
DEVELOPMENTS OF REGIONAL IMPACT (DRI) *REPORT OF FINDINGS*

Project ID: DRI #4301
Project Name: Project Peach
Name of Host Jurisdiction: Coweta County
Date: February 4, 2025

The Three Rivers Regional Commission (TRRC) has completed its review of the Development of Regional Impact (DRI) for DRI #4301 – Project Peach, a proposed data center project to be located in Coweta County, GA. The trigger for the DRI in this project is a rezoning request; the threshold exceeded is the size of the proposed development. TRRC conducted a careful review of the information submitted by the local government, adopted plans and road data, and comments from potentially affected agencies. Potentially affected parties were requested to submit comments on the proposed project during the fifteen-day period of January 15, 2025 to January 30, 2025.

Project Overview

The developer, North Coweta Investors, LLC, is proposing a 2,100,000 square foot data center project (in 8 buildings) on an approximately 320-acre site (approximate location can be found at this [Google link](#)). The site is located in unincorporated Coweta County near the City of Palmetto, and is adjacent to SR 14/US 29 and Weldon Road. The developer is requesting a rezoning from RC (Rural Conservation) to LM (Light Industrial). The project design proposes four (4) driveways, with one (1) site driveway and three (3) proposed emergency/maintenance driveways. The proposed build out completion timeframe for the project is 2036, pending approval from necessary parties.

Context in Regional Plan and Regional Resource Plan. TRRC reviewed the proposed project with regards to regional and interjurisdictional impact and consistency with the Department of Community Affairs (DCA) Quality Community Objectives, the [Three Rivers Regional Plan 2024](#), the [Three Rivers Regionally Important Resource Plan](#), and other local and regional plans.

- Per the Three Rivers Regionally Important Resource Plan, the proposed site is proximate to both the Flint River and Chattahoochee watersheds; the Flint River and Chattahoochee Rivers are designated Regionally Important Resources (p. 11). Watersheds are vulnerable to land uses, including construction activities, which can have a large point and non-point impacts on water supply, pollution, and erosion. Stakeholders are encouraged to closely collaborate to reduce vulnerabilities to the watersheds through low-impact site design and data center technology that incorporates advanced cooling technologies to reduce the burden on the drinking water system.
- According to the 2024 Three Rivers Regional Plan, the proposed development site is within the Developing Areas classification within the Regional Land Use and Conservation and Development maps of. The site also lies within the Areas of Rapid Development of the Areas Requiring Special Attention Map (maps attached, located in the plan starting on page 18).

- The site is proximate to the City of Palmetto. TRRC encourages stakeholders to incorporate the desired development patterns and implementation measures for Areas of Rapid Development (discussed starting on page 23), including:
 - Increased accessibility and safety for all users including vehicles, pedestrians, and cyclists
 - Site and building designs should be sensitive to the site's natural features and environmental characteristics

Context within Comprehensive Planning

According to the [Coweta County Comprehensive Plan \(2021\)](#):

- This site is located in the Priority Development Character Area (map on page 85, discussion starts on page 83) which is “meant to allow for innovative designs that may not fit within the confines of established zoning districts”. Character areas provide a vision, goals, corresponding zoning, relevant density, and growth and design strategies to emphasize local character and facilitate cohesive design.
- The site is located in the Growth Priority tier on the Growth Strategy Map (map on page 168, discussion of this tier starts on page 179). The growth strategy tiers are to encourage growth, density and land use to areas that can best accommodate it with existing infrastructure.
- County decision-makers should use the comprehensive plan to ensure land use decisions align with the community vision, character areas, and growth strategy.

Natural Resources Planning and Resiliency Considerations

The proposed development proposes several large buildings that will cover the site in 35-40% impervious surfaces, with several stormwater ponds proposed to manage stormwater runoff. The site contains several streams and stream crossings, with the site plan and QPublic showing it includes future flooding areas.

- The project design should incorporate low impact design to minimize disruption to the existing hydrology to prevent impacts to the site's absorption capacity as well as reduce impacts to water quality downstream. An abundance of caution and proactive water planning should be used. Flood maps have not always been updated to reflect development over the last decade, while Coweta County's population has grown substantially over the last two decades.
- The [Georgia Stormwater Manual](#) should be used in the site design of this project. Per the manual: Addressing stormwater management begins with the site planning and design process. Development projects can be designed to reduce their impact on watersheds when efforts are made to conserve natural areas, reduce impervious cover, and better integrate stormwater treatment. By implementing a combination of these nonstructural approaches, collectively known as Better Site Design (BSD), it is possible to reduce the amount of runoff and pollutants generated by a site and provide for some nonstructural on-site treatment and control of runoff. (p. 41)
- The proposed development is within the Metropolitan North Georgia Water Planning District, which works to protect water quality and supply in the District as well as downstream communities. Coweta County and the developer are encouraged to follow the planning principles in the [2022 Water Resources Management Plan](#), such as utilizing green infrastructure approaches found on page 2-3.
- Coweta County should ensure that its water supply capacity is sufficient to meet the demands of the project. The County should consider requiring the installation of cooling technologies that minimize water consumption to reduce the strain on the local water supply.
- The county is encouraged to dedicating some of the substantial tax revenue generated from this project to the acquisition of environmentally sensitive land elsewhere in the county to increase local resiliency.

Connectivity and Road Safety

- Per the traffic impact study, the project is expected to generate 2,080 daily new trips. Consideration also needs to be given to the traffic impacts of the project during the construction phase, as projects of this scale can become major construction sites that impact nearby roadways. Stakeholders are encouraged to consult with other jurisdictions that have had recent data center construction projects to discuss best practices and lessons learned.
- This project site is near the intersection of Weldon Road and SR 14/US 29, which per the 2021 Coweta County Comprehensive Transportation Plan's [Recommendations Report](#) is a congested roadway segment (p. 24). All stakeholders are encouraged to work together to ensure road safety and congestion is addressed in this project.
- The site's road network feeds into Coweta County and state-owned roads; with many of these roads being rural in nature (e.g. two-lanes), but highly used. The 5-year data for vehicle crashes is attached for all crashes as well as serious and fatal injury crashes, with this proposed project near roads with multiple crash locations. Per this data, over 64% of all crashes in Coweta County were intersection-related, over 54% were distracted-driver related, and close to 6% were large truck related.

