

**DATE:** August 4, 2022

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**TO:** Mayor Troy Brumbalow, City of Cumming  
**ATTN TO:** Scott Morgan, Planning and Zoning Director, City of Cumming  
**FROM:** Mike Alexander, Director, ARC Center for Livable Communities

The Atlanta Regional Commission (ARC) has received the following proposal and is initiating a regional review to seek comments from potentially impacted jurisdictions and agencies. The ARC requests your comments related to the proposal not addressed by the Commission's regional plans and policies.

**Name of Proposal:** 2022 City of Cumming Annual CIE Update

**Description:** A regional review of the draft 2022 City of Cumming Annual CIE Update.

**Submitting Local Government:** City of Cumming

**Action Under Consideration:** Approval

**Date Opened:** August 4, 2022

**Deadline for Comments:** August 25, 2022

**THE FOLLOWING LOCAL GOVERNMENTS AND AGENCIES ARE RECEIVING NOTICE OF THIS REVIEW:**

ATLANTA REGIONAL COMMISSION  
GEORGIA DEPARTMENT OF TRANSPORTATION  
GEORGIA ENVIRONMENTAL FINANCE AUTHORITY

GEORGIA DEPARTMENT OF NATURAL RESOURCE  
GEORGIA REGIONAL TRANSPORTATION AUTHORITY  
FORSYTH COUNTY

GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS  
GEORGIA SOIL AND WATER CONSERVATION COMMISSION

**Attached is information concerning this review.**

If you have any questions regarding this review, please contact Donald Shockey at [dshockey@atlantaregional.org](mailto:dshockey@atlantaregional.org) or 470-378-1531. If ARC staff do not receive comments from you on or before **August 25, 2022**, we will assume that your agency has no comments and will close the review. Comments via e-mail are strongly encouraged. The ARC review website is located at <https://atlantaregional.org/community-development/comprehensive-planning/plan-reviews/>.

CITY OF CUMMING  
STATE OF GEORGIA

RESOLUTION \_\_\_\_

A RESOLUTION AUTHORIZING THE TRANSMITTAL OF THE DRAFT FIVE—  
YEAR UPDATE OF THE COMPREHENSIVE PLAN AND A DRAFT ANNUAL  
UPDATE OF THE CAPITAL IMPROVEMENTS ELEMENT OF THE  
COMPREHENSIVE PLAN TO THE ATLANTA REGIONAL COMMISSION FOR  
REQUIRED REGIONAL AND STATE REVIEW AND REQUESTING ITS FAVORABLE  
CONSIDERATION

WHEREAS; The City of Cumming has adopted a comprehensive plan and has adopted a development impact fee program; and

WHEREAS; The comprehensive planning requirements specified in administrative rules of the Georgia Department of Community Affairs require local governments to update their comprehensive plans every five years by a recertification deadline in order to maintain status as a qualified local government; and

WHEREAS; The administrative rules for compliance with the Georgia Development Impact Fee Act (DCA Rules 110-12-2) require local governments charging development impact fees to annually update and amend as necessary the Capital Improvements Element (CIE) of the comprehensive plan; and

WHEREAS, The city is also required to annually update its community work program component of the comprehensive plan; and

WHEREAS; The City of Cumming has prepared a five-year update of its comprehensive plan including an annual update of its capital improvements element (CIE); and

WHEREAS; The city hereby certifies that it has considered the state's rules for environmental planning criteria in its comprehensive plan and land use regulations and has also considered the regional water plan; and

WHEREAS; The Cumming City Council hereby certifies that it has met the minimum procedural requirements for updating the comprehensive plan and for annually updating the capital improvements element;

Now, therefore, IT IS RESOLVED as follows:

1.

The City Council hereby authorizes the transmittal of a signed copy of this resolution and a draft copy of the five-year update of the comprehensive plan (including community work program) as well as a draft copy of the annual update of the capital improvements element (CIE) to the Atlanta Regional Commission for required regional and state review. The city will also submit a copy of its report of accomplishments describing actions taken to implement the previous version of the comprehensive plan. The City Council hereby requests favorable consideration of the same.

So RESOLVED, this the 19<sup>th</sup> day of July, 2021.

  
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Mayor

ATTEST:

  
\_\_\_\_\_

City Clerk

Approved as to Form:

  
\_\_\_\_\_

City Attorney



**City of Cumming**  
**Impact Fees**  
**Annual Financial Report for FY 2021**

<b>Public Facility Type</b>	<b>Roads</b>	<b>Park &amp; Rec</b>	<b>Public Safety</b>	<b>Total</b>
Service Area	City-Wide	City-Wide	City-Wide	
Beginning Impact Fee Fund Balance	888,070.87	1,085,146.55	164,799.58	2,138,017.00
Impact Fees Collected	630,128.20	683,017.70	103,945.80	1,417,091.70
Accrued Interest				-
Project Expenditures	1,510,312.89	1,757,840.02		3,268,152.91
Administrative Costs				-
Impact Fee Refunds				-
Ending Impact Fee Fund Balance	7,886.18	10,324.23	268,745.38	286,955.79

# **CAPITAL IMPROVEMENTS ELEMENT (CIE) CITY OF CUMMING, GEORGIA, COMPREHENSIVE PLAN**

## **SUMMARY**

This document is an element of City of Cumming’s comprehensive plan, known formally as the Capital Improvements Element (CIE). It specifies capital improvements for which development impact fees have been and will continue to be charged in the city’s land use jurisdiction (i.e., city limits). Those facilities are parks, public safety, and roads.

