

ATTN:  
Johanna Blanco,  
Planning Department, Moab City

**Applicant: Amasa Apartments**  
Subject: Impact Fee Waiver Narrative

Amasa Apartments, is an affordable housing development located at 57 Kane Creek Boulevard in Moab, Utah, designed to directly address the City’s shortage of deeply affordable rental housing. The project delivers 50 affordable rental units with long-term affordability restrictions and is structured to serve households earning well below the Area Median Income (AMI) for Grand County.

For Phases 1 of the project, units are restricted at a range of affordability levels, specifically 25%, 39%, 45%, and 50% AMI, with unit sizes ranging from two to four-bedroom apartments suitable for families. When weighted and averaged across all restricted units, the project achieves an average AMI of approximately 43.4%. Based on this calculation, all 50 units qualify within the City’s 30%–59% AMI affordability category, and of those, five qualify for the band below that, consistent with the City’s impact fee waiver framework and affordability goals.

**Unit Mix & AMIs**

2 beds					
25% AMI	39% AMI	45% AMI	50% AMI	TOTAL	
	5	1	20	1	27

3 beds					
25% AMI	39% AMI	45% AMI	50% AMI	TOTAL	
	0	3	7	1	11

4 beds					
25% AMI	39% AMI	45% AMI	50% AMI	TOTAL	
	0	1	3	8	12

Average AMI
43.4%

Affordability is legally ensured through a recorded Land Use Restrictive Agreement (LURA) executed pursuant to the project's Low-Income Housing Tax Credit (LIHTC) awards. The applicable LURA will be executed and recorded upon closing of the project's financing for the relevant phases. The LURA will run with the land and require that the units be rented to income-qualified households at restricted rents for 50-years. The Development Agreement between the City of Moab and Amasa Holdings LLC incorporates these requirements and expressly conditions development approvals on compliance with all recorded LURAs.

The project will be subdivided into a townhome plat consistent with the approved development agreement. Adjustments to building identification numbers and legal descriptions may occur at the time of townhome plat recording as necessary, without reducing the total number of designated affordable units or altering the project's average AMI classification for purposes of this waiver request.

The project meets the eligibility criteria of the City's Affordable Housing Partnership Policy and Impact Fee Assistance Program in that:

1. It is located within the incorporated boundaries of Moab,
2. 100% of the units for which impact fee relief is requested are deed-restricted affordable housing units
3. The units materially advance the affordability goals of MMC Chapter 17.69 by serving households significantly below Grand County's median income, and
4. Affordability is guaranteed through recorded instruments rather than voluntary or time-limited commitments.

## **Requests**

The Building Department has calculated impact fees of \$246,648.81. Given the project's modest scale, existing infrastructure, improvements already made when Kane Creek Blvd was under construction (including stubbing out water and storm drain, and long-term affordability restrictions), these fees create a significant feasibility gap. Any reduction that brings total impact fees closer to \$0 or allows the project to defer payment of said fees until it is stabilized is essential for the project to pencil and move forward.

If a full waiver is not possible, we respectfully request that the impact fee waiver calculation not be based on an averaged AMI across all units. There is no language in the adopted code for averaging AMIs for waiver purposes and this approach appears only within the matrix and may result in a reduced waiver that does not reflect the project's unit-by-unit affordability. At a minimum, the matrix should be adjusted to reflect the AMI bracket of each individual unit, and we ask that whichever methodology yields the higher waiver should be applied.

This is an infill project located on a site with existing residential units and established infrastructure, which substantially reduces the need for new public facility capacity compared to larger or greenfield developments. Despite this, the project has already absorbed significant onsite infrastructure costs, including upgrading the existing water meter and installing a stubbed stormwater connection. Furthermore, due to the absence of City sewer infrastructure serving the site, the development is required to retain the existing sewer lift station and construct a new lift station with a backup generator, along with additional piping to the north, per the City's request, to support a potential future City sewer connection across Kane Creek Boulevard. Collectively, these privately funded sewer infrastructure improvements represent at least \$200,000 in additional project costs that would not be required if City sewer service were extended to the property.

Granting meaningful impact fee relief is critical to delivering and maintaining our goal of deeply affordable housing for low- and moderate-income households in Moab while supporting infrastructure improvements that benefit the broader community.