MAYOR .................................................................................................................. Geoffrey Chesnut
COUNCIL MEMBER .......................................................................................... David Harris
COUNCIL MEMBER .......................................................................................... Katherine Ross
COUNCIL MEMBER .......................................................................................... Richard Jensen
COUNCIL MEMBER .......................................................................................... West Harris
COUNCIL MEMBER .......................................................................................... Shawn Stoor
CITY MANAGER ............................................................................................... Rob Dotson

PREPARED BY:

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PUBLIC SAFETY IMPACT FEE FACILITIES PLAN
I. EXECUTIVE SUMMARY

The purpose of this Public Safety Impact Fee Facilities Plan (IFFP) and Impact Fee Analysis (IFA) is to provide Enoch City with a summary of recommended capital improvements to meet the City’s existing and future demands for its public safety facilities. Public safety facilities include Fire and Emergency Medical Services (EMS) and Law Enforcement Services. This impact fee facilities plan identifies the existing Level of Service (LOS) for the Enoch City public safety facilities and identifies improvements needed to maintain the level of service throughout the planning period.

It is recommended that public safety improvements be implemented in a timely manner during the 20-year planning period to maintain the City’s current level of service. The total estimated cost of recommended future improvements is $3,222,000 as shown in Table V-4: Impact Fee Analysis. This includes the construction of new facilities for both fire and emergency medical services as well as law enforcement services. These recommended improvements will allow Enoch City to maintain the existing levels of service currently being experienced by the City for the public safety facilities.

The projected population at the end of the planning period estimates an increase of 2,380 Equivalent Residential Units (ERUs) over the planning period. With the total estimated costs of projects for each service divided by this growth in ERUs, a maximum allowable impact fee of $1,353.91 per ERU and a maximum allowable impact fee of $0.90 per square foot of commercial construction may be assessed by the City.
II. INTRODUCTION

This section provides background information, reviews the purpose and scope of this plan and analysis, and identifies the plan’s area or limits.

A. BACKGROUND

To help ensure that the City is prepared to meet the needs of anticipated growth and to ensure up-to-date information is considered in planning efforts, Enoch City has contracted with Sunrise Engineering, Inc. to provide this Public Safety Impact Fee Facilities Plan (IFFP) and Impact Fee Analysis (IFA).

This public safety impact fee facilities plan & impact fee analysis has been prepared for Enoch City, located in southern Utah, just to the north of Cedar City in the eastern portion of Iron County along Veterans Memorial Highway. An area and location map showing the location of Enoch City can be seen as Figure II-1 on the following page.

Enoch City is characterized by its semi-arid climate which is typically warm in the summer months and cold in the winter months. The average annual rainfall is approximately 12.5 inches, which is much less than one-third the national average of 38.1 inches. The average annual snowfall in Enoch is approximately 52.1 inches, which is almost double the national average of 27.8 inches.

Enoch City has experienced relatively consistent growth rates over the past twenty years, varying from 1.0% to 6.0%, with the exception for a few years during the recession from 2009-2011 when the population decreased by a few percent. The average population change over the last 20 years was approximately 3.85% per year.

B. PURPOSE

The purpose of the Enoch City public safety facilities system is to save lives, protect property, provide assistance during disasters, and aid recovery during emergencies. The Enoch City public safety facilities system is composed of the following organizations:

1. Fire and Emergency Medical Services
2. Law Enforcement Services

Public safety service providers have well-defined missions that require trained personnel and specialized vehicles, equipment, and tools.

C. SCOPE

The scope of this public safety impact fee facilities plan includes the following:

1. Estimate existing population and future growth projections.
2. Calculate the existing level of service.
3. Define the desired level of service.
4. Recommend public safety improvements needed to maintain the existing levels of service.
5. Identify possible financing and phasing options to assist Enoch City with constructing the recommended improvements.
Ultimately, the goal of this plan is to provide a general guide to the City for making decisions pertaining to future public safety facilities and to help avoid mistakes related to the lack of proper planning.

**D. IMPACT FEE RELATED ITEMS**

There are a few items related to impact fees that Enoch City staff should keep in mind when planning for, collecting, and expending impact fees. Generally, it is a good idea to update this plan at least every five years, or more frequently, if growth is significantly different than projected or other events necessitate it. City staff should be aware that, in conformance with Utah Code 11-36a-602, impact fees can only be expended for a system improvement that is identified in the impact fee facilities plan and that is for the specific public facility type for which the fee was collected (i.e. culinary water impact fees cannot be used for public safety projects). Also, impact fees must be expended or encumbered for a permissible use within six years of their receipt unless 11-36a-602(2)(b) applies. Lastly, City staff should also ensure that proper accounting of the impact fees occur (see Utah Code 11-36a-601).
III. USER ANALYSIS

An important element in any community plan is a user analysis or a projection of the City’s population growth rate. This projection gives the planner an idea of the future demands the City should plan for throughout the planning period. This section summarizes how the growth rate, planning period, population projections and capacity were calculated or obtained.

A. GROWTH RATES

Projecting the future population can be a subjective process. With this in mind, Table III-1 below shows the City’s historic growth rate according to the US Census Data. This data provides an idea of how the community has grown from 1970 to 2020.

Table III-1: Enoch City Historic Growth

<table>
<thead>
<tr>
<th>YEAR</th>
<th>CENSUS POPULATION</th>
<th>GROWTH RATE</th>
</tr>
</thead>
<tbody>
<tr>
<td>1970</td>
<td>120</td>
<td>-</td>
</tr>
<tr>
<td>1980</td>
<td>678</td>
<td>18.91%</td>
</tr>
<tr>
<td>1990</td>
<td>1,947</td>
<td>11.13%</td>
</tr>
<tr>
<td>2000</td>
<td>3,467</td>
<td>5.94%</td>
</tr>
<tr>
<td>2010</td>
<td>5,803</td>
<td>5.29%</td>
</tr>
<tr>
<td>2020</td>
<td>7,374</td>
<td>2.42%</td>
</tr>
<tr>
<td>Past 20-Year Growth</td>
<td>3.85%</td>
<td></td>
</tr>
</tbody>
</table>

As seen in Table III-1, Enoch City has grown significantly since 1970. Despite this rapid population growth, there has been very little commercial development in the City. The recession starting in 2008 caused a significant drop in the growth rate. Enoch City is primarily a residential community supporting the Iron County area.

