

ENVIRONMENTAL PROTECTION DIVISION  
PUBLIC NOTICE  
WATERSHED PROTECTION BRANCH

May 5, 2026  
Notice Issue Date

Clayton County  
City / County

June 4, 2026  
Notice Close Date

SAS-2025-00047  
Control Number

Sec. 401 Water Quality Certification  
Ft. Gillem Data Center– US Army Corps of Engineers Sec. 404 Permit Application

This notice is issued to inform the public that a request has been received for water quality certification (WQC) in accordance with Section 401 of the Clean Water Act. The public is invited to comment during this 30-day period on the proposed activity. Information pertaining to the project is attached to this notice. Since the request is specific to the WQC, only comments pertaining to water quality are considered under the certification review process. Comments may be submitted via e-mail to: [EPD.WQC@dnr.ga.gov](mailto:EPD.WQC@dnr.ga.gov). Comments may also be provided in writing to: Program Manager, Wetlands Unit, 2 Martin Luther King, Jr. Dr. SE, Suite 1052 East, Atlanta, GA 30334. Include the words “Water Quality Certification Comment” and the Control Number above in the e-mail subject line or at the top of the first page of written comments to ensure that your comments will be forwarded to the appropriate staff. For additional information, contact Dewey Richardson at [dewey.richardson@dnr.ga.gov](mailto:dewey.richardson@dnr.ga.gov).

Type of Permit Application: 401 Water Quality Certification

Applicable Law: Federal Clean Water Act, 33 U.S.C. § 1341

Applicable Rules: 40 CFR part 121

Description and Location of Proposed Activity:

GA Forest Park Land, LLC is seeking a Section 401 Water Quality Certification for aquatic resource impacts associated with the construction of an approximately 2-million square foot (sf) data center facility, along with an adjacent substation. The approximately 153-acre project site is located east of Ryan Road and South of Slate Road, within the redeveloped Fort Gillem Industrial Park in Forest Park, Georgia (33.629299, -84.332005). According to the Request for 401 WQC, the project proposes the construction of a single two-level data center building, which will house seven data halls (fourteen total) per level totaling approximately 850,000 square feet of floor area and one adjacent substation, on a 55.85-acre parcel adjacent to the existing Phase 1 data center within the redeveloped Fort Gillem Industrial Park in Forest Park, Georgia.

The project, as currently proposed, requires a USACE Section 404 permit. Construction of the overall development would be completed in two phases: 1) Phase 1, authorized on March 7, 2025, will include the permanent fill of 144 linear feet of perennial stream for the construction of two culverted crossings; 2) Phase II, as currently proposed, would include additional permanent impacts to 636 linear feet of intermittent stream and 5.79 acres of wetland. In order to offset the impacts associated with Phase I of the development, the permittee purchased the required 1,728 legacy stream credits from the Little Sandy Creek 2 Mitigation Bank on January 4, 2025. For Phase II of the development, the applicant is proposing the purchase of 2,289.40 legacy stream credits (or 318 non-perennial (2018) stream credits), and 34.8 legacy wetland credits (or 4.28 depressional/flat (2018) wetland credits and 0.07 slope (2018) wetland credits).

Name and Address of Permit Applicant:

Dominic Reinecker  
GA Forest Park Land, LLC  
1776 Peachtree Street NW  
Atlanta, Georgia 30309



January 23, 2026

Ms. Yaling Covey  
Georgia Environmental Protection Division  
Wetlands Unit  
2 Martin Luther King Jr. Drive SE  
Suite 1456, East Tower  
Atlanta, Georgia 30334

**Subject: Request for Section 401 Water Quality Certification  
Ft. Gillem Data Center  
Clayton County, Georgia  
USACE File No. SAS-2025-00047  
Corblu Project No. 02-060225**

Dear Ms. Covey:

On behalf of our client GA Forest Park Land LLC, please accept this request for Section 401 Water Quality Certification (401 WQC) for the Ft. Gillem Data Center (USACE File No. SAS-2025-00047). Please note, the required pre-filing meeting with Georgia Environmental Protection Division (EPD) was held on November 25, 2025. A US Army Corps of Engineers (USACE) individual Permit application was submitted January 22, 2026 (Appendix A). As required, this request includes the Minimum Contents of a Request for 401 WQC as follows:

**1. Description of the Proposed Activity**

GA Forest Park LLC proposes to develop and construct an approximately +/- 850,000 square feet (SF) data center and substation on a 55.85-acre site located south of Slate Road and southeast of Falcon Court within the City of Forest Park, Clayton County, Georgia (Figure 1). This facility, designated as the Ft. Gillem Data Center – Phase 2, constitutes an expansion of the Phase I data center (an approximately 97.58-acre parcel located to the west), which received approval from the U.S. Army Corps of Engineers on March 7, 2025 (SAS-2025-00047).

The overall purpose of the proposed Ft. Gillem Data Center – Phase 2 is to develop additional, large-scale data center capacity within the Atlanta metropolitan region to meet the increasing demand for secure, reliable, and energy-efficient data processing and storage infrastructure. The project specifically proposes the construction of a single two-

level data center building, which will house seven data halls (fourteen total) per level totaling approximately 850,000 square feet of floor area and one adjacent substation, on a 55.85-acre parcel adjacent to the existing Phase 1 data center within the redeveloped Fort Gillem Industrial Park in Forest Park, Georgia. The selected site is zoned industrial, which supports “*storage and warehousing facilities, technology related manufacturing with offices, auto repair, utility storage yards, structures which combine office and warehouse/distribution functions, truck terminals, and similar structures and other businesses that are manufacturers but do not necessarily conflict with commercial uses*”<sup>1</sup>, is appropriate for data center uses as exhibited on the City of Forest Park’s Comprehensive 2023 Plan, ensuring consistency with existing and planned zoning. The Phase 1 data center is located within the same industrial zone area. The established industrial area provides appropriate infrastructure, compatible land use, access to major transportation and utility networks, and access to the high-speed modern fiber networks essential for data center operations. Additionally, suitable electrical infrastructure ensures uninterrupted operations and enhanced network reliability.

The need for this project is driven by the continued growth of data-intensive industries and emerging technologies such as cloud computing, artificial intelligence, and machine learning, all of which require substantial increases in data transmitting and storage capacity as the reliance on data-intensive technologies continues to expand across commercial, industrial and governmental industries. With this growth, additional data storage and transmission facilities are required to ensure reliable storage and processing capabilities. The project will provide secure, reliable, and high-capacity digital infrastructure to meet data storage needs within the greater Atlanta metropolitan area, while also supporting the increasing regional need for resilient data infrastructure, and essential digital communication growth.

In addition to serving critical technological functions, the project will contribute to the economic vitality of the region through an estimated \$3.5 billion in construction investment, the creation of approximately 2,000 temporary construction jobs, and 50–75 permanent operational positions. The proposed facility represents a compatible and beneficial reuse of a previously developed site within the Fort Gillem Industrial Park, furthering local

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<https://cms2.revize.com/revize/forestparkga/Documents/Departments/Planning%20and%20Community%20Development/Forest%20Park%20Comprehensive%20Plan/Forest%20Park%202023%20Comprehensive%20Plan-Final.pdf?t=202508290858580&t=202508290858580> Pg. 72

redevelopment goals while minimizing land use conflicts and supporting long-term economic stability in the City of Forest Park.

