City of Camas

Park Impact Fee Study

July 2024

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Section I. INTRODUCTION

The City of Camas (City) is seeking to update its parks impact fee (PIF) to provide partial funding for the capital needs of its parks system. In 2022, the City engaged FCS GROUP to calculate a PIF update based on recent growth estimates, its parks project lists, and parks inventory data. The City provides parks and recreation services for all in its boundaries, and the City's park planning efforts extend throughout the same boundaries. The City's PIF is currently \$5,853 per dwelling unit.

The following sections provide the policy background upon which the PIF is based, as well as a general overview of the PIF calculation. The rest of the report details the specific data inputs and results of the PIF calculation.

I.A. POLICY

Park impact fees are enabled by state statutes, authorized by local ordinance, and constrained by the United States Constitution.

I.A.1. State Statutes

Impact fees are authorized by state law in RCW 82.02.050 through 82.02.110. By law, revenue from park impact fees shall be used for park system improvements that will reasonably benefit new development. The money may not be used to address system deficiencies, or maintenance and repair costs. The fees cannot exceed new development's proportionate share of the improvement costs, and the revenue may be spent only for the public facilities which are addressed by the capital facilities plan element of an adopted comprehensive land use plan. Impact fee revenue must be spent within ten years after collection. In addition, the City cannot depend entirely on impact fees to fund capital costs; there must be some amount of funding from other local sources.

I.A.2. Local Ordinance

The City of Camas is authorized to charge impact fees under Chapter 3.88 of its municipal code. The City is implementing code updates to support the PIF calculated in this report, as well as to comply with updates to the State Statutes.

I.A.3. United States Constitution

The United States Supreme Court has determined that impact fees and other exactions that comply with state and/or local law may still violate the United States Constitution if they are not proportionate to the impact of the development. The PIF calculated in this report is designed to meet such constitutional and statutory requirements.



I.B. CALCULATION OVERVIEW

In general, impact fees are calculated by adding an existing facilities fee component and a future facilities fee component—both with potential adjustments. Each component is calculated by dividing the eligible cost by growth in units of demand. The unit of demand becomes the basis of the charge. The diagram below summarizes the basic outline of an impact fee calculation, and more detail is provided in the following bullets.



- The eligible cost of capacity in existing facilities is the cost of existing park facilities that will serve growth. For a parks impact fee, determining the capacity in the existing system available for growth starts with determining the amount of existing parks facilities that are required for existing users, commonly measured in park acres. One method for doing so first calculates the system's level-of-service after completion of the capital facilities plan. By applying that level-of-service target to the current population, the City can determine if it's currently meeting its level-of-service target. If the City has more park facilities (such as park acres) than needed based on its level-of-service target, the costs of such available facilities can be included in the existing facilities component of the impact fee.
- The eligible portion of capacity increasing projects is the cost of future projects that will serve growth. Some projects are intended to only serve growth, some projects do not serve to increase the capacity of the City's park system, and some serve the City's current and future populations. Determining how projects fall into each category can again be done with a level-of-service calculation to estimate how many park acres (for example) are needed to serve growth given the City's level-of-service target. Other projects that do not add a measurable number of parks facilities may still be eligible if they will serve both existing and future users.
- **The growth in system demand** is the anticipated growth in the City's population. However, as residents are not the only users of the City's park system, employees of businesses within will be included as well, at a separate rate that reflects the parks demand characteristics of commercial developments.

Finally, summing the existing facilities component with the future facilities component gives the fully calculated impact fee.



Section II. PIF ANALYSIS

This section provides the detailed calculations of the maximum allowable PIF for the City of Camas.

II.A. GROWTH

The calculation of projected growth begins with defining the units by which current and future demand will be measured. Then, using the best available data, we quantify the current level of demand and estimate a future level of demand. The difference between the current level and the future level is the growth in demand that will serve as the denominator in the PIF calculations.

II.A.1. Unit of Measurement

A good unit of measurement allows an agency to quantify the incremental demand of development or redevelopment that creates additional demand for park facilities. A better unit of measurement allows an agency to distinguish different levels of demand added by different kinds of development or redevelopment.

II.A.1.a Options

For parks impact fees, demand that can be attributed to individual developments is usually measured in the number of people who will occupy a development. For residential developments, the number of occupants means the number of residents. We use data from the U. S. Census Bureau to estimate the number of residents for different kinds of dwelling units. For non-residential developments, the number of occupants means the number of employees. We use industry data to estimate the number employees per square foot for different kinds of non-residential developments.

