 Street				
Address 2:						
	City:Broo	klyn State: NY Zip:11230				
Telephone:	470-893-	1698				
•		@tandh.com				
Is property owner different from developer/applicant?	(not se	elected) Yes No				
If yes, property owner:	Strickland	d Road Farms, LLC				
Is the proposed project entirely located within your	(not s	elected) Yes No				



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

DRI Site Map | Contact





#### **Developments of Regional Impact**

**DRI Home** Tier Map **Apply View Submissions** <u>Login</u>

#### **DRI #4251**

#### **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: Henry

Individual completing form: Kenta Lanham

Telephone: 7702887534

Email: klanham@co.henry.ga.us

#### **Project Information**

Name of Proposed Project: Strickland Tract

DRI ID Number: 4251

Developer/Applicant: Strickland Road Farms, LLC

Telephone: 206-724-7181

Email(s): christy@swearingenconsult.com

#### **Additional Information Requested**

Has the RDC identified any additional information

required in order to proceed with the official regional

(not selected) Yes No

review process? (If no, proceed to Economic

Impacts.)

If yes, has that additional information been provided

(not selected) Yes No

to your RDC and, if applicable, GRTA?

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

#### **Economic Development**

Estimated Value at Build-

\$1.2 Billion at Buildout

Estimated annual local tax revenues (i.e., property tax, sales tax) likely to be

\$2.7 Million at Buildout

generated by the proposed development:

Is the regional work force sufficient to fill the demand created by the proposed

(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:

Henry County Water Authority

supply denoted by the project.  2 alone The Day (MCD)?  In o, describe any plane to expand the existing water supply capacity valiable to serve the proposed project.  In o, describe any plane to expand the existing water supply capacity.  2 a safet in the extension expand the existing water supply capacity.  2 a safet in extension expand to the existing water supply capacity.  2 a safet in the extension expand to the existing water supply capacity.  3 a safet in the extension expand to the existing water supply capacity.  Wastewater Disposal  Variety of this in the extension expand to the extension expand to the proposal existing wastewater treatment capacity.  3 a sever time extension expand existing wastewater treatment capacity.  5 a sever time extension expand to expand existing wastewater treatment capacity.  5 a sever time extension expand to expand existing wastewater treatment expanding to the proposal expand to expand existing wastewater treatment expanding to the proposal expanding	What is the estimated water		
salicione New Exercision application Service from describe any plans to expand the existing water supply capacity: s a water in ine extension against to serve this (not selected) "Yes" No  Wastewater Disposal  Name of wastewater readment provider for this tate: Henry County Water Authority selected in Millions of allouisons Per Day McDD? sufficient wastewater readment capacity available (not selected) "Yes" No asswer this proposed from the selected of the selected	supply demand to be generated by the project,	0.004	
Associated and plans to expand the existing water supply capacity:  as water fine octonation expand the existing water supply capacity:  as water fine octonation expand the existing water supply capacity:  as water fine octonation expand the existing water supply capacity:  (post selected) Yes No required?  Wastewater Disposal  Want of wastewater expand to the extended existing water supply capacity:  Wastewater Disposal  Want of wastewater expand to the expand to the expand to the expand to the proposed project?  Wastewater Disposal  Wastewater Dis	Gallons Per Day (MGD)?		
sa water line extension equired to serve this cryate?"  Wastewater Disposal  Name of restricted restricted restricted by the required restricted by the project, and the project restricted by the proje	capacity available to serve the proposed project?	(not selected) Yes No	
Wastewater Disposal  Wanter of wastewater statement provider for this letter of wastewater provider for this letter of wastewater statement provider for this letter of wastewater statement provider for this letter of wastewater statement provider for this letter of wastewater stateways from the project, and the project, and the project of wastewater stateways from the project, and the project of wastewater stateways from the project, and the project of wastewater stateways from the project of wasteways from the project of wastewater stateways from the project of wasteways from the project of wa	If no, describe any plans to e	expand the existing water supply capacity:	
Wastewater Disposal  Name of wastewater reatment provider for this lete:  Name of wastewater reatment provider for this lete:  Name of wastewater reatment provider for this lete:  Name of wastewater reatment capacity services of a sufficient wastewater reatment capacity available or serve this proposed or one of this proposed proposed.  **Common of this proposed or one of this proposed proposed.**  **Common of this proposed.**  **Common of this proposed proposed.**  **Common of this proposed proposed.*	Is a water line extension required to serve this project?	(not selected) Yes No	
What is the estimated by the project, measured in Millions of Callons Per Day (MGD)?  So sufficient wasterdard reactions and project of the p		line (in miles) will be required?	
What is the astimated sewage flow to be generated by the project, measured in Millins of Jaillons Per Day (MOJ)?  set efficient wastwater reatment capacity available on serve this proposed or oever this project or serve this project?  In o, describe any plans to expand existing wastewater treatment capacity;  as a sewer line extension equired to serve this proposed or oever this project?  In o, describe any plans to expand existing wastewater treatment capacity;  as a sewer line extension equired to serve this project of the past hour of the pa		Wastewater Disposal	-
Allow much traffic volume is special by the propect was been proposed by the propect was been propected by the propected by t	Name of wastewater		
pervaled by the project, measured in Millions of Salidines Per Day (MGD)?  s sufficient wastewater reatment capacity: s a sever line extension equired to serve this proposed royee?  I no, describe any plans to expand existing wastewater treatment capacity: s a sewer line extension equired to serve this proposed royee?  I no, describe any plans to expand existing wastewater treatment capacity: s a sewer line extension equired to serve this proposed royee?  I no, describe any plans to expand existing wastewater treatment capacity: s a sewer line extension equired to serve this proposed royee?  Land Transportation  Land Transportation	treatment provider for this site:	Henry County Water Authority	
inseasured in Millions of Sallonis Per Day (MCD)?  sufficient wastewater restament capacity available os even this proposed roycer?  fino, describe any plans to expand existing wastewater treatment capacity:  s a sewer line extension required to serve this roycer?  fyes, how much additional line (in miles) will be required?  Land Transportation  Town much traffic volume is expected to be generated development, in peak hour of volume is parallable, elease provide.)  as a traffic study been performed to determine whether or not will be needed to serve this project?  (not selected) Yes No provided in the project of yes, please describe below:  Solid Waste Disposal  Town much solid waste is the project?  fyes, please describe below:  Solid Waste Disposal  Town much solid waste is the project?  for o, describe any plans to expand existing landfill capacity:  Will any hazardous waste be generated by the levelopment?	sewage flow to be		
reatment capacity available one serve this proposed and existing wastewater treatment capacity:  s a sewer line extension equired to serve this orgoect?  I cont selected) Yes No royect?  Land Transportation  Land Transportation  How much traffic volume is expected to be generated by the proposed fevelopment, in peak hour sold waste measure of volume is available, blease provide.  Land Transportation  1.241 24-Hour 2-way Trips, 157 AM peak 2-way & 132 PM 2way  1.241 24-Hour 2-way Tr	generated by the project, measured in Millions of Gallons Per Day (MGD)?	0.004	
o serve this proposed control of the selected of the control of th	Is sufficient wastewater treatment capacity available.		
s a sewer line extension required to serve this onequired to serve this onequired to serve this onequired?  Land Transportation  Land T	to serve this proposed project?	(not selected) Yes No	
required to serve this project?  Land Transportation  Land Transportatio	If no, describe any plans to e	expand existing wastewater treatment capacity:	
Land Transportation  How much traffic volume is expected to be generated by the proposed fevelopment, in peak hour chickle trips per day? (If only an alternative measure of volume is available, please provide,) Has a traffic study been performed to determine whether or not ransportation or access mprovements will be needed to serve this project?  Are transportation mprovements needed to (not selected) Yes No exerve this project?  Fyes, please describe below:  Solid Waste Disposal  How much solid waste is the project expected to generate annually (in tons)?  s sufficient landfil capacity available to serve this propect?  f no, describe any plans to expand existing landfill capacity:  Will any hazardous waste generated by the levelopment?	Is a sewer line extension required to serve this project?	(not selected) Yes No	
