

# Regional Review Finding **Development of Regional Impact**

DATE: April 18, 2025

TO: Chairwoman Romona Jackson Jones, Douglas County Commission

ATTN TO: Austin Cronan, Zoning Administrator, Douglas County FROM: Mike Alexander, COO, Atlanta Regional Commission

RE: Development of Regional Impact (DRI) Review

ARC has completed a regional review of the below DRI. ARC reviewed the project's relationship to regional plans, goals and policies as well as impacts the project may have on the activities, plans, goals and policies of other local jurisdictions and 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: Stream Data Center DRI 4334 **Submitting Local Government:** Douglas County

Date Opened: March 24, 2025 Date Closed: April 18, 2025

The review period was extended due to the need to correct the initial SF reported from 1,343, 700 SF to 2,687,400 SF.

**Description:** A DRI review of a proposal to construct a data center with 2,687,400 SF of space in 9 buildings along with 2 substations and supporting facilities on a 275-acre currently wooded site with multiple streams on Jason Industrial Parkway in Douglas County. The review period was extended due to the need to correct the initial SF reported from 1,343, 700 SF to 2,687,400 SF.

# **Key Comments:**

The project is highly incompatible with applicable Atlanta Region's Plan policy recommendations for Rural Areas which stress the need to protect these areas and their character and note: "There is a strong desire from residents and elected officials in these areas to keep them rural...The region is striving to protect these areas by limiting infrastructure investments to targeted areas and allowing no development or only low impact development."

Construction of large portions of the project - including all of buildings 3,4,6 and 7 - will require destruction of large areas of protected streams which will require stream buffer variances as well as USACE wetlands mitigation.

The project will require clearing of much of the forested portion of the site which will exacerbate local and regional heat island and stormwater impacts.

The project could be somewhat better aligned with Rural Areas policies through the retention of natural wooded area of the site and the allocation of some of the estimated \$60 million in local Douglas County annual revenue generated toward natural area conservation and acquisition elsewhere in the County.

The proposal is not consistent with ARC's Metropolitan Transportation Plan.

The project will generate a total of 1,330 daily new car trips

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.

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 two substations proposed.

### **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 for the region. The Plan assigns a relevant growth category designation to all areas in the region and provides corresponding growth policy recommendations for each category.

The site of this DRI is designated in the Plan as Rural Areas. The Plan's general information and policy recommendations for Rural Areas are provided at the end of these comments.

# **Transportation and Mobility Comments**

ARC's Transportation and Mobility Group comments are attached. The proposal is not consistent with ARC's Metropolitan Transportation Plan. Though project connectivity with adjacent Regional Thoroughfares and Regional Truck Routes have been properly addressed, bike and pedestrian conditions could be improved. Appropriate sidewalks and crosswalks should be incorporated throughout. If buildings were consolidated, environmental impacts could be lessened.

Environmental impact should be reduced and mitigated as much as possible. The amount of impermeable surface should be reduced when feasible, and tree shade should be added near pedestrian locations to improve pedestrian conditions on the site. Pedestrian connections should be improved throughout site.

The project will generate a total of 1,330 new vehicular trips; a number of roadway modifications are proposed to mitigate the traffic impact.

GDOT Aviation comments are attached.

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

# **ARC Natural Resource Group Comments**

ARC's Natural Resource Group comments are attached.

ARC recognizes that energy demands will be very high for this project and that related water needs for cooling purposes may create a large peak demand from the Douglasville-Douglas County Water and Sewer Authority. The application proposes 0.018 MGD of water supply demand and 0.018 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 more than 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 an unnamed blue-line tributary of Gothard's Creek, which in turn is a tributary to Sweetwater Creek, crossing the property from the center of the west side of the property then flowing to the northeast. The site plan also shows three tributaries to the unnamed stream, with the southernmost having two branches off its main stem. The project is within the Douglas County Sweetwater Creek watershed. Under the county Unified Development Code (UDC), both the watershed criteria and the stream buffer criteria require a 75-foot impervious surface setback and a 50-foot undisturbed buffer on all "regulated" streams. Under the County UDC Section 903(b), all blue line streams are regulated streams. The submitted site plan shows the County's 75-foot impervious setback and 50-foot undisturbed buffer, as well as the 25-foot State Sediment and Erosion Control buffer, on all streams shown on the property. The only intrusion shown on the blueline stream on the submitted plans is a transportation crossing, which is allowed under the County Code. However, the plans show construction within buffers and over streams on all of the tributaries to the unnamed blue line stream, particularly the southernmost tributary with branches – the site plan shows four buildings, parking areas and several roads sited on top of one or more stream channels, with a proposed substation and other roads intruding into the buffers. Less extensive road, parking area and building sites intrude into the buffers on the two other tributaries.

