

January 19, 2022

Mayor Van R. Johnson, II  
P.O. Box 1027  
2 East Bay Street  
Savannah, GA 31401

**RE: City of Savannah Draft Capital Improvement Element**

Mayor Johnson:

The Department of Community Affairs (DCA) has notified the Coastal Regional Commission (CRC) that they have determined the City of Savannah draft CIE adequately addresses the *Development Impact Fee Compliance Requirements*. DCA has also included advisory comments for the plan preparer.

In accordance with the *Development Impact Fee Compliance Requirements*, the next step is for the city to fulfill any remaining public feedback requirements and adopt the plan. Following adoption, please transmit a final version of the CIE and adoption resolution to the CRC.

If you have any questions, please contact me by calling (912) 223-9258 or by emailing [acarpenter@crc.ga.gov](mailto:acarpenter@crc.ga.gov).

Sincerely,



Aaron Carpenter  
Planning Director

Attachments

c: Joseph A. Melder, Savannah City Manager  
Bridget Lidy, Savannah Planning and Urban Design Director  
Juli Yoder, DCA

**Subject:** City of Savannah CIE: Approved w/Advisory  
**Date:** Wednesday, January 18, 2023 at 4:45:39 PM Eastern Standard Time  
**From:** Juli M Yoder  
**To:** Aaron Carpenter  
**CC:** Planning, Zane Grennell  
**Attachments:** image001.jpg

Aaron,

Our staff has reviewed the new Capital Improvement Element (CIE) for the City of Savannah and finds that it adequately addresses the Local Planning Requirements. The next step is for the local government to adopt the CIE. We also have advisory comments for the plan preparer. As soon as your office provides written notice that the CIE Amendment has been adopted and provides DCA with a digital copy of the final adopted version of the new CIE, we will update our records to reflect the changes in the amendment.

**Advisory Comments:**

*Trail System*

- Whereas it is acceptable to break apart fee programs into more specific categories (i.e. Public Safety into Police and Fire Services), the logic purposed for Parks and Recreation and Trail Systems is still unclear. As stated in your response comments, the City intends to have “Trail System”, “as a sub-category due to the unique nature of the project type”, yet it is broken out in the narrative as if it is, in fact, its own programmed category. A typical CIE would either have the *Tide to Town* project simply listed within the tables of Parks and Recreation section and have the project listed in the Community Work Program - or have the Trail System as its own separate category with separate collections, calculations, and methodology. In its current format, the narrative suggests it is, in fact, its own separate category. DCA has interpreted the “Trail System” category to be a separate collection category from “Parks and Recreation”, both under the *Parks and Recreation* umbrella from statute. Just like “Police” and “Fire” services are separate collection categories, but both under the *Public Safety* umbrella from statute. “Trail Systems” appear to be a separate collection category because:
  - It has separate level of service standards from “Parks and Recreation” – which leads to a different methodology and fee collections.
  - “Trail Systems” is listed as a separate category on page 7 (Table 1) in the document.

Because of this, we do expect to see “Trail Systems” reported on separately from the “Parks and Recreation” collection category in the following annual updates.

*Other*

- We noticed “Appendix E: Exemptions Policy” was added to this copy and that the “Property Tax Credits” section has been removed. We just wanted to bring this to your attention.

Thanks,



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**Juli M Yoder, AICP**  
Principal Planner | Manager, Office of Planning  
Georgia Department of Community Affairs  
60 Executive Park South, NE  
Atlanta, Georgia 30329