Appendix A contains a table showing the yearly population estimates. Of note, the City’s average annual growth rate from the year 2000 to 2020 was 3.85%. For the purposes of this analysis, the projected average annual growth rate was rounded to 3.5%. This growth rate corresponds with the estimated growth rates for the City’s current impact fee facilities plans and impact fee analyses for its other utility and services systems.

The future population for each year was calculated using the compound interest formula and inserting the projected growth rate, the existing population, and the length of the planning horizon.

\[ F = P(1 + i)^n \]

Where,
F = Future Population
P = Present Population
i = Growth Rate (3.5%)
n = Years

Using the compound interest formula, and applying the assumed 3.5% growth rate yields the population and housing projections noted in Table III-2 and Figure III-1 Error! Reference source not found. below.
It is important to note that while estimating growth rates is essential to the planning process, whether actual growth rates match anticipated growth rates is relatively unimportant. In reality, if actual growth rates are greater than anticipated, both revenues and expenditures advance forward in time, so the net effect on cash flow remains relatively constant. Similarly, if actual growth rates are lower than anticipated, impact fee revenues and demand for improvements are simultaneously delayed and remain relatively constant.

### B. LENGTH OF PLANNING PERIOD

It is typical for an impact fee facilities plan to use a 10- or 20-year planning horizon or period. This plan assumes a 20-year planning horizon, noting the following points:

1. The City must expend or encumber collected impact fees for a permissible use within six years of their receipt.
2. Assumptions, objectives, goals, etc. can change within a 20-year period. This change in conditions may especially be realized if dramatic population changes take place within the 20-year planning horizon.
C. POPULATION CAPACITY

While population data for this plan has been taken from the census, it is important to note the population figures presented in this plan may not fully reflect the population capacity of Enoch City as it relates to total housing units. For example, the 2020 census reports 2,111 total housing units, but only 1,831 are occupied, with the remaining 280 being vacant. These vacant homes have been categorized as follows: for rent, rented but not occupied, for sale, sold but not occupied, seasonal, recreational, or occasional use, and vacant.

The population capacity for the 2020 census can be determined by taking the 2020 population divided by the number of housing units occupied and then multiplying by the total housing units as shown in the equation given below.

\[
\text{2020 Population Capacity:} \quad \left( \frac{7,374 \text{ people}}{1,830 \text{ units occupied}} \right) 2,110 \text{ units total} = 8,502 \text{ people}
\]

For non-census years, the ratio of total housing units to occupied housing units is assumed to remain constant. This ratio is multiplied by the projected population to determine the population capacity for that year. Calculations for the current and projected population capacity are illustrated in the following equations.

Current Population Capacity (2022):

\[
\left( \frac{2,260 \text{ units total}}{1,960 \text{ units occupied}} \right) 7,899 \text{ people} = 9,107 \text{ people}
\]

20-year Population Capacity (2042):

\[
\left( \frac{4,497 \text{ units total}}{3,900 \text{ units occupied}} \right) 15,718 \text{ people} = 18,121 \text{ people}
\]

The number of total housing units for a given year can be estimated using the 2020 population capacity and the 2020 census total housing unit number of 2,110. Alternatively, the number of total housing units can be calculated by taking the total population capacity and dividing it by the average household size of 4.03.

2020 Average People Per Household:

\[
\left( \frac{7,374 \text{ people}}{1,830 \text{ units occupied}} \right) = 4.03 \text{ people/unit}
\]

Current Occupied Housing Units (2022):

\[
\left( \frac{7,899 \text{ people}}{4.03 \text{ people/unit}} \right) = 1,960 \text{ occupied units}
\]

20-year Occupied Housing Units (2042):

\[
\left( \frac{15,718 \text{ people}}{4.03 \text{ people/unit}} \right) = 3,900 \text{ occupied units}
\]
Important values in the user analysis and population growth projections include the existing population, used as the denominator in the equation to calculate existing level of service, and total housing units, used as the denominator in the per-unit impact fee calculation. The total change in population over the 20-year planning period is estimated to be 7,819 people, and the change in total housing units (both occupied and other units) is estimated to be 2,237 units.

D. EQUIVALENT RESIDENTIAL UNITS

An Equivalent Residential Unit (ERU) is a standardized unit of measure implemented by many municipalities and service districts to equate non-residential (commercial, industrial, institutional) or multi-family residential properties to a specific number of single-family residences. In Enoch City’s case, property types include residential, commercial, institutional, agricultural, etc. Property types thought of as inducing a demand on public safety services include residential (housing) and commercial properties, and the scale of that demand per individual unit is assumed to be directly proportional to building floor space. Thus, for this plan, an ERU will be taken as the average square footage of a single-family residence, or one housing unit.

To calculate the Equivalent Residential Unit for this plan, square footage data of single-family residences (housing units) for Enoch City was received from an Iron County database and analyzed for average square footage of livable space per unit. Over one thousand residential units were analyzed, and the average livable floor space was calculated to be 1,496 square feet. The twenty-four commercial units in Enoch City were also analyzed, and the average square footage of floor space in these commercial entities was found to be 8,972 square feet. Thus, one ERU is 1,496 square feet of residential (housing unit) floor space and since 8,972 is six times greater than 1,496, one commercial unit is on average equal to 6.00 ERUs. The analysis is summarized in Table III-3 below.

<table>
<thead>
<tr>
<th>PROPERTY TYPE</th>
<th>TOTAL UNITS</th>
<th>TOTAL AREA (SF)</th>
<th>AVERAGE AREA (SF)</th>
<th>ERUs per UNIT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential</td>
<td>1,024</td>
<td>1,532,075</td>
<td>1,496</td>
<td>1.00</td>
</tr>
<tr>
<td>Commercial</td>
<td>24</td>
<td>215,335</td>
<td>8,972</td>
<td>6.00</td>
</tr>
<tr>
<td>Total</td>
<td>1,048</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

Based on the calculations summarized above, for non-residential units, the ERU value will be determined in this plan by taking the total square footage of the building, including multiple stories, and dividing by the average residential square footage of 1,496. Any building or unit that has a square footage less than the average residential unit will be considered as 1.0 ERU. Anticipated growth in both residential housing units and commercial units and their corresponding ERUs over the planning horizon is given Table III-4 below, with additional detail provided in Appendix A.