How much traffic volume is expected to be generated by the proposed development, in peak hour development, in peak hour vehicle trips per day? (If only an alternative measure of volume is available, clease provide.)  Has a traffic study been performed to determine whether or not manaportation or access manaportation or manaportation or access manaportation or manaportation or access mana	If yes, how much additional li	ine (in miles) will be required?	
How much traffic volume is expected to be generated by the proposed development, in peak hour development, in peak hour vehicle trips per day? (If only an alternative measure of volume is available, clease provide.)  Has a traffic study been performed to determine whether or not manaportation or access manaportation or manaportation or access manaportation or access manaportation or access manaportation or access manaportation manaportation or access manaportation manaportation or access manaportation or			-
expected to be generated by the proposed levelopment, in peak hour probled trips per day? (If only an alternative measure of the problem of t		Land Transportation	
of volume is available, oblease provide.)  -las a traffic study been performed to determine whether or not ransportation or access improvements will be needed to serve this project?  Are transportation improvements needed to serve this project?  I yes, please describe below:  Solid Waste Disposal  -low much solid waste is the project expected to penerate annually (in tons)? I sufficient landfill capacity available to serve this proposed project?  I no, describe any plans to expand existing landfill capacity:  Will any hazardous waste be generated by the development?  I describe a traffil capacity available to serve this proposed project?  I no, describe any plans to expand existing landfill capacity:  No describe any plans to expand existing landfill capacity:	How much traffic volume is expected to be generated by the proposed development, in peak hour vehicle trips per day? (If	1,241 24-Hour 2-way Trips, 157 AM peak 2-way & 132 PM 2way	
whether or not ransportation or access mprovements will be needed to serve this project?  Are transportation mprovements needed to serve this project?  Solid Waste Disposal  How much solid waste is the project expected to generate annually (in tons)? s sufficient landfill capacity available to serve this proposed project?  In o, describe any plans to expand existing landfill capacity:  Will any hazardous waste be generated by the development?	of volume is available, please provide.)		
mprovements will be needed to serve this project?  Are transportation mprovements needed to serve this project?  If yes, please describe below:  Solid Waste Disposal  How much solid waste is the project expected to 1,000,000 generate annually (in tons)?  If yes a sufficient landfill capacity available to serve this proposed project?  If no, describe any plans to expand existing landfill capacity:  Will any hazardous waste be generated by the development?  In the transportation (not selected) Yes No describe any plans to expand existing landfill capacity:  If no, describe any plans to expand existing landfill capacity:  If no, describe any plans to expand existing landfill capacity:  If no, describe any plans to expand existing landfill capacity:  If no, describe any plans to expand existing landfill capacity:  If no, describe any plans to expand existing landfill capacity:  If no, describe any plans to expand existing landfill capacity:  If no, describe any plans to expand existing landfill capacity:  If no, describe any plans to expand existing landfill capacity:  If no, describe any plans to expand existing landfill capacity:  If no, describe any plans to expand existing landfill capacity:  If no, describe any plans to expand existing landfill capacity:  If no, describe any plans to expand existing landfill capacity:  If no describe any plans to expand existing landfill capacity:  If no describe any plans to expand existing landfill capacity:  If no describe any plans to expand existing landfill capacity:  If no describe any plans to expand existing landfill capacity:  If no describe any plans to expand existing landfill capacity:  If no describe any plans to expand existing landfill capacity:  If no describe any plans to expand existing landfill capacity:  If no describe any plans to expand existing landfill capacity:  If no describe any plans to expand existing landfill expansion any plans to expand existing landfill expansion any plans to expand existing landfill expansion any plans to expansion any plans	Has a traffic study been performed to determine whether or not		
mprovements needed to serve this project?  f yes, please describe below:  Solid Waste Disposal  How much solid waste is the project expected to 1,000,000 generate annually (in tons)?  s sufficient landfill capacity available to serve this proposed project?  f no, describe any plans to expand existing landfill capacity:  Will any hazardous waste be generated by the development?  (not selected) Yes No describe any plans to expand existing landfill capacity:	transportation or access improvements will be needed to serve this project?	(not selected) Yes No	
Solid Waste Disposal  How much solid waste is the project expected to 1,000,000 generate annually (in tons)?  s sufficient landfill capacity available to serve this proposed project?  If no, describe any plans to expand existing landfill capacity:  Will any hazardous waste be generated by the development?  (not selected) Yes No development?	Are transportation improvements needed to serve this project?	(not selected) Yes No	
How much solid waste is the project expected to 1,000,000 generate annually (in tons)?  s sufficient landfill capacity available to serve this proposed project?  If no, describe any plans to expand existing landfill capacity:  Will any hazardous waste be generated by the development?  In our part of the project of the p	If yes, please describe below	r.	
project expected to 1,000,000 generate annually (in tons)? s sufficient landfill capacity available to serve this proposed project? (not selected) Yes No proposed project?  If no, describe any plans to expand existing landfill capacity:  Will any hazardous waste be generated by the development? (not selected) Yes No development?		Solid Waste Disposal	-
project expected to 1,000,000 generate annually (in tons)? s sufficient landfill capacity available to serve this proposed project? (not selected) Yes No proposed project?  If no, describe any plans to expand existing landfill capacity:  Will any hazardous waste be generated by the development? (not selected) Yes No development?	How much solid wasta is the		
wailable to serve this proposed project?  If no, describe any plans to expand existing landfill capacity:  Will any hazardous waste be generated by the development?  (not selected) Yes No development?	How much solid waste is the project expected to generate annually (in tons)?		
Will any hazardous waste be generated by the (not selected) Yes No development?	Is sufficient landfill capacity available to serve this proposed project?	(not selected) Yes No	
pe generated by the(not selected)_Yes_No development?	If no, describe any plans to e	expand existing landfill capacity:	
pe generated by the(not selected)_Yes_No development?	Will any hazardous waste		
f yes, please explain:	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 25% proposed development has been constructed?