Comments

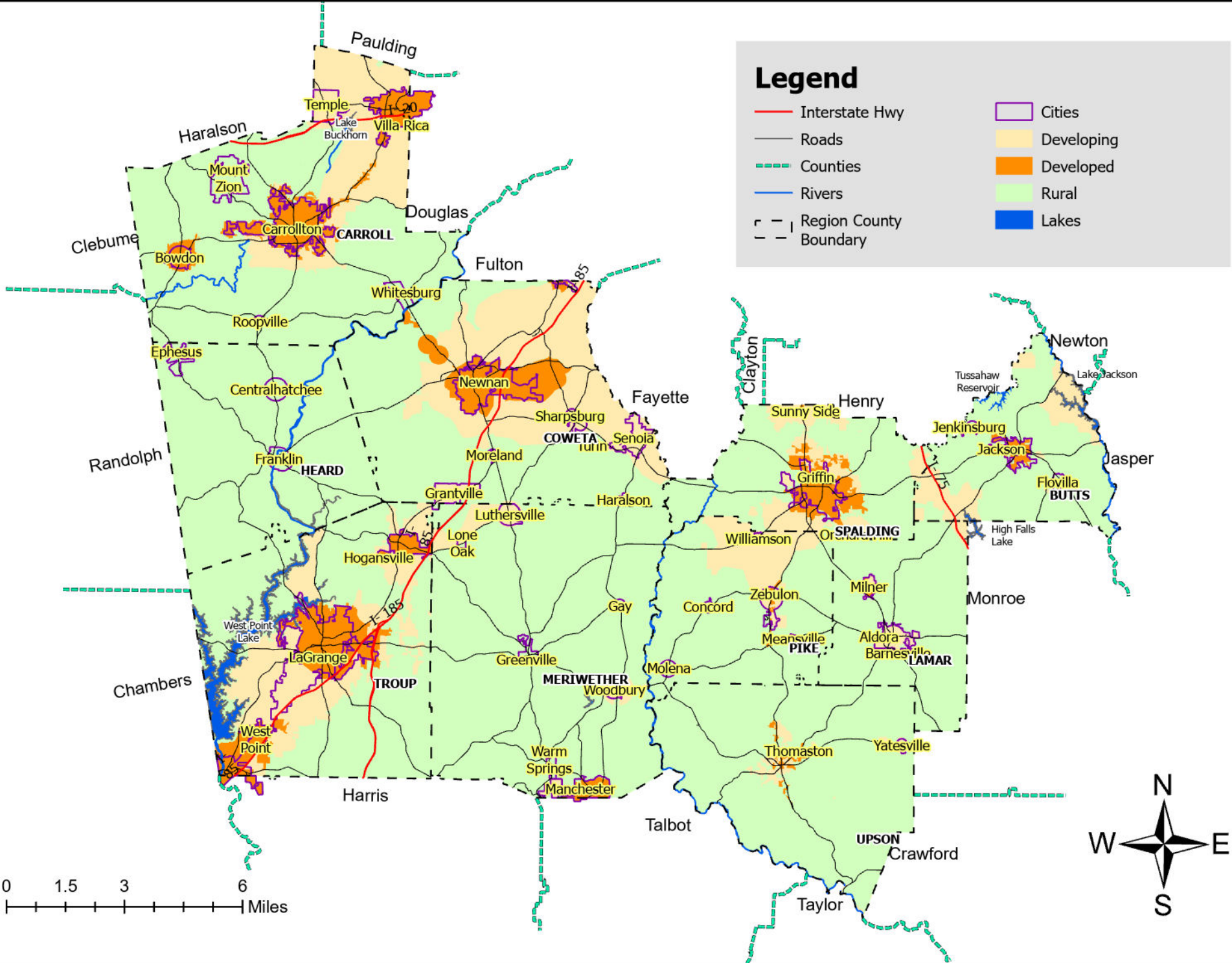
Comments for this project were received from GDOT and Chattahoochee Riverkeeper. These documents are attached in this report.

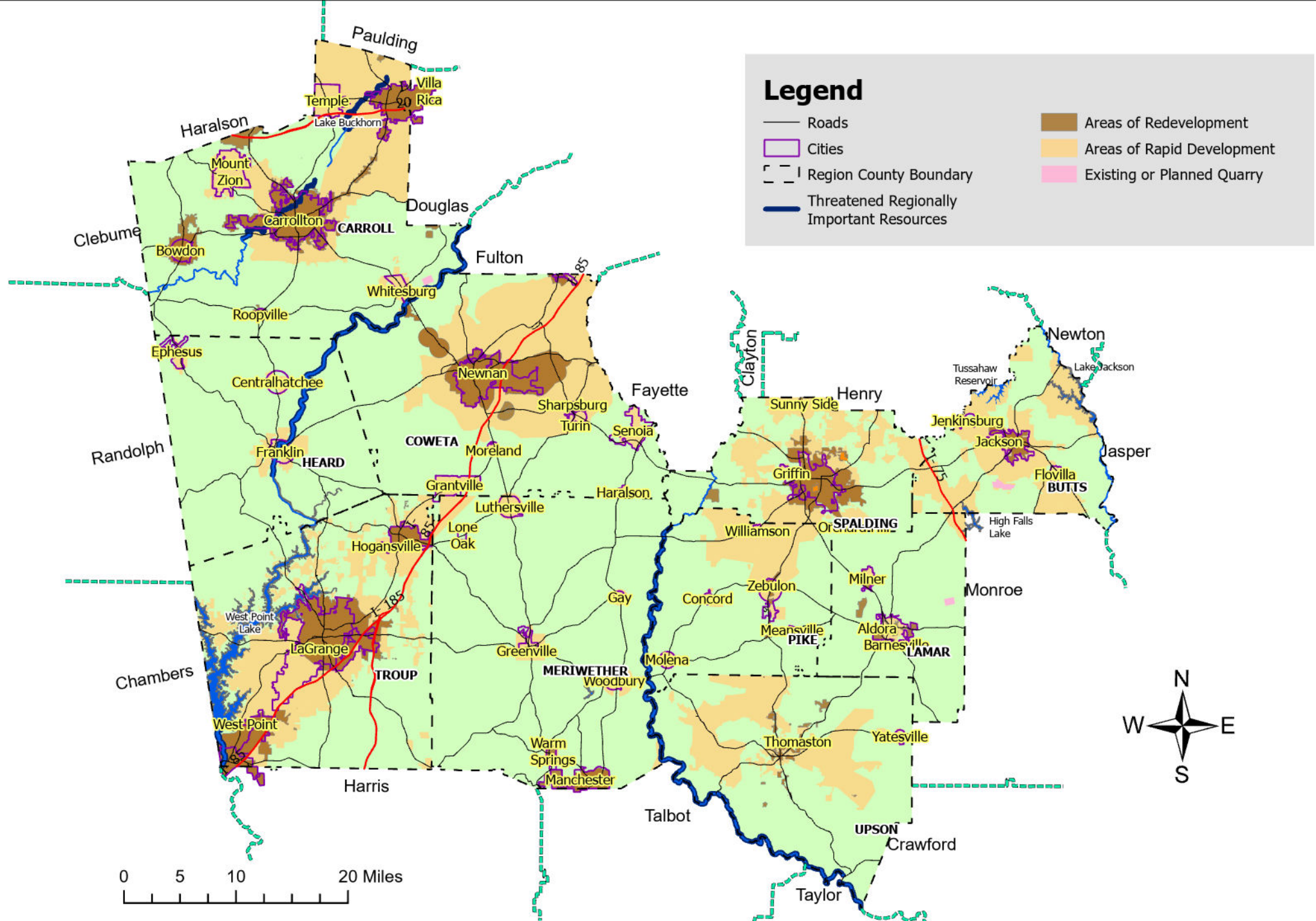
Transmittal

The transmittal of this Report of Findings officially completes the DRI process. Coweta County may proceed with the final official action it deems appropriate regarding the proposed project, but it is encouraged to take the materials presented in the DRI report into consideration when rendering its decision. The enclosed information is advisory in nature and under no circumstances should be considered as binding or infringing upon the host jurisdiction's right to determine for itself the appropriateness of development within its boundaries. This DRI Review was performed in coordination with the GRTA review of DRI #4301.

Attachments

- Three Rivers Regional Plan Maps
- Comments
- QPublic screenshot of future flooding in site area
- Coweta County Crash Data (All Crashes and Life-Altering (KA) Crashes)





**Three Rivers Regional Commission
Development of Regional Impact (DRI)
Comments from Affected Parties**

Project ID: DRI #4301 – Project Peach (Coweta County)

Commenting Organization: Georgia Department of Transportation

Street Address: 115 Transportation Blvd

City: Thomaston **State:** GA **Zip Code:** 30286

Contact Person: Daniel Trevorrow **Phone:** 706-646-7591 **Email:** dtrevorrow@dot.ga.gov

**Do you believe your jurisdiction will be affected
by the proposed development?**

YES



NO

☐

**Please describe the effects (positive or negative) that the proposed project could have on your jurisdiction
(please attach additional pages, if necessary):**

GDOT is amenable to the two proposed, gated, emergency/maintenance only access points on SR 14/US 29 providing they are used for those purposes only and are indeed gated. Should it be desired to use either for regular full site access, then Sr 14 improvements should be required as part of that, and GDOT may not be amenable to the retention of both SR 14 access points. There should be further coordination with Coweta County and GDOT regarding construction phasing and schedules, and mitigation of impacts associated with construction traffic. As part of this Coweta and GDOT should be consulted on routes to be used by construction traffic. As part of this coordination, it may be necessary for further traffic studies to be produced and turn lane or other intersection improvements may be necessary to handle the construction traffic. To accommodate full build out and regular site generated traffic post project completion, the SR 14 southbound left turn lane should be extended at its intersection with Weldon Way. The I-85 southbound right turn lane on the exit ramp to Collinsworth Rd should also be extended, as well as the Collinsworth Rd left turn lanes at the I-85 southbound ramps and/or northbound ramps. A Special Encroachment permit will need to be submitted to GDOT for any work proposed to be done in the State right-of-way.

