



# Capital Improvements Advisory Committee

**DRAFT**

*Semi-annual Report  
April 2025 – September 2025*

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## **SECTION I. Committee Members and City Personnel.**

### **1.1 City of Burleson Capital Improvement Program Advisory Committee**

Melanie McAnally, Chairman	Place 6
Hope Baker	Place 1
Justin French	Place 2
Martin Scott	Place 3
James Wood	Place 4
Vacant	Place 5
Roxanne Ancy	Place 7
Mike Perdue	Place 8
Trent Baker	Place 9

### **1.2 City of Burleson Staff Facilitators**

Michelle McCullough, P.E., CFM, Deputy Director Development Services/City Engineer  
Tony Mcilwain, Director of Development Services  
Randall Morrison, Director of Capital Engineering  
Dylan Whitehead, Deputy Director Development Services/Building Official

## **SECTION II. Executive Summary**

The City of Burleson owns and operates public infrastructure comprised of pumping stations, storage facilities, water and sewer pipelines, and roadways that are improved and expanded to meet the current and future needs of our fast-growing city. Chapter 395 of the Texas Local Government Code requires the Capital Improvements Program Advisory Committee (CIPAC) to file semiannual reports with the political subdivision. The purpose of the semiannual report is to document the progress of the Impact Fee Capital Improvements Plan (IFCIP) and any perceived inequalities in implementing the IFCIP or imposing the impact fee.

Impact fee studies establish future infrastructure demands and serve as a guide for the 5-year Capital Improvement Plan (CIP), which includes projected projects to be initiated within a 5-year time frame. Not all projects on the 5-year CIP are eligible for impact fee funding. The 5-year CIP is reviewed and updated yearly. The City Council adopted the current 5-year CIP on October 20, 2025.

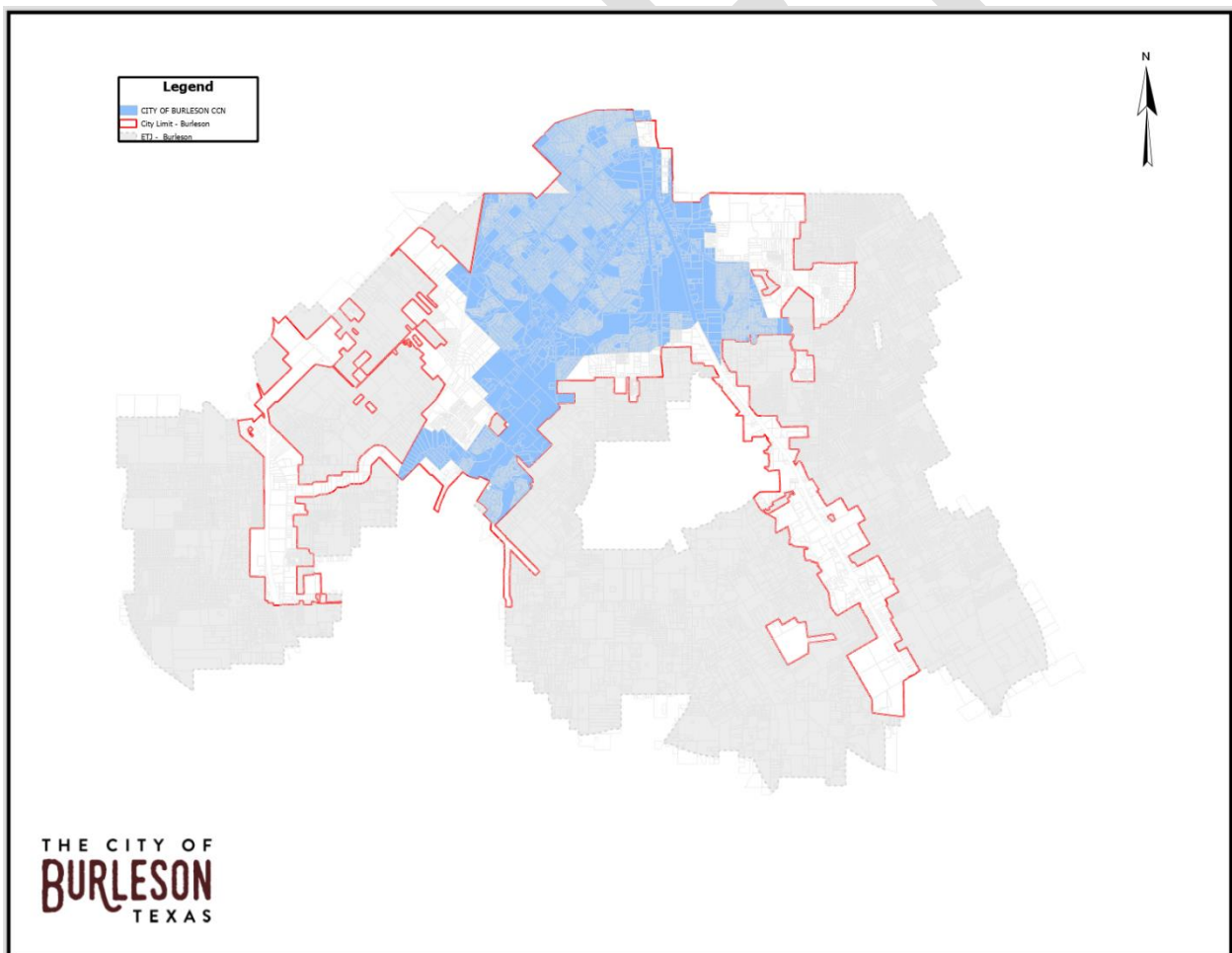
Water/wastewater and roadway impact fees were initially adopted in November 2005 and March 2017, respectively. The water/wastewater and roadway IFCIP was updated and new fee adopted by the City Council on December 11, 2023. The city's masterplan documents and impact fee studies can be found on the city's website at the following link - [Capital Improvements Program Advisory Committee | Burleson, TX - Official Website](#).