Applicant: Dominic Reinecker  
 Company: GA Forest Park Land LLC  
 Address: 1776 Peachtree Street, NW  
 Atlanta, Georgia 30309  
 Email: [dreinecker@tpa-grp.com](mailto:dreinecker@tpa-grp.com)  
 Phone: 770-436-3400

**2. Specific Location of Any Discharge(s) that May Result from the Proposed Activity**

The proposed development will result in unavoidable impacts to 636 linear feet (LF) of intermittent stream and 5.79 acres of wetland. Compensatory stream mitigation will be purchased from Rocky Creek Mitigation Bank and compensatory wetland mitigation will be purchased from Yellow River Mitigation bank, both approved banks in the primary service area per the USACE, Savannah District mitigation guidelines (i.e., Upper Ocmulgee River Basin; HUC – 03070103).

Please refer to the summary table below for overall project information and the attached Figure 2 for the location of aquatic resources on the Ft. Gillem Data Center site, and Figure 3 and Appendix B for the proposed location of fill material in wetlands and streams.

**Table 1. Project Summary Information**

<b>Existing Site Information</b>	
Total Site Acreage	55.85
Total Linear Feet of Perennial Streams	1,275.9
Total Linear Feet of Intermittent Streams	1,298.67
Total Wetland Acreage	5.79
Total Open Water Acreage	0
<b>Proposed Site Development</b>	
Total Acres Developed	39.59
Total Linear Feet of Perennial Stream Impacts	0
Total Linear Feet of Intermittent Stream Impacts	636
Total Acres of Wetland Impacts	5.79
Total Acres of Open Water Impacts	0

### **3. Diagram of the Proposed Activity Boundaries in Relation to Local Street, Roads and Highways**

Please refer to Figure 1 and Appendix B.

### **4. Description of Current Site Conditions**

#### **4.1 Site Background Information**

The Ft. Gillem Data Center – Phase 2 consists of an approximately 55.85-acre site located on North Boundary Road within the former military base Fort Gillem (the “Property”). Fort Gillem operated from 1941 to 1980 as a logistical center for the United States military. The Property consisted of wooded and grassed land on the northern portion of Fort Gillem (i.e., the Property). To the west of the Property, the U.S. Army landfilled various waste materials. These landfilling activities ceased in 1980. Over the last 40 years, the U.S. Army has conducted extensive site characterization, corrective action, and risk assessments of the former Fort Gillem landfill and the Property.

#### **Assessment and Remediation of Soil and Groundwater by the Army**

The eastern portion of the Property is a portion of a tract the Army historically referred to as “Priority Parcel 1.” From approximately 2012 through 2016, the Army completed various soil and groundwater assessments within Priority Parcel 1. The Army completed at least two rounds of soil remediation through the excavation and offsite disposal of impacted soil. In 2017 the Army determined all remedial action necessary to protect human health and the environment had been completed for Priority Parcel 1 and transferred this parcel to non-federal ownership pursuant to the Defense Base Closure and Realignment Act (BRAC).

The western portion of the Property is a portion of a tract historically referred to as the “North Landfill Area.” While the larger parent parcel was referred to as the North Landfill Area, it appears that significant landfilling activities did not occur on the portion of the North Landfill Area that is located on the Property. Similar to Priority Parcel 1, the Army completed extensive assessment and remediation within the North Landfill Area. These activities extended onto the portion of the North Landfill Area that is located on the Property and the Army completed excavation and disposal activities of impacted soil in approximately four areas on the Property. In 2023 the Army determined all remedial action necessary to protect human health and the environment that had been completed for the North Landfill Area and transferred the North Landfill Area to non-federal ownership under

BRAC.

### **Assessment of Surface Water and Sediment by the Army**

The Army also completed an assessment of surface water and sediment at the North Landfill Area, including the western portion of the Property, with the most recent data from 2018. The Army's 2018 investigation included four sample locations (FTG-01-SWSD07 through FTG-01-SWSD10) within the stream on the Property. Additionally, sample location FTG-01-SWSD11 was just north of the Property boundary on non-Fort Gillem property.