<table>
<thead>
<tr>
<th>YEAR</th>
<th>TOTAL HOUSING UNITS</th>
<th>RESIDENTIAL ERUs</th>
<th>TOTAL COMMERCIAL UNITS</th>
<th>COMMERCIAL ERUs</th>
<th>TOTAL ERUs</th>
</tr>
</thead>
<tbody>
<tr>
<td>2022</td>
<td>2,260</td>
<td>2,260</td>
<td>24</td>
<td>144</td>
<td>2,404</td>
</tr>
<tr>
<td>2032</td>
<td>3,188</td>
<td>3,188</td>
<td>34</td>
<td>203</td>
<td>3,391</td>
</tr>
<tr>
<td>2042</td>
<td>4,497</td>
<td>4,497</td>
<td>48</td>
<td>287</td>
<td>4,784</td>
</tr>
</tbody>
</table>
The existing ERUs will be used to calculate an existing level of service and projected ERUs will be used to calculate the future demand. By assuming that the current number of ERUs will grow at the same rate as the population, e.g., 3.5% annually, we estimate the future total number of ERUs per property type. Anticipated growth over the 20-year planning period is as given in the calculations below.

20-year Change in Residential ERUs:

\[ 4,497 \text{ Future ERUs} - 2,260 \text{ Existing ERUs} = 2,237 \text{ ERUs} \]

20-year Change in Commercial ERUs:

\[ 287 \text{ Future ERUs} - 144 \text{ Existing ERUs} = 143 \text{ ERUs} \]

20-year Change in Total ERUs:

\[ 4,784 \text{ Future ERUs} - 2,404 \text{ ERUs} = 2,380 \text{ ERUs} \]

Thus, growth in the City over the 20-year planning period, as expressed in equivalent residential units (ERUs) is anticipated to be 2,380 units. This number is used as the basis for calculating the maximum allowable impact fee for new residential and commercial units.
IV. PUBLIC SAFETY FACILITIES

The primary reason Enoch City has experienced tremendous growth in the past 40 years is the quality of life it offers. The City strives to maintain proper planning so that this level of quality is maintained and enhanced. This section identifies the current public safety facility services available and demand requirements for these services based on continued population growth.

A. EXISTING FACILITIES

Enoch City currently provides fire and emergency medical services in partnership with Cedar City through an interlocal agreement between the entities; the service-providing entity is the Cedar City Fire Department, and the agreement provides fire protection and wildland fire interface management for Enoch City. By contrast, the City currently provides in-house law enforcement services for its community through its Enoch City Police Department.

a) Fire & Emergency Medical Services

The Cedar City Fire Department has operated since 1917 and has contracted with various local governmental entities to provide fire protection services. Through the current agreement, the fixed manpower and equipment costs associated with fire protection, whether the fire department responds to any emergency or not, is shared by the participating entities. This cost share is primarily calculated via a market taxable value and pays a percentage equal to the proportionate share of the covered area.

For the purposes of this analysis, the fire station closest to Enoch City that provides services to the City will be included in calculating the existing Level of Service (LOS). This closest station is Cedar City Fire Station #2, located at 2580 North Commerce Center in Cedar City. The station was constructed in 2000 with a concrete masonry unit block shell and wood framing inside. With a total footprint of 5,200 square feet, the structure consists of two apparatus bays, four bedrooms with twin beds, men’s and women’s bathrooms with showers, a small kitchen, and an office. The station is not currently manned. The station was also not constructed to NFPA standards or to meet future needs of a fire department. Error! Reference source not found. is a photo of the referenced station.
b) Law Enforcement Services
The Enoch City Police Department was founded in October 2002 and is currently staffed by seven full-time officers and two part-time officers. The department currently has one law enforcement facility located at the Enoch City office building. According to the City, the police department uses 22% of the office building, or 1,041 square feet of the total 4,730 square feet. This area consists of both the designated police station and the communal area available to each department. The police department also utilizes 115 square feet of the public works building. Together, the total floor space available for law enforcement services is 1,156 square feet. The Enoch City police station, located at the Enoch City Offices at 900 E Midvalley Road is shown in Figure IV-2 below.

Also included in law enforcement services is the Enoch City Animal Shelter which is owned and operated by the City. The facility is located at 6347 N 650 East and comprises approximately 4,150 square feet of service area. Because the facility has sufficient capacity for the foreseeable future and there is no outstanding debt on the facility, no additional improvements are being recommended and no costs are being included in the impact fee facilities plan and impact fee analysis.

Figure IV-2: Enoch City Police Station (Enoch City Offices)

c) Summary of Existing Facilities
Table IV-1 summarizes the public safety facilities currently being utilized by Enoch City.

Table IV-1: Summary of Public Safety Facilities

<table>
<thead>
<tr>
<th>SERVICE</th>
<th>FACILITY</th>
<th>LOCATION</th>
<th>FLOOR SPACE (SF)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fire &amp; EMS</td>
<td>Fire Station #2</td>
<td>2580 N Commerce Center</td>
<td>5,200</td>
</tr>
<tr>
<td>Law Enforcement</td>
<td>Enoch City Offices</td>
<td>900 E Midvalley Road</td>
<td>1,041</td>
</tr>
<tr>
<td>Law Enforcement</td>
<td>Public Works Building</td>
<td>4864 N. 600 East</td>
<td>115</td>
</tr>
<tr>
<td>Law Enforcement</td>
<td>Animal Shelter</td>
<td>6347 N. 650 East</td>
<td>4,150</td>
</tr>
</tbody>
</table>

B. DEMAND ANALYSIS
It is necessary to establish a Level of Service (LOS) to evaluate the public safety facilities services and recommend improvements necessary to maintain that level of service with growth through the planning period. The LOS indicates the capacity per unit of demand for each public facility or service. In the case of
public safety, the LOS is determined by square feet of a public facility type per ERU. Because fire and emergency medical services differ from law enforcement services, the existing LOS for each service type is calculated separately. Similarly, demands which will be induced by new growth will be calculated separately for each facility type and will be based on the projected growth in ERUs over the planning period.