Form Completed by: Daniel Trevorrow, P.E.

Title: District Traffic Engineer

Signature: 

Date: 01/21/2025

Mail or Email this form to:

Stephanie Wagner, Planner
Three Rivers Regional Commission
P.O. Box 818 - Griffin, GA 30224
P: 678-692-0510
Email : swagner@threeriversrc.com

Comments on DRI #4301 will be accepted beginning Wednesday, January 15, 2025.

All comments are due by Thursday, January 30, 2025.



CHATTAHOOCHEE RIVERKEEPER®

January 30, 2025

Stephanie Wagner, AICP, Planner
Three Rivers Regional Commission
PO Box 818
20 N. Hill St.
Griffin, GA 30224

Submitted via email to: swagner@threeriversrc.com

RE: [DRI #4301, Project Peach, Coweta County](#)

Dear Ms. Wagner,

Chattahoochee Riverkeeper thanks the Three Rivers Regional Commission for the opportunity to submit these comments regarding the proposed “Project Peach” data center campus development in Coweta County, known as DRI #4301.¹

Established in 1994, Chattahoochee Riverkeeper (CRK) is an environmental advocacy and education organization with more than 10,000 members dedicated to making the Chattahoochee River a sustainable resource for the five million people who depend on it. Our mission is to advocate and secure the protection and stewardship of the Chattahoochee River, its lakes, tributaries, and watershed, in order to restore and preserve their ecological health for the people and wildlife that depend on one of the Southeast’s hardest working rivers.

Our general comments on the DRI are as follows:

1. Introduction
2. Why are there data centers in Georgia?
3. Project Peach may include an operational interbasin transfer (IBT).
4. Data center water demand and consumptive use are largely unknown.
5. The cumulative impact of data center water demand and consumptive use will increase in the future.
6. Conclusion

¹ [TRRC Request for Comments - DRI #4301 - Project Peach - Coweta](#)

1. Introduction

Over the last few years, public interest in data centers has grown considerably. These facilities have become more visible due to their increasing demands on our water resources and electric infrastructure, their growing physical size, and their community and environmental impacts.

Data centers are buildings filled with computer equipment to process internet traffic, facilitate cloud computing and artificial intelligence, and store increasingly massive amounts of digital data.

Among the major challenges, today's large data centers require massive amounts of energy and water for cooling systems to keep the computer equipment from overheating. However, we do not know with certainty how much because data center operators, and energy and water providers, are not required to report demand or usage. Land disturbance during the construction phase is also a concern. Chattahoochee Riverkeeper (CRK) has been tracking data center development as communities organize to address construction and operation in Georgia, Virginia and other states.² CRK has observations, concerns and questions:

- ❖ Water: When it comes to water consumption, data center projects do not always provide the correct or enough data. How much water are we talking about, is there enough and do we have enough information for future planning in a region prone to "flash droughts" and known for conflict over water supply that advanced all the way to the U.S. Supreme Court?
- ❖ Land disturbance: At full buildout, multi-building data center campuses can have significant land impact. Large, land-disturbing projects, if not properly engineered and maintained, can dump dirt into creeks and streams. A Fayetteville data center campus—another of the state's largest—has struggled to manage soil erosion on a 600-acre site. Stormwater management must be taken seriously at every stage—pre-construction, construction, and post-construction—in a project of this scale.
- ❖ Energy: After Georgia Power shuttered coal fired power plants on the Chattahoochee River, we witnessed a reduction in the amount of water used to generate electricity. How will new data center demands and the recently approved expansion of natural gas and oil generation at Plant Yates in Coweta County affect water supply?
- ❖ Community impact: Are data centers the best use of limited community and natural resources? Once a community elects to host a high energy and water demanding industry, that community is locking in scarce resources that are not cheap or easy to

² Dawn Lim and Josh Saul, "Blackstone's data-center ambitions school a city on AI power strains," [Bloomberg](#) (December 8, 2024); Dave Williams, "Cryptocurrency mining stirs concerns across rural Georgia," [Capitol Beat News Service](#) (May 31, 2024); Atlanta Regional Commission, [The Effects of Cryptocurrency Mining on the Atlanta Region](#) (July 20, 2022); and Southern Georgia Regional Commission, [Model Ordinance for Cryptocurrency and Data Mining](#).

expand, and communities could be limiting future economic development opportunities that could generate more jobs.

2. Why Are There Data Centers in Georgia?

Technology and data centers have been operating in Georgia for nearly 50 years. Existing infrastructure, economic incentives, regional environmental conditions, and low-cost electric and water utility rates are the primary factors that have contributed to explosive growth in data center development.

Georgia's Department of Economic Development and data center real estate marketing materials consistently portray the metropolitan Atlanta region as "less vulnerable to hurricanes, earthquakes and other natural disasters that cause business disruption and interrupt productivity."³

The costs for electric service are very low when compared to other regions that have also witnessed growth in the data center market.⁴ And electricity is reportedly reliable and uninterrupted in some locations. One downtown Atlanta data center served by Georgia Power is advertised as having "no power outage recorded since 2007."⁵ Additionally, municipal water supplies necessary for cooling purposes are inexpensive.

Beginning in the 1980s and the early days of the internet, email and other data passed through a few Georgia military and academic facilities.⁶

By the 1990s, metropolitan Atlanta emerged as a national telecommunication and fiberoptic cable hub. Today, "two of the country's largest fiber routes...intersect in metro Atlanta," giving the region a global reach.⁷ Commercial data centers began to occupy metropolitan Atlanta's downtown high-rise buildings and smaller single-story buildings in suburban office parks measuring less than 100,000 square feet. For reference, the grass field at Truist Park (home of the Atlanta Braves) covers about 100,000 square feet. These early data centers offered telecommunication, network, and colocation data storage services to multiple customers. Almost all were in the City of Atlanta and Fulton and Cobb counties.

In the early 2000s, data center size, scale and location shifted. Google was among the first of the major technology companies to build a massive, stand-alone hyperscale data center in Douglas County to serve their own business needs. After an expansion, the facility now occupies large warehouse-like buildings encapsulating 1.3 million square feet. Quickly becoming a nucleus of data center development, today, Douglas County hosts—or will host—more than a dozen data centers, and half are of equal or greater size than Google's operation. The Mall of Georgia in Buford blankets 1.7 million square feet.

³ Georgia Department of Economic Development, "Data Centers," <https://georgia.org/industries/technology/data-centers>

⁴ CBRE, "North American Data Center Trends H1 2024" (August 19, 2024), <https://www.cbre.com/insights/reports/north-america-data-center-trends-h1-2024>

⁵ [Data Center Map](#), "Digital Realty: 250 Williams St NW (ATL14)."

⁶ Timothy B. Lee, "40 maps that explain the internet," [Vox](#) (June 2, 2014).

⁷ For quote, see: Georgia Department of Economic Development, "Data Centers," <https://georgia.org/industries/technology/data-centers>

Since 2018, in addition to any local incentives, the state of Georgia has offered sales and use tax exemptions for “computers, emergency backup generators, air handling units, cooling towers, energy storage or energy efficiency technology.”⁸ Two years ago the Georgia General Assembly renewed the state incentives through 2031.

The largest colocation, hyperscale, enterprise, government and artificial intelligence data center campuses proposed or under construction include multiple buildings totaling 2 million to 7 million square feet. Global data companies—including Amazon, DC BLOX, Meta, Microsoft, QTS, T5, Switch, and speculators—are locating even further from the City of Atlanta in Bartow, Coweta, Fayette, Henry, Monroe, Newton, Rockdale and Richmond counties where land is more readily available and affordable.

