



December 15, 2025

City of Star Mayor and Council
City of Star
10769 W State St.
Star, ID 83669

Re: Request for Additional Time to Review Proposed Impact Fee Updates

Mayor and Members of the City Council,

I want to begin by stating clearly that we support the use of development impact fees and understand the very real challenges that fast-growing communities like Star face. We recognize the importance of funding public safety, particularly police services, as well as parks and recreational amenities that contribute to quality of life. Growth should help pay for growth, and impact fees can be an appropriate tool when they are proportionate, well-calculated, and aligned with adopted levels of service.

Our request is not to abandon this effort, but to slow it down and ensure it is done correctly.

Time for Meaningful Stakeholder Review

The proposed timeline, receipt of a final draft on Wednesday with adoption the following Tuesday, does not provide sufficient time for affected stakeholders to meaningfully review the assumptions, calculations, and policy implications of the study.

Impact fees have long-term consequences for housing affordability, project feasibility, and the pace of development. Stakeholders who will ultimately be responsible for funding these improvements deserve adequate time to review the material, ask questions, and provide informed feedback before the City takes final action.

Allowing additional time would not derail the City's goals but would instead improve confidence in the final outcome.

Growth and Demographic Assumptions Raise Questions

Several of the growth and demographic assumptions used in the study merit further discussion:

- The study assumes a level of residential growth that appears higher than assumptions used in other City planning and fee programs, raising questions about internal consistency.
- Declining household size and increased density are used to justify higher per-capita demand for public facilities, while current land-use policies trend toward larger lots, increased setbacks, larger homes, and reduced density.
- Assumptions about future housing unit size and form appear very similar to existing conditions, suggesting the justification of higher per-capita demand for public facilities may be flawed.

These are not minor inputs, they directly drive fee levels. Additional time would allow these assumptions to be reconciled and stress-tested.



Cost Inputs Need Greater Transparency

The proposed impact fees are heavily influenced by cost assumptions that are not fully explained in the materials provided, particularly:

- Land acquisition costs, which are applied broadly without supporting appraisals, market data, or differentiation between fee-simple land, easements, floodplain property, or constrained parcels.
- The study acknowledges that much of Star's existing parkland was acquired through donations, developer agreements, and grants, yet assumes no future contributions of this type and assigns the full cost of future land acquisition to impact fees.

From a development perspective, these assumptions appear conservative at best and potentially overstated. Greater transparency and discussion around these inputs would be beneficial.

Level of Service Calculations Deserve Closer Review

Impact fees are intended to maintain existing levels of service, not to increase service levels or correct existing shortfalls.

Several aspects of the study raise questions for builders and developers, including:

- Level of Service benchmarks that appear to be newly established rather than previously adopted.
- Inclusion of facilities not owned or maintained by the City in current LOS calculations.
- Capital projects and amenities that feel like service enhancements rather than simple maintenance of existing standards.

The study itself acknowledges that portions of certain projects are not impact-fee eligible, which reinforces the need for careful review of how LOS is being defined and applied.

Credit and Offset Mechanisms Are Unclear

Developers support impact fees when there is clarity and fairness, particularly when development is already delivering public improvements.

The current materials reference a future credit process, but from a builder's perspective:

- Credits appear discretionary rather than automatic.
- There is no clear policy for pursuit of credits.
- This creates uncertainty and the perception of potential double-payment.

Incorporating a clear, adopted credit framework as part of any updated fee program would go a long way toward improving acceptance and predictability.

Inconsistencies and Gaps Undermine Confidence

Finally, there appear to be inconsistencies and gaps throughout the report, including:

- Conflicting statements about current parkland levels of service.



- Differences in police staffing ratios between sections.
- Limited citation or documentation for key assumptions and cost inputs.

These issues may be resolvable, but they reinforce the need for additional time and discussion before adoption.

In light of the above, we respectfully request that the City:

1. Delay adoption of the proposed impact fee increases
2. Allow time for additional stakeholder review and feedback
3. Clarify growth assumptions, cost inputs, LOS calculations, and credit mechanisms
4. Consider independent review or supplemental analysis where appropriate

Taking this additional time will help ensure the final impact fee program is fair, proportionate, transparent, and workable, one that builders can support and the City can rely on as it continues to grow.

Thank you for your consideration and for your continued service to the City of Star. We appreciate the opportunity to engage constructively and look forward to continued dialogue.

Respectfully,

A handwritten signature in blue ink, appearing to read "Adam Capell", is positioned above the printed name.

Adam Capell
EVP, Land & Development
Tresidio Homes