The calculated existing LOS for fire and emergency medical services is 2.16 square feet of floor space per ERU and the calculated existing LOS for law enforcement services is 0.48 square feet of floor space per ERU, as illustrated in Table IV-2 below.

<table>
<thead>
<tr>
<th>SERVICE</th>
<th>FLOOR SPACE (SF)</th>
<th>EXISTING ERUs</th>
<th>EXISTING LOS (SF/ERU)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fire &amp; EMS</td>
<td>5,200</td>
<td>2,404</td>
<td>2.16</td>
</tr>
<tr>
<td>Law Enforcement</td>
<td>1,156</td>
<td>2,404</td>
<td>0.48</td>
</tr>
</tbody>
</table>

a) Additional Fire & EMS Services

The existing Fire Station #2 located in Cedar City has a total building footprint of 5,200 square feet. This facility serves the existing 2,404 ERUs at a rate of 2.16 square feet per ERU. In order to calculate the additional facility necessary to provide the same LOS over the 20-year planning horizon, the difference between the existing 2,404 ERUs and the 20-year future total 4,784 ERUs is multiplied by the 2.16 square feet per ERU as in the equation below:

\[
(4,784 \text{ Future ERUs} - 2,404 \text{ Existing ERUs}) \times 2.16 \frac{SF}{ERU} = 5,140 SF
\]

In summary, Enoch City needs to provide an additional 5,140 square feet of fire and emergency medical services either of its own accord or through the interlocal agreement with Cedar City or another entity to maintain the same level of service over the planning period as is currently being experienced by existing residents. Table IV-3 summarizes this calculation for both the 10-year and 20-year planning horizon.

<table>
<thead>
<tr>
<th>PLANNING HORIZON</th>
<th>FUTURE ERUs</th>
<th>GROWTH IN ERUs</th>
<th>EXISTING LOS (SF/ERU)</th>
<th>REQUIRED SERVICE (SF)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Current</td>
<td>2,404</td>
<td>0</td>
<td>2.16</td>
<td>0</td>
</tr>
<tr>
<td>10-Year</td>
<td>3,391</td>
<td>987</td>
<td>2.16</td>
<td>2,132</td>
</tr>
<tr>
<td>20-Year</td>
<td>4,784</td>
<td>2,380</td>
<td>2.16</td>
<td>5,140</td>
</tr>
</tbody>
</table>

With consistent growth in Enoch City, it is recommended that an additional fire station be built to accommodate the expected growth. It is anticipated that a new station will be built near the intersection of SR-130 (Veteran’s Memorial Highway) and 3000 North. Approval of this location will need to be granted by Cedar City’s City Council. This location is favorable because it supports good 5-minute response times in Enoch City and surrounding areas (see maps in Appendix C).

b) Additional Law Enforcement Services

The existing law enforcement services located in Enoch City utilize a total square footage of 1,156 square feet. This facility serves the existing 2,404 ERUs at a rate of 0.48 square feet per ERU. To calculate the additional
facility necessary to provide the same LOS over the 20-year planning horizon, the difference between the existing 2,404 ERUs and the 20-year future total 4,784 ERUs is multiplied by the 0.48 square feet per ERU as in the equation below:

$$20\text{-year Required Additional Facility: } \left(4,784 \text{ Future ERUs} - 2,404 \text{ Existing ERUs}\right) \times 0.48 \frac{SF}{ERU} = 1,142 \text{ SF}$$

In summary, Enoch City needs to provide an additional 1,142 square feet of law enforcement services to maintain the same level of service over the planning period as is currently being experienced by existing residents. Table IV-4 summarizes this calculation for both the 10-year and 20-year planning horizon.

<table>
<thead>
<tr>
<th>PLANNING HORIZON</th>
<th>FUTURE ERUs</th>
<th>GROWTH IN ERUs</th>
<th>EXISTING LOS (SF/ERU)</th>
<th>REQUIRED SERVICE (SF)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Current</td>
<td>2,404</td>
<td>0</td>
<td>0.48</td>
<td>0</td>
</tr>
<tr>
<td>10-Year</td>
<td>3,391</td>
<td>987</td>
<td>0.48</td>
<td>474</td>
</tr>
<tr>
<td>20-Year</td>
<td>4,784</td>
<td>2,380</td>
<td>0.48</td>
<td>1,142</td>
</tr>
</tbody>
</table>

The calculations show that additional law enforcement services will be required and that an impact fee for this expansion is justified to maintain the same level of service as is currently being experienced by existing residents. If the City deems that the existing level of service is not satisfactory, it may choose to build a larger building than calculated above. If this occurs, the additional square footage will need to be funded by resources other than impact fees; the only impact fee eligible improvement is the 1,142 square feet presented above.

As noted in Section IV.EXISTING FACILITIES.A.b) above, the City’s animal control facility has sufficient capacity for the foreseeable future and there is no outstanding debt on the facility. Thus, no additional improvements are being recommended as part of this plan, and no costs are included in the impact fee facilities plan and impact fee analysis.

C. RESPONSE TIMES
The response time of a public safety service is the amount of time it takes for emergency responders to arrive at an incident after an emergency call has been received. Quick response times are an important part of public safety service. Enoch City public safety staff have communicated that they would like to set a goal of 10 minutes or less for their response.

Each public safety station’s response time was mapped and evaluated. The response time maps can be seen in Appendix C. It should be noted that law enforcement response times are hard to evaluate as it often depends on the locations of law enforcement vehicles and availability. Fire and emergency medical services are normally easier to evaluate because their services are typically stationed until a call is received.