Under County UDC Section 903(b), non-blue line streams (called other natural watercourses in the UDC) are classified as regulated streams if they possess one or more of the following characteristics, as determined by the Development Services Director based on data analysis and/or field review:

- (1) Evidence of significant water flow along the channel or bed of the watercourse, characterized by one or more of the following: hydraulically sorted sediments: scouring of vegetation and vegetative litter: and loosely rooted vegetation caused by the action of moving water.
- (2) Evidence of hydric soils, hydrophytic vegetation, or wetlands in or around the channel or bed of the watercourse.

No information has been provided on whether the unmapped streams on the property are regulated under the County definition. The determination will need to be made by the County. If these streams are regulated, variances to the County buffer and setback will be required. Regardless of their status as regulated streams, variances will be required for the State 25-foot Sediment and Erosion Control buffer.

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 100 -year floodplain along the unnamed blue-line stream. The FEMA floodplain is shown on the proposed site plan and no intrusions other than one transportation crossing are shown on the plans.

# 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 (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.

# 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.

# **Environmental Comments**

Construction of large portions of the project – including all of buildings 3,4,6 and 7 - will require the destruction of large areas of protected streams which will require stream buffer variances as well as USACE wetlands mitigation.

The project will require clearing of much of the forested portion of the site which will exacerbate local and regional heat island and stormwater impacts. It is recommended that the number of trees removed be replaced by trees planted elsewhere on the site or in Douglas County.

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.

# The Atlanta Region's Plan Growth Policy Considerations: Rural Areas

According to the Atlanta Region's Plan, Rural Areas are those where limited development has taken place or and where development pressure is low. These areas are characterized by sporadic, large single-family lots, agricultural uses, protected lands, and forests. These areas border more central developed and developing areas and represent the limits of the urban service area in the region. There is a strong desire from residents and elected officials in these areas to keep them rural. Increased development threatens existing rural economic uses, such as forestry, agriculture, and tourism.



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

The project is highly incompatible with the Atlanta Region's Plan's policy recommendations for Rural Areas due to its highly negative impact on forested areas and protected streams. The project could be somewhat better aligned with Rural Areas policies through the retention of natural wooded area of the site and the allocation of some of the estimated \$60 million in local Douglas County annual revenue generated toward natural area conservation and acquisition elsewhere in the County.

Douglas County leadership and staff, along with the applicant team, should collaborate closely to ensure sensitivity to the needs of nearby local governments, neighborhoods, and natural systems.

# The following local governments and agencies received notice of this review:

Atlanta Regional Commission Georgia Department of Transportation Georgia Environmental Finance Authority City of Douglasville

Georgia Department of Natural Resource Georgia Regional Transportation Authority Georgia Conservancy City of Villa Rica

GA Department of Community Affairs GA Soil and Water Conservation Com **Douglas 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.





# **Developments of Regional Impact**

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

### **DRI #4334**

### **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@douglascountyga.gov

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

### **Proposed Project Information**

Name of Proposed Project: Stream Data Center

Location (Street Address, Land Lots: 0166, 0186, 0187, District: 02, Section: 5, Parcels: 01660250005 (0 Polk Rd),

GPS Coordinates, or Legal 01660250006 Land Lot Description):

Is property owner different

from developer/applicant?

entirely located within your

Brief Description of Project: 9 data center buildings with a total of 2,687,400 sq. ft., 2 substation areas,

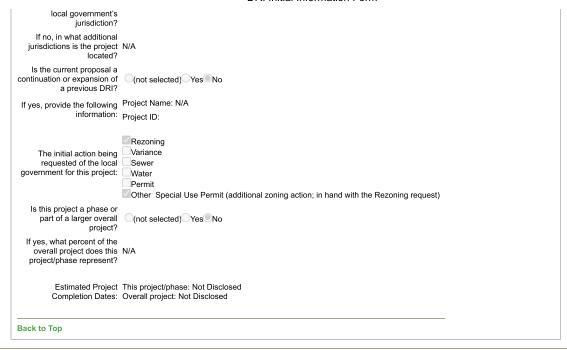
stormwater infrastructure, and an internal access road. Access is proposed to be from Jason Industrial Pkwy and N Baggett Rd.

