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www.ogeecheeriverkeeper.org
Working Together to Protect the Ogeechee, Canoochee and Coastal Rivers

November 5, 2026

Via E-Mail - planning@hogarc.org

Heart of Georgia Altamaha Regional Commission
Planning Department
℅ Coleman O'Quinn
Regional Planner

Re: Comments on DRI #4846 – Canoochee River RV Resort – Data Center Project development in Candler County, Georgia

Heart of Georgia Altamaha Regional Commission and Candler County:

Ogeechee Riverkeeper 501(c)(3) (ORK) works to protect, preserve, and improve the water quality of the Ogeechee River basin, which includes the Canoochee River, tributary streams, and all of the streams flowing out to Ossabaw Sound and St. Catherine's Sound. The Ogeechee River system drains more than 5,500 square miles across 20 counties in Georgia. ORK works with local communities to retain the ecological and cultural integrity of rivers, streams, wetlands, and related habitats throughout the Basin. One of ORK's primary roles is as watchdog on new land development projects in the watershed that could pose a threat to its water quality and aquatic environments.

ORK's comments on the Canoochee River RV Resort – Data Center Project development address the following four broad topics. First, the estimated water supply, with an unspecified source, for the site appears shockingly large, especially when compared to the expected wastewater treatment demand. Further, the plans for wastewater treatment are largely unconsidered and need significantly more attention. Second, the hydrology on and nearby the site make the location poorly suited for a project of this size requiring the significant amount of impervious surface planned. Third, the information in the DRI notice and other publicly available sources needs clarification and more information. The current status of public available information raises concerns about the readiness of the proposal and whether a DRI review or rezoning decision is appropriate at this time. Fourth, Candler County should further ensure that the entire process is transparent, allow for meaningful public comment during important decisions, and that a Community Impact Assessment or similar review is provided by the applicant/developer before any approving decisions are made. Until these concerns are addressed, Ogeechee Riverkeeper urges Candler County to delay any rezoning, approvals, permitting, or signing of agreements until it is satisfactorily reassured about the proposed development.

1. **Water supply and wastewater treatment**

Plans presented for both the water supply and the wastewater treatment for the proposed project are currently insufficient and need more information before any approval. The large discrepancy between the daily estimates for water supply and wastewater treatment demand, without explanation, is a significant concern. The source of the water supply is unspecified beyond stating an "on-site well" will be used. Groundwater monitoring and protections should accompany any project like this, including a detailed explanation of water conservation measures. Likewise, detailed plans for wastewater treatment are vital for this project.

Water supply is for this project a concern that Candler County should require much more detailed disclosures from the applicant/developers before any approval decision. Further, analysis of the water supply source and inclusion of conditions that protect the county's residents and resources should accompany any approvals, with revocation of any permits or certificates functioning as the enforcement mechanism.

The large discrepancy between daily water supply demand and wastewater disposal calls for more details and deeper consideration. As presented, 200,000 gallons per day are projected to be used. This is a significant amount of water that deserves careful consideration, planning, and protections. Those precautions appear lacking from the DRI information and other publicly available information.[1] Beyond simple statements of "on-site wells," little detailed information exists about water supply, justification of need, or its use.

It is unclear why 200,000 gallons per day of water supply are necessary for this site. According to the cooling system data sheet,[2] roughly 500,000 will be needed to initially fill the system. The data sheet then claims that refill will not be needed for another 5 years. Beyond that, the conceptual building design specifications information sheet[3] only notes domestic and fire suppression demand. Cross-referencing the estimated wastewater demand, daily water supply demand will not be much more than 5,000 gallons per day. After the roughly 2.5 days needed to initially fill the cooling system, the vast majority of the sought 200,000 gpd of supply will go unused. Even with conservative estimate of 10,000 gpd of needed daily supply, that would only be 5% of permitted daily use. Why does the project need such a large amount of water supply? Is there an alternative water supply arrangement that would require a smaller daily permit? Are there other municipal or private water supply options to address the long-term supply and/or initial fill? ORK calls on Candler County to seek justification from the developers of its proposed plan and to seek alternative options for water supply.

