

**Response to HB841, Proposed City of East Cobb
Version 8 – April 24, 2022**

Prepared by:
Robert Lax
Marietta, GA 30068

This response was prepared with publicly available information to inform my neighbors and other voters of HB841, Proposed City of East Cobb. For clarity, I am not opposed to cityhood per se, but I am a **CONSERVATIVE who is OPPOSED** to the current East Cobb Cityhood initiative based on the information available today, and how the bill was put forward. Adopting cityhood should be a thoughtful, thorough, and transparent process that engages the entire community.

Key Links

- <https://www.eastcobbga.com/> - Website created by city proponents
- <https://eastcobballiance.com/> - Website created by city opponents
- <https://eastcobbnews.com/east-cobb-cityhood-news/> - East Cobb News Cityhood website
- <https://www.cobbcounty.org/communications/info-center/cityhood> - Cobb County Cityhood Resource Center
- <https://www.cobbcounty.org/community-development/planning/comprehensive-planning> - Cobb County Community Planning website
- <https://www.legis.ga.gov/legislation/60811> - Georgia General Assembly website

1. Why do proponents want to create a new City of East Cobb?

- a. The East Cobb Cityhood website states: “Cobb County is becoming too big and too removed from our daily lives to continue to manage our affairs optimally. Thinly spread commissioners are not invested in the job of helping East Cobb become the community that it can be and that we want it to be.” <https://www.eastcobbga.com/council>
- b. Note the same web page acknowledges that Cobb County “Residents enjoy some of best public schools in the state. And, they receive top-notch protective services like Police and Fire.”
- c. During their webinar of February 10, 2022, cityhood proponents provided “5 Reasons to Incorporate the City of East Cobb”, specifically:
 - Local representation closer to the people - Matt Dollar said toward the end of the webinar that the mayor and city council will be "extremely part-time positions". One could reasonably ask, how will "extremely part-time" officials provide better representation than “thinly spread commissioners”? Seems to be more of the same, at best.
 - Local control of zoning decisions - The cityhood committee spent a good bit of time during the webinar misrepresenting the Cobb County Comprehensive Plan and fearmongering residents to vote for the new city. See "What is the Cobb County 2040 Comprehensive Plan?" below for more information.
 - Responsive and visible policing in our neighborhoods – The cityhood committee did not spend much time on policing, other than a few comments about “speeders on

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Johnson Ferry Road”. See “What services do we presently get from Cobb County that would be replaced by the new city?” below for more information.

- Continue tradition of excellent fire protection we experience today - The cityhood committee devoted a good bit of time during the webinar discussing the success of the 10 cities incorporated in Georgia since 2005. What they did not say... ONLY 1 of those 10 cities has an ISO 1 rating... South Fulton. See " What services do we presently get from Cobb County that would be replaced by the new city?" below for more information.
 - Enjoy parks and recreation services without driving miles away - The cityhood committee admitted during the webinar that they had no plans to add parks, and the 2021 feasibility study omitted Parks and Recreation, and the cost to purchase existing parks from the county. See “What services do we presently get from Cobb County that would be replaced by the new city?” below for more information.
- d. Posts on social media have suggested three primary rationales for cityhood:
- More local control of zoning, for which proponents have specifically provided (on social media and also during their webinars and town halls) the following examples to demonstrate this need:
 - East Cobb Church mixed use development on the southwest corner of Johnson Ferry and Shallowford (known as the JOSH). See <http://eastcobbnews.com/north-point-east-cobb-church-plans-4-stories-1300-seats/> and <https://www.msn.com/en-us/news/us/north-point-ministries-megachurch-mixed-use-ok-d-in-east-cobb/ar-AAPijl> for additional information. While JOSH is presented by cityhood proponents as a case of the Cobb County Commission ignoring community input, in reality:
 - The county worked with citizen’s groups for over 11 months, holding numerous public hearings, to seek public input. Each hearing was consistently attended by a supportive majority.
 - The East Cobb Civic Association signed off on the final plan.
 - The residential portion of the development is a gated community, 5 dwelling units/acre, with public green space, around a low-profile church. Claims from cityhood proponents the development includes low-income housing are completely false.
 - Purchase of Parkaire and Avenue properties by developers that have developed / own dense mixed residential / commercial developments in Metro Atlanta, specifically Jamestown LP (<https://www.jamestownlp.com/properties>) and North American Properties (NAP) (<https://www.naproperties.com/projects/>) respectively. Cityhood proponents claim NAP acquired the Avenue, but that is not true. Rather the current owners (PGIM) have entered a partnership agreement with NAP

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<https://urbanize.city/atlanta/post/avenue-east-cobb-development-county-north-american-properties>).

- Concerns that the Cobb County 2040 Comprehensive Plan will densify East Cobb, specifically the Future Use Land Map (FLUM) and Cobb’s movement toward “Unified Development Code”. Note many cityhood claims are easily proven false with detailed inspection of the FLUM. See “What is the Cobb County 2040 Comprehensive Plan?” below for more information.
- “Tokyo Valentino” has been introduced as rationale for cityhood by several folks on social media, but that point has been debunked several times as a business license fraud issue. In fact, Cobb County should be commended for its representation of the community as it closed the business where Atlanta, Marietta and Sandy Springs have all failed to do so, despite multiple efforts. As noted in the following article in East Cobb News, Cobb County “commissioners overhauled the county code governing adult businesses” in their efforts to close the business (<http://eastcobbnews.com/east-cobb-tokyo-valentino-store-ordered-closed-by-judge/>).
- Most recently, cityhood proponents have turned to claiming Cobb County Commissioner Lisa Cupid intends to put low-income housing across Cobb. In reality, Commissioner Cupid committed to make “affordable housing” more available in Cobb. See <https://www.ajc.com/news/atlanta-news/cupid-inequality-housing-a-threat-to-cobbs-success/2NXJYWZWMBD6HGEWYZGQUOPEIQ/> for more information.
- Better services over what Cobb County provides today, citing Sandy Springs, Milton, Johns Creek, etc. cityhood as proof points. This is inconsistent with the messaging from the East Cobb Cityhood website that acknowledges Cobb County has “top notch” services. See “What services do we presently get from Cobb County that would be replaced by the new city?” below for more information.
- Several cityhood backers have noted on social media their concern with the 3-2 Democratic control over the Cobb County Commission, which previously had a 4-1 Republican majority, as their rationale to vote for cityhood. This was stated in 2019 by an early cityhood hired spokesperson, Phil Kent, who noted “Cobb County's relentless shift toward Democratic control” (<https://www.ajc.com/blog/politics/the-jolt-democrats-are-coming-warns-spokesman-for-city-east-cobb/r1e3ZpUzyk2jZ2AGMNLNXI/>).

