

Lehi City

Fire Impact Fee Analysis



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EXECUTIVE SUMMARY

Lehi City, Utah (the City) recently commissioned Bowen Collins & Association (BC&A) to prepare the <u>Lehi City Public Safety Impact Fee Facilities Plan</u> (IFFP). The City has also retained Zions Public Finance, Inc. (Zions) to calculate the City's impact fees in accordance with the IFFP and Utah State Law. An impact fee is a one-time charge to new development to reimburse the City for the cost of developing new infrastructure that will serve future development.

The impact fee will be assessed to a single, city-wide service area (Service Area). While the City does provide public safety services outside of the impact fee service area, only activity within the service area (or future development that is anticipated within the planned annexation areas) will be considered in the calculation of the updated impact fee. Emergency response to areas outside of the City or for pass through traffic, such as emergency response to Interstate 15, are categorized as "pass through" and considered non-impact fee qualifying demand. These services are provided based on mutual aid agreements or are funded through service agreements where the entity receiving the benefit pays a service charge. Therefore, the extra cost associated with this service is defrayed and does not need to be included in the impact fee analysis.

The City has expended approximately \$2,794,823 to construct fire and EMS facilities and will need to build another \$3,486,000 in the next ten years. These projects have capacity to serve new growth. There is currently no debt outstanding related to fire and EMS services and the City does not anticipate issuing future fire debt at this time. Changes to these assumptions may require an update to the impact fee analysis. The total impact fee qualifying cost of ten year improvements is estimated to be \$540,330, or about 15.5% of the anticipated cost of qualifying improvements.

Lehi City currently provides all fire and EMS service within the City boundaries. It is expected that the fire and EMS demand will continue to expand, but that the service area will not extend beyond the City's current annexation boundaries.

Recommended Fire Impact Fees

Figure ES.1 shows the maximum legal fire impact fee for residential and non-residential development. The impact fee is calculated per Equivalent Residential Unit (ERU) and demand equivalencies have been determined for multi-family and non-residential demand based on information provided by the Lehi City Fire Department accounting for observed emergency response and impacts on the system.

FIGURE ES.1: MAXIMUM IMPACT FEE SCHEDULE

Fire Impact Fees									
Development Type	ERUs		Cost per ERU	Impact Fee					
Single Family / unit	1.00	\$	198.02	\$	198.02				
Multi-Family / unit	0.41		198.02		81.98				
Private Non-Residential / ksf	0.64		198.02		126.73				

Fire and EMS Impact Fee Analysis May 2016



Figure ES.2 provides a calculation of the impact fee for non-standard users that may not fit the schedule provided in ES.1. The non-standard calculation may be used at the City's discretion for development whose impact upon the system will differ from that represented in the standard schedule. The basis of the ERU multiplier for the non-standard calculation will be determined by the Fire Chief according to the unique impact that a non-standard land use will have on the City's fire stations and Fire Department offices. The Chief will assign a number of ERUs to the development by reviewing the potential frequency of fire or EMS responses when compared to a typical ERU and by considering any specific needs or complexity of responding to an incident within the proposed development.

FIGURE ES.2: CALCULATION OF NON-STANDARD FIRE AND EMS IMPACT FEE

FIRE / EMS Emergency Response Incidents		Fire Chief Determination of Unique Project		Assessment
\$198.02	х	# of ERUs	=	Customized Impact Fee

The recommended impact fee structure presented in this analysis has been prepared to satisfy the Impact Fees Act, Utah Code Ann. § 11-36-101 et. Seq. (the "Act"), and represents the maximum fire and EMS impact fees that the City may assess within the Service Area. The City will be required to use other revenue sources to fund projects identified in the IFFP that constitute repair and replacement, cure any existing deficiencies, or maintain the existing level of service for current users.



CHAPTER 1: OVERVIEW OF THE FIRE AND EMS IMPACT FEES

What is an Impact Fee?

An impact fee is a one-time fee, not a tax, charged to new development to recover the City's cost of constructing fire and EMS facilities with capacity that will be utilized by new growth. The fee is assessed at the time of building permit issuance as a condition of development approval. The calculation of the impact fee must strictly follow the Impact Fees Act to ensure that the fee is equitable, fair, and legally defensible.

