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Development Services  
[mesaaz.gov](http://mesaaz.gov)

February 4, 2019

Jeff Welker  
Welker Development Resources, LLC  
3125 E. Dover Street  
Mesa, Arizona 85213

Dear Mr. Welker,

As an official of the City of Mesa (the "City") charged with the administration of Development Impact Fees, I have reviewed your client's permit, PMT18-07818 (the "Permit"), for the new development located at 8855 East Main Street. The proposed development is classified as a storage facility, and according to the plans submitted, there is 46,320 square feet of mini-storage and 98,628 square feet of covered commercial Recreational Vehicle (RV) parking or storage. You are disputing the inclusion of the square footage of the covered RV storage in the City's calculation of the nonresidential fire and public safety impact fees. I have evaluated the Permit and the impact fees being assessed and I have determined the nonresidential fire and public safety impact fees being assessed are correct and the square footage for the covered RV parking was properly included in the calculation of the impact fees.

As further discussed below, there are a number of reasons the City includes the square footage of commercial covered RV parking (also referred to as storage) in its calculation of impact fees for a nonresidential development including: 1) it represents the proportionate share of the cost of providing the necessary fire and public safety services; 2) RV parking, particularly covered RV parking, imposes an additional burden on Mesa's Fire and Public Safety; and 3) the City has historically included the square footage of a structure or canopy that is considered an extension of the commercial activity on the property.

RV parking compared to traditional vehicle or employee parking, poses a higher risk of fire because RV's have an exponentially greater amount of combustible materials, even compared to other large vehicles. Adding a cover or canopy over an RV parking space greatly increases the chance of a single RV fire spreading and impacting other RV's because the canopy restricts fire, heat and smoke from traveling vertically which causes the heat and smoke to spread horizontally. The canopy also limits the fire department's ability to use an elevated master stream or ladder truck to apply heavy amounts of water to the fire from above, making it more challenging to fight the fire. In addition, radiant heat exposure is always a concern and challenge. For these reasons, a fire occurring in a covered RV storage facility, especially of the size being proposed, poses a higher risk than traditional vehicle or employee covered parking.

The inclusion of the square footage of covered commercial parking in calculating impact fees is not new to Mesa. The City has historically included this square footage in its impact fee calculations if: a) the business charges a fee for the public to park (e.g. monthly fee to store a vehicle), not simply a fee for employees to park; or b) the covered structure is a part of, or an extension of, the commercial activity on the property (e.g. car wash covered vacuum areas) as opposed to parking for customer or employee parking. In fact, in reviewing the permits issued by the City, this has been our practice since 2004. You should not be surprised by the City's assessment. According to my research, in 2004, you were the City employee who supervised how to apply impact fees to projects.

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The City is not unique in assessing impact fees for covered commercial parking. I compared Mesa's fees to other cities in Arizona, including Phoenix, Tucson, and Gilbert, and all three municipalities include the square footage of covered commercial parking in their impact fee calculations, similar to Mesa. In reviewing your client's development, the covered RV parking area is a part of and an extension of the commercial activity on the property.

For the reasons outlined in this letter, the impact fees assessed with the Permit, which includes the square footage of the covered parking, is correct. If you disagree with my determination, you may appeal it pursuant to Mesa City Code 5-17-10(I).

Sincerely,

A handwritten signature in black ink, appearing to read "Chase Carlile". The signature is fluid and cursive, written in a professional style.

Chase Carlile  
Sr. Fiscal Analyst  
Development Services Department