Environmental Quality  Is the development located within, or likely to affect any of the following:					
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 q	juestion above, describe how the identified resource(s) may be affected:				
, , , , , , , , , , , , , , , , , , , ,	County regulations regarding the protection of water supply sheds.				

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

DRI Site Map | Contact

#### STRICKLAND TRACT DRI

# Henry County Natural Resources Review Comments October 1, 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 Henry County Water Authority (HCWA). The application proposes 0.004 MGD of water supply demand and 0.004 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 HCWA 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 HCWA 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 two water supply watersheds – the Towaliga and Indian Creek water supply watersheds. Both are small (less than 100 square miles) water supply watersheds as defined under the Part 5 Criteria of the 1989 Georgia Planning Act. Henry County has established its own water supply watershed protection measures for each of its water supply watersheds in its Unified Development Code (UDC), which apply in lieu of the Part 5 Criteria of the 1989 Georgia Planning Act. Per UDC Section 3.04, Watershed Protection Areas, the project site is in the limited development areas of both watersheds. The criteria for the limited development areas in both basins include a 100-foot vegetative buffer on all streams and a 150-foot impervious setback on intermittent streams increasing to a 200-foot setback along perennial streams. Section 3.04 limits impervious surface coverage in both watersheds to 25 percent of the project property, but this can be increased to 75 percent with permanent stormwater controls as approved by the County.

#### **Stream Buffers**

The USGS coverage for the project area and the submitted site plan both show a blue-line stream running along the northeast boundary of the project property. The submitted site plan also shows a tributary to that stream starting in the center of the property and meeting the mapped stream at the property's edge. The submitted conceptual site plan shows buffers that appear to be the Henry County Stream Buffer Ordinance 50-foot undisturbed buffer and 75-foot impervious setback on both streams. No intrusions into the buffers are shown. However, if the watershed protection criteria apply, the buffer will need to be 100 feet and the setback at least 150 feet on both streams. The State 25-foot Sediment and Erosion Control buffer also needs to be shown on both streams

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.

Strickland Tract DRI ARC Natural Resources Comments Page Two October 1, 2024

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

Given the large water demands associated with data centers, we recommend working with the Henry 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 (<a href="https://www.georgiastormwater.com">www.georgiastormwater.com</a>) 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: Wanda Moore

To: Donald Shockey; chuck.mueller@dnr.state.ga.us; gaswcc.swcd@gaswcc.ga.gov; hhill@gefa.ga.gov; Jon West;

kmoore@gaconservancy.org; nongame.review@dnr.ga.gov; slucki@gefa.ga.gov; Zane Grennell - Georgia DCA; Amy Goodwin; Andrew Smith; Ansley Goddard; Arin Yost; Danny Johnson; David Haynes; Eleanor Swensson; Jillian Willis; Jim Santo; Jim Skinner; Jonathan Philipsborn; Kristin Allin; Lauren Blaszyk; Mike Alexander; Mike Carnathan; Ranata Mattison; Reginald James; Roshani Thakore; Samyukth Shenbaga; Sidney Douse; Wei Wang; Abbie Dean; Brittany Williams; achood@dot.ga.gov; chrobinson@dot.ga.gov; ciames@dot.ga.gov; cwoods@dot.ga.gov;