This CIE is essentially a readoption of the CIE components that the city put in place when it established the development impact fee program, but with updates to the land use assumptions and extensions to the assessments of demands for facilities. Many of these components were included in a primary source document for the city’s first CIE, which is the “Impact Fee Study” by Duncan Associates, dated April 2018.

## **REQUIREMENTS**

To support a development impact fee program, the CIE of the comprehensive plan must meet state administrative rules for Capital Improvements Elements (CIEs).<sup>1</sup> The rules, among other things, require that, for each facility included in the development impact fee program, the following must be included: a service area must be established; a quantifiable level of service (LOS) standard must be specified; long-term needs (demands) shall be assessed; and a schedule of improvements identifying projects to be funded with impact fees during the next five years must be submitted and then annually updated after its adoption.

## **PROJECTIONS, FORECASTS, AND LAND USE ASSUMPTIONS**

CIEs are required to set forth the land use assumptions, or data that provide the basis for projecting facility needs. Essential data include housing units, occupied housing units, housing vacancy rates, population, and employment. In addition, public safety facilities serve both residential and nonresidential development, thus, the variable representing development impacts is referred to as the “functional population,” or a combination of residential and nonresidential development.<sup>2</sup>

The 2019 Duncan study utilized an average household size of 2.91 persons per unit, with an average of 3.00 for detached single-family units and 2.07 for multi-family dwelling units. Table 1 provides updated estimates for 2022 and projections or forecasts for 2042 of population/housing, employment, and functional population.

The current number of housing units (2022) was derived by adding to the 2020 decennial census figure for population in the city (7,318) the population at 2.54 persons by unit for the number of new housing starts from April 1, 2020 to the current date, assuming a housing vacancy rate of 6.5%.

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<sup>1</sup> Rules of Georgia Department of Community Affairs, Chapter 110-12-2, Development Impact Fee Compliance Requirements

<sup>2</sup> The functional population is defined differently from that in the Duncan Study (2018).

Projections are based on a forecast of projected housing units already entitled in (mostly) mixed use developments, along with an assessment of additional housing to be constructed on vacant tracts during the planning horizon. The current entitled but not constructed or under construction residential developments total 2,797 units, plus 220 institutional units. This is basically a doubling of housing units currently in the city, plus housing construction potential on current vacant tracts not otherwise counted in the housing entitlement figure.

Cumming and Forsyth County are in the midst of an extensive building boom, and due to the amount of current and anticipated upcoming activity, the number of housing starts is not going to be spread evenly throughout the planning horizon. Rather, the bulk of these units are expected to be constructed during the next five years. This means the population increase is weighted heavily toward the first five years and declines in terms of rate of growth in subsequent five-year periods.

**Table 1**  
**Projections and Forecasts, 2022-2042**  
**City of Cumming**

<b>PROJECTION/FORECAST</b>	<b>2022</b>	<b>2027</b>	<b>2032</b>	<b>2037</b>	<b>2042</b>
Total Housing Units	2,992	3,957	4,796	5,346	5,846
Housing Units Added During Five-year Period	--	965	839	550	500
Occupied Housing Units	2,797	3,700	4,484	4,998	5,466
Vacancy Rate	6.5%	6.5%	6.5%	6.5%	6.5%
Households	2,797	3,700	4,484	4,998	4,998
Persons Per Unit	2.54	2.54	2.54	2.54	2.54
Household Population	7,104	9,398	11,389	12,695	13,883
Group Quarters Population	667	887	1,327	1,547	1,767
Total Population	7,771	10,285	12,716	14,242	15,650
Employment	18,000	20,500	23,000	25,500	28,000
Functional Population (Total Population + Employment)	25,771	30,785	35,716	38,742	43,650

Source: Jerry Weitz & Associates, Inc. May 2022. Note: Data are for July 1<sup>st</sup> of each year.

Employment data for cities and small areas is difficult to come by, and few if any reputable sources exist that estimate or forecast employment at such small levels of geography. The 2016 comprehensive plan forecasted that Cumming would increase employment from 16,000 in 2016 to 36,000 in 2036, or an increase of 20,000 (i.e., an annual increase of 1,000 annually in the city). In retrospect and considering current conditions, those forecasts are considered too high. This CIE utilizes a figure of 500 new jobs annually.

Historically, average household size has declined. However, in recent years and per the most recent decennial census, persons per dwelling unit are holding steady or increasing. This CIE assumes a steady household size of 2.54 persons per dwelling unit. Further, due to increasing challenges of affordability and trends such as a “doubling up” occupancies and the rise of multi-

generational households, this CIE assumes the household size will remain steady throughout the planning horizon. This general figure is reasonable and there is not a need to use a lower household size for multi-family units.