2. What is the Cobb County 2040 Comprehensive Plan?

- a. Cobb County’s website states “A Comprehensive Plan is a long-range plan intended to direct the growth and physical development of a community for a 20+ year period. Preparing a comprehensive plan allows for utility, transportation, and community facilities planning,

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- aiding in a more time and cost-effective planning and budgeting program. The plan includes policies relevant to the development of various physical elements that make a community successful, including transportation, housing, recreation, and public facilities.” See Cobb County website for detailed information, and to sign up for updates and watch virtual meetings. <https://www.cobbcounty.org/community-development/planning/comprehensive-planning>
- b. Note the 2040 Comprehensive Plan was most recently approved in 2019 (under a Republican controlled Cobb County Commission), and is presently in a 5 Year Update cycle, which is not yet approved. There is still time for county residents to provide feedback in the process. An Open House is scheduled at the Cobb County Civic Center on Thursday, April 18, 2022. Replays from prior virtual meetings are available on the website above.
- c. A primary concern involves the Future Land Use Map (FLUM) (<https://s3.us-west-2.amazonaws.com/cobbcounty.org.if-us-west-2/prod/2021-03/2021FLUM.pdf>), which proponents state shows significant high density development planned for East Cobb. On further investigation using Google Maps and comparing to the Current Land Use Map (CLUM) on page 18 of the Cobb County Comprehensive Plan (https://s3.us-west-2.amazonaws.com/cobbcounty.org.if-us-west-2/prod/2021-02/COBB%202040%20COMPREHENSIVE%20PLAN%20FINAL_2021.pdf) reveals that:
- Cityhood proponent claims on social media and in Cityhood Committee webinars that Parkaire Landing has been rezoned high density residential (HDR) are not true. HDR is defined as 5-12 dwelling units per acre. Detailed investigation of the FLUM shows that Parkaire Landing (grid 85) remains “community activity center (CAC)” (i.e., retail), while grids 144 and 145 are zoned HDR, and these are the EXISTING apartment communities on Davidson Rd NE.
 - Cityhood proponent claims on social media and in Cityhood Committee webinars that Johnson Ferry between Lower Roswell and Paper Mill has been rezoned medium density residential (MDR) are not true. MDR is defined as 2.5-5 dwelling units per acre. Detailed investigation with Google Maps of the areas zoned MDR show these areas are largely already developed in MDR.
 - See “The Truth about East Cobb Zoning and the Cobb County Comprehensive Plan”, a comparison of the FLUM and existing developments using Google Maps, here: <https://drive.google.com/file/d/1yw0l4O3RnSjVZ3oruJJrocg3HhMQyCug/view?usp=sharing>.
- d. Many posters on social media sight specific concern with Cobb County adopting Unified Development Code, which Cobb County defines as “A unified development code is a single regulatory document that guides development within a jurisdiction. This may include zoning and subdivision regulations, infrastructure requirements, design guidelines, landscaping standards, sign regulations, etc. Cobb County currently has two primary documents that regulate development: the County Code of Ordinance and the Cobb County Development Standards. In addition to these regulatory documents, the County has also adopted design

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guidelines to offer additional standards for design, architecture, landscape, etc. in targeted areas of the County. In their entirety, these documents consist of several hundred pages, which are often overlapping and sometimes inconsistent. A unified development code would streamline these documents into one combined document that would be more easily accessible to the public, designers, and County staff reviewers.” Posters concerns with the UDC revolve around “urbanization” of East Cobb, but these concerns do not appear to be well founded. See the links below for additional information.

- <https://www.cobbcounty.org/community-development/news/unified-development-code-what-it-and-why-does-cobb-need-it>
 - <http://eastcobbnews.com/cobb-to-hold-town-hall-on-proposed-unified-development-code/>
- e. Note, I will concede, and other cityhood opponents would likely concede as well, that increased community involvement with Cobb County is important to preserve East Cobb’s current community profile.

3. What services do we presently get from Cobb County that would be replaced by the new city?

a. Police

- East Cobb is served by Cobb County Police, Precinct 4, with 79 dedicated personnel (based on a February 8, 2022 Open Records Request from Cobb County Police). See the following for more information on Precinct 4:
<https://www.cobbcounty.org/public-safety/police/about/precincts>.
- Cobb County Police Precinct 4 covers 10 patrol areas, or beats. As of February 8, Precinct 4 had 47 patrol officers covering those 10 beats (4.7 patrol officers per beat on average). The remainder of Precinct 4 includes: 2 leadership (Major and Captain), 3 lieutenants, 9 sergeants, 8 recruits, 2 on restricted duty, 1 on military leave, 2 civilians, 1 CIU lieutenant, 2 CIU sergeants and 4 CIU detectives.
- The 2021 feasibility study called for 71 police personnel for an area representing ~4 of Precinct 4’s beats. Extrapolating using simple math, assuming East Cobb has the same non-patrol headcount (32), the new East Cobb Police will have 39 patrol officers covering 4 beats (9.8 patrol officers per beat on average). That level of staffing would certainly provide more responsive and visible policing, but does the crime rate in East Cobb relative to Marietta, Roswell, and Sandy Springs necessitate over 2x the patrol officers and cost over what we have today?
- In fact, East Cobb has a low crime rate relative to Marietta, Roswell, and Sandy Springs. See <https://crimegrade.org/safest-places-in-marietta-ga/> for a comparison. Note dark green is a grade of “A+”, orange is a grade of “F”.
- To this date, cityhood proponents have not provided any details concerning the new police department. It is not known if this new department would have specialized units like Crimes Against Children, Canine, Homicide, SWAT, Bomb, Traffic Fatality,

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Gang, Crisis Negotiation, etc. as Cobb County Police does. Cobb County Police also has extensive training facilities (<https://www.cobbcounty.org/public-safety/police/about/department-units/training-unit>)... where will these be in East Cobb and how will they be funded?

- Cobb County Police Academy – The Cobb County Public Safety Police Academy is a 115,369 square-foot facility located on nineteen acres in southwestern Cobb County.
- Health and Fitness Center – The health and fitness center is a 7,000-square foot area that is equipped with state-of-the-art strength training equipment, free weights, cardio, and “Purmotion” cross-fit equipment.
- Weapons Training Facility – The Weapons Training facility is located off County Services Pkwy and includes a firearms training range.
- EVOC Facility – The EVOC facility is located off Al Bishop Drive and encompasses 10+ acres and includes a separate skid pan area, as well as an asphalt surfaced multi-purpose area.

b. Fire & Emergency

- East Cobb presently has 9 fire stations protecting ~190,000 residents.
- The cityhood proposal calls for 2 fire stations, currently Cobb County Fire Stations 15 and 21, which would increase the number of residents per fire station to ~30,000 (~60,000 residents / 2 fire stations) from the current ~21,000 (~190,000 residents / 9 fire stations). The proposed area of the city of East Cobb is presently covered by 6 fire stations,
- Cobb County Fire has an ISO 1 rating (rating is 1-10, 1 is the highest / best rating). There are approximately 29,700 fire departments in the United States. Of these, only 106 departments have an ISO 1 rating... 106 of 29,700, or .35%. Additionally, there are only 290 agencies accredited by CPSE/CFAI in the United States. Only 12% of the US Population is protected by an accredited fire department as we are in Cobb County (<https://www.ajc.com/news/local/cobb-fire-emergency-receive-highest-class-rating/8rAQy3xSjXLYsi39YhyOqL/>).
- The cityhood committee often highlights the success of the 10 cities incorporated in Georgia since 2005. What they do not say... ONLY 1 of those 10 cities has an ISO 1 rating... South Fulton. Sandy Springs, Milton, Johns Creek and all the Dekalb and Gwinnett County cities fire departments have an ISO 2 rating. Chattahoochee Hills fire department has an ISO 4 rating. Milton was initially assessed an ISO 4 rating, and only achieved an ISO 2/2X rating in September 2015, nearly 9 years after incorporation (<https://patch.com/georgia/alpharetta/milton-fire-department-receives-lower-iso-rating>). Cityhood proponents have provided no detailed plan on how East Cobb would maintain its top ISO rating while 9 of 10 of these other cities have not been able to achieve this top rating.

