



**Plain City  
Parks, Recreation, Trails and Open  
Space Impact Fee Analysis**

**DRAFT**

ZIONS  PUBLIC FINANCE, INC.

March 14, 2018



## Table of Contents

Table of Contents.....	2
Summary of Impact Fee Analysis (IFA) .....	3
Impact on Consumption of Existing Capacity - Utah Code 11-36a-304(1)(a) .....	3
Impact on System Improvements by Anticipated Development Activity - Utah Code 11-36a-304(1)(b) .....	4
Relationship of Anticipated Impacts to Anticipated Development Activity - Utah Code 11-36a-304(1)(c) .....	4
Proportionate Share Analysis - Utah Code 11-36a-304(1)(d)(i)(ii).....	4
Manner of Financing - Utah Code 11-36a-304(2)(c)(d)(e)(f)(g)(h).....	5
Utah Code 11-36a .....	6
Impact Fee Analysis .....	8
Impact on Consumption of Existing Capacity .....	8
Demand Placed on Facilities by New Development Activity .....	8
Impact on System Improvements by Anticipated Development .....	10
Activity .....	10
Relationship of Anticipated Impacts to Anticipated Development .....	11
Activity .....	11
Proportionate Share Analysis .....	11
Costs Reasonably Related to New Development Activity.....	11
Impact Fee Credits.....	13
Manner of Financing.....	13
Certification .....	14

## Summary of Impact Fee Analysis (IFA)

Plain City (“City”) has completed a Parks, Recreation and Trails Impact Fee Facilities Plan. This plan, along with updated input from the City, form the basis for this Impact Fee Analysis (IFA) for Parks, Trails and Recreation.

The City has determined that there is one service area citywide and that there is no excess capacity in any of its parks, trails or recreation facilities. Only residential development is considered to create demand for parks, trails and recreation facilities and therefore only residential growth has been considered in the determination of impact fees.

Projections for population growth in Plain City are as follows:

TABLE 1: PROJECTED POPULATION GROWTH, 2018-2027

Year	Population
2018	7,232
2019	7,556
2020	7,895
2021	8,309
2022	8,745
2023	9,204
2024	9,687
2025	10,195
2026	10,730
2027	11,295

Source: Utah Governor’s Office of Management and Budget; Plain City

This IFA is organized based on the legal requirements of Utah Code 11-36a-304.

### Impact on Consumption of Existing Capacity - Utah Code 11-36a-304(1)(a)

The IFFP considers only *system* facilities in the calculation of impact fees. For the City, this has been determined to mean community and regional parks and trail systems. Local parks and trails are considered *project* improvements and have not been included in the calculation of impact fees.

Existing service levels are based on the (2018) levels of service in the City.

TABLE 2: EXISTING AND PROPOSED SERVICE LEVELS

Service Levels	Existing	Proposed	Excess Capacity	Existing	Proposed	Excess Capacity
Land - acres per 1,000 persons; cost per capita	3.77	3.77	0	\$188.74	\$188.74	\$0.00
Improvements - cost per capita				\$221.68	\$221.68	\$0.00

Service Levels	Existing	Proposed	Excess Capacity	Existing	Proposed	Excess Capacity
Mowed Acres - acres per 1,000 persons; cost per capita	1.90	1.90	0	\$133.34	\$133.34	\$0.00
Asphalt Surfaces - sf per capita; cost per capita	17.00	17.00	0	\$48.96	\$48.96	\$0.00

### Impact on System Improvements by Anticipated Development Activity - Utah Code 11-36a-304(1)(b)

The table below shows the declining service levels that would occur in Plain City, due to population growth, if no new facilities are added. Each of these declining service levels is discussed in more detail in the body of this report.

TABLE 3: IMPACTS TO SERVICE LEVELS DUE TO NEW DEVELOPMENT IF NO IMPROVEMENTS ARE MADE

SERVICE LEVELS	UNITS		COST	
	2017	2026	2017	2026
<b>Park Facilities</b>				
Land (acres per 1,000 population; cost per capita)	3.77	2.42	\$188.74	\$120.85
Park Improvements (cost per capita)			\$221.68	\$141.94
Park Mowed Acres (acres per 1,000 population; cost per capita)	1.90	1.22	\$133.34	\$85.37
Park Parking (asphalt sf per capita; cost per capita)	17.00	10.89	\$48.96	\$31.35

### Relationship of Anticipated Impacts to Anticipated Development Activity - Utah Code 11-36a-304(1)(c)

The demand placed on existing public park facilities by new development activity is attributable to population growth. Plain City has a 2018 population of 7,232 persons and as a result of anticipated development activity will grow to a projected 11,295 persons by 2027 – an increase of 4,063 persons. As growth occurs as a result of increased development activity, more parks and trails are needed to maintain existing service levels.

