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May 2, 2016

Milton City Council
13000 Deerfield Parkway
Milton, Ga. 30004

Re: Parks and Recreation Impact Fee Increase

Members of the Milton City Council,

The Council for Quality Growth is a not-for-profit trade association comprised of a diverse membership of developers, contractors, engineers, architects, planners, law firms and bankers with a vested interest in quality growth and development in the Region and City of Milton. As the City Council considers an increase in the City's parks and recreations impact fees, the Council would like to offer comments and suggestions on the proposed fees.

The Council understands that impact fees are a viable and effective way for local governments to fund the expansion of government services needed as a community grows and, in principle, the Council and its members recognize and support the City's efforts. However we ask that the proposed increased fees be implemented in a way that does not create an un-mitigatable impact on projects and overall economic development, both residential and commercial, for the City's long-term economic viability.

The proposed fee increase is based on the Ross + Associates Impact Fee Report, which specifically states that the numbers presented are intended to "establish a ceiling," where the impact fees calculated are the Maximum Allowable fees by State law, not recommendations for reasonable fees based on development trends in the North Fulton Region.

GA State law allows for the reduction of one "Public Facility Category" impact fees (i.e. Parks and Recreation), without having to decrease the other categories' fees. Therefore, continuing the reduction of the proposed Parks and Recreation fees would not hinder the City's ability to collect fees for the Public Safety and Transportation components of the Capital Improvements Element.

According to the proposed Capital Improvements Element, Impact Fees are expected to pay for 306 acres of new park land, 45 acres and 38 miles of new trails, and 1,138 acres of conservation easements, as well as numerous public facilities. However, Impact Fee revenue CANNOT be used to fund the maintenance, operations or replacement of deteriorated facilities. How will the upkeep of these new public parks, trails and facilities be managed and funded?



Ross + Associates reported a substantial existing Level of Service shortfall for parks, trails and recreational facilities in the City. While only the "new growth demand" is used to calculate the impact fees, existing residents will use and benefit from the parks built with impact fee revenue without having paid impact fees themselves.


The Council for Quality Growth is concerned that the adoption of increased parks and recreation fee, which is an increase from the current \$3,100 to almost \$6,300 per dwelling unit, required per new family in Milton, where existing residents have never paid such high fees, may place a disproportionate cost burden of parks and infrastructure improvements on new residents. Additionally, at the previous City Council Meeting where the parks and recreation impact fee was discussed last fall, City Council members expressed concern over obligating the City to allocate the required funding to match impact fee revenue for the park improvements described in the Parks and Recreation Master Plan.

At \$7,700, Milton would have the highest combined residential Impact Fees in North Fulton and approaching the highest fees in the Atlanta Metro Region. Please see the attached regional Impact Fees Comparison Chart for your reference on Milton's fees versus surrounding cities and counties.

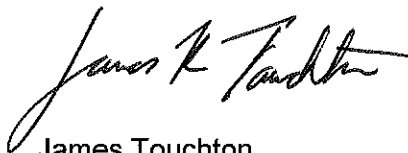
The Council recommends continuing a reduced Parks and Recreation Impact Fee that will allow the City to generate funding for park improvements, but does not place a disproportionate cost burden on residential developers and new residents.

The Council and its members look forward to continuing to work with you to adopt a fee schedule that is based on a clear need to fund new parks and recreation facilities and improvements needed as new developments are constructed. Please do not hesitate to call on us whenever we may be of service to you in this and any other matter. Thank you for your dedicated service.

