



Phone: 478-751-6160
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Macon, Georgia 31206
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James A. Epps, Jr., Chairman

Laura M. Mathis, Executive Director

December 24, 2025

Mr. Dean Nelson
City of Forsyth
23 East Main Street
Forsyth, Georgia 31029

Re: DRI #4585 – Forsyth Technology Campus (City of Forsyth)

Dear Mr. Nelson:

The Middle Georgia Regional Commission (MGRC) has completed its review of the Development of Regional Impact (DRI) process for the Forsyth Technology Campus. MGRC carefully reviewed the information submitted by the local government and comments received from potentially affected agencies. Robins Air Force Base (78th CEG/CENPL) responded to indicate that they did not anticipate impacts from the proposed development. Georgia Environmental Protection Division, the Department of Public Health, North Central Health District 5-2, the High Falls Towaliga Watershed Alliance, Georgia Department of Transportation (GDOT), and the Monroe County Board of Commissioners responded affirmatively on expected impacts. These comments are provided, as submitted, in the order they were received, for your consideration:

Georgia Environmental Protection Division:

- This project will have impacts on air quality. The construction and operation of a data center at this location (along with the associated back-up generators) will likely require an air quality permit from the Stationary Source Permitting Program at the Georgia Environmental Protection Division. The air quality permit application process will require an assessment of criteria air pollutants (CAPs) and toxic air pollutants (TAPs) from the facility.

Department of Public Health, North Central Health District 5-2:

- In my capacity as the District 5-2 Health Director for the Georgia Department of Public Health, I oversee public health programs and services for a 13-county district which includes Monroe County and the City of Forsyth. One negative effect of the proposed project is the potential increase in mosquito breeding areas. Detention ponds associated with any type of development are rarely maintained and become choked with vegetation and can typically lead to an increase in several species of mosquitoes including *Culex quinquefasciatus*. Beyond that, the development will be changing the movement of water and causing additional water drainage by an increase in impervious surfaces. This will also impact wetlands and flood zones beyond even physical changes. Add to that the increase in the detritus from a facility of that size, and there will be an increase in *Aedes albopictus* mosquitoes as well. The environmental and potential increase in mosquito borne diseases should be given serious consideration in reviewing this proposed project.

High Falls Towaliga Watershed Alliance:

○ **Project drainage and watershed context**

The proposed Forsyth Technology Campus drains to the **Little Towaliga River**, a tributary of the **Towaliga River** system. This is a tributary and headwater system where land disturbance, impervious surface, and stream crossings produce more immediate and amplified impacts than in larger downstream channels.

The DRI does not identify the Little Towaliga River by name and does not evaluate tributary-scale or watershed-scale impacts.

○ **Figure 1 – Drainage context (attached)**

Note: Image file did not come through via email

Figure 1. Surface drainage from the proposed Forsyth Technology Campus flows into the **Little Towaliga River**, a tributary of the Towaliga River system. The arrow indicates downstream flow direction. Impacts occur in a headwater tributary system before waters reach the Towaliga River mainstem.

○ **Wetlands and floodplains are acknowledged but not evaluated**

DRI #4585 explicitly checks **YES** for the presence of **wetlands** and **floodplains** and acknowledges that **stream and floodplain crossings are required** to access portions of the site.

However, the DRI does not provide:

- Maps showing wetland and floodplain extent
- The number or location of proposed stream or floodplain crossings
- Floodplain storage loss calculations
- Downstream erosion or sediment transport analysis
- Long-term monitoring or enforcement commitments

Acknowledging sensitive resources without evaluating impacts is not sufficient for a project of this scale.

○ **Stormwater management claims are unsupported**

The DRI states that 20–25% of the site will be impervious and claims that detention and infiltration measures will “improve upon flow conditions.”

No supporting documentation is provided, including:

- Pre- and post-development hydrologic modeling
- Design storm criteria
- Maintenance responsibility
- Failure or overflow scenarios

Detention infrastructure does not replicate natural hydrology, particularly in floodplain and tributary settings.

○ **Water and wastewater capacity assertions lack documentation**

The DRI checks **YES** for sufficient water and wastewater treatment capacity while proposing:

- **1.5 MGD** of water demand
- **0.9 MGD** of wastewater flow
- **4–5 miles** of new water line extensions
- **10–15 miles** of new sewer line extensions

No capacity studies, treatment plant data, or downstream water-quality impact analyses are provided to support these conclusions.

○ **Alliance position**

The High Falls Towaliga Watershed Alliance finds that DRI #4585:

- Minimizes impacts to wetlands, floodplains, and tributary streams
- Fails to evaluate impacts to the Little Towaliga River
- Relies on conclusory statements rather than supporting analysis
- Treats major regional infrastructure expansion as routine

○ **Requests**

The Alliance respectfully requests that:

1. The Little Towaliga River be explicitly identified in the DRI
2. Tributary- and watershed-scale impact analyses be required
3. Wetland, floodplain, and stream-crossing impacts be mapped and quantified
4. Water and wastewater capacity claims be supported with documentation
5. The DRI be supplemented and re-circulated for review

Headwater and tributary systems warrant heightened scrutiny. The current DRI does not provide the level of analysis required for informed assessment.