The response time map results show that most areas in Enoch City are within a 10-minute response time area for fire and emergency medical services; however, there is a small area in the northern part of the City that has a response time greater than 10 minutes. Included in Appendix D are maps of two potential new fire station locations with response times illustrated. Of note, the location of a new fire station will impact the service time coverage for all of Enoch City boundaries.
V. PUBLIC SAFETY IMPACT FEE ANALYSIS

The final component of an impact fee facilities plan is a calculation of required improvement costs attributable to growth within the designated planning period and the division of those costs among units of anticipated growth. This calculation is referred to as the impact fee analysis. The resulting impact fee is a fee which may be imposed by a municipal entity upon future development activity as a condition of development approval. The calculation and assessment of impact fees by a municipality shall be done in accordance with Utah’s Impact Fee Act (11-36a-602 of the Utah Code).

A. EXISTING IMPACT FEE

Enoch City’s existing public safety impact fee is referred to as the “Police” impact fee and is set at $100 for a single-family residential unit (ERU) and $19.87 per unit for units in a multi-family residential facility. The current impact fee was set when the police department was first established by the City.

B. PROPOSED IMPACT FEE

The preceding impact fee facilities plan establishes a Level of Service (LOS) currently being experienced by citizens of Enoch City and calculates the demand on the City’s public safety facilities that will be induced by growth within the planning period. As summarized in Section IV, Enoch City needs to provide an additional 5,140 square feet of fire and emergency medical services and an additional 1,142 square feet of law enforcement services to maintain the same level of service over the planning period.

a) Project Unit Costs

In order to calculate anticipated unit costs for the needed fire and emergency services and law enforcement services, two resources were reviewed, including: 1) construction costs from prior Sunrise Engineering fire station projects (see Table V-1 below), and 2) the RS Means 2022 Construction Project Costs Per Square Foot (see Table V-2 below).

<table>
<thead>
<tr>
<th>PROJECT</th>
<th>FLOOR AREA (SF)</th>
<th>CONSTRUCTION COST</th>
<th>CONSTRUCTION YEAR</th>
<th>2022 CONSTRUCTION COST</th>
<th>2022 UNIT COST ($/SF)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Caliente Fire Station</td>
<td>8,750</td>
<td>$760,000</td>
<td>2010</td>
<td>$1,083,578</td>
<td>$124</td>
</tr>
<tr>
<td>Delta Fire Station</td>
<td>19,500</td>
<td>$2,400,000</td>
<td>2016</td>
<td>$2,865,726</td>
<td>$147</td>
</tr>
<tr>
<td>Orderville Fire Station</td>
<td>6,020</td>
<td>$422,000</td>
<td>2009</td>
<td>$619,721</td>
<td>$103</td>
</tr>
<tr>
<td>Gunnison Fire Station</td>
<td>12,000</td>
<td>$1,500,000</td>
<td>2010</td>
<td>$2,138,641</td>
<td>$178</td>
</tr>
<tr>
<td>Manila Fire Station</td>
<td>7,000</td>
<td>$583,000</td>
<td>2012</td>
<td>$783,503</td>
<td>$112</td>
</tr>
<tr>
<td>Elk Meadows Fire Station</td>
<td>4,250</td>
<td>$460,000</td>
<td>2013</td>
<td>$600,196</td>
<td>$141</td>
</tr>
<tr>
<td>CMFPD Fire Station</td>
<td>2,610</td>
<td>$638,022</td>
<td>2020</td>
<td>$676,878</td>
<td>$259</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>FACILITY</th>
<th>25th %-tile</th>
<th>MEDIAN</th>
<th>75th %-tile</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fire Stations</td>
<td>$236</td>
<td>$269</td>
<td>$375</td>
</tr>
<tr>
<td>Police Stations</td>
<td>$244</td>
<td>$340</td>
<td>$375</td>
</tr>
<tr>
<td>Police/Fire</td>
<td>$187</td>
<td>$193</td>
<td>$700</td>
</tr>
<tr>
<td>AVERAGE</td>
<td>$222</td>
<td>$267</td>
<td>$483</td>
</tr>
</tbody>
</table>
Taking the per-square-foot construction cost of Sunrise Engineering’s most recent fire station project in 2022 prices at $259 and the RS Means average median construction cost for fire and police stations at $267 dollars suggests a reasonable per-square-foot construction cost of $265 dollars. Assuming professional and incidental costs at a rate of 18% of construction costs yields a $313 per square foot project cost.

<table>
<thead>
<tr>
<th>ITEM</th>
<th>COST</th>
</tr>
</thead>
<tbody>
<tr>
<td>2022 Construction Cost</td>
<td>$265</td>
</tr>
<tr>
<td>Incidents @ 18%</td>
<td>$48</td>
</tr>
<tr>
<td><strong>Total Project Unit Cost ($/SF)</strong></td>
<td><strong>$313</strong></td>
</tr>
</tbody>
</table>

### b) Land Costs

Whereas land costs are an eligible expense under Utah’s Impact Fee Act, and it is assumed that the City will need to purchase property upon which to construct the improvements proposed by this plan, a review of current undeveloped land prices in Enoch City and vicinity was completed. The review was based on online real estate listings for undeveloped land at the time of plan preparation, coupled with discussions with Enoch City leadership regarding their knowledge of the current real estate market. Based on this review, it was concluded that a reasonable expectation for the City’s cost of land is $30,000 per acre. Figure V-1 illustrates current advertised land costs from the online listings with a trendline added.

![Figure V-1: Current Undeveloped Land Costs](image)

### c) Impact Fee Calculation

The Utah Impact Fee Act allows the costs of new improvements, land, inflation, financing, and planning to be included in the impact fee analysis. As noted previously, the total project unit cost is anticipated to be $313 per square foot for building improvements and the land cost is assumed to be $30,000 per acre. For the purposes of this impact fee analysis, the rate of inflation, or construction cost escalation, is assumed to be 3.0% annually. It is also assumed that the City will bond for the improvements at public financing rates. For this impact fee analysis, a 20-year term at 2.5% annual interest is assumed. Finally, since the proposed improvements are recommended solely to support new growth, the improvements are 100% impact fee
eligible. The calculated maximum allowable impact fee per residential unit is $1,353.91, as demonstrated in Table V-4.

