

Regional Review Finding Development of Regional Impact

DATE: March 30, 2025

TO: Mayor Khalid Kamau, *City of South Fulton*

ATTN TO: Reginald McClendon, Community Development Managing Director, City of South Fulton

FROM: Mike Alexander, COO, Atlanta Regional Commission

RE: Development of Regional Impact (DRI) Review

ARC has completed a regional review of the below DRI. ARC reviewed the project's relationship to regional plans, goals and policies as well as impacts the project may have on the activities, plans, goals and policies of other local jurisdictions and state, federal and other agencies. This Final Report does not address whether the DRI is or is not in the best interest of the host local government.

Name of Proposal: Stonewall Tell Data Center DRI 4342 Submitting Local Government: City of South Fulton

Date Opened: March 14, 2025 Date Closed: March 30, 2025

Description: A DRI review of a proposal to construct a data center with a total of 1,902,000 SF of space in three buildings along with an electrical substation and supporting facilities on a 59-acre currently wooded site on Stonewall Tell Road south of South Fulton Parkway in the City of South Fulton in Fulton County.

Comments:

Key Comments

The project is not aligned with the applicable Developing Suburbs policy recommendations which state "There is a need in these areas for additional preservation of critical environmental locations and resources, as well as agricultural and forest uses."

The project could be somewhat better aligned with Developing Suburbs policies through the retention natural wooded area of the site and the allocation of some of the estimated \$55 to \$70 million in local City of South Fulton annual revenue generated toward natural area conservation and acquisition elsewhere in the City.

The project will require clearing of much of the forested portion of the site which will exacerbate local and regional heat island and stormwater impacts. It is recommended that the number of trees removed be replaced by trees planted elsewhere on the site or in the City of South Fulton.

ARC recommends a careful examination by Atlanta Watershed Management of its capacity to meet peak-day demands for this project, in addition to other current and projected future peak-day demands. The project's stated use of advanced "waterless" cooling technologies or "near waterless" technology to reduce water consumption is supportive of regional water policies.

The project will generate a total of 1,882 daily new vehicular trips.

General Comments

The Atlanta Region's Plan, developed by ARC in close coordination with partner local governments, is intended to broadly guide regional development in the 11-county metro region to ensure that required infrastructure and



resources are in place to support continued economic development and prosperity. The Plan assigns a relevant growth management category designation with accompanying policy recommendations to all areas in the region. This DRI site is designated Developing Suburbs; associated policy recommendations are provided at the end of these comments.

There are growing concerns about the impacts of high levels of energy and water consumption generated by the tremendous increase in the number of data center projects in the Atlanta region. ARC recommends a careful examination by Atlanta Watershed Management of its capacity to meet peak-day demands for this project, in addition to other current and projected future peak-day demands. ARC also recommends the 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.

Transportation and Mobility Comments

ARC Transportation and Mobility comments are attached. The project will generate a total of 1,882 daily new vehicular trips.

The proposal is largely consistent with ARC's MTP. Project connectivity with adjacent Regional Thoroughfares and Regional Truck Routes has been properly addressed. Bike and pedestrian conditions could be improved, but connections are made to some existing transit, and crosswalks are used throughout the site. Consider adding a crosswalk at Driveway A for possible future sidewalk improvements along Stonewall Tell Rd.

Environmental impact should be reduced and mitigated as much as possible. The amount of impermeable surface should be reduced when feasible, and tree shade should be added near pedestrian locations to improve pedestrian conditions on the site. Pedestrian connections should be improved between the site and Roosevelt Hwy.

Care should be taken to ensure that the constructed development provides an interconnected, functional, clearly marked and comfortable pedestrian experience on all driveways, paths, entrances, and parking areas. To the maximum extent possible, new driveways and intersection corners where pedestrians will cross should be constructed with minimal curb radii to reduce speeds of turning vehicles and decrease crossing distances for pedestrians.

ARC Natural Resources Comments

ARC's Natural Resources Group comments are attached.

Drought Management Planning

ARC recommends that Atlanta Watershed Management review its existing Drought Management Plan and update as needed to account for the prioritized water management requirements of data centers. Having a planned and organized drought response may help delay or avoid the need to implement more stringent water use restrictions and avoid harmful economic hardships.