Georgia Department of Transportation (GDOT):

- This Prior to the approval of any local processes (e.g., zoning, development agreements etc.), GDOT recommends that the trip generation be confirmed. ITE Trip Gen. 11th Edition shows approximately 11,900 new trips for the 160-Data Center land use code, substantially more than what is being shown using ITE Trip Gen. 12th Edition - GDOT District 3 cannot confirm 12th Edition values at this time.
- GDOT also recommends that the local government/s confirm that they support the assumed trip distribution - particularly the volume assumed to enter development driveways B, C and D using I-75 exit 193 (and driveway B even more specifically). I-75 exit 188 carries more traffic than exit 193 and there is more traffic from the south on I-75 using these exits than the north. The DRI traffic study shows 35% of new trips coming from the north and 35% coming from the south on I-75 and is assuming 25% of traffic entering driveways B thru' D is coming from exit 193. 15% of traffic entering driveway B is assumed from the north on Smith Rd (coming from exit 193), only 10% assumed entering from the south on Smith Rd (coming from exit 188). Given the current condition and configuration of Smith Rd, the land use in the area, the tight curves in the area of Floyd Rd and Harper Lane, and the fact that driveways B thru' D are shown south of those curves on Smith Rd (and access ~71% of the proposed development), are these distributions reasonable?

- GDOT recommends that the developer be required to further evaluate infrastructure improvements at the I-75 exit 188 interchange and SR 42 @ N Lee St intersection and be required to contribute to improvements there. The DRI traffic study shows the trip gen causing certain intersection approaches to degrade from LOS D to E and E to F in the build condition versus the future no-build condition. 95th percentile queuing analyses should also be explored to confirm whether infrastructure improvements are necessary on that basis. Note, should it be more reasonable to assume a higher percentage of trips will enter the site using I-75 exit 188, this will add justification to the need for improvements there.
 - Data centers can generate substantial construction traffic, so GDOT recommends construction schedules be provided and evaluated, and the local government/s require infrastructure improvements necessary to suitably handle construction traffic.
 - Note, any changes in land use for this development should require a revised traffic engineering study. Any work within the GDOT R/W will require submission of a Special Encroachment permit in our GPAS system to GDOT District 3. GDOT may require the above at that time if not already produced and provided.
-

Monroe County Board of Commissioners:

- Water – Water usage is projected to be 1.5 million gallons per day served by the City of Forsyth. Four to five miles of water lines will need to be run. The concern is that the City of Forsyth has evidenced as late as 2025 that the water supply produced by the City for existing customers is insufficient. There is an agreement for Monroe County to supply up to 10 million gallons per day if needed. This was used for some time in 2025. There is no agreement between the City and County to increase this amount and no agreement between the County and Macon Water Authority (MWA) to increase the current amount purchased. Major infrastructure would need to be done through Macon, Monroe County, and Forsyth to provide this amount of water. This also includes right-of-way procurement.
 - Road Improvement -It is noted that road improvements will need to be done. If so, Smith Road and/or Johnstonville Road will likely be affected. These roads are under County jurisdiction. The concern is the potential widening of these roads, the impact on County rights-of-way and County citizens, and the cost and approvals needed to complete the project. Who will bear the cost, do the work, approve the work, communicate with citizens to procure right-of-way, or communicate with utilities during relocation? Has the County been involved in these discussions? If not, when will this take place and is there some assurance that an agreement can be reached?
 - Political Recourse for County Citizens -The traffic, rights-of-way, and other potential encumbrances will be borne solely by the County citizens and the developer. Little if any residential development in the City will be affected. This is due to the area annexed being somewhat of a protrusion, or finger, out of the city. There is no political recourse for county citizens who are negatively impacted by this development. The elected representatives of the city do not represent those residences most affected by this project. There is no political recourse for them.
-

MGRC reviewed the proposed project's potential regional and inter-jurisdictional impact and consistency with the Department of Community Affairs Quality Community Objectives, Monroe County and the Cities of Culloden and Forsyth Joint Comprehensive Plan, Middle Georgia Regional Plan, Middle Georgia Regionally Important Resources Plan, and the region's Comprehensive Economic Development Strategy (CEDS). In reviewing the regional and local planning documents, MGRC notes that the development is generally consistent with the City of Forsyth's Comprehensive Plan, which designates the proposed site as mixed use, meaning that it may be appropriate for "hosting multiple, compatible use categories on the same parcel," according to the city's Comprehensive Plan. The city may wish to further define the mixture of uses on this parcel as part of a development agreement.