Development Type:		
(not selected)	Hotels	Wastewater Treatment Facilities
Office	Mixed Use	Petroleum Storage Facilities
Commercial	Airports	Water Supply Intakes/Reservoirs
Wholesale & Distribution	OAttractions & Recreational Facilities	OIntermodal Terminals
Hospitals and Health Care Facilitie	s 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.): 9 data c	enter buildings with a total of 2,687,400 s	q. ft
Developer: SDC AT	LA, LLC	
Mailing Address: 2001 Ro	ss Ave	
Address 2: Suite 40	0	
City:Dal	as State: TX Zip:75201	
Telephone: 214-267	-0400	

Email: sescobar@stream-dc.com

If yes, property owner: Various Property Owners Is the proposed project (not selected) Yes No

(not selected) Yes No



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**DRI Site Map | Contact** 





# **Developments of Regional Impact**

**DRI Home** 

Tier Map

**Apply** 

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# **DRI #4334**

Stream and Wetland Impacts are anticipated with this project, sections of streams and wetlands may be filled to accommodate the development and permitted with USACE. Floodplain will be disturbed with a proposed road crossing.

# **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

### **Local Government Information**

Submitting Local Government:

Douglas

Individual completing form: Austin Cronan

Telephone: 678-838-2060

Email: acronan@douglascountyga.gov

### **Project Information**

Name of Proposed Project: Stream Data Center

DRI ID Number: 4334

Developer/Applicant: Stream Data Centers / Santiago Escobar

Telephone: 678-477-8093

Email(s): sescobar@stream-dc.com

## **Additional Information Requested**

Has the RDC identified any additional information

required in order to proceed

with the official regional (not selected) Yes No review process? (If no,

proceed to Economic

Impacts.)

If yes, has that additional information been provided 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-

\$4.5 Billion at Buildout

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

\$60 Million at Buildout

development:

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

(not selected) Yes No

project?

Will this development

(not selected) Yes No

displace any existing uses?

If yes, please describe (including number of units, square feet, etc):

Water Supply

Name of water supply provider for this site:	Douglasville Douglas County Water & Sewer Authority	
What is the estimated water supply demand to be generated by the project, measured in Millions of Gallons Per Day (MGD)?	0.018 MGD	
Is sufficient water supply capacity available to serve the proposed project?	○(not selected)  Yes  No	
If no, describe any plans to e	expand the existing water supply capacity:	
Is a water line extension required to serve this project?	(not selected) Yes No	
If yes, how much additional	line (in miles) will be required?	
	Wastewater Disposal	
Name of wastewater treatment provider for this site:	Douglasville Douglas County Water & Sewer Authority	
What is the estimated sewage flow to be generated by the project, measured in Millions of Gallons Per Day (MGD)?	0.018 MGD	
Is sufficient wastewater treatment capacity available to serve this proposed project?	C(not selected) Yes No	
If no, describe any plans to e	expand existing wastewater treatment capacity:	
Is a sewer line extension required to serve this project?	(not selected) Yes No	
If yes, how much additional li	ine (in miles) will be required?2.33 Miles	
	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.)	169, 2-way trips in AM peak, 142, 2-way in PM peak & 1,330, 2-way in 24-hours	
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	r:Please see attached DRI Traffic Impact Study	
	Solid Waste Disposal	
How much solid waste is the project expected to generate annually (in tons)?	98.6 Tons	
Is sufficient landfill capacity available to serve this proposed project?	(not selected) Yes No	
If no, describe any plans to e	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		