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- Homeowner’s insurance rates in East Cobb (in fact in entire Cobb County) benefit from its ISO 1 rating. If East Cobb’s rating is lowered to a 2, 3 or 4 as a result of cityhood, our homeowner’s insurance premiums will increase, and our property values will decrease. When Smyrna Fire Department, the same department used as the primary benchmark for the City of East Cobb in the 2021 feasibility study, achieved its ISO 2 rating, previously an ISO 3 rating, the city of Smyrna told their residents that they could expect up to 8% savings on their home and business insurance premiums (<https://www.smyrnaga.gov/your-government/public-safety/fire-department/iso-rating>).
- Comparing the current Cobb County Fire response time map to the proposed East Cobb City response time map reveals that the western edge of the city will see increased response times for fire and emergency. This is due to the coverage area of the new city being ~13% larger than the current coverage area of Fire Stations 15 and 21. See current and proposed response time maps below, note red is the slowest response time:
 - Current Cobb County Fire response time map - [https://s3.us-west-2.amazonaws.com/cobbcounty.org.if-us-west-2/prod/2022-03/CobbFireTravelTime%20\(Current\)_0.pdf](https://s3.us-west-2.amazonaws.com/cobbcounty.org.if-us-west-2/prod/2022-03/CobbFireTravelTime%20(Current)_0.pdf)
 - Proposed City of East Cobb Fire response time map - [https://s3.us-west-2.amazonaws.com/cobbcounty.org.if-us-west-2/prod/2022-03/EastCobbFireTravelTime%20\(Proposed\).pdf](https://s3.us-west-2.amazonaws.com/cobbcounty.org.if-us-west-2/prod/2022-03/EastCobbFireTravelTime%20(Proposed).pdf)
 - Side-by-side comparison map - <https://s3.us-west-2.amazonaws.com/cobbcounty.org.if-us-west-2/prod/2022-03/Maps-Side-by-Side.pdf>

c. E911

- Cobb County currently provides E911 services for Unincorporated Cobb as well as the City of Marietta through an integrated dispatch center. Cobb County has economies of scale and a robust training program that allows them to provide high quality E911 services. In fact, Cobb County E911 has been recognized as one of the best E911 services in the nation (<https://www.ajc.com/neighborhoods/cobb/cobbs-e911-ranked-among-best-in-nation/UZP746M2GVD5JFSYZPVC3JLX3M/>).
- According to a 2019 FCC study, 80% of E911 calls come from wireless phones, and 12% of those calls are misrouted (~10% of all E911 calls). This is because a wireless E911 call is routed to the E911 center closest to the cell tower to which the caller is connected, not closest E911 center to the caller.
- Adding East Cobb E911 would likely increase the number of reroutes because of the close proximity of E911 districts and location of cell towers (i.e., residents of East Cobb connecting to cell towers in Unincorporated Cobb and vice versa).
- Rerouted calls increase E911 response time by 40 seconds on average, because the dispatch center receiving the rerouted call must physically call the correct dispatch

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- center to pass off the call. This 40 second handoff impacts all services: police, fire, and emergency.
- Maintain a high performing E911 service such as Cobb County's is difficult. The stress of the job takes a toll on E911 dispatchers, and the opportunity to make a better living elsewhere leads to high attrition. As noted by the AJC, "This ain't for the weak or the weary" (<https://www.ajc.com/news/incentives-part-of-plan-to-attract-retain-911-dispatchers-amid-high-turnover/J4KFM6YU5NEIXCOPKJDDOMHC24/>).
 - Why would East Cobb take responsibility for critical (and challenging) E911 services when even Marietta uses Cobb County? How much risk are you willing to accept that East Cobb will be there when you need to call 911?
- d. Parks and Recreation – Note the 2021 feasibility study states P&R will be left with the county, while the legislation includes P&R. Accordingly, the feasibility study omits the cost for the city to purchase existing parks from Cobb County. In addition, cityhood proponents have admitted on webinars that they have no plans to add parks to East Cobb.
 - e. Planning and Zoning
 - f. Code Adoption and Enforcement

4. What is the current legislation?

- a. The legislation is HB841, which is available at <https://www.legis.ga.gov/legislation/60811>.
- b. The legislation was sponsored in the Georgia House by Representatives Matt Dollar, Sharon Cooper, and Ed Setzler. Note Matt Dollar resigned his seat after the legislation passed the House (<https://eastcobbnews.com/east-cobb-cityhood-bill-sponsor-resigns-from-ga-legislature/>), and Sharon Cooper and Ed Setzler do not live in the proposed city limits.
- c. The legislation was initially introduced into the Georgia House in March 2021, and at that time, police and fire were excluded, and the Election Date was set for the November 2022 General Election. In the 2022 Legislative Session, Matt Dollar abruptly revised the legislation with no input from the general East Cobb community. Police and Fire were added (back) in, and the Election Date of the Cityhood Referendum was quietly changed to the May 24, 2022 Primary Election. When asked by the House Committee members "What changed between the March 2021 version and this revised one?", Matt Dollar stated to the committee "I don't remember." The legislation was approved by the House on January 27, 2022 (<http://eastcobbnews.com/breaking-news-east-cobb-cityhood-bill-passes-ga-house/>).
- d. The legislation was revised and approved in the Georgia Senate on February 10, 2022 (<https://eastcobbnews.com/east-cobb-cityhood-bill-passes-ga-senate-returns-to-house/>). The legislation was sponsored in the Georgia Senate by Senator John Albers, who also does not live in the proposed city limits.
- e. The revised legislation was adopted by the Georgia House on February 14, 2022 (<http://eastcobbnews.com/east-cobb-cityhood-bill-gets-final-passage-in-ga-legislature/>).

