

DATE: MARCH 14, 2025

TO: Chairwoman Romona Jackson Jones, Douglas County Commission  
ATTN TO: Austin Cronan, Zoning Administrator, Douglas County  
RE: Development of Regional Impact Review  
FROM: Mike Alexander, COO, Atlanta Regional Commission

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

**Name of Proposal:** Lithia Springs Data Center DRI 4326

**Submitting Local Government:** Douglas County

**Date Opened:** February 26, 2025 **Comments Due:** March 13, 2025 **Date to Close:** March 14, 2025

**Description:**

A DRI review of a proposal to construct a data center with a total of 1,302,176 SF of space in 4 buildings along with an electrical substation and supporting facilities on a 81.7-acre site at the intersection of Thornton Road and Factory Shoals Road in Douglas County.

**Key Comments**

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

*A portion of this project was previously reviewed in 2023 as Lithia Springs Data Center DRI 4087 which proposed to construct two three-story data center buildings with a total square footage of 878,886 SF along with ancillary support elements on a 44-acre currently wooded site. The current proposal expands the site to 82 acres and the total development to 1,302,176 SF of space in 4 buildings along with an electrical substation and supporting elements.*

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

*projected annual \$21.5 million in Douglas County property tax revenue generated to support conservation land acquisition and tree planting elsewhere in the County.*

*The project is expected to generate approximately 1,660 daily new vehicular trips.*

*The project is approximately 4 miles from the Fulton County Executive Airport/Charlie Brown Field (FTY), and directly within the approach surface to Runway 8, and needs to be studied by the FAA.*

### **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 11-county metro region to ensure that required infrastructure and resources are in place to support continued economic development and prosperity. The Plan assigns a relevant growth management category designation to all areas in the region- Established Suburbs for this project - and provides accompanying growth policy recommendations which are detailed at the end of these comments.

A portion of this project was previously reviewed in December 2023 as Lithia Springs Data Center DRI 4087 which proposed to construct two three-story data center buildings with a total square footage of 878,886 SF along with ancillary support elements on a 44-acre currently wooded site. This proposal expands the site to 82 acres and the total development to 1,302,176 SF of space in 4 buildings along with an electrical substation and supporting elements.

### **Transportation and Mobility Comments**

The project is projected to generate 1660 daily new vehicular trips. Care should be taken to ensure that the development, as constructed, promotes an interconnected, functional, clearly marked and comfortable pedestrian experience on all driveways, paths, entrances, and parking areas. To the maximum extent possible, new driveways and intersection corners where pedestrians will cross should be constructed with minimal curb radii to reduce speeds of turning vehicles and decrease crossing distances for pedestrians.

### **GDOT Aviation Comments**

Comments received from GDOT Aviation are attached.

### **Douglas County DOT Comments**

Comments received from Douglas County Transportation are attached.

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

ARC Natural Resources Group Comments are attached. ARC recognizes that energy demands will be very high for this project and that related water needs for cooling purposes may create a large peak demand from the

Douglasville–Douglas County Water and Sewer Authority. The application proposes 0.062 MGD of water supply demand and 0.034 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 Douglasville–Douglas County Water and Sewer Authority 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 Douglasville–Douglas County Water and Sewer Authority 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.

#### *Drought Management Planning*

ARC recommends that Douglasville–Douglas County Water & Sewer Authority review its existing Drought Management Plan and update as needed to account for the prioritized water management requirements of data centers. Having a planned and organized drought response may help delay or avoid the need to implement more stringent water use restrictions and avoid harmful economic hardships.

#### *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 Department has identified County and State regulations that could apply to this property. Other regulations may also apply that we have not identified.

#### *Watershed Protection*

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

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

As stated above, there are no specific Part 5 Criteria for buffers or impervious surface limits in large (over 100 square miles) water supply watersheds such as Sweetwater Creek Water Supply Watersheds. However, the Part 5 Criteria do place restrictions on hazardous waste handling, storage and disposal within seven miles upstream of a public water supply intake. This project is within seven miles upstream of the City of East Point Intake on Sweetwater Creek.

