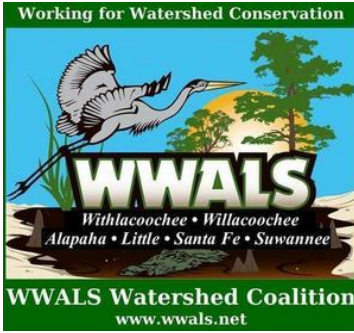


May 11, 2026



PO Box 88, Hahira, GA 31632  
850-290-2350  
[wwalswatershed@gmail.com](mailto:wwalswatershed@gmail.com)  
[www.wwals.net](http://www.wwals.net)  
[Facebook](#) [Instagram](#)  
[YouTube](#) [Meetup](#)

WWALS is an IRS 501(c)(3) nonprofit charity est. June 2012.

*WWALS advocates for conservation and stewardship of the surface waters and groundwater of the Suwannee River Basin and Estuary, in south Georgia and north Florida, among them the Withlacoochee, Willacoochee, Alapaha, Little, Santa Fe, and Suwannee River watersheds, through education, awareness, environmental monitoring, and citizen activities.*



To: James Horton  
SGRC  
1937 Carlgon Adams Drive, Valdosta, GA 31601  
[jhorton@sgrc.us](mailto:jhorton@sgrc.us)  
229-333-5277

Re: Project Arrowhead, DRI Project #4689

James,

Thank you for the opportunity to comment on this application.

Suwannee Riverkeeper and its parent body WWALS Watershed Coalition are affected, since we work for conservation of the entire 10,000-square-mile Suwannee River Basin, including the Alapaha River watershed, and the underlying groundwater.

According to the Suwannee-Satilla Regional Water Planning Council in their [WATER & WASTEWATER FORECASTING TECHNICAL MEMORANDUM](#) of March 2024, population growth projections have been decreased, causing water use and wastewater use also to be less.

Datacenters could reverse that trend.

### Power and Water

Datacenters require additional power plants, which need cooling water. While none of those power plants are likely to be in the Suwannee, Satilla, or St. Marys Basins, if they are anywhere above the Floridan Aquifer that will affect us. We all use groundwater for drinking, agriculture, recreation, and industry.

None of the many state bills to rein in datacenters passed; not even any to prevent other ratepayers having to pay for datacenter electricity.

Citizens expecting to benefit from the promised \$20 million a year in tax revenue may be surprised to discover their lowered property taxes eaten up by increased power bills.

The DRI application says: “Georgia Power is in the process of completing an energy study for the project.”

The DRI should not proceed without a firm commitment by Georgia Power for energy for the project, including not passing on charges to other ratepayers, and using renewable energy for the extra power, rather than more water-using gas plants.

Better yet, such a datacenter should be required to generate its own energy from solar and batteries. Many of those could be on top of its own buildings and parking lots.

### Stormwater Management

Datacenters require extensive impervious surfaces (roofs, parking lots, driveways) which are likely to cause more runoff into nearby waterways, carrying pollutants. The DRI materials say 30.8% of a very large site. For 1,066 acres that would be 328 acres of impervious surface.

The map on page 19 of the SGRC package for DRI #4689 has a pointer to a “PROPOSED STORMWATER MANAGEMENT FACILITY” and that map shows several other blue-colored areas which presumably are intended to be other retention ponds. But there is no analysis of how much runoff could come off all that impervious surface and how much detention pond area and depth would be needed to contain it.

Valdosta has famously underestimated how big their catch basins should be at the entrance to their Withlacoochee Wastewater Treatment Plant (WWTP) to avoid sewage spills. The result has been repeated million-gallon-plus spills, especially when a major storm dropped much rain directly on Valdosta.

Underestimated retention ponds at this datacenter campus could result in massive runoff overflowing those detention ponds, carrying contaminants from all those roofs, driveways, and parking lots into the Alapaha River. SGRC and the DRI should require a study on how big the detention ponds need to be.

### **Groundwater Usage**

The SGRC summary of the DRI application says “**Water supply** needs are expected to be .05 MGD (Million Gallons per Day) and the water is proposed to be pumped from the Floridian Aquifer from an on-site well.”

Expected by whom? Where is an independent verification of this estimate? Where are records from other datacenters by the same builder or end customer?

As everyone has heard, such promises may not be honored, see, for example, Melissa Koenig, MSN, May 10, 2026, [Data center caught using 30 million gallons of 'unbilled' water as Georgia residents' taps drizzle.](#)

The DRI should be at least as stringent as the [Irwin County Data Center Ordinance](#), which requires:

*(d) Water Usage Standards.*

*(1) Only closed-loop cooling systems are permitted in Irwin County.*

*(2) There shall be no discharge of cooling water into public sewers or ground without treatment.*

*(3) Before a certificate of occupancy is provided, all data centers shall submit a hydrogeologic study conducted by an independent third-party engineering firm showing estimated annual water usage. Such report should compare estimated water usage to the prior owner/user of the subject property or of that of similar surrounding areas.*

The Georgia Environmental Protection Division (EPD) should include specific drought conditions on withdrawal amounts based on adjacent groundwater and surface water levels. Additionally, EPD should require a drought contingency plan.

EPD should also conduct an aquifer drawdown study to assess water withdrawal effects on surrounding users, such as nearby agricultural withdrawals. See for example EPD's study with groundwater withdrawal permits adjacent to the Bryan County Hyundai Motor Group Metaplant America (HMGMA).

### **Wastewater Discharge**

There is no NPDES permit for this facility. The DRI should not be completed until such a permit is granted.

EPD should carefully study how much treated wastewater will result, and where and when it will go. It is likely to be a significant tributary of the Alapaha River, especially in drought conditions such as we are having now.

No permit, NPDES or DRI, should be issued without such a wastewater study.

### **Hyper-Scale Datacenters**

These are not search or cloud datacenters. They are hyper-scale datacenters for so-called artificial intelligence (AI). The AI industry may be a bubble and putting too many eggs in one basket for jobs and tax revenue is not prudent when the bubble may pop at any time. That could leave the local jurisdiction holding a contract with a shell company that has no assets. The local jurisdiction and the state would then have a mess to clean up, physically, environmentally, and financially.

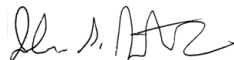
### **Public Hearings**

I call for a Public Hearing on this DRI application.

Irwin County held three Public Hearings on its Data Center Ordinance, and added to it after citizen input.

For the rivers and the aquifer,

John S. Quarterman



Suwannee Riverkeeper

229-560-4317