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- f. The approved legislation was signed into law by Governor Brian Kemp on February 24, 2022 <http://eastcobbnews.com/east-cobb-cityhood-bill-signed-into-law-may-24-referendum-set/>
- g. A public vote on HB841 will be held on May 24, 2022, exactly 3 months after being signed into law, and only ~5 months after being introduced into legislature in its current form.
- h. Note there have been three different versions of the cityhood proposal that are significantly different from each other.
 - Version #1 (2019) included 100,000 residents as well as police, fire, and emergency in the bill. This proposal was introduced in 2019 but received widespread opposition so the effort was dropped. Some believe the initial effort was started as a reaction to the Cobb County Commission flipping to Democratic control (<https://www.ajc.com/blog/politics/the-jolt-democrats-are-coming-warns-spokesman-for-city-east-cobb/rle3ZpUzyk2jZ2AGMNLNXI/>).
 - Version #2 (March 2021) called “city lite” removed police, fire, and emergency, and only included planning and zoning, and parks and recreation. See the following for more information: <http://eastcobbnews.com/breaking-news-east-cobb-cityhood-effort-revived-new-services-proposee/>
 - Version #3 (January 2022, current version) put back in police, fire, and emergency, halved the area, and reduced the number of residents to ~60,000.
 - The proposed cityhood map can be found at <http://eastcobbnews.com/wp-content/uploads/2021/11/East-Cobb-revised-city-map-8.26.21.pdf>.
- i. **If you read any link in this commentary, please read the following editorial published in East Cobb News:** <https://eastcobbnews.com/editors-note-why-the-rush-for-cobb-cityhood-referendums/>

5. What concerns do I have with the proposed new city?

- a. While proponents have stated their primary objective of cityhood is local zoning control, they have provided no written details on their vision or plans for zoning as compared to the Cobb County Comprehensive Plan, separate from, or included in, HB841.
 - Zoning must be fair and consistent, taking care not to infringe on owners’ property rights. This was reinforced when a DeKalb County jury recently ordered the city of Brookhaven, its mayor, and city manager to pay more than \$6 million in damages to a real estate developer and two homeowners for purposefully stalling a townhome development project (<https://www.ajc.com/neighborhoods/dekalb/brookhaven-ordered-to-pay-about-6m-over-failed-mixed-use-project/BPKWCGRQSJEURK6YIWXTEETMSA/>).
 - Cobb County has decades of experience in planning and zoning and takes community input to improve their policies and processes. In fact, Cobb County recently extended the timeline for public review of zoning submissions by developers and other applicants before zoning hearings

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[\(https://cobbcountycourier.com/2022/04/cobb-county-neighborhood-advocates-ask-for-more-advance-access-to-review-zoning-documents-before-hearings/\)](https://cobbcountycourier.com/2022/04/cobb-county-neighborhood-advocates-ask-for-more-advance-access-to-review-zoning-documents-before-hearings/).

- Do we really want to turn over zoning decisions to an inexperienced group that openly says they intend to restrict property use, and thereby open the new city and taxpayers to significant potential liability?
- b. County services for East Cobb, specifically Police, Fire and E911, are “top notch”. East Cobb is not underserved as many of the nearby new cities were.
- Cityhood proponents admit on their website that East Cobb services are “top notch”. See “Why do proponents want to create a new City of East Cobb?” above.
 - East Cobb is well served by Cobb County Police as evidenced by our low crime rates, especially relative to the surrounding areas of Marietta, Roswell, and Sandy Springs. See “What services do we presently get from Cobb County that would be replaced by the new city?” above.
 - East Cobb is well served by Cobb County Fire as evidenced in their ISO 1 rating, the top rating held by only .35% of all fire departments in the US. Creating East Cobb Fire would jeopardize our current ISO 1 rating, increase response times to communities on the west side of the new city, raise our homeowner’s insurance premiums, and lower our property values. See “What services do we presently get from Cobb County that would be replaced by the new city?” above.
 - East Cobb is well served by our current Cobb County E911, and creating our own E911 services would be unnecessarily difficult, impractical, and likely increase emergency response times. See “What services do we presently get from Cobb County that would be replaced by the new city?” above.
 - I do not believe improved services are justification for cityhood, in fact, I believe services would likely decline, especially given the likely funding challenges noted in the point immediately below, leading to reduced services, increased taxes, increased property insurance premiums, and reduced property values.
- c. The cost to operate the city will exceed expectations because the 2021 feasibility study is inaccurate and incomplete.
- The 2021 feasibility study can be found at the following link:
https://www.eastcobbga.com/2021_east_cobb_feasibility_study.
 - The 2021 feasibility study assumes the East Cobb Government Center will become city hall for the new city and can be acquired for \$0. This is not consistent with state law (see code bullet below). Note this building was valued at ~\$3 million in 2019 (based on Open Records Request for insured value at the time). See the following for more information: <https://eastcobballiance.com/2022-cityhood-analysis/east-cobb-government-center-reality/>

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- Using Sandy Springs as a comparison, the bond for their City Center created a tax burden of \$195,000,000 (including interest over decades) along with an additional \$1,000,000 annually every year since it opened due to shortfall in revenue.
- The 2021 feasibility study assumes the Cobb County Police Precinct 4 would be transferred with the East Cobb Government Center at no cost. This is not consistent with state law (see code bullet below).
- The 2021 feasibility study calls for two fire stations (Cobb County Fire Stations 15 and 21) that can be acquired for \$5,000 each. This is consistent with state law (see code bullet below).
- The 2021 feasibility study assumes that all police and fire equipment will be transitioned to the new city at no additional cost. This is not consistent with state law (see code bullet below). While the new city can take possession of the fire stations, anything not attached to the property is considered “personal property”, not “real property” or “fixtures”. See the following for more information: <https://eastcobballiance.com/2022-cityhood-analysis/fire-department-reality/>.
- In addition, Sandy Springs, Milton, and Johns Creek all experienced gaps in equipment to provide police and fire services when they became cities:
 - Sandy Springs in their 2006 CAFR: “The City was successful in negotiating a contact with Fulton County for fire protection services for the fiscal year.” (https://drive.google.com/file/d/1EHOo_ha4k2jwaAbfxMTR1C_GDzVzYA0m/view?usp=sharing).
 - Milton in their 2007 CAFR: "The City also entered into a five-year long-term debt agreement to fund the purchase of the police and fire fleet of vehicles. This debt of almost \$3.2 million is due to be paid off in 2012." (https://drive.google.com/file/d/1uEp3TLj0Fnn_3oTXxc9BjsJo9PzBpavb/view?usp=sharing).
 - Johns Creek in their 2008 CAFR: "The City purchased 7 fire trucks, 7 staff vehicles, equipped the vehicles, and hired 78 employees for the October 7, 2008 establishment of the Fire Department." (<https://drive.google.com/file/d/1akAxKhcRVipLjlddsI2V0Fmwz4XGZ9fw/view?usp=sharing>).
 - In the case of South Fulton, they did receive fire trucks from Fulton County, because they took over the entirety of Fulton County Fire, and Fulton County Fire ceased to exist. This was a negotiated agreement between the Fulton County and the City of South Fulton, and the city paid for the fire trucks, equipment, uniforms, etc. The city got a good deal, a fire sale you might say, as "The city paid \$5,000 apiece for 10 fire stations, ... and \$1 apiece for everything from refrigerators to firetrucks to uniforms." (<https://www.ajc.com/news/local-govt--politics/fulton-county-fire->