## Section III Water Impact Fees

### 3.1 Service Area

The city has the exclusive right to provide retail water within a Certificate of Convenience and Necessity (CCN). The CCN is a regulatory compliance certification that grants the city the exclusive right to provide retail water to a specific geographic area as defined by the Public Utility Commission (PUC). The city's geographic boundary of the water impact fee service area generally includes properties within the city limits, as depicted below in Figure 1. Other retail water providers hold a CCN within the Burleson city limits, including Bethesda Water Supply Corporation, Johnson County Special Water Utility District, and Bethany Special Utility District, which also provide retail water to customers within the city limits of Burleson.

**Figure 1**



### 3.2 Capital Improvements Plan

The updated IFCIP includes recommended improvements to the city's water system to provide the required capacity and reliability to meet the projected water demands through 2033. Table 1 represents the existing and proposed water system improvements; however, the updated impact fee analysis only includes the portion of the project's capacity that will be required to serve the projected growth.

**Table 1**  
**Cost Allocation for Water Impact Fee Eligible Capital Projects**

Project No.	Description of Project	Percent Utilization			Capital Cost	Current Development	10-Year 2023-2033	Beyond 2033
		2023	2033*	10-Year 2023-2033				
EXISTING								
A	24-Inch 1-35W Transmission Line (Industrial PS to Hidden Creek Parkway)	55%	90%	35%	\$3,759,961.00	\$2,067,979.00	\$1,315,986.00	\$375,996.00
B	12-inch Water Line Along FM 731 (SH 174 to CT 714)	60%	100%	40%	\$681,968.00	\$409,181.00	\$272,787.00	\$0.00
C	LPP Hulen Pump Station Expansion	60%	100%	40%	\$2,020,034.00	\$1,212,020.00	\$808,014.00	\$0.00
D	16-Inch Water Line along Hulen Street; 12-Inch Water Line along Hillside Dr	80%	100%	20%	\$2,742,887.00	\$2,194,310.00	\$548,577.00	\$0.00
E	12-inch Water Line Along Hidden Creek Pkwy (Dobson St to Hurst Blvd)	65%	90%	25%	\$1,285,980.00	\$835,887.00	\$321,495.00	\$128,598.00
F	16-Inch UPP Water Line Along FM 731 and Alsbury Blvd	75%	100%	25%	\$688,516.00	\$516,387.00	\$172,129.00	\$0.00
G	16-Inch LPP Water Line Along Alsbury Blvd (Hulen St to Flagstone Dr)	50%	90%	40%	\$3,860,170.00	\$1,930,085.00	\$1,544,068.00	\$386,017.00
H	Hidden Creek 1.0 MG Elevated Storage Tank	60%	90%	30%	\$2,541,459.00	\$1,524,875.00	\$762,438.00	\$254,146.00
I	12-Inch Water Line Along Silverthorne Dr	95%	100%	5%	\$209,620.00	\$199,139.00	\$10,481.00	\$0.00
J	Water Impacce Fee Study	0%	100%	100%	\$33,375.00	\$0.00	\$33,375.00	\$0.00
PROPOSED								
1	16-Inch County Road 920 Lower Pressure Plane Transmission Water Line	45%	80%	35%	\$3,058,800.00	\$1,376,460.00	\$1,070,580.00	\$611,760.00
2	16-Inch Wilshire Blvd Upper Pressure Plane Transmission Water Line	50%	75%	25%	\$1,826,900.00	\$913,450.00	\$456,725.00	\$456,725.00
3	12-Inch County Road 714 lower Pressure Plane Water Line	25%	75%	50%	\$3,022,900.00	\$755,725.00	\$1,511,750.00	\$755,725.00
4	12-Inch County Road 802 Upper Pressure Plane Water Line	0%	65%	65%	\$1,004,700.00	\$0.00	\$653,055.00	\$351,646.00
5	12-Inch FM 731 Lower Pressure Plane Water Line	0%	75%	75%	\$1,157,200.00	\$0.00	\$867,900.00	\$289,300.00
6	12-Inch 1-35 W Lower Pressure Plane Water Line	5%	65%	60%	\$2,972,100.00	\$148,605.00	\$1,783,260.00	\$1,040,235.00