https://apps.dca.ga.gov/DRI/AdditionalForm.aspx?driid=4334

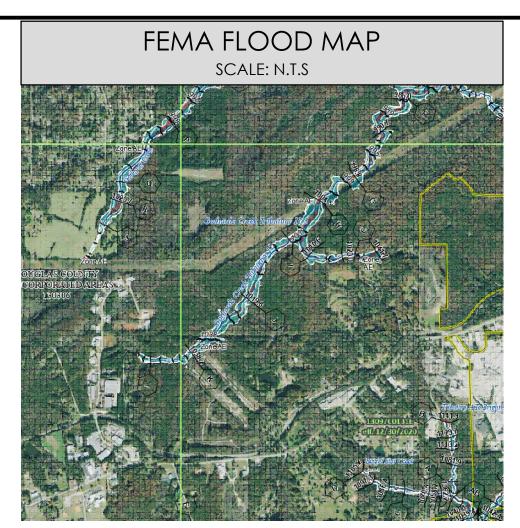
impervious surface once the proposed development has been constructed?				
Describe any measures proposed (such as buffers, detention or retention ponds, pervious parking areas) to mitigate the project's impacts on stormwater management: The site proposes six detention ponds to attenuate peak flows to predevelopment levels. Energy dissipation techniques will be used at outlet locations to minimize erosion.				
Environmental Quality				
Is the development located w	Is the development located within, or likely to affect any of the following:			
Water supply watersheds?	(not selected) Yes No			
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:				
Back to Top				

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DRI Site Map | Contact

# SCALE: 1" = 2000'

SITE LOCATION MAP



CLIENT:

214-267-0400

770-690-9255

SITE PLANNER:

912-234-5300

# DRI NUMBER: #4334 - STREAM DATA CENTER

# SITE PLAN NOTES:

- STATE WATERS AND WETLANDS ARE LOCATED ON SITE AND IDENTIFIED ON THIS PLAN. FINAL AGENCY VERIFICATION TO
- ... 100 and 500 year fema floodplain is present through the site, running from west to east, as a part of GOTHARD'S CREEK TRIBUTARY
- . A REVIEW OF GNAHRGIS DATABASE IDENTIFIED FOUR PREVIOUSLY RECORDED ARCHEOLOGICAL SITES WITHIN THE PROJECT BOUNDARY, ALL OF WHICH WERE DEEMED NOT ELIGIBLE FOR NRHP.
- ALL STORM WATER DETENTION, INTERNAL SITE ACCESS ROADS, AND UTILITIES SHOWN ARE CONCEPTUAL IN NATURE. FINAL LOCATIONS AND SPECIFICATIONS TO BE DETERMINED UPON FINAL DESIGN.
- . SITE PLAN APPROVAL DOES NOT CONSTITUTE APPROVAL OF THE STORM DRAINAGE OR SANITARY SEWER SYSTEM. NO CONSTRUCTION SHALL BEGIN UNTIL CONSTRUCTION PLANS ARE APPROVED AND DEVELOPMENT PERMIT IS OBTAINED.

# SITE DATA SUMMARY:

# <u>PROPERTY</u>

TOTAL PROJECT BOUNDARY - ±275.3 A.C. OPEN SPACE - ± 148.45 A.C., 72.8%

PROPOSED USE - DATA CENTER

PROPOSED ZONING- LI SEE TABLE BELOW FOR INDIVIDUAL PARCEL BREAKDOWN

# **BUILDING STRUCTURES**

9 TOTAL BUILDINGS HEIGHT = 2 STORY

FOOTPRINT = 149,300 S.F. PER BUILDING = 1,343,700 S.F. TOTAL

DENSITY = 2,687,400 SF GROSS FLOOR AREA (GFA) / 275.3 A.C. = 9,761.7 SF/AC FLOOR AREA RATIO (FAR) = 2,687,400SF / (275.3 AC \* 43,560 SF /AC) = 0.224

# PARKING REQUIREMENTS

PROPOSED EMPLOYEE PARKING

73 SPACES PER BUILDING X 9 BUILDINGS = 657 EMPLOYEE SPACES

# REQUIRED EMPLOYEE PARKING:

MAXIMUM PARKING SPACES FOR WAREHOUSE USE - 0.5 EMPLOYEE SPACES PER 1,000 SF OF GROSS FLOOR AREA (GFA)