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- [department-becomes-city-south-fulton-monday/lwHGLMdqq4uds5gntHhgZl/](https://www.youtube.com/watch?v=HGLMdqq4uds5gntHhgZl/)). Even in a situation where the county fire department was going out of business, the new city didn't get the personal property for free.
- Cobb County has already stated they would reallocate the personnel and equipment in Police Precinct 4 and Fire Stations 15 and 21 to other parts of the county to offset planned purchases. This is confirmed by the revenues and expenses impact prepared by Cobb County.
 - Despite cityhood proponents' claims on social media and in town halls that the above feasibility study assumptions are true, Cobb County legal confirmed on the March 9, 2022 Cityhood Referendum Town Hall that only fire stations and parks are addressed in the current code, all else must be negotiated (https://youtu.be/W3H_EyThLoo, time 22:00).
 - The relevant Georgia Code covering the above points can be found in:
 - 2020 Georgia Code, Title 36 - Local Government, Chapter 31 - Incorporation of Municipal Corporations, § 36-31-11.1. Municipality Control Over Parks and Fire Stations (<https://law.justia.com/codes/georgia/2020/title-36/chapter-31/section-36-31-11-1/>). This code reference describes what is considered a fire station and provides the ability for a new city to purchase fire stations from the county for \$5000 each. Parks are also addressed in this code.
 - 2020 Georgia Code, Title 44 - Property, Chapter 1 - General Provisions, § 44-1-6. What Things Considered Fixtures; Movable Machinery as Personalty; Effect of Detachment From Realty (<https://law.justia.com/codes/georgia/2020/title-44/chapter-1/section-44-1-6/>). This code reference details what is considered "fixtures" vs. "personalty" (i.e., personal property), specifically defining machinery (i.e., fire trucks) as personalty and not fixtures.
 - The 2021 feasibility study also makes very aggressive assumptions on the ongoing cost of police and fire services. Specifically, the study used 5 cities as comparisons for the costs of the new city: Brookhaven, Dunwoody, Marietta, Smyrna, and Johns Creek, but Brookhaven and Dunwoody do not have fire departments (they rely on Dekalb County Fire). The table below shows the current spending per capita of each city, as well as the East Cobb proposed and Cobb County current, for police and fire.
 - For Police, the study lists a budget for the proposed police department at \$7.4M. The study assumed East Cobb would spend \$10-23 LESS per capita than the lowest comparison city (Smyrna), and \$153-166 LESS per capita than the highest (Marietta). The study projects East Cobb would spend \$17-40 MORE per capita than Cobb County. Increased spending would be

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expected given the loss of Cobb County’s economies of scale, but it also indicates increased expenses (i.e., taxes) for police services.

- For Fire, the study lists a budget for the proposed fire department at \$5.7M. Cobb County Fire and Emergency Services estimate the cost to cover the area totals nearly \$12.4M. The City of Marietta with a comparable population and geographical area lists a budget of nearly \$13.9M. Further, the study assumed East Cobb would spend between \$16 LESS and \$1 MORE per capita than the lowest comparison city (Smyrna), and \$116-133 LESS per capita than the highest (Marietta). Note Smyrna has an ISO 2 rating, while Marietta has an ISO 1 rating. How will East Cobb “continue tradition of excellent fire protection we experience today” and maintain our ISO 1 rating with the funding of an ISO 2 rating fire department that covers only 60% the geographic area (Smyrna 15.6 square miles vs. City of East Cobb 25+ square miles)? Also note Cobb County is more efficient than Marietta and Johns Creek, the latter of which is also ISO 2 rated.

City	Police \$ per capita	Fire \$ per capita
Brookhaven	\$211	---
Dunwoody	\$208	---
Marietta	\$299	\$229
Smyrna	\$156	\$112
Johns Creek	\$156	\$144
East Cobb Proposed (A)	\$146	\$113
East Cobb Proposed (B)	\$123	\$96
Cobb County Current	\$106	\$139

A – Assuming 50,406 East Cobb residents, per the Feasibility Study

B – Assuming 59,664 East Cobb residents, per recent cityhood proponent statements

- The 2021 feasibility study and legislation are also inconsistent with regard to Parks and Recreation. The 2021 feasibility study states P&R will be left with the county, while the current bill states P&R will be owned by the city. Consequentially, the 2021 feasibility study excludes costs to purchase and maintain existing parks from Cobb County per 2020 Georgia Code § 36-31-11.1. In addition, cityhood proponents have publicly stated they have no plans to offer additional parks.
- The 2021 feasibility study notes that East Cobb will be required to maintain roads within the city per 2020 Georgia Code § 36-31-7.1 (<https://law.justia.com/codes/georgia/2020/title-36/chapter-31/section-36-31-7-1/>), and estimates the cost of road maintenance to be \$6.6M, but the feasibility study omits this cost and suggests this expense will stay with Cobb County. Even if road maintenance is performed by Cobb County, wouldn’t East Cobb be required to reimburse Cobb County for it? Note all cities within Cobb County maintain their

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own roads (<https://www.cobbcounty.org/transportation/roadway-maintenance>).

Also, if East Cobb does not maintain its roads and rights-of-way, the city will not be able to charge franchise fees in the feasibility study. The right to charge franchise fees is provided to the authority that maintains the road and right-of-way. The \$3m surplus in the 2019 feasibility study would be limited with this one item.

- The 2021 feasibility study also omits other certain costs such as city vehicles for multiple departments, city court and jail (where would the jail be located?), retirement plans for city employees, etc.
- Cityhood proponents often quote year 1 metrics of new cities to highlight their success. However, they also admit nothing really happens in year 1, all the major services are on transition services agreements with the county. It's in years 2 and 3 that new cities begin spending, as was the case noted above with the cities of Sandy Springs, Milton and Johns Creek, all of which bought new police and fire equipment in years 2 and 3 after incorporation. However, comparing prior city feasibility studies to actual city revenues and expenditures a few years later, it is clear that cities always overspend their feasibility studies, significantly. I compared the projected revenues and expenses in the feasibility studies for the 10 cities launched in Georgia since 2005 (obtain via Open Records Requests to UGA and GSU) to the FY22 approved budgets for each city (obtained from various city websites). In summary:

- Every city feasibility study forecasted a revenue surplus, except Milton.
- For cities launched more than 10 years ago (5 cities), their revenues range from 74% to 259% GREATER than their revenue forecasted in their feasibility study. In other words, they are taking in 74-259% more taxes, fees, fines, etc. than projected.
- For those same cities, their expenses range from 94% to 198% GREATER than their expenses forecasted in their feasibility study. In short, they are spending a lot more money on various city services.
- For cities launched in the last 10 years (5 cities), their revenues range from 41% to 355% GREATER than their revenue forecasted in their feasibility study, with an average of 105% GREATER (over 2x more, with Peachtree Corners eliminated as an extremely high outlier).
- For those same cities, their expenses range from 93% to 1663% GREATER than the expenses forecasted in their feasibility study, with an average of 145% GREATER (nearly 2.5x more, again with Peachtree Corners eliminated as an extremely high outlier).
- Peachtree Corners first annual expense budget was nearly 3x what residents were promised in their feasibility study. In the 10 years since, the city's expense budget has grown to nearly 17x their feasibility study

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(<https://www.ajc.com/news/local/peachtree-corners-first-proposed-budget-larger-than-projected/XFVqHk0CngSQQBT27b1ALO/>).