The water supply source is also not identified. The sole reference to an "on-site well" fails to identify what the water source is, beyond generally groundwater. The developers should clarify what that water source is, specifically which aquifer is planned to be utilized. This missing specificity hints at a lack of analysis of potential water supply sources and the impacts to the selected water source. Candler County should request information about the applicant's assessment of the feasibility of other water supply sources, including whether a municipal water supply source is available and feasible. Municipal supply will add another layer of oversight to ensure water supply to the site is achieved

[1] Candler County. Data Center Information Hub. *Available at*: https://candlerco-ga.gov/1236/Data-Center-Information-Hub.
[2] Solomon Data Systems. "Community Information - Closed Loop Cooling." *Available at*: https://candlerco-ga.gov/DocumentCenter/View/485/Closed-Loop-Cooling-Data-PDF
[3] Solomon Data Systems. "Conceptual Building Design: Georgia Data Center Campus- Typical Building: Rendering and Specifications." *Available at*: https://candlerco-ga.gov/DocumentCenter/View/465/Conceptual-Building-Design-Specifications-PDF

efficiently and does not harm other users or the water supply source. Further, an initial analysis of the proposed water source must occur before this project is approved. Can the water source support the proposed use? Will it have negative effects on other nearby users? Will there be sufficient water supply pressure from the source to provide for firefighting needs[4] on the project site and elsewhere? How will these concerns be addressed on an on-going basis? ORK strongly urges Candler County to require these analyses before any approvals and to craft conditions that sufficiently monitor and assess the conditions during construction and operation.

In addition, if a private on-site well is selected, Candler County should require the applicant/operator to monitor its groundwater usage and the impacts to the aquifer. Daily water usage and the utilized aquifer's groundwater levels should be reported, at minimum, on a monthly basis. If the initial assessments of the water supply aquifer raises concerns about impacts to users, Candler County should consider implementing a larger-scale groundwater monitoring and mitigation program. As an example, Bryan and Bulloch counties implemented the Groundwater Sustainability Program[5] that requires monitoring, assesses potential impacts to other users related to the well operations, and creates a developer/operator funding mechanism that compensates impacted users for any needed well deepenings to maintain supply. Either monthly usage and groundwater level monitoring or the more robust groundwater monitoring and mitigation program can be mandated through a condition put on this site's rezoning decision. ORK urges Candler County to carefully consider how it will protect its residents and its groundwater resources.

Wastewater treatment plans for this type of new and evolving industrial facility is absolutely crucial to protect Candler County and its residents. The only discussion of wastewater, however, is limited to domestic sources. This is wholly insufficient and requires significantly more discussion, detail, and planning. Until these sufficiently protective plans are presented and explained, ORK strongly urges Candler County to either withhold any further consideration of the proposal as insufficiently complete or to deny any requested approvals, permitting, or certifications.

Industrial wastewater from the cooling system must be addressed. Industrial wastewater disposal is an unavoidable reality of this project. The extremely brief discussion of wastewater disposal in the DRI notice only addresses domestic wastewater disposal. Overlooking the most pollutant-heavy source of wastewater cannot occur before final County approvals on rezoning, permitting, and certifications.

Industrial wastewater disposal plans should be specifically detailed before any County approvals. While the cooling system data sheet[6] provides some discussion by the developers, it is not binding or sufficient. The developers' plan to have "a licensed heat-transfer-fluid contractor pump[ ] it out and truck[ ] it to a recycling facility" should, first, be considered by the County to determine whether that is safe and an acceptable level of risk it is willing to take and, second, be enshrined in detailed procedures to ensure the waste is handled appropriately in a rezoning or permitting condition or other binding agreement. The disposal plan should ensure it specifies and records the licensed contractors, maintains records of trucking logs, identifies where the industrial wastewater is being taken to, and that disposal

[4] WMAX. 'God, that ain't good' | Fire at Soperton bitcoin mining facility sends two workers to Augusta burn center. October 22, 2026. *Available at*: https://www.13wmaz.com/article/news/local/fire-at-soperton-bitcoin-mining-facility-sends-two-workers-to-augusta-burn-center/93-5cb3ed7c-f033-442a-a43a-710f5d251ed1

[5] Information available at: https://www.bryanbullochgsp.org/

[6] *See* Note 2.

complies with all applicable federal, state, and local laws - both in Candler County and in the jurisdiction of the disposal site - at the time of disposal.

In addition to detailed disposal plans, the County should require the developers and future operators to provide an effluent characterization study of any industrial waste it is disposing of. The effluent characterization study should be untaken by an independent third party selected by Candler County, paid for by the developer and/or operators, provide a full list of all chemicals used in the cooling fluid, and screen for other emerging contaminants such as various PFAS varieties and other chemicals of concern. This effluent characterization study will better-equip the County with knowledge of the pollutants at the site in the case of future spills or other incidents. Being able to identify potential sources of fugitive pollutants will help the County and future operators to quickly identify the source and responsible parties, reduce response times, and better protect the public health.