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

### *Stream Buffers*

The USGS coverage for the project area and the submitted site plan both show a blue-line branch of an unnamed tributary to Sweetwater Creek with headwaters starting in the southwestern corner of the project property and flowing to the west. The project is within the Douglas County Sweetwater Creek/ East Point Intake Basin subwatershed, with the basic requirement of a 150-foot impervious surface setback and a 100-foot undisturbed buffer on all streams but allows for 25% reductions to a 112.5-foot impervious setback and a 75-foot undisturbed buffer with an administrative variance. The submitted site plan shows the 112.5-foot impervious setback and a 75-foot undisturbed buffer, both noting the 25% reduction through administrative variances. The 25-foot State Sediment and Erosion Control buffer is also shown. No buffer or setback intrusions are shown for the portion of the project under review.

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.

### *Floodplain*

The FEMA coverage for the project area shows no floodplain on the project property.

### **Other Environmental Comments**

As the limited remaining forested and natural areas of the Atlanta region continue to be developed at a rapid pace while warmer temperatures and more extreme weather events increase in frequency, there is a need to carefully plan for the future to ensure the retention and proper management of an optimal amount of these critical environmental assets. Most of the site's 82 acres, which are heavily wooded and provide extensive stormwater, air quality, and urban cooling benefits, will be cleared for the project which is not supportive of regional land use and environmental policies.



The project is located within close proximity to Sweetwater Creek State Park – the most visited state park in the state – to the west and is within the Sweetwater Creek Water Supply Watershed. While much of the wooded natural area to the east of the site has recently been developed for industrial use, development of the remaining wooded area west of the site up to the border of the State park with uses compatible with the area's natural character defined by forests and streams would be supportive of regional environmental and water resource policies.

The project can support The Atlanta Region's Plan in general by incorporating other aspects of regional environmental policy, including green infrastructure and/or low-impact design, e.g., pervious pavers, rain gardens, vegetated swales, etc., in parking areas and site driveways, and as part of any improvements to site frontages.

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

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

Preservation of existing single-family neighborhoods is important, and wholesale change will most likely not occur in the single-family subdivisions that make up a majority of these areas. However, infill and redevelopment will occur in areas of retail/commercial concentrations, especially commercial corridors.

The proposed project is not aligned with Established Suburbs policies which focus on preserving existing single-family development and promoting compatible infill development. More importantly, the project is not aligned with regional land use and environmental policies which encourage the retention of forested greenfield areas and avoidance of water resource impacts. It could be better aligned with these policies by preserving additional wooded area and allocating of some of the projected annual \$21.5 million in Douglas County property tax revenue generated to support conservation land acquisition and tree planting elsewhere in the County. Douglas County leadership and staff, along with the applicant team, should collaborate closely to ensure maximum 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 DEPARTMENT OF NATURAL RESOURCE  
GEORGIA REGIONAL TRANSPORTATION AUTHORITY

GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS  
GEORGIA SOIL AND WATER CONSERVATION COMMISSION

GEORGIA ENVIRONMENTAL FINANCE AUTHORITY  
CITY OF DOUGLASVILLE

GEORGIA CONSERVANCY

DOUGLAS 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

[DRI Home](#)
[Tier Map](#)
[Apply](#)
[View Submissions](#)
[Login](#)

### DRI #4326

#### 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: Austin Cronan  
 Telephone: 678-838-2060  
 E-mail: [acronan@douglascountygga.gov](mailto:acronan@douglascountygga.gov)

