



# Regional Review Finding Development of Regional Impact

**DATE:** August 23, 2025

**TO:** Chair and CEO JaNice Van Ness, Rockdale County

**ATTN TO:** Denise Tugman, *Planning Manager*, Rockdale 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:** Project Rockforge DRI 4456

**Submitting Local Government:** Rockdale County

**Date Opened:** August 8, 2025      **Date Closed:** August 23, 2025

**Description:** A DRI review of a proposal to build 4,089,000 SF of data center space in eight two-story buildings on 263-acre mostly forested site traversed by several streams at the SW corner of the intersection of Irwin Bridge Road and Farmer Road in Rockdale County.

**Comments:**

**Key Comments**

*The project is not aligned with applicable Established Suburbs growth policy recommendations - which emphasize the importance of preserving single-family neighborhoods with appropriate infill development - in that data center use does not complement adjacent residential uses. At the same time, data centers also generate little vehicular traffic or other impacts which might conflict with existing residential use.*

*The project’s provision of 144 acres of open space is supportive of regional environmental policies. However, the project’s destructive impacts on several streams is not supportive of regional environmental policies.*

*The project is expected to generate approximately 4,048 daily new vehicular trips.*

*ARC recommends a careful examination by Rockdale Water Resources of its capacity to meet peak-day demands for this project, in addition to other current and projected future peak-day demands. ARC also recommends that the County require installation of advanced “waterless” cooling technologies or “near waterless” technology to reduce project water demand.*

**General Comments**

The Atlanta Region’s Plan, developed by ARC in close coordination with partner local governments, is intended to broadly guide regional development in the 11-county metro region to ensure that required infrastructure and resources are in place to support continued economic development and prosperity. The Plan assigns a relevant growth management category designation, or designations, to all areas in the region. This location is designated as Established Suburbs; corresponding growth policy recommendations are detailed at the end of these comments.

## **Transportation and Mobility Comments**

ARC's Transportation and Mobility comments are attached. The proposal is partially consistent with ARC's Metropolitan Transportation Plan. The project does not have any impact on Regional Truck Routes or Regional Throughfares. There are no EV parking spaces and no provisions for cyclists. Sidewalks have been built within the site to accommodate pedestrians. Site does not connect to greater multimodal networks or transit uses. The project is expected to generate approximately 4,048 new daily vehicular trips.

## **ARC Natural Resources Group Comments**

ARC's Natural Resource comments are attached.

ARC recognizes that energy demands will be very high for this project and that related water needs for cooling purposes will create a large peak demand from Rockdale Water Resources. The application proposes 0.1248 MGD of water supply demand and 0.06241 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 Rockdale Water Resources of its capacity to meet peak-day demands for this project, in addition to other current and projected future peak-day demands. ARC also recommends that the County and Rockdale Water Resources 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.

### *Stream Buffers*

The USGS coverage for the project area and the submitted site plan both show two blue-line tributaries to the Yellow River crossing the project property. The project site plan also shows a short branch off the northwesternmost of the two mapped tributaries. The submitted site plan shows and identifies the 25-foot State Sediment and Erosion Control Buffer as well as the Rockdale County 50-foot undisturbed buffer and the 75-foot impervious setback on all indicated streams. The submitted site plan shows portions of a detention pond, Data Center 1, access roads, driveways and parking areas intruding on the buffers or directly over the streams. While some transportation crossings are exempt under the County ordinance, other activities and intrusions that are not specifically exempted in the County buffer and setback may require variances from Rockdale County and intrusions that are not exempted in the State 25-foot buffer may require variances from Georgia EPD. 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*

Both the FEMA coverage for the project area and the project site plan show a small area of 100 -year floodplain along the easternmost blue-line stream in the northeastern portion of the property. The floodplain area on the site plan is entirely within the stream buffers and no intrusions are shown.

## **Environmental Comments**

The project's provision of 144 acres of open space is supportive of regional environmental policies. However, the project's negative impacts on several streams is not supportive of regional environmental policies. The project could be made more supportive of regional environmental policies by reducing stream impacts. Incorporation of green stormwater and heat island mitigation designs - such as the provision of numerous curbside tree islands in parking areas - where possible would be supportive of regional environmental policies. The project can support The Atlanta Region's Plan in general by incorporating other aspects of regional policy, including green infrastructure and/or low-impact design, e.g., pervious pavers, rain gardens, vegetated swales, etc., in parking areas and site driveways, and as part of any improvements to site frontages.

