

City of Naperville

Entitlement Fee Study

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Chicago, Illinois

1. Introduction

The City of Naperville (the “City”) engaged Houseal Lavigne Associates, LLC (“Houseal Lavigne”) to review the City’s existing fee schedule used to assess application fees related annexation, development, zoning, and subdivision projects (“entitlement fees”). Staff from the City’s Transportation, Engineering and Development Business Group (“TED” or the “department”) have indicated that it is concerned that its traditional way of assessing fees (e.g., acreage-based fee calculations) do not necessarily correlate with a project’s complexity and that certain costs are not entirely recovered under the current fee schedule.

Report structure

This report documents the analytical methods and data sources, presents analytical results regarding current levels of cost recovery achieved from entitlement fees, and provides a high-level comparative survey of fees for a chosen set of regional municipalities. The report is divided into four primary sections, including:

- **Section 1** outlines the structure of the report, provides a background and understanding of the assignment, summarizes Houseal Lavigne’s methodological approach, and provides notes on data sources;
- **Section 2** summarizes a cost-recovery analysis utilizing actual fee and level-of-effort data provided by City staff for nine sample projects;
- **Section 3** presents our proposed revisions to the City’s existing entitlement fee schedule and structure;
- **Section 4** compares the City’s existing fee schedule to the results of a regional fee survey; and
- An **Appendix** contains back-up documentation and detailed analyses.

It is our understanding that the City’s staff report will include an updated version of the applicable section of the municipal code that incorporates recommendations contained within this report as well as the review and input provided by the Planning and Zoning Commission (PZC) and City Council (CC).

Background and understanding

City staff outlined several concerns with its existing entitlement fee schedule—including the process of collecting these fees—in its request-for-proposals (RFP) document. These concerns include the following:

- The current fee structure can be confusing, resulting in a significant number of incorrect fee submittals.
- Many fees are acreage-based, which is not always a representative indicator of a project’s complexity.
- Many of the fees do not necessarily correlate with the complexity of the submittal type (e.g., \$2,500 for a simple subdivision plat).
- Currently, commercial engineering fees are based on the number of parking stalls, excepting a fee for projects that do not require on-site parking (e.g., some downtown projects).

- Residential engineering fees are not collected until the plat is recorded, excepting a fee for those projects that are never submitted for recording.
- The City does not currently charge a resubmittal fee, resulting in a fixed fee collected for projects with multiple resubmittals.
- The City does not currently collect fees for temporary uses, agreements, site permits, site inspections, field changes, and record drawings, among others.
- Public-hearing notice fees are not aligned with actual costs incurred by the City.

Key study objectives

In light of the issues identified in the City's RFP, the primary goals of the study include the following:

- **Simplified fee structure.** Establish a streamlined fee structure that is reflective of a project's complexity and is easy for applicants to understand.
- **Competitive fees.** Establish fees that allow the City to remain regionally competitive while offsetting the City's expenses to provide development-review services.
- **Direct costs.** Collect reimbursement from applicants for direct costs that are currently paid by the City (e.g., public hearing notices and recording fees).
- **New fees.** Consider establishing new fee types, including a resubmittal fee for projects with excessive resubmittals, a fee for "add-on items" (e.g., development and annexation agreements), and fees for requests which are currently completed at no cost to the applicant (e.g., temporary uses, site permits, field changes, and record drawing review).

Approach and methodology

The City does not currently have policy prescribing that the department should be operated such that all relevant costs are recovered from user fees. Per direction from TED staff, Houseal Lavigne has developed recommendations for changes to the City's existing development-review fee schedule by preparing a cost-recovery analysis using fee and direct-labor and indirect-cost allocation data for nine representative projects, including four commercial projects, four residential projects, and one mixed-use projects. Finally, Houseal Lavigne's recommended fee-schedule amendments are compared to current fees, as well as comparable fees in municipalities throughout the region.

Data sources

Houseal Lavigne utilized the following data sources to support its cost-recovery analysis and fee-establishment components of the study:

- **Budget information.** The City of Naperville's *2019 Annual Operating Budget and Capital Improvement Program*.

- **Personnel data.**¹ A complete listing of all TED personnel by job title and percentage of time spent on development review.
- **Actual level-of-effort and fee data.** Actual fees collected and review hours expended staff for nine selected development-review projects (see **Table 1.1** on the following page).
- **Fee schedule.** Existing fee schedules as provided for by the City's municipal code.

¹ Per City staff, these activities include plan routing and processing, plan review, surety, site permits and inspections, pre-construction meetings, regular DRT meetings, counter discussions, planner-on-duty, PZC meetings, CC meetings, and meetings with applicants.