When an agency chooses to impose a PIF on both residential and non-residential developments, the demand of one additional resident must be carefully distinguished from the demand of one additional employee. This is usually accomplished by the calculation of a residential equivalent. One resident is equal to one residential equivalent, and one employee is typically less than one residential equivalent.

Non-residential developments are a source of demand for parks facilities in Camas, and the City intends to charge PIFs for both residential and non-residential developments using residential equivalents as the unit of growth.

II.A.2. Demand Adjustment for Non-Residential Users

To charge PIFs to both residential and non-residential developments, we must estimate both (1) how much availability non-residential occupants (i.e., employees) have to use parks facilities and (2) how that availability differs from residential occupants (i.e., residents).

The calculation begins with the most recent counts for population and employment in Camas. As shown in **Exhibit 2.1** below, in 2019 (the most recent year for which both population and employment data were available), 25,602 residents lived in Camas, according to the Census Bureau's



American Community Survey. Also, according to the Census Bureau, 9,052 employees worked in Camas for their primary occupation. Of these, 1,425 people both lived and worked in Camas.

Population and Employment, 2019	Living Inside	Living Outside	
	Camas	Camas	Total
Working Inside Camas	1,425	7,627	9,052
Working Outside Camas	8,628		
Not Working	15,549		
Total	25,602		

Exhibit 2.1 – 2019 Population and Employment in Camas

Source: Census Bureau, OnTheMap, 2019 Inflow/Outflow Analysis on Primary Jobs

Next, we estimate the number of hours per week that each category of person would be available to use the parks facilities in Camas. **Exhibit 2.2** below shows an estimate of maximum availability. It assumes that 8 hours each day are used for sleeping for all residents of the City. For those who are not working, the remaining 16 hours of each day are available for use of the parks system, giving a total of 112 hours per week of parks system availability. For workers, 8 hours of each day are assumed to be spent at work, which leaves the remaining 8 hours per weekday available for residential use of the parks system. In addition, workers have 16 hours of residential demand each weekend day, for a total of 72 hours per week of residential demand. During work, 1 hour is assumed to be available for workers to use the parks system, giving 5 hours per week of non-residential demand. These estimates are not of actual use, but maximum availability.

Exhibit 2.2 – Demand Estimates by Category of Parks User

Hours per Week of Park Availability	Living Inside
Per Person, Residential Demand	Camas
Working Inside Camas	72
Working Outside Camas	72
Not Working	112
Sources FCS CDOUD	

Source: FCS GROUP.

Hours per Week of Park Availability		
Per Person, Non-Residential	Living Inside	Living Outside
Demand	Camas	Camas
Working Inside Camas	5	5
Working Outside Camas		
Not Working		

Source: FCS GROUP.

When the hours of availability above are multiplied by the counts presented earlier, we can determine the relative demand of residents and employees. As shown in **Exhibit 2.3** below, the parks demand of one employee is equivalent to the parks demand of about 0.05 residents. To put it another way, the parks demand of about 19.26 employees is equivalent to the parks demand of one resident.



Total Hours per Week of Park	Re	sidential	Non-residentia	
Availability, 2019		hours	hours	Total Hours
Working Inside Camas	· ·	102,600	45,260	147,860
Working Outside Camas	6	621,216		621,216
Not Working	1,7	741,515		1,741,515
To	al 2,4	165,331	45,260	2,510,591
Hours per resident		96		
Hours per employee			5	
Residents per employee				0.05

Exhibit 2.3 – Total Hours per Week of Park Availability

Source: Previous tables

II.A.3. Growth in Demand

The current (2020) demand for parks facilities is 26,544 residential equivalents. That number is the sum of 26,065 residents and 479 residential equivalents for 9,216 employees. Population estimates come from the 2022 Parks, Recreation, and Open Space (PROS) Plan, and employee counts come from the Census Bureau estimates for 2019 increased proportionally with the population.

During the forecast period from 2020 to 2035, the residential population is expected to grow by 8,035 residents. If total residential equivalents remain proportionate to the residential population, then residential equivalents will grow by 8,183 to a total of 34,726 residential equivalents. Therefore, 8,183 residential equivalents will be the denominator for the PIF calculations later in this report.

Exhibit 2.4 below summarizes these calculations:

Residential Equivalent Growth,					
Camas	2020	2035	Growth	CAGR	Growth Share
Population	26,065	34,100	8,035	1.81%	23.56%
Employees	9,216	12,056	2,841	1.81%	23.56%
Residential-equivalent employees	479	626	148	1.81%	23.56%
Total residential equivalents	26,544	34,726	8,183	1.81%	23.56%

Exhibit 2.4 – Growth in Demand

Source: 2022 PROS Plan

II.B. FUTURE FACILITIES FEE

The future facilities fee is the eligible cost of planned projects per unit of growth that such projects will serve. Since we have already calculated growth (denominator) above, we will focus here on the future facilities fee cost basis (numerator).