## **GDOT Aviation Comments**

Comments received from GDOT aviation are attached.

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

According to the Atlanta Region's Plan, Established Suburbs are areas where suburban development has occurred and are characterized by single-family subdivisions, commercial development, and office, industrial and multi-family development. These areas represent the part of the region that has recently reached "build-out." With few remaining large parcels for additional development, these are the areas in which the region may see the least amount of land-use change outside of retail and commercial areas. While there is still room for limited infill development, these areas will begin to focus more on redevelopment over the next 30 years. Preservation of existing single-family neighborhoods is important, and wholesale change will most likely not occur in the single-family subdivisions that make up a majority of these areas. However, infill and redevelopment will occur in areas of retail/commercial concentrations, especially commercial corridors.

The project is not aligned with Established Suburbs recommendations in that it does not complement adjacent residential neighborhoods. While it preserves a large amount of open space, it also proposes destroying multiple stream areas. It could be made more supportive of regional environmental policies by reducing stream impacts. Rockdale County leadership and staff, along with the applicant team, should collaborate closely to ensure maximum sensitivity to the needs of nearby local governments, neighborhoods, land uses and natural systems.

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

Atlanta Regional Commission Affairs	Georgia Department of Natural Resource	Georgia Department of Community
Georgia Department of Transportation Commission	Georgia Regional Transportation Authority	Georgia Soil and Water Conservation
Georgia Environmental Finance Authority	Georgia Conservancy	City of Conyers
City of Stonecrest	Dekalb County	

*For questions, please contact Donald Shockey at (470) 378-1531 or [dshockey@atlantaregional.org](mailto:dshockey@atlantaregional.org).*

*This finding will be published to the ARC review website located at <http://atlantaregional.org/plan-reviews>.*



## Developments of Regional Impact

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Thank you for submitting your application. The DRI Application Number is 4456. To view the application at any time, you can go to <http://apps.dca.ga.gov/DRI/AppSummary.aspx?driid=4456>. Please contact your RDC if you have any questions or need to change any of the information on this form.

### DRI #4456

#### 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: Rockdale County

Individual completing form: Denise Tugman

Telephone: 770278-7124

E-mail: [denise.tugman@rockdalecountyga.gov](mailto:denise.tugman@rockdalecountyga.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: Project Rockforge

Location (Street Address, 2000 Irwin Bridge Road, Conyers, GA 30012 (Parcel IDs: 041001008B, 0410010004) GPS Coordinates, or Legal Land Lot Description):

Brief Description of Project: Eight Buildings (Totaling 4,089,000 SF) and access roads from NW Irwin Bridge Road and Farmer Road NW.

#### Development Type:

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

If other development type, describe:  
Technology Park

Project Size (# of units, floor area, etc.): 263 Acres/ (2,044,500 SF)

Developer: MMM Acquisitions LLC

Mailing Address: 8735 DUNWOODY PLACE, STE N

Address 2:

City: ATLANTA State: GA Zip: 30350

Telephone: (678) 405-9363

Email: [mmmacquisitions@gmail.com](mailto:mmmacquisitions@gmail.com)

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

If yes, property owner: GCJT2 LLC

Is the proposed project entirely located within your local government's jurisdiction?  (not selected)  Yes  No

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: 2028  
Overall project: 2032

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## Developments of Regional Impact

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**DRI #4456**

### 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: Rockdale County

Individual completing form: Denise Tugman

Telephone: 770278-7124

Email: denise.tugman@rockdalecountyga.gov

#### Project Information

Name of Proposed Project: Project Rockforge

DRI ID Number: 4456

Developer/Applicant: MMM Acquisitions LLC

Telephone: (678) 405-9363

Email(s): mmmacquisitions@gmail.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: \$8,953,374,500

Estimated annual local tax revenues (i.e., property tax, sales tax) likely to be generated by the proposed development: \$74,165,704

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):

One residential house totaling 1864 SF

#### Water Supply

Name of water supply provider for this site: Rockdale County Water Resources

What is the estimated water supply demand to be generated by the project: 1,248 GPD

measured in Millions of Gallons Per Day (MGD)?

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

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

[Empty text box for water supply capacity expansion plans]

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?

[Empty text box for additional water line length]

**Wastewater Disposal**

Name of wastewater treatment provider for this site:

Rockdale County Water Resources

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

.06241 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:

[Empty text box for wastewater treatment capacity expansion plans]

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?