This analysis provides documentation that there is a fair comparison, or rational nexus, between the impact fee charged to new development and the impact on the capacity of the system. Impact fees are charged to different types of development and the impact fee is scaled according to different levels of demand.

Why Assess an Impact Fee?

Until new development utilizes the full capacity of existing facilities, the City can assess an impact fee to recover its cost of latent capacity available to serve future development. The general impact fee methodology divides the available capacity of existing and future capital projects between the number of existing and future users. Capacity is measured in terms of Equivalent Residential Unit, or ERU, which represents the demand that a typical single family residence places on the system.

Costs Included in the Impact Fee

The public safety services considered in this analysis are fire protection and EMS services.

The impact fees proposed in the Fire and EMS Impact Fee Analysis are calculated based upon the costs of constructing:

- New facilities required to maintain (but not exceed) the proposed level of service identified in the IFFP;
 only those expected to be built within ten years are considered in the final calculations of the impact fee
- Historic costs of existing facilities that will serve new development
- Cost of professional services for engineering, planning, and preparation of the impact fee facilities plan and impact fee analysis

Costs Not Included in the Impact Fee

- Operational and maintenance costs
- Cost of facilities constructed beyond 10 years
- Cost of facilities funded by grants or other funds which the City is not required to repay
- Cost of renovating or reconstructing facilities which do not provide new capacity or needed enhancement of services to serve future development



How Are the Impact Fees Calculated?

A fair impact fee is calculated by dividing the cost of existing and future facilities by the number of new ERUs that will benefit from the unused capacity. Only the capacity that is needed to serve the projected growth within the next ten years is included in the fee. The proposed impact fees are comprised of the costs of future capital projects that benefit additional development within the Service Area, and professional expenses pertaining to the regular update of the IFFP and impact fee analysis.

Description of the Service Area

The fire impact fee has been calculated for one service area which is comprised of the incorporated boundaries of Lehi City. The impact fees exclude the costs of capacity that are required for emergency response outside of the service area or within the service area that are related to pass-through traffic.

What is an Equivalent Residential Unit (ERU)?

The unit of measurement used for fire and EMS services is the future demand by ERU and based on historic emergency response data. An ERU is equal to the demand of a typical single family residential home.

Project Costs and Financing

The City has recently purchased land for a new fire station (fire station #3) and anticipates construction of the station in 2016. A portion of the land and improvements have been allocated to ten year growth and included in the impact fee.

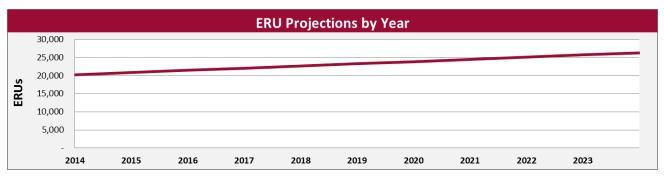


CHAPTER 2: IMPACT FROM GROWTH UPON THE CITY'S FACILITIES AND LEVEL OF SERVICE

Future Demand within the Service Area

Fire and EMS demand within the City will increase as development activity rebounds and homes and businesses are built. Currently the City has 20,256 ERUs which are expected to grow by 6,065 to a total of 26,321 ERUs by 2023. The majority of this increase in demand will be attributable to new growth, but it is also expected that demand of 1,425 ERUs will be attributable to increased pass through demands. Only the increased demand from new growth, 4,640 ERUs, will be included in impact fee calculations.





Level of Service Analysis

The Impact Fee Act specifically prohibits the use of impact fees to cure existing deficiencies in infrastructure or to construct infrastructure that provides a level of service per user that is higher than the existing level of service. Furthermore, impact fees cannot be used to maintain a level of service for current system users by funding the repair and/or replacement of existing facilities.

It should be noted that this level of service calculation is separate from the service standard goals which the City is aiming to reach—especially in regards to fire and EMS coverage. When it comes to protecting property and especially life, zero loss would be the ideal goal. However, constraints of resources make it impossible to locate a fire station on every corner. Therefore, decisions must be made to enable the best protection possible under the circumstances.

