

Jennifer Rivera (Administration)

From: Candace Bailey <[REDACTED]>
Sent: Wednesday, December 10, 2025 8:05 PM
To: David Gibbs (County Commission); Jeff Stowe (County Commission); Kathy Cooper (County Commissioner); Gregg Poole (County Commissioner); Billy Powell (County Commission)
Cc: Jennifer Rivera (Administration)
Subject: Third Request for Independent Testing and Project Visibility - Project Turbo
Attachments: Project Turbo Study Request - Board of Commissioners.pdf; Ethical and Environmental Accountability_Project Turbo_ Board of Commissioners.pdf; Third Request for Studies and Visibility_Project Turbo_ Board of Commissioners.pdf

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Subject: Third Request for Independent Testing and Project Visibility – Project Turbo

Commissioners Gibbs, Cooper, Powell, Poole, and Stowe,

This is my third communication regarding the proposed data center project. My previous letters highlighted unresolved issues: the applicant's claims lack verification, and the County failed to document its due diligence. New statewide actions make these gaps unacceptable.

No independent verification has been made available.

Hall County has produced no public evidence that it has required or obtained an independent analysis of projected:

- Water use
- Wastewater and thermal output
- Electricity demand and peak load
- Stormwater implications
- Noise levels
- Additional environmental impacts

Relying only on developer-provided numbers is insufficient for a facility with 24/7 industrial impacts.

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The state has reopened oversight because the risks are real.

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Residents cannot inherit undefined long-term costs.

State and national reporting shows repeated instances of counties absorbing unplanned expenses because of under-reported consumption and insufficient pre-build agreements. Without independent verification and binding contractual cost assignments, Hall County risks the same outcome.

These items must be produced before any approval.

The County should release the following before considering any data center proposal:

1. All environmental, utility, and infrastructure assessments.
2. All communications with the applicant regarding projected usage.
3. The rationale for canceling the site visit.
4. A statement confirming whether independent verification has been requested or completed.
5. A clear list of which infrastructure costs the developer, not residents, will be required to fund.

If these documents do not exist, the County is not in a position to vote on this project.

No additional data center approvals should proceed until standards are met.

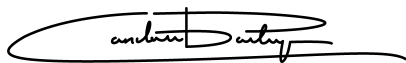
Given the statewide regulatory changes and the actions of peer counties, Hall County cannot responsibly approve another data center without:

- Independent verification of all impact projections.
- Full public transparency.
- Binding developer-funded infrastructure commitments.

Proceeding without these safeguards would expose residents to avoidable risk.

I expect the Commission to demonstrate through its public actions and documentation that it will apply these standards before considering any data center approval.

Respectfully,



Candace Bailey
4144 Belvedere Drive
Gainesville, GA 30506



===== Forwarded message =====

From: Candace Bailey <[REDACTED]>
To: "dgibbs" <dgibbs@hallcounty.org>, "jstowe" <jstowe@hallcounty.org>,
"gpoole" <gpoole@hallcounty.org>, "kcooper" <kcooper@hallcounty.org>,
"bpowell" <bpowell@hallcounty.org>

Cc: "jrivera"<jrivera@hallcounty.org>

Date: Wed, 29 Oct 2025 21:29:20 -0400

Subject: Ethical and Environmental Accountability - Project Turbo

===== Forwarded message =====

Subject: Ethical and Environmental Accountability — Project Turbo Data Center

Commissioners Gibbs, Cooper, Powell, Poole, and Stowe,

As the governing body now responsible for determining whether Project Turbo advances, you hold the authority and obligation to ensure this decision meets the highest standards of transparency, environmental stewardship, and public accountability.

This letter supplements my earlier communication, “Project Turbo Study Request – Board of Commissioners,” which was submitted through the Hall County website for public comment before the last meeting, as well as by email to each of you. Despite that submission, it was not included in the published meeting notes. I have attached the original letter again for your reference. The concerns outlined there remain unaddressed in the materials currently before you.