II.B.1. Eligibility

A project's eligible cost is the product of its total cost and its eligibility percentage. The eligibility percentage represents the portion of the project that creates capacity for future users.

For park impact fees, eligibility is often determined by a level-of-service analysis that quantifies the park facilities that are needed for growth (and are therefore eligible to be included in the future



facilities cost basis). Park facilities can be measured by sorting them into categories such as neighborhood park, community park, or open space, or by considering their respective units of measurement (e.g., acres) without distinguishing them by park type. Further, in either approach, the current or future level of service may be targeted. These two separate choices create four distinct and equally defensible ways of calculating the eligibility percentage of each project.

Each method will be examined in the sections below.

II.B.1.a Current Level of Service (By Category and by Unit of Measurement)

Determining PIF eligibility for parks projects using the current level of service requires determining the quantity of parks facilities needed to maintain the current level of service. Any projects that add facilities in excess of that quantity are ineligible.

The City has seven relevant parks categories for determining its level of service by category. These are shown in the upper panel of the first column in **Exhibit 2.5**. Each category receives its own level of service. Using neighborhood parks as an example, the City currently has 36.03 acres of neighborhood parks. Using the 2020 population discussed above, this implies that there are 1.38 acres of neighborhood parks per 1,000 residents. The parks project list, when completed, will add 28.18 acres of neighborhood parks. Based on the 2035 population and the current level of service, only 11.11 additional acres of neighborhood parks are needed. So, only 11.11 acres out of the planned 28.18 acres are eligible for inclusion in the parks impact fee, or 39.41 percent.

The same line of reasoning is used to develop the eligibility percentages for other parks categories. Calculating eligibility using level of service by unit of measurement (e.g., acres, miles), instead of by park type, also follows the same approach. The eligibility percentage for each parks category or unit of measurement is shown in the last column of **Exhibit 2.5**.

					Curren	t LoS
			2020 11=1=====	Ohanaa in	Additional	
	Linita	2020 Questitu	2020 Units per		Needed to	Elizibility
Du Ostanasu	Units	2020 Quantity	1,000 Residents	Quantity	Maintain Los	Eligibility
By Category:						
Neighborhood Park	Acres	36.03	1.38	28.18	11.11	39.41%
Community Park	Acres	59.74	2.29	-	18.42	0.00%
Regional Park	Acres	54.80	2.10	5.00	16.89	100.00%
Cemetery	Acres	25.40	0.97	-	7.83	0.00%
Greenspace	Acres	839.68	32.21	(25.53)	258.85	0.00%
Special Facility	Number	6.00	0.23	2.00	1.85	92.48%
Trail	Miles	12.00	0.46	20.30	3.70	18.22%
By Unit of Measurement:						
Acres of Parks and Natural Areas	Acres	1,015.64	38.97	7.65	313.09	100.00%
Number of Special Facilities	Number	6.00	0.23	2.00	1.85	92.48%
Miles of Trail	Miles	12.00	0.46	20.30	3.70	18.22%

Exhibit 2.5 – Eligibility under the Current Level of Service

Source: City of Camas, previous tables



II.B.1.b Future Level of Service (By Category and Unit of Measurement)

To determine PIF eligibility using the future level of service, the proposed additional quantity of planned parks facilities is added to the current quantity of parks facilities. Using the future population, a future level of service is then calculated. That level of service is compared to the current parks system to determine if any deficiencies exist against the current population. Only the portions of parks projects that do not cure existing deficiencies are considered eligible for the future facilities fee cost basis under this method.

As in the previous section, calculating PIF eligibility based on future level of service can be done both when measuring parks facilities by category and when measuring by unit of measurement. **Exhibit 2.6** below outlines both methods using the future level of service. Using neighborhood parks as an example again, the City currently has 36.03 acres of neighborhood parks. The parks project list, when completed, will add 28.18 acres of neighborhood parks. This results in a future level of service of 1.88 acres of neighborhood parks per 1,000 residents in 2035. If that level of service was applied to the 2020 population, a minimum of 49.08 acres would be needed. However, the City only has 36.03 acres in 2020, so 13.05 of the acres being constructed would be curing the current deficiency in the system and would not be eligible for inclusion in the PIF cost basis. Therefore, only the remaining 15.13 acres added by the project list are eligible for inclusion in the PIF, or 53.69 percent.

The same approach is used to develop the eligibility percentages for other parks categories. Calculating eligibility using level of service by unit of measurement (e.g., acres, miles), instead of by park type, follows the same logic. The eligibility percentage for each parks category or unit of measurement is shown in the "Eligibility" column of **Exhibit 2.6** below.