Another concern about the developers' disposal plan is its "plain-water flushing" of the cooling system. It states that those flushing events will only occur "with written approval from the local wastewater utility." However, the project is not proposing to connect into the Candler County, City of Metter, or other local wastewater utility system. This leaves the question of where that industrial pollutant-laden wastewater will be disposed of. ORK urges Candler County to require the developers to explain its plans with this wastewater's disposal. Candler County should ensure this industrial wastewater is pretreated and can be safely discharged to either a municipal treatment works or directly to a water of the state in compliance with applicable state and federal laws. This can be achieved through a condition on the rezoning and in a future Planned Unit Development (PUD) agreement.

The septic system proposed likewise needs additional consideration. First, no industrial waste can be permitted to be disposed of through an on-site septic system. It is very likely that the industrial wastewater coming from the cooling system cannot be sufficiently processed before it enters the environment. Candler County should ensure, through condition or other binding agreement, that no industrial wastewater will be discharged to the on-site septic system proposed and that a septic system will only be utilized for domestic wastewater.

Second, the septic system's location will also need to be carefully selected. As will be discussed below, the property is heavily influenced by water - wetlands, floodplains, and other flowing waters. Septic systems cannot operate effectively in these wet conditions, potentially leading to failing systems, fugitive septic waste, and downstream health impacts. Nowhere in the document provided, including the conceptual layout,[7] is the location of the septic system contemplated or proposed. Much of the non-wetland, non-Zone A flood zone is already proposed to be occupied by the project, leaving minimal suitable space for the septic system and its drainfield. If no suitable space exists for a septic system, an alternative layout must be proposed. If no alternative layout is possible, different plans must be proposed to address the domestic wastewater expected at the site. If no plans are feasible, Candler County should not approve this project as incapable of addressing the domestic wastewater demand it will create.

Before approving the project, Candler County should be able to answer:

[7] Thomas & Hutton. Conceptual Layout - Project Metter. *Available at*: https://candlerco-ga.gov/DocumentCenter/View/466/Conceptual-Site-Plan-PDF

- Is 200,000 gallons per day of water supply needed for the operational lifetime of this project? Can a smaller daily usage amount achieve the same needs?
- What is the source of the water supply for the site? What aquifer is intended to be used?
- Can the proposed water source support this use? Has any assessment been undertaken? How will Candler County ensure the water source's ongoing health?
- Will this project's use of the water source impact other users? How did Candler County reach its conclusion on this question? How will the county evaluate potential future impacts?
- Are there alternative water supplies that could be used? Is municipal supply an option?
- What are the project's plans to dispose of industrial wastewater? Where will it be disposed of?
- What pollutants are present in the wastewater?
- Where will the "plain-water flushing" wastewater be disposed of?
- What kinds of wastewaters will the proposed septic system be used for? How does the county ensure this?
- Is the site suitable for a septic system?
- Is there a municipal wastewater option for domestic wastewater created by the site?
- Is there sufficient water supply and pressure to provide for fire suppression?

1. **Site hydrology - floodplains, wetlands, and stormwater management**

Stormwater management is important for any development in the region. As storms are expected to intensify and occur more frequently in the coming years and decades, stormwater management will only become more important. As such, a site's existing natural conditions must instruct whether a development is feasible and guide how stormwater will be managed, including the preservation of natural stormwater management, reductions to artificial and constructed stormwater intensifiers, building in long-term resilience to stormwater management facilities, and avoiding construction in hazardous areas. ORK urges Candler County to seriously consider these risks and only approve the project if it is confident these risks are sufficiently avoided or mitigated and that there will be no additional risk to nearby and downstream properties and residents.

If the project is to proceed, ORK urges Candler County to fully consider present conditions as well as future risks and require a significant redesign and reduction of the build-out to avoid current flooding risk and reduce additional flood risk from the construction. In addition, preserving already-existing natural flood controls and requiring additional stormwater control capacity should be considered and added as a condition.