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

#### Proposed Project Information

Name of Proposed Project: Lithia Springs Data Center  
 Location (Street Address, GPS Coordinates, or Legal Land Lot Description): Land Lots 0706, 0707, District 18, Section 2, being parcels: 0706-182-0010, 0706-182-0011, 0707-182-0011, 0707-182-0012  
 Brief Description of Project: Expansion of previously reviewed DRI 4087; addition of 1, two-story data center, 98,015 sq. ft./floor (196,030 sq. ft. total), addition of 1, two-story data center, 113,630 sq. ft./floor (227,260 sq. ft. total), addition of a substation and two water storage tank areas

#### 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.): Two data center buildings, one 196,030 sq. ft. & one 227,260 sq. ft. for a total of 423,290 sq. ft.,

Developer: SAC III Acquisition Co., LLC

Mailing Address: 1700 Broadway, Suite 1750

Address 2: N/A

City: Denver State: CO Zip: 80290

Telephone: 289-925-6464

Email: [gsobti@stackinfra.com](mailto:gsobti@stackinfra.com)

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

If yes, property owner: Various parcels; assemblage into one site

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?

If yes, provide the following information:

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

Is this project a phase or part of a larger overall project?

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

Estimated Project Completion Dates:

Project Name: Lithia Springs Data Center

Project ID: 4087

☒ Rezoning

☐ Variance

☐ Sewer

☐ Water

☐ Permit

☐ Other

(not selected) Yes No

33% if by total square footage; 46% if by acreage

This project/phase: Not Disclosed

Overall project: Not Disclosed; Previous Phase May 2026

[Back to Top](#)



## Developments of Regional Impact

[DRI Home](#)
[Tier Map](#)
[Apply](#)
[View Submissions](#)
[Login](#)
**DRI #4326**

### 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: Austin Cronan

Telephone: 678-838-2060

Email: acronan@douglascountygga.gov

#### Project Information

Name of Proposed Project: Lithia Springs Data Center

DRI ID Number: 4326

Developer/Applicant: SAC III Acquisition Co., LLC

Telephone: 289-925-6464

Email(s): gsobti@stackinfra.com

#### Additional Information Requested

Has the RDC identified any additional information required in order to proceed with the official regional review process? (If no, proceed to Economic Impacts.) ☐ (not selected) ☐ Yes ☒ No

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

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

#### Economic Development

Estimated Value at Build-Out: \$2,400,000,000

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

\$21,500,000

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):

13 single-family homes

#### Water Supply

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

What is the estimated water supply demand to be generated by the project,

0.062 MGD

measured in Millions of Gallons Per Day (MGD)?

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

If no, describe any plans to expand the existing water supply capacity:

DDCWSA is working with several, surrounding developments on a project to provide a new water tank and pump to provide additional pressure within the public system to accommodate this and the surrounding development. Space has been set aside should on-site storage tanks be required.

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?

N/A

### Wastewater Disposal

Name of wastewater treatment provider for this site:

Douglasville-Douglas County Water & Sewer Authority (DDCWS)

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

0.034 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:

DDCWSA is working with several, surrounding developments on a project to expand the downstream sewer 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?

N/A

### Land Transportation

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

870 daily trips; 109 AM peak-hour trips; 91 PM peak-hour trips

Has a traffic study been performed to determine whether or not transportation or access improvements will be needed to serve this project? ☐ (not selected) ☒ Yes ☐ No

Are transportation improvements needed to serve this project? ☐ (not selected) ☐ Yes ☒ No

If yes, please describe below:

Please refer to the traffic study prepared by NV5 Engineers and Consultants, Inc.

### Solid Waste Disposal

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

1,608 TPY

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

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

N/A

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

If yes, please explain:

N/A

### Stormwater Management

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

64%

Describe any measures proposed (such as buffers, detention or retention ponds, pervious parking areas) to mitigate the project's impacts on stormwater management:

The site will utilize buffers and green infrastructure, including grass swales, vegetated filter strips, and infiltration measures where feasible to provide runoff reduction and TSS removal. Stormwater ponds will be utilized to provide water quality, channel protection, and detention in accordance with Douglas County and the Georgia Stormwater Management Manual requirements.