						Future	LoS	
	Units	2020 Quantity	2020 Units per 1,000 Residents	Change in Quantity	2035 Units per 1,000 Residents	2020 Minimum Quantity	Eligibility	Reimbursable Quantity
By Category:								
Neighborhood Park	Acres	36.03	1.38	28.18	1.88	49.08	53.69%	-
Community Park	Acres	59.74	2.29	-	1.75	45.66	0.00%	14.08
Regional Park	Acres	54.80	2.10	5.00	1.75	45.71	100.00%	9.09
Cemetery	Acres	25.40	0.97	-	0.74	19.41	0.00%	5.99
Greenspace	Acres	839.68	32.21	(25.53)	23.88	622.31	0.00%	217.37
Special Facility	Number	6.00	0.23	2.00	0.23	6.11	94.25%	-
Trail	Miles	12.00	0.46	20.30	0.95	24.69	37.49%	-
By Unit of Measurement:								
Acres of Parks and Natural Areas	Acres	1,015.64	38.97	7.65	30.01	782.18	100.00%	233.47
Number of Special Facilities	Number	6.00	0.23	2.00	0.23	6.11	94.25%	-
Miles of Trail	Miles	12.00	0.46	20.30	0.95	24.69	37.49%	-

Source: City of Camas, previous tables

The final column of **Exhibit 2.6** shows the reimbursable quantity of each park category and unit of measurement. The quantity of such park facilities exceeds the existing needs of the park system when measuring by the future level of service, and as such, can be used to provide capacity for future users. Since those facilities will benefit future users, a share of their cost can be included in the existing facilities cost basis.



II.B.2. Expansion Projects

The first of the City's two project lists includes projects that will expand the inventory of the parks system and are therefore subject to the eligibility calculations described above. The total cost of these projects is \$50.95 million, and eligibility is based on the level-of-service calculation chosen. These projects are summarized in **Exhibit 2.7** below. The eligibility percentages and the eligible cost columns are shown assuming the future level-of-service calculation by unit of measurement. As shown, the total eligible cost is \$44.33 million.

Project Name	Total Cost	Eligibility	Eligible Cost
Trail Corridors	\$ 2,500,000	37.49%	\$ 937,299
T-3 Trail - East segment of N. Shore Trail	1,250,000	37.49%	468,649
Mill Ditch Trail	3,500,000	37.49%	1,312,218
Green Mountain property	1,500,000	37.49%	562,379
Neighborhood park	4,500,000	100.00%	4,500,000
Neighborhood park	4,000,000	100.00%	4,000,000
Ash Creek Park	2,200,000	100.00%	2,200,000
Neighborhood park	3,500,000	100.00%	3,500,000
Lacamas Heights Park	1,000,000	100.00%	1,000,000
Ostensen Canyon Park	3,000,000	100.00%	3,000,000
Legacy Lands - Phase I, implementation site master plan	4,000,000	100.00%	4,000,000
Aquatic Center *	19,000,000	94.25%	17,907,918
Public Plaza	1,000,000	94.25%	942,522
Total	\$ 50,950,000	-	\$ 44,330,985

Exhibit 2.7 – Expansion Project	ets
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Source: 2022 PROS Plan

II.B.3. Infill List

The second of the City's two project lists includes projects that will not expand the inventory of the parks system by adding acres but that will nevertheless add capacity for future users by adding amenities. The project list is shown in **Appendix A** and has a total cost of \$56.22 million. Each project is assigned one of two eligibility percentages: zero percent if the project is for repair or replacement of existing assets and 23.56 percent if the project adds new amenities. That 23.56 percent represents the share of total future users made up by new users at the end of the planning period in 2035. Assigning a project that eligibility percentage recognizes that existing and future users are expected to share new amenities in existing parks proportionately. The total eligible cost of the infill list is approximately \$13.02 million.

II.B.4. Calculated Future Facilities Fee Cost Basis

After determining costs associated with expanding capacity, the future facilities fee cost basis is calculated by multiplying those costs by their respective eligibility percentages. As discussed above, eligibility for capacity-expanding costs on the project list were determined through level-of-service calculations, and projects on the infill list were assigned either 0 or 23.56 percent. All methods are equally valid, meaning that the future facilities cost basis ranges from \$44.29 million up to \$57.35 million depending on the level of service method chosen, as shown in **Exhibit 2.8** below.