One last data center class emerged around 2020: cryptocurrency facilities. There are at least 10 mining operations in Dalton (Whitfield County), Sandersville (Washington), West Point (Harris and Troup), and Adel (Cook). More have been proposed. Georgia hosts the second greatest number of crypto mines, trailing only behind Texas.⁹ A handful of communities have pushed back against cryptocurrency operations across Georgia, in Forsyth (Monroe County), Fayetteville (Fayette) and Tifton (Tift). And in North Georgia, the Fannin County Commission has banned crypto mines.¹⁰ The concerns encouraged the South Georgia Regional Commission to develop a model ordinance for local adoption to specifically address crypto and bitcoin mines.¹¹

3. The proposed project may result in an operational interbasin transfer (IBT) from the Chattahoochee River basin to the Flint River basin.

This proposed project *may include* an operational “interbasin transfer,” as defined by Georgia Rule 391-3-6-.07(2)(m): “‘Interbasin Transfer’ shall mean a withdrawal or diversion of water from one river basin, followed by use and/or return of some or all of that water to a second river basin. The river basin from which the withdrawal or diversion occurs is termed the ‘donor’ basin, and the river basin to which all or a portion of the water is diverted and returned is termed the ‘receiving’ basin.”

The applicant has determined that the Coweta County Water & Sewer Authority can provide 105,000 gallons per day, presumably at peak demand, which would amount to 38,325,000 gallons per year. The source of the raw water is the Chattahoochee River (i.e. “donor basin”) and the Flint River Basin *could* be the “receiving basin” for *some* portion of the 52,000 gallons of wastewater per day (or 18,980,000 gallons per year).

⁸ Georgia Department of Economic Development, “Georgia Tax Exemptions,” <https://georgia.org/competitive-advantages/incentives/tax-exemptions>

⁹ Block Green, “The State of Bitcoin Mining – Georgia,” [Medium](#) (July 14, 2023).

¹⁰ Dave Williams, “Cryptocurrency mining stirs concerns across rural Georgia,” [Capitol Beat News Service](#) (May 31, 2024)

¹¹ Atlanta Regional Commission, [The Effects of Cryptocurrency Mining on the Atlanta Region](#) (July 20, 2022); and Southern Georgia Regional Commission, [Model Ordinance for Cryptocurrency and Data Mining](#).

4. Data center water demand and consumptive use are largely unknown.

Without public disclosure of some water metrics and needs in this DRI, the general public would have no clear sense of how much water data centers demand and consume. And the metrics in this DRI are proposed; once the facility is operational, there are no requirements for reporting actual demand and consumption.

In this letter, water demand means how much potable municipal water the facility requires for daily operation. Water consumption means how much water is lost (e.g. via evaporation) in the cooling process and water that is not returned to a wastewater treatment plant and the Chattahoochee River or other original water source.

The metropolitan Atlanta region's water supplies have historically been threatened by drought (e.g., the 2007 drought of record and more recent "flash droughts") and infrastructure failures. In May 2024, the City of Atlanta's water system experienced a massive outage after two water mains failed, leaving most of the city's customers with reduced pressure and under a boil water advisory for nearly seven days.¹² And the City's wholesale customers in portions of southern Fulton County—in Fairburn, Palmetto, and Union City where some of the state's largest data centers like this one have been proposed—experience frequent service interruptions, pressure issues, and boil water advisories.¹³

If the Artificial Intelligence (AI) segment of the data center market grows as anticipated, then the water demand is not insignificant. One analysis determined that a single AI generated 100-word email could consume about 17 ounces of water. If 16 million people generated the same message once a week for one year, then those AI generated emails could consume "435,235,476 liters, equal to the water consumed by all Rhode Island households for 1.5 days."¹⁴

Data centers utilize water in a variety of cooling technologies, mixing air conditioned and outdoor ("free") air, and managing humidity levels. Some cooling systems are more water intensive, like evaporative cooling. Others—like closed-loop air-cooled chiller systems—are less water intensive. Liquid or immersion cooling are the least water intensive. However, there is a general tradeoff: the less water intensive a cooling system, the higher energy intensive the data center. The Atlanta Regional Commission currently advocates for "waterless" or closed-loop systems to minimize the impact of data center development on water resources.¹⁵

We do have some information regarding data centers' actual water demand and consumption. Google's *2024 Environmental Report* declares that their Douglas County facility demands as much as 418.8 million gallons per year, or about 1.2 million gallons per day, for cooling and

¹² "Atlanta scrambles to prevent water crisis from spreading," *Atlanta Journal Constitution* (June 2, 2024).

¹³ Department of Watershed Management, City of Atlanta, Boil Water Advisory News Releases, <https://www.atlantawatershed.org/category/boil-water-advisory/>.

¹⁴ Pranshu Verma and Shelly Tan, "A bottle of water per email: the hidden environmental costs of using AI chatbots," *Washington Post* (September 18, 2024).

¹⁵ Atlanta Regional Commission, "Data Center Trends in Metro Atlanta," (November 13, 2024). slide 19, <https://cdn.atlantaregional.org/wp-content/uploads/arc-board-datacenters-v7.pdf>

general operations. This facility—and currently the only of its kind in Georgia—sources nearly all its evaporative cooling system water from reclaimed wastewater. The facility’s evaporative cooling process results in a consumptive loss of 345.6 million gallons per year (or 964,849 gallons per day) from the Chattahoochee River basin.¹⁶

Another recently proposed facility in Coweta County—DRI #4361 (a.k.a. “Project Sail”)—will consume a significant volume of water. At peak operation and full buildout in 2036, the data center campus will demand 9 million gallons of water per day, or about one-third of the amount of Chattahoochee River water that Coweta County Water & Sewer Authority is authorized to use per day (27 million gallons per day, see surface water withdrawal permit number 038-1218-04, issued April 2, 2024). Of that, the proposed facility will consume 6 million gallons per day at full buildout—this consumed water will presumably be evaporated in the data center cooling process and not returned to the Chattahoochee River. The remaining 3 million gallons per day will be wastewater discharged into the Coweta County Water & Sewer Authority sanitary sewer system.¹⁷

Many other facilities in Douglas County are said to rely on closed-loop cooling systems that do not require significant amounts of water. For the past few years, the Douglasville-Douglas County Water & Sewer Authority has provided about 1 million gallons of water per day, or about seven percent of daily water demand, to fewer than a dozen data centers. That percentage will undoubtedly increase as proposed Microsoft, Amazon, and other data centers enter service. In a sign that the county may have reached a data center saturation point, Douglas County has indicated a reluctance to offer local incentives for new facilities.¹⁸

Some proposed data centers have provided anticipated water demands (see *Table 1*). In Georgia, large construction projects are considered Developments of Regional Impact (DRI) and are vetted by regional commissions. Some of the recent DRI submissions indicate that new data center water requirements can vary widely, even for facilities of comparable energy demand and size.

¹⁶ Google, *2024 Environmental Report*, <https://www.gstatic.com/gumdrop/sustainability/google-2024-environmental-report.pdf>, see pages 44 and 79.

¹⁷ [Development of Regional Impact \(DRI\) #4361](#) filing documents (Georgia Department of Community Affairs).

¹⁸ Drew Kann and Zachary Hansen, “Georgia Wanted to attract more data centers. Now it needs more power,” *Atlanta Journal Constitution* (January 26, 2024).

Table 1

Facility	Energy demand (megawatts)	Square feet	Daily water demand (thousand gallons)	Annual water demand (million gallons)
Rumble Tech Campus	1,120	4.2 million	2 million gallons/day	750 M gallons/yr
Microsoft Union City	324	2.1 million	50,000 gallons/day	18.3 M gallons/yr
T5 Litha Springs	300	1.6 million	42,000 gallons/day	15.3 M gallons/yr
Rocky Creek	250	1.3 million	4,000 gallons/day	1.5 M gallons/yr
QTS Fayetteville	250	7 million	570,000 gallons/day	208 M gallons/yr

5. The cumulative impact of data center water demand and consumptive use will increase in the future.

The cumulative impacts of data center water demand will only increase in the coming years and could result in significant consumptive loss in the Chattahoochee, Flint, and other river basins. Furthermore, data center operators consider their facilities “critical” and in the same class as hospitals. Data centers’ significant water demand and consumptive use, and additional critical facility capacity demand will place increased stress on water managers, regulators, stakeholders, and the resource itself in the Apalachicola-Chattahoochee-Flint (ACF) River Basin during flash and long-term droughts.