### Proportionate Share Analysis - Utah Code 11-36a-304(1)(d)(i)(ii)

#### Costs Reasonably Related to New Development Activity

The cost of new system improvements required to maintain the service levels related to new development activity is based on the costs of system-wide facilities, and the consultant fees for the preparation of the Impact Fee Facilities Plan and the Impact Fee Analysis.

The total gross fee is \$564.80 per capita. However, the actual fee charged will be based on the average household size of a residential unit.

TABLE 4: CALCULATION OF GROSS IMPACT FEE

Summary of Gross Fee	Amount
Land	\$188.74

<b>Summary of Gross Fee</b>	<b>Amount</b>
Park Improvements	\$221.68
Mowed Acres	\$133.34
Asphalt Surface	\$48.96
Consultant Costs	\$1.60
Impact Fee Fund Balance	(\$29.52)
<b>Fee per Capita</b>	<b>\$564.80</b>

The City may choose to either charge one fee for every type of residential unit, or it can charge different fees for single-family and multi-family units. The household sizes for residential units in Plain City is as follows:

TABLE 5: AVERAGE HOUSEHOLD SIZE

<b>Residential Unit Type</b>	<b>Household Size</b>
All Residential Units	3.40
Single-Family Units	3.41
Multi-Family Units	3.27

Source: American Factfinder Community Survey; <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>

The maximum impact fee is calculated by multiplying the household size by the fee per capita.

TABLE 6: MAXIMUM IMPACT FEE

<b>Residential Unit Type</b>	<b>Maximum Impact Fee</b>
Household Size	\$1,920.32
Single-Family HH Size	<b>\$1,925.97</b>
Multi-Family HH Size	<b>\$1,846.90</b>

### **Manner of Financing - Utah Code 11-36a-304(2)(c)(d)(e)(f)(g)(h)**

An impact fee is a one-time fee that is implemented by a local government on new development to help fund and pay for all or a portion of the costs of public facilities that are needed to serve new development. Additionally, impact fees allow new growth to share in the cost of existing facilities that have excess capacity.

#### **Impact Fee Credits**

The Impact Fees Act requires credits to be paid back to development for future fees that may be paid to fund system improvements found in the IFFP so that new development is not charged twice. Plain City does not have any outstanding debt for parks, recreation and trails.

#### **Extraordinary Costs and Time Price Differential**

It is not anticipated that there will be any extraordinary costs in servicing newly-developed park properties.

## Utah Code 11-36a

---

**Preparation of Impact Fee Analysis.** Utah Code requires that “each local political subdivision... intending to impose an impact fee shall prepare a written analysis (Impact Fee Analysis or IFA) of each impact fee” (Utah Code 11-36a-303). This IFA follows all legal requirements as outlined below. The City has retained Zions Public Finance, Inc. (ZPFI) to prepare this Impact Fee Analysis in accordance with legal requirements.

Section 11-36a-304 of the Utah Code outlines the requirements of an impact fee analysis which is required to identify the following:

- anticipated impact on or consumption of any existing capacity of a public facility by the anticipated development activity;

- anticipated impact on system improvements required by the anticipated development activity to maintain the established level of service for each public facility;

- how anticipated impacts are reasonably related to the anticipated development activity

- the proportionate share of:

  - costs for existing capacity that will be recouped; and

  - costs of impacts on system improvement that are reasonably related to the new development activity; and

  - how the impact fee was calculated

Further, in analyzing whether or not the proportionate share of the costs of public facilities are reasonably related to the new development activity, the local political subdivision or private entity, as the case may be, shall identify, if applicable:

- the cost of each existing public facility that has excess capacity to serve the anticipated development resulting from the new development activity;

- the cost of system improvements for each public facility;