Surface water and sediment samples were analyzed for Volatile Organic Compounds (VOC), Semi-volatile Organic Compounds (SVOC), pesticides, polychlorinated biphenyls (PCBs), and Target Analyte (TAL metals). The Army compared surface water sample results to the Georgia Instream Water Quality Standards ("IWQS") or the Ambient Water Quality Standards ("AWQS") if no IWQS was established. The Army compared sediment sample results to the November 2018 EPA residential regional screening levels ("RSLs") as well as the industrial RSLs. Additionally, results for metals and pesticides were compared to the Fort Gillem background values.

No VOCs or SVOCs were detected in the surface water samples. The pesticide dieldrin was detected at a concentration exceeding the IWQS and the background levels in the surface water sample collected from FTG-01-SWD0-7, which is the most upstream sample location and on the southern boundary of the Property. Therefore, this result represented offsite surface water flowing onto the Property. There were no exceedances of the IWQS for dieldrin in the downstream samples. Zinc was detected in the northern offsite sample at a concentration that exceeded the IWQS and the background values. There were no zinc exceedances in the surface water samples collected on the Property.

Benzo(a)pyrene was detected in stream sediment from FTG-01-SWSD07 at a concentration that exceeded the residential RSL and slightly exceeded the industrial RSL. Again, this sample was the most upstream sample right on the Property boundary and therefore reflects offsite impacts flowing onto the Property. Importantly, downstream sample locations on the Property were non-detect for benzo(a)pyrene. Other related benzo- compounds were detected at FTG-01-SWSD07 at concentrations above the residential RSLs but below the industrial RSLs. There were no downstream detections of these constituents on the Property.

The relevant figures and tables from the Army's assessment of surface water and sediment sampling are attached (Appendix C).

### **Additional Soil Assessment under Georgia' Brownfield Program**

In addition to the Army's activities described above, the Property is also enrolled in Georgia's Brownfields Program. In October 2025, Terracon completed Phase II soil sampling on behalf of the Brownfields applicant across the Property, with a higher concentration of borings in the areas with historic exceedances that were remediated by the Army. The soil sampling included 41 sample locations with multiple samples collected from various depths for most of the borings (125 samples total). Volatile Organic Compounds and Semi-volatile Organic Compounds were not detected above residential screening levels. A single pesticide, dieldrin, was detected in a surface soil sample above the residential and commercial screening levels. All metals were below residential RGL screening levels except for some total chromium detections that slightly exceeded the residential screening level (maximum detection 220 mg/kg). These results, however, are consistent with background soil conditions and there is no indication these detections were associated with a historic release.

The relevant figures and tables from Terracon's recent assessment are attached (Appendix D).

Terracon also completed geotechnical investigations on the Property in May 2024 and October 2025. Five test pits and four geotechnical borings were advanced across the Property in May 2024, and 20 geotechnical borings were advanced across the Property in October 2025. No evidence of waste or historic landfilling material was detected in any of the geotechnical or environmental test pits or borings on the Property.

### **Conclusion**

As summarized above, there has been extensive assessment and remediation of the Property. The Army completed initial assessment and remediation before finding all required remedial activities were complete and the Property could be transferred to non-federal ownership. The Army also completed an analysis of surface water and sediment on the Property and found limited exceedances of contaminants. These exceedances, however, were found at the most upstream sample location as the stream entered the Property and therefore reflected offsite impacts coming onto the Property. There were no

exceedances downstream of this sample location. Additional assessment has been completed as part of the Brownfields Program, which found one detection of a pesticide in surface soil that needs to be addressed. This exceedance will be delineated and excavated prior to the start of construction activities at the Property through the Brownfields Program. Proper stormwater and erosion controls will be implemented to ensure impacts to surface water during construction are minimized.

#### **4.2 Current Site Conditions**

The site in present day is undeveloped and comprised of a mixed early to mid-successional pine-hardwood forest with a moderate density of vegetative understory. The project site receives significant stormwater runoff from the surrounding commercial and industrial development and stormwater detention basins located off-site.