Additional Water Resources Comments

While ARC and the Metropolitan North Georgia Water Planning District have no regulatory or review authority over this project, the Natural Resources Department has identified County and State regulations that could apply to this property. Other regulations may also apply that we have not identified. Watershed Protection



The project property is located in the portion of the Chattahoochee River watershed drains into the Chattahoochee River Corridor, but it is not within the 2000-foot Chattahoochee River Corridor and is not subject to the requirements of the Metropolitan River Protection Act or the Chattahoochee Corridor Plan. This portion of the watershed drains into the Chattahoochee downstream of the existing public water supply intakes on the Chattahoochee. Proposed intakes in South Fulton and Coweta County include this portion of the Chattahoochee River watershed as a large water supply watershed (over 100 square miles), as defined under the Part 5 Criteria of the 1989 Georgia Planning Act. However, for large water supply watersheds without a water supply reservoir, the only applicable Part 5 requirements are restrictions on hazardous waste handling, storage and disposal within seven miles upstream of a public water supply intake. This property is more than seven miles upstream of the nearest proposed public water supply intake on the Chattahoochee.

Stream Buffers

Both the project site plan and the USGS coverage for the project area show Wolf Creek, a tributary to Camp Creek, as well as three Wolf Creek tributaries, on the project property. Wolf Creek runs roughly south to north on the eastern edge of the project property, and one tributary runs southwest to northeast before its confluence with Wolf Creek in the southeastern portion of the property. A second tributary is located between Wolf Creek and the property boundary at Mason Road. The third tributary starts in the northwestern corner of the property and joins Wolf Creek north of the project property. The site plan shows and identifies the 25-foot State Sediment and Erosion Control Buffer as well as the City 75-foot undisturbed buffer and additional 25-foot along all the mapped tributaries. An access drive to Mason Road crosses Wolf Creek, but transportation access is allowed under the City stream buffer ordinance. However, the site plan also shows a small portion of a retaining wall intruding into the 100-foot setback on Wolf Creek, and other retaining walls, as well as drives and a detention pond, are close to the setback. Any intrusions may require variances and mitigation from the appropriate agencies. Any unmapped streams on the property may also be subject to the City buffer requirements. Any unmapped State waters identified on the property may also be subject to the State 25-foot Sediment and Erosion Control buffer.

Floodplain

The site plan shows the limits of what it identifies as "Shaded Zone X Floodplain" along Wolf Creek and its tributaries. The floodplain area delineated on the site plan is generally consistent with the current online FEMA floodplain map, which also shows the floodplain area as Flood Zone X, which FEMA defines as either the 500year floodplain (0.2% annual flood chance hazard), or areas of 1% annual chance flood {100-year floodplain} with average depth less than one foot or with drainage areas of less than one square mile. The FEMA coverage shows some floodplain on the tributary in the northwest corner of the property that is not shown on the site plan, but no development is shown on that portion of the project property. One access drive to Mason Road crosses the mapped Wolf Creek floodplain, and a retaining wall near the proposed Data Centers B and C and near a proposed detention pond are close to the edge of the floodplain. A The access drive and any other development within Zone X will need to meet all applicable requirements under the City's floodplain and future floodplain ordinances.

Other Environmental Comments

The project will require clearing of much of the forested portion of the site which will exacerbate local and regional heat island and stormwater impacts. It is recommended that the number of trees removed be replaced by trees planted elsewhere on the site or in the City of South Fulton.

The Atlanta Region's Plan strongly encourages the use of green infrastructure and/or low-impact design, e.g., pervious pavers, rain gardens, vegetated swales, etc., in parking areas and site driveways, and as part of any improvements to site frontages.



Atlanta Region's Plan Growth Policy Considerations: Developing Suburbs

The Atlanta Region's Plan identifies Developing Suburbs as areas in the region where suburban development has occurred, and the conventional development pattern is present but not set. These areas are characterized by residential development with pockets of commercial and industrial development. These areas represent the extent of the urban service area. There is a need in these areas for additional preservation of critical environmental locations and resources, as well as agricultural and forest uses. Limited existing infrastructure in these areas will constrain the amount of additional growth that is possible. Transportation improvements are needed within these Developing Suburbs, but care should be taken not to spur unwanted growth.