7	12-Inch Wilshire Blvd Upper Pressure Plane Water Line	0%	50%	50%	\$1,288,700.00	\$0.00	\$644,350.00	\$644,350.00
8	8.5 MGD Industrial Pump Station Expansion and 1.0 MG Ground Storage Tank	50%	80%	30%	\$20,556,300.00	\$10,278,150.00	\$6,166,890.00	\$4,111,260.00
9	12/16-Inch Hyder Ranch Development Water Lines	0%	45%	45%	\$5,857,500.00	\$0.00	\$265,875.00	\$3,221,625.00
10	0.5 MG Hyder Ranch Elevated Storage Tank	0%	60%	60%	\$1,868,800.00	\$0.00	\$1,121,280.00	\$747,520.00
11	Fort Worth Offsite Water Supply Improvements	50%	75%	25%	\$5,501,000.00	\$2,750,500.00	\$1,375,250.00	\$1,375,250.00
12	8-Inch Village Creek Lower Pressure Plane Water Line	55%	90%	35%	\$633,900.00	\$348,645.00	\$221,865.00	\$63,390.00
13	12-Inch Shoreline Drive Upper Pressure Plane Water Line	0%	60%	60%	\$965,800.00	\$0.00	\$579,480.00	\$386,320.00
14	8-Inch County Road 715 Lower Pressure Plane Water Line	50%	70%	20%	\$457,500.00	\$228,750.00	\$91,500.00	\$137,250.00
Total Water Capital Improvements Cost					\$67,996,070	\$27,690,148	\$24,968,810	\$15,337,112

\*Utilization in 2023 on proposed projects indicates a portion of the project that will be used to address deficiencies within the existing system, and therefore are not eligible for impact fee cost recovery for future growth

Table 2 lists the projects included in the current and past adopted Capital Improvement Plans (CIP) and included in the impact fee study and eligible for funding through impact fees collected.

**Table 2**  
**Proposed Water Infrastructure Improvements**

Project #	LOCATION DESCRIPTION	SIZE	Status	Estimated Project Cost	Design	Construction
Proposed Water Facilities - Water Storage						
WA2301	Industrial Pump Station expansion and Alsbury Pump Station decommission - this project will add pumping capacity to support future growth	8.5 MGD	Award Pending Council Approval	\$ 27,862,801	100%	0%
WA2602	Hulen Pump Station Expansion - provides additional pumping capacity to meet the needs of expected growth	2.5MG	Pending	\$ 391,255.00	Pending	0%
TBD	Mountain Valley elevated storage tank to provide required storage capacity per TCEQ without exceptions	0.75 MG	Pending	\$ 3,675,000	Pending	Pending
Total Estimated Costs				\$ 31,929,056		
Proposed Water Facilities - Transmission Lines						
WA2503	Water line along CR 802 identified by the model to provide a water line loop for the area which will provide redundant water for the Mountain Valley development.	12"	Pending	\$ 1,483,061	Pending	Pending
WA2403	Water lines from Dobson Road to the Hidden Vista development will provide water looping for this area.	8"	Under Design	\$ 1,400,000	10%	0%
ST2306	Water line along Hulen St. to provide transmission capacity to the LPP from the Hulen Low Pump Station. This project is included in the Hulen St. widening project.	16"	Under Design	\$ 6,318,069	60%	0%
WA2306	Offsite Water Supply from Fort Worth. Fort Worth's consultant is currently design a transmission line down to Burleson that will provide additional water capacity to support future growth and Burleson water customers	24"	Under Design	\$ 16,331,504	60%	0%
Total Estimated Costs				\$ 25,532,634		

### 3.3 Revenue

Water impact fees are assessed based on the date the plat was filed and collected prior to the issuance of a building permit. For development that occurs without platting, the assessment and collection are made prior to the building permit. Table 3 summarizes the fees collected from April 1, 2025, to September 30, 2025, broken down by residential and commercial land use types.