Soils on the project site are mapped by the U.S. Department of Agriculture, Natural Resource Conservation Service (NRCS) as Ashlar sandy loam, very rocky (AtE), Cartecay loam (CA), Cecil sandy loam (CeB), Pacolet sandy loam (PaC and PaE), and Urban Land (UD) (Figure 4). CA is considered to be a potential hydric soil.

The aquatic resources on the site were delineated by Corblu on February 22 and 23, 2024. Based on the results of the delineation, the extent of aquatic resources on the site are comprised of three (3) intermittent streams (I1-I3), one (1) perennial stream (P1), and three (3) wetlands (W1-W3) (Figure 2, Photograph Nos. 1-14). All identified streams are considered Relatively Permanent Waters (RPW) and are tributaries to Conley Creek, which is located approximately 2.17 miles down-gradient (i.e., north) of the project site. Site waters drain to Conley Creek via an off-site unnamed tributary. Conley Creek is 303(d) listed stream as “not supporting” its designated use by Georgia Environmental Protection Division (EPD) under Section 303(d) of the Federal Water Pollution Control Act Amendment of 1972 [3 U.S.C. Section 1313(d)] due to Bio F (i.e., fecal coliform bacteria) from urban runoff (UR). The TDML for Bacteria was completed in 2002 (revised in 2007) (Bacteria Indicator Supplement 2022).

#### **5. Project Schedule Dates**

Construction of the project will start after the Clean Water Act (CWA) Section 404 and 401 WQC, and the EPD stream buffer variance and local permits are obtained. Project start is estimated to be August 2026 with a May 2028 targeted completion.

**6. List of all other Federal, State and Local Agency Authorizations Required for the Proposed Activity and the Current Status of Each Authorization**

USACE CWA Section 404 permit submitted January 23, 2026.

EPD Stream Buffer Variance will be submitted in the next few weeks.

City of Forest Park Erosion and Sedimentation Plan and corresponding Land Disturbance Permit; to be submitted upon finalization of the erosion and sedimentation plan and submitted by the project engineer.

City of Forest Park Zoning; the project site is appropriately zoned for industrial use, which supports data center development.

**7. Pre-Filing Meeting**

A pre-filing meeting with the applicant/agent was requested on November 11, 2025, and completed with EPD of November 25, 2025 (Appendix E).

Please contact me at (770) 591-9990 if you have questions or require any additional information regarding this request for 401 WQC.