According to the applicant’s DRI, Project Peach will have a peak water demand of 105,000 gallons per day (0.105 MGD), or 38,325,000 gallons per year, and a peak discharge of 52,500 gallons a day (0.0525 MGD), or 19,162,500 gallons per year. This would result in a peak consumptive use and loss of 52,500 gallons per day (or 19,162,500 gallons per year; See *Table 2*).¹⁹ That is enough water to fill approximately one Olympic sized swimming pool with 660,000 gallons of water 29 times in one year.

Table 2

	Input	Output	Consumptive Use (Input minus Output)
Proposed facility	gallons/day peak demand	gallons/day peak discharge	gallons/day peak consumptive loss
Project Peach	105,000	52,500	52,500

In an application for a wastewater discharge permit, a similar data center campus proposed in Fulton County explained that the peak water demand and discharge would occur on days when

¹⁹ Development of Regional Impact (DRI) #3576, “Additional DRI Information Form” (May 4, 2022), <https://apps.dca.ga.gov/DRI/AppSummary.aspx?driid=3576>.

the ambient air temperature reaches and exceeds 85 degrees Fahrenheit.²⁰ Data from the National Weather Service (NWS) station at the Hartsfield-Jackson Atlanta International Airport from 2023, the second hottest year for Atlanta, provides some indication of how many days could reasonably exceed 85 degrees.²¹ In 2023, the NWS recorded 105 days over 85 degrees.²² The meteorological data suggests the proposed Fulton County data center campus water demand and consumptive use will spike at the same time water demand will spike in other sectors, and when surface water flow rates could be low. Similar operating conditions could be reasonably expected for Project Peach.

Given the relatively low water consumption at Project Peach, it is possible Project Peach's data center campus will use a less water intensive closed-loop cooling system. As noted above, some cooling systems are more water intensive, like evaporative cooling. Others—like closed-loop air-cooled chiller systems—are less water intensive. Liquid or immersion cooling are the least water intensive. However, there is a general tradeoff: the less water intensive a cooling system, the higher energy intensive the data center.

The Atlanta Regional Commission currently encourages “waterless” or closed-loop cooling systems (vs. evaporative cooling) to minimize the impact of data center development on water resources.²³ QTS's City of Atlanta campus reportedly maintains a rainwater collection system that diverts water for use “in the facility's evaporative cooling system to minimize its reliance on municipal water.”²⁴ Some data center developers in Douglas County are apparently contemplating an additional water source: reclaimed wastewater from Cobb County. Google's Douglas County data center is currently the only data center operating with reclaimed wastewater. Additional data centers using reclaimed wastewater and their consumptive use would undoubtedly result in less water being returned to the Chattahoochee River.

When drought and low flow conditions persist, the Georgia Environmental Protection Division (EPD) Director has the authority to declare a drought response level per the Rules for Drought Management (391-3-30). However, these measures typically target “public water systems” and their residential and commercial customers, and not industrial operations and critical facilities. If a drought were particularly severe, then the EPD Director could establish “numeric reduction requirements for permittees that are public water systems,” which could impact all the public water system's customers, including data centers.

The public does not know if data centers are prepared for any disruption in water service. Data centers consider themselves “critical facilities” operating 24 hours a day, 7 days a week, 365

²⁰ [Public Notice No. 2024-23ML, Microsoft Data Center \(CC006\), Draft Permit GA0050346.](#)

²¹ National Weather Service, *2023 Annual Climate Summary*, <https://www.weather.gov/ffc/2023AnnualClimateSummary>

²² Extreme Weather Watch, “Historical record Atlanta, Georgia weather for the year 2023 based on NOAA data,” <https://www.extremeweatherwatch.com/cities/atlanta/year-2023>.

²³ Atlanta Regional Commission, “Data Center Trends in Metro Atlanta,” (November 13, 2024). slide 19, <https://cdn.atlantaregional.org/wp-content/uploads/arc-board-datacenters-v7.pdf>

²⁴ QTS, *2023 Sustainability Report* (2024), Page 18, https://qtsdatacenters.com/wp-content/uploads/2024/10/QTS-Sustainability-Report_2023_FINAL.pdf

days a year. Data centers market their ability to remain on-line in the event of a loss of power. Redundant power supplies, backup generators, etc. ensure an uninterrupted power supply. But it is not clear if data centers have adequate backup water supplies, or are prepared for water main breaks, low pressure events, or other disruptions to water system distribution. Public water systems generally cannot guarantee 100 percent up-time and continuous operation.

Local water providers are indeed thinking about their data center customers. Some data center developers and public water suppliers recommend data centers operators install on-site backup water storage. And when service disruptions occur, local jurisdictions appear to treat data centers as critical facilities. For example, after the City of Atlanta's dual water distribution line ruptures in May 2024, Asher Morris, Deputy Director, City of Atlanta Office of Emergency Preparedness, told City Council Members that city crews worked to support "our critical data centers" to ensure chillers and cooling systems were fully operable.²⁵

6. Conclusion

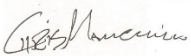
Chattahoochee Riverkeeper thanks the Three Rivers Regional Commission for the opportunity to submit these general comments regarding the proposed "Project Peach" data center campus development in Coweta County, known as DRI #4301.

Our organization works hard to make sure there is enough clean water in the Chattahoochee River for all the communities and stakeholders who depend on the river. The cumulative water quality and water supply impacts of data center water demand and consumptive use will increase in the future, potentially stressing river systems already operating at the edge.

Any decision the state of Georgia makes regarding municipal, industrial, and agricultural water use must be made within the framework of the 2021 United States Supreme Court's opinion in *Florida v. Georgia* (no. 142). The Justices emphasized Georgia's "obligation to make reasonable use of Basin waters in order to help conserve that increasingly scarce resource" that has been compromised by "climatic changes."²⁶ We agree with the Court.

If you have any questions, please contact me directly.

Sincerely,



Chris Manganiello, Ph.D.