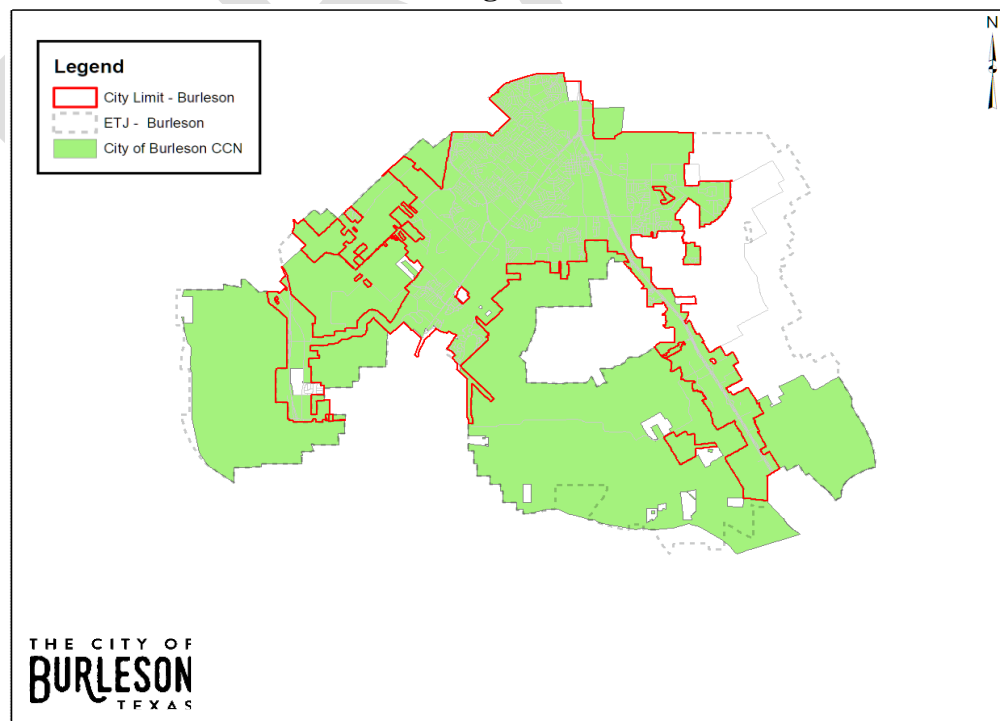
Table 3 Water Impact Fees			
Description	Residential	Commercial	Total
Impact Fee Earned	\$146,703.32	\$22,824.00	\$169,527.32
Offsets/Credits Earned	\$0.00	\$0.00	\$0.00
Net Amount Collected	\$146,703.32	\$22,824.00	\$169,527.32

## Section IV Wastewater Impact Fees

### 4.1 Service Area

Similar to the water CCN, the City has the exclusive right to provide retail wastewater within a Certificate of Convenience and Necessity (CCN). The City's geographic boundary of the wastewater impact fee service area generally includes properties within the city limits and the city's extraterritorial jurisdiction (ETJ), as depicted below in Figure 2. Johnson County Special Water Utility District is the only other retail wastewater provider at this time.

**Figure 2**





## 4.2 Capital Improvements Plan

The updated IFCIP also includes recommended improvements to the city's wastewater system to provide the required capacity and reliability to meet the projected water demands through 2033. Table 4 represents the existing and proposed wastewater system improvements; however, the updated impact fee analysis only includes the portion of the project's capacity that will be required to serve the projected growth.