Sincerely,

CORBLU ECOLOGY GROUP, LLC



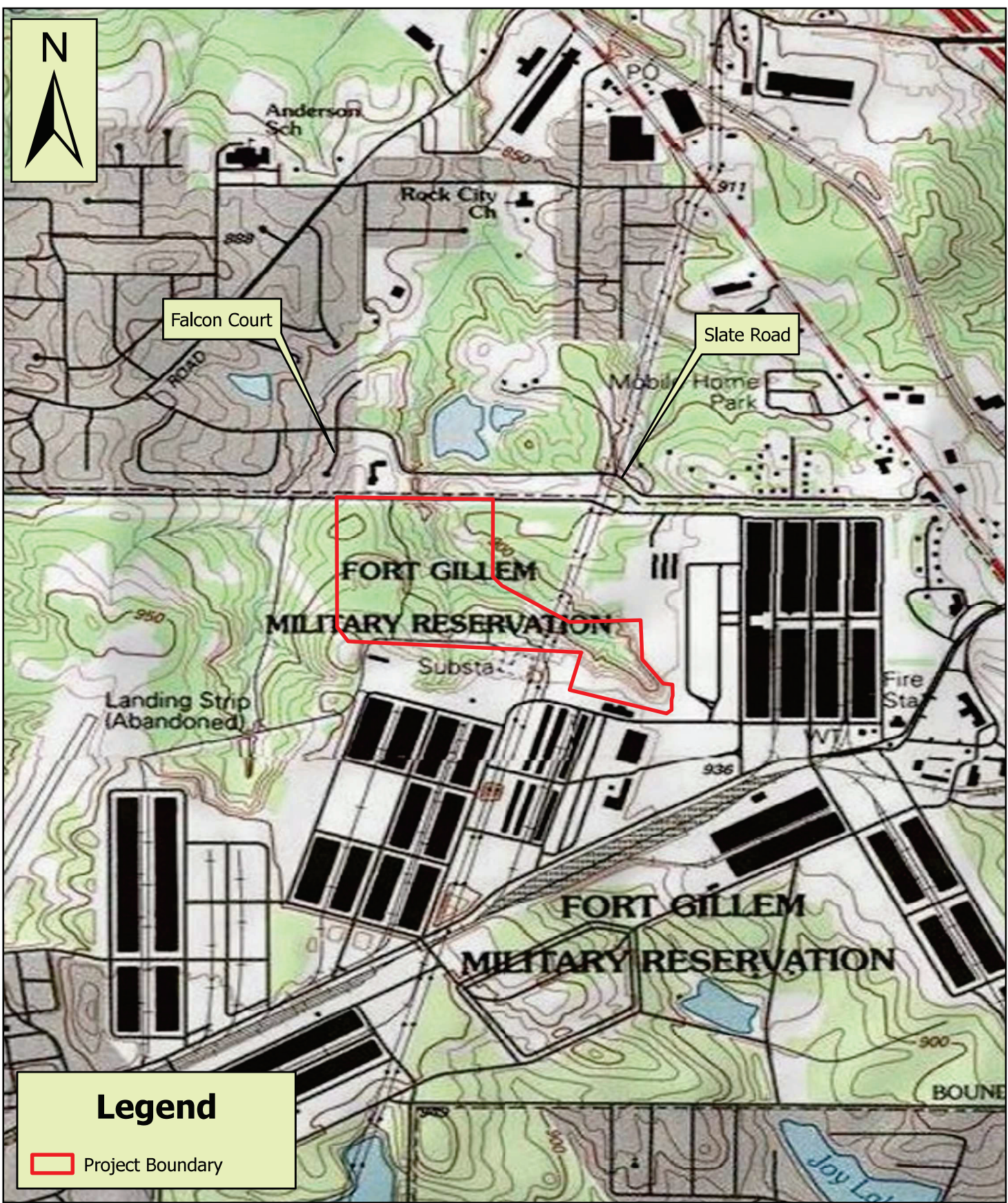
Michael A. Barfield, CWB, CE  
Senior Ecologist



Richard W. Whiteside, PhD, CWB, CSE  
President

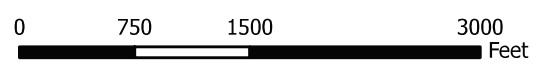
Attachments: Figure 1 – Site Location Map  
Figure 2 – Aquatic Resources  
Figure 3 – Aquatic Resources Impact Map  
Figure 4 – Site Soils Map  
Photograph Nos. 1 – 14  
Appendix A: USACE 404 Individual Permit Application  
Appendix B: Ft. Gillem Data Center Site Plan  
Appendix C: U.S. Army Surface Water and Sediment Sample Figures and Tables  
Appendix D: Terracon Sampling Figure and Tables  
Appendix E: Pre-filing Meeting Request Email