Water Policy Director

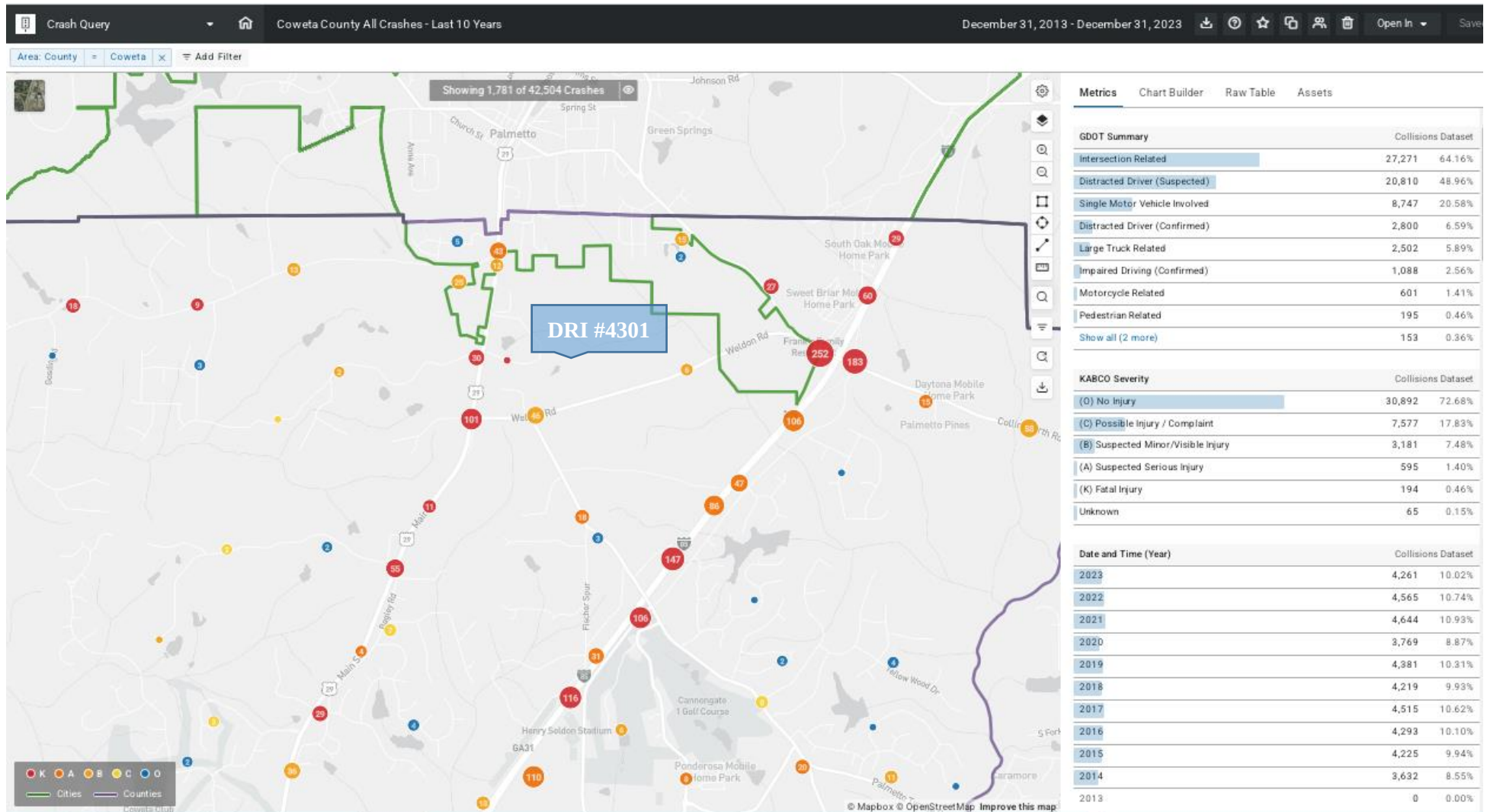
cmanganiello@chattahoochee.org

²⁵ City of Atlanta, Utility Committee Work Session, July 9, 2024, video: https://link.edgепilot.com/s/5809ecdb/J9oqdGaetEelkKWaOq1mOA?u=https://atlantacityga.igq2.com/Citizens/Detail_Meeting.aspx?ID=3921.

²⁶ *Florida v. Georgia* (no. 142), see pages 6 and 10.



TRRC Review Information
DRI #4301 – Project Peach – Coweta county
Map: All Crashes 2014-2023 Near Project Site
Source: Numetric



Coweta County All Crashes - Last 10 Years

Created on February 3, 2025

Created by Stephanie Wagner

Data extents: December 31, 2013 to December 31, 2023



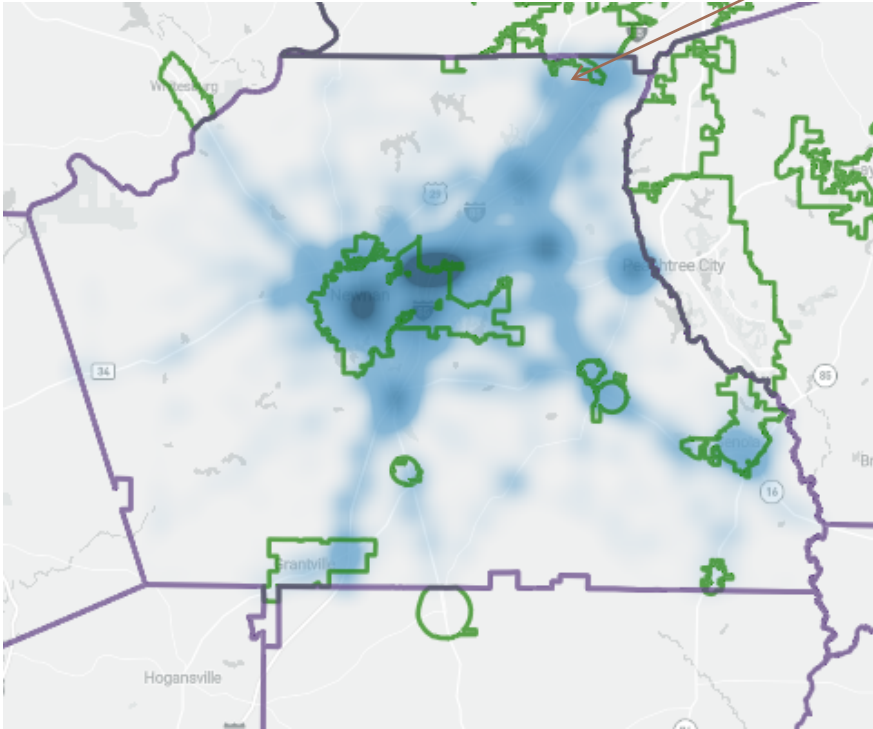
Applied Filters

Area: County

=

Coweta

Approximate DRI
#4301 Location



K

A

B

C

O

© Mapbox © OpenStreetMap

Total Crashes	42,504	Fatal Crashes	194
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GDOT Summary	Collisions Dataset	
Intersection Related	27,271	64.16%
Distracted Driver (Suspected)	20,810	48.96%
Single Motor Vehicle Involved	8,747	20.58%

Distracted Driver (Confirmed)	2,800	6.59%
Large Truck Related	2,502	5.89%
Impaired Driving (Confirmed)	1,088	2.56%
Motorcycle Related	601	1.41%
Pedestrian Related	195	0.46%
Impaired Driving (Suspected)	97	0.23%
Bicycle Related	56	0.13%

KABCO Severity	Collisions Dataset	
(O) No Injury	30,892	72.68%
(C) Possible Injury / Complaint	7,577	17.83%
(B) Suspected Minor/Visible Injury	3,181	7.48%
(A) Suspected Serious Injury	595	1.40%
(K) Fatal Injury	194	0.46%
Unknown	65	0.15%

Date and Time (Year)	Collisions Dataset	
2023	4,261	10.02%
2022	4,565	10.74%
2021	4,644	10.93%
2020	3,769	8.87%
2019	4,381	10.31%
2018	4,219	9.93%
2017	4,515	10.62%
2016	4,293	10.10%
2015	4,225	9.94%
2014	3,632	8.55%
2013	0	0.00%

Date and Time (Hour of Day)	Collisions Dataset	
12 am - 2 am	837	1.97%
2 am - 4 am	593	1.40%
4 am - 6 am	914	2.15%
6 am - 8 am	3,578	8.42%
8 am - 10 am	3,741	8.80%
10 am - 12 pm	3,996	9.40%
12 pm - 2 pm	5,326	12.53%
2 pm - 4 pm	6,411	15.08%

+ 4 more	17,108	40.26%
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Manner of Collision (Crash Level)	Collisions Dataset	
Rear End	17,937	42.20%
Angle Crash	10,118	23.80%
Not a Collision with Motor Vehicle	8,572	20.17%
Sideswipe-Same Direction	3,892	9.16%
Head On	874	2.06%
Sideswipe-Opposite Direction	714	1.68%
(None)	377	0.89%
Angle	20	0.05%

Location at Impact (Crash Level)	Collisions Dataset	
On Roadway - Non-Intersection	24,630	57.95%
On Roadway - Roadway Intersection	10,201	24.00%
Off Roadway	3,416	8.04%
On Shoulder	2,345	5.52%
Median	691	1.63%
Entrance/Exit Ramp	390	0.92%
(None)	326	0.77%
On Roadway - Driveway Intersection	222	0.52%
+ 9 more	283	0.65%

Most Harmful Event (Unit Vehicle)	Collisions Dataset	
Motor Vehicle in Motion	29,991	70.56%
Tree	1,370	3.22%
Parked Motor Vehicle	1,116	2.63%
Ditch	924	2.17%
Over Turn	836	1.97%
Median Barrier	748	1.76%
Animal	486	1.14%
Deer	468	1.10%
+ 30 more	3,557	8.36%