**Table 4**  
**Cost Allocation for Wastewater Impact Fee Eligible Capital Projects**

Project No.	Description of Project	Percent Utilization			Capital Cost	Current Development	10-Year 2023-2033	Beyond 2033
		2023	2033*	10-Year 2023-2033				
EXISTING								
A	Village Creek Relief Line (135W to City Limits)	90%	100%	10%	\$1,522,849	\$1,370,564	\$152,285	\$0
B	North Creek Relief Life	75%	95%	20%	\$2,386,114	\$1,789,586	\$477,223	\$119,306
C	Town Creek Relief Line	65%	85%	20%	\$1,525,270	\$991,426	\$305,054	\$228,791
D	Shannon Creek Trunk Line	35%	75%	40%	\$1,329,850	\$465,448	\$531,940	\$332,463
E	Village Creek Relief Line (Town Creek to SH174)	65%	100%	35%	\$1,892,341	\$1,230,022	\$662,319	\$0
F	Quil Miller Trunk (Hurst Creek to Hidden Creek Parkway)	30%	65%	35%	\$1,641,508	\$492,452	\$574,528	\$574,528
G	Quil Miller Trunk (Hidden Creek Parkway to IH35W)	25%	65%	40%	\$2,327,148	\$581,787	\$662,319	\$814,502
H	Quil Miller Trunk (1-35W to Highpoint Business Park)	25%	65%	40%	\$742,377	\$185,594	\$574,528	\$259,832
I	Sewer Extension to Decomission Mockingbird FM and Lift Station	85%	100%	15%	\$2,194,471	\$1,865,301	\$329,171	\$0
J	CR 915 Sanitary Sewer Line Phase 1	20%	75%	55%	\$785,570	\$157,114	\$432,064	\$196,393
K	CR 915 Sanitary Sewer Line Phase 2	10%	55%	45%	\$1,170,915	\$117,092	\$526,912	\$526,912
L	Fort Worth Offsite Wastewater Capacity Improvements Line B	0%	60%	60%	\$8,895,789	\$0	\$5,337,473	\$3,558,316
M	Fort Worth Offsite Wastewater Capacity Improvements Line A	0%	45%	45%	\$5,374,120	\$0	\$2,418,354	\$2,955,766
N	Wastewater Impact Fee Study	0%	100%	100%	\$33,375	\$0	\$33,375	\$0
PROPOSED								
1	Town Creek Basin 42/48-inch Parallel Interceptor	25%	60%	35%	\$7,795,000	\$1,948,750	\$2,728,250	\$3,118,000
2	Town Creek Basin 1-35W 36-Inch Parallel Interceptor	20%	55%	35%	\$4,659,300	\$391,860	\$1,630,755	\$2,096,685
3	Village Creek Basin 30/36 -Inch Wastewater Replacement	15%	55%	40%	\$9,529,200	\$1,429,380	\$3,811,680	\$4,288,140
4	Village Creek Basin 12-Inch Wastewater Replacement	75%	95%	40%	\$1,022,600	\$766,950	\$409,040	-\$153,390
5	Town Creek Parkview Drive 10-Inch Wastewater Replacement	90%	100%	10%	\$829,800	\$746,820	\$82,980	\$0
6	Willow Creek Basin Wilshire Boulevard 24-Inch Parallel Interceptor	20%	65%	45%	\$7,071,400	\$1,414,280	\$3,182,130	\$2,474,990
7	Town Creek Basin East Hyder Ranch 18-Inch Wastewater Replacement	40%	80%	40%	\$3,191,900	\$1,276,760	\$1,276,760	\$638,380
8	Town Creek Basin East Hyder Ranch 15-Inch Collector Line	0%	60%	60%	\$1,528,700	\$0	\$917,220	\$611,480
9	Shannon Creek Basin West Hyder Ranch 12-Inch Collector Line	0%	60%	60%	\$1,372,500	\$0	\$823,500	\$549,000
10	Shannon Creek Basin SW Hulen Street 15-Inch Collector Line	0%	60%	60%	\$2,156,600	\$0	\$1,293,960	\$862,640
11	The Lakes 12-Inch Collector Line	0%	70%	70%	\$876,100	\$0	\$613,270	\$262,830
12	Burleson Westside Business Park Lift Station Force Main/ Collector	0%	70%	70%	\$8,013,200	\$0	\$5,609,240	\$2,403,960
13	Chisholm West Lift Station Force Main/Collector	0%	45%	45%	\$9,659,200	\$0	\$4,346,640	\$5,312,560
Total Wastewater Capital Improvements Cost					\$73,179,699	\$8,631,892	\$35,041,539	\$29,506,268

\*Utilization in 2023 on proposed projects indicates a portion of the project that will be used to address deficiencies within the existing system, and therefore are not eligible for impact fee cost recovery for future growth

Table 5 lists the projects included in the current and past adopted plans and included in the impact fee study and eligible for funding through impact fees collected.

