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: December 24, 2024

TO: Mayor Vincent Williams, Union City
ATTN TO: Anthony Alston, Community Development Director, Union City
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: ATL03 Red Oak DRI 4315
Submitting Local Government: City of Union City
Date Opened: December 9, 2024 **Date Closed:** December 24, 2024

Description: A DRI review of a proposal to construct a data center with four 250,000 SF buildings for a total of approximately 1,000,000 SF along with a sub-station and associated support facilities on a 67.8-acre currently forested site at 7170 Red Oak Road in Union City in Fulton 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 somewhat better aligned with Developing Suburbs policies through the reduction of stream buffer impacts, the retention of more natural wooded area, and the allocation of some of the estimated $18 million in local Union City annual revenue generated toward natural area conservation and acquisition elsewhere in the City.

The project will require clearing of much of the currently heavily forested site which will exacerbate local and regional heat island and climate change impacts. The impact of the tree removal will be partially mitigated through the replanting of some trees on and off site as required by Union City regulations. It is

strongly recommended that the number of trees removed be replaced one for one by trees planted elsewhere on the site or in Union City.

The water resources of the metro Atlanta region are critically important to the region's economic vitality and quality of life. ARC recommends a careful examination by Atlanta Watershed Management 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 Atlanta Watershed Management 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 site plan shows development of portions of Building 4, its equipment yard, and the surrounding road within a designated flood plain area. Development within the floodplain areas will need to meet all applicable requirements under the City's floodplain and future floodplain ordinances.

The plan shows development of the portions of Building 4 its equipment yard and its surrounding road over the buffers on part of the stream of the perennial stream and covering the buffers. Stream buffers provide minium levels of water quality protection and development should avoid compromising buffers as much as possible.

Fayette County submitted comments noting that there are numerous other DRI's in the general area of the project and that all of their transportation impacts should be evaluated collectively. The comments further noted that a stream or streams in the project site flow into the nearby Morning Creek which is designated as impaired due to bacterial contamination. Every effort should be made to avoid further degradation of this important water resource including avoiding stream buffer impacts.

The project will generate a total of 990 daily new vehicular trips.

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 recommends a careful examination by Atlanta Watershed Management 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 Atlanta Watershed Management 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.

Transportation and Mobility Comments

ARC's Transportation Access and Mobility Group comments are attached. The project will generate a total of 990 daily new vehicular trips. Several 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.

Comments received from GDOT Aviation are attached.

ARC Natural Resources Comments

ARC's Natural Resources Group comments are attached.

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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 City of Atlanta Department of Watershed Management (Atlanta Watershed Management). The application proposes 0.06 MGD of water supply demand and 0.075 MGD of estimated sewage flow generated by the project. It is unclear if these figures represent an annual average or daily maximum flow need. Given that daily maximum flow requirements for cooling purposes often occur during the hottest days of the year, the demand for water has a higher likelihood of occurring during times of water stress in the water supply watershed.

The water resources of the metro Atlanta region are critically important to the region's economic vitality and quality of life. The region lies in the headwaters of six major river basins, where natural surface water sources are small relative to other major metropolitan areas and in need of a high level of protection. The firm yield of water supply sources available to individual jurisdictions also varies, and some jurisdictions have larger available supplies than others. ARC recommends a careful examination by Atlanta Watershed Management 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 Atlanta Watershed Management require the installation of advanced "waterless" cooling technologies or "near waterless" technology to reduce the burden on drinking water supplies and increase resiliency of both the project and the potable water system.

The plan shows development of the portions of Building 4 its equipment yard and its surrounding road over the buffers on part of the stream of the perennial stream and covering the buffers. These intrusions may require variances and mitigation from the appropriate agencies.

The site plan shows a floodplain area identified as Flood Zone X, or the 500-year floodplain. The area shown is consistent with the current online FEMA floodplain maps, which do not show a 100-year floodplain zone on this portion of the stream. But while the FEMA definition of Flood Zone X is primarily for the 500-year floodplain (0.2% annual flood chance hazard), it also includes areas of 1% annual chance flood

{100-year floodplain} with average depth less than one foot or with drainage areas of less than one square mile. The site plan shows development of portions of Building 4 its equipment yard and its surrounding road within the flood plain area. Development within the floodplain areas will need to meet all applicable requirements under the City's floodplain and future floodplain ordinances.

Other Environmental Comments

While the project will require substantial clearing of the currently heavily-forested 68-acre site, the project will, in accordance with Union City tree preservation requirements, retain a number of trees on-site and plant others off-site which is supportive of regional environmental policies. It is strongly recommended that the number of trees removed be replaced one for one by trees planted elsewhere on the site or in Union City.Care should be taken in planting the replacement trees to maximize carbon sequestration and climate change/heat island mitigation.

The Atlanta Region's Plan strongly encourages the use of 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.

Portions of Building 4, its equipment yard and its surrounding road over the buffers on part of the stream of the perennial stream and covering the buffers. Stream buffers provide minium levels of water quality protection and development should avoid compromising buffers as much as possible.

Fayette County Comments

Attached comments submitted by Fayette County note that there are numerous other DRI's in the general area of the project and that all of their transportation impacts should be evaluated collectively. The comments further noted that a stream or streams in the project site flow into the nearby Morning Creek which is designated as impaired due to bacterial contamination. Every effort should be made to avoid further degradation of this important water resource including avoiding stream buffer impacts.

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 well 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 with these policies through the reduction of stream buffer impacts, the retention of more of the eixsting forested site, and the allocation of some of the annual $18 million in Union City revenue generated to support conservation land acquisition elsewhere in the City. Union City leadership and staff, along with the applicant team, should collaborate closely to ensure optimal sensitivity to the needs of nearby local governments, neighborhoods, and natural systems.

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

ATLANTA REGIONAL COMMISSION	GEORGIA DEPARTMENT OF NATURAL RESOURCE	GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS
GEORGIA DEPARTMENT OF TRANSPORTATION	GEORGIA REGIONAL TRANSPORTATION AUTHORITY	GEORGIA SOIL AND WATER CONSERVATION COMMISSION
GEORGIA ENVIRONMENTAL FINANCE AUTHORITY	GEORGIA CONSERVANCY	CITY OF FAIRBURN
CITY OF SOUTH FULTON	CITY OF UNION CITY	FAYETTE COUNTY

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

Georgia® Department of Community Affairs

Developments of Regional Impact

DRI #4315

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:	Union City
Individual completing form:	Anthony Alston
Telephone:	770 515 7955
E-mail:	aalston@unioncityga.org

*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:	ATL03/Red Oak
Location (Street Address, GPS Coordinates, or Legal Land Lot Description):	7170 Red Oak Rd, Union City, GA 30291
Brief Description of Project:	The proposed approx. 67.8-acre site includes proposed access along Buffington Road approximately 1,000 feet north of Jonesboro Road. As currently envisioned, the site will include four data center buildings of approximately 250,000 SF each for a total of approximately 1,000,000 SF data center facility.

Development Type:

○ (not selected)	○ Hotels	○ Wastewater Treatment Facilities
○ Office	○ Mixed Use	○ Petroleum Storage Facilities
○ Commercial	○ Airports	○ Water Supply Intakes/Reservoirs
○ Wholesale & Distribution	○ Attractions & Recreational Facilities	○ Intermodal Terminals
○ Hospitals and Health Care Facilities	○ Post-Secondary Schools	○ Truck Stops
○ Housing	○ Waste Handling Facilities	○ Any other development types
◉ Industrial	○ Quarries, Asphalt & Cement Plants	

If other development type, describe:

Project Size (# of units, floor area, etc.):	Approx. 1,000,000 SF Data Center
Developer:	TA Realty LLC
Mailing Address:	One Federal Street, 17th Floor
Address 2:	
	City:Boston State: MA Zip:02110
Telephone:	617-476-2700
Email:	info@tarealty.com
Is property owner different from developer/applicant?	○ (not selected) ◉ Yes ○ No
If yes, property owner:	Brightstar Commercial Properties LLC
Is the proposed project entirely located within your	○ (not selected) ◉ Yes ○ No

local government's jurisdiction?	
If no, in what additional jurisdictions is the project located?	
Is the current proposal a continuation or expansion of a previous DRI?	(not selected) Yes No
If yes, provide the following information:	Project Name: Project ID:
The initial action being requested of the local government for this project:	Rezoning Variance Sewer Water Permit Other
Is this project a phase or part of a larger overall project?	(not selected) Yes No
If yes, what percent of the overall project does this project/phase represent?	
Estimated Project Completion Dates:	This project/phase: 2030 Overall project: 2030

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Georgia® Department of Community Affairs

Developments of Regional Impact

DRI #4315

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:	Union City
Individual completing form:	Anthony Alston
Telephone:	770 515 7955
Email:	aalston@unioncityga.org

Project Information

Name of Proposed Project:	ATL03/Red Oak
DRI ID Number:	4315
Developer/Applicant:	TA Realty LLC
Telephone:	617-476-2700
Email(s):	info@tarealty.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:	$1,500,000,000
Estimated annual local tax revenues (i.e., property tax, sales tax) likely to be generated by the proposed development:	$18,000,000
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):

Water Supply

Name of water supply provider for this site:	City of Atlanta

What is the estimated water supply demand to be generated by the project, measured in Millions of Gallons Per Day (MGD)?	0.6 MGD
Is sufficient water supply capacity available to serve the proposed project?	(not selected) Yes No
If no, describe any plans to expand the existing water supply capacity:	
Is a water line extension required to serve this project?	(not selected) Yes No
If yes, how much additional line (in miles) will be required?	

Wastewater Disposal

Name of wastewater treatment provider for this site:	Fulton County Sewer
What is the estimated sewage flow to be generated by the project, measured in Millions of Gallons Per Day (MGD)?	0.075 MGD
Is sufficient wastewater treatment capacity available to serve this proposed project?	(not selected) Yes No
If no, describe any plans to expand existing wastewater treatment capacity:	
Is a sewer line extension required to serve this project?	(not selected) Yes No
If yes, how much additional line (in miles) will be required?	

Land Transportation

How much traffic volume is expected to be generated by the proposed development, in peak hour vehicle trips per day? (If only an alternative measure of volume is available, please provide.)	990 Daily | 110 AM | 90 PM 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 see the Limited Trip Generation Memorandum prepared by Kimley-Horn

Solid Waste Disposal

How much solid waste is the project expected to generate annually (in tons)?	264 tons
Is sufficient landfill capacity available to serve this proposed project?	(not selected) Yes No
If no, describe any plans to expand existing landfill capacity:	
Will any hazardous waste be generated by the development?	(not selected) Yes No
If yes, please explain:	

Stormwater Management

What percentage of the site is projected to be impervious surface once the proposed development has been constructed?	Approx. 60%

Describe any measures proposed (such as buffers, detention or retention ponds, pervious parking areas) to mitigate the project's impacts on stormwater management:The project will have multiple stormwater management areas that will incorporate runoff reduction volume and flow attenuation components. The post developed flows will comply with the local and state ordinances.

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 site has jurisdictional streams and wetlands that will be impacted as part of the development. The project will complete any required permitting for these impacts.

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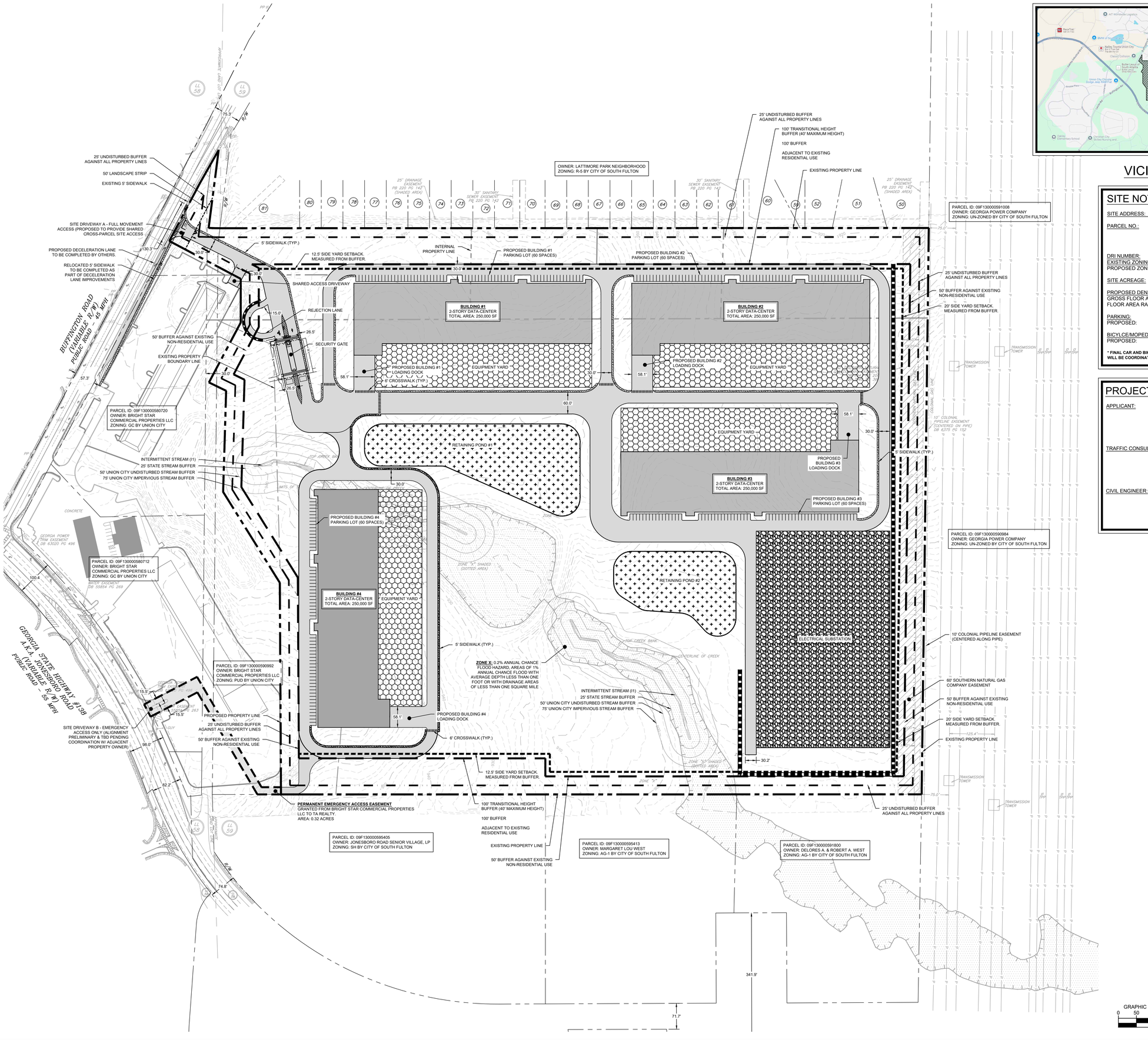
GRTA DRI Page | ARC DRI Page | RC Links | DCA DRI Page DRI Site Map | Contact



SITE NOTES:

SITE ADDRESS:	7170 RED OAK RD, UNION CITY, GEORGIA 30291
PARCEL NO.:	09F130000580720; 09F130000591305; 09F130000591388; 09F130000591370; 09F130000591396; 09F130000591404; 09F130000590992
DRI NUMBER:	4315
EXISTING ZONING:	GC, PUD
PROPOSED ZONING:	O-I
SITE ACREAGE:	67.79 ACRES
PROPOSED DENSITY RATIOS	
GROSS FLOOR AREA:	1,000,000 SF
FLOOR AREA RATIO (FAR):	0.34
PARKING:	
PROPOSED:	240 SPACES*
BICYCLE/MOPED PARKING:	
PROPOSED:	12 SPACES*

*** FINAL CAR AND BIKE PARKING PROVIDED TO BE BASED OFF FINAL DENSITY BUILT AND WILL BE COORDINATED WITH UNION CITY TO MEET REQUIREMENTS.**

PROJECT CONTACTS:

APPLICANT:	TA REALTY ONE FEDERAL STREET, 17TH FLOOR BOSTON, MA 02110 CONTACT: DAVID BUXBAUM, CHRIS TROTMAN PHONE: 617.476.2700
TRAFFIC CONSULTANT:	KIMLEY-HORN & ASSOCIATES, INC. 1200 PEACHTREE STREET NE SUITE 800 ATLANTA, GA 30309 CONTACT: ANA EISENMAN, P.E. PHONE: 404.201.6155
CIVIL ENGINEER:	KIMLEY-HORN & ASSOCIATES, INC. 1200 PEACHTREE STREET NE SUITE 800 ATLANTA, GA 30309 CONTACT: ZAC RANDOLPH, P.E. PHONE: 404.419.8700

GRAPHIC SCALE IN FEET
0 50 100 200

Know what's below. Call before you dig.

Kimley»Horn
PHONE 404.419.8700
WWW.KIMLEY-HORN.COM
1200 PEACHTREE ST NE
SUITE 800
ATLANTA, GEORGIA 30309

PROJECT
TA REALTY LLC
ONE FEDERAL ST. 17TH FLOOR
BOSTON, MA 02110
PHONE 757.630.2279

No.	REVISION DESCRIPTIONS	DATE	BY
	DRI SITE PLAN FINAL	11/08/2024	SFD
	DRI SITE PLAN REVISIONS	10/29/2024	KAR
	DRI SITE PLAN	10/25/2024	SFD
	REZONING SITE PLAN	09/24/2024	ZLR

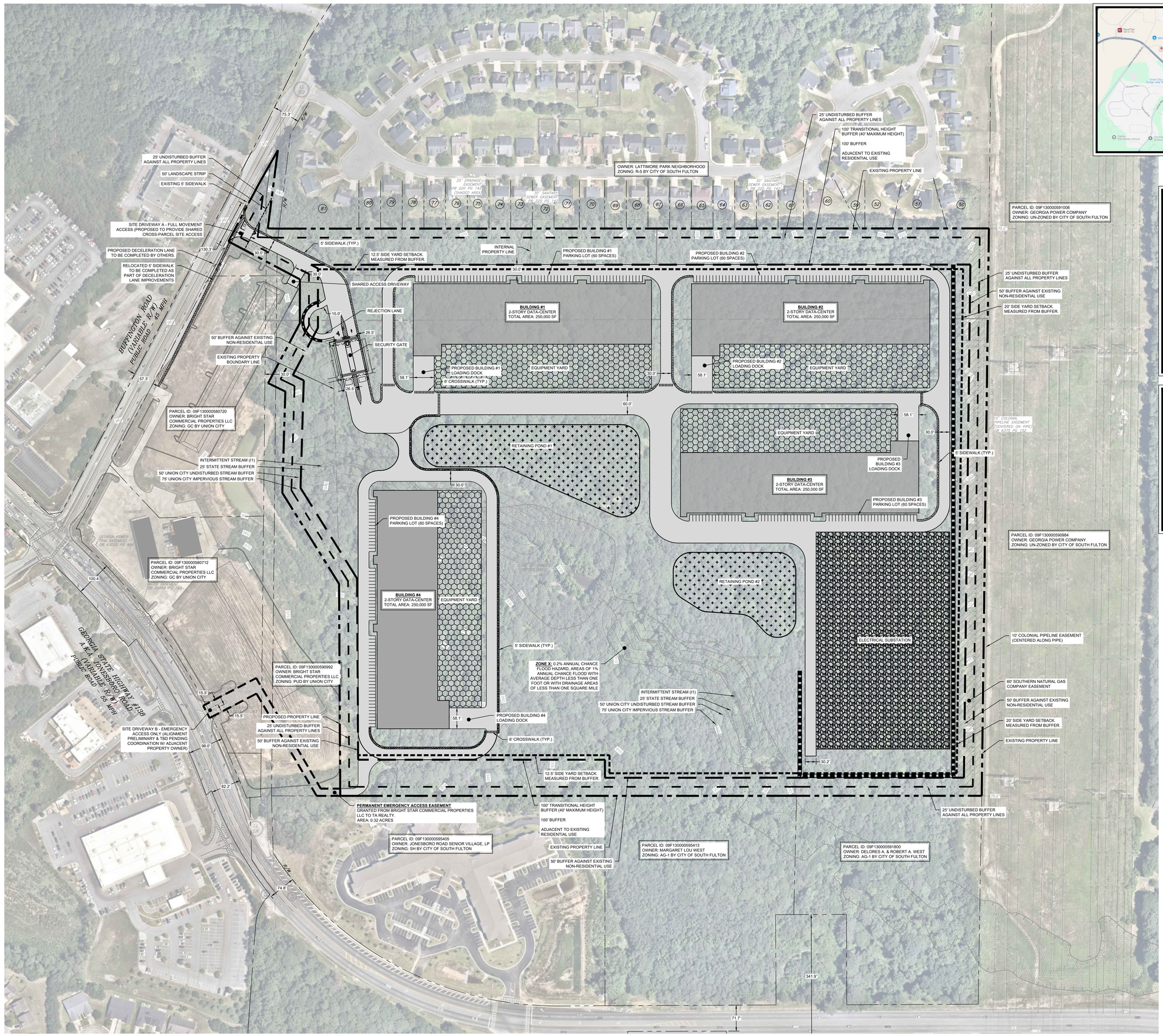
ATL03/RED OAK
PIN 09F130000580720, 09F130000591388, 09F130000591370, 09F130000591396, 09F130000591404, & 09F130000590992
7170 RED OAK RD.
ATLANTA, GEORGIA 30291

GEORGIA REGISTERED No. PE043951 PROFESSIONAL ENGINEER
11/08/2024

GSWCC CERT. (LEVEL II)	0000076496
DRAWN BY	SFD
DESIGNED BY	SFD
REVIEWED BY	ZLR
DATE	11/08/2024
PROJECT NO.	017676001
TITLE	DRI SITE PLAN
SHEET NUMBER	C0.20

PRELIMINARY: NOT FOR CONSTRUCTION

Drawing name: K:\AMT_CIVIL\017676001_Red Oak Data Center\CAD\Plansheets\C0.30 - DRI SITE PLAN.dwg C0.20 REZONING SITE PLAN Nov 08, 2024 12:20pm by: sean.davis



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PARCEL NO.:	09F130000580720; 09F130000591305; 09F130000591388; 09F130000591370; 09F130000591396; 09F130000591404; 09F130000590992
DRI NUMBER:	XXX
EXISTING ZONING:	GC, PUD
PROPOSED ZONING:	O-I
SITE ACREAGE:	67.79 ACRES
PROPOSED DENSITY RATIOS	
GROSS FLOOR AREA:	1,000,000 SF
FLOOR AREA RATIO (FAR):	0.34
PARKING:	
PROPOSED:	240 SPACES*
BICYCLE/MOPED PARKING:	
PROPOSED:	10 SPACES*

*** FINAL CAR AND BIKE PARKING PROVIDED TO BE BASED OFF FINAL DENSITY BUILT. MINIMUM REQUIRED PARKING IS CALCULATED FOR 1 SPACE PER 600 SF OF OFFICE SF WITHIN DATA CENTER.**

PROJECT CONTACTS:

APPLICANT:	TA REALTY ONE FEDERAL STREET, 17TH FLOOR BOSTON, MA 02110 CONTACT: CHRIS TROTMAN PHONE: 757.630.2279
TRAFFIC CONSULTANT:	KIMLEY-HORN & ASSOCIATES, INC. 1200 PEACHTREE STREET NE SUITE 800 ATLANTA, GA 30309 CONTACT: ANA EISENMAN, P.E. PHONE: 404.201.6155
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SUITE 800
ATLANTA, GEORGIA 30309

TA REALTY LLC
ONE FEDERAL ST 17TH FLOOR
BOSTON MA 02110
PHONE 757.630.2279

No.	REVISION DESCRIPTIONS	DATE	BY
	REZONING SITE PLAN	09/24/2024	ZLR
	DRI SITE PLAN	10/25/2024	SFD
	DRI SITE PLAN REVISIONS	10/29/2024	KAR
	DRI SITE PLAN FINAL	11/08/2024	SFD

PROJECT
ATL03/RED OAK
PIN 09F130000580720, 09F130000591388, 09F130000591370, 09F130000591396, 09F130000590984, & 09F130000590992
7170 RED OAK RD,
ATLANTA, GEORGIA 30291

GEORGIA REGISTERED No. PE043951 PROFESSIONAL ENGINEER ZAC RANDOLPH
11/08/2024

GSWCC CERT. (LEVEL II)	0000076496
DRAWN BY	SFD
DESIGNED BY	SFD
REVIEWED BY	ZLR
DATE	11/08/2024
PROJECT NO.	017676001

TITLE
DRI SITE PLAN - AERIAL

SHEET NUMBER
C0.20

PRELIMINARY: NOT FOR CONSTRUCTION

811 Know what's below. Call before you dig.

Drawing name: K:\AMT_CIVIL\017676001_Red Oak Data Center\CAD\Plansheets\C0.30 - DRI SITE PLAN.dwg C0.21 REZONING SITE PLAN - AERIAL Nov 08, 2024 12:31pm by: sean.davis

ATL03 RED OAK DRI
City of Union City
Natural Resources Review Comments
December 23, 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 City of Atlanta Department of Watershed Management (Atlanta Watershed Management). The application proposes 0.06 MGD of water supply demand and 0.075 MGD of estimated sewage flow generated by the project. It is unclear if these figures represent an annual average or daily maximum flow need. Given that daily maximum flow requirements for cooling purposes often occur during the hottest days of the year, the demand for water has a higher likelihood of occurring during times of water stress in the water supply watershed.

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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 property is located in the Morning Creek basin, which is part of the Flint River watershed. The Flint is a large water supply watershed (over 100 square miles), as defined under the Part 5 Criteria of the 1989 Georgia Planning Act. 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 Flint.

Stream Buffers
The USGS coverage for the project area and the submitted site plan both show a blue-line perennial tributary of Morning Creek starting on the property. The submitted site shows and identifies the 25-foot State Sediment and Erosion Control Buffer as well as the City 50-foot undisturbed buffer and 75-foot impervious setback on two segments of the stream. The area between the segments appears to be the existing pond on the property. The plan also shows development of the portions of Building 4 its equipment yard and its surrounding road over the buffers on part of the stream of the perennial stream and covering the buffers. These intrusions may require variances and mitigation from the appropriate agencies. No other intrusions are shown on the site plan.

Any unmapped streams on the property may also be subject to the City 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 site plan shows a floodplain area identified as Flood Zone X, or the 500-year floodplain. The area shown is consistent with the current online FEMA floodplain maps, which do not show a 100-year floodplain zone on this portion of the stream. But while the FEMA definition of Flood Zone X is primarily for the 500-year floodplain (0.2% annual flood chance hazard), it also includes areas of 1% annual chance flood {100-year floodplain} with average depth less than one foot or with drainage areas of less than one square mile. The site plan shows development of portions of Building 4 its equipment yard and its surrounding road within the flood plain area. Development within the floodplain areas will need to meet all applicable requirements under the City's floodplain and future floodplain ordinances.

Water Supply and Wastewater

Given the large water demands associated with data centers, we recommend working with the Atlanta Watershed Management 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 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) 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.

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

FAYETTE County
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Planning and Zoning

140 Stonewall Avenue West, Ste 202
Fayetteville, Georgia 30214
Phone: 770-305-5421
www.fayettecountyga.gov

December 18, 2024

Donald P. Shockey
Plan Review Manager
Atlanta Regional Commission
International Tower
229 Peachtree Street NE | Suite 100
Atlanta, Georgia 30303

Subject: DRI #4315 – ATL Red Oak – Fayette County Comments

Dear Mr. Shockey:

Fayette County would like to submit the following comments to be considered in the development of this project:

Fayette County Public Works

Fayette County staff would like to thank you for the opportunity to review this project as it is very likely to increase the impact to our existing transportation network. Many of the projects we have reviewed over the last few years, including DRI 4315, show that expected volumes are not enough to warrant evaluation or mitigation to the Fayette County transportation network. However, we find it difficult to track the cumulative impacts as many of these projects complete the ARC process. The combined trips generated by the DRI's listed below **will** affect our transportation networks within unincorporated Fayette County:

Tyrone	DRI – 3628 Hwy 74 Business Tech Park, final report 7/21/2022
Fayetteville	DRI – Trilith Expansion, Staff recommendations 11/14/2022
Fayetteville	DRI – 3813 QTS, final report 1/3/2023
Coweta	DRI - 4079 - T5 ATL IV Data Center - Notice of Decision 02/05/2024
Tyrone	DRI - 4094 - Project Rita – Notice of Decision 03/28/2024
Senoia	DRI - 4143 - 141 South Project –*3 Rivers, current proposal
Coweta	DRI - 4164 - Benister –*3 Rivers, current proposal
Coweta	DRI - 4194 - Trinity Christian School, current proposal
Fairburn	DRI – 4213 Fairburn Technology center, Notice of decision 8/19/2024

South Fulton	DRI - 4237 - Lofts at South Fulton, current proposal
Coweta	DRI - 4301 Project Peach, current proposal
Fayetteville	DRI – 4306 Fayetteville City Center, current proposal
South Fulton	DRI – 4313 – Mapco Industrial site – current proposal
Union City	DRI – 4315 ATL03 Red Oak, current proposal

Many of the transportation studies presented in the DRI reviews are utilizing GDOT future road projects as part of their analysis with varying infrastructure improvements to surrounding transportation networks. Fayette County would ask that the ARC staff provide transportation data to applicants to assist in reviewing road networks for the surrounding municipalities including proposed DRI transportation data or Final Notice DRI findings. This will assist all stakeholders with responsibilities to their residents.

Environmental Management

After review of the site plan, it appears that the state waters on the site is a tributary to Morning Creek. Morning Creek flows through Fayette County and into the Flint River. Morning Creek is already designated as an impaired stream due to bacterial contamination. The Flint River is the only large water-supply watershed in the county and has intakes for Fayette County, Clayton County and the City of Griffin. Fayette County requests that Union City follow the Metropolitan North Georgia Model Stream Buffer Protection Ordinance if not fully adopted, and that future stormwater management plans will utilize the most current Georgia Stormwater Management Manual for water quality.

Sincerely,

Deborah L Bell

Deborah L. Bell, RLA
Director

From: Hood, Alan C.
To: Donald Shockey
Subject: RE: ATL03 Red Oak DRI 4315 - Preliminary Report and Comments Request
Date: Monday, December 23, 2024 9:47:38 AM
Attachments: image001.png

Donald,

This proposed data center is more than 5 miles from the Hartsfield/Jackson Atlanta International Airport (ATL). It is located outside of the FAA approach or departure surfaces, and airport compatible land use areas, and does not appear to impact any airport.

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

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

Alan Hood
Airport Safety Data Program Manager

GDOT Georgia Department of Transportation

Aviation Programs
600 West Peachtree Street NW
6th 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: Monday, December 9, 2024 5:25 PM
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 <AGoodwin@atlantaregional.org>; Andrew Smith <ASmith@atlantaregional.org>; Ansley Goddard <AGoddard@atlantaregional.org>; Arin Yost <AYost@atlantaregional.org>; Danny Johnson <DJohnson@atlantaregional.org>; David Haynes <DHaynes@atlantaregional.org>; Eleanor Swensson

ATLANTA REGIONAL COMMISSION
regional impact + local relevance

40 Courtland Street, NE
Atlanta, Georgia 30303
atlantaregional.com

Development of Regional Impact

Assessment of Consistency with the Regional Transportation Plan

DRI INFORMATION

DRI Number	#4315
DRI Title	ATL03 Red Oak
County	Fulton County
City (if applicable)	Union City
Address / Location	7170 Red Oak Road

Proposed Development Type:

A DRI review of a proposal to construct a data center with four 250,000 SF buildings for a total of approximately 1,000,000 SF along with a sub-station and associated support facilities on a 67.8-acre currently forested site at 7170 Red Oak Road in Union City in Fulton County.

Build Out: 2030

Review Process

☐ EXPEDITED

☒ NON-EXPEDITED

REVIEW INFORMATION

Prepared by	ARC Transportation Planning Department
Staff Lead	Reginald James
Copied	N/A
Date	December 10, 2024

TRAFFIC STUDY

Prepared by	Kimley-Horn
Date	November 4, 2024

REGIONAL TRANSPORTATION PLAN PROJECTS

01. Did the traffic analysis incorporate all projects contained in the current version of the fiscally constrained RTP which are within the study area or along major transportation corridors connecting the study area with adjacent jurisdictions?

☒ YES *(provide the regional plan referenced and the page number of the traffic study where relevant projects are identified)*

On page 8 of the traffic study.

☐ NO *(provide comments below)*

Click here to provide comments.

REGIONAL NETWORKS

02. Will the development site be directly served by any roadways identified as Regional Thoroughfares?

A Regional Thoroughfare is a major transportation corridor that serves multiple ways of traveling, including walking, bicycling, driving, and riding transit. It connects people and goods to important places in metropolitan Atlanta. A Regional Thoroughfare's operations should be managed through application of special traffic control strategies and suitable land development guidelines in order to maintain travel efficiency, reliability, and safety for all users. In light of the special function that Regional Thoroughfares serve in supporting cross-regional and interjurisdictional mobility and access, the network receives priority consideration for infrastructure investment in the Metro Atlanta region. Any access points between the development and a Regional Thoroughfare, combined with the development's on-site circulation patterns, must be designed with the goal of preserving the highest possible level of capacity and safety for all users of the roadway.

☐ NO

☒ YES *(identify the roadways and existing/proposed access points)*

Driveway B provides emergency access via a roadway identified as a Regional Thoroughfare.

03. Will the development site be directly served by any roadways identified as Regional Truck Routes?

A Regional Truck Route is a freeway, state route or other roadway which serves as a critical link for the movement of goods to, from and within the Region by connecting airports, intermodal/multimodal facilities, distribution and warehousing centers and manufacturing clusters with the rest of the state and nation. These facilities often serve a key mobility and access function for other users as well, including drivers, bicyclists, pedestrians and transit users. A Regional Truck Route's operations should be managed through application of special traffic control strategies and suitable land development guidelines in order to maintain travel efficiency, reliability, and safety for all users. In light of the special function that Regional Truck Routes serve in supporting cross-regional and interjurisdictional mobility and access, the network receives priority consideration for infrastructure investment in the Metro Atlanta region. Any access points between the development and a Regional Truck Route, combined with the development's on-site circulation patterns, must be designed with the goal of preserving the highest possible level of capacity and safety for all users of the roadway.

☐ NO

☒ YES *(identify the roadways and existing/proposed access points)*

Driveway B provides access to the site via a roadway identified as a Regional Truck Route.

04. If the development site is within one mile of an existing rail service, provide information on accessibility conditions.

Access between major developments and transit services provide options for people who cannot or prefer not to drive, expand economic opportunities by better connecting people and jobs, and can help reduce congestion. If a transit service is available nearby, but walking or bicycling between the development site and the nearest station is a challenge, the applicable local government(s) is encouraged to make the route a funding priority for future walking and bicycling infrastructure improvements.

☒ NOT APPLICABLE *(nearest station more than one mile away)*

☐ RAIL SERVICE WITHIN ONE MILE *(provide additional information below)*

Operator / Rail Line

Nearest Station — Click here to enter name of operator and rail line

Distance*
- ☐ Within or adjacent to the development site (0.10 mile or less)
- ☐ 0.10 to 0.50 mile
- ☐ 0.50 to 1.00 mile

Walking Access*
- ☐ Sidewalks and crosswalks provide sufficient connectivity
- ☐ Sidewalk and crosswalk network is incomplete

	☐ Not applicable *(accessing the site by walking is not consistent with the type of development proposed)*
	Click here to provide comments.
Bicycling Access*	☐ Dedicated paths, lanes or cycle tracks provide sufficient connectivity
	☐ Low volume and/or low speed streets provide connectivity
	☐ Route follows high volume and/or high speed streets
	☐ Not applicable *(accessing the site by bicycling is not consistent with the type of development proposed)*
Transit Connectivity	☐ Fixed route transit agency bus service available to rail station
	☐ Private shuttle or circulator available to rail station
	☐ No services available to rail station
	☐ Not applicable *(accessing the site by transit is not consistent with the type of development proposed)*
	Click here to provide comments.

** Following the most direct feasible walking or bicycling route to the nearest point on the development site*

05. If there is currently no rail transit service within one mile of the development site, is nearby rail service planned in the fiscally constrained RTP?

Access between major developments and transit services provide options for people who cannot or prefer not to drive, expand economic opportunities by better connecting people and jobs, and can help reduce traffic congestion. If a transit agency operates within the jurisdiction and expansion plans are being considered in the general vicinity of the development site, the agency should give consideration to how the site can be best served during the evaluation of alignments and station locations. Proactive negotiations with the development team and local government(s) are encouraged to determine whether right-of-way within the site should be identified and protected for potential future service. If direct service to the site is not feasible or cost effective, the transit agency and local government(s) are encouraged to ensure good walking and bicycling access accessibility is provided between the development and the future rail line. These improvements should be considered fundamental components of the overall transit expansion project, with improvements completed concurrent with or prior to the transit service being brought online.

- ☐ NOT APPLICABLE *(rail service already exists)*
- ☐ NOT APPLICABLE *(accessing the site by transit is not consistent with the type of development proposed)*
- ☒ NO *(no plans exist to provide rail service in the general vicinity)*
- ☐ YES *(provide additional information on the timeframe of the expansion project below)*
  - ☐ CST planned within TIP period
  - ☐ CST planned within first portion of long range period
  - ☐ CST planned near end of plan horizon

Click here to provide comments.

06. If the development site is within one mile of fixed route bus services (including any privately operated shuttles or circulators open to the general public), provide information on walking and bicycling accessibility conditions.

Access between major developments and transit services provide options for people who cannot or prefer not to drive, expand economic opportunities by better connecting people and jobs, and can help reduce congestion. If a transit service is available nearby, but walking or bicycling between the development site and the nearest station is a challenge, the applicable local government(s) is encouraged to make the connection a funding priority for future walking and bicycling infrastructure improvements.

☐ NOT APPLICABLE *(nearest bus, shuttle or circulator stop more than one mile away)*

☒ SERVICE WITHIN ONE MILE *(provide additional information below)*

Operator(s) MARTA

Bus Route(s) 89, 188

Distance*
- ☐ Within or adjacent to the development site (0.10 mile or less)
- ☒ 0.10 to 0.50 mile
- ☐ 0.50 to 1.00 mile

Walking Access*
- ☒ Sidewalks and crosswalks provide sufficient connectivity
- ☐ Sidewalk and crosswalk network is incomplete
- ☐ Not applicable *(accessing the site by walking is not consistent with the type of development proposed)*

Click here to provide comments.

Bicycling Access*
- ☐ Dedicated paths, lanes or cycle tracks provide sufficient connectivity
- ☐ Low volume and/or low speed streets provide sufficient connectivity
- ☒ Route uses high volume and/or high speed streets
- ☐ Not applicable *(accessing the site by bicycling is not consistent with the type of development proposed)*

* *Following the most direct feasible walking or bicycling route to the nearest point on the development site*

07. Does a transit agency which provides rail and/or fixed route bus service operate anywhere within the jurisdiction in which the development site is located?

Access between major developments and transit services provide options for people who cannot or prefer not to drive, expand economic opportunities by better connecting people and jobs, and can help reduce traffic congestion. If a transit agency operates within the jurisdiction and a comprehensive operations plan update is undertaken, the agency should give consideration to serving the site during the evaluation of future routes, bus stops and transfer facilities. If the nature of the development is amenable to access by transit, walking or bicycling, but direct service to the site is not feasible or cost effective, the transit agency and local government(s) should ensure good walking and bicycling access accessibility is provided between the development and any routes within a one mile radius. The applicable local government(s) is encouraged to make these connections a funding priority for future walking and bicycling infrastructure improvements.

☐ NO

☒ YES

MARTA

08. If the development site is within one mile of an existing multi-use path or trail, provide information on accessibility conditions.

Access between major developments and walking/bicycling facilities provide options for people who cannot or prefer not to drive, expand economic opportunities by better connecting people and jobs, and can help reduce traffic congestion. If connectivity with a regionally significant path or trail is available nearby, but walking or bicycling between the development site and those facilities is a challenge, the applicable local government(s) is encouraged to make the route a funding priority for future walking and bicycling infrastructure improvements.

☒ NOT APPLICABLE *(nearest path or trail more than one mile away)*

☐ YES *(provide additional information below)*

Name of facility: Click here to provide name of facility.

Distance
- ☐ Within or adjacent to development site (0.10 mile or less)
- ☐ 0.15 to 0.50 mile
- ☐ 0.50 to 1.00 mile

Walking Access*
- ☐ Sidewalks and crosswalks provide connectivity
- ☐ Sidewalk and crosswalk network is incomplete
- ☐ Not applicable *(accessing the site by walking is not consistent with the type of development proposed)*

Bicycling Access*
- ☐ Dedicated lanes or cycle tracks provide connectivity
- ☐ Low volume and/or low speed streets provide connectivity
- ☐ Route uses high volume and/or high speed streets

☐ Not applicable *(accessing the site by bicycling is not consistent with the type of development proposed*

* *Following the most direct feasible walking or bicycling route to the nearest point on the development site*

OTHER TRANSPORTATION DESIGN CONSIDERATIONS

09. Does the site plan provide for the construction of publicly accessible local road or drive aisle connections with adjacent parcels?

The ability for drivers and bus routes to move between developments without using the adjacent arterial or collector roadway networks can save time and reduce congestion. Such opportunities should be considered and proactively incorporated into development site plans whenever possible.

☒ YES *(connections to adjacent parcels are planned as part of the development)*

☐ YES *(stub outs will make future connections possible when adjacent parcels redevelop)*

☐ NO *(the site plan precludes future connections with adjacent parcels when they redevelop)*

☐ OTHER *(Please explain)*

10. Does the site plan enable pedestrians and bicyclists to move between destinations within the development site safely and conveniently?

The ability for walkers and bicyclists to move within the site safely and conveniently reduces reliance on vehicular trips, which has congestion reduction and health benefits. Development site plans should incorporate well designed and direct sidewalk connections between all key destinations. To the extent practical, bicycle lanes or multiuse paths are encouraged for large acreage sites and where high volumes of bicyclists and pedestrians are possible.

☒ YES *(sidewalks provided on all key walking routes and both sides of roads whenever practical and bicyclists should have no major issues navigating the street network)*

☐ PARTIAL *(some walking and bicycling facilities are provided, but connections are not comprehensive and/or direct)*

☐ NO *(walking and bicycling facilities within the site are limited or nonexistent)*

☐ NOT APPLICABLE *(the nature of the development does not lend itself to internal walking and bicycling trips)*

☐ OTHER *(Please explain)*

11. Does the site plan provide the ability to construct publicly accessible bicycling and walking connections with adjacent parcels which may be redeveloped in the future?

The ability for walkers and bicyclists to move between developments safely and conveniently reduces reliance on vehicular trips, which has congestion reduction and health benefits. Such opportunities should be considered and proactively incorporated into development site plans whenever possible.

- ☒ YES *(connections to adjacent parcels are planned as part of the development)*
- ☐ YES *(stub outs will make future connections possible when adjacent parcels redevelop)*
- ☐ NO *(the development site plan does not enable walking or bicycling to/from adjacent parcels)*
- ☐ NO *(the site plan precludes future connections with adjacent parcels when they redevelop)*
- ☐ NOT APPLICABLE *(adjacent parcels are not likely to develop or redevelop in the near future)*
- ☐ NOT APPLICABLE *(the nature of the development or adjacent parcels does not lend itself to interparcel walking and bicycling trips)*

12. Does the site plan effectively manage truck movements and separate them, to the extent possible, from the flow of pedestrians, bicyclists and motorists both within the site and on the surrounding road network?

The ability for delivery and service vehicles to efficiently enter and exit major developments is often key to their economic success. So is the ability of visitors and customers being able to move around safely and pleasantly within the site. To the extent practical, truck movements should be segregated by minimizing the number of conflict points with publicly accessible internal roadways, sidewalks, paths and other facilities.

- ☐ YES *(truck routes to serve destinations within the site are clearly delineated, provide ample space for queuing and turning around, and are separated from other users to the extent practical)*
- ☐ PARTIAL *(while one or more truck routes are also used by motorists and/or interface with primary walking and bicycling routes, the site plan mitigates the potential for conflict adequately)*
- ☐ NO *(one or more truck routes serving the site conflict directly with routes likely to be used heavily by pedestrians, bicyclists and/or motorists)*
- ☒ NOT APPLICABLE *(the nature of the development will not generate a wide variety of users and/or very low truck volumes, so the potential for conflict is negligible)*

RECOMMENDATIONS

13. Do the transportation network recommendations outlined in the traffic study appear to be feasible from a constructability standpoint?

- ☐ UNKNOWN *(additional study is necessary)*
- ☒ YES *(based on information made available through the review process; does not represent a thorough engineering / financial analysis)*

☐ NO *(see comments below)*

Click here to enter text.

14. Is ARC aware of any issues with the development proposal which may result in it being opposed by one or more local governments, agencies or stakeholder groups?

☒ NO *(based on information shared with ARC staff prior to or during the review process; does not reflect the outcome of an extensive stakeholder engagement process)*

☐ YES *(see comments below)*

Click here to enter text.

15. ARC offers the following additional comments for consideration by the development team and/or the applicable local government(s):

None at this time.