Table V-4: Impact Fee Analysis

<table>
<thead>
<tr>
<th>Facility Costs:</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Facility</td>
<td>Demand (SF)</td>
<td>Unit Cost</td>
</tr>
<tr>
<td>Fire &amp; EMS</td>
<td>5,140</td>
<td>$313</td>
</tr>
<tr>
<td>Law Enforcement</td>
<td>1,142</td>
<td>$313</td>
</tr>
<tr>
<td><strong>Total 2022 Facility Costs:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Land Costs:</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Facility</td>
<td>Lot Size (AC)</td>
<td>Unit Cost</td>
</tr>
<tr>
<td>Fire &amp; EMS</td>
<td>1.0</td>
<td>$30,000</td>
</tr>
<tr>
<td>Law Enforcement</td>
<td>0.5</td>
<td>$30,000</td>
</tr>
<tr>
<td><strong>Total 2022 Land Costs:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Inflated Project Costs:**
- Assumed Construction Year: 2028
- Assumed Inflation Rate: 3.0%
- Inflated Fire & EMS Facility and Land Costs: $1,957,000
- Inflated Law Enforcement Facility and Land Costs: $445,000
| **Total Inflated Facility & Land Costs:** | | | **$2,402,000** |

**Financed, Inflated Project Costs:**
- Assumed Financed Term (Years): 20
- Assumed Financed Rate (%): 2.5%
- Financed, Inflated Fire & EMS Facility and Land Costs: $2,511,000
- Financed, Inflated Law Enforcement Facility and Land Costs: $571,000
| **Total Financed, Inflated Facility & Land Costs** | | | **$3,082,000** |

**Planning Costs:**
<table>
<thead>
<tr>
<th>Planning Effort</th>
<th>Year</th>
<th>Planning Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>IFFP &amp; IFA Update No. 1</td>
<td>2027</td>
<td>$28,000</td>
</tr>
<tr>
<td>IFFP &amp; IFA Update No. 2</td>
<td>2032</td>
<td>$32,000</td>
</tr>
<tr>
<td>IFFP &amp; IFA Update No. 3</td>
<td>2037</td>
<td>$37,000</td>
</tr>
<tr>
<td>IFFP &amp; IFA Update No. 4</td>
<td>2042</td>
<td>$43,000</td>
</tr>
<tr>
<td><strong>Total Planning Costs:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**TOTAL IMPACT FEE ELIGIBLE COSTS (Project + Planning Costs):** $3,222,000

Impact Fee Analysis:
- Existing 2022 ERUs: 2,404
- Future 2042 ERUs: 4,784
- **20-Year ERU Growth (2042 ERUs - 2022 ERUs):** 2,380

**MAXIMUM ALLOWABLE IMPACT FEE ($/ERU):**
(Total Impact Fee Eligible Costs ÷ 20-Year ERU Growth): $1,353.91
d) Commercial Impact Fee

Whereas commercial units vary significantly in size and purpose, and it has heretofore been calculated that, on average, one commercial unit in Enoch City represents 6.0 equivalent residential units (see Table III-3: ERU Analysis), it is reasonable that the City assess commercial impact fees on a per-square-foot basis. The calculation is based on the typical residential unit and the residential unit impact fee as follows:

\[
\frac{1,353.91}{1,496} = 0.90 \text{ per Square Feet}
\]

Thus, this impact fee analysis recommends the maximum allowable impact fee for new commercial units as $0.90 per square foot of building footprint. As an example, if the average commercial unit size of 8,972 square feet is used (see Table III-3), the public safety impact fee for that unit would be $8,074.80.

Table V-5: Commercial Impact Fee

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Maximum Allowable Impact Fee ($/ERU)</td>
<td>$1,353.91</td>
</tr>
<tr>
<td>Average Residential Floor Area (SF/ERU)</td>
<td>1,496</td>
</tr>
<tr>
<td>Maximum Allowable Impact Fee ($/SF)</td>
<td>$0.90</td>
</tr>
</tbody>
</table>

e) General Guidance

The residential and commercial impact fees proposed herein represent the maximum amounts the City may enact per Utah’s Impact Fee Act. Ultimately, the City may adopt any impact fee levels it deems appropriate as long as it does not exceed the amounts presented herein. Obviously, if the City adopts a lower impact fee than recommended, the risk exists that insufficient funds will be available to implement the recommended improvements and, over time, a reduced level of service will become apparent unless funding from sources other than impact fees are committed to making the recommended improvements.

Furthermore, if the City determines that the existing public safety levels of service are inadequate, it may choose to raise the level of service through the investment of other funding sources in the public safety facilities. The Impact Fee Act does preclude a municipality from raising the level of service via the application of impact fee funds; thus the other funding would need to come from general funds, bonding, grants, or other resources not related to impact fees.

D. TIMING OF EXPENDITURES

Current provisions of the Impact Fee Act require that a municipality shall expend or encumber impact fees for a permissible use within six years of receipt. The provisions also allow a municipality to hold the fees longer than six years if it identifies in writing, an extraordinary and compelling reason why the fees should be held longer than six years, and an absolute date by which the fees will be expended. It is imperative that the City be familiar with the requirements of the Impact Fee Act and comply accordingly.