- other than impact fees, the manner of financing for each public facility such as user charges, special assessments, bonded indebtedness, general taxes, or federal grants;

- the relative extent to which development activity will contribute to financing the excess capacity of and system improvements for each existing public facility, by means such as user charges, special assessments, or payment from the proceeds of general taxes;

- the relative extent to which development activity will contribute to the cost of existing public facilities and system improvements in the future;

the extent to which the development activity is entitled to a credit against impact fees because the development activity will dedicate system improvements or public facilities that will offset the demand for system improvements, inside or outside the proposed development;

extraordinary costs, if any in servicing the newly developed properties; and

the time-price differential inherent in fair comparisons of amounts paid at different times.

**Calculating Impact Fees.** Utah Code 11-36a-305 states that for purposes of calculating an impact fee, a local political subdivision or private entity may include the following:

construction contract price;

cost of acquiring land, improvements, materials, and fixtures;

cost for planning, surveying, and engineering fees for services provided for and directly related to the construction of the system improvements; and

for a political subdivision, debt service charges if the political subdivision might use impact fees as a revenue stream to pay the principal and interest on bonds, notes or other obligations issued to finance the costs of the system improvements.

Additionally, the Code states that each political subdivision or private entity shall base impact fee amounts on realistic estimates and the assumptions underlying those estimates shall be disclosed in the impact fee analysis.

**Certification of Impact Fee Analysis.** Utah Code 11-36a-306 states that an impact fee analysis shall include a written certification from the person or entity that prepares the impact fee analysis. This certification is included at the conclusion of this analysis.

**Impact Fee Enactment.** Utah Code 11-36a-202 states that a local political subdivision or private entity wishing to impose impact fees shall pass an impact fee enactment in accordance with Section 11-36a-402. Additionally, an impact fee imposed by an impact fee enactment may not exceed the highest fee justified by the impact fee analysts. An impact fee enactment may not take effect until 90 days after the day on which the impact fee enactment is approved.

**Notice of Intent to Prepare Impact Fee Analysis.** A local political subdivision must provide written notice of its intent to prepare an IFA before preparing the Analysis (Utah Code 11-36a-503(1)). This notice must be posted on the Utah Public Notice website. The City has complied with this noticing requirement for the IFA by posting notice.

## Impact Fee Analysis

Utah Code allows cities to include only system-wide parks for the purpose of calculating impact fees. Project-wide parks cannot be used to establish levels of service eligible to be maintained through impact fees. Based on input from the City and the consultants, a system-wide park is defined as a park that serves more than one local development area.

This IFA is organized based on the legal requirements of Utah Code 11-36a-304.

### 1 Impact on Consumption of Existing Capacity

*Utah Code 11-36a-304(1)(a): an impact fee analysis shall identify the anticipated impact on or consumption of any existing capacity of a public facility by the anticipated development activity*

#### Demand Placed on Facilities by New Development Activity

**Park Land.** Existing park service levels will decline, due to new development activity, from the existing service level of \$188.74 per capita to \$120.85 per capita by 2027.

Table 7: Park Land Service Level Impacts from New Development Activity, 2018-2027

Year	Population	Service Levels If No New Facilities	Cost Service Levels If No New Facilities
2018	7,232	3.77	\$188.74
2019	7,556	3.61	\$180.65
2020	7,895	3.46	\$172.89
2021	8,309	3.29	\$164.28
2022	8,745	3.12	\$156.09
2023	9,204	2.97	\$148.31
2024	9,687	2.82	\$140.91
2025	10,195	2.68	\$133.89
2026	10,730	2.54	\$127.21
2027	11,295	2.42	\$120.85

**Park Improvements.** Park improvement levels will decline, due to new development activity, from the existing service level of \$221.68 per capita to \$141.94 per capita by 2027, if no new improvements are made.

Table 8: Park Improvement Service Level Impacts from New Development Activity, 2018-2027

Year	Population	Population Growth	Cost Service Levels If No New Facilities
2018	7,232	-	\$221.68
2019	7,556	324	\$212.17



Year	Population	Population Growth	Cost Service Levels If No New Facilities
2020	7,895	339	\$203.06
2021	8,309	414	\$192.94
2022	8,745	436	\$183.32
2023	9,204	459	\$174.18
2024	9,687	483	\$165.50
2025	10,195	508	\$157.25
2026	10,730	535	\$149.41
2027	11,295	565	\$141.94
<b>TOTAL</b>		<b>4,063</b>	

**Park Mowed Acres.** The existing level of service of \$133.34 per capita will decline to \$85.37 per capita, if no new improvements are made.