The planning packet with the recommendation for advancement, created by the Planning Board before its suspension, describes a 900,000-square-foot industrial facility with an on-site power substation, drawing from a 6-inch City of Gainesville water line with an estimated 225,000 gallons per day, cited as a pricing example, **not a daily cap on water usage**. The applicant lists air-cooled and closed-loop systems but provides **no verified water-use data, renewable-energy sourcing, or waste-management plan**. The submittal includes noise and traffic analysis but **omits any independent environmental review, community-benefit agreement, or decommissioning requirement**.

Ordinarily, a project of this magnitude would undergo a **Development of Regional Impact (DRI) review** by the Georgia Department of Community Affairs (DCA). **That process evaluates significant developments for regional effects on water supply, power demand, transportation, and infrastructure, and provides a level of public transparency that local review alone cannot match.**

However, as reported by the *Atlanta Journal-Constitution* (July 2025), the DCA has **paused all new DRI reviews for data-center projects statewide** because the surge of proposals exposed gaps in how the regulations define and assess this industry. The state intends to rewrite those rules, but for now, the oversight process is simply inactive. Local governments may still approve projects, but they must do so **without** the benefit of that regional analysis or state-level accountability.

In practical terms, this means the **entire burden of due diligence now rests with the Hall County Board of Commissioners**. You are the final safeguard for environmental responsibility, infrastructure planning, and public transparency.

At this point, the question is not whether the applicant has provided enough (it hasn’t), it’s whether the Board will fulfill its duty to the community by requiring complete, independent verification before any vote. Advancement without those measures would signal that developer assurances outweigh public accountability.

Before any decision is made, I urge you to require:

1. A third-party, developer-funded environmental and infrastructure review made public before approval.
2. Full disclosure of projected power demand, water usage, and source sustainability, with enforceable limits.

3. A documented renewable-energy or verified-offset plan.

4. A binding community-benefit and decommissioning agreement entered into the record.

These measures are not barriers to progress. They are the bare minimum for ethical governance. Hall County now occupies a unique position: with the state's oversight on pause, this Board must demonstrate leadership by setting a standard of transparency and integrity that others can follow.

Thank you for your time and your continued service to Hall County Residents.

Respectfully,



Candace Bailey
4144 Belvedere Drive
Gainesville, GA 30506

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From: Candace Bailey <[REDACTED]>

To: "dgibbs" <dgibbs@hallcounty.org>, "jstowe" <jstowe@hallcounty.org>, "gpoole" <gpoole@hallcounty.org>, "bpowell" <bpowell@hallcounty.org>, "kcooper" <kcooper@hallcounty.org>

Cc: "jriviera" <jriviera@hallcounty.org>

Date: Wed, 22 Oct 2025 16:56:46 -0400

Subject: Request for Comprehensive Environmental & Infrastructure Review - Project Turbo

===== Forwarded message =====

Commissioners Gibbs, Cooper, Powell, Poole and Stowe,

I am writing to address the proposal for the 900,000-square-foot Project Turbo data center. This project's unprecedented scale necessitates a rigorous, independent, and transparent review process that has not yet been provided to the community.

The project's scale demands more than a brief site visit or assurances from the developer. Before any decision is made, the County must commission a **Developer-Funded Independent Review** (at the full cost of the property developer) and publicly release independent studies addressing:

1. Water Use & Supply Impact

- a. **Independent Water Demand Study:** Include average and peak daily consumption projects, broken down by source type (potable vs reclaimed).