E. IMPACT FEE CASH FLOW

A demonstration of how public safety impact fees are expected to be received and expended by the City over the planning period and through the end of debt service obligations is provided in Appendix E as a cash flow analysis. The analysis assumes that the City will enact the impact fees proposed herein, then bond for and
construct the recommended improvements in the year 2028. It also assumes the City will update the public safety impact fee facilities plan and impact fee analysis approximately every five years as recommended. The figures shown below illustrate that the impact fees collected through the 20-year planning period (2022-2042) support implementation of the recommended improvements and are expended fully at the end of the debt service horizon in 2048 (assuming the 20-year debt service is initiated in year 2028).
APPENDIX A
POPULATION PROJECTIONS
<table>
<thead>
<tr>
<th>Year</th>
<th>Population</th>
<th>Population Capacity</th>
<th>Occupied Households</th>
<th>Total Housing Units</th>
<th>Commercial Units</th>
<th>Commercial ERUs</th>
<th>Growth Rate (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
<td>5,803</td>
<td>6,690</td>
<td>1,440</td>
<td>1,660</td>
<td>-</td>
<td>-</td>
<td>5.3%</td>
</tr>
<tr>
<td>2011</td>
<td>5,944</td>
<td>6,853</td>
<td>1,475</td>
<td>1,700</td>
<td>-</td>
<td>-</td>
<td>2.4%</td>
</tr>
<tr>
<td>2012</td>
<td>6,088</td>
<td>7,019</td>
<td>1,511</td>
<td>1,742</td>
<td>-</td>
<td>-</td>
<td>2.4%</td>
</tr>
<tr>
<td>2013</td>
<td>6,235</td>
<td>7,189</td>
<td>1,547</td>
<td>1,784</td>
<td>-</td>
<td>-</td>
<td>2.4%</td>
</tr>
<tr>
<td>2014</td>
<td>6,387</td>
<td>7,363</td>
<td>1,585</td>
<td>1,827</td>
<td>-</td>
<td>-</td>
<td>2.4%</td>
</tr>
<tr>
<td>2015</td>
<td>6,542</td>
<td>7,542</td>
<td>1,623</td>
<td>1,871</td>
<td>-</td>
<td>-</td>
<td>2.4%</td>
</tr>
<tr>
<td>2016</td>
<td>6,700</td>
<td>7,725</td>
<td>1,663</td>
<td>1,917</td>
<td>-</td>
<td>-</td>
<td>2.4%</td>
</tr>
<tr>
<td>2017</td>
<td>6,863</td>
<td>7,912</td>
<td>1,703</td>
<td>1,963</td>
<td>-</td>
<td>-</td>
<td>2.4%</td>
</tr>
<tr>
<td>2018</td>
<td>7,029</td>
<td>8,104</td>
<td>1,744</td>
<td>2,011</td>
<td>-</td>
<td>-</td>
<td>2.4%</td>
</tr>
<tr>
<td>2019</td>
<td>7,199</td>
<td>8,300</td>
<td>1,786</td>
<td>2,060</td>
<td>-</td>
<td>-</td>
<td>2.4%</td>
</tr>
<tr>
<td>2020</td>
<td>7,374</td>
<td>8,502</td>
<td>1,830</td>
<td>2,110</td>
<td>-</td>
<td>-</td>
<td>2.4%</td>
</tr>
<tr>
<td>2021</td>
<td>7,632</td>
<td>8,799</td>
<td>1,894</td>
<td>2,183</td>
<td>-</td>
<td>-</td>
<td>3.5%</td>
</tr>
<tr>
<td>2022</td>
<td>7,899</td>
<td>9,107</td>
<td>1,960</td>
<td>2,260</td>
<td>24</td>
<td>144</td>
<td>3.5%</td>
</tr>
<tr>
<td>2023</td>
<td>8,176</td>
<td>9,426</td>
<td>2,029</td>
<td>2,339</td>
<td>25</td>
<td>149</td>
<td>3.5%</td>
</tr>
<tr>
<td>2024</td>
<td>8,462</td>
<td>9,756</td>
<td>2,100</td>
<td>2,421</td>
<td>26</td>
<td>154</td>
<td>3.5%</td>
</tr>
<tr>
<td>2025</td>
<td>8,758</td>
<td>10,097</td>
<td>2,173</td>
<td>2,506</td>
<td>27</td>
<td>160</td>
<td>3.5%</td>
</tr>
<tr>
<td>2026</td>
<td>9,065</td>
<td>10,451</td>
<td>2,249</td>
<td>2,593</td>
<td>28</td>
<td>165</td>
<td>3.5%</td>
</tr>
<tr>
<td>2027</td>
<td>9,382</td>
<td>10,816</td>
<td>2,328</td>
<td>2,684</td>
<td>29</td>
<td>171</td>
<td>3.5%</td>
</tr>
<tr>
<td>2028</td>
<td>9,710</td>
<td>11,195</td>
<td>2,409</td>
<td>2,778</td>
<td>30</td>
<td>177</td>
<td>3.5%</td>
</tr>
<tr>
<td>2029</td>
<td>10,050</td>
<td>11,587</td>
<td>2,494</td>
<td>2,875</td>
<td>31</td>
<td>183</td>
<td>3.5%</td>
</tr>
<tr>
<td>2030</td>
<td>10,402</td>
<td>11,992</td>
<td>2,581</td>
<td>2,976</td>
<td>32</td>
<td>190</td>
<td>3.5%</td>
</tr>
<tr>
<td>2031</td>
<td>10,766</td>
<td>12,412</td>
<td>2,671</td>
<td>3,080</td>
<td>33</td>
<td>196</td>
<td>3.5%</td>
</tr>
<tr>
<td>2032</td>
<td>11,143</td>
<td>12,847</td>
<td>2,765</td>
<td>3,188</td>
<td>34</td>
<td>203</td>
<td>3.5%</td>
</tr>
<tr>
<td>2033</td>
<td>11,533</td>
<td>13,296</td>
<td>2,862</td>
<td>3,299</td>
<td>35</td>
<td>210</td>
<td>3.5%</td>
</tr>
<tr>
<td>2034</td>
<td>11,936</td>
<td>13,762</td>
<td>2,962</td>
<td>3,415</td>
<td>36</td>
<td>218</td>
<td>3.5%</td>
</tr>
<tr>
<td>2035</td>
<td>12,354</td>
<td>14,243</td>
<td>3,066</td>
<td>3,534</td>
<td>38</td>
<td>225</td>
<td>3.5%</td>
</tr>
<tr>
<td>2036</td>
<td>12,786</td>
<td>14,742</td>
<td>3,173</td>
<td>3,658</td>
<td>39</td>
<td>233</td>
<td>3.5%</td>
</tr>
<tr>
<td>2037</td>
<td>13,234</td>
<td>15,258</td>
<td>3,284</td>
<td>3,786</td>
<td>40</td>
<td>241</td>
<td>3.5%</td>
</tr>
<tr>
<td>2038</td>
<td>13,697</td>
<td>15,792</td>
<td>3,399</td>
<td>3,919</td>
<td>42</td>
<td>250</td>
<td>3.5%</td>
</tr>
<tr>
<td>2039</td>
<td>14,177</td>
<td>16,344</td>
<td>3,518</td>
<td>4,056</td>
<td>43</td>
<td>258</td>
<td>3.5%</td>
</tr>
<tr>
<td>2040</td>
<td>14,673</td>
<td>16,916</td>
<td>3,641</td>
<td>4,198</td>
<td>45</td>
<td>267</td>
<td>3.5%</td>
</tr>
<tr>
<td>2041</td>
<td>15,186</td>
<td>17,509</td>
<td>3,768</td>
<td>4,345</td>
<td>46</td>
<td>277</td>
<td>3.5%</td>
</tr>
<tr>
<td>2042</td>
<td>15,718</td>
<td>18,121</td>
<td>3,900</td>
<td>4,497</td>
<td>48</td>
<td>287</td>
<td>3.5%</td>
</tr>
<tr>
<td>2043</td>
<td>16,268</td>
<td>18,756</td>
<td>4,037</td>
<td>4,654</td>
<td>49</td>
<td>297</td>
<td>3.5%</td>
</tr>
<tr>
<td>2044</td>
<td>16,837</td>
<td>19,412</td>
<td>4,178</td>
<td>4,817</td>
<td>51</td>
<td>307</td>
<td>3.5%</td>
</tr>
<tr>
<td>2045</td>
<td>17,427</td>
<td>20,091</td>
<td>4,324</td>
<td>4,985</td>
<td>53</td>
<td>318</td>
<td>3.5%</td>
</tr>
<tr>
<td>2046</td>
<td>18,036</td>
<td>20,795</td>
<td>4,476</td>
<td>5,160</td>
<td>55</td>
<td>329</td>
<td>3.5%</td>
</tr>
<tr>
<td>2047</td>
<td>18,668</td>
<td>21,522</td>
<td>4,632</td>
<td>5,341</td>
<td>57</td>
<td>340</td>
<td>3.5%</td>
</tr>
<tr>
<td>2048</td>
<td>19,321</td>
<td>22,276</td>
<td>4,794</td>
<td>5,527</td>
<td>59</td>
<td>352</td>
<td>3.5%</td>
</tr>
<tr>
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<td>3.5%</td>
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APPENDIX B
EXISTING FACILITIES MAP
Enoch City Public Safety Master Plan
Location Map

