



January 20, 2021

Commissioner Tim Keane
Development Impact Fee Advisory Committee
City of Atlanta
55 Trinity Ave., SW #3350
Via email COAImpactFees@atlantaga.gov

RE: Recommendations for Updating Atlanta's Impact Fee Structure

Dear Commissioner Keane & Committee Members:

As a committed development partner in the City of Atlanta any changes to policies and ordinances that affect building and development are critically important to us. We appreciate the months of research via the Impact Fee Study and the opportunities made available by the committee for builders, developers, and community members to have input during this process.

As the committee intends to vote and submit final recommendations to the City Council for consideration, we want to ensure that the below key items are defined and addressed in those recommendations.

Implementation and Fee Structure

We recommend the committee consider a phased in incremental increase of 20% each year over the next 5 years. There have been no increases to impact fees in nearly thirty (30) years, therefore while a two (2) year phase in as currently recommended, is appreciated, a five (5) year phase in is much more practical. Additionally, with the City also considering changes to the tree protection ordinances, stormwater fees, and residential design standards builders and developers must not only consider the effect of an impact fee increase but the others previously listed as well.

Housing Affordability

As discussed above, the City of Atlanta is currently considering changes to impact fees, tree protection ordinances, stormwater fees, and residential design standards. These all contribute to the increased cost of construction and are essentially counter to the City's Affordable Housing efforts. Therefore, serious consideration should be given to provide 100% exemption for all residential units, whether for-sale or rental.

Effective Date

Staff should recommend a date not less than 6 months from the adoption date of the ordinance for the ordinance to take effect.

Grandfather Clause

Consider a grandfather clause for any projects already zoned or for which a rezoning application has been filed before the effective date of the impact fees ordinance where the fees will be vested under the City's current fee structure.

Again, we appreciate the committees significant time invested in research regarding an increase in impact fees, the transparency in the process, and the opportunity for builder, developer, and community input. We hope that consideration will be given to our above recommendations. We look forward to continuing to be a key partner in the development of the City of Atlanta.

Sincerely,



Tiffany D. Hogan
Forward Planning Manager
tdhogan@drhorton.com
678-780-8526