Table 1.1: Actual fees and hours for example projects

	C-1	C-2	C-3	C-4	MU-1	R-1	R-2	R-3	R-4	Total
<u>Planning fees</u>										
Annexation	-	-	-	-	-	660	-	-	2,900	3,560
Conditional use	-	-	-	-	290	290	-	-	-	580
Easement	-	230	-	-	-	-	-	-	-	230
Publication	80	80	80	80	80	160	80	80	240	960
PUD	5,000	-	-	5,000	-	-	-	-	-	10,000
Re-zoning	-	290	-	290	-	-	290	-	400	1,270
Soil erosion	325	-	-	-	-	-	-	-	-	325
Subdivision	-	-	-	-	230	230	2,500	2,500	12,007	17,467
Vacation	-	-	-	-	-	230	-	230	460	920
Variance	-	325	325	325	975	-	-	-	-	1,950
Subtotal: Planning fees	5,405	925	405	5,695	1,575	1,570	2,870	2,810	16,007	37,262
<u>Engineering fees</u>										
Engineering	2,116	702	380	506	4,041	14,614	2,003	9,436	46,781	80,579
Subtotal: Engineering fees	2,116	702	380	506	4,041	14,614	2,003	9,436	46,781	80,579
Total entitlement fees	7,521	1,627	785	6,201	5,616	16,184	4,873	12,246	62,787	117,841
<u>Review time (hrs.)</u>										
Agreement	-	4.50	-	-	5.50	49.00	3.50	4.75	42.00	109.25
Engineering	26.00	34.00	17.00	20.00	47.50	173.50	25.50	36.75	59.00	439.25
Field change	4.00	4.00	-	-	4.00	-	2.00	4.00	-	18.00
Planning	11.50	25.50	17.50	19.00	19.50	50.50	19.50	19.25	43.50	225.75
Record drawing	-	3.00	-	-	-	-	3.00	4.50	1.50	12.00
Total review time	41.50	71.00	34.50	39.00	76.50	273.00	53.50	69.25	146.00	804.25
<u>Other review-related items</u>										
Conditional use	-	-	-	-	1	1	-	-	-	2
Engineer's cost estimate	86,390	67,468	15,584	62,603	269,406	885,708	121,384	571,900	2,835,185	4,915,628
Engineering pages	12	12	10	11	15	32	14	15	28	149
Field change	2	1	-	-	2	-	1	2	-	8
Notices	1	1	1	1	1	2	1	1	4	13
Parking/stormwater/traffic study review	1	-	-	2	1	3	2	1	2	12
Re-reviews	-	4	-	-	-	4	-	-	-	8
Record drawing	-	2	-	-	1	-	1	3	1	8
Temporary use	-	-	-	-	-	-	-	-	-	-
Variance	-	1	1	1	3	-	-	-	-	6

Source: City of Naperville; Houseal Lavigne

2. Cost-Recovery Analysis

This section includes a summary of Houseal Lavigne’s cost-recovery analysis and an overview of our specific recommendations related to potential amendments to the City’s existing development-review fee schedule and process for collecting those fees.

Cost-recovery approach

A cost-recovery analysis is a quantitative examination that compiles the full cost of providing governmental services and activities. There are two primary types of costs considered, including (a) direct (b) and indirect costs. Direct costs are those that specifically relate to an activity or service, including the real-time provision of services. Indirect costs are those that support the provision of services, in general, but cannot be directly or easily assigned to a specific activity or service.

Components of the cost-recovery analysis included in this report are as follows:

- **Direct labor costs.** Salary, wage, and benefit expenses TED staff specifically involved in the provision of development-review services and activities.
- **Allocated indirect non-labor costs.** Expenses other than labor for the departments involved in the provision of services. In most cases, these costs are allocated across all services provided by a department, rather than directly assigned to fee categories.
- **Direct non-labor costs.** These are discrete expenses incurred by the City due to a specific service or activity performed, such as noticing fees, third-party charges, and specific materials used in the provision of relevant services or activities.

Sample project data set

Houseal Lavigne utilized data provided by TED staff, including actual fee and level-of-effort (LOE) data for nine selected projects completed within the last fiscal year. These are described in more detail below with **C-** indicating a commercial project, **MU-** a mixed-use project, and **R-** a residential project.

- **C-1:** Major change to a PUD to grant a conditional use to allow a daycare center (new construction) within an existing commercial shopping center. The proposed site plan complied with all applicable zoning district regulations, including required parking. The staff-defined complexity level associated with the review was described as “easy.”
- **C-2:** Rezoning, multiple variances, and SSA expansion to accommodate the construction of a new dental office and associated parking within the Downtown. The staff-defined complexity level associated with the review was described as “hard.”
- **C-3:** Variances and engineering review to accommodate the expansion of a drive-through facility at an existing commercial restaurant. The staff-defined complexity level associated with the review was described as “easy.”
- **C-4:** Major change to a PUD, rezoning, conditional use, and multiple variances to accommodate the construction of a new self-storage facility within an existing office development. The staff-defined complexity level associated with the review was described as “medium.”
- **MU-1:** Subdivision, conditional use for multi-family, and variances to accommodate the construction of a mixed-use retail and residential building and associated parking near the

downtown. The staff-defined complexity level associated with the review was described as “medium.”

- **R-1:** Annexation, rezoning, approval of a preliminary plat of subdivision, approval of a conditional use for multi-family dwelling units, and multiple variances to accommodate the construction of a 146-unit multi-family age-restricted rental residential building. The staff-defined complexity level associated with the review was described as “hard.”
- **R-2:** Rezoning and subdivision to construct nine single-family attached townhomes on the subject property. The staff-defined complexity level associated with the review was described as “easy.”
- **R-3:** Subdivide the subject property, vacate a portion of the public right of way, and approve variances to the Design Manual for Public Improvements to accommodate the development of 10 new single-family homes. The staff-defined complexity level associated with the review was described as “medium.”
- **R-4:** Annexation, rezoning, subdivision, vacate of a portion of right-of-way, subdivision deviations, and zoning variances to accommodate the development of 105 age-restricted dwellings. The staff-defined complexity level associated with the review was described as “hard.”

Cost-recovery analysis summary

Table 2.1 below summarizes our cost-recovery analysis:

Table 2.1: Cost-recovery analysis summary