The project is not aligned with Developing Suburbs policy recommendations which state "There is a need in these areas for additional preservation of critical environmental locations and resources, as well as agricultural and forest uses." It could be better aligned with these policies through the retention of more of the existing forested portion of the site, and the allocation of some of the estimated annual \$55 to \$70 million in City of South Fulton revenue generated to support conservation land acquisition and tree planting elsewhere in the City. City of South Fulton leadership and staff, along with the applicant team, should collaborate closely to ensure optimal sensitivity to the needs of nearby local governments, neighborhoods, and natural systems.

The following local governments and agencies received notice of this review:

Atlanta Regional Commission Georgia Department of Natural Resource Georgia Env. Facilities

Authority

Georgia Department of Community Affairs Georgia Department of

Transportation Georgia Regional Transportation Authority

Georgia Soil and Water Conservation Commission City of Union City **MARTA**

For questions, please contact Donald Shockey at (470) 378-1531 or dshockey@atlantaregional.org.

This finding will be published to the ARC review website located at http://atlantaregional.org/plan-reviews.





Developments of Regional Impact

DRI Home Tier Map Apply View Submissions Login

DRI #4342 DEVELOPMENT OF REGIONAL IMPACT Initial DRI Information This form is to be completed by the city or county government to provide basic project information that will allow the RDC to determine if the project appears to meet or exceed applicable DRI thresholds. Refer to both the Rules for the DRI Process and the DRI Tiers and Thresholds for more information. **Local Government Information** Submitting Local Government: South Fulton Individual completing form: Reginald McClendon Telephone: 4708097236 E-mail: reginald.mcclendon@cityofsouthfultonga.gov *Note: The local government representative completing this form is responsible for the accuracy of the information contained herein. If a project is to be located in more than one jurisdiction and, in total, the project meets or exceeds a DRI threshold, the local government in which the largest portion of the project is to be located is responsible for initiating the DRI review process. **Proposed Project Information** Name of Proposed Project: Stonewall Tell Data Center Location (Street Address, Lat: 33.615125, Long: -84.552224 South of South Fulton Parkway and east of Stonewall GPS Coordinates, or Legal Tell Road Land Lot Description): Brief Description of Project: New 1,902,000-square-foot data center development. **Development Type:** (not selected) Hotels Wastewater Treatment Facilities Office Mixed Use Petroleum Storage Facilities Commercial Airports Water Supply Intakes/Reservoirs Wholesale & Distribution OAttractions & Recreational Facilities OIntermodal Terminals Hospitals and Health Care Facilities Post-Secondary Schools Truck Stops Housing Waste Handling Facilities Any other development types Industrial Quarries, Asphalt & Cement Plants If other development type, describe: Project Size (# of units, floor 1,902,000 SF of data center use on approximately 59 acres. Developer: RSC Investment Management LLC Mailing Address: 3490 Piedmont Road Suite 650 Address 2: City:Atlanta State: GA Zip:30305 Telephone: 404-276-9471 Email: sconway@rscinv.com Is property owner different (not selected) Yes No from developer/applicant? If ves, property owner: Is the proposed project (not selected) Yes No

entirely located within your

local government's jurisdiction?		
If no, in what additional jurisdictions is the project located?	Union City	
Is the current proposal a continuation or expansion of a previous DRI?	(not selected) Yes No	
If yes, provide the following information:	Project Name: Project ID:	
The initial action being requested of the local government for this project:	Sewer	
Is this project a phase or part of a larger overall project?	(not selected) Yes No	
If yes, what percent of the overall project does this project/phase represent?		
	This project/phase: 2033 Overall project: 2033	
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DRI Site Map | Contact



Developments of Regional Impact

DRI Home

Tier Map

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DRI #4342

Wetlands will be impacted via a Nationwide Permit 39. If floodplains are impacted, compensation and flood studies will be provided to ensure a no-rise off the property.