- If we look at just the cities incorporated in the last 5 years, South Fulton and Stonecrest, their budgeted revenues average 88% (1.9x) GREATER than the revenues forecasted in their feasibility study, and their budgeted expenses average 144% (2.4x) GREATER than the expenses forecasted in their feasibility study. This growth occurred in ONLY 5 YEARS.
 - While revenues and expenses would be expected to increase with population and inflation, 13% annual growth in revenues and 19% annual growth in expenses seems excessive (average of South Fulton and Stonecrest). It's more likely the expenses of these cities were (also) underestimated, requiring the city leaders to find new sources of revenue from more dense residential and commercial development, because these generate much higher tax revenues than low density residential, of which East Cobb is over 90% today.
 - See Georgia Cityhood Financial Analysis v2 at <https://drive.google.com/file/d/1QSoWIDfYuYLYnm0floWSKypjzgxupKt/view?usp=sharing> for details.
 - Bottom line, the city is going to be a lot more expensive than forecasted in the feasibility study, meaning increased taxes and fees to citizens and local businesses, and most likely the dense residential and commercial development that cityhood proponents say they oppose.
- d. Cobb County has not completed a full impact assessment or agreed to major assumptions contained in the 2021 feasibility study.
- Multiple city proposals (four) have been introduced to the Georgia House simultaneously, making it difficult (impossible) for the county to respond with a financial impact analysis. See the following for additional information: <https://eastcobbnews.com/cupid-speaks-out-on-cobb-cityhood-bills-local-redistricting/>.
 - Cobb County released on Friday, February 11 a preliminary summary of the revenue impact from all four cityhood movements, including East Cobb. Before accounting for acquisition of police and fire equipment located at each of the sites (assuming Cobb County Police and Fire decide to sell some of or all those items vs. redeploy them to other areas, the later was suggested on the Cityhood Referendum Town Hall) and potential reductions in personnel budgets in Parks and Public Safety, the net impact (revenues less cost reductions) of all four cities is \$37.2 million, \$22.7 million for East Cobb alone. Cobb County will not be able to “eat” this loss, rather they will adjust other income sources to recoup it. See the Cityhood Referendum Town Hall (https://youtu.be/W3H_EyThLoo, time 2:55) and the following for more

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information: <https://eastcobbnews.com/cobb-government-cityhood-advocates-ramp-up-talking-points/>.

- There has been no analysis or consideration of the impact to residents outside the proposed city limits that are served by county services assumed to be transferred to the new city. For example, Cobb County Police Precinct 4 serves ~190,000 Cobb County residents, but there are only ~60,000 residences in the new city. If the new city takes Precinct 4, how will the remaining ~130,000 residents be served? What is the cost to build a new police precinct to serve those residents?
- e. The city of East Cobb will result in additional taxes for residents.
- Sections d. and e. immediately above highlight why East Cobb will need more funding than projected in the 2021 feasibility study. Experts with years of experience in operating city and county governments suggest the City of East Cobb would require at least 5 mills (or more) of additional property taxes to fund the proposed services.
 - HB841 contains specific language giving the city taxation power without having a vote of the residents. Some specifics:
 - Ad valorem taxes. To levy and provide for the assessment, valuation, revaluation, and collection of taxes on all property subject to taxation subject to a maximum of 1 mill. This would immediately add 3.3% to your property tax bill.
 - Other taxes. To levy and collect such other taxes as may be allowed now or in the future by law.
 - The city council by ordinance shall have the power to levy occupation or business taxes as are not denied by law.
 - The 2021 feasibility study specifically calls out franchise fees on electricity, gas, cable, and phone. See <https://eastcobballiance.com/2022-cityhood-analysis/franchise-fees/> for a detailed analysis. This means these service providers would collect fees on behalf of the city, i.e., your bills for these services will increase. In addition, businesses operating in the new city would receive the same franchise fees and likely pass along the additional costs to their customers.
 - The 2021 feasibility study calls out a number of other income sources, almost all coming from the residents or businesses in the new city. This will increase the cost of living and doing business in the new city.
 - The 2021 feasibility study and HB841 presently do not mention any additional sales tax. However, during their webinar on Thursday, February 10, the cityhood committee said they were required by law to add back police and fire into HB841 (see “What is the current legislation?” above), but this is not accurate.
 - According to the 1983 Georgia Constitution, a municipality is required to maintain 3 of a list of 15 services in order to maintain cityhood

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(<https://www.georgiaencyclopedia.org/articles/government-politics/municipal-services/>).

- However, HB841 already contained 3 planned services that would qualify East Cobb to be a city without police and fire, specifically:
 - Parks, recreational areas, programs, and facilities;
 - Codes, including building, housing, plumbing, and electrical; and
 - Planning, zoning, and community redevelopment.
- So, why add back police and fire? It could be that without police and fire, East Cobb would not be a “Qualified Municipality” with the ability to levy sales tax. Georgia Code § 48-8-80 requires that a municipality offer 3 of 6 services (water, sewer, garbage collection, police, fire, library) in order to be a Qualified Municipality that can levy a sales tax (<https://law.justia.com/codes/georgia/2020/title-48/chapter-8/article-2/section-48-8-80/>). Water and sewer would be astronomically expensive and therefore were obviously out, but with police and fire, add a library or garbage collection and East Cobb could potentially levy a sales tax.
- Comparing total millage rates for Unincorporated Cobb and all cities in Cobb, one can will see Unincorporated Cobb has the lowest total property tax rate, all other cities in Cobb County pay higher property taxes than Unincorporated Cobb (i.e., East Cobb). It would be reasonable to assume the city of East Cobb will pay higher property taxes, especially considering the scale of East Cobb and the services to be provided as compared to other Cobb cities. See 2021 Cobb County Millage Rates at https://drive.google.com/file/d/1-eQlqfT8ld9aqpCcaBYBqe_4VrYbLby9/view?usp=sharing. Further analysis of current Cobb cities’ millage rates shows:
 - The 2021 feasibility study suggests East Cobb will operate on 2.86 mils of property tax (by diverting Cobb County Fire Fund to the city of East Cobb).
 - Current Cobb city millage rates range from 3.25 (Austell) to 27.962 (Marietta CID). Other Cobb cities include Acworth, Kennesaw, Powder Springs, and Smyrna.
 - Austell has a population of <8,000 and receives 58% of city revenue from franchise fees on natural gas. Austell Natural Gas System provides natural gas services to residential, commercial, and industrial customers in the cities of Austell, Douglasville, and Powder Springs, and in portions of Cobb and Douglas Counties. Austell is not comparable to East Cobb given these characteristics.
 - Marietta provides their own independent school system, which results in a dramatically higher millage rate (17.97-22.97 mils for school specifically), making Marietta not comparable to East Cobb.