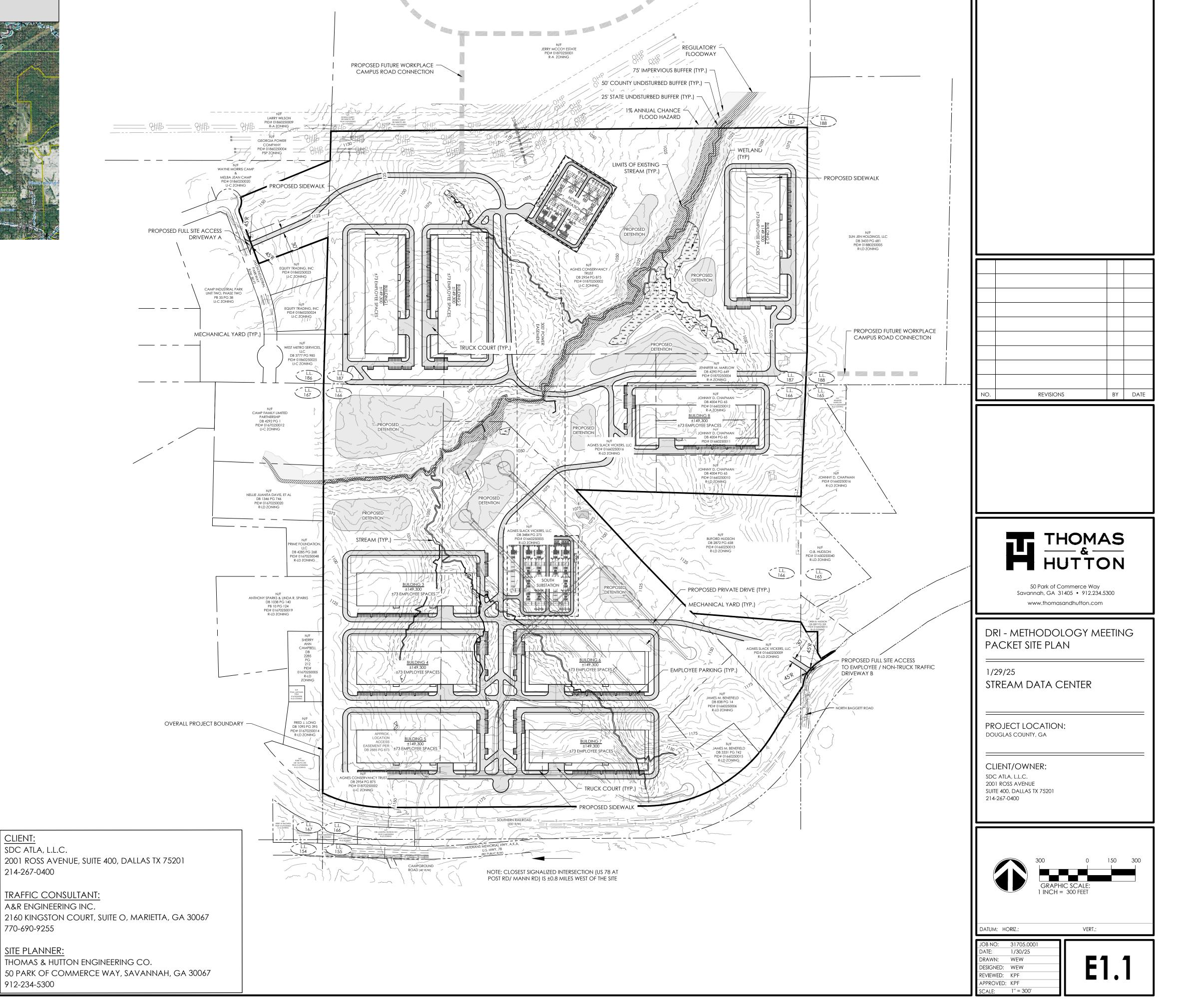
- 149,300 SF PER FLOOR X 2 FLOORS X 9 BUILDINGS = 2,687,400 SF GFA