Operator/Pedestrian Contributing Factors (Unit Order)	Collisions Dataset	
Driver Lost Control	2,498	5.88%
Other	1,806	4.25%
Too Fast for Conditions	1,663	3.91%
Following Too Close	1,192	2.80%

Changed Lanes Improperly	1,058	2.49%
Under the Influence (U.I.)	699	1.64%
(None)	620	1.46%
Reaction to Object or Animal	598	1.41%
+ 34 more	3,791	8.94%

Area: County	Collisions Dataset	
Coweta	42,504	100.00%
+ 158 more	0	0%

Area: GDOT District (Crash Level)	Collisions Dataset	
D3	42,504	100.00%
+ 6 more	0	0%

SHSP Emphasis Area	Collisions Dataset	
Intersection Related	27,271	64.16%
Distracted Driver (Suspected)	20,810	48.96%
Young Adult Driver (Age 20-24)	8,811	20.73%
Older Driver Related (55-64)	8,504	20.01%
Young Driver (Age 15-19)	7,806	18.37%
Roadway Departure	7,594	17.87%
Older Driver Related (65+)	7,096	16.69%
Aggressive/Speed Related	3,284	7.73%
+ 10 more	12,147	28.58%

First Harmful Event	Collisions Dataset	
Motor Vehicle in Motion	33,255	78.24%
Other/Unknown	1,187	2.79%
Ditch	1,089	2.56%
Tree	976	2.30%
Parked Motor Vehicle	888	2.09%
Other Non-Collision	740	1.74%
Median Barrier	680	1.60%
Deer	617	1.45%
+ 32 more	4,457	10.49%

Vehicle Type (Crash Level)	Collisions Dataset	
Passenger Car	29,712	69.90%
Sports Utility Vehicle (SUV)	14,807	34.84%

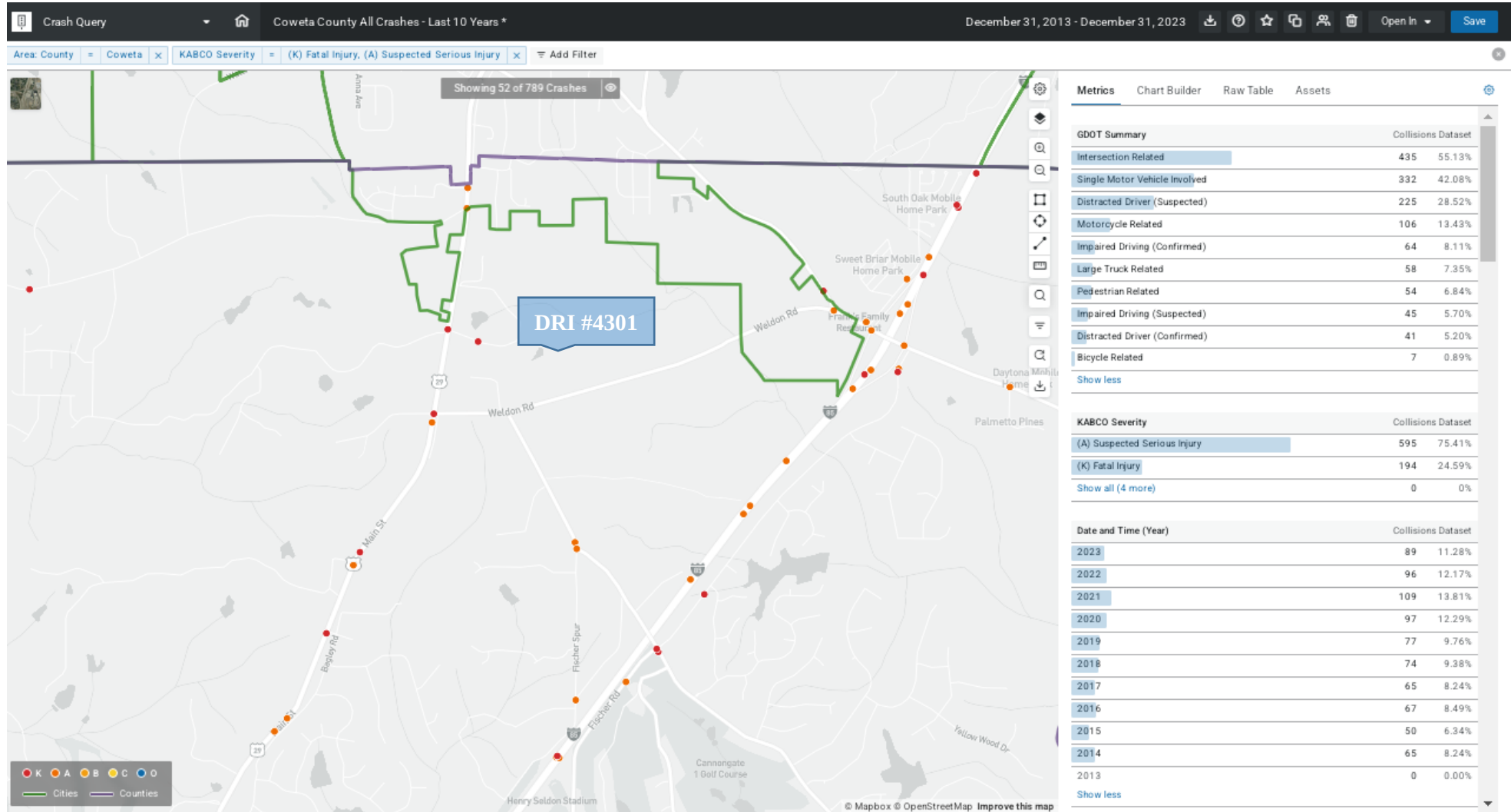
Pickup Truck	11,893	27.98%
Van	3,206	7.54%
Tractor/Trailer	1,443	3.39%
Single Unit Truck	676	1.59%
Motorcycle	583	1.37%
Bus	233	0.55%
+ 16 more	993	2.33%

Roadway Contributing Factors	Collisions Dataset	
No Contributing Factors	36,785	86.54%
Road Surface Condition (wet, icy, snow, slush, etc.)	4,106	9.66%
Obstruction in Roadway	324	0.76%
Water Standing	190	0.45%
Traffic Congestion	117	0.28%
Road Under Construction	56	0.13%
Running Water	37	0.09%
Loose Material on Surface	34	0.08%
+ 6 more	137	0.32%

Vehicle Contributing Factor (Crash Level)	Collisions Dataset	
No Known Defects	41,509	97.66%
Slick Tires	433	1.02%
Other	207	0.49%
Brake Failure	195	0.46%
Tire Failure	191	0.45%
Steering Failure	51	0.12%
Improper Lights	33	0.08%
Power Train	17	0.04%
+ 5 more	25	0.06%

Countermeasures All	Collisions Dataset	
Countermeasure: Intersection Crashes (vehicle)	10,811	25.44%
Countermeasure: Roadway and Lane Departure Crashes	4,726	11.12%
Countermeasure: Lighting Improvements (Intersection)	2,131	5.01%
Countermeasure: Lighting Improvements (Non-Intersection)	1,833	4.31%
Countermeasure: Clear Roadside	1,665	3.92%
Countermeasure: Wildlife Warning	1,137	2.68%
Countermeasure: Road Diet	835	1.96%

TRRC Review Information
DRI #4301 – Project Peach – Coweta county
Map: **Life Altering** Crashes 2014-2023 Near Project Site
Source: Numetric