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- Cities more comparable to East Cobb, specifically Acworth, Kennesaw, Powder Springs, and Smyrna, operate on 8.95-9.50 mills.
 - Smyrna (8.99 mills) provides police, fire, and E911 services, and Smyrna Fire Department is ISO 2 rated vs. Cobb County’s ISO 1 rating as noted previously. Note Smyrna was one of the five cities used as comparison to East Cobb in the 2021 feasibility study.
 - Acworth (8.95 mills) and Kennesaw (9.50 mills) provide police services but rely on Cobb County Fire for fire. They share an E911 dispatch center.
 - Powder Springs (9.50 mills) provide police services but relies on Cobb County Fire for fire and E911 services.
 - If comparable Cobb cities require 8.95-9.50 mills, how is East Cobb going to operate on 2.86 mills yet provide these “heavyweight” services such as police, fire, and E911?
 - Note all cities pay the same millage rate for “County General” and “County Bond”, so the new city should expect to pay those as well, and these charges would likely be increased in the next few years to cover the shortfall in tax revenue currently received by the county from East Cobb and other new Cobb cities. See “Cobb County has not completed a full impact assessment or agreed to major assumptions contained in the 2021 feasibility study” above.
 - Other Georgia cities launched since 2005 are raising property tax millage rates and increasing property values as a way to increase tax revenues:
 - <https://www.capegazette.com/article/milton-council-approves-tax-increase/208590>
 - <https://www.newskudo.com/georgia/emerson/government/2743111-milton-sets-2022-property-tax-rate>
 - <https://www.ajc.com/news/atlanta-news/sandy-springs-homeowners-will-see-property-tax-increase/IGAE0F32ANEDNO25MX2ISLGOFA/>
- f. Governance provisions of the proposed city are atypical and irrational.*
- While cityhood proponents state a primary benefit of the new city will be local representation, and the council members (2) from each district (3 districts) must live in their district, all council members are elected citywide at large (HB841 Section 2.11.c, Lines 209-211). This means voters from outside your district can elect the council members for our district.
 - The proposed city charter calls for abstention votes by council members to be counted as affirmative votes (HB841 Section 2.20, Lines 386-387). This means that a rezoning request for which 1 council member votes yes, 3 council members vote no, and 3 council members abstain, would pass 4-3. In other words, any city council

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member who has a conflict of interest in the matter under consideration can abstain, and have their abstention counted as a yes vote. This provision exists in no other Georgia city today.

- The “city lite” model proposed by the new city charter (and those of Lost Mountain and Vinings) may be unconstitutional because they limit the powers of these cities. Suits have been filed against all three proposed new cities. See https://www.mdjonline.com/opinion/dora-locklear-cityhood-referendums/article_baea064c-c0ea-11ec-a189-0b65d65db090.html for additional information.

g. Boundaries of the proposed city are not rational.

- As noted in the legislation overview, the proposed boundaries of the new city have changed to a subset of East Cobb residents (~60,000).
- The revised boundaries of the new city seem to follow voting blocks from the 2020 election, suggesting manipulation to improve chances the legislation will be approved. See “Why do proponents want to create a new City of East Cobb? above re: initial motivation for the cityhood initiative.
- Some nearby communities have been left conspicuously outside the new city, putting them at a disadvantage for public safety services (i.e., police department coverage for the remainder of Precinct 4, fire department response time from a fire station outside the city, etc.). City boundaries should be drawn thoughtfully and not capriciously.
- While the Proposed City of East Cobb represents 25+ square miles, over 3x that area remains in Unincorporated East Cobb (79.1 square miles). Are these areas any less “East Cobb” than the area proposed for the new city? See https://drive.google.com/file/d/1km-eHqPR0cqPGrkS_p4_Wo0xQSiHe9yn/view?usp=sharing for a map of the proposed city vs. entire East Cobb.

h. The cityhood initiative lacks transparency, which suggests the proponents have something to hide.

- Matt Dollar would not respond to questions from his constituents about the bill before he resigned. I personally emailed and called him 5+ times each with no response. Numerous people on social media report the same.
- There were no public reviews of the legislation, and limited town hall meetings (the only ones held by city proponents that were not widely announced) before the legislation was approved.
- During the House approval process, the voting date for HB841 was moved up from November 2022 to May 2022 (<https://eastcobbnews.com/revised-east-cobb-cityhood-bill-moves-up-referendum-to-may/>), when we know from prior history

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that will see low voter turnout. There is not enough time for voters to become aware of and fully understand this issue. As a comparison, the timeline for the City of Milton (HB1470) was nearly two years from the point the legislation was introduced for public review until incorporation of the city (<https://www.cityofmiltonga.us/residents/about-milton/>):

- Jan 2005 – State Rep. Jan Jones introduced the bill for the City of Milton for public review in January 2005 with the intent of moving the bill forward in January 2006.
 - Mar 2006 – The bill resoundingly passed both in the Georgia House of Representatives (127-21) and in the Senate (49-0). Governor Sonny Perdue signed into law.
 - Jun 2006 – Voters approved the referendum to create the City of Milton by an 85% majority.
 - Nov 2006 – The City's first general election for Mayor and City Council was held.
 - Dec 2006 - The City was incorporated.
- The lack of transparency is not limited to members of the Georgia legislature, in fact the cityhood committee has been accused of the same. See the link below to a December 2018 Marietta Daily Journal article highlighting that one of the committee members stepped down due to transparency concerns (https://www.mdjonline.com/news/east-cobb-resident-cites-secrecy-for-his-departure-from-cityhood-committee/article_d2c29234-03e2-11e9-82e0-6f7ac029241b.html).
 - My own experience attending the Cityhood Committee webinar on February 10 highlights this lack of transparency. Webinar participants were required to register in advance, and then received an individualized link to attend (so they know who you are). The moderator avoided any difficult questions, as well as questions from specific people entirely. In fact, I asked several questions that were never addressed (many of which are contained in this paper), even though I copied/pasted them over and over into the webinar feed. In general, cityhood arguments are very high level and vague primarily intended to create fear and distrust.
 - After it became widely known that the initial 2018 feasibility study was funded at least partially by a real estate developer, the proponents of cityhood incorporated as a 501c3/4, allowing them to keep their financials secret. They will not publish complete financial records with donations and expenditures, which could represent a Georgia Finance Campaign Ethics violation according to Georgia Code § 21-5-34. (<https://law.justia.com/codes/georgia/2020/title-21/chapter-5/article-2/section-21-5-34/>). We know the expenditures total at least \$200,000+ at this point (two feasibility studies, \$36,000 for the 2018 version, \$20,000 for the 2021 version, \$50,000+ for lobbyists – see section below, and most recently, ~\$100,000 for the

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glossy “voter’s guide” mailed to thousands of households). How much has really been spent and who is funding it?