Flooding and the related risk are very high at this proposed site. Flooding, and its associated damages and pollution risks, will be an ongoing and growing issue on this site. The presence of the Canoochee River and its tributary Sam's Creek further elevates these flooding risks. Candler County should first determine whether these risks, even after mitigation, avoidance, and careful site design and layout will be able to sufficiently protect the neighboring and nearby properties as well as the natural areas around this site.

Flooding is very likely at this location. FEMA's designated 1% Annual Chance Flood Hazard area, also known as the 100-year floodplain or Zone A,[8] should draw specific attention. While the "100-year floodplain" name implies that floods will only occur once every 100 years, this obscures the actual risk. Over a 30-year period, the actual flood risk is 26%[9] - a more than 1 in 4 chance for properties in the 100-year floodplain over that time.

The "100-year floodplain" only looks narrowly at the "base flood." The base flood describes the strength of flood that is 1% likely to happen in any year.[10] Non-base floods, *i.e.* floods less strong or severe than the base flood (aka the "100-year flood"), are more likely to happen each year. Likewise, the 100-year flood is not the absolute strongest possible flood that the properties could face. The narrow focus on the 100-year flood not only undercounts the potential frequency of flooding on the properties but also underconsiders the severity of flooding the properties could experience.

Further, reliance on the backwards-looking 100-year flood model further obscures risk. The estimate of floods and the extent of the floodplains rely on historic data, leaving out the most recent and most representative data. With the anticipated increase in storm frequency and intensity in the coming years and decades, the extent, size, and frequency of flooding on these properties is likely greater than the Flood Hazard area anticipates. This is highlighted by the age of FEMA's map[11] for the proposed site. FEMA's map was last updated in December 2010 - almost 16 years ago. In the intervening decade and a half, storms have intensified and become more frequent. The data relied on to delineate the current flood zones are old and likely no longer represent the conditions in Candler County today. Short of seeking an updated FEMA delineation of the area, ORK urges Candler County to create 500ft buffers from the edges of the current flood zones to accommodate not only the changes since the last map updates but also to build in resilience for future expansions of the flood zones over the operational lifetime of the site.

Riverine flooding also presents more serious flood risks. Rather than solely rain-based flooding, riverine flooding has much higher volumes of water and can persist much longer - continuing until river levels return to non-flood stages. Rather than infiltrating the ground, rivers collect much more water and take a longer time to disperse that collected water. As a result of these increased volumes and times, traditional stormwater management features like the proposed detention/retention ponds cannot function as intended when fully inundated by riverine flooding. As such, Candler County should question whether the proposed management features can actually prevent the increased flood risk that this site will create, especially during riverine flooding events.

The proposed layout presents serious concerns about flood risk and damage. The FEMA Special Flood Hazard Area that dominates the site will make it difficult to safely build the project as proposed. As noted above, the floodplains are likely larger than the FEMA maps suggest and are even more likely to expand over the project's operational lifetime. The proposed layout does not appear to take into account expanding flood risks, with buildings and infrastructure proposed to be constructed very close to the existing limits. Candler County should request

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[8] Federal Emergency Management Agency (FEMA). " Zone A." *See*: https://www.fema.gov/about/glossary/z?%2Fabout%2Fglossary%2Fz= .

[9] *See* https://savannahga.gov/FAQ.aspx?QID=332 and https://www.floodsmart.gov/flood-zones-and-maps

[10] Federal Emergency Management Agency. "Appendix B: How to Read a Flood Insurance Rate Map (FIRM) Course Glossary". *Available at*: https://emilms.fema.gov/is_0273/groups/157.html

[11] Federal Emergency Management Agency. Map Number 13043C0205A. *See*: https://msc.fema.gov/portal/search?AddressQuery=candler%20county%20airport (search term = "Candler County Airport."

alternative acceptable site layout plans from the developer that take into account these flooding concerns before making any approval decisions. The site should not be rezoned without reviewing a variety of layouts that fully consider the flood risks present on the site.

Finally, potential financial burdens related to flooding should be considered by Candler County before approving this project. Those financial burdens include, but are not necessarily limited to property and structure damage, water and land pollution, and buyout costs. At the most basic level, flooding threatens to inundate, damage, and destroy any structure in its path. Construction within the floodplain - including buildings, infrastructure, and roads - see their risks increase. Costs coming from flood debris clean up and collateral damage to neighboring properties and natural resources should be considered, as well as increased emergency response costs. Flooding also presents water pollution threats. Flood waters will sweep up not only trash and debris but also any other chemicals and pollutants on the site. While the nearby Canoochee River and Sam's Creek are the principal water bodies threatened by these pollution risks, downstream waters, properties, and natural areas will also be exposed to these polluted flood waters. Finally, if flooding occurs frequently enough, FEMA may offer a property buyout[12] to return the properties to their now-current conditions. These buyouts, though funded mainly by FEMA, still often expect a 25% contribution from the local and/or state government.[13] This burden, as well as additional clean-up, emergency, rescue, and other foreseeable flood-related costs would likely fall on the counties. ORK urges Candler County to specifically consider and factor in these foreseeable flood-related financial costs for this project.