DEVELOPMENT OF REGIONAL IMPACT Additional DRI Information

This form is to be completed by the city or county government to provide information needed by the RDC for its review of the proposed DRI. Refer to both the Rules for the DRI Process and the DRI Tiers and Thresholds for more

Local Government Information

Submitting Local Government:

South Fulton

Individual completing form: Reginald McClendon

Telephone: 4708097236

Email: reginald.mcclendon@cityofsouthfultonga.gov

Project Information

Name of Proposed Project: Stonewall Tell Data Center

DRI ID Number: 4342

Developer/Applicant: RSC Investment Management LLC

Telephone: 404-276-9471 Email(s): sconway@rscinv.com

Additional Information Requested

Has the RDC identified any additional information required in order to proceed

with the official regional (not selected) Yes No review process? (If no,

proceed to Economic

Impacts.)

If yes, has that additional information been provided to your RDC and, if

(not selected) Yes No

applicable, GRTA?

If no, the official review process can not start until this additional information is provided.

Economic Development

Estimated Value at Build-

\$1.902B

Estimated annual local tax revenues (i.e., property tax, sales tax) likely to be generated by the proposed

\$55.3M - \$70.3M

development:

Is the regional work force sufficient to fill the demand created by the proposed

(not selected) Yes No

project?

Will this development displace any existing uses?

(not selected) Yes No

If yes, please describe (including number of units, square feet, etc): Existing 1,442 square-foot daycare on northwest parcel (ID: 09F270301230714, Address: 5120 Stonewall Tell Rd.

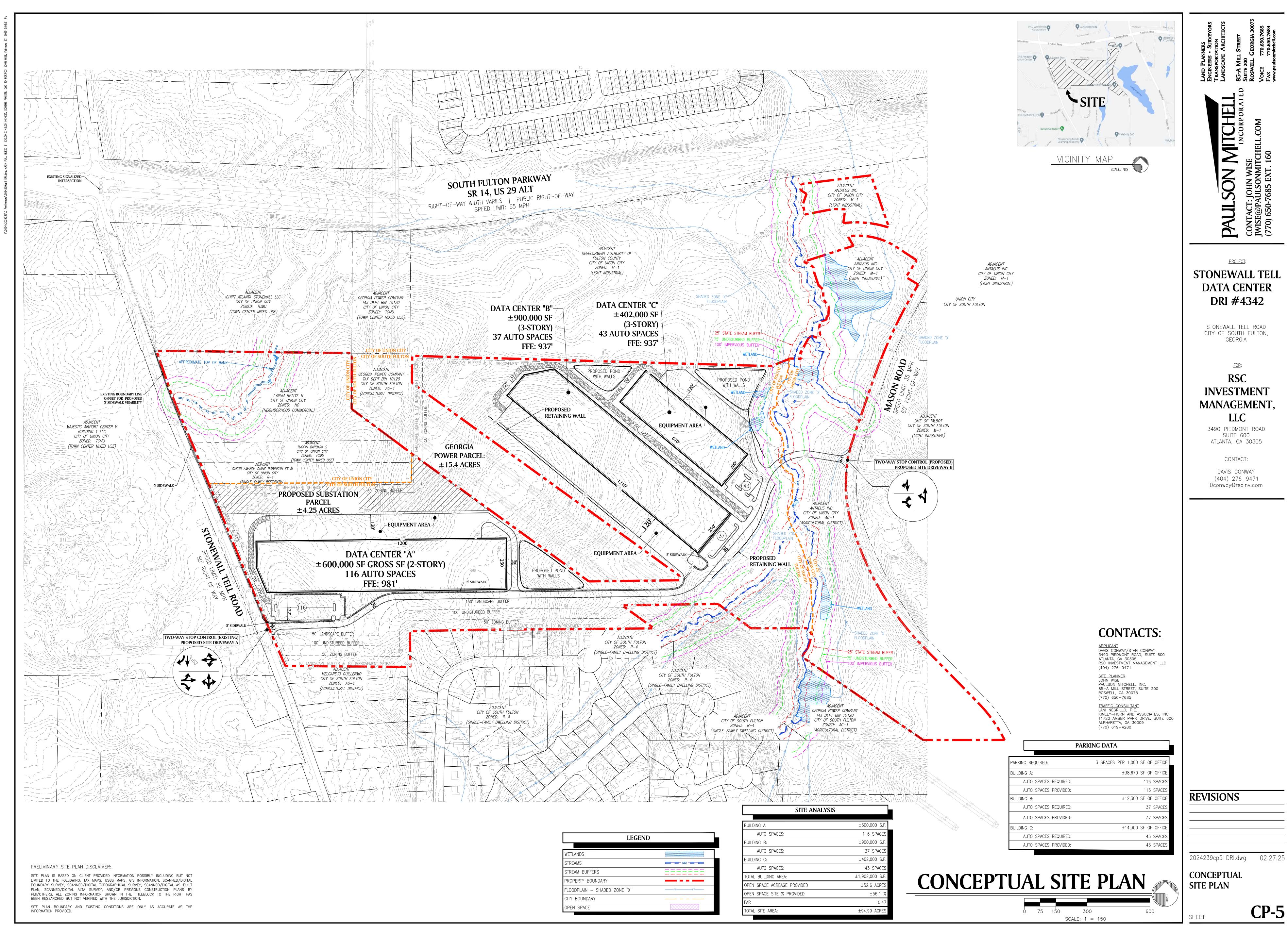
Water Supply				
Name of water supply provider for this site:	City of Atlanta			
What is the estimated water supply demand to be generated by the project, measured in Millions of Gallons Per Day (MGD)?	0.030 MGD			