"cyvandyke@dot.ga.gov"; "davinwilliams@dot.ga.gov"; eregis@dot.ga.gov; glynch@hntb.com;

jomcloyd@dot.ga.gov; mcanizares@dot.ga.gov; mfowler@dot.ga.gov; MWeiss@dot.ga.gov; mwilson@dot.ga.gov; nrogers@dot.ga.gov; ppeevy@dot.ga.gov; Abdul Amer; Naser Omer; Victor Garcia; Christy Swearingen; Scott Greene; David Simmons; Steve Cariola; Shamsul Baker; Wilkerson, Donald; Kamau As-Salaam; Kenta Lanham;

<u>Toussaint Kirk; civespowell@dot.ga.gov; Daniel J. Trevorrow - GDOT District 3; tpeek@dot.ga.gov; creese@spaldingcounty.com; emorales@spaldingcounty.com; sellington@spaldingcounty.com; sledbetter@spaldingcounty.com; sredic@spaldingcounty.com; Charles Reese; Christy Taylor; Mike Clark; Charles Reese; Christy Taylor; Charles Reese; Christy Taylo</u>

BFoster@locustgrove-ga.gov; dgibbs@locustgrove-ga.gov; Karis Trimble; Tim Young RE: 2024 Strickland Tract DRI 4251 - Preliminary Report and Comments Request

Subject: RE: 2024 Strickland Tract DRI 4251 - Prelimir Date: Monday, September 23, 2024 7:29:15 PM

Attachments: image001.pnq

image005.png image004.png

image006.png Future land Use Map (FLUM) .pdf RURAL COMMUNITIES.pdf

RURAL COMMUNITIES AT A GLANCE.pdf DEVELOPMENT FEELS UNPREDICTABLE.pdf

#### Donald,

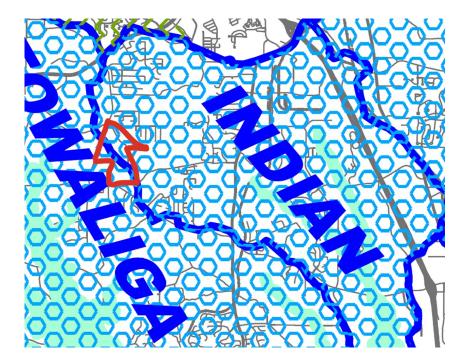
Thank you for the opportunity to comment as a neighboring jurisdiction located within Henry County.

The project is in <u>both</u> the Limited Development Area of Towaliga (TRWPA) and Indian Creek HCWA Watershed Protection Area (ICWPA).

Site plan only indicates TRWPA. (See general outline in red for property boundary image below. Hexagon indicates limited development area.) Note that the site plan is oriented with north to the left. Vicinity map shows site as image below, north straight up.

Site plan does not indicate % of impervious. Within the LDA max allowed is 25% however there are provisions to increase it as shown in code below. Plan should indicate imperious coverage so that it can be evaluated as to the type of stormwater control.

Limited development area. A limited development area is established for the remaining part of the watershed protection area that is located outside of the water quality critical area and extending to the ridge line of each watershed district.



- If a perennial stream abuts or crosses any property within the limited development area described in section 3.04.05, specific regulations apply (see Table 3.04.09).
  - o 3.04.09. Hazardous materials handling. New facilities located within the watershed protection area that handle hazardous materials of a type and amounts requiring a permit from the Georgia DNR or that require disposal by a hazardous materials handler permitted or licensed by the Georgia DNR at a hazardous materials facility, shall perform their operations on impermeable surfaces having spill and leak collection systems. Such spill and leak collections systems shall be shown on the development plan in detail and shall be approved pursuant to procedures for development plan approval set forth in subsection 12.02.02.E.6.