**Table 9: Park Mowed Acre Service Level Impacts from New Development Activity, 2018-2027**

Year	Population	Unit Service Levels If No New Facilities	Cost Service Levels If No New Facilities
2018	7,232	1.90	\$133.34
2019	7,556	1.82	\$127.62
2020	7,895	1.74	\$122.14
2021	8,309	1.65	\$116.06
2022	8,745	1.57	\$110.27
2023	9,204	1.49	\$104.77
2024	9,687	1.42	\$99.55
2025	10,195	1.35	\$94.59
2026	10,730	1.28	\$89.87
2027	11,295	1.22	\$85.37

**Parking Areas.** The existing level of service of \$48.96 per capita will decline to \$31.35 per capita, if no new improvements are made.

**Table 10: Parking Asphalt Service Level Impacts from New Development Activity, 2018-2027**

Year	Population	Unit Service Levels If No New Facilities	Cost Service Levels If No New Facilities
2018	7,232	17.00	\$48.96
2019	7,556	16.27	\$46.86
2020	7,895	15.57	\$44.85
2021	8,309	14.80	\$42.62
2022	8,745	14.06	\$40.49
2023	9,204	13.36	\$38.47
2024	9,687	12.69	\$36.55
2025	10,195	12.06	\$34.73

Year	Population	Unit Service Levels If No New Facilities	Cost Service Levels If No New Facilities
2026	10,730	11.46	\$33.00
2027	11,295	10.89	\$31.35

## 2 Impact on System Improvements by Anticipated Development Activity

*Utah Code 11-36a-304(1)(b): an impact fee analysis shall identify the anticipated impact on system improvements required by the anticipated development activity to maintain the established level of service for each public facility;*

The City will need to acquire additional park lands and improvements to maintain its existing and proposed service levels. Service levels will decline, as a result of population growth unless new facilities are constructed or acquired. Impact fees will be used to maintain the existing service levels for parks and trails.

The figures in the following table were calculated by multiplying the existing service levels by the cost for each line item by the projected growth in demand over the next ten years. For example, with a park land service level of 3.77 acres per 1,000 persons, and anticipated growth of 4,063 persons, Plain City will need an additional 15.34 acres of park land. At a cost of \$50,000 per acre, this results in a total anticipated cost of \$766,868.78 over the next ten years.<sup>1</sup>

Table 11: Cost of New Construction Due to New Growth, 2018-2027

	Current Service Level	Facilities Needed in 10 Years	Cost per Unit	Total Improvement Cost Needed Over 10 Years
<b>Acres</b>				
Park Land - per 1,000 population	3.77	15.34	\$50,000	\$766,868.78
Mowed - per 1,000 population	1.90	7.72	\$70,131.60	\$541,757.40
<b>Square Feet</b>				
Parking Areas - per capita	17.00	69,074.37	\$2.88	\$198,934.19
<b>Cost per Capita</b>				

<sup>1</sup> **Park improvement costs** are calculated as follows: Current park improvements value (\$1,603,160) divided by the 2018 population for a cost of \$221.68 per capita. This is then multiplied by the projected growth of 4,063 persons to arrive at a cost of \$900,669.12 for park improvements over the next 10 years.

**Mowed acre costs** are calculated as follows: Current mowed acres (13.75) are divided by the 2018 population, divided by 1,000, for a LOS of 1.90 acres per 1,000 persons. With growth of 4,063 persons over the next 10 years, this results in the need for 7.72 additional mowed acres. A cost of \$1.61 per square foot is converted to a cost of \$70,131.60 per acre which is then multiplied by the 7.72 acres to arrive at a total cost of \$541,757.40.

**Asphalt parking lot costs** are calculated as follows: Current asphalt square feet (122,950) are divided by the 2018 population to arrive at a service level of 17.0 asphalt square feet per capita. With growth of 4,063 persons over the next 10 years, this results in the need for 69,074.37 additional square feet of asphalt parking. A cost of \$2.88 per square foot is then multiplied by the 69,074.37 square feet needed to arrive at a total cost of \$198,934.19.