CRASH SUMMARY REPORT

Coweta County Life-Altering Crashes - Last 10 Years

Created on February 3, 2025

Created by Stephanie Wagner

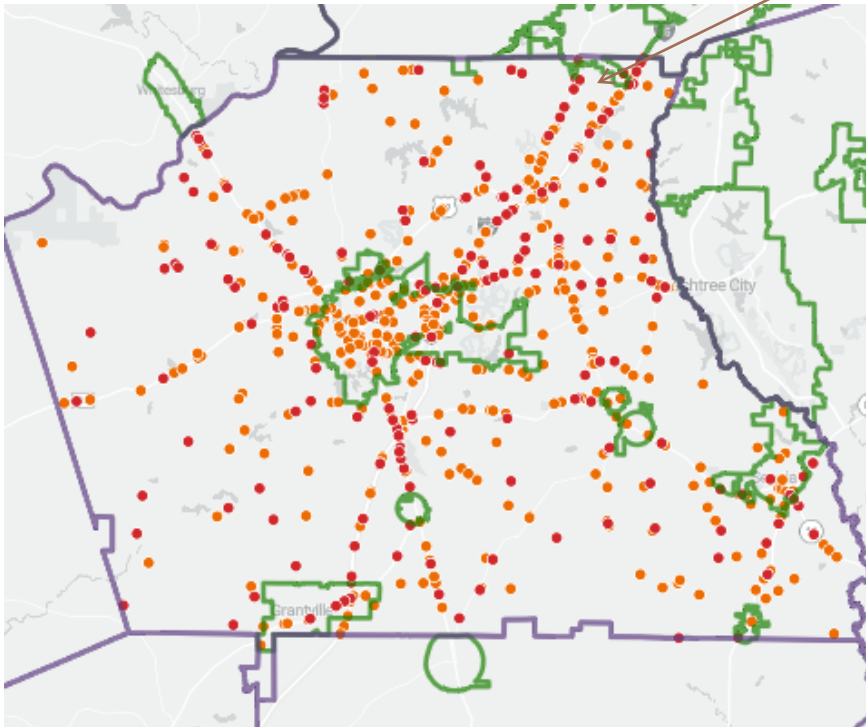
Data extents: December 31, 2013 to December 31, 2023



Applied Filters

Area: County = Coweta KABCO Severity = (K) Fatal Injury, (A) Suspected Serious Injury

Approximate DRI #4301 Location



● K ● A ● B ● C ● O

© Mapbox © OpenStreetMap

Total Crashes

789

Fatal Crashes

194

GDOT Summary

Collisions Dataset

Intersection Related

435

55.13%

Single Motor Vehicle Involved

332

42.08%

Distracted Driver (Suspected)	225	28.52%
Motorcycle Related	106	13.43%
Impaired Driving (Confirmed)	64	8.11%
Large Truck Related	58	7.35%
Pedestrian Related	54	6.84%
Impaired Driving (Suspected)	45	5.70%
Distracted Driver (Confirmed)	41	5.20%
Bicycle Related	7	0.89%

KABCO Severity	Collisions Dataset	
(A) Suspected Serious Injury	595	75.41%
(K) Fatal Injury	194	24.59%
+ 4 more	0	0%

Date and Time (Year)	Collisions Dataset	
2023	89	11.28%
2022	96	12.17%
2021	109	13.81%
2020	97	12.29%
2019	77	9.76%
2018	74	9.38%
2017	65	8.24%
2016	67	8.49%
2015	50	6.34%
2014	65	8.24%
2013	0	0.00%

Date and Time (Hour of Day)	Collisions Dataset	
12 am - 2 am	51	6.46%
2 am - 4 am	37	4.69%
4 am - 6 am	34	4.31%
6 am - 8 am	58	7.35%
8 am - 10 am	42	5.32%
10 am - 12 pm	57	7.22%
12 pm - 2 pm	58	7.35%
2 pm - 4 pm	91	11.53%
+ 4 more	361	45.75%

Manner of Collision (Crash Level)	Collisions Dataset	
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Not a Collision with Motor Vehicle	384	48.67%
Angle Crash	190	24.08%
Rear End	102	12.93%
Head On	92	11.66%
Sideswipe-Same Direction	15	1.90%
Sideswipe-Opposite Direction	6	0.76%
+ 2 more	0	0%

Location at Impact (Crash Level)	Collisions Dataset	
On Roadway - Non-Intersection	300	38.02%
Off Roadway	193	24.46%
On Roadway - Roadway Intersection	170	21.55%
On Shoulder	102	12.93%
Median	14	1.77%
On Roadway - Driveway Intersection	4	0.51%
On Roadway - Railroad Crossing	3	0.38%
Entrance/Exit Ramp	2	0.25%
+ 9 more	1	0.13%

Most Harmful Event (Unit Vehicle)	Collisions Dataset	
Motor Vehicle in Motion	355	44.99%
Tree	117	14.83%
Over Turn	93	11.79%
Pedestrian	38	4.82%
Ditch	25	3.17%
Other Non-Collision	16	2.03%
Parked Motor Vehicle	13	1.65%
Utility Pole	13	1.65%
+ 30 more	95	12.06%

Operator/Pedestrian Contributing Factors (Unit Order)	Collisions Dataset	
Driver Lost Control	165	20.91%
Too Fast for Conditions	88	11.15%
Other	53	6.72%
Under the Influence (U.I.)	47	5.96%
Changed Lanes Improperly	33	4.18%
Driver Condition	24	3.04%
Exceeding Speed Limit	20	2.53%

Failure to Yield	16	2.03%
+ 34 more	103	13.07%

Area: County	Collisions Dataset	
Coweta	789	100.00%
+ 158 more	0	0%

Area: GDOT District (Crash Level)	Collisions Dataset	
D3	789	100.00%
+ 6 more	0	0%

SHSP Emphasis Area	Collisions Dataset	
Intersection Related	435	55.13%
Roadway Departure	317	40.18%
Improper Occupant Protection	254	32.19%
Distracted Driver (Suspected)	225	28.52%
Aggressive/Speed Related	164	20.79%
Young Adult Driver (Age 20-24)	156	19.77%
Older Driver Related (55-64)	140	17.74%
Young Driver (Age 15-19)	127	16.10%
+ 10 more	516	65.39%

First Harmful Event	Collisions Dataset	
Motor Vehicle in Motion	442	56.02%
Tree	82	10.39%
Over Turn	55	6.97%
Other Non-Collision	52	6.59%
Pedestrian	50	6.34%
Ditch	37	4.69%
Mail Box	18	2.28%
Culvert	17	2.15%
+ 32 more	129	16.36%

Vehicle Type (Crash Level)	Collisions Dataset	
Passenger Car	434	55.01%
Pickup Truck	235	29.78%
Sports Utility Vehicle (SUV)	222	28.14%
Motorcycle	102	12.93%
Van	48	6.08%

Tractor/Trailer	34	4.31%
Single Unit Truck	22	2.79%
Pedalcycle, Bicycle	7	0.89%
+ 16 more	20	2.54%

Roadway Contributing Factors	Collisions Dataset	
No Contributing Factors	722	91.51%
Road Surface Condition (wet, icy, snow, slush, etc.)	50	6.34%
Road Under Construction	3	0.38%
Water Standing	3	0.38%
Obstruction in Roadway	2	0.25%
Backup Due to Prior Crash/Secondary Crash	1	0.13%
Loose Material on Surface	1	0.13%
Ruts, Holes, Bumps	1	0.13%
+ 6 more	2	0.26%

Vehicle Contributing Factor (Crash Level)	Collisions Dataset	
No Known Defects	779	98.73%
Slick Tires	13	1.65%
Other	8	1.01%
Brake Failure	3	0.38%
Improper Lights	2	0.25%
Power Train	2	0.25%
Tire Failure	1	0.13%
+ 6 more	0	0%

Countermeasures All	Collisions Dataset	
Countermeasure: Roadway and Lane Departure Crashes	156	19.77%
Countermeasure: Clear Roadside	118	14.96%
Countermeasure: Lighting Improvements (Intersection)	89	11.28%
Countermeasure: Lighting Improvements (Non-Intersection)	83	10.52%
Countermeasure: Intersection Crashes (vehicle)	80	10.14%
Countermeasure: Centerline Crash Related (Vehicle)	47	5.96%
Countermeasure: Road Diet	23	2.92%
Countermeasure: Pedestrian Control (Intersection)	20	2.53%
+ 3 more	28	3.55%