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COUNCIL for QUALITY GROWTH

October 28, 2025

Chairwoman Lisa Cupid and Board of Commissioners
Cobb County Government
100 Cherokee Street
Marietta, Georgia 30090

RE: Policy Recommendations Regarding Cobb County 2025 Code Amendment Package

Dear Chairwoman Cupid and Commissioners,

The Council for Quality Growth appreciates the opportunity to provide input on Cobb County's 2025 Code Amendment Package. As a regional not-for-profit organization with a mission to promote balanced and responsible development, the Council works closely with governments and stakeholders across metro Atlanta. In this capacity, we write to express our support for establishing a dedicated stormwater utility (*Sec. 122-301* through *122-316*) with a few proposed amendments to help ensure its success and, conversely, to express our opposition to the proposed new code language banning and restricting wastewater lift stations (*Sec. 122-126*). We also have included comments on other code amendment sections that warrant further discussion. We believe that thoughtful water policy that recognizes the county's growth and builds funding mechanisms will allow the county to sustain that growth in a smart manner. Please see below for our analysis and recommendations.

Chapter 122: Section 126 - *Lift Stations*

The Council for Quality Growth firmly opposes the draft *Sec. 122-126* provisions that would prohibit new public sewer lift stations and impose onerous hurdles for private lift stations in Cobb County. Such a blanket ban is unprecedented in our region and would undermine the County's ability to support growth by pushing development into neighboring counties that are more willing to extend sewer service, ultimately costing Cobb the opportunity for economic development.

- A ban of this type is out of line with our peer counties. Regional data compiled by the Council in June 2025 shows that peer counties successfully utilize lift stations in their sewer systems without any prohibition policy. Gwinnett, DeKalb, Cherokee, Forsyth, and Paulding County actively maintain extensive networks of pump/lift stations, ranging from dozens to hundreds of stations. Additionally, the Metropolitan North Georgia Water Planning District's 2022 Water Resources Management Plan focuses on ensuring pump station reliability and redundancy, not prohibiting new stations outright. Cobb County's proposed ban is therefore out of step with regional norms and would arbitrarily limit the toolbox available to Cobb Water's leadership to meet future sewer service needs.
- Rather than banning lift stations, other metro counties manage the maintenance burden of lift station through upfront fees and financial mechanisms. For example, both Gwinnett and DeKalb County imposes substantial fees on new private pump stations, including standard operation/maintenance charges, which disincentivizes unnecessary lift stations. These approaches ensure developers bear the cost of long-term upkeep without forbidding an otherwise useful infrastructure tool. Given MNGWPD's recommendation that aging pump stations be made resilient (Action Item WW-1 in the District plan), we believe the County's goal can be achieved through proper design and funding, not by eliminating lift stations entirely. Multiple metro Atlanta jurisdictions have demonstrated that responsibly funded lift stations can operate reliably when backed by developer contributions and maintenance agreements.

For the above reasons, we ask the Board of Commissioners to reject the proposed *Sec. 122-126* changes. Cobb County's new water & sewer leadership should have the full range of infrastructure tools at their disposal, including the use of lift stations. We urge Cobb County to follow the examples of neighboring jurisdictions and employ creative fiscal tools rather than an outright ban.

Chapter 122: Section 130 - *Sewer for New Developments*

The Council wishes to express concern that phrasing within this code amendment could enable the blockage of private developments or require developers to bear additional weights for delivering system improvements. When system improvements are being made, offsetting costs should be applied to the developer to ensure proportional investment based on needs. The Council is continuing to evaluate this particular code amendment and will provide additional recommendations as necessary.

Chapter 122: Section 301-316 - *Stormwater Utility*

The Council for Quality Growth strongly supports Cobb County's effort to create and transition to a dedicated stormwater utility which will provide a sustainable funding source for stormwater infrastructure and watershed management. This initiative will bring Cobb in line with many of its metro Atlanta peers that have already implemented stormwater utilities, ensuring that we proactively address flooding, stream maintenance, and regulatory compliance. 46 of the 87 local governments in the 11-county metro Atlanta region, including Gwinnett, DeKalb, Clayton, Douglas, Rockdale, and Henry counties, have a stormwater utility. We commend Cobb's proposed fee structure, recognizing that it is regionally consistent and fair, closely mirroring the frameworks used in neighboring counties both in costs and methodology. This parity gives us confidence that the new utility will be competitively structured and equitable for Cobb's residents and businesses.

- To ensure the successful implementation of the stormwater utility and to minimize any hardship during the transition, the Council recommends a few key adjustments and clarifications as the Board considers adoption. We urge the County to set the utility's effective start date to January 1, 2027. Pushing the launch to the beginning of 2027 will provide adequate time for Cobb Water to prepare administratively and to educate property owners about the new fees, as well as give businesses and residents time to budget for the charges and pursue any applicable mitigation credits, ensuring a smoother rollout with butter buy-in.
- We also encourage the County to refine the stormwater utility credit manual to make credits more attractive for property owners who reduce their stormwater impact. In particular, extending the duration of credits from 1-year terms to at least 5 years before renewal is needed. A five-year credit term will improve certainty for property owners investing in stormwater improvements and reduce administrative burdens from annual reapplication. The costs for preparing the application for several one-year credits, including ones that require surveys and sealed drawings, is not worth the cost of applying. Increasing these credits to 5 years will make the application worth the cost. Additionally, we ask for an increase to the credit values for properties that implement measures exceeding the Georgia Stormwater Management Manual (GSMM) and Cobb County standards. Rewarding sites that go above and beyond will incentivize more private investment in stormwater control, ultimately benefiting the County's overall system.

Chapter 18: Section 28 – *Building Code Technical Assistance*

The Council asks that county staff implement a process to determine whether outside technical assistance will be required at the permit application stage. Identifying early in the process whether additional support will be needed will ensure that permit review times can be accurately managed and applicants are not surprised by additional costs or permit delays based on technical assistance being required.

The Council for Quality Growth appreciates your consideration and leadership on these important issues. We stand ready to remain engaged – our organization will continue to offer technical assistance, regional data, and collaborative input as needed to refine Cobb's approach to water and stormwater management. Thank you for the opportunity to provide this feedback, and please know that we are eager to work together toward solutions that support both quality growth and sound infrastructure in Cobb County.

Sincerely,

Michael Paris
President & CEO

Matt Yarbrough
Director, Policy & Government Affairs

Carson Brown
Policy Analyst

CC: Dr. Jackie McMorris, County Manager
Judy Jones, Water Systems Director
Jessica Guinn, Community Development Director
Pamela Mabry, County Clerk