- See the following link for additional information on concerns with the transparency of the cityhood initiative: <https://eastcobballiance.com/2022-cityhood-analysis/cityhood-swindle/>

i. The cityhood initiative is backed by real estate developers, which suggests a conflict of interest.

- The backers of East Cobb cityhood include three real estate developers. This was confirmed by the cityhood proponents during a public interview in March, 2021 (<https://eastcobbnews.com/breaking-news-east-cobb-cityhood-effort-revived-new-services-proposee/>). All of these developers have been moved into the background, yet evidence suggests that they may be still involved.
 - David Birdwell, a retired real estate executive that was involved in a \$75 million real estate development deal in 2008 (<https://www.bizjournals.com/atlanta/stories/2008/09/01/story3.html>), was named the “de facto face” of the committee by the Marietta Daily Journal in November 2019 (https://www.mdjonline.com/news/east-cobb-cityhood-group-releases-leaders-names/article_fc57e404-07de-11ea-aa36-4ff95ee22de7.html).
 - Owen Brown, owner of Retail Planning Corp (<https://www.retailplanningcorp.com>).
 - Mitch Rhoden, CEO of Futren Hospitality (<https://www.futren.com/>) that also manages Indian Hills Country Club.
- The initial 2018 feasibility study was commissioned by Representative Sharon Cooper (who does not live within the proposed city limits) and funded (~\$36,000) by the cityhood committee including Mr. Brown, who made a “sizable” contribution according to the cityhood committee. See now removed excerpt from the cityhood website FAQ (<https://eastcobballiance.com/wp-content/uploads/2019/07/PCEC-FAQ-OwenBrown-36000.jpg>). In fact, Mr. Brown also signed the two checks that paid for the 2018 feasibility study (<https://eastcobballiance.com/wp-content/uploads/2019/07/ECCityhood-36000-Checks.jpg>), showing that Mr. Brown had (and perhaps still has) signature authority on the bank account for the “Committee for Cityhood in East Cobb”.
 - Mr. Brown’s Retail Planning Corp, based in East Cobb, currently manages three properties within the boundaries of the proposed city of East Cobb:
 - <https://www.retailplanningcorp.com/listings/paper-mill-village/>
 - <https://www.retailplanningcorp.com/listings/woodlawn-point/>
 - <https://www.retailplanningcorp.com/listings/woodlawn-square/>

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- Mr. Brown reports to be a resident of East Cobb, yet he has a homestead exemption on his home in Ponte Vedra Beach, Florida (<https://qpublic.schneidercorp.com/Application.aspx?AppID=960&LayerID=21179&PageTypeID=4&PageID=9059&Q=1413494403&KeyValue=0661600010>). This means Mr. Brown is officially a resident of Florida, and most likely votes in Florida as well.
 - See the following link for additional information on Mr. Brown and his role in the cityhood initiative: <https://politicalvine.com/who-is-g-owen-brown-why-does-he-want-to-incorporate-east-cobb-part-1/>.
 - The cityhood initiative has employed at least five lobbyists at the cost of \$50,000+ (https://media.ethics.ga.gov/search/Lobbyist/Lobbyist_Groupsearchresults.aspx?Year=2006%20and%20Newer&GroupName=&GroupNameContains=CITYHOOD%20IN%20EAST%20COBB). Some of these lobbyists are active on social media in February and March 2022 swaying favor for the new city.
 - Note that three of the lobbyists in the above report list the same address as Retail Planning Corp, Mr. Brown’s business, suggesting they work closely with and were perhaps funded by Mr. Brown.
 - One must ask... why would these developers spend this much money if they were not expecting to be able to develop additional properties in East Cobb? Isn’t this exactly what the proponents of the new city are against? Or maybe, these developers are trying to block competition from other larger, better funded developers? Either way, developer sponsorship creates a conflict of interest.
 - See the following link for additional information on backers of the proposed cityhood initiative: <https://eastcobballiance.com/2022-cityhood-analysis/cityhood-backers/>.
- j. Finally, members of the State House and Cobb County Commission have expressed concerns with HB841.
- Representative Don Parsons (R) from Marietta stated:
 - “This is something that has been proposed by a group of people who want a city and want to be on the city council, and maybe want to be mayor or something for themselves,” Parsons said. “This is not a group of people who’ve come together and built a city or town. If that were the case, it would be there. There is no town of East Cobb. There is no city of East Cobb waiting to be incorporated.”
 - Parsons further characterized the city as “artificial and planned by people who want to run for city council or Mayor”, he stated. "(He)... has concerns about the May referendum", he noted. "The group that has been behind this, they have now had 3 to 4 years organizing. They have money. They know how to run a campaign. The people who are opposed to this, they

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don't have any of that, with an election in May. They have the resources to get this thing through. The people who are opposed and have various problems with it, they're not organized. So how do you think it's going to go?"

- See the following link for additional information:
https://www.mdjonline.com/news/frontpage/georgia-house-passes-east-cobb-cityhood-bill/article_f0dc715e-7f81-11ec-a19d-6bf7c4c41881.html

- Representative Teri Anulewicz (D) from Smyrna stated, “Such a profound change to the city structure happened quickly and with so little input and evaluation from the public, this bill has been very difficult for the public to follow along with at home, with numerous committee substitutes”. She went on to say, “Now the election date is set for the May primary not the November general election as was originally set”. She questioned whether voters would have full knowledge by spring. “The proponents of the bill set the election for a time when, in all likelihood and reality, very few people will turn out.”
- Cobb County Commissioner Chair Lisa Cupid stated concerns whether the public had access to all the information about the incorporation plans. She stated, “there have been questions from citizens about how the information is being shared, because based off how those who are starting this process decided to meet and share this information”. “There have been some changes that have been shared in the legislative committee that weren’t necessarily shared with the public in their feasibility studies that they shared, so there has been some concern, and reasonably so.”
- See the following links for additional concerns expressed with the House passing of HB841:
 - <https://capitol-beat.org/2022/01/east-cobb-cityhood-bill-clears-legislative-chamber/>
 - <https://georgiarecorder.com/2022/01/13/east-cobb-first-out-of-the-gate-in-georgia-legislatures-2022-cityhood-charge/>

6. If you oppose the cityhood initiative based on the above or other information, what should you do?

- a. Get the word out. Forward this paper to your neighbors and friends to make them aware.
- b. Mark your calendar to vote NO for HB841 in the May 24, 2022 Primary Election.

**Response to HB841, Proposed City of East Cobb
Version 8 – April 24, 2022**

Prepared by:
Robert Lax
Marietta, GA 30068

7. Whether you agree with or oppose the cityhood initiative, please get involved.

- a. Cityhood proponents and opponents agree we want to limit dense development in East Cobb.
- b. Sign up for updates on the Cobb County Comprehensive Plan on the Cobb County Planning website (https://mailchi.mp/cobbcounty/2040_plan), and make your voice heard!