Future Facilities Cost Basis			Currei	nt Lo	S	Fut	ure	LoS	
	Cost	Eli	gibility		Eligible Cost	Eligibili	ty		Eligible Cost
By Category									
Neighborhood Park	\$ 18,200,000	39	.41%	\$	7,172,720	53.69	% \$	\$	9,771,083
Community Park	-	(.00%		-	0.00	%		-
Regional Park	4,000,000	100	.00%		4,000,000	100.00	%		4,000,000
Cemetery	-	(.00%		-	0.00	%		-
Greenspace	-	(.00%		-	0.00	%		-
Special Facility	20,000,000	92	.48%		18,496,068	94.25	%		18,850,440
Trail	8,750,000	18	8.22%		1,594,489	37.49	%		3,280,545
Expansion Projects Total	\$ 50,950,000			\$	31,263,276		9	\$	35,902,068
Infill Projects	56,215,000				13,022,120				13,022,120
Total	\$ 107,165,000			\$	44,285,395		\$	\$	48,924,188
By Unit of Measurement									
Acres of Parks and Natural Areas	\$ 22,200,000	100	.00%	\$	22,200,000	100.00	% \$	\$	22,200,000
Number of Special Facilities	20,000,000	92	2.48%		18,496,068	94.25	%		18,850,440
Miles of Trail	8,750,000	18	3.22%		1,594,489	37.49	%		3,280,545
Expansion Projects Total	\$ 50,950,000			\$	42,290,556		S	\$	44,330,985
Infill Projects	56,215,000				13,022,120				13,022,120
Total	\$ 107,165,000			\$	55,312,676		5	\$	57,353,105

Exhibit 2.8 – Future Facilities Cost Basis

Source: Previous tables

II.C. EXISTING FACILITIES FEE

The existing facilities fee is related to the eligible cost of the park facilities available for future users. Growth was calculated in Section II.A and **Exhibit 2.6** shows the quantity of facilities available for inclusion in the existing facilities fee. The remaining component of the fee calculation is the original cost of eligible park facilities.

II.C.1. Existing Facilities Fee Cost Basis

The City provided records for historical expenditures on its parks system going back as far as 1951. These costs were divided into categories and unit of measurement as shown in the third column of **Exhibit 2.9**. By dividing that investment by the total number of units in each category, the historical investment per unit was calculated as shown in the fifth column of **Exhibit 2.9**.



					Historical
		Historical	Number of	In	vestment per
	Units	Investment	Units		Unit
By Category:					
Neighborhood Park	Acres	\$ 3,720,679	36.03	\$	103,272
Community Park	Acres	2,498,285	59.74		41,819
Regional Park	Acres	6,578,811	54.80		120,051
Cemetery	Acres	-	25.40		-
Greenspace	Acres	31,871,085	839.68		37,956
Special Facility	Number	5,008,302	6.00		834,717
Trail	Miles	2,417,414	12.00		201,451
Total		\$ 52,094,576			
By Unit of Measurement:					
Acres of Parks and Natural Areas	Acres	\$ 44,668,861	1015.64	\$	43,981
Number of Special Facilities	Number	5,008,302	6.00		834,717
Miles of Trail	Miles	2,417,414	12.00		201,451
Total		\$ 52,094,576			

Exhibit 2.9 – Historical Investment in the City's Parks System

Source: City staff, previous tables

By multiplying that investment per unit by the number of units shown in **Exhibit 2.6**, the eligible cost of those park facilities is calculated to be approximately \$9.93 million when measuring by category and approximately \$10.27 million when measuring by unit of measurement. However, an adjustment must be made for growth's share of outstanding debt related to that investment. Such an adjustment is necessary to make sure that growth isn't paying twice for the same capacity; once in the PIF, and once through property taxes. Growth's share of outstanding principal is estimated to be \$2.84 million, and so the total eligible amount is either \$7.29 million or \$7.62 million depending on the method used for determining level of service.

	Units	Eligible Number of Units	Eli	Unadjusted igible Amount	Outstanding Principal	Growth's Share of Outstanding Principal	Total Eligible Amount
By Category:							
Neighborhood Park	Acres	-	\$	-	\$ -	\$ -	\$ -
Community Park	Acres	14.08		588,672	-	-	588,672
Regional Park	Acres	9.09		1,091,351	-	-	1,091,351
Cemetery	Acres	5.99		-	-	-	-
Greenspace	Acres	217.37		8,250,521	11,224,000	2,644,717	5,605,804
Special Facility	Number	-		-	840,000	197,930	-
Trail	Miles	-		-	-	-	-
Total			\$	9,930,544	\$ 12,064,000	\$ 2,842,646	\$ 7,285,827
By Unit of Measurement:							
Acres of Parks and Natural Areas	Acres	233.47	\$	10,268,171	\$ 11,224,000	\$ 2,644,717	\$ 7,623,455
Number of Special Facilities	Number	-		-	840,000	197,930	-
Miles of Trail	Miles	-		-	-	-	-
Total			\$	10,268,171	\$ 12,064,000	\$ 2,842,646	\$ 7,623,455