### Environmental Quality

Is the development located within, or likely to affect any of the following:

1. Water supply watersheds? ☐ (not selected) ☒ Yes ☐ No
2. Significant groundwater recharge areas? ☐ (not selected) ☐ Yes ☒ No
3. Wetlands? ☐ (not selected) ☐ Yes ☒ No
4. Protected mountains? ☐ (not selected) ☐ Yes ☒ No
5. Protected river corridors? ☐ (not selected) ☐ Yes ☒ No
6. Floodplains? ☐ (not selected) ☐ Yes ☒ No
7. Historic resources? ☐ (not selected) ☐ Yes ☒ No
8. Other environmentally sensitive resources? ☐ (not selected) ☐ Yes ☒ No

If you answered yes to any question above, describe how the identified resource(s) may be affected:

The project is located within a water supply watershed which requires greater-than-typical stream buffers. The project will meet the Douglas County water supply watershed buffer requirements.

**Submit Application**

Save without Submitting

Cancel

[Back to Top](#)

[GRTA DRI Page](#) | [ARC DRI Page](#) | [RC Links](#) | [DCA DRI Page](#)

[DRI Site Map](#) | [Contact](#)

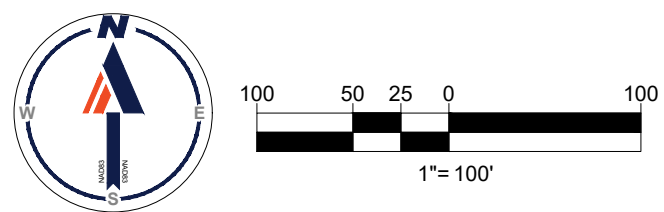








INSET A

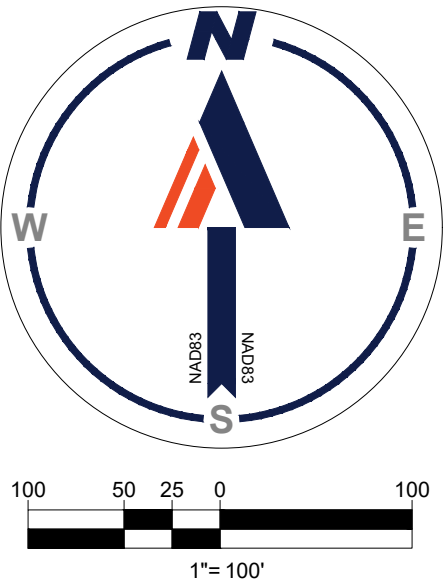


**SITE PLAN NOTES:**

1. DEVELOPMENT NAME: LITHIA SPRINGS DATA CENTER
2. DRI # 4326
3. DEVELOPER: STACK INFRASTRUCTURE 1700 BROADWAY SUITE 1750, DENVER, CO 80290
4. OWNER: SEE PARCELOWNER TABLE BELOW
5. PARCEL: SEE PARCELOWNER TABLE BELOW
6. ZONED: LI, R.A, C-H
7. SITE ENGINEER: BOHLER ENGINEERING 211 PERIMETER CENTER PKWY NE SUITE 425, ATLANTA, GA 30346  
BRETT BUCKLAND 678-695-6800 BBUCKLAND@BOHLERENG.COM
8. TRAFFIC CONSULTANT: NVS ENGINEERS AND CONSULTANTS, INC. 10765 WESTSIDE WAY SUITE 300 ALPHARETTA, GA 30009  
JOHN KARNOWSKI, P.E., PTOE, AICP 678-373-4827 JOHN.KARNOWSKI@NVS.COM
9. SOURCE OF DOMESTIC WATER SUPPLY - PUBLIC WATER MAIN ALONG FACTORY SHOALS ROAD/THORNTON RD
10. SOURCE OF SANITARY SEWAGE DISPOSAL - PUBLIC SEWER MAIN ALONG WESTERN PART OF PROPERTY.
11. PROPOSED SITE DATA