.11

**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.)

Daily Trips: 4,048 AM Peak Hour Trips: 289 entering and 237 ex

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:

See detailed traffic study for more information

[Empty text box for describing transportation improvements]

**Solid Waste Disposal**

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

100.67 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:

[Empty text box for landfill capacity expansion plans]

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

If yes, please explain:

[Empty text box for explaining hazardous waste generation]

**Stormwater Management**

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

46%

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

Two stormwater detention ponds will be located on the site, a parking variance will be applied for, to reduce unused parking spaces and impervious surfaces.

### 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:

None of the floodplains are impacted on site, but wetlands mitigation will be required to reach full buildout.

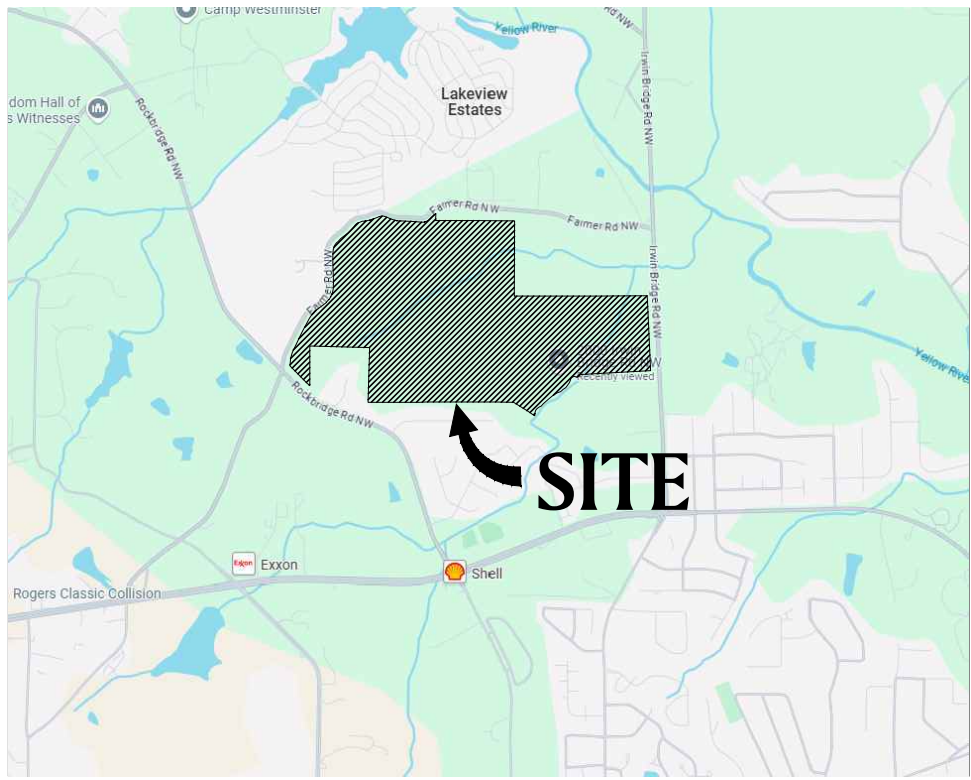
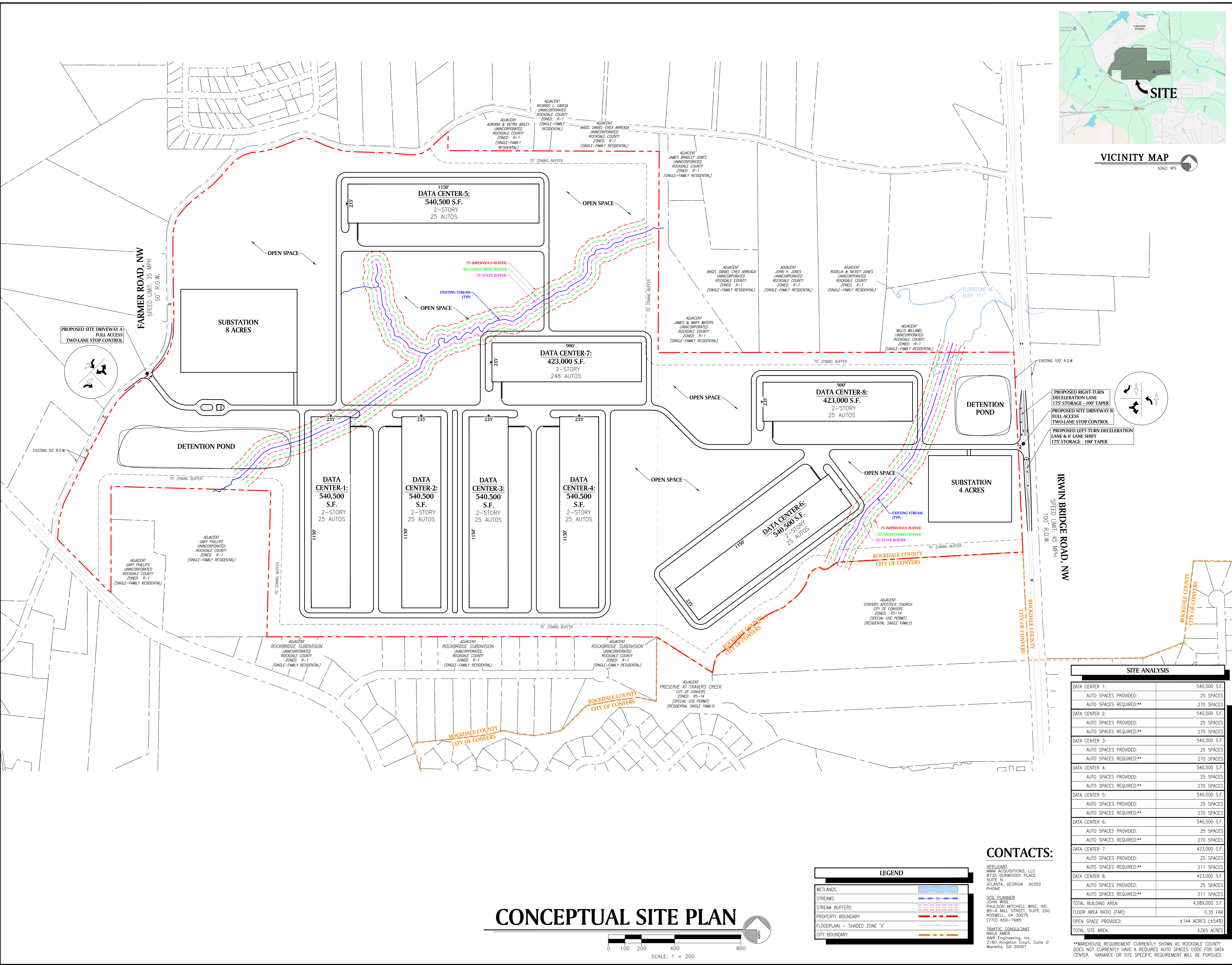
**Submit Application**