	Current Service Level	Facilities Needed in 10 Years	Cost per Unit	Total Improvement Cost Needed Over 10 Years
Park Improvements - per capita	\$221.68		\$221.68	\$900,669.12
<b>TOTAL</b>				<b>\$2,408,229.48</b>

### 3 Relationship of Anticipated Impacts to Anticipated Development Activity

*Utah Code 11-36a-304(1)(c): an impact fee analysis shall subject to Subsection (2), demonstrate how the anticipated impacts described in Subsections (1)(a) and (b) are reasonably related to the anticipated development activity;*

The demand placed on existing park and trail facilities by new development activity is attributed to population growth. Plain City has a 2018 population of 7,232 persons and as a result of anticipated development activity will grow to a projected 11,295 persons by 2027 – an increase of 4,063 persons. As growth occurs as a result of increased development activity, more parks and trails are needed to maintain existing standards.

### 4 Proportionate Share Analysis

*Utah Code 11-36a-304(1)(d)(i)(ii): an impact fee analysis shall estimate the proportionate share of costs for existing capacity that will be recouped; and the costs of impacts on system improvements that are reasonably related to the new development activity;*

#### Costs Reasonably Related to New Development Activity

The cost of new system improvements required to maintain the existing level of parks, recreation and trail services related to new development activity is based on the cost of system-wide park and trail facilities, as well as consultant fees for the preparation of the Impact Fee Facilities Plan and the Impact Fee Analysis.

The per capita cost to maintain the existing level of service for system-wide park land is \$188.74.

TABLE 12: PER CAPITA COST TO MAINTAIN LOS FOR PARK LAND

Park Land	Amount
Land Needed, 2018-2027	\$766,868.78
Population Growth, 2018-2027	4,063
<b>Cost per Capita – Park Land</b>	<b>\$188.74</b>

The per capita cost to maintain the existing level of service for park improvements is \$221.68.

TABLE 13: PER CAPITA COST TO MAINTAIN LOS FOR PARK IMPROVEMENTS

Description	Amount
Cost to Maintain Existing LOS for Park Improvements LOS (2018 - 2027)	\$900,669.12
Projected Population Growth (2018 - 2027)	4,063
<b>Cost per Capita – Park Improvements</b>	<b>\$221.68</b>

The per capita cost to maintain the existing level of service for mowed acres is \$133.34.

**TABLE 14: PER CAPITA COST TO MAINTAIN LOS FOR MOWED ACRES**

Description	Amount
Cost to Maintain Existing Mowed Acres (2018 - 2027)	\$541,757.40
Projected Population Growth (2018 - 2027)	4,063
<b>Cost per Capita – Mowed Acres</b>	<b>\$133.34</b>

The per capita cost to maintain the existing level of service for asphalt parking space is \$48.96.

**TABLE 15: PER CAPITA COST TO MAINTAIN LOS FOR ASPHALT PARKING**

Description	Amount
Cost to Maintain Existing Asphalt Parking LOS (2018 - 2027)	\$198,934.19
Projected Population Growth (2018 - 2027)	4,063
<b>Cost per Capita – Asphalt Parking</b>	<b>\$48.96</b>

The Impact Fee Facilities Plan and Impact Fee Analysis consultant cost is \$1.60 per capita.

**TABLE 16: PER CAPITA CONSULTANT COSTS**

Description	Amount
Consultant Cost	\$6,500
Projected Population Growth (2018 - 2027)	4,063
<b>Cost per Capita – Consultant Costs</b>	<b>\$1.60</b>

The total Parks, Recreation, Trails and Open Space Impact Fee is \$564.80 per capita.

**TABLE 17: MAXIMUM ALLOWABLE IMPACT FEE**

	Amount
Land	\$188.74
Park Improvements	\$221.68
Mowed Acres	\$133.34
Asphalt Surface	\$48.96
Consultant Costs	\$1.60
Impact Fee Fund Balance	(\$29.52)
<b>TOTAL</b>	<b>\$564.80</b>

The fee per capita is then multiplied by the household size in order to calculate the maximum fee per residential unit.