Is sufficient water supply capacity available to serve the proposed project?	(not selected) Yes No			
If no, describe any plans to e	expand the existing water supply capacity:			
Is a water line extension required to serve this project?	(not selected) Yes No			
If yes, how much additional	line (in miles) will be required?			
Wastewater Disposal				
Name of wastewater treatment provider for this site:	Fulton County			
What is the estimated sewage flow to be generated by the project, measured in Millions of Gallons Per Day (MGD)?	0.025 MGD			
Is sufficient wastewater treatment capacity available to serve this proposed project?	(not selected) Yes No			
If no, describe any plans to e	expand existing wastewater treatment capacity:			
Is a sewer line extension required to serve this project?	(not selected) Yes No			
If yes, how much additional I	ine (in miles) will be required?			
Land Transportation				
11				
How much traffic volume is expected to be generated by the proposed development, in peak hour vehicle trips per day? (If only an alternative measure of volume is available, please provide.)	1,882 Daily Trips, 242 AM Peak Hour Trips, and 204 PM Peak Hour Trips			
Has a traffic study been performed to determine				
whether or not transportation or access improvements will be needed to serve this project?	(not selected) Yes No			
Are transportation improvements needed to serve this project?	(not selected) Yes No			
If yes, please describe below:Please see traffic study prepared by Kimley-Horn				
Solid Waste Disposal				
How much solid waste is the project expected to generate annually (in tons)?	1,000 tons			
Is sufficient landfill capacity available to serve this proposed project?	(not selected) Yes No			
If no, describe any plans to expand existing landfill capacity:				
Will any hazardous waste be generated by the development?	(not selected) Yes No			
If yes, please explain:				

