

DATE: 7 April 2026
TO: Drew Balsick, Flying Horse Foundation
FROM: Jack Ladley, Road Impact Fee Administrator
SUBJECT: Administrative Determination – Road Impact Fee Calculation for Flying Horse Foundation Equestrian Center

Background

An appeal was submitted regarding the Road Impact Fee (RIF) applied to the Flying Horse Foundation Equestrian Center. The original fee was calculated using the Golf Course/Agritainment land use category at 40 acres, resulting in a fee of approximately \$50,570.

The applicant has provided documentation indicating that the platted site area is 20.18 acres, not 40 acres. The applicant also proposed alternative methodologies based on trip generation and cost-per-trip calculations.

The Road Impact Fee Advisory Committee considered the applicant's appeal at its regularly scheduled meeting on March 26, 2026. Following discussion, the Committee voted 6-1 to recommend that the Road Impact Fee be reduced to cover the improved surfaces, associated with the site development plan which would include buildings, parking lots, landscaping and all other improved surfaces identified in the approved Site Development Plan. The Committee further recommended that pasture and other undeveloped areas be excluded from the fee calculation, with a condition that any future development or change in use of those areas shall require additional review and fee determination.

JACK LADLEY, EXECUTIVE DIRECTOR

DEPARTMENT OF PUBLIC WORKS

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Standard of Review

Section I of the Road Impact Fee Implementation Document provides in relevant part, “Any person or entity that believes that the provisions of the Road Impact Fee Program have been erroneously interpreted or applied must...” raise the issue with the Program Manager and, if no resolution is reached, have the issue heard by the Advisory Committee for a recommendation. The Road Impact Fee Administrator shall consider the recommendation and issue a decision on the appeal, which decision is final.

Issue

The issue is twofold:

1. Whether the original acreage used in the fee calculation was accurate; and
2. Whether an alternative methodology or adjustment is warranted to more accurately reflect the transportation impact of the proposed equestrian center.

Analysis

1. Acreage Correction

Based on the Final Plat, the site area is 40.008 acres as no areas were excluded from use. However, based on the updated information provided to the Road Impact Fee Advisory Committee, there was a way to exclude some acres from the Golf Course/Agritainment use as noted in their recommendation. The DPW Engineering Review team, recalculated the area of use to be 18.04 acres.

Applying the adopted Golf Course/Agritainment rate of \$1,264 per acre results in a corrected fee of:

$$18.04 \text{ acres} \times \$1,264/\text{acre} = \$22,802.56^1$$

2. Applicability of Alternative Methodologies

¹ Road Impact Fee Implementation Document, 2025, Fee Schedule – Outdoor Recreation

The applicant proposed recalculating the fee using cost-per-trip values, adjusted trip rates, and trip length assumptions.

However, the Road Impact Fee Program is based on a standardized, plan-based methodology, in which trip generation rates, trip length factors, calibration factors, and cost per trip are incorporated into the adopted fee schedule. The average cost per trip is established as part of the adopted program and is not intended to be modified outside of the independent fee study process.²

The Implementation Document further provides that, where a land use is not clearly defined, the Road Impact Fee Administrator shall determine the fee based on the most nearly comparable land use, using standardized references such as ITE trip generation data.³

As such, the adopted fee schedule reflects pre-established, system-wide assumptions, and the program does not provide a mechanism for adjusting individual variables such as trip generation rates or trip lengths on a case-by-case basis outside of an approved independent fee study.

Accordingly, the proposed hybrid calculations are not consistent with the adopted methodology and cannot be used as the basis for determining the fee.

3. Comparable Land Use and Appropriate Application

The equestrian center does not fit neatly within an existing land use category. The Golf Course/Agritainment (Outdoor Recreation) category remains the most comparable adopted category, as it applies to outdoor recreational uses not otherwise defined.⁴

The Implementation Document provides that fees for Outdoor Recreation uses are typically assessed based on the acreage of the entire parcel. However, where only a portion of the parcel has been identified for the use on an approved Site Development Plan, and the use is restricted from the remainder of the parcel, fees may be assessed on only that portion.⁵

² Road Impact Fee Implementation Document, 2025, Section B.4.e and Appendix 6

³ Road Impact Fee Implementation Document, 2025, Section B.4.d

⁴ Road Impact Fee Implementation Document, 2025, Definitions – Outdoor Recreation

⁵ Road Impact Fee Implementation Document, 2025, Section B.4.b

In this case:

- The Site Development Plan identifies specific areas of the property devoted to the equestrian use, including arenas, corrals, barns, parking, access drives, and associated improvements; and
- Other portions of the property consist of pasture or open land that are not identified as part of the active use area.

Applying the fee to the entire parcel would therefore overstate the transportation impact of the development, whereas applying the fee to the portion of the parcel identified for the use more accurately reflects the impact consistent with the structure of the program.

Determination

Based on the above, the following determination is made:

1. The original fee calculation based on 40 acres was correct based on information provided at the time, but the additional information submitted suggests that the acreage could be revised.
2. The Golf Course/Agritainment (Outdoor Recreation) category remains the most comparable land use for this development.
3. The Road Impact Fee shall be calculated based on the developed activity area of the site, including buildings, arenas, parking areas, internal circulations, etc. that generate trips.
4. Undeveloped acreage (e.g., pasture, open riding areas) shall be excluded from the fee calculations, provided such areas remain undeveloped. Any reduction in the Road Impact Fee is contingent upon the appellant formally revising the site development plan to accurately reflect the proposed change in use. Any future development or change in use of those areas shall require additional review, approval and fee determination.
5. For the purpose of this determination, the acreage used to determine the fee will be 18.04.

6. Applying the adopted rate of \$1,264 per acre results in a Road Impact Fee of \$22,802,56⁶.

Basis for Determination

This determination is supported by:

- The authority of the Road Impact Fee Administrator as the ultimate interpreter of the meaning and application of the Road Impact Fee Program.⁷
- The requirement to apply the most comparable land use category when a use is not clearly defined.⁸
- The structure of the program as a standardized, plan-based methodology, including the established cost per trip.⁹
- The allowance to assess Outdoor Recreation use based on a portion of a parcel when clearly identified and restricted through the Site Development Plan.¹⁰

Conclusion

This determination applies the adopted fee methodology in a manner that more accurately reflects the transportation impact of the proposed equestrian center, while maintaining consistency with the Road Impact Fee Program.

This approach maintains consistency with the adopted fee structure while ensuring the fee remains proportionate to the actual impact of the development.


Jack Ladley

Executive Director, Department of Public Works
Road Impact Fee Administrator

⁶ Road Impact Fee Implementation Document, 2025, Fee Schedule – Outdoor Recreation

⁷ Road Impact Fee Implementation Document, 2025, Section I – Appeals

⁸ Road Impact Fee Implementation Document, 2025, Section B.4.d

⁹ Road Impact Fee Implementation Document, 2025, Section B.4.e and Appendix 6

¹⁰ Road Impact Fee Implementation Document, 2025, Section B.4.b

cc: Road Impact Fee Program Manager
Road Impact Fee Advisory Committee