**TABLE 18: AVERAGE HOUSEHOLD SIZE**

Residential Unit Type	Household Size
All Residential Units	3.0
Single-Family Units	3.41
Multi-Family Units	3.27



Residential Unit Type	Household Size
Source: American Factfinder Community Survey; <a href="https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF">https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF</a>	

The maximum impact fee is calculated by multiplying the household size by the fee per capita.

TABLE 19: MAXIMUM IMPACT FEE

Residential Unit Type	Maximum Impact Fee
Household Size	\$1,920.32
Single-Family HH Size	\$1,925.97
Multi-Family HH Size	\$1,846.90

## 5 Impact Fee Credits

*Utah Code 11-36a-304(1)(e): an impact fee analysis shall, based on the requirements of this chapter, identify how the impact fee was calculated;*

There are no outstanding bonds or other debt obligations for parks, trails and recreation facilities for which credits must be made.

## 6 Manner of Financing

*Utah Code 11-36a-304(2)(c)(d)(e)(f)(g)(h): an impact fee analysis shall identify, if applicable: other than impact fees, the manner of financing for each public facility such as user charges, special assessments, bonded indebtedness, federal taxes, or federal grants;*

An impact fee is a one-time fee that is implemented by a local government on new development to help fund and pay for all or a portion of the costs of public facilities that are needed to serve new development. These fees are usually implemented to help reduce the economic burden on local jurisdictions that are trying to deal with population and commercial growth within the area. As a matter of policy and legislative discretion, a City may choose to have new development pay the full cost of its share of new public facilities if the facilities would not be needed except to service new development. However, local governments may use other sources of revenue to pay for the new facilities required to service new development and use impact fees to recover the cost difference between the total cost and the other sources of revenue. Additionally, impact fees allow new growth to share in the cost of existing facilities that have excess capacity.

At the current time, no other sources of funding other than impact fees have been identified, but to the extent that any are identified and received in the future, then impact fees will be reduced accordingly.

Additional system-wide park land and recreation facility improvements beyond those funded through impact fees that are desired to maintain a higher proposed level of service will be paid for by the community through other revenue sources such as user charges, special assessments, GO bonds, general taxes, etc.

### Impact Fee Credits

The Impact Fees Act requires credits to be paid back to development for future fees that may be paid to fund system improvements found in the IFFP so that new development is not charged twice. Credits may also be paid back to developers who have constructed or directly funded items that are included in the IFFP or donated to the City in lieu of impact fees, including the dedication of land for system improvements. This situation does not apply to developer exactions or improvements required to offset density or as a condition for development. Any item for which a developer receives credit should be included in the IFFP and must be agreed upon with the City before construction begins.

In the situation that a developer chooses to construct facilities found in the IFFP in lieu of impact fees, the arrangement must be made through the developer and the City.

The standard impact fee can also be decreased to respond to unusual circumstances in specific cases in order to ensure that impact fees are imposed fairly. In certain cases, a developer may submit studies and data that clearly show a need for adjustment.

At the discretion of the City, impact fees may be modified for low-income housing, although alternate sources of funding for the recreation facilities must be identified.

### Extraordinary Costs and Time Price Differential

It is not anticipated that there will be any extraordinary costs in servicing newly developed park properties. To account for the time-price differential inherent in fair comparisons of amounts paid at different times, actual costs have been used to compute buy-in costs to public facilities with excess capacity and current costs have been used to compute impacts on system improvements required by anticipated development activity to maintain the established level of service for each public facility.

## Certification

---

Zions Public Finance, Inc. certifies that the attached impact fee analysis:

1. includes only the costs of public facilities that are:
  - a. allowed under the Impact Fees Act; and
  - b. actually incurred; or
  - c. projected to be incurred or encumbered within six years after the day on which each impact fee is paid;
2. does not include:
  - a. costs of operation and maintenance of public facilities;
  - b. costs for qualifying public facilities that will raise the level of service for the facilities, through impact fees, above the level of service that is supported by existing residents;
  - c. an expense for overhead, unless the expense is calculated pursuant to a methodology that is consistent with generally accepted cost accounting practices and the methodological standards set forth by the federal Office of Management and Budget for federal grant reimbursement;
3. offsets costs with grants or other alternate sources of payment; and

4. complies in each and every relevant respect with the Impact Fees Act.

DRAFT