Stormwater Management

What percentage of the site is projected to be impervious surface once the +/- 44.6% proposed development has been constructed?					
Describe any measures proposed (such as buffers, detention or retention ponds, pervious parking areas) to mitigate the project's impacts on stormwater management. Wet extended detention ponds will be utilized throughout site for stormwater management to handle site's water quality, detention, and channel protection requirements.					
Environmental Quality					
Is the development located within, or likely to affect any of the following:					
Water supply watersheds?	(not selected) Yes No				
2. Significant groundwater recharge areas?	(not selected) Yes No				
3. Wetlands?	(not selected) Yes No				
4. Protected mountains?	(not selected) Yes No				
5. Protected river corridors?	(not selected) Yes No				
6. Floodplains?	(not selected) Yes No				
7. Historic resources?	(not selected) Yes No				
8. Other environmentally sensitive resources?	(not selected) Yes No				
If you answered yes to any question above, describe how the identified resource(s) may be affected:					
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DRI Site Map | Contact



STONEWALL TELL **DATA CENTER**

STONEWALL TELL ROAD CITY OF SOUTH FULTON, GEORGIA

MANAGEMENT,

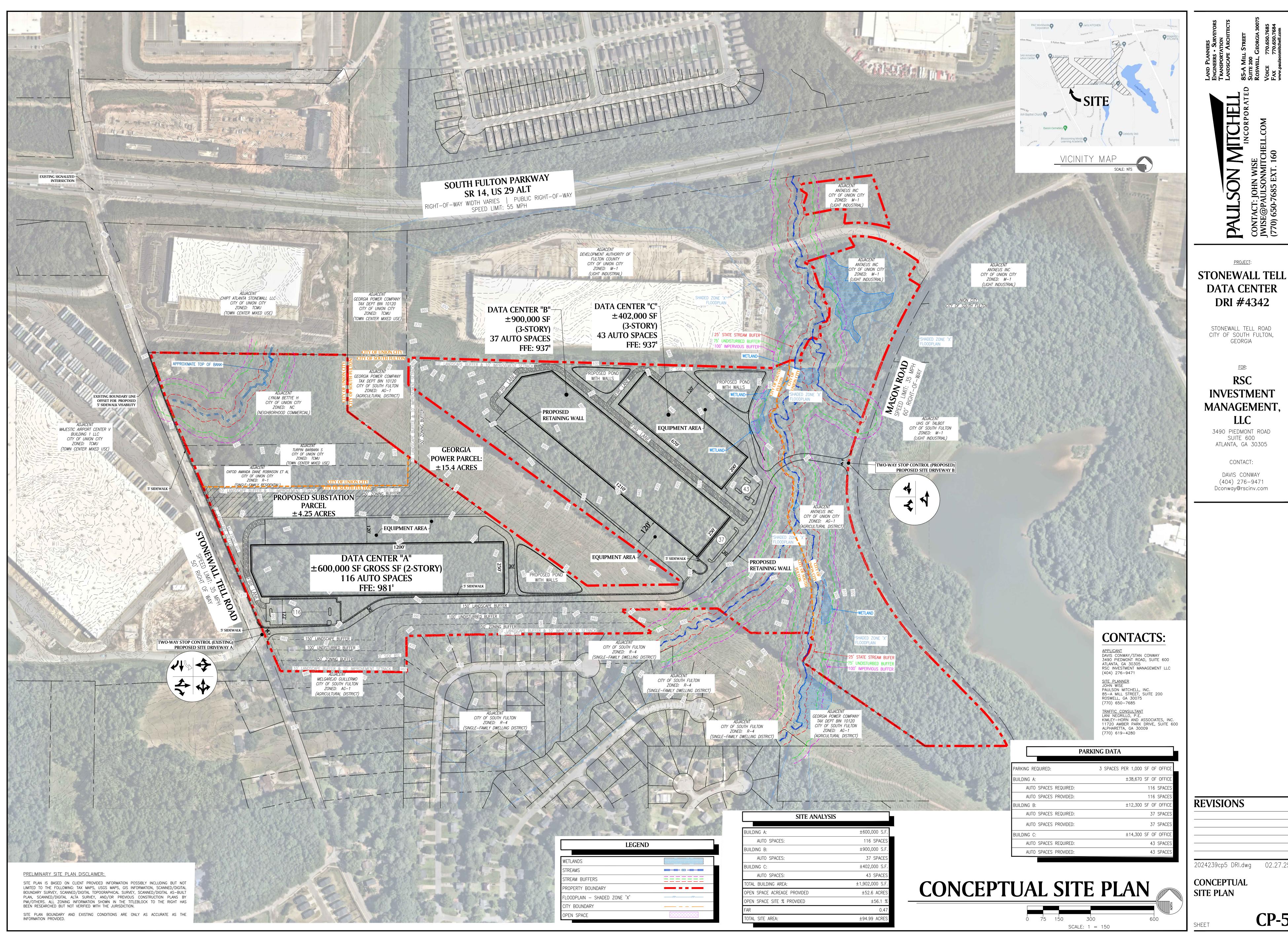
3490 PIEDMONT ROAD SUITE 600 ATLANTA, GA 30305

CONTACT:

DAVIS CONWAY (404) 276-9471 Dconway@rscinv.com

CONCEPTUAL

CP-5



CP-5

STONEWALL TELL DATA CENTER DRI

City of South Fulton Natural Resources Review Comments March 25, 2025

ARC recognizes that energy demands will be very high for this project and that related water needs for cooling purposes may create a large peak demand from the City of Atlanta Department of Watershed Management (Atlanta Watershed Management). The application proposes 0.030 MGD of water supply demand and 0.025 MGD of estimated sewage flow generated by the project. It is unclear if these figures represent an annual average or daily maximum flow need. Given that daily maximum flow requirements for cooling purposes often occur during the hottest days of the year, the demand for water has a higher likelihood of occurring during times of water stress in the water supply watershed.

