

MOAB VALLEY FIRE PROTECTION DISTRICT, UTAH

FIRE

IMPACT FEE FACILITY PLAN & IMPACT FEE ANALYSIS DECEMBER 2025



IMPACT FEE FACILITY PLAN (IFFP) CERTIFICATION

EFG Consulting (EFG) certifies that the attached impact fee facilities plan:

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; and,
3. complies in each and every relevant respect with the Impact Fees Act.

IMPACT FEE ANALYSIS (IFA) CERTIFICATION

EFG 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;
 - d. offsets costs with grants or other alternate sources of payment; and,
3. complies in each and every relevant respect with the Impact Fees Act.

EFG Consulting makes this certification with the following caveats:

1. All of the recommendations for implementations of the IFFP made in the IFFP documents or in the IFA documents are followed by District staff and elected officials.
2. If all or a substantial portion of the IFFP or IFA are modified or amended by the District, this certification is no longer valid.
3. All information provided to our team is assumed to be correct, complete, and accurate. This includes information provided by the District as well as outside sources.

EFG Consulting

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SECTION I: EXECUTIVE SUMMARY

The purpose of this Impact Fee Facility Plan (IFFP) and Impact Fee Analysis (IFA) is to fulfill the requirements of the Utah Code Title 11 Chapter 36a (Impact Fee Act) to enable Moab Valley Fire Protection District (District) to update its fire impact fee for the entire District. The following is a summary of the IFFP inputs. The IFFP and IFA will identify the maximum allowable impact fee. The District may choose to adopt a fee lower than the maximum but not higher.

SERVICE AREA:

The service area for this IFFP and IFA will include the entire District.

DEMAND ANALYSIS:

The demand unit utilized in this analysis is equivalent residential connections (ERC). Future growth in the District is estimated to increase from 6,012 ERCs in 2024 to 9,056 ERCs in 2034 which is an increase of 3,044 ERCs. Of that number, 2,383 are projected to be residential units and 661 are projected to be non-residential.

For a more detailed methodology see Section 2: Demand Analysis.

LEVEL OF SERVICE:

The impact fee act (Act) requires that the District identify the current level of service (LOS). The LOS for fire protection services is shown below.

	Level of Service
Fire Facility (Residential & Commercial)	Full-Time Equivalent: FTE/ERC: 0.00424 FTE Facility: SF/FTE: 813 SF
Fire Equipment (Commercial)	Equipment(\$)/Commercial ERC: \$504

EXCESS CAPACITY TO MEET DEMAND AT LOS

There is currently no excess capacity in fire protection services.

FUTURE FACILITIES ANALYSIS:

Based upon the demand at the current LOS the following future facilities will be required to meet demand over the next 10 years.

Utility	Future Projects
Fire Facility	New 10,500 SF facility estimated at \$5.8m
Fire Equipment	Ladder Truck (\$1.9m) 2 Type 1 Engines (\$2.7m)

FUNDING OF FACILITIES:

The District has not included any plans to issue debt for any future facilities. This does not mean the District will not choose to do so. However, this analysis has assumed no interest carry cost as part of any impact fees. Should grant funds be received which will fund any of the projects in this report, the District will revisit the impact fee to ensure compliance with the Act. Currently, the District anticipates meeting the LOS for the system by funding new projects with cash generated from impact fees.

PROPOSED IMPACT FEE

The following are the maximum allowable impact fees for fire protection.

	Impact Fee
Residential ERC	\$1,897/Residential ERC
Commercial ERC	\$2,401/Commercial ERC

PROPOSED IMPACT FEE

The Staff recommends that the impact fee be charged at the maximum amount as described above and outlined below.

SECTION 2: FIRE IFFP & IFA

The District provides fire protection services. This section will describe the following items in accordance with the Act for fire protection.

- service area,
- demand within the service area,
- the current level of service,
- excess capacity in the current system to meet demand,
- future facilities required to meet demand,
- funding plans for future facilities,
- the maximum allowable impact fee new growth would pay to cover the proportionate share of excess capacity and new facilities, and
- the staff recommendation for impact fees to be charged.

DEMAND ANALYSIS

The demand unit utilized in this analysis is equivalent residential connections (ERC). The demand over the next ten years was estimated assuming a 4 percent growth rate for residential development and a 5 percent growth rate for commercial development.

Future growth in the District is estimated to increase from 6,012 ERCs in 2024 to 9,056 ERCs in 2034 which is an increase of 3,044 ERCs. Of that number, 2,383 are projected to be residential units and 661 are projected to be non-residential. The facility portion of the impact fee is charged to all ERCs. The equipment portion is only charged to commercial ERCs.

The table below provides a summary of the ERCs estimated for commercial and residential. One commercial ERC is equivalent to 9,000 SF.