Wetlands - natural and no-cost stormwater management - should be preserved throughout the properties. These quickly-dwindling resources not only reduce stormwater flows, they also retain important volumes of stormwater, filter pollutants, and provide natural habitats for the region's fish and wildlife. All of these ecosystem services are invaluable and are freely available - so long as local governmental bodies and regulators do not allow developers to fill the wetlands and build atop them. When wetlands are filled, these services are lost and either have to be replaced with expensive and less effective artificial options or are not replaced and harm nearby properties, our shared places, and the county's natural resources. Wetlands provide these ecosystem services regardless of the Army Corps' jurisdictional determination. As such wetlands preservation should be the first step in stormwater management.

Impervious surface coverage should also be reduced wherever possible as the next step in reducing stormwater management pressure. Based on the applicant's estimate of 16.3% impervious surface coverage of the approximately 470-acre site, this proposal will create approximately 76.61 acres of new impervious surface. These hard surfaces, like concrete and asphalt, prevent stormwater from infiltrating into the ground, where they can be absorbed and reduce stormwater volumes. Impervious surfaces also speed up stormwaters, adding to management pressure. Finally, impervious surfaces hold pollutants and allow them to be washed into nearby waterways if not properly captured or treated. To reduce these issues, a significant reduction in impervious surfaces should be prioritized.

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[12] University of Delaware Disaster Research Center and The Nature Conservancy. "Floodplain Buyouts: Challenges, Practices, and Lessons Learned." At page 9. August 2021. *Available at*: https://www.nature.org/content/dam/tnc/nature/en/documents/Buyouts_Lessons_Learned_Siders_Gerber_Chavez_TNC_Full_Report_2021.pdf

[13] Federal Emergency Management Agency. "FACT SHEET: Acquisition of Property After a Flood Event." *Available at*: https://www.fema.gov/press-release/20250121/fact-sheet-acquisition-property-after-flood-event

Further, Candler County should seek specification and clarification from the applicant on the question of wetlands impact by requiring the applicants to submit a separate wetlands plan. ORK asks Candler County to require the applicant to create a wetlands plan that, at minimum, (1) clearly delineates all of the wetlands present on the property and enumerates the acreage proposed to be filled and preserved, (2) specifies whether federally protected wetlands will be filled and commits to obtaining a Clean Water Act Section 404 permit before any land clear or construction activity, (3) prioritizes and details how the development preserves the wetlands present on the site, (4) adjusts the site layout to avoid wetland fill wherever possible, and (5) mitigates any lost wetlands with on-site mitigation or restoration efforts as close to the site as possible to reduce localized impacts.

Stormwater management facilities, like the proposed detention/retention ponds for this project, should be required to build-in additional resiliency to accommodate increasing storm intensity and frequency. Candler County should be specific in its requirements, rather than relying on non-specific, passing references of potential management options. To better prepare for intensifying and more frequent storming and flooding, stormwater and flood damage prevention designs should go beyond the required minimums, especially due the flood prone state of this site. First, the development should be conditioned on reducing post-construction runoff, rather than just ensuring no additional runoff compared to pre-construction amounts. This will help to offset stormwater pressure from stronger storms. Second, stormwater retention/detention ponds capacity should be increased. As one of the main mechanisms to control post-construction runoff, these ponds capacities are important. In anticipation of increasing storm strength, Candler County should require these ponds to be able to retain and assimilate 125% of the designated 100-year storm or 100% of the designated 500-year storm. Third, specific riverine flooding-related protections should be implemented. Ignoring the unique risks that come with riverine flooding is likely to result in increased flood risk over the project's operational lifetime. If the applicant/developer raises cost issues related to addressing these stormwater concerns, this site may not be appropriate for this development. Candler County should not prioritize this project over the cost of increased flooding risk to current and future Candler County residents.