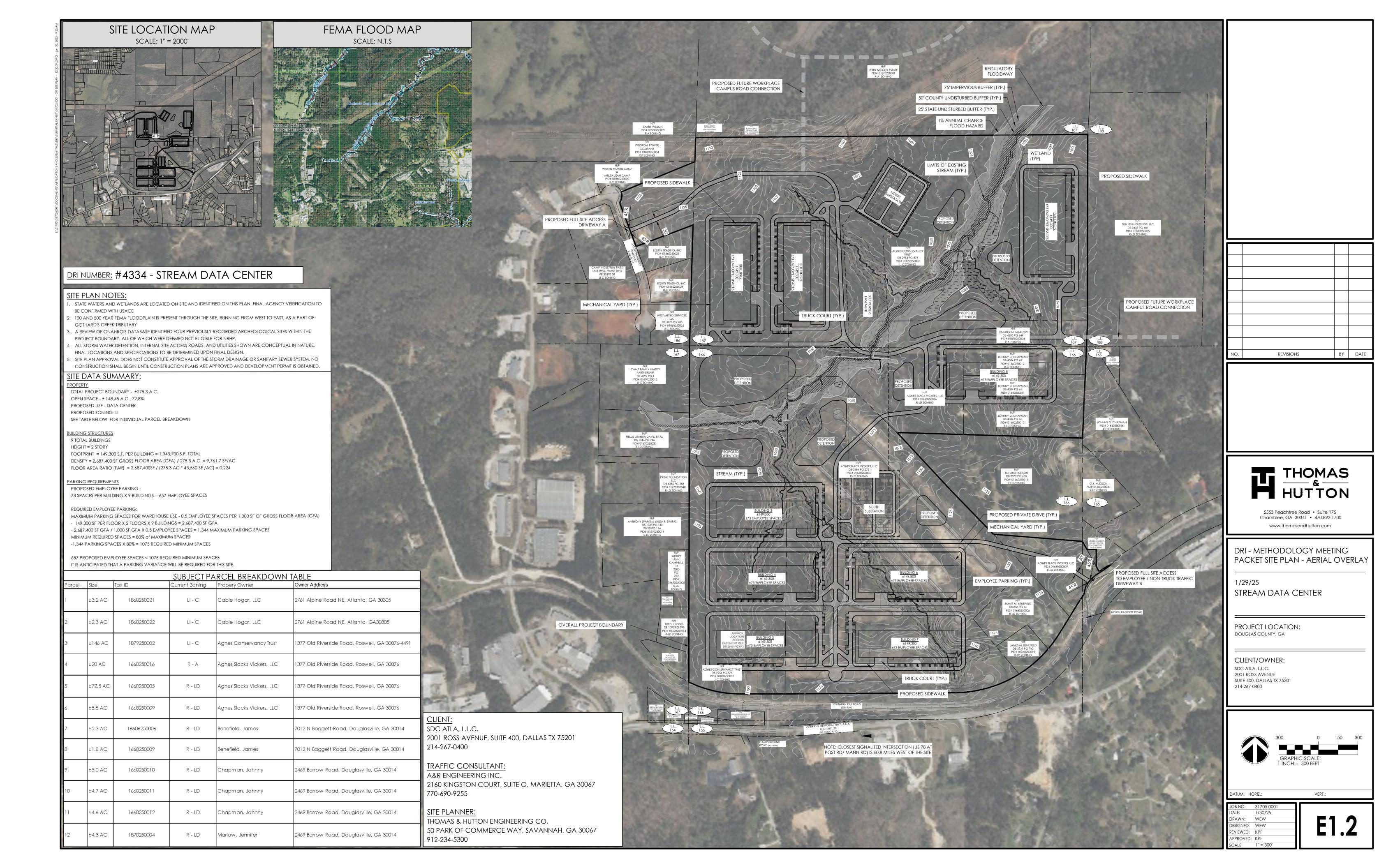
- 2,687,400 SF GFA / 1,000 SF GFA X 0.5 EMPLOYEE SPACES = 1,344 MAXIMUM PARKING SPACES MINIMUM REQUIRED SPACES = 80% of MAXIMUM SPACES

-1,344 PARKING SPACES X 80% = 1075 REQUIRED MINIMUM SPACES

657 PROPOSED EMPLOYEE SPACES < 1075 REQUIRED MINIMUM SPACES IT IS ANTICIPATED THAT A PARKING VARIANCE WILL BE REQUIRED FOR THIS SITE.