#### LDA (Limited Development Area) Uses

- (O/I) Shopping, business, or trade (See table 3.04.10)
- (O/I) Social, institutional, or infrastructure related (See table 3.04.10)
- Hazardous or toxic materials storage, disposal, use or generation (except handling as regulated in section 3.04.09) (Prohibited) (Not sure but EPD will permit and evaluate storage and disposal of water from cooling tanks is toxic and/or provisions for fail safe system. Only mention it as toxic is use or generation is stated as prohibited use.)
  - The word "toxic" as herein used shall mean any chemical or substance that has

been defined as toxic by the Environmental Protection Agency of the United States (E.P.A.), environmental protection department of the state (E.P.D.), or the department of agriculture of the state (A.D.).

- 3.04.10. Site design standards for specific uses in watershed protection areas.
   Proposed development shall comply with both the standards for watershed protection areas and the standards for the zoning district in which the proposed development is located.
- All uses: Minimum setback of buildings and all impervious surfaces from normal pool level of surface water = 150 ft.
- Surface Water Buffers within LDA = 100 ft. both sides of any surface water
   measured from the banks. (Did not see label indicating width of buffer provided.)
- Maximum impervious surface coverage = 25% (Not shown on the plan)
- The impervious surfaces for industrial, commercial, offices, institutional, public, and multifamily residential development within the limited development area may be increased up to seventy-five (75) percent impervious surfaces. 1.All permanent stormwater control structures and easements for maintenance and access shall be recorded in the final plat of the property in accordance with the procedures set forth in subsection 12.02.03.

Zoning: Applicant is proposing to rezone the site to OI. Attached FLUM. Definition ULDC.

2.01.03. Commercial, office and institutional zoning districts.

A. OI: Office-institutional district. This district is intended to provide for the development of a complimentary mix of business, professional and institutional activities that are compatible with the primary purpose of this district. Limited retail uses normally associated with office or institutional uses, accessory structures, and essential public services are also permissible.

Note: There are no OI clusters in the vicinity of the proposed project. See attached FLUM.

Development regs. OI = Max. ht. for new development is <u>unlimited</u>. This detail should be shown on the plan and discussed as to the visual impact of the rural area.

Additionally, the long building façade along Simpson Mill Road will be quite altering for

the rural character of the area. The building length is 1,661' which is 0.31 miles.

What is the elevation of Simpson Mill Road? Maybe 910 at midpoint of building, ask applicant approx. FFE of Building and Ht. of building proposed. A 50' buffer planted of evergreen material will never screen this building if it sits at the same elevation as the road and is allowed an unlimited height per the zoning regulations.

Does this rezoning require a comprehensive plan update to run concurrently with the zoning application? Appears if master planned and OI has a vegetative buffer to protect the rural character which would be along Simpson Mill, Walker Drive, and HLG Rd maybe considered appropriate. This appears to be a single, gated use. Not sure if it is or will be integral, appropriate to the neighboring uses and overall character of the area. This determination that adding a buffer to a completely different land use in an established area somehow makes it an appropriate use is an interesting approach. It provides a wide range of possibilities across the county, I'm not sure the impact is comprehended. This is a single use zoning, fragmented, and dependent solely on the automobile for transportation, gated with no interconnectivity, pedestrian trails, (that are apparent) to promote any type of cohesiveness.

GOAL: Improve Land Use Policies, see attached. This feels like the 20% deviation from the FLUM mentioned HC Comp Plan.





<!--[if !vml]--><!--[endif]--> **Wanda D. Moore, PLA** | Director of Community Development

City of Hampton | 17 East Main Street South | Hampton, GA 30228

Phone: (770) 946-4306 ext. 2229 | Direct : (678) 588-9129

Email: wmoore@hamptonga.gov | Website: www.hamptonga.gov

#### DISCLAIMER:

Information contained herein has been researched as requested and provided as a public service. Information contained herein is believed to be accurate and is based upon or relates to the information supplied by the requestor. Information contained herein does not exempt a developer, builder, or property owner from any required review and/or approval required by other City of Hampton Departments, from private development covenants, and/or any other code/development regulations. Planning & Zoning can only provide information relating to zoning and permitted uses as approved by Mayor and Council. Community Development cannot give guidance or approvals regarding compliance required by other departments. Appropriate research and due diligence are strongly recommended before acquiring property for specific use. Community Development assumes no liability for errors and omissions. Information contained herein has been obtained from public records, which may be inspected during regular business hours.

## DATA CENTER CAMPUS - HENRY COUNTY **EXISTING** 2160 KINGSTON COURT, SUITE O; MARIETTA, GA 30067 PROPOSED SITE ±242 ACRES 5553 PEACHTREE ROAD, SUITE 175; ATLANTA, GA 30341 LOCATION MAP LOCATION: 276 STRICKLAND RD, MCDONOUGH, GA 30253 059-01043000, 059-01017001 (CEMETERY) LAND LOTS: 239 & 240 - 3RD DISTRICT - HENRY COUNTY, GA LAND LOTS: 241 & 242 - 6TH DISTRICT - HENRY COUNTY, GA 249.8 ACRES WATER TANKS LINEAR FOOTAGE (SIMPSON MILL RD): 3,300 FEET 1,600 FEET **PROPOSED** SECONDARY/ **EMERGENCY** RA (AGRICULTURAL/RES.) ENTRANCE OI (OFFICE INSTITUTIONAL) PROVIDED: EXISTING WATER MAIN PROVIDED: **TOTAL PRESERVED OPEN SPACE AREA**: 75 ACRES 253,377 G.S.F. 506,754 G.S.F. 373,500 G.S.F. EXISTING **WETLANDS** 747,000 G.S.F. 31,600 S.F. PROPOSED TOTAL BUILDING (1-4) AREA (G.S.F.) - 320 MW: 1,253,754 S.F. **PRIMARY** 11.52% **ENTRANCE** 1,152: 10,000 39 SPACES PER BUILDING PROPOSED TOTAL SPACES = 156 PROPERTY LINE FENCE

CONCEPTUAL SITE LAYOUT EXHIBIT STRICKLAND TRACT HENRY COUNTY, GA

**DRI NUMBER:** 

RED WOLF PROPERTIES DCD LLC

TRAFFIC CONSULTANT

ABDUL AMER, PE, PTOE

TEL: 770-690-9255

**CIVIL ENGINEER** 

THOMAS & HUTTON

TEL: 470-893-1698

TOTAL SITE AREA:

LINEAR FOOTAGE

EXISTING ZONING:

PROPOSED ZONING:

ZONING:

REQUIRED:

REQUIRED:

BUILDING (1&2):

BUILDING (3&4):

TOTAL OFFICE AREA:

PERCENTAGE FLOOR AREA:

REQUIRED:

27 SPACES PER BUILDING

PROTECTION DISTRICT.

TOTAL SPACES= 108

**FLOOR AREA RATIO:** 

TOTAL PARKING REQUIREMENTS:

REFERENCE CODE: 2.01.03-A

THIS SITE IS WITHIN THE TOWALIGA WATERSHED

BUFFER REFERENCE CODE: 5.02.03

e: greene.s@ tandh.com

LINEAR FOOTAGE (WALKER DR):

(HAMPTON LOCUST GROVE RD):

SETBACK REQUIREMENTS:

FRONT YARD SETBACK: 50 FEET

SIDE YARD SETBACK: 15 FEET

REAR YARD SETBACK: 20 FEET

PROPOSED BUILDINGS: (4) TOTAL

BLDG. (1&2) AREA PER BLDG (G.S.F.):

BUILDING (1&2) TOTAL AREA (G.S.F.):

BLDG. (3&4) AREA PER BLDG (G.S.F.):

BUILDING (3&4) TOTAL AREA(G.S.F.):

1 STORY

1 STORY -

**BUFFER REQUIREMENTS:** 

OI TO RA BUFFER: 40 FEET

SITE INFORMATION

SCOTT GREENE

A&R ENGINEERING, INC.

1427 EAST 7 STREET; BROOKLYN, NY 11230

PARCEL NUMBER: 059-01017000, 059-01017002,

500 FEET

50 FEET

40 FEET

40 FEET

40 FEET

- 128 MW

192 MV

PROVIDED:

**DEVELOPER** 

MAY 20, 2024



5553 Peachtree Road • Suite 175 Chamblee, GA 30341 • 470.893.1700

www.thomasandhutton.com

purposes only, does not limit or bind the owner/developer, and is subject to change and revision without prior written notice to the holder. Dimensions, boundaries and position locations are for illustrative purposes only and are subject to an accurate

COPYRIGHT © 2023 THOMAS & HUTTON