Map Legend

- Enoch City Municipality

Figure 1

Project Location

130
15
E 4800 N
N
Fort Johnson
Enoch

W 4800 N

130
130

SEI NO. 07795
DESIGNED MG
DRAWN CD
CHECKED JP

Updated 1/30/2023

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APPENDIX C
RESPONSE TIME MAPS
Enoch City Public Safety Master Plan
Enoch City Fire & Rescue Existing Response Times

Enoch City Fire Station #2 - 5 Minute Response
Enoch City Fire Station #3 - 5 Minute Response
Enoch City Fire Station #2 - 10 Minute Response
Enoch City Fire Station #3 - 10 Minute Response

Map Legend
- Fire Station
- City Hall
- Animal Control
- Public Works
- Enoch City Municipality
- Cedar City Municipality

Scale: 1in=4,500ft

Figure 3A
Updated 1/30/2023
APPENDIX D
POTENTIAL FIRE STATION LOCATIONS
Enoch City Public Safety Master Plan
Enoch Fire & Rescue Potential Response Times Option 1 (Cedar City)

Map Legend
Updated 1/30/2023
Enoch City Public Safety Master Plan
Enoch Fire & Rescue Potential Response Times Option 1 (Cedar City)

Figure 4A
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Enoch City Municipality
Cedar City Municipality
5 Minute Potential Service Area
10 Minute Potential Service Area

Potential Fire Station #4
(Cedar City)

5in=4,500ft

0 4,500 9,000

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SEI NO. 07795 DESIGNED MG DRAWN CD CHECKED JP Updated 1/30/2023
Enoch City Public Safety Master Plan
Enoch Fire & Rescue Potential Response Times Option 2 (Enoch City)

Map Legend

- Potential Fire Station
- 5 Minute Potential Service Area
- 10 Minute Potential Service Area
- Enoch City Municipality
- Cedar City Municipality

Legend:
- 1in=4,500ft
- 5 Minute Potential Service Area
- 10 Minute Potential Service Area

Figure 4B

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APPENDIX E
CASH FLOW SPREADSHEET
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</table>

**PUBLIC SAFETY IMPACT FEE FACILITIES PLAN & IMPACT FEE ANALYSIS | Enoch City**

**PUBLIC SAFETY**

**SUNRISE ENGINEERING**
APPENDIX F
CERTIFICATION OF IMPACT FEE ANALYSIS
CERTIFICATION OF IMPACT FEE ANALYSIS BY CONSULTANT

In accordance with Utah Code Annotated § 11-36a-306, Joseph K. Phillips, P.E., on behalf of Sunrise Engineering, Inc., make the following certification:

I certify that the attached Impact Fee Facilities Plan and 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; or
   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;

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.

Joseph K. Phillips, P.E., makes this certification with the following qualifications:

1. All of the recommendations for implementation of the Impact Fee Facilities Plan (“IFFP”) made in the IFFP documents or in the Impact Fee Analysis (“IFA”) documents, together the “IFFPA”, are followed in their entirety by Enoch City, Utah, staff, and elected officials.

2. If all or portion(s) of the IFFPA are modified or amended, this certification is no longer valid.

3. All information provided to Sunrise Engineering, Inc., its contractors or suppliers, is assumed to be correct, complete and accurate. This includes information provided by Enoch City, Utah, and outside sources.

4. The undersigned is trained and licensed as a professional engineer and has not been trained or licensed as an attorney at law. Nothing in the foregoing certification shall be deemed an opinion of law or an opinion of compliance with law which under applicable professional licensing laws or regulations or other laws or regulations must be rendered by an attorney licensed in the State of Utah.
5. The foregoing certification is an expression of professional opinion based on the undersigned’s best knowledge, information and belief and shall not be construed as a warranty or guaranty of any fact or circumstance.

6. The foregoing certification is made only to Enoch City, Utah, and may not be used or relied upon by any other person or entity without the express written authorization of the undersigned.

Sunrise Engineering, Inc.

By: _________________________

Dated: ______________________

[Red stamp with "DRAFT"]
APPENDIX G
ORDINANCE