IT IS AI	NTICIPATED TH	IAT A PARKING VARIANCE '	WILL BE REQUIRED FOR	THIS SITE.	
	SUBJECT PARCEL BREAKDOWN TABLE				
Parcel	Size	Tax ID	Current Zoning	Propery Owner	Owner Address
1	±3.2 AC	1860250021	LI - C	Cable Hogar, LLC	2761 Alpine Road NE, Atlanta, GA 30305
2	±2.3 AC	1860250022	LI - C	Cable Hogar, LLC	2761 Alpine Road NE, Atlanta, GA30305
3	±146 AC	1879250002	LI - C	Agnes Conservancy Trust	1377 Old Riverside Road, Roswell, GA 30076-4491
4	±20 AC	1660250016	R - A	Agnes Slacks Vickers, LLC	1377 Old Riverside Road, Roswell, GA 30076
5	±72.5 AC	1660250005	R - LD	Agnes Slacks Vickers, LLC	1377 Old Riverside Road, Roswell, GA 30076
6	±5.5 AC	1660250009	R - LD	Agnes Slacks Vickers, LLC	1377 Old Riverside Road, Roswell, GA 30076
7	±5.3 AC	16606250006	R - LD	Benefield, James	7012 N Baggett Road, Douglasville, GA 30014
8	±1.8 AC	1660250009	R - LD	Benefield, James	7012 N Baggett Road, Douglasville, GA 30014
9	±5.0 AC	1660250010	R - LD	Chapman, Johnny	2469 Barrow Road, Douglasville, GA 30014
10	±4.7 AC	1660250011	R - LD	Chapman, Johnny	2469 Barrow Road, Douglasville, GA 30014
11	±4.6 AC	1660250012	R - LD	Chapman, Johnny	2469 Barrow Road, Douglasville, GA 30014
12	±4.3 AC	1870250004	R - LD	Marlow, Jennifer	2469 Barrow Road, Douglasville, GA 30014





# STREAM DATA CENTER DRI

# Douglas County Natural Resources Review Comments April 3, 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 0.018 MGD of water supply demand and 0.018 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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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.

Stream Data Center DRI ARC Natural Resources Comments Page Two April 3, 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 more than 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 an unnamed blue-line tributary of Gothard's Creek, which in turn is a tributary to Sweetwater Creek, crossing the property from the center of the west side of the property then flowing to the northeast. The site plan also shows three tributaries to the unnamed stream, with the southernmost having two branches off its main stem. The project is within the Douglas County Sweetwater Creek watershed. Under the county Unified Development Code (UDC), both the watershed criteria and the stream buffer criteria require a 75-foot impervious surface setback and a 50-foot undisturbed buffer on all "regulated" streams. Under the County UDC Section 903(b), all blue line streams are regulated streams. The submitted site plan shows the County's 75-foot impervious setback and 50-foot undisturbed buffer, as well as the 25-foot State Sediment and Erosion Control buffer, on all streams shown on the property. The only intrusion shown on the blue-line stream on the submitted plans is a transportation crossing, which is allowed under the County Code. However, the plans show construction within buffers and over streams on all of the tributaries to the unnamed blue line stream, particularly the southernmost tributary with branches – the site plan shows four buildings, parking areas and several roads sited on top of one or more stream channels, with a proposed substation and other roads intruding into the buffers. Less extensive road, parking area and building sites intrude into the buffers on the two other tributaries. Under County UDC Section 903(b), non-blue line streams (called other natural watercourses in the UDC) are classified as regulated streams if they possess one or more of the following characteristics, as determined by the Development Services Director based on data analysis and/or field review:

- (1) Evidence of significant water flow along the channel or bed of the watercourse, characterized by one or more of the following: hydraulically sorted sediments; scouring of vegetation and vegetative litter; and loosely rooted vegetation caused by the action of moving water.
- (2) Evidence of hydric soils, hydrophytic vegetation, or wetlands in or around the channel or bed of the watercourse.