Sincerely,



Michael E. Paris
President & CEO
Council for Quality Growth



James Touchton
Director, Policy & Government Affairs
Council for Quality Growth

Attachment: Regional Impact Fee Schedule Comparison Table

IMPACT FEES: REGIONAL COMPARISON

City	Impact Fees		
Forsyth County (Adopted 4/07/2016)	Parks and Rec Fee: SF Res: \$1015 per dwelling unit MF Res: \$645 per dwelling unit	Public Safety (+ Library) Fee: SF Res: \$658 per dwelling unit MF Res: \$418 per dwelling unit Comm.: \$532 per 1,000 sq. ft. Office: \$227 per 1,000 sq.ft.	Transportation Fee: SF Res: \$1,968 per dwelling unit MF Res: \$1,247 per dwelling unit Comm.: \$0. Office: \$0.
Milton (Adopted 10/5/15)	Parks and Rec Fee: SF Res: \$3,107.55 per dwelling unit Apartment: \$3,107.55 per dwelling unit Condo/TH: \$3,107.55 per dwelling unit (Only 50% of maximum collected)	Public Safety Fee: SF Res: \$638.43 per dwelling unit Apartment: \$638.43 per dwelling unit Condo/TH: \$638.43 per dwelling unit Comm.: ranges from \$100 to \$750 per 1,000 sq.ft. depending on retail class	Transportation Fee: SF Res: \$646.98 per dwelling unit Apartment: \$646.98 per dwelling unit Condo/TH: \$646.98 per dwelling unit Comm.: ranges from \$2400 to \$8700 per 1,000 sq.ft. depending on retail class
Alpharetta (Adopted 9/28/15)	Parks and Rec Fee: SF Res: \$5,157 per dwelling unit MF Res: \$5,157 per dwelling unit Comm. (<100K sq.ft.): \$94 per 1,000 sq.ft. Office: \$267 per 1,000 sq.ft.	Public Safety Fee: SF Res: \$138 per dwelling unit MF Res: \$138 per dwelling unit Comm. (<100K sq.ft.): \$251 per 1,000 sq.ft. Office: \$205 per 1,000 sq.ft.	Transportation Fee: SF Res: \$881 per dwelling unit MF Res: \$881 per dwelling unit Comm. (<100K sq.ft.): \$1,156 per 1,000 sq.ft. Office (<100K sq.ft.): \$267 per 1,000 sq.ft.
Sandy Springs (2008)	Parks and Rec Fee: \$165.00 per dwelling unit.	Public Safety Fee: Res: \$165.00 per dwelling unit. Comm.: \$433.00 per 1,000 sq.ft. Office: \$168.00 per 1,000 sq.ft.	Transportation Fee: SF Res: \$1316.45 per dwelling unit Apartment: \$924.40 per dwelling unit Condo/TH: \$806.10 per dwelling unit Comm.: ranges from \$2k to \$40K per 1,000 sq.ft. depending on retail class
Roswell (2015)	Parks and Rec Fee: Res up to 1,500 sq.ft.: \$318 to \$424 per dwelling Res 1,501 to 2,500 sq.ft.: \$501 to \$559 Res 2,501 to 4,000 sq.ft.: \$607 to \$682 Res 4,001 sq.ft. or more: \$713	Public Safety Fee: Res up to 1,500 sq.ft.: \$521 to \$695 per dwelling Res 1,501 to 2,500 sq.ft.: \$821 to \$916 Res 2,501 to 4,000 sq.ft.: \$995 to \$1,117 Res 4,001 sq.ft. or more: \$1,169 Comm.: \$260 per 1,000 sq.ft. Office: \$320 per 1,000 sq.ft.	Transportation Fee: Res up to 1,500 sq.ft.: \$964 to \$1,285 per dwelling Res 1,501 to 2,500 sq.ft.: \$1,514 to \$1,690 Res 2,501 to 4,000 sq.ft.: \$1,835 to \$2,064 Res 4,001 sq.ft. or more: \$2,159 Comm.: \$2,718 per 1,000 sq.ft.
Cherokee County (2013)	Parks and Rec Fee: \$283.74 per dwelling unit.	Public Safety (+ Library) Fee: SF Res: \$799.22 per dwelling unit MF Res: \$799.22 per dwelling unit Comm.: ranges from \$50 to \$500 per 1,000 sq.ft. depending on retail class	Transportation Fee: SF Res: \$59 per dwelling unit MF Res: \$41 per dwelling unit Comm.: ranges from \$25 to \$2100 per 1,000 sq.ft. depending on retail class **Only 10% of maximum allowable roads impact fee is collected
Hall County	Flat fee collected for all improvement categories: SF Residential: \$1,242 per dwelling unit MF Residential: \$1,242 per dwelling unit Commercial: Ranges from \$21 to \$564 per 1,000 sq.ft.		

Neighboring Communities with No Impact Fees:

- Dawson County
- Gwinnett County
- DeKalb County
- City of Johns Creek
- City of Suwanee
- City of Duluth