The water resources of the metro Atlanta region are critically important to the region's economic vitality and quality of life. The region lies in the headwaters of six major river basins, where natural surface water sources are small relative to other major metropolitan areas and in need of a high level of protection. The firm yield of water supply sources available to individual jurisdictions also varies, and some jurisdictions have larger available supplies than others. ARC recommends a careful examination by Atlanta Watershed Management of its capacity to meet peak-day demands for this project, in addition to other current and projected future peak-day demands. ARC also recommends that Atlanta Watershed Management require the 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.

Drought Management Planning

ARC recommends that Atlanta Watershed Management review its existing Drought Management Plan and update as needed to account for the prioritized water management requirements of data centers. Having a planned and organized drought response may help delay or avoid the need to implement more stringent water use restrictions and avoid harmful economic hardships.

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STONEWALL TELL DATA CENTER DRI ARC Natural Resources Comments Page Two March 25, 2025

Stream Buffers

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Any unmapped streams on the property may also be subject to the City buffer requirements. Any unmapped State waters identified on the property may also be subject to the State 25-foot Sediment and Erosion Control buffer.

Floodplain

The site plan shows the limits of what it identifies as "Shaded Zone X Floodplain" along Wolf Creek and its tributaries. The floodplain area delineated on the site plan is generally consistent with the current online FEMA floodplain map, which also shows the floodplain area as Flood Zone X, which FEMA defines as either the 500-year floodplain (0.2% annual flood chance hazard), or areas of 1% annual chance flood {100-year floodplain} with average depth less than one foot or with drainage areas of less than one square mile. The FEMA coverage shows some floodplain on the tributary in the northwest corner of the property that is not shown on the site plan, but no development is shown on that portion of the project property. One access drive to Mason Road crosses the mapped Wolf Creek floodplain, and a retaining wall near the proposed Data Centers B and C and near a proposed detention pond are close to the edge of the floodplain. A The access drive and any other development within Zone X will need to meet all applicable requirements under the City's floodplain and future floodplain ordinances.

Stormwater/Water Quality

The project should adequately address the impacts of the proposed development on stormwater runoff and downstream water quality.

During the planning phase, the stormwater management system (system) should meet the requirements of the local jurisdiction's post-construction stormwater management ordinance. The system should be designed to prevent increased flood damage, streambank channel erosion, habitat degradation and water quality degradation, and enhance and promote the public health, safety and general welfare. The system design should also be in accordance with the applicable sections of the Georgia Stormwater Management Manual (www.georgiastormwater.com) such as design standards, calculations, formulas, methods, and runoff reduction practices sized and designed to retain the first 1.0 inch of rainfall on the site to the maximum extent practicable.

STONEWALL TELL DATA CENTER DRI ARC Natural Resources Comments Page Three March 25, 2025

Where possible, the project should use stormwater better site design practices included in the Georgia Stormwater Management Manual, Volume 2, Section 2.3. Better site design for stormwater management includes several site design techniques such as preserving natural features and resources, effectively laying out the site elements to reduce impact, reducing the amount of impervious surfaces, and using natural features on the site for stormwater management. The aim is to reduce the environmental impact "footprint" of the site while retaining and enhancing the owner/developer's purpose and vision for the site.

During construction, the project should conform to the relevant state and federal erosion and sedimentation control requirements.

VANTAGE DATA CENTER - WESTLAKE DRI ARC Natural Resources Comments Page Three February 10, 2025

Leverage Partnerships for Sustainability Opportunities

Given the large energy footprint required by data centers, ARC recommends the City of South Fulton foster a partnership with data center developers and operators to support sustainable practices both on and offsite. Recognition and agreement on the incorporation of these practices can help to reduce or offset potential environmental impacts such as water demands, energy needs, stormwater quality/flooding, noise, and air quality.

Transmission Lines and Easement Needs

The high energy demands of data centers often require significant investments in power related infrastructure. The City of South Fulton should work with the data center developer to understand what, if any, upgrades to power transmission infrastructure and necessary easements would be needed to support the initial and future power needs of the development.