**Table 5**  
**Proposed Wastewater Infrastructure Improvements**

Project #	LOCATION DESCRIPTION	SIZE	Status	Estimated Project Cost	Design	Construction
<b>Proposed Wastewater Facilities - Collection Lines</b>						
WW2301	Parallel wastewater interceptor in the central Town Creek basin identified in the model to relieve existing capacity-related issues. Once constructed, this parallel line should have the capacity for future development within the city. The existing sewer line remains impact fee eligible for funding any remaining debt.	36"- 48"	Under Design	\$31,064,230	60%	0%
WW2601	Wastewater line within golf course for future development	12"	Under Design	\$ 2,772,000	10%	0%
WW2502	Potential parallel or upsizing of sewer Interceptor within NW Parkview Dr to relieve model indicated capacity issue	10"	Under Design	\$ 1,100,000	0%	0%
TBD	Parallel wastewater interceptor from FM 731 to Village Creek to increase capacity for future development	24"	Under Design	\$ 6,800,000	60%	0%
WW2604	Chisholm West Lift Station and Pressure Main to serve the northwest portion of the city	6MGD	Pending	\$ 7,400,000	0%	0%
TBD	Hyder Ranch Masterplan Sewer to serve the proposed masterplanned community	Various Sized	Pending	\$ 7,927,500	0%	0%
TBD	Legacy Hill Sewer Extension	12"	Pending	\$ 651,000	0%	0%
<b>Total Estimated Costs</b>				<b>\$57,714,730</b>		

### 4.3 Revenue

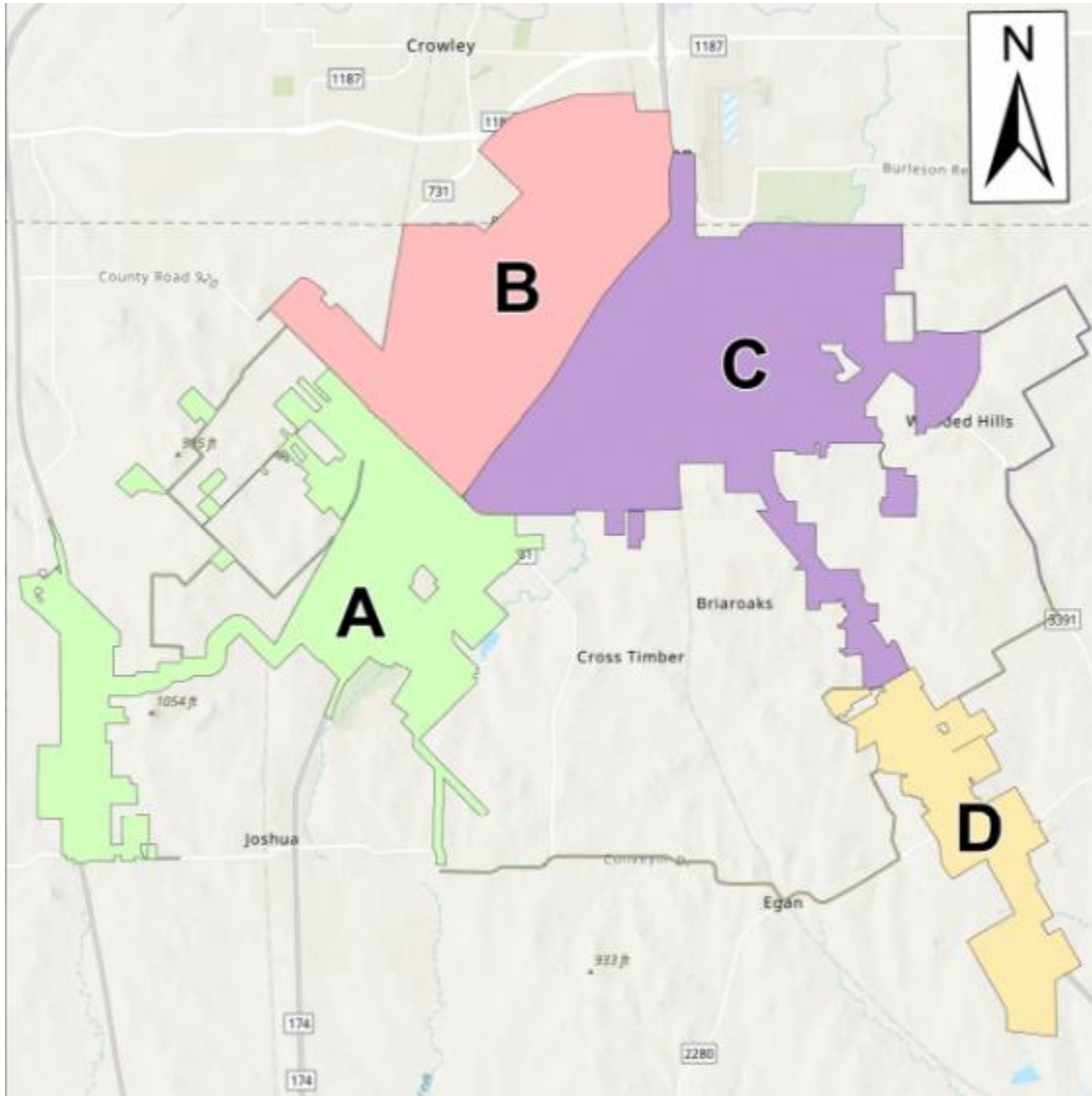
Wastewater impact fees are assessed based on the date the plat was filed and collected prior to the issuance of a building permit. For development that occurs without platting, the assessment and collection are made prior to the building permit. Table 6 summarizes the fees collected from April 1, 2025, to September 30, 2025, broken down by residential and commercial land use types.