Before approving this project, Candler County should be able to answer:

- Is the County comfortable with the flood risks currently present on the site? Is it comfortable with the additional flooding risks it will create?
- How will the County and the developers ensure that future flood zone expansion and its associated risks will not negatively affect the project, nearby residents, neighboring properties, and natural areas?
- Would creating floodplain buffers successfully account for future flood zone expansions? Are there more practicable alternatives?
- What considerations and mitigation efforts have been proposed to address the unique flooding issues created by riverine flooding?
- Could alternative site layouts better prevent flood risks onsite and downstream?
- Is Candler County comfortable with the potential financial risk related to FEMA property buyouts for this site?
- How many acres of wetlands will be filled by the project?
- Are there alternative layouts that could avoid or minimize the currently proposed wetlands filling?
- Are the wetlands proposed to be filled federally protected?
- Can impervious surface coverage be reduced?

- Would a wetlands plan better equip the County to make siting decisions?
- Are the proposed stormwater management facilities sufficient to prevent an increase in flooding over the entire operational lifetime of the project?
- Can additional stormwater management conditions be added, above current minimums, to help reduce flood risks for future generations of residents?
- Is there sufficient containment for fuel spills and clean up from fire-fighting or other emergency response to prevent illegal release to waters of the US in violation of the US Clean Water Act?
- Is Candler County able to monitor construction for Erosion and Sediment control to ensure unpermitted fill material is not released to waters of the US in violation of the US Clean Water Act?

2. Clarification and more information needed in planning documents

The information currently available needs clarification and expansion before Candler County makes any rezoning or permitting decisions.

The financial estimates provided in the DRI information raise questions. In the DRI Information Form Part 2,[14] it estimates that there will be $7,500,000,000 ($7.5 billion)in annual local tax revenues from this project. This estimate seems extremely large. For comparison, the significantly larger OpenAI data center proposed in Effingham will pay only $63 million under its payment in-lieu of taxes (PILOT) agreement upon full build-out.[15] Clearly, something is wrong here. ORK asks Candler County and the developers to clarify this confusion and to clearly communicate to the public the realistic economic benefit from this project. ORK also encourages Candler County to enshrine these promised economic benefits into a legally enforceable agreement to ensure that the benefits actually reach the county and its residents.

The solid waste estimates also need some clarification. As presented in the DRI Information Form Part 2, there is an estimated 0.0 tons of annual waste generated. This is impossible with the estimated 200 full-time employees present on the site. ORK urges Candler County to seek clarification on the actual amount of solid waste that will be generated. Further, Candler County should require the developers to provide an e-waste disposal plan. The CPU and GPU processors used in data centers have around a 6-year lifespan, with replacement often happening more frequently.[16] According to recent reporting onsite generators and power production and storage may also add to solid waste. "Rapid swings in AI data centers' power demands are straining vital equipment, causing batteries, generators and cooling systems to malfunction or wear out far sooner than expected."[17] This will create an enormous, continuous, and difficult to dispose of waste stream over the entire operational lifetime of the data center. To ensure that the county

[14] Georgia Department of Community Affairs. DRI #4846. DRI Information Form Part 2. *Available at*: https://apps.dca.ga.gov/DRI/AdditionalForm.aspx?driid=4846
[15] Effingham County. Project Camellia (OpenAI Data Center). "Camellia Infographic - PILOT Revenue." *Available at*: https://www.effinghamcounty.org/902/Project-Camellia-OpenAI-Data-Center
[16] Data Center Knowledge. "GPU Lifespan in Data Centers: Physical vs. Economic ." *See*: https://www.datacenterknowledge.com/data-center-chips/gpu-lifespan-in-data-centers-physical-vs-economic
[17]Malik, N.S. 2026. "AI's Volatile Power Demand is Damaging Its Own Data Centers." https://www.bloomberg.com/news/articles/2026-08-06/data-centers-are-being-damaged-by-ai-s-volatile-power-demand?leadSource=uverify%20wall

will not be stuck with the cost of safely disposing of these processors, Candler County should require a detailed and enforceable plan for the applicant/developer/operator to take full responsibility for this e-waste stream.

Engineering studies are largely missing from the publicly available information. Whether addressing the physical and hydrological siting of the facility, the roads and support electric infrastructure, the cooling system, back-up generation, or building specifications, the available information is either wholly missing or offers only a surface-level explanation. To allow for meaningful and constructive public comment, Candler County should require the submission of detailed engineering studies and publish them to the county's Data Center Information Hub.