Encourage Research and Innovation

ARC encourages the City of South Fulton to inquire what, if any, research and development opportunities will be considered by the data center developer to advance improvements in energy and water efficiency which can alleviate strain on local resources.



regional impact + local relevance

Development of Regional Impact

Assessment of Consistency with the ARC Metropolitan Transportation Plan

Prepared by: Shelby Stamback, ARC Transportation Access and Mobility Division March 17, 2025

DRI INFORMATION

Stonewall Tell Data Center DRI 4342 - City of South Fulton, Fulton County, Georgia

Metropolitan Transportation Plan Projects

bicycling accessibility conditions

Did the transportation analysis incorporate all current MTP projects contained in the study area or along major transportation corridors connecting the study area with adjacent jurisdictions?

Yes, the transportation analysis incorporated all current MTP projects in the study area.

REG

<u> </u>	NAL NETWORKS
1.	Will the project be directly served by any roadways identified as Regional Thoroughfares? Any access points between the development and a Regional Thoroughfare, combined with the development's on-site circulation patterns, must be designed with the goal of preserving the highest possible level of capacity and safety for all users of the roadway.
	NO ☐ YES
2.	Will the development site be directly served by any roadways identified as Regional Truck Routes? Any access points between the development and a Regional Truck Route, combined with the development's on-site circulation patterns, must be designed with the goal of preserving the highest possible level of capacity and safety for all users of the roadway
	NO ☐ YES
3.	If the development site is within one mile of an existing or planned rail service, provide information on accessibility conditions and transit supportive uses.
	NOT APPLICABLE ■
	RAIL SERVICE WITHIN ONE MILE
	Rail TOD Comments - N/A
4.	If project is within one mile of existing or planned fixed route bus services (including any privately operated shuttles or circulators open to the general public), provide information on walking and

	■ NOT APPLICABLE		
	MARTA Route 82		
	Distance* .6 miles		
	Walking Access to stops*	Stop closest to Stonewall Tell Rd is walkable with proposed sidewalks.	
	Bicycling Access to stops *	Stop is not bikeable.	
	MARTA Route 180		
	Distance* 1 mile		
	Walking Access to stops*	Stop is not walkable.	
	Bicycling Access to stops *	Stop is not bikeable.	
	BRT TOD Comments -		
	•	which does not generally support transit ridership. The proposed site newall Tell Rd, but sidewalks are not connected to Roosevelt Hwy and	
5.	If the development site is wit information on accessibility c	hin one mile of an existing or planned multi-use path or trail, provide onditions	
	NOT APPLICABLE		
	YES		
ОТНЕ	R TRANSPORTATION DESIGN	CONSIDERATIONS	
		the construction of publicly accessible local road or drive aisle	
		an connections, with adjacent parcels?	
	Connections with adjacent parcels are made where feasible.		
2.	Does the site plan enable ped development site safely and of	lestrians and bicyclists to move between destinations within the conveniently?	
	•	provements on site. Sidewalks allow pedestrians to safely move from the her site locations. There are no bike improvements.	
3.	Does the site plan effectively	manage truck movements and separate them, to the extent possible,	

from the flow of pedestrians, bicyclists and motorists both within the site and on the surrounding

The site will have a significant amount of truck traffic. This is not able to fully be separated from bike

road network?

and pedestrian movements but is mostly separated.

4. Does the site plan include provisions for electric vehicle charging? Yes.

RECOMMENDATIONS

1. Do the transportation network recommendations outlined in the transportation study adequately mitigate the project's vehicular impact?

The proposal is largely consistent with ARC's MTP. Project connectivity with adjacent Regional Thoroughfares and Regional Truck Routes has been properly addressed. Bike and pedestrian conditions could be improved, but connections are made to some existing transit, and crosswalks are used throughout the site. Consider adding a crosswalk at Driveway A for possible future sidewalk improvements along Stonewall Tell Rd.

2. ARC offers the following additional comments for consideration by the development team and/or the applicable local government(s):

Environmental impact should be reduced and mitigated as much as possible. The amount of impermeable surface should be reduced when feasible, and tree shade should be added near pedestrian locations to improve pedestrian conditions on the site. Pedestrian connections should be improved between the site and Roosevelt Hwy.