ERC Projections			
	2024	2034	New ERCs
Residential	4,961	7,344	2,383
Commercial	1,051	1,712	661
Total	6,012	9,056	3,044

SERVICE AREA

The service area for the fire impact fee is the entire District.

CURRENT LEVEL OF SERVICE:

The unit of measurement for the facility LOS is full-time equivalent per ERC and square feet of facility space per full-time equivalent. The current FTE/ERC LOS is 0.00424 square feet per ERC. The current SF/FTE LOS is 813 SF. The table below provides the calculation.

Historic Projects	SF	FTE	SF/FTE	Current ERC	FTE/ERC
Station 1	16,861				
Station 2	2,680				

MOAB VALLEY FIRE PROTECTION DISTRICT IMPACT FEE

Historic Projects	SF	FTE	SF/FTE	Current ERC	FTE/ERC
Station 3	1,200				
Total	20,741	26	813	6,012	0.00424

The equipment LOS is investment in equipment per commercial ERC. Rolling stock can only be charged to commercial ERCs and only if the rolling stock is above \$500,000. The LOS for Equipment is \$504/ERC. The table below provides the calculation of this LOS.

Historic Projects	Year	Cost	Current & Future 10 Yr ERCs	Cost /ERC
Ladder Truck	2026	\$1,900,000		
Type 1 Engine	2027	\$1,200,000		
Type 1 Engine*	2031	\$1,459,983		
Total		\$4,559,983	9,056	\$504
<i>*The cost of the second Type 1 Engine was inflated by 4% for 5 years</i>				

EXCESS CAPACITY, FUTURE FACILITIES, & FUNDING PLAN

Because the LOS for fire protection services uses the value of all current facilities, there is no excess capacity in the system.

The District plans to build an additional fire station in the near future to maintain the facility LOS. This new station is expected to be 10,500 square feet and cost approximately \$5.8m. Based on the existing LOS, this facility will serve the ERCs expected over the next 10 years. In order to provide rolling stock for commercial, the District will buy one ladder truck at \$1.9m and two Type 1 Engines at \$1.2m and \$1.5m over the next 10 years.

The District would utilize taxes, fees, impact fees, grants and may use bonds or equipment leases to construct and/or acquire future facilities and/or equipment. Although debt may be used, the District has not assumed any interest expense in this calculation.

MAXIMUM ALLOWABLE IMPACT FEE & STAFF RECOMMENDATION:

The maximum allowable impact fee that can be charged for future facilities is \$1,897 per ERC. This was calculated by dividing the cost of the new station (\$5.8m) by the number of future ERC over 10 years (3,044). The maximum allowable impact fee that can be charged to commercial ERCs for equipment is an additional \$504. Commercial ERCs would thus pay \$2,401 per ERC.

	Impact Fee
Residential ERC	\$1,897/Residential ERC
Commercial ERC	\$2,401/Commercial ERC

Staff recommends charging the maximum allowable impact fee for fire protection services.

APPENDIX A – DRAFT IMPACT FEE ENACTMENT

Impact Fee Resolution

Moab Valley Fire Protection District, Utah

Resolution Number:

RESOLUTION ADOPTING AN IMPACT FEE FACILITIES PLAN AND IMPACT FEE ANALYSIS AND IMPOSING CERTAIN IMPACT FEES FOR FIRE SERVICES; PROVIDING FOR THE CALCULATION AND COLLECTION OF SUCH FEES; PROVIDING FOR APPEAL, ACCOUNTING AND SEVERABILITY OF THE SAME, AND OTHER RELATED MATTERS

WHEREAS, On [REDACTED], 2025 Moab Valley Fire Protection District, Utah (the “District”) posted notice as to its intention to prepare an impact fee facilities plan (“IFFP”) and impact fee analysis (“IFA”) for fire service impact fees and invited all interested parties to participate in the impact fee preparation process, consistent with UCA Section 11-36a-501;

WHEREAS, the District is a special service district in the State of Utah, authorized and organized under the provisions of Utah law and is authorized pursuant to the Impact Fees Act, Utah Code Ann. 11-36a-101 et seq. to adopt impact fees; and

WHEREAS, on [REDACTED], 2025, the District posted notice of a public hearing on Utah’s Public Notice Website, the District’s Website, and at the District’s administrative building and two other locations in the jurisdiction in accordance with 17B-1-111 to consider the assumptions and conclusions of the Impact Fee Facilities Plans and the Impact Fee Analysis;

WHEREAS, on [REDACTED], 2025, EFG-Consulting LLC (the “Consultant”) certified their work under UCA section 11-36a-306(1) and (2);

WHEREAS, on [REDACTED], 2025, a copy of the IFFP and IFA and the proposed Impact Fee Resolution, along with a summary of the analysis that was designated to be understood by a lay person, were made available to the public and deposited at the District administrative office, on the Utah public notice website, and on the District Website; and