- b. **Source Capacity & Drought Contingency:** Verify whether existing municipal or regional systems can support the site during drought conditions without affecting residential or agricultural users.
 - c. **Reclaimed Water Feasibility Report:** Determine infrastructure needs and costs to supply non-potable reclaimed water exclusively.
 - d. **Public Reporting Requirement:** Mandate third-party auditing and monthly publication of water-use data once the facility is operational.
 - e. **Watershed Modeling:** Assess projected runoff and consumption effects on nearby creeks and tributaries feeding into Lake Lanier.
2. **Air Quality & Emissions**
- a. **Baseline Monitoring:** Measure current NO_x, SO₂, particulate matter and VOC levels near the site before construction.
 - b. **Diesel Generator Emission Modeling:** Quantify expected emissions during both routine testing and emergency operation of generators, including cumulative impact from all units.
 - c. **Fuel Handling & Storage Plan:** Require disclosure of fuel quantities stored on-site for generators, containment design and spill-response procedures.
 - d. **Ongoing Compliance Monitoring:** Mandate installation of real-time air sensors with quarterly reports published to a public portal.
3. **Noise & Vibration**
- a. **Predictive Noise Study:** Evaluate expected decibel levels at property lines, including generator tests, HVAC, and 24-hour cooling operations.
 - b. **Mitigation Plan:** Require acoustic enclosures, sound walls, and nighttime testing prohibitions.
 - c. **Continuous Monitoring:** Establish baseline and post-construction sound testing, with exceedance penalties tied to operational permits.
 - d. **Vibration Impact Study:** Analyze effects of heavy truck traffic and construction vibration on surrounding residential foundations and wells.
4. **Power Infrastructure & Ratepayer Impact:**
- a. **Electrical Load Analysis:** Determine total megawatt demand at build-out and proportion of county grid capacity consumed.
 - b. **Substation & Line Upgrade Cost Breakdown:** Identify who funds the infrastructure, the developer, Georgia Power shareholders, or local ratepayers.
 - c. **Peak Demand Scenarios:** Evaluate risks of brownouts or service degradation during high-load months.
 - d. **Renewable Integration Feasibility:** Require the developer to include on-site or purchase-based renewable offsets to reduce fossil dependency.
 - e. **Public Access to Georgia Power Agreements:** Make all service and incentive contracts publicly available before approval.
5. **Traffic, Roadway, & Stormwater Management**
- a. **Construction Traffic Impact Study:** Assess daily truck volume, haul routes, dust generation, and wear on O'Kelley, and Candler Roads.
 - b. **Operational Traffic Study:** Include employee and maintenance traffic, shift scheduling, and long-term road maintenance projections.
 - c. **Draining & Stormwater Modeling:** Quantify new impervious surface runoff, sediment load, and downstream effects on nearby creeks and offshoots.
 - d. **Erosion & Sediment Control Plan:** Require third-party inspections during construction, with stop-work triggers for violations.
 - e. **Vegetative Buffer & Floodplain Delineation:** Map existing buffers and prohibit encroachment within 300 feet of any stream or tributary
6. **Visual & Environmental Aesthetics**

- a. **Light Pollution Assessment:** Evaluate 24-hour lighting effects on surrounding residences and wildlife.
- b. **Tree Canopy Study:** Quantify planned removal and require equivalent replanting or canopy offset.
- c. **Landscape Screening Plan:** Define long-term maintenance obligations for berms and vegetation screens.

7. Economic & Fiscal Transparency

- a. **Net Fiscal Impact Study:** account for tax incentives, PILOT agreements, infrastructure costs, and maintenance liabilities.
- b. **Cost per Permeant Job Analysis:** Present public subsidies divided by permanent job creation.
- c. **Public Disclosure:** Publish all incentive agreements before final approval.

8. Public Safety & Emergency Preparedness

- a. **Emergency Response Capacity Assessment:** Evaluate local fire, EMS, and hazmat capability for fuel or electrical incidents.
- b. **Hazardous Materials Inventory:** Require disclosure of any chemicals or refrigerants stored on-site.
- c. **Contingency Planning:** Include coordinated drills and funding contributions to local emergency services.

9. Decommissioning, Accountability & Oversight

- a. **Decommissioning Bond:** Require a performance bond sufficient to cover demolition and site restoration.
- b. **Operational Compliance Reviews:** Mandate five-year environmental and infrastructure performance audits.
- c. **Community Oversight Committee:** Create a citizen-appointed board to review compliance data and issue recommendations.
- d. **Transparency Portal:** Establish a public dashboard for water, air, and noise metrics, updated quarterly.

Hall County residents deserve more than board assurances and marketing figures. A billion-dollar industrial facility of this magnitude warrants a transparent, data-driven review process.

I urge the Board to **table any vote** until these independent studies are complete, reviewed publicly, and incorporated into the final decision record.

Thank you for your time and taking these concerns seriously.

Respectfully,

Candace Bailey
4144 Belvedere Drive
Gainesville, GA 30506



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