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**PAULSON-MITCHELL-WISE**  
 CIVIL ENGINEERS & PLANNERS  
 INFO@CIVILPMW.COM  
 770.650.7685  
 CIVILPMW.COM  
 85-A MILL STREET  
 SUITE 200  
 ROSWELL, GA 30075

PROJECT:  
**PROJECT ROCKFORGE DRI #4456**  
 2000 IRWIN BRIDGE ROAD, CONYERS, GA  
 PARCELS: 041001008B AND 0410010004  
 UNINCORPORATED ROCKDALE COUNTY, GEORGIA  
 FOR:  
**MMM ACQUISITIONS, LLC**  
 8735 DUNWOODY PLACE, SUITE N ATLANTA, GEORGIA 30350

**ZONING INFORMATION**  
**ZONING CLASSIFICATION**  
 JURISDICTION: UNINCORPORATED ROCKDALE COUNTY  
 EX. ZONING: CRS (COLLABORATIVE RESIDENTIAL SUB) OVERLAY DISTRICT  
 PR. ZONING: M-1 (LIMITED INDUSTRIAL DISTRICT)  
**BUILDING SETBACKS**  
 FRONT: 40'  
 MAJOR SIDE: 50' (CORNER LOT)  
 MINOR SIDE: 25'  
 REAR: 50'  
**BUFFERS**  
 LANDSCAPE STRIP: 20' FRONT | 10' SIDE & BACK  
 ZONING BUFFER: 75' ADJ TO RES | 50' ADJ TO C-1 & C-2  
 STATE STREAM BUFFER: 25'  
 COUNTY STREAM BUFFER: 50' (UNDISTURBED)  
 CITY STREAM BUFFER: 75'  
**PARKING SUMMARY**  
 WAREHOUSE REQ.: 1 PER 2,000 SF OF GFA  
 STALL: 9' X 19'  
 LANDSCAPE ISLAND SPACING: 1 PER 8 SPACES  
**LANDSCAPE REQ'S**  
 MAXIMUM IMPERVIOUS ALLOWED: 75%  
 MAXIMUM BUILDING COVERAGE: 30%  
**ENVIRONMENTAL**  
 FLOOD PLAN PRESENT (NO): FEMA/ROCKDALE GIS  
 STREAMS PRESENT (NO): NWI/ROCKDALE GIS  
 WETLANDS PRESENT (NO): NWI/ROCKDALE GIS  
 TOPOGRAPHY DATA: ROCKDALE COUNTY GIS  
 2025158 DRI.dwg 07.24.25  
**CONCEPTUAL SITE PLAN**  
**SHEET CP-1**