WHEREAS, on [REDACTED], 2025, the District posted notice of the date, time and place of the public hearing to consider the IFA in three public places and on the public notices website, and on the District Website; and

WHEREAS, the District Board (the “Board”) met in special session on [REDACTED], 2025, to convene a public hearing and to consider adopting the IFFP and IFA, imposing fire service impact fees, providing for the calculation and collection of such fees, and providing for an appeal process, accounting and reporting method and other related matters; and

WHEREAS, on [REDACTED], 2025, the Board held a public hearing regarding the IFA and the Impact Fee Resolution; and

WHEREAS, on [REDACTED], 2025, after considering the input of the public and stakeholders and relying on the professional advice and certification of the Consultant, the District adopted the findings, conclusions, and recommendations of the Fire IFFP prepared by the Consultant, a copy of which is attached hereto as Exhibit “A” and incorporated herein by reference; and

WHEREAS, the Consultant in connection with the District prepared a schedule of impact fees for each type of development activity that specifies the amount of the impact fee to be imposed for each type of system improvement. A copy of such Schedule of Fees is attached hereto as Exhibit “B” and incorporated herein by reference; and

WHEREAS, based on the input of the public and stakeholders and relying on the professional advice and certification of Consultant; and

WHEREAS, after careful consideration and review of the comments at the public hearing, the Board has determined that it is in the best interest of the health, safety and welfare of the inhabitants of the District to adopt the findings and recommendations of the IFFP and IFA to address the impacts of development upon the fire system, to adopt the IFFP as proposed, to approve the IFA as proposed, to adopt fire impact fees, to provide for the calculation and collection of such fees, and to provide for an appeal process, and an accounting and reporting method of the same.

NOW, THEREFORE, BE IT RESOLVED by the Board as follows:

Section 1. Findings. The Board finds and determines as follows:

1.1. All required notices have been given and made and public hearings conducted as requested by the Impact Fees Act with respect to the IFFP, the IFA, and this Impact Fee Resolution (this “Resolution”).

1.2. Growth and development activities in the District will create additional demands on its infrastructure. The facility improvement requirements that are analyzed in the IFFP and the IFA are the direct result of the additional facility needs caused by future development activities. The persons responsible for growth and development activities should pay a proportionate share of the costs of the facilities needed to serve the growth and development activity.

1.3. Impact fees are necessary to achieve an equitable allocation to the costs borne in the past and to be borne in the future, in comparison with the benefits already received and yet to be received.

1.4. In enacting and approving the IFA including the impact fees recommended and this Resolution, the District has taken into consideration, and may consider on a case-by-case basis in the future, the future capital facilities and needs of the District, the capital financial needs of the District that are the result of the District’s future facilities’ needs, the distribution of the burden of costs to different properties within the District based on the use of fire services of the District by such properties, the financial contribution of those properties and other properties

similarly situated in the District at the time of computation of the required fee and prior to the enactment of this Resolution, all revenue sources available to the District, and the impact on future facilities that will be required by growth and new development activities in the District.

1.5. The provisions of this Resolution shall be liberally construed in order to carry out the purpose and intent of the Board in establishing the impact fee program.

Section 2. Definitions.

2.1. Except as provided below, words and phrases that are defined in the Impact Fees Act shall have the same meaning in this Resolution.

2.2. “Service Area” shall mean that the entire geographic area of the District’s boundaries.

2.3. “Project Improvement” does not mean system improvement and includes, but is not limited to, those projects identified in the plans for the benefit of growth.

2.4. “Utah State Impact Fees Act” shall mean Title 11, Chapter 36a, Utah Code Annotated or its successor state statute if that title and chapter is renumbered, recodified, or amended.

Section 3. Adoption.

The Board hereby approves and adopts the IFA including the recommended impact fees attached and the analyses reflected therein. The IFFP and the IFA are incorporated herein by reference and adopted as though fully set forth herein.

Section 4. Impact Fee Calculations.

4.1. Impact Fees. The impact fees imposed by this Resolution shall have one component; a future facilities impact fee. The Impact Fee shall be calculated as set forth below.

4.2. Developer Credits/Developer Reimbursements. A developer, including a school district or charter school, may be allowed to receive a credit against or proportionate reimbursement of impact fees if the developer dedicates land for a system improvement, builds and dedicates some or all of a system improvement, or dedicates a public facility that the District and the developer agree will reduce the need for a system improvement. A credit against impact fees shall be granted for any dedication of land for, improvement to, or new construction of, any system improvements provided by the developer if the facilities are system improvements to the respective utilities, or are dedicated to the public and offset the need for an identified future improvement.