The 2024 Middle Georgia Regional Plan identifies this tract as being within an "area of rapid development." This plan notes that development has especially followed Interstate 75, with the plan recommending that "the local governments of these areas should act early to ensure that growth occurs in a manner which makes it possible to provide necessary public services while maintaining community character." Specific proposed implementation measures from the plan that may be relevant include "establish traffic-calming in residential neighborhoods and at connectivity points," and "ensure adequate availability of infrastructure prior to permitting new development."

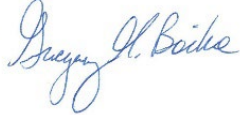
Consistent with the priority focus within the Regional Plan to continue improvements in regional air quality, MGRC also concurs with the comment regarding permitting needs related to air quality. Plant Scherer, located in Monroe County, is a significant contributor to nitrogen oxides (NOx) and fine particulate matter (PM2.5) emissions. As such, projects that increase emissions should be carefully considered in the context of ensuring attainment of the National Ambient Air Quality Standards (NAAQS).

Finally, the DRI Additional Information Form noted several potential areas of impact on the surrounding environment. MGRC reviewed the Traffic Study and other documents submitted as part of the DRI Additional Information Form. The traffic study recommends several site access improvement actions that the City of Forsyth may wish to require as a condition of approval. The Additional Information Form notes potential impacts to floodplains and wetlands as well. Within the preliminary site plan, two areas show proposed encroachments on the delineated 50-foot stream buffers. These occur on Parcel 015 005A (near an unnamed riverine wetland west of Primary Access #1) and on Parcel 027 025 (near White Creek immediately east of Primary Access #2). The City of Forsyth may wish to ask the developer to address any of these potential impacts.

MGRC notes that the estimated water usage may "vary greatly based on the need for cooling and cooling approach," according to the Additional Information Form. In consideration of future water demands, projects of a similar water demand scale in Georgia have been encouraged to evaluate the potential installation of advanced *waterless* cooling technologies or *near waterless* technology to reduce the burden on the drinking water supplies and increase the resiliency for both the project and the potable water system. This is provided to the City of Forsyth as additional information for consideration.

Please be advised that this concludes the DRI Review Process, and the City of Forsyth may proceed with the final official action it deems appropriate regarding the proposed project. It is encouraged that the City of Forsyth consider the materials presented in the DRI report when rendering its decision. The enclosed information is advisory in nature and under no circumstances should it be considered binding or infringing upon the city's right to determine the appropriateness of development within its boundaries.

Sincerely,

A handwritten signature in blue ink that reads "Greg Boike". The signature is written in a cursive style with a large initial "G".

Greg Boike
Director of Planning and Public Administration

cc: Affected Local Governments and Other Interested Parties (via email)
Georgia Department of Community Affairs (via email)

**Development of Regional Impact
Comments from Affected Parties**

Project ID: DRI #4585 – Forsyth Technology Campus (City of Forsyth)

Commenting Organization: 78 CEG/CENPL

Street Address: 505 Page Road

City: Warner Robins State: Ga Zip Code: 31098

Contact Person: Rod Eady Phone: 578-327-2910 Email: ernest.eady.3@us.af.mil

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:

Form Completed by: Rod Eady

Title: Robins AFB Community Planner

Signature: EADY.ERNEST.R.110 6479735 Digitally signed by EADY.ERNEST.R.1106479735 Date: 2025.12.08 13:11:53 -05'00'

Date: 8 Dec 2025

Mail, Fax, or Email this form to: Greg Boike
Middle Georgia Regional Commission
3661 Eisenhower Parkway, Suite MB102
Macon, GA. 31206
P: 478-751-6160
F: 478-751-6517
E: gboike@mg-rc.org

**Comments on DRI #4585 will be accepted beginning on December 8, 2025.
All comments are due by 11:59 PM on December 23, 2025.**

This request for comments has been sent to the following potentially affected parties: MGRC Council; City/county chief elected officials and key staff in the following counties: Butts, Crawford, Jasper, Jones, Lamar, Macon-Bibb, Monroe, Upson; School superintendents in the preceding counties; Development authorities of the preceding counties; Three Rivers RC; Northeast Georgia RC; GA Department of Natural Resources; GA Department of Transportation; Georgia Environmental Finance Authority; GA Department of Public Health; and U.S. Fish & Wildlife Service.