<b>Table 6</b> <b>Wastewater Impact Fees</b>			
<b>Description</b>	<b>Residential</b>	<b>Commercial</b>	<b>Total</b>
Impact Fee Earned	\$109,753.97	\$11,505.00	\$121,258.97
Offsets/Credits Earned	\$0.00	\$0.00	\$0.00
<b>Net Amount Collected</b>	<b>\$109,753.97</b>	<b>\$11,505.00</b>	<b>\$121,258.97</b>

## Section V Roadway Impact Fees

### 5.1 Service Area

For roadway impact fees, the City is divided into four Service Areas. Roadway Impact fees can only be used on eligible projects within a given Service Area. Below is a graphical representation of the Service Areas within the City of Burleson.



## 5.2 Capital Improvements Plan

Recommended improvements to the city's roadway network were included in the updated IFCIP to support the required capacity and reliability to meet the projected traffic demands through 2033. Table 7 includes roadways within the current adopted CIP eligible for impact fee funding. Maps with corresponding IDs and a complete list of the roadways included in the adopted impact fee study are included in Exhibit B.

**Table 7**  
**Proposed Roadway Infrastructure Improvements**

					Project Limits				
City Project #/Private Development	Length of Project (mi)	% in Service Area	Roadway Classification	Project Name	From	To	Estimated Project Cost	Design	Construction
Proposed Roadway Improvements in Service Area A									
ST2202 (Alsbury Ph.2)	0.27	100%	MiA-120	Alsbury Blvd - this section included the extension of Alsbury from Hulen to CR 1020 providing better connectivity through the area and increasing emergency response times.	Hulen St	1,445' S. of Hulen St.	\$9,489,772	100%	5%
ST2301 (Alsbury Ph. 3)	1.78	50%	MiA-120	Co Rd 1020 - Also known as future Alsbury Blvd. This connection will support expected growth and provide better connectivity through the area as well as increase emergency response times.	Co Rd 914	360' E of Prairie Grove Ln	\$61,000,000	5%	0%
ST2306 (Hulen Intersection & Road Widening)	0.87	A - 50% B - 50%	PA-120	A portion of Hulen is currently under design to Candler Road. Four lanes will be designed with two to be constructed. Ultimately this roadway will need to be widened to six lanes.	Candler Dr	Wilshire Blvd	\$12,581,317	60%	0%
ST2501	2.18	100%	PA-120	Wilshire Blvd - schematic, environmental	Wicker Hill	City limit line to the south	\$1,250,000	0%	0%
ST2602	2.18	100%	PA-120	Wilshire Blvd - construction documents	Wicker Hill	City limit line to the south	\$1,600,000	0%	0%
TBD	0.51	100%	MaC-70	Wicker Hill and Greenridge Reconstruction	Wilshire Blvd	2,685 N of Wilshire Blvd	\$6,900,000	0%	0%
Total Estimated Costs for Service Area A							\$84,338,089		
Proposed Roadway Improvements in Service Area B									
ST2302 (Alsbury Phase 1B)	0.69	100%	MiA-90	Alsbury Blvd - this section included the extension of Alsbury to Hulen providing better connectivity through the area and increasing emergency response times.	Hulen St	Candler Dr	\$4,532,000	100%	95%
ST2306 (Hulen Intersection & Road Widening)	0.87	A - 50% B - 50%	PA-120	A portion of Hulen is currently under design to Candler Road. Four lanes will be designed with two to be constructed. Ultimately this roadway will need to be widened to six lanes.	Candler Dr	Wilshire Blvd	\$12,581,317	60%	0%
Total Estimated Costs for Service Area B							\$17,130,317		
Proposed Roadway Improvements in Service Area C									
ST2309 (Village Creek Pkwy Ext.)	0.43	50%	MaC-70	Village Creek Pkwy (initially Stone Road) will improve the existing 2 lane county type roadway from Mcall to Alsbury Blvd. The overall plan is for Village Creek Pkwy to be constructed to FM1187 in the future by the City of Fort Worth	Alsbury Blvd	McCall St	\$9,304,634	90%	0%
Total Estimated Costs for Service Area C							\$9,304,634		
Total Estimated Costs							\$110,773,039		