Exhibit 2.10 – Existing Facilities Fee Cost Basis

Source: City staff, previous tables



II.D. CALCULATED PIF

This section combines the eligible cost from the future facilities cost basis and the existing facilities cost basis. It also makes an adjustment for the estimated future facilities fee balance. This fund balance was collected based on the City's previous PIF methodology. To avoid the risk of double-charging for projects that were carried over from the previous list to the list used in this calculation, the outstanding fund balance is removed.

After adjusting for the fund balance, the PIF is calculated by dividing the total cost basis for each level of service calculation by the growth in residential equivalents, producing a parks impact fee per residential equivalent. **Exhibit 2.11** below summarizes the PIF calculation for all four measures of level of service.

Calculated Parks Impact Fee	Current by	Future by			
	Category	Category	(Current by Unit	Future by Unit
Cost Basis:					
Future Facilities	\$ 44,285,395	\$ 48,924,188	\$	55,312,676	\$ 57,353,105
Estimated Future Facilities Fee Balance	(3,851,009)	(3,851,009)		(3,851,009)	(3,851,009)
Existing Facilities	-	7,285,827		-	7,623,455
Total Cost Basis	\$ 40,434,386	\$ 52,359,006	\$	51,461,667	\$ 61,125,550
Growth in Residential Equivalents	8,183	8,183		8,183	8,183
Future Facilities Fee per Residential Equivalent	\$ 4,942	\$ 5,508	\$	6,289	\$ 6,539
Existing Facilities Fee per Residential Equivalent	-	890		-	932
Total Parks Impact Fee per Residential Equivalent	\$ 4,942	\$ 6,399	\$	6,289	\$ 7,470
Impact Fee per Dwelling Unit	\$ 13,739	\$ 17,791	\$	17,486	\$ 20,770
Impact Fee per Employee	257	332		327	388

Exhibit 2.11 – Calculated PIF

Source: Previous tables, Census Bureau ACS 2020 5-year Estimates for Camas, Table B25024 and B25033

As shown above, the maximum allowable PIF is \$7,470 per residential equivalent under the future level of service by unit of measurement. The resulting PIF is \$20,770 for a residential dwelling unit, based on an average occupancy of 2.78 residents per Census data.

The rate per employee is \$388 based on the equivalency calculated in **Section II.A**. The nonresidential PIF can be charged using an estimate of employee density per 1,000 square feet. **Exhibit 2.12** below provides a schedule for the non-residential PIF for all four level-of-service calculations based on employee density estimates from the Portland Metro regional government and the U.S. Census Bureau Area Profile provided in its 2021.



	Employees	Current by	Future by	Current by	Future by
	per 1,000 SF	Category	Category	Unit	Unit
Industrial	1.17	\$300	\$389	\$382	\$454
Retail	2.13	\$546	\$707	\$695	\$825
Office	2.16	\$555	\$719	\$706	\$839
Healthcare	2.86	\$733	\$949	\$933	\$1,108
Overall	1.77	\$454	\$588	\$578	\$687

Exhibit 2.12 – Calculated Non-residential PIF

Source: Metro, "1999 Employment Density Study," Table 4. US Census Bureau Area Profile (2021) OnTheMap - All Employees



Section III. IMPLEMENTATION

This section addresses practical aspects of implementing PIFs and provides comparisons to other jurisdictions.

III.A. INDEXING

We recommend that the City index its charges to the Engineering News Record Construction Cost Index for the City of Seattle and adjust its charges annually.

III.B. SCALING THE RESIDENTIAL PIF

New Washington State law requires a scaling impact fee schedule for PIFs charged to residential dwelling units. This is discussed in RCW 82.02.060(1), which states that the schedule for PIFs "shall reflect the proportionate impact of new housing units... based on the square footage, number of bedrooms, or trips generated." Per the same code section, this scaling requirement is intended "to produce a proportionally lower impact fee for smaller housing units." This requirement is not just for single-family dwelling units, but also for multi-family dwelling units.

One approach for scaling the PIF is to estimate the smallest dwelling unit size (inclusive of singlefamily and multi-family dwelling units) necessary to accommodate one resident in Camas, and thereby calculate the PIF per dwelling unit as a per square foot charge. The Census Bureau's statistics from the American Community Survey state that the average occupancy per dwelling unit in Camas in 2020 was 2.78. Per Clark County Assessor's data, the City's estimated average dwelling unit size (inclusive of both single-family and multi-family dwelling units) is 2,277 square feet. That means that, on average, 819 square feet accommodates one resident, and 1 square foot will accommodate 0.0012 residents.