SITE ANALYSIS	
DATA CENTER 1:	540,500 S.F.
AUTO SPACES PROVIDED:	25 SPACES
AUTO SPACES REQUIRED:**	270 SPACES
DATA CENTER 2:	540,500 S.F.
AUTO SPACES PROVIDED:	25 SPACES
AUTO SPACES REQUIRED:**	270 SPACES
DATA CENTER 3:	540,500 S.F.
AUTO SPACES PROVIDED:	25 SPACES
AUTO SPACES REQUIRED:**	270 SPACES
DATA CENTER 4:	540,500 S.F.
AUTO SPACES PROVIDED:	25 SPACES
AUTO SPACES REQUIRED:**	270 SPACES
DATA CENTER 5:	540,500 S.F.
AUTO SPACES PROVIDED:	25 SPACES
AUTO SPACES REQUIRED:**	270 SPACES
DATA CENTER 6:	540,500 S.F.
AUTO SPACES PROVIDED:	25 SPACES
AUTO SPACES REQUIRED:**	270 SPACES
DATA CENTER 7:	423,000 S.F.
AUTO SPACES PROVIDED:	25 SPACES
AUTO SPACES REQUIRED:**	211 SPACES
DATA CENTER 8:	423,000 S.F.
AUTO SPACES PROVIDED:	25 SPACES
AUTO SPACES REQUIRED:**	211 SPACES
TOTAL BUILDING AREA:	4,089,000 S.F.
FLOOR AREA RATIO (FAR):	0.35 FAR
OPEN SPACE PROVIDED:	±144 ACRES (±54%)
TOTAL SITE AREA:	±265 ACRES

**CONTACTS:**  
 APPLICANT  
 MMM ACQUISITIONS, LLC  
 8735 DUNWOODY PLACE  
 SUITE N  
 ATLANTA, GEORGIA 30350  
 PHONE  
 (770) 650-7685  
 SITE PLANNER  
 JOHN WISE  
 PAULSON MITCHELL WISE, INC.  
 85-A MILL STREET, SUITE 200  
 ROSWELL, GA 30075  
 (770) 650-7685  
 TRAFFIC CONSULTANT  
 NALIA AMER  
 A&R Engineering, Inc.  
 2150 Kingston Court, Suite 0  
 Marietta, GA 30067

LEGEND	
WETLANDS	[Symbol]
STREAMS	[Symbol]
STREAM BUFFERS	[Symbol]
PROPERTY BOUNDARY	[Symbol]
FLOODPLAIN - SHADED ZONE 'X'	[Symbol]
CITY BOUNDARY	[Symbol]

**CONCEPTUAL SITE PLAN**  
 SCALE: 1" = 200'  
 0 100 200 400 800



# Development of Regional Impact

## Assessment of Consistency with the ARC Metropolitan Transportation Plan

Prepared by: Shelby Piccolo, ARC Transportation Access and Mobility Division August 23, 2025

### DRI INFORMATION

2025 Project Rockforge DRI 4456 – Conyers, GA; Rockdale County

### 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?

Yes. ARC IDs for PI 0013594 are RO-235D and RO-235D-3B. ARC ID for PI 0012886 is RO-256. These IDs are missing from Table 5.

### REGIONAL 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
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.  
 NOT APPLICABLE

YES

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

NOT APPLICABLE

YES

Sigman Road Multiuse Path (planned)

Distance *1 Mile*

Walking Access\* *Multiuse path is not walkable or bikeable from site.*

### **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?**

No.

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

No.