### 5.3 Revenue

Roadway impact fees are based on the plat approval date and collected prior to issuance of a building permit. For development that occurs without platting, the assessment and collection is made prior to the building permit. Table 8 summarizes the fees collected from October 1, 2024 to March 31, 2025, broken down by residential and commercial land use types.

<b>Table 8</b>			
<b>Roadway Impact Fees</b>			
<b>Description</b>	<b>Residential</b>	<b>Commercial</b>	<b>Total</b>
Area A	\$41,999.58	\$0.00	\$41,999.58
Area B	\$13,240.73	\$63,606.68	\$76,847.41
Area C	\$165,118.80	\$64,341.69	\$229,460.49
Area D	\$0.00	\$0.00	\$0.00
<b>Net Amount Collected</b>	<b>\$220,359.11</b>	<b>\$127,948.37</b>	<b>\$348,307.48</b>

### 5.4 Roadway Impact Fee Credits

The City's Roadway Impact Fee ordinance allows credits to impact fees due when a developer constructs a system facility. A system facility means a roadway improvement or expansion designated in the City's Roadway Impact Fee Capital Improvements Plan. The City Council has approved credits for roadway impact fees for three developments to date, as listed in Table 9. Staff is not aware of any credits that have been approved for water or wastewater credits.

<b>Table 9</b>			
<b>Roadway Impact Fees Credits</b>			
<b>Development</b>	<b>System Facility</b>	<b>Impact Fee Credit</b>	<b>Remaining Credit</b>
Waverly Apartments	Fairfield Parkway	\$238,235.52	\$0.00
Shannon Creek Apartments/Reverie Single Family	Candler Drive	\$1,105,083.66	\$0.00
PF Farms Single Family	Lakewood Drive / Greenridge Drive	\$1,814,336.68	\$1,228,342.54
<b>Net Credits Remaining</b>			<b>\$1,228,342.54</b>

## Section VI                      Summary of Impact Fees

A summary of the impact fees collected from FY 2019 through FY 2025 is provided in Table 10.

<b>Table 10 Summary of Impact Fees FY2019 - FY2025</b>			
<b>Year</b>	<b>Water</b>	<b>Wastewater</b>	<b>Roadway</b>
FY2019	\$957,044.23	\$339,707.31	\$666,010.53
FY2020	\$988,157.79	\$459,834.75	\$922,711.36
FY2021	\$847,867.74	\$418,289.24	\$811,395.34
FY2022	\$1,054,627.79	\$605,083.73	\$618,573.42
FY2023	\$877,994.19	\$611,587.34	\$687,482.70
FY2024	\$652,340.27	\$442,349.27	\$759,078.10
FY2025	\$403,179.32	\$260,546.96	\$759,645.18
<b>Totals</b>	<b>\$5,781,211.33</b>	<b>\$3,137,398.60</b>	<b>\$5,260,896.63</b>

## Section VII                      Findings

The Impact Fee Capital Improvements Program Advisory Committee makes the following conclusions:

1. The City continues to make progress in the implementation of the capital program.
2. Construction costs continue to remain high increasing overall construction costs.
3. The adopted water, wastewater, and roadway CIP continue to be an appropriate representation of the upgrades and expansions needed to the City's system facilities in order to accommodate predicted future growth and address existing system deficiencies.
4. Collection of impact fees reduces the debt required to construct new water, wastewater, and transportation infrastructure to serve new development.
5. The administration of the program has been fair and equitable.
6. No perceived inequities are noted in implementing the capital program.