American Housing Survey data for the Portland Metro Area shows that, to a point, house size is positively correlated with the number of occupants. After about 2,605 square feet, that correlation dissipates. Therefore, we recommend that the City scale its parks impact fee for residential developments up to a maximum of 2,605 square feet. Doing so would set a minimum PIF of \$7,470 for dwelling units at 819 square feet or less, and a maximum PIF of \$23,770 at 2,605 square feet or more. Each intermediate square foot would increase the PIF by \$9.12. This approach is summarized in **Exhibit 3.1** below.

Exhibit 3.1 –	Scaled	Residential	PIF	Calculation
Exhibit 3.1 –	Scaled	Residential	PIF	Calculation

Parks Impact Fee Schedule	Square Feet	Residents	Impact Fee
Impact fee per resident	819	1.0000	\$7,470
Impact fee per square foot of dwelling unit	1	0.0012	\$9.12
Maximum impact fee per dwelling unit	2,605	3.1819	\$23,770

Source: Census Bureau ACS 2020 5-year Estimates for Camas, 2019 American Housing Survey for Portland, City staff



The City can use the summary provided in Exhibit 3.1 to generate a PIF schedule to be applied to both single-family and multi-family residential units based on their total square footage (SF). Exhibit **3.2** provides an example of such a schedule where housing units are sorted into different SF ranges, with each range being assigned a SF for the purpose of calculating the PIF.

	Calculated
Example Scaled PIF Schedule	PIF
0 to 1,000 SF	\$7,470
1,001 to 2,000 SF	\$13,685
2,001 to 2,600 SF	\$20,770
2,601 SF and above	\$23,766
Source: Provious tables	

Exhibit 3.2 – Scaled Residential PIF Schedule

Source: Previous tables

In addition to requirements for scaling laid out in RCW 82.02.060(1), state law also puts restrictions on the impact fees that can be charged to accessory dwelling units (ADUs). Per RCW 36.70A.681(a), the ciry may not assess impact fees on ADUs that are greater than 50 percent of the charge assessed to the principal dwelling unit. Therefore, if the City implements a scaling schedule as laid out in Exhibit 3.2, the City should also ensure that its code limits the charge for an ADU to 50 percent of the charge assessed to the principal dwelling unit. For example, if the principal dwelling unit is 1,500 SF, the charge for an ADU added to that property should be no more than 50 percent multiplied by \$13,685, or \$6,482.

COMPARISONS

Exhibit 3.3 below shows a comparison of PIFs calculated for single-family residences for some relevant jurisdictions.

Jurisdiction	PIF for a SFR*
Camas** (Maximum)	\$20,770
Issaquah	\$10,805
Kirkland	\$8,016
Sammamish	\$6,739
Washougal	\$6,663
Redmond	\$6,373
Camas (Current)	\$5,853
Shoreline	\$5,410
Vancouver	\$5,232
Woodland	\$4,580
Battleground	\$4,419
Ridgefield	\$4,181
La Center	\$2,842

Exhibit 3.3 – PIF Comparisons for Single-family Residences

Source: FCS GROUP Survey, 3/28/2024

*SFR = Single-family residence

**Assumes 2,000 to 2,499 SF



Exhibit 3.4 below shows a comparison of PIFs calculated for multi-family homes for some relevant jurisdictions.

Jurisdiction	PIF per Dw	elling Unit
Camas** (Maximum)	\$13,685	
Issaquah	\$6,633	
Kirkland***	\$6,093	
Camas (Current)	\$5,853	
Washougal***	\$4,829	
Woodland	\$4,580	
Sammamish	\$4,362	
Ridgefield	\$4,181	
Redmond	\$4,085	
Vancouver	\$3,824	
Battleground	\$3,670	
Shoreline	\$3,548	
La Center***	\$2,842	

Exhibit 3.4 – PIF Comparisons for Multi-family Dwelling Units

Source: FCS GROUP Survey, 3/28/2024 **Assumes 1,001 to 2,000 SF

***Kirkland has an ADU rate of \$3,224 Washougal has an ADU rate of \$2,332 La Center has an ADU rate of \$710

Exhibit 3.5 below shows a comparison of PIFs calculated for 1,000 square feet of office space. As shown, many jurisdictions do not charge a non-residential PIF.