Back-up power generation calls for much more significant planning and consideration. The developers provide some information, but are not even certain of whether it will utilize fuel-based generators or battery-powered back-up. Back-up power should be specified before any rezoning decision is made. The potential air quality and noise pollution impacts from back-up generation are significant and the public should be allowed to comment on specific plans rather than having to guess at what the developer will use. ORK urges Candler County to require the developer to provide a detailed back-up power plan. Further, ORK encourages Candler County to prioritize the impacts to Candler County residents from the available back-up power option when weighing and considering what option to allow.

Emergency response needs are missing and call for detailed plans. Data centers bring unique emergency response issues. Candler County should not bear the costs of responding to these unique issues. Candler County should determine to what degree emergency response resources must be expanded to respond to potential issues, what kinds of equipment, infrastructure, and personnel needs it will demand, and what kind of additional training will be required. These expanded needs should be funded by the developer.

In sum:

- The developer should provide the true estimate of annual local tax revenue it will create - $7.5 billion cannot be the correct number.
    - Candler County should also enshrine these estimates in legally enforceable agreements.
- The developer should provide the true estimate of solid waste demand that will be created by the project.
    - Candler County should also require an e-waste disposal plan to address processor disposal.
- Missing or under-detailed engineering studies should be fully completed and submitted by the developer to Candler County and be made publicly available.
- Detailed back-up power plans should be submitted and ensure that Candler County residents are not negatively impacted.
- Additional emergency response costs should be borne by the developer.

3. Additional suggestions in project review - public process, Community Impact Assessment,

Beyond the project-specific suggestions detailed above, Ogeechee Riverkeeper also offers the following general suggestions for this data center project proposal and for other large development projects. ORK urges

maximum transparency and public participation inclusion to not only gather public feedback on the project to inform the decision-makers' process but to also improve the requirements, conditions, and agreements if a project is approved. ORK also urges Candler County to implement a 'Community Impact Assessment' of projects to fully understand how the proposals will impact communities and resources, and to create a record of pre-development site conditions to rely on for future decommissioning.

Transparency and public participation are vital to reach the best decision, have community buy-in, and reflect county needs. Candler County has taken positive steps to this point by developing the Data Center Information Hub and hosting public information meetings. ORK encourages the county to continue these efforts with this and other large developments in the future.

In addition, ORK urges the Candler County Board of Commissioners to allow for meaningful public comment at each decision point and to ensure feedback from other local governmental bodies inform the Commission's decisions. Beyond the rezoning decision, an opportunity for public comment should be provided before a Planned Unit Development (PUD) agreement is finalized, with the text of the agreement available for the public to review well in advance of any vote. Similar opportunities should be afforded to the public for other decisions, such as site plan review, certificate of occupancy, business license issuance, water and sewer agreements, and other permitting, certifications, permissions, and approvals. Likewise, opportunities for Candler County planning and zoning staff and commissioners to offer reports and suggestions would be helpful. Finally, the feedback of the City of Metter, its elected officials, and its planning and zoning staff and committee should be sought, especially when a proposed development is close to city limits and/or plans to use City resources or infrastructure.

A **community impact assessment** should also be considered for this project and other large and significant developments. Hancock County's Special Use Permit Ordinance, for example, includes requirements for a Community Impact Assessment,[18] which considers pre-construction conditions, proposed activities, and provides the Board of Commissioners with information to better inform their decisions. This Assessment is undertaken and provided by the developer and considers topics including environmental impact, vulnerable populations, quality of life protections, and alternatives, among other topics. This document lays out impacts to the community and the county that are not always presented together and provides a clear picture of the project. It also provides a roadmap for future decommissioning to ensure the site is returned to the original conditions, or conditions suitable for redevelopment as deemed appropriate and desirable by the County at that time. ORK encourages Candler County to require the developers to provide a similar community impact assessment for this project.

In sum:

- Prioritize transparency and public participation.
- Allow for public comment on all aspects of the project, including but not limited to the PUD agreement, site plan review, certificate of occupancy, business license issuance, water and sewer agreements.
- Allow for Candler County and City of Metter governmental bodies and staff to provide feedback.
- Require the developers to submit a community impact assessment.

[18] *See* Attachment A below.

Thank you in advance for your time and consideration; please let me know if you have any questions or would like to talk further on these topics: ben@ogeecheeriverkeeper.org.