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?**

N/A

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 partially consistent with ARC's MTP. The project does not have any impact on Regional Truck Routes or Regional Throughfares. There are no EV parking spaces and no provisions for cyclists. Sidewalks have been built within the site to accommodate pedestrians. Site does not connect to greater multimodal networks or transit uses.

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

Consider mitigating possible negative impacts on environment and surrounding residential uses.

**PROJECT ROCKFORGE DRI**  
**Rockdale County**  
**Natural Resources Review Comments**  
**August 15, 2025**

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 Rockdale Water Resources. The application proposes 0.1248 MGD of water supply demand and 0.06241 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 Rockdale Water Resources of its capacity to meet peak-day demands for this project, in addition to other current and projected future peak-day demands. ARC also recommends that the County and Rockdale Water Resources require the installation of advanced "waterless" cooling technologies or "near waterless" technology to reduce the burden on the drinking water supplies and increase the resiliency for both the project and the potable water system.

**Additional Water Resources Comments**

While ARC and the Metropolitan North Georgia Water Planning District have no regulatory or review authority over this project, the Natural Resources Group has identified County and State regulations that could apply to this property. Other regulations may also apply that we have not identified.

**Watershed Protection**

The project property is located in the Yellow River watershed which in turn is part of the South River watershed. While neither is a water supply watershed for the Atlanta Region or the Metropolitan North Georgia Water Planning District, the South River is classified as a large water supply watershed (over 100 square miles) downstream of the District and the Region 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 public water supply intake and no water supply watershed criteria apply.

**Stream Buffers**

The USGS coverage for the project area and the submitted site plan both show two blue-line tributaries to the Yellow River crossing the project property. The project site plan also shows a short branch off the northwesternmost of the two mapped tributaries. The submitted site plan shows and identifies the 25-foot State Sediment and Erosion Control Buffer as well as the Rockdale County 50-foot undisturbed buffer and the 75-foot impervious setback on all indicated streams. The submitted site plan shows portions of a detention pond, Data Center 1, access roads, driveways and parking areas intruding on the buffers or directly over the streams. While some transportation crossings are exempt under the County ordinance, other activities and intrusions that are not specifically exempted in the County buffer and setback may require variances from Rockdale County and intrusions that are not exempted in the State 25-foot buffer may require variances from Georgia EPD.

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.

**Project Rockforge DRI**  
**ARC Natural Resources Comments**  
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**August 15, 2025**

**Floodplain**

Both the FEMA coverage for the project area and the project site plan show a small area of 100 -year floodplain along the easternmost blue-line stream in the northeastern portion of the property. The floodplain area on the site plan is entirely within the stream buffers and no intrusions are shown.

**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 (GSMM) ([www.georgiastormwater.com](http://www.georgiastormwater.com)) such as design standards, calculations, formulas, methods, and runoff reduction practices sized and designed to retain the first 1.0 inch of rainfall on the site to the maximum extent practicable. Detention ponds do not receive runoff reduction credit in the GSMM Volume 2. See Table 4.1.3-1 for additional guidance.

Where possible, the project should use stormwater better site design practices included in the GSMM, 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 Rockdale 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. Rockdale 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 Rockdale 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.

**From:** [Hood, Alan C.](#)  
**To:** [Donald Shockey](#)  
**Subject:** RE: 2025 Project Rockforge DRI 4456 - Preliminary Report and Comments Request  
**Date:** Tuesday, August 19, 2025 1:29:49 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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Donald,

This proposed building of a 4,089,000 SF data center space in eight two-story buildings on 263-acre mostly forested site traversed by several streams at the SW corner of the intersection of Irwin Bridge Road and Farmer Road in Rockdale County is located outside of any FAA approach or departure surfaces, and airport compatible land use areas, and does not appear to impact any airport.

However, if 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/oe3a/main/#/noticePrescreen>). Those submissions for any associated cranes may be done online at <https://oeaaa.faa.gov>. The FAA must be in receipt of the notifications, no later than 120 days prior to construction. The FAA will evaluate the potential impacts of the project on protected airspace associated with the airports and advise the proponent if any action is necessary.

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

**Alan Hood**

*Airport Safety Data Program Manager*



*Aviation Programs*

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

**Sent:** Friday, August 8, 2025 3:46 PM

**To:** chuck.mueller@dnr.state.ga.us; gaswcc.swcd@gaswcc.ga.gov; hhill@gefafa.ga.gov; Jon West <jon.west@dca.ga.gov>; kmoore@gaconservancy.org; nongame.review@dnr.ga.gov;