No information has been provided on whether the unmapped streams on the property are regulated under the County definition. The determination will need to be made by the County. If these streams are regulated, variances to the County buffer and setback will be required. Regardless of their status as regulated streams, variances will be required for the State 25-foot Sediment and Erosion Control buffer.

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.

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# **Floodplain**

The FEMA coverage for the project area shows 100 -year floodplain along the unnamed blue-line stream. The FEMA floodplain is shown on the proposed site plan and no intrusions other than one transportation crossing are shown on the plans.

# **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 (<a href="https://www.georgiastormwater.com">www.georgiastormwater.com</a>) 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.

# **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.



regional impact + local relevance

# **Development of Regional Impact**

# Assessment of Consistency with the ARC Metropolitan Transportation Plan

Prepared by: Shelby Piccolo (née Stamback), ARC Transportation Access and Mobility Division March 31, 2025

# **DRI INFORMATION**

Stream Data Center DRI 4332 - Douglas County, Georgia

# **Metropolitan Transportation Plan Projects**

Did the transportation analysis incorporate all current MTP projects contained in the study area or along major transportation corridors connecting the study area with adjacent jurisdictions?

There are no MTP projects contained in the study area.

# REC

	·
GIO	NAL NETWORKS
1.	Will the project be directly served by any roadways identified as Regional Thoroughfares? 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
2.	Will the development site be directly served by any roadways identified as Regional Truck Routes? 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
3.	If the development site is within one mile of an existing or planned rail service, provide information on accessibility conditions and transit supportive uses.
	NOT APPLICABLE     ■
	RAIL SERVICE WITHIN ONE MILE
	Rail TOD Comments - N/A
_	If the project is within one wile of evicting an alcohold fixed verte has consisted (including one

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

	BRT TOD Comments - Development is a data center which does not generally support transit ridership.
5.	If the development site is within one mile of an existing or planned multi-use path or trail, provide information on accessibility conditions
	<ul><li>NOT APPLICABLE</li><li> ☐ YES</li></ul>

# OTHER TRANSPORTATION DESIGN CONSIDERATIONS

1. Does the site plan provide for the construction of publicly accessible local road or drive aisle connections, or bike/pedestrian connections, with adjacent parcels?

Connections with adjacent parcels are made where feasible.

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

No. The site does not enable pedestrians and bicyclists to move between destinations within the site safely and conveniently.

3. 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?

No. The site plan does not separate truck traffic from the flow of pedestrians, bicyclists, and motorists within the site.

4. Does the site plan include provisions for electric vehicle charging?

No.

### RECOMMENDATIONS

1. Do the transportation network recommendations outlined in the transportation study adequately mitigate the project's vehicular impact?

The proposal is not consistent with ARC's MTP. Though project connectivity with adjacent Regional Thoroughfares and Regional Truck Routes have been properly addressed, bike and pedestrian conditions could be improved. Appropriate sidewalks and crosswalks should be incorporated throughout. If buildings were consolidated, environmental impacts could be lessened.

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

Environmental impact should be reduced and mitigated as much as possible. The amount of impermeable surface should be reduced when feasible, and tree shade should be added near pedestrian locations to improve pedestrian conditions on the site. Pedestrian connections should be improved throughout site.

From: Hood, Alan C.
To: Donald Shockey

Subject: RE: 2025 Stream Data Center DRI 4334 - Preliminary Report and Comments Request

**Date:** Monday, April 7, 2025 9:37:07 PM

Attachments: image001.png image002.png

image002.png image003.png image004.png image005.png image006.png

### Donald.

This proposed data center is more than 10 miles from any civil airport. 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 (<a href="https://oeaaa.faa.gov/oeaaa/external/gisTools/gisAction.jsp?">https://oeaaa.faa.gov/oeaaa/external/gisTools/gisAction.jsp?</a> action=showNoNoticeRequiredToolForm). Those submissions for any associated cranes may be done online at <a href="https://oeaaa.faa.gov">https://oeaaa.faa.gov</a>. 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



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From: Donald Shockey < DShockey@atlantaregional.org>

**Sent:** Monday, March 24, 2025 6:42 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