Exhibit 3.5– PIF Comparisons for 1,000 Square Feet of Office Space

Jurisdiction	PIF for 1,000 SI	F Office Space
Redmond	\$1,726	
Issaquah	\$1,150	
Camas (Maximum)	\$504	
Camas (Current)	\$0	
Kirkland	\$0	
Sammamish	\$0	
Shoreline	\$0	
Vancouver	\$0	
Ridgefield	\$0	
La Center	\$0	
Battleground	\$0	
Woodland	\$0	
Washougal	\$0	

Source: FCS GROUP Survey, 3/28/2024



			lπ	ipact Fee	Impact Fee-
Project Name	Details	Total	Cost	Eligibility	Eligible Costs
Crown Park	Park development per site master plan	\$ 6,300	000	23.56% \$	1,484,472
Open Space Management Plan	Develop Plan			23.56%	
Urban Forestry Management Plan	Develop Plan			23.56%	
System -wide	Trails & Trailheads - planning and development	1,800	000	23.56%	424,135
Skate Park				23.56%	•
Closing the Loop - Heritage and N. Shore trails	Planning and development	1,500	000	23.56%	353,446
Mill Ditch Trail	Trail corridor access point & stairway planning	225	000	23.56%	53,017
System-wide	Minor repair/replacement (parks amenities) projects	250	000'	0.00%	,
Forest Home Park	Picnic shetter, drainage, building replacement & minor upgrades	300	000'	23.56%	70,689
3rd Ave. Trailhead	Trailhead development			23.56%	
Legacy Lands - Phase I, develop site master plan	Using existing draft Vision Plan, phased approach to Master Planning. This would be Phase I.			23.56%	'
Skate Park (Phase 2)	Phase II - Water access, trail and parking improvements	2,000	000'	23.56%	471,261
Bike pump track	Install bike pump track at selected site	350	000	23.56%	82,471
Dog Park	Install dog park at selected site	125	000	23.56%	29,454
All-inclusive playground	Install all-inclusive playground at selected site	600	000	23.56%	141,378
System-wide (ADA Compliance projects)	ADA compliance projects: facilities, pathway & amenities	200	000'	23.56%	47,126
System -wide (assessment of existing fields)	Sports Field - assessment of existing fields & planning for system gaps	100	000	23.56%	23,563
Fallen Leaf Softball Field	Field improvements, new fence, infield dirt/grading, etc.	200	000'	23.56%	47,126
Green Mountain property Site master plan	Site master plan	250	000	23.56%	58,908
System -wide	Wayfinding and Park Signage program	150	000	23.56%	35,345
Hentage Park	Modify dock, staging to separate non-motorized launches and Gate access control upgrades	125	000	23.56%	29,454
System-wide (wayfinding and signage)	Playground replacements	1,000	000	23.56%	235,630
Dorothy Fox Park	Sport field drainage/renovations	150	000	0.00%	•
Grass Valley Park	Sport field drainage/renovations	150	000	0.00%	•
Heritage Park	Picnic shetter installation & minor upgrades	280	000	23.56%	65,977
Prune Hill Sports Park	Sport field drainage/renovations	150	000	0.00%	•
Heritage Park	Install additional parking	250	000	23.56%	58,908
Prune Hill Sports Park	Picnic shetter installation & minor upgrades	200	000	23.56%	47,126
Sports Complex	Site selection, site master plan, implementation	20,000	000	23.56%	4,712,610
Ash Creek Park	Site master plan	06	000'(23.56%	21,207
Goot Park	Picnic shetter installation, replace bleachers & minor upgrades	150	000	23.56%	35,345
Louis Block Park	Upgrade baseball facilities (fencing, restroom, concession, etc.)	150	000	23.56%	176,723
Ostensen Canyon Park	Site master plan	100	000	23.56%	23,563
Leadbetter House redevelopment	Feasibility analysis and redevelopment	2,000	000	23.56%	471,261
Community garden support	New garden to fill gap in the system	20	000	23.56%	11,782
Lacamas Heights Park	Site master plan	75	000	23.56%	17,672
Oak Park	Restroom installation & minor site upgrades	400	000	23.56%	94,252
Camas Community Center *	Feasibility analysis and redevelopment	10,000	000	23.56%	2,356,305
Heritage Park	Upgrade playground & restroom	450	000	23.56%	106,034
Grass Valley Park	Replace playground	250	000	0.00%	
Fallen Leaf Lake Park	Park development per site master plan	2,600	000	23.56%	612,639
Goot Park - area under powerline	Site master plan and development	1,750	000	23.56%	412,353
Pickelball Courts	Master Planning and development (upto 8 courts)	895	000	23.56%	210,889
		\$ 56,215	000	s	13,022,120

APPENDIX A: INFILL PROJECT LIST

♦ FCS GROUP