The City currently responds to a fire with an initial attack of six individuals which meets minimum standards for a fire attack. National guidelines recommend an initial attack of fifteen people. Therefore, the City falls short of national recommendations for initial attack numbers as well as fire emergency response time.

One important factor in level of service and growth projections for Fire and EMS is allocating historic emergency response data to various residential or non-residential land uses. Private responses are those which are made to private land uses, such as residences, businesses, and churches. Public responses are those which are made to public land uses such as public land, parks or roads. These calculations are used to



help determine private responses generated per development type to help identify the demand each development type places on the system.

Fighting an active fire is not the only responsibility of the Fire Department. Firefighters regularly perform facility inspections, pre-planning walk throughs of large commercial/industrial buildings to familiarize themselves with the facilities, public education and other tasks. Current staff is adequate to meet the demands but is quickly approaching the limits of their available time and manpower to accomplish these duties. The City has 20,256 fire ERUs and can serve that demand with their two existing stations so a level of service standard of 10,000 ERUs served per fire station has been identified. The City plans to build a third fire station to meet future demand as well as shift existing demand to meet other needs such as station placement to minimize response times. The City plans to construct the new station in 2016.

Pass Through Demand and Emergency Response to Interstate 15

As ERU projections were prepared attention was paid to pass through demand. Emergency response to pass through traffic, such as incidents generated by traffic on I-15 and other State roads or interagency assists to neighboring communities, accounts for approximately 16.6% of the ERUs projected for Lehi City. ERUs for pass through have been based on numbers of incidents associated with pass through available from historic records or as estimated by the Fire Chief and then converted to ERUs in the IFFP according to total system demand. New growth projections net out demand and ERUs associated with pass through to prevent future users from being overcharged for demand that is associated with I-15 or neighboring communities.



CHAPTER 3: FUTURE AND HISTORIC CAPITAL PROJECTS COSTS

The Impact Fees Act allows the City to recover the costs of fire capital improvements in the calculation of the impact fees. Capital projects costs are today's estimated construction costs of growth-driven improvements and appropriate professional services without inflation from current dollars to construction year costs. The City does not have any debt outstanding related to the fire department and does not anticipate issuing future bonds related to police infrastructure.

Existing Capacities Available for Growth

The City currently has two fire stations, Station #81 and Station #82. As documented in the IFFP, a portion of the capacity of these existing fire facilities, 15.5%, is available to serve ten year growth. Capacity of existing facilities is summarized in the table below.

Figure 3.1: Existing Capacity

System	% to Existing/ Passthrough	% to 10 Year Growth	% to Beyond 10 Year Growth	Cost to Existing	Cost to 10 Year Growth	Cost to Beyond 10 Year	Total Historic Cost
Station 81 (176 North Center)	72.3%	15.5%	12.2%	\$ 144,600	\$ 31,000	\$ 24,400	\$ 200,000
Station 81 Land	72.3%	15.5%	12.2%	36,150	7,750	6,100	50,000
Station 82 (2600 North 250 West)	72.3%	15.5%	12.2%	1,731,457	371,198	292,168	2,394,823
Station 82 Land	72.3%	15.5%	12.2%	108,450	23,250	18,300	150,000
Totals				\$ 2,020,657	\$ 433,198	\$ 340,968	\$ 2,794,823

Future Project Capacities Available for Growth

The City has a third fire station it intends to construct in 2016. The costs of future capital projects are defined in the corresponding Impact Fees Facilities Plan prepared by BC&A and are summarized in Figure 3.2.

FIGURE 3.2: CAPITAL PROJECT COSTS TO BE FUNDED THROUGH IMPACT FEES

Project Name	% to Existing / Project Level	% to Growth in Pass Through Demand	% Impact Fee Qualifying - 10 Year	% Impact Fee Qualifying - Beyond 10 Year	Year to be Constructed	Constructio n Cost	10 Year Impact Fee Qualifying Cost	Impact Fee Qualifying Beyond 10 Years	Non Impact Fee Qualifying
Future Fire Stations									
Fire Station #3 Land	67.5%	4.8%	15.5%	12.2%	2014	\$1,141,000	\$ 176,855	\$ 139,202	\$ 824,943
Fire Station #3 Improvements	67.5%	4.8%	15.5%	12.2%	2016	2,345,000	363,475	286,090	1,695,435
Fire Ten Year Total						\$3,486,000	\$ 540,330	\$ 425,292	\$2,520,378

 $Source: Bowen\ Collins\ \&\ Associates\ Public\ Safety\ Impact\ Fee\ Facilities\ Plan\ Table\ ES-4$



Impact Fee Analysis Updates

As development occurs and capital project planning is periodically revised, the future lists of capital projects and their costs may be different than the information utilized in this analysis. For this reason, it is assumed that the City will perform updates to the analysis every three years. A 2016 cost of \$30,000 for preparing this analysis and the impact fee facilities plan has been included in the impact fee calculation.

Bond Debt Service and Grant Funds

The City does not currently have any outstanding debt related to Fire and EMS service and does not anticipate any future fire bond issues. The City also does not anticipate receiving any grant funding for impact fee qualifying fire and EMS projects.



CHAPTER 4: PROPORTIONATE SHARE ANALYSIS

The Impact Fees Act requires the impact fee analysis to estimate the proportionate share of the cost for existing capacity that will be recouped as shown in Figure 3.1. The impact fee must be based on the historic costs and reasonable future costs of the system. This chapter will show in Figure 4.1 that the proposed impact fee for system improvements is reasonably related to the impact on the Fire and EMS services from new development activity.

The proportionate share analysis considers the manner of funding utilized for existing public facilities. Historically the City has funded existing infrastructure with sources including the following:

- Property Tax Revenues
- Impact Fees

In the future, the City will primarily rely upon property tax revenues to fund the operation and maintenance of the system. Grant funding for impact fee qualifying fire and EMS projects are not anticipated. However, if they are received, future impact fees will be discounted according to the size of grant and what it will be intended to fund.

Developer Credits

If a project included in the Impact Fee Facilities Plan (or a project that will offset the demand for a system improvement that is listed in the IFFP) is constructed by a developer then that developer is entitled to a credit against impact fees owed. (Utah Impact Fees Act, 11-36a-304(2)(f)). There are currently no situations in this analysis or projects that would entitle a developer to a credit.

Time-Price Differential

Utah Code 11-36a-301(2)(h) allows for the inclusion of a time-price differential in order to create fairness for amounts paid at different times. Typically time-price differential is considered to be an inflationary component added to capital project costs to account for construction inflation for future projects. An inflationary component is excluded from this analysis given the uncertain future rates of capital project cost inflation.



FIGURE 4.1: FIRE AND EMS IMPACT FEE CALCULATION

Component		% That will Serve Ten Year Demand	Dollar Amount that will Serve Ten Year Demand	Fire ERUs	Cost per ERU
Fire and EMS Impact Fee					
Future 10 Year Capital Projects	\$ 3,486,000	15.50%	\$ 540,330	4,640	\$ 116
Future Fire Debt to be Issued - INTEREST ONLY	-	15.50%	ı	4,640	-
Existing Fire Assets	2,794,823	15.50%	433,198	4,640	93
Existing Fire Debt - INTEREST ONLY	-	0.00%	-	4,640	-
Subtotal	\$ 6,280,823		\$ 973,528		\$ 209.81
Professional Services / Credits					
Unspent Impact Fee Funds	(546,597)	15.50%	\$ (84,723)	4,640	\$ (18)
Professional Services/ Credits	30,000	100%	30,000	4,640	6
Professional Services / Credits Subtotal	(516,597)		(54,723)		\$ (12)
Total Impact Fee Per ERU	\$ 5,764,226		\$ 918,805		\$ 198.02

Maximum Legal Fire Impact Fees per ERU

As shown in Figure 4.1, the maximum legal impact fee per ERU is calculated to be \$198.02. This fee is the combination of individual fees for the buy in to existing facilities, future facilities, and professional fees. Each fee for individual components is based upon the historic and future costs divided by the total and available capacities. This results in a very precise impact fee per ERU and complies with the Impact Fees Act.

Determination of Fire Impact Fee

The impact fees to be paid by different residential and non-residential users are assessed according to ERUs. A single family home is one ERU. The impact fee is assessed according to Single Family or Multi-Family per unit and Non-Residential uses are assessed a fee per 1,000 square feet as shown in Figure 4.2.

FIGURE 4.2: MAXIMUM IMPACT FEE SCHEDULE

Fire Impact Fees									
Development Type	ERUs		Cost per ERU	lm	Impact Fee				
Single Family / unit	1.00	\$	198.02	\$	198.02				
Multi-Family / unit	0.41		198.02		81.98				
Private Non-Residential / ksf	0.64		198.02		126.73				

Non-Standard Demand Adjustments

The City reserves the right under the Impact Fees Act (Utah Code 11-36-402(1)(c,d)) to assess an adjusted fee to respond to unusual circumstances and to ensure that the impact fees are assessed fairly. The non-standard calculation will be used for all non-residential development and may also be used at the City's discretion for residential development whose impact upon the system will differ from that of a standard residential user. The basis of the ERU multiplier for the non-standard calculation will be determined by the Fire Chief according to the unique impact that a non-residential or non-standard residential land use will have on the City's fire stations and Fire Department offices. The Chief will assign a number of ERUs to the development by reviewing the potential frequency of fire or EMS responses and by considering any specific needs or complexity of responding to an incident within the proposed development.



The impact fee formula shown below in Figure 4.3 for a non-standard user is based upon the anticipated annual demand of that particular user.

FIGURE 4.3: CALCULATION OF NON-STANDARD IMPACT FEE

FIRE / EMS Emergency Response Incidents	Response Incidents			Assessment
\$198.02	х	# of ERUs	=	Customized Impact Fee



APPENDICES: CERTIFICATION, SERVICE AREA MAP, IMPACT FEE CALCULATIONS

Lehi City

Fire and EMS Impact Fee Analysis May 2016



In accordance with Utah Code Annotated, 11-36a-306(2), Zions Public Finance, Inc. (Zions), makes the following certification:

Zions certifies that the attached impact fee analysis:

- 1. includes only the cost 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. cost of 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. offset costs with grants or other alternate sources of payment; and
- 4. complies in each and every relevant respect with the Impact Fees Act.

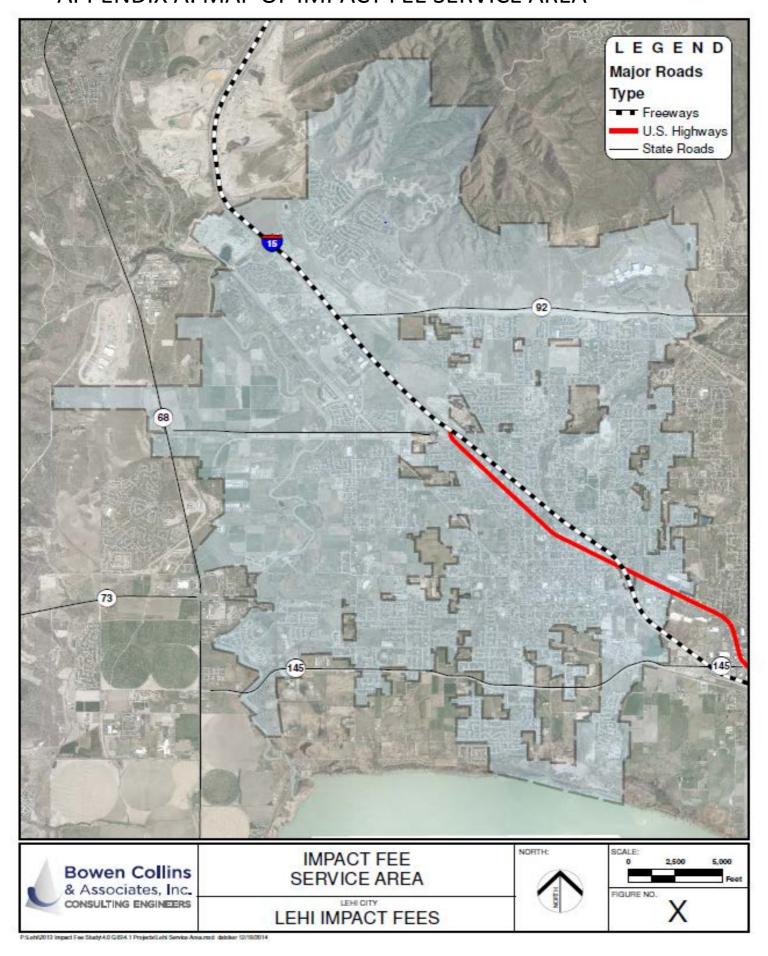
Zions Public Finance, Inc. makes this certification with the following caveats:

- 1. All of the recommendations for implementations of the Impact Fee Facilities Plan (IFFP) made in the IFFP or in the impact fee analysis are followed in their entirety by City staff and Council in accordance to the specific policies established for the Service Area.
- 2. If all or a portion of the IFFP or impact fee analysis are modified or amended, this certification is no longer valid.
- 3. All information provided to Zions Public Finance, Inc. its contractors or suppliers is assumed to be correct, complete and accurate. This includes information provided by Lehi City Corporation and outside sources. Copies of letters requesting data are included as appendices to the IFFP and the impact fee analysis.

Dated: 5/12/2016

ZIONS PUBLIC FINANCE, INC.

APPENDIX A: MAP OF IMPACT FEE SERVICE AREA



Appendix B: Equivalent Residential Unit (ERU) Projections for Fire

CURRENT AND FUTURE ERUS FOR THE FIRE SERVICE AREA

A B C D E F G H I J

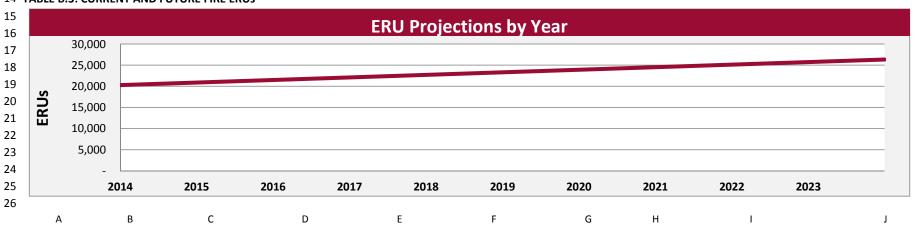
TABLE B.1: CURRENT AND FUTURE FIRE ERUS

1	Year	Existing	Passthrough	Non- Residential	Multi-Family	Single Family	Total
2	2013	13,092	3,376	3,788	-	-	20,256
3	2014	20,256	143	328	32	104	20,863
4	2015	20,256	285	655	65	208	21,469
5	2016	20,256	428	983	97	312	22,076
6	2017	20,256	570	1,310	130	416	22,682
7	2018	20,256	713	1,638	162	521	23,289
8	2019	20,256	855	1,965	194	625	23,895
9	2020	20,256	998	2,293	227	729	24,502
10	2021	20,256	1,140	2,620	259	833	25,108
11	2022	20,256	1,283	2,948	292	937	25,715
12	2023	20,256	1,425	3,275	324	1,041	26,321

TABLE B.2: FIRE ERUS								
Fire ERUs								
Current ERUs	20,256							
Total 10 Year ERUs	26,321							
10 Year Growth in ERUs	6,065							
10 Year Qualifying Growth	4,640							

13 Source: Public Safety Impact Fee Facilities Plan prepared by Bowen Collins & Associates

14 TABLE B.3: CURRENT AND FUTURE FIRE ERUS



Appendix C: Historic Asset Data

	Α	В	С	D	E	F	G	Н	
1	Table C.1: Historic Asset Data Summa System	% to Existing/ Passthrough	% to 10 Year Growth	% to Beyond 10 Year Growth	Cost to Existing	Cost to 10 Year Growth	Cost to Beyond 10 Year	Total Historic Cost	1
2	Station 81 (176 North Center)	72.3%	15.5%	12.2%	\$ 144,600	\$ 31,000	\$ 24,400	\$ 200,000	2
3	Station 81 Land	72.3%	15.5%	12.2%	36,150	7,750	6,100	50,000	3
4	Station 82 (2600 North 250 West)	72.3%	15.5%	12.2%	1,731,457	371,198	292,168	2,394,823	4
5	Station 82 Land	72.3%	15.5%	12.2%	108,450	23,250	18,300	150,000	5
6	Totals				\$ 2,020,657	\$ 433,198	\$ 340,968	\$ 2,794,823	6
7									7
	Δ	R	r	D	F	F	G	Н	

APPENDIX D: FIRE 10 YEAR CAPITAL PROJECTS

	А	В	С	D	E	F	G	Н	1	J	K	
1	TABLE D.1: FIRE CAPITAL PROJE	CTS										1
2	Project Name	% to Existing / Project Level	% to Growth in Pass Through Demand	% Impact Fee Qualifying - 10 Year	% Impact Fee Qualifying - Beyond 10 Year	Year to be Constructed	Construction Cost	10 Year Impact Fee Qualifying Cost	Impact Fee Qualifying Beyond 10 Years	Non Impact Fee Qualifying		2
3	Future Fire Stations										1	3
4	Fire Station #3 Land	67.5%	4.8%	15.5%	12.2%	2014	\$ 1,141,000	\$ 176,855	\$ 139,202	\$ 824,943	1	4
5	Fire Station #3 Improvements	67.5%	4.8%	15.5%	12.2%	2016	2,345,000	363,475	286,090	1,695,435	1	5
6											1	6
7											1	7
8	Fire Ten Year Total						\$ 3,486,000	\$ 540,330	\$ 425,292	\$ 2,520,378	1	8
9	Source: Bowen Collins & Associates	Public Safety Imp	act Fee Facilit	ies Plan Table ES	-4							9
	А	В	С	D	Ε	F	G	Н	I	J	K	

APPENDIX E: CALCULATION OF THE IMPACT FEE PER EDU

С Ε Α В

TABLE E.1: IMPACT FEE CALCULATION

1	Component	Total Cost to Component	% That will Serve Ten Year Demand	Dollar Amount that will Serve Ten Year Demand	Fire ERUs	Cost per ERU	1
2	Fire and EMS Impact Fee						2
3	Future 10 Year Capital Projects	\$ 3,486,000	15.50%	\$ 540,330	4,640	\$ 116	3
4	Future Fire Debt to be Issued - INTEREST ONLY	-	15.50%	-	4,640	-	4
5	Existing Fire Assets	2,794,823	15.50%	433,198	4,640	93	5
6	Existing Fire Debt - INTEREST ONLY	-	0.00%	-	4,640	-	6
7	Subtotal	\$ 6,280,823		\$ 973,528		\$ 209.81	7
8	Professional Services / Credits			8			
9	Unspent Impact Fee Funds	(546,597)	15.50%	\$ (84,723)	4,640	\$ (18) 9
10	Professional Services/ Credits	30,000	100%	30,000	4,640	6	10
11	Professional Services / Credits Subtotal	(516,597)		(54,723)		\$ (12	11
12	Total Impact Fee Per ERU	\$ 5,764,226		\$ 918,805		\$ 198.02	12
	А	В	С	D	E	F	_

Appendix F: Maximum Fire Impact Fees

	Α	В	С	D	E	
	Table F.1: Residential Impact Fee					
1			1			
2	Development Type	ERUs	Cost per ERU	Impact	Fee	2
3	Single Family / unit	1.00	\$ 1	.98.02 \$ 19	98.02	3
4	Multi-Family / unit	0.41	1	.98.02	31.98	4
5	Private Non-Residential / ksf	0.64	1	.98.02 12	26.73	5
6						6
7						7
8	TABLE F.2: Non-Standard Impact Fe		8			
9	FIRE / EMS Emergency Response Incidents		Fire Chief Determi of Unique Proje		Assessment	9
10	\$198.02	х	# of ERUs	=	Customized Impact Fee	10
	Δ	R	C	D	F	