Ben Kirsch, Legal Director
Ogeechee Riverkeeper

Attachment A

Community Impact Assessment
from
Hancock County's Special Use Permit ordinance

Community Impact Assessment

The Board of Commissioners and the Planning Commission find that the information required in the Community Impact Assessment is relevant in balancing the interest in promoting the public health, safety, and general welfare against the right to unrestricted use of property and shall govern the exercise of the power to adopt or deny a Special Use Permit. Each Community Impact Assessment shall include the following information:

1. Permits List all permits and approvals needed for the proposed use(s) from the United States Environmental Protection Agency, the United States Army Corps of Engineers, and/or the Georgia Environmental Protection Division and provide copies of any such permits already obtained.

2. Pre-existing Environmental Conditions Description To the extent such information is publicly available, identify pre-existing environmental conditions within a two-mile radius of the proposed use(s) site, including the name and location of properties in that area with air pollution emission permits or wastewater discharge permits from the federal or state government, the name and location of known contaminated sites (e.g., listed as a federal Superfund site or on the State's Hazardous Site Inventory), the name and location of properties storing or using toxic chemicals, and any other known sources of pollution. Information on these sites may be obtained from federal or state databases such as those created or maintained by the United States Environmental Protection Agency or the Georgia Environmental Protection Division.

3. Environmental Impact Description The applicant shall provide the following information on the environmental impacts of the proposed use(s), regardless of whether a permit is required, to the extent such information is available or can be readily obtained:

A. Air Pollution: List tons per year of all Criteria Pollutants and Hazardous Air Pollutants. Include maximum permitted tons per year and anticipated actual tons per year.

B. Water Pollution: Identify all pollutants that may be directly or indirectly discharged into a water of the State from the construction and operation of the proposed use(s) on the property.

C. Waterbodies: Identify all lakes, perennial streams, wetlands, and flood zones located within a five-mile radius of the proposed use(s), including on the property itself, and provide a map or maps showing the location of these waterbodies and flood zones.

D. Stormwater Retention & Discharge: Provide a brief narrative summary of on-site stormwater capture, including total volume to be controlled, and sewer and stormwater discharge, including total volume to be discharged and any onsite treatment technology.

E. Water Use: Provide an estimate of the volume of water to be used annually for operations.

F. Energy Use: Provide an estimate of kilowatt hours of energy to be used annually for operations.

G. Hazardous or Toxic Materials: List any substance used or stored on-site that must be registered with either the state or a local emergency responder office pursuant to state or federal law such as the Toxics Release Inventory, and provide the name and estimated quantity of any such substance.

H. Transportation Trips: Provide an estimate of the number of truck, train, or other transportation trips per day anticipated during normal operations. Indicate if trucks, trains, or other transportation vehicles will be owned or contracted.

I. Fuel Use: List the type of fuel to be used for heating, cooling, and operations (e.g. heating oil, natural gas, solar, etc.).

J. Nuisance Issues: Provide a brief description of both projected impact of and plans to avoid, minimize, and control dust, noise, light, odors, and vibrations.

4. Vulnerable Populations Identify the location of vulnerable populations within a five-mile radius of the proposed use(s), including but not limited to schools, daycares, affordable housing developments, and senior centers.

5. Socioeconomic and Demographic Data Provide publicly available data on socioeconomic conditions of residents living within five miles of the proposed use(s), including race, income, poverty, unemployment, and age, including information on the number and location of residents over 64 and under five years old. This information may be obtained from sources such as the U.S. Environmental Protection Agency's EJSCREEN Tool or U.S. Census Bureau.

6. Public Health Data Provide publicly available health data of residents living within two miles of the proposed use(s), including rates of cancer, respiratory disease, low infant birth weight, and cardiovascular disease. This information may be obtained from sources such as the U.S. Environmental Protection Agency's EJSCREEN Tool.

7. Quality of Life and Public Health Protection Measures Describe plans to avoid, minimize, and mitigate any pollution emissions or environmental impacts both during construction and during operation, if any. Such efforts may include but are not limited to pollution reduction technologies, green infrastructure, energy efficiency or renewable energy elements, waste minimization, water conservation measures, and tree canopy expansion or vegetative buffers.

8. Public Engagement Describe efforts undertaken by the applicant prior to applying for a Special Use Permit to inform or engage the residents and businesses in the vicinity of the proposed project, if any.

9. Alternatives List reasonable alternatives to the proposed use(s), including alternative project sites.