c: Mr. Dominic Reinecker, via email



Base Map Source: USA Topo Maps

1:15,000



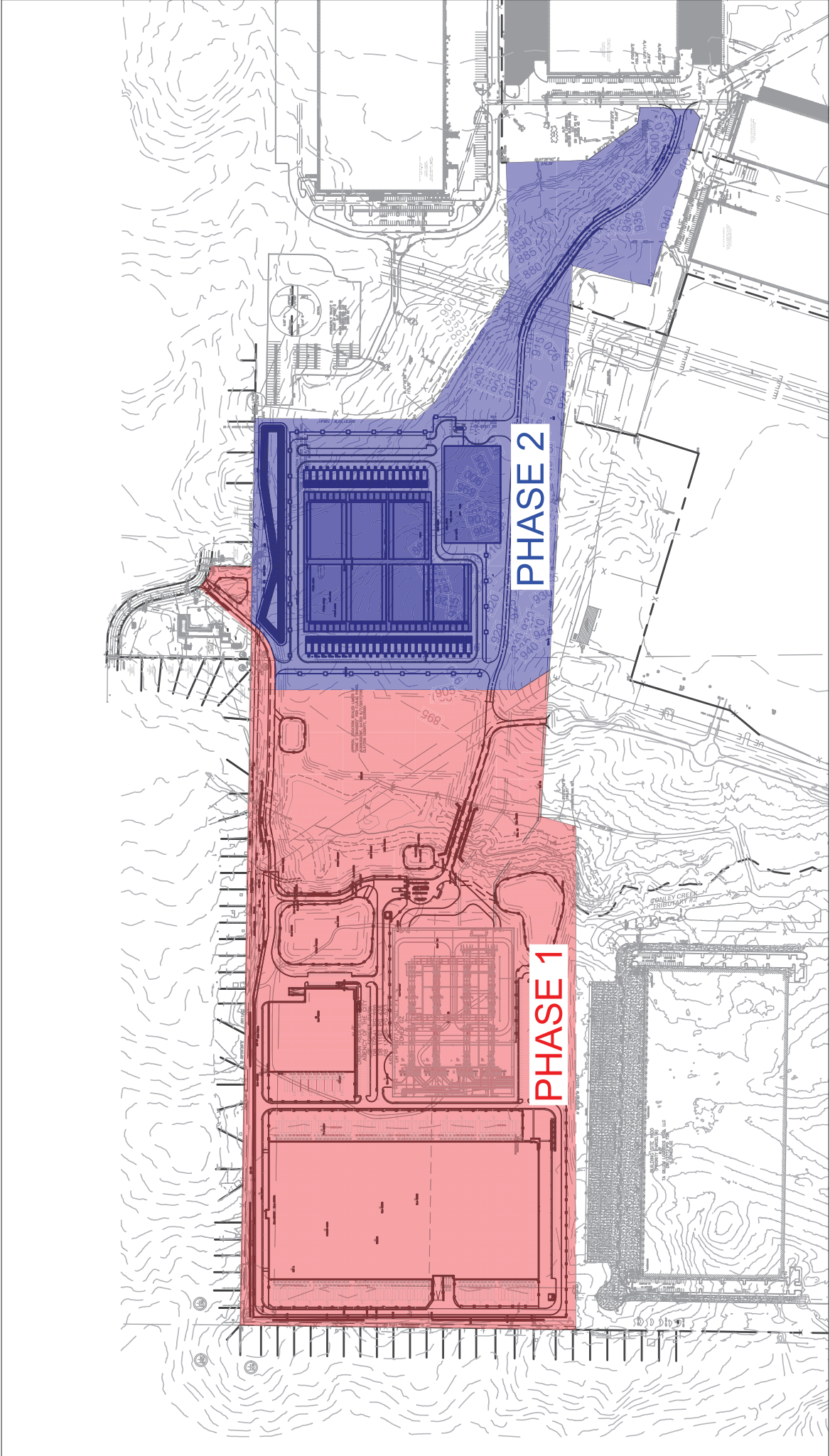
**Legend**

Project Boundary

GA Forest Park Land LLC  
 Ft. Gillem Data Center  
 Clayton County, Georgia



**Figure 1**  
 Site Location Map  
 Project No. 02-060225



**GILLEM**  
 MASTER SITE PLAN

April 13, 2026