**Development of Regional Impact
Comments from Affected Parties**

Project ID: DRI #4585 – Forsyth Technology Campus (City of Forsyth)

Commenting Organization: Georgia Department of Public Health North Central Health District 5-2

Street Address: 201 Second Street, Suite 1100

City: Macon State: GA Zip Code: 31201

Contact Person: Kim A. Cook, MD, MSPH Phone: 478-260-1995 Email: kim.cook@dph.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:

In my capacity as the District 5-2 Health Director for the Georgia Department of Public Health, I oversee public health programs and services for a 13-county district which includes Monroe County and the City of Forsyth. One negative effect of the proposed project is the potential increase in mosquito breeding areas. Detention ponds associated with any type of development are rarely maintained and become choked with vegetation and can typically lead to an increase in several species of mosquitoes including Culex quinquefasciatus. Beyond that, the development will be changing the movement of water and causing additional water drainage by an increase in impervious surfaces. This will also impact wetlands and flood zones beyond even physical changes. Add to that the increase in the detritus from a facility of that size, and there will be an increase in Aedes albopictus mosquitoes as well. The environmental and potential increase in mosquito borne diseases should be given serious consideration in reviewing this proposed project.

Form Completed by: Kim A. Cook, MD, MSPH Title: District Health Director

Signature:  Date: 12/18/2025

Mail, Fax, or Email this form to: Greg Boike
Middle Georgia Regional Commission
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Macon, GA. 31206
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**Development of Regional Impact
Comments from Affected Parties**

Project ID: DRI #4585 – Forsyth Technology Campus (City of Forsyth)

Commenting Organization: Georgia Environmental Protection Division

Street Address: 4244 International Parkway, Suite 120

City: Atlanta State: GA Zip Code: 30354

Contact Person: James Boylan Phone: (470) 524-0697 Email: James.Boylan@dnr.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:

This project will have impacts on air quality. The construction and operation of a data center at this location (along with the associated back-up generators) will likely require an air quality permit from the Stationary Source Permitting Program at the Georgia Environmental Protection Division. The air quality permit application process will require an assessment of criteria air pollutants (CAPs) and toxic air pollutants (TAPs) from the facility.

Form Completed by: James Boylan

Title: Chief, Air Protection Branch

Signature: James Boylan Digitally signed by James Boylan
Date: 2025.12.10 20:58:03 -05'00'

Date: 12/10/2025

Mail, Fax, or Email this form to: Greg Boike
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Development of Regional Impact Comments from Affected Parties

Project ID: DRI #4585 – Forsyth Technology Campus (City of Forsyth)

Commenting Organization: Georgia Department of Transportation

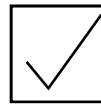
Street Address: 115 Transportation Blvd

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:

SEE ADDITIONAL SHEET

Form Completed by: Daniel Trevorrow, P.E.

Title: District Traffic Engineer

Signature: 

Date: 12/23/2025

Mail, Fax, or Email this form to:

Greg Boike
Middle Georgia Regional Commission
3661 Eisenhower Parkway, Suite MB102
Macon, GA. 31206
P: 478-751-6160
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Development of Regional Impact

Comments from Affected Parties

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Form Completed by: Daniel Trevorrow, P.E.

Title: District Traffic Engineer

Signature: 

Date: 12/23/2025

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The DRI does not identify the Little Towaliga River by name and does not evaluate tributary-scale or watershed-scale impacts.

Figure 1 – Drainage context (attached)

Figure to be provided by the **High Falls Towaliga Watershed Alliance**

Figure 1. Surface drainage from the proposed Forsyth Technology Campus flows into the **Little Towaliga River**, a tributary of the Towaliga River system. The arrow indicates downstream flow direction. Impacts occur in a headwater tributary system before waters reach the Towaliga River mainstem.

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Requests

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Respectfully submitted,

Betty Eskew

Vice President

High Falls Towaliga Watershed Alliance

hftwallc@gmail.com

404-509-5227

**Development of Regional Impact
Comments from Affected Parties**

Project ID: DRI #4585 – Forsyth Technology Campus (City of Forsyth)

Commenting Organization: Monroe County Board of Commissioners

Street Address: 38 West Main St.

City: Forsyth State: GA Zip Code: 31029

Contact Person: Jim Hedges Phone: 478-994-7000 Email: jhedges@monroecoga.org

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:

Water – Water usage is projected to be 1.5 million gallons per day served by the City of Forsyth. Four to five miles of water lines will need to be run. The concern is that the City of Forsyth has evidenced as late as 2025 that the water supply produced by the City for existing customers is insufficient. There is an agreement for Monroe County to supply up to one million gallons per day if needed. This was used for some time in 2025. There is no agreement between the City and County to increase this amount and no agreement between the County and Macon Water Authority (MWA) to increase the current amount purchased. Major infrastructure would need to be done through Macon, Monroe County, and Forsyth to provide this amount of water. This also includes right-of-way procurement.

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Form Completed by: Richard Dumas Title: Public Information Officer

Signature: Richard Dumas Digitally signed by Richard Dumas Date: 2025.12.23 11:48:15 -05'00' Date: 12/23/25

Mail, Fax, or Email this form to: Greg Boike
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