## **SERVICE AREAS**

The service area for all impact fees charged by the City of Cumming is the city limits.

## **LEVEL OF SERVICE**

### **Parks and Recreation**

Cumming's impact fee program utilizes functional population rather than resident population because the city has a substantial share of the county's nonresidential development and employees of nonresidential development are expected to utilize the city's park system. The park level of service in the Cumming methods report is a ratio of the replacement value of existing City parks (including land and improvements) to the number of existing service units (in this case, the functional population). The level of service standard for parks adopted in the Cumming impact fee program is \$1,952 per functional resident. After adjusting for SPLOST credits, that figure is \$960 per functional resident. This standard was based on the then-current park level of service provided by existing City parks and recreation facilities. No change is made to this level of service standard.

### **Public Safety**

Like parks and recreation, the public safety level of service is expressed in terms of the replacement value of existing public safety facilities per service unit (functional population). The cost in 2019 was calculated by Duncan & Associates as \$170 per functional population, and that existing level of service was adopted as the level of service standard. This updated CIE proposes no change to the adopted level of service standard of \$170 per functional population for public safety facilities.

### **Roads**

For the road impact fee the City of Cumming uses daily vehicle miles of travel (VMT). As of 2019, the road level of service was a system-wide ratio of vehicle miles of capacity to vehicle miles of travel (VMC/VMT) of 1.66. A VMC/VMT ratio of 1.25 was adopted by Cumming and remains the level of service standard.

## **ASSESSMENT OF DEMANDS**

During the 20-year planning horizon (2022 to 2042), Cumming's functional population will increase to 17,879. For parks and recreation, at the adopted level of service standard of \$960 per functional population, this means the city will need to add \$17,163,840 in park and recreation facility valuation. For public safety, at the adopted level of service standard of \$170 per functional population, the city will need to add \$3,039,430 of public safety valuation.



## SCHEDULE OF IMPROVEMENTS

From 2023 to 2027, the city will add 5,014 to its functional population. This translates to a need to add park and recreation value of \$4,813,440 at the adopted level of service standard. A schedule of improvements for park and recreation is provided in Table 2. That figure is in addition to park and recreation impact fee funds already acquired. The schedule is highly generalized and flexible because, to meet the level of service standard, all the city has to do is show expenditures of this amount have gone toward park and recreation capital facilities. The city can choose what projects it desires to fund. Specific projects identified in past CIEs include additions to Dobbs Creek Recreation Center, additions to the Aquatic Center, and various improvements at the fairgrounds.

**Table 2**  
**Schedule of Improvements, 2023-2027**  
**Parks and Recreation**

Capital Improvement/ Authorized expenditure	Dollars (\$)						Source of Funds	% Eligible for Funding with Impact Fees
	2023	2024	2025	2026	2027	Total 2023-2027		
Any/all park and recreation capital improvement projects						4,813,440	IF	100%
TOTAL		2,406,720		2,406,720		4,813,440	IF	100%

Source: Jerry Weitz & Associates, May 5, 2022. Notes: IF = Impact fees.

From 2023 to 2027, the city will need to add value to the public safety capital facilities of the city of \$170 per functional population. As noted above, the city's functional population will increase of by 5,014 per functional resident. This translates to a total obligation of \$852,380. A schedule of improvements for public safety is provided in Table 3. Specific projects identified in past CIEs are a new public safety complex and a modular firing range.

**Table 3**  
**Schedule of Improvements, 2023-2027**  
**Public Safety**

Capital Improvement/ Authorized expenditure	Dollars (\$)						Source of Funds	% Eligible for Funding with Impact Fees
	2023	2024	2025	2026	2027	Total 2023-2027		
Any/all public safety capital improvement projects		426,190		426,190		852,380	IF	100%
TOTAL		426,190		426,190		852,380	IF	100%

Source: Jerry Weitz & Associates, May 5, 2022. Notes: IF = Impact fees.

For roads, the city will continue to be authorized to spend road impact fee funds on projects listed in its adopted schedule of improvements, which is readopted below as Table 4.



**Table 4**  
**Road Schedule of Improvements, 2023-2027**

<b>Capital Improvement/ Authorized expenditure</b>	<b>Dollars (\$) Total 2023-2027</b>	<b>Source of Funds</b>	<b>% Eligible for Funding with Impact Fees</b>
Intersection improvements	7,500,000	IF	100%
Industrial Park Drive Extension	1,000,000	IF	100%
Buford Dam Road Extension Atlanta Highway to Veterans Memorial Boulevard	1,000,000	IF	100%
Kelly Mill Road widening to 3 lanes from SR 20 for 0.8 mile	850,000	IF	100%
Maple Street widening from Kelly Mill Road to SR 20	950,000	IF	100%

Source: Jerry Weitz & Associates, May 5, 2022. Notes: IF = Impact fees.