	NEW PHASE	TOTAL (INCL PREV. DRI)
TOTAL LOT AREA	± 37.4 AC	± 81.7 AC
TOTAL BUILDING SQUARE FOOTAGE	± 788,000 SF	+/- 1,676,886 SF
BUILDING STORIES IN EXCESS OF ONE	TWO (2)	TWO (2)
BUILDING HEIGHT	± 80'	+/- 120'
FLOOR AREA RATIO	0.49	0.47
TOTAL OPEN SPACE AREA	± 7.5 AC (20%)	+/- 29.4 AC (36%)
TOTAL PARKING REQUIRED	MAX 1 SPACE, MIN 0.75 SPACES PER EMPLOYEE FOR LARGEST SHIFT	MAX 1 SPACE, MIN 0.75 SPACES PER EMPLOYEE FOR LARGEST SHIFT
TOTAL PARKING PROVIDED	± 80 SPACES	+/- 230 SPACES
PROPOSED BUILDING USE	DATA CENTER	DATA CENTER

PARCEL ID	OWNER
07061820010	THORNTON ROAD INDUSTRIAL PROPERTIES, LLC
07071820001	CANTRELL, WESLEY, ETAL
07071820002	DUNN PAULETTE WILLIS, ESTATE, ET
07071820003	ADAMS, ANITA CHASTAIN
07071820004	CANTRELL, WESLEY
07071820005	ANDERSON, RONALD L.
07071820006	CANTRELL, WESLEY & BETTY
07061820011	CANTRELL, WESLEY & BETTY
07071820016	CANTRELL, WESLEY & BETTY
07071820022	TGC LITHIA, LLC
07071820015	ECHOLS, E R & JEFFREY SAMUEL
07071820018	TGC LITHIA 3, LLC
07071820017	CANTRELL, CONNIE & MCLEAN, ANGELA E.
07071820014	STRICKLAND, MARGARET D.
07071820013	CANTRELL, WESLEY
07071820012	CANTRELL, WESLEY & BETTY
07071820011	JENKINS, RICK
07071820010	LARA, ESPERANZA D. LOPEZ
07071820009	CANTRELL, WESLEY & BETTY
07071820008	CANTRELL, WESLEY & BETTY



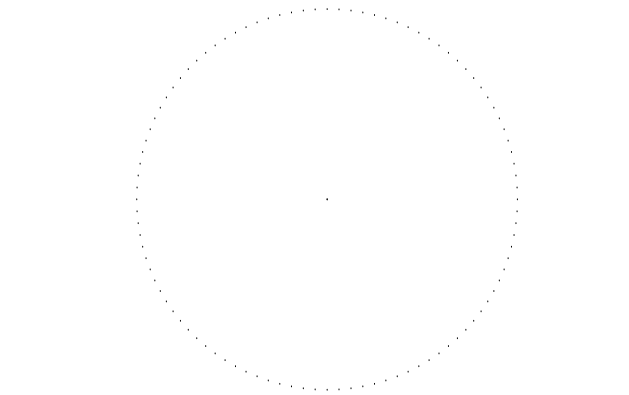
NOTES

CONFIDENTIAL

PROJECT ADDRESS  
720 FACTORY SHOALS RD,  
DOUGLAS COUNTY, GA

PROJECT DELIVERY PACKAGE  
SUP/REZONING SITE PLAN

SEAL/SIGNATURE



THE LICENSED PROFESSIONAL SEAL AFFIXED TO THIS SHEET APPLIES ONLY TO THE MATERIAL AND ITEMS SHOWN ON THIS SHEET. ALL DRAWINGS, INSTRUMENTS OR OTHER DOCUMENTS NOT EXHIBITING THIS SEAL SHALL NOT BE CONSIDERED PREPARED BY THIS PROFESSIONAL, AND THIS PROFESSIONAL EXPRESSLY DISCLAIMS ANY AND ALL RESPONSIBILITY FOR SUCH PLAN, DRAWINGS OR DOCUMENTS NOT EXHIBITING THIS SEAL.

ISSUE DATE: 08/26/2024 PROJECT NO: GAA230018.02  
DESIGNED: BOHLER ENGINEER: BRETT BUCKLAND  
MARK DATE DESCRIPTION

ANY UNAUTHORIZED USE OR REPRODUCTION OF THIS DOCUMENT IN WHOLE OR IN PART IS PROHIBITED. DELETE THIS DOCUMENT IF YOU HAVE RECEIVED IT IN ERROR.

CIVIL ENGINEER  
BOHLER ENGINEERING  
BRETT BUCKLAND, P.E.  
678-695-6800  
211 PERIMETER CENTER  
PKWY NE, SUITE 425  
ATLANTA, GA 30346

PROJECT: LITHIA SPRINGS DATA CENTER

TITLE:

DRAWING:

E1 SCALE: AS NOTED AGILE No: REV: A



**LITHIA SPRINGS DATA CENTER PHASE II DRI**  
**Douglas County**  
**Natural Resources Review Comments**  
**March 11, 2025**

ARC recognizes that energy demands will be very high for this project and that related water needs for cooling purposes may create a large peak demand from the Douglasville-Douglas County Water and Sewer Authority. The application proposes 0.062 MGD of water supply demand and 0.034 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 Douglasville-Douglas County Water and Sewer Authority 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 Douglasville-Douglas County Water and Sewer Authority 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.

**Drought Management Planning**

ARC recommends that Douglasville-Douglas County Water & Sewer Authority review its existing Drought Management Plan and update as needed to account for the prioritized water management requirements of data centers. Having a planned and organized drought response may help delay or avoid the need to implement more stringent water use restrictions and avoid harmful economic hardships.

**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 Department has identified County and State regulations that could apply to this property. Other regulations may also apply that we have not identified.

**Watershed Protection**

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

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

**Lithia Springs Data Center Phase II DRI**  
**ARC Natural Resources Comments**  
**Page Two**  
**March 11, 2025**

As stated above, there are no specific Part 5 Criteria for buffers or impervious surface limits in large (over 100 square miles) water supply watersheds such as Sweetwater Creek Water Supply Watersheds. However, the Part 5 Criteria do place restrictions on hazardous waste handling, storage and disposal within seven miles upstream of a public water supply intake. This project is within seven miles upstream of the City of East Point Intake on Sweetwater Creek.

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

**Stream Buffers**

The USGS coverage for the project area and the submitted site plan both show a blue-line branch of an unnamed tributary to Sweetwater Creek with headwaters starting in the southwestern corner of the project property and flowing to the west. The project is within the Douglas County Sweetwater Creek/ East Point Intake Basin subwatershed, with the basic requirement of a 150-foot impervious surface setback and a 100-foot undisturbed buffer on all streams but allows for 25% reductions to a 112.5-foot impervious setback and a 75-foot undisturbed buffer with an administrative variance. The submitted site plan shows the 112.5-foot impervious setback and a 75-foot undisturbed buffer, both noting the 25% reduction through administrative variances. The 25-foot State Sediment and Erosion Control buffer is also shown. No buffer or setback intrusions are shown for the portion of the project under review.

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.

**Floodplain**

The FEMA coverage for the project area shows no floodplain on the project property.

**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 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, methods, and runoff reduction practices sized and designed to retain the first 1.0 inch of rainfall on the site to the maximum extent practicable. Where possible, the project should use stormwater better site design practices included in the Georgia Stormwater Management Manual, Volume 2, Section 2.3. Better site design for stormwater management includes several site design techniques such as preserving natural features and resources, effectively laying out the site elements to reduce impact, reducing the amount of impervious surfaces, and using natural features on the site for stormwater management. The aim is to reduce the environmental impact "footprint" of the site while retaining and enhancing the owner/developer's purpose and vision for the site.

**Lithia Springs Data Center Phase II DRI**  
**ARC Natural Resources Comments**  
**Page Three**  
**March 11, 2025**

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

**Leverage Partnerships for Sustainability Opportunities**

Given the large energy footprint required by data centers, ARC recommends Douglas County foster a partnership with data center developers and operators to support sustainable practices both on and offsite. Recognition and agreement on the incorporation of these practices can help to reduce or offset potential environmental impacts such as water demands, energy needs, stormwater quality/flooding, noise, and air quality.

**Transmission Lines and Easement Needs**

The high energy demands of data centers often require significant investments in power related infrastructure. Douglas County should work with the data center developer to understand what, if any, upgrades to power transmission infrastructure and necessary easements would be needed to support the initial and future power needs of the development in addition to the substations proposed in the two phases of this project.

**Encourage Research and Innovation**

ARC encourages Douglas County to inquire what, if any, research and development opportunities will be considered by the data center developer to advance improvements in energy and water efficiency which can alleviate strain on local resources.

# Lithia Springs Data Center (Stack Data Center) Expansion onto Linda Ln

## Linda Ln – Access from Factory Shoals Rd & Linda Ln

*DRI Comments of March 12, 2025*

### General Comments

<u>Item #</u>	<u>Comments</u>
1	Provide a westbound right turn deceleration lane per County specification for the proposed Factory Shoals Rd access. Provide 35' minimum radii for the entrance.
2	The proposed entrance shall be 180 degrees from the entrance centerline located on the south side of Factory Shoals Rd.
3	Provide curb & gutter with underground drainage structures along the entire property frontage of Factory Shoals Rd.
4	The existing pavement markings shall be modified to create a eastbound left turn lane per County Standards into the proposed entrance of Factory Shoals Rd.
5	Provide 5' wide sidewalk and 4' sodded median along the entire property frontage and connect to the ADA ramp at the intersection of Factory Shoals Rd
6	The access to Linda Ln shall terminate into a Residential Cul-De-Sac and Right-Of-Way for the cul-de-sac. Driveway access to the site will be via a minimum 24' wide driveway apron.
7	The shall be no part of a retaining wall on the County Right-Of-Way (existing or proposed) to construct the cul-de-sac.
8	If Douglas County Board of Commissioners elect to Rezone and allow a Special Use Permit for a proposed Data Center on this site, they will also need to approve the abandonment of Linda Ln.
9	If abandonment of Linda Ln is approved by the BOC, the abandonment and land transaction will follow abolishment of all existing homes, removal of all utilities within the existing Right-Of-Way, all fees associated with possible utility relocations are paid in full with copies of satisfied payment provided to Douglas County and approval of LDP permit.
10	Provide a Traffic Study with distribution plan, projected AM/PM and Daily volumes. Provide a existing and build-out LOS at the intersection of Factory Shoals Rd and Thornton Rd. Conduct a Signal Warrant Study at the intersection of Bob Arnold Blvd and Thornton Rd based on existing and proposed trip generation.
11	Additional Douglas County UDC Code requirements will be enforced during plan submittal to Douglas County.

.....

**From:** [Hood, Alan C.](#)  
**To:** [Donald Shockey](#)  
**Subject:** RE: 2025 Lithia Springs Data Center DRI 4326 - Preliminary Report and Comments Request  
**Date:** Monday, March 10, 2025 8:25:38 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

---

Donald,

This proposed data center is approximately 4 miles from the Fulton County Executive Airport/Charlie Brown Field (FTY), and directly within the approach surface to Runway 8, and needs to be studied by the FAA.

An FAA Form 7460-1 should 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 construction and/or construction 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>

---

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

**Sent:** Wednesday, February 26, 2025 11:41 AM

**To:** 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