4.3. Adjustment of Fees. The Board may adjust either up (but not above the maximum allowable fee) or down the standard impact fees at the time the fee is charged in order to respond to an unusual circumstance in specific cases and to ensure that the fees are imposed

fairly. The Board may adjust the amount of the fees to be imposed if the fee payer submits studies and data clearly showing that the payment of an adjusted impact fee is more consistent with the true impact being placed on the system.

4.4. Impact Fee Accounting. The District shall establish a separate interest-bearing ledger account for the cash impact fees collected pursuant to this Resolution. Interest earned on such account shall be allocated to that account.

(a) Reporting. At the end of each fiscal year, the District shall prepare a report generally showing the source and amount of all monies collected, earned and received by the fund or account and of each expenditure from the fund or account. The report shall also identify impact fee fund by the year in which they were received, the project from which the funds were collected, the capital projects from which the funds were budgeted, and the projected schedule for expenditure and be provided to the State Auditor on the appropriate form found on the State Auditor's Website.

(b) Impact Fee Expenditures. Funds collected pursuant to the impact fees shall be deposited in such account and only be used by the District to construct and upgrade the respective facilities to adequately service development activity or used as otherwise approved by law.

4.5. Refunds. The District shall refund any impact fee paid when:

(a) the fee payer has not proceeded with the development activity and has filed a written request with the Board for a refund within one (1) year after the impact fee was paid;

(b) the fees have not been spent or encumbered within six (6) years of the payment date; and

(c) no impact has resulted.

Section 5. Appeal.

5.1. Any person required to pay an impact fee who believes the fee does not meet the requirements of the law may file a written request for information with the Board.

5.2. Within two (2) weeks of the receipt of the request for information the Board shall provide the person or entity with a copy of the reports and with any other relevant information relating to the impact fee.

5.3. Any person or entity required to pay an impact fee imposed under this article, who believes the fee does not meet the requirements of law may request and be granted a full administrative appeal of that grievance. An appeal shall be made to the Board within thirty (30) calendar days of the date of the action complained of, or the date when the complaining person reasonably should have become aware of the action.

5.4 The notice of the administrative appeal to the Board shall be filed and shall contain the following information:

- (a) the person's name, mailing address, and daytime telephone number;
- (b) a copy of the written request for information and a brief summary of the grounds for appeal; and
- (c) the relief sought.

5.5 The District shall schedule the appeal before the Board no sooner than five (5) days and no later than fifteen (15) days from the date of the filing of the appeal. The written decision of the Board shall be made no later than thirty (30) days after the date the challenge to the fee is filed with the Board and shall, when necessary, be forwarded to the appropriate officials for action.

Section 6. Recitals. The recitals set forth above are adopted and incorporated herein.

This Resolution shall be effective as of ____, 2026 (90 days after its adoption by the District as outlined in the Impact Fee Act).

District Chair _____

Attested By:

Exhibit A – IFFP & IFA

Exhibit B – Impact Fee Schedule

	Impact Fee
Residential ERC	\$1,897/Residential ERC
Commercial ERC	\$2,401/Commercial ERC

The District reserves the right under the Impact Fee Act to use a multiplier to calculate the multiple ERC rate and adjust the impact fee accordingly.

APPENDIX B – IMPACT FEE CALCULATION

Grand County

Fire

Level of Service - Facilities					
Historic Projects	SF	FTE	SF/FTE	Current ERCs	FTE/ERC
Station 1	16,861				
Station 2	2,680				
Station 3	1,200				
Total	20,741	26	813	6,012	0.00424
New Growth	10,500	12.91		3,044	
Cost / SF	\$ 550.00				
Cost	\$ 5,774,844				
Facility Impact Fee/ERC \$ 1,897.43					

Level of Service - Equipment					
	Cost	Current & Future 10 yr ERCs	Cost/ERC	Year	
Ladder Truck	1,900,000			2026	
Type 1 Engine	1,200,000			2027	
Type 1 Engine	1,459,983			2031	inflated it by 4% for 5 years
	-				
Total	4,559,983	9,056	504		
Facility Impact Fee/ERC \$ 503.55					

Impact Fee Summary	Facilities	Equipment	Total/ERC
Residential Impact Fee	\$ 1,897.43	\$ -	\$ 1,897
Non-Residential	\$ 1,897.43	\$ 503.55	\$ 2,401

Current Facility Summary	
Station 1	
Bays	7424
Admin	6197
Training Tower	1000
Storage	2240
Total	16861
Station 2	
Bays	1760
Living Quarters	920
Total	2680
Station 3	
Bays	1200
Total	1200

Employee Summary		
Employees	#	FTE
Fire Chief	1	1
Wildland Division	1	1
Fire Inspector/Fi	1	1
Assistant Fire Ins	1	1
Administrator	1	1
Shift Captain	2	2
Full Time Firefigl	3	3
Seasonal Firefigl	2	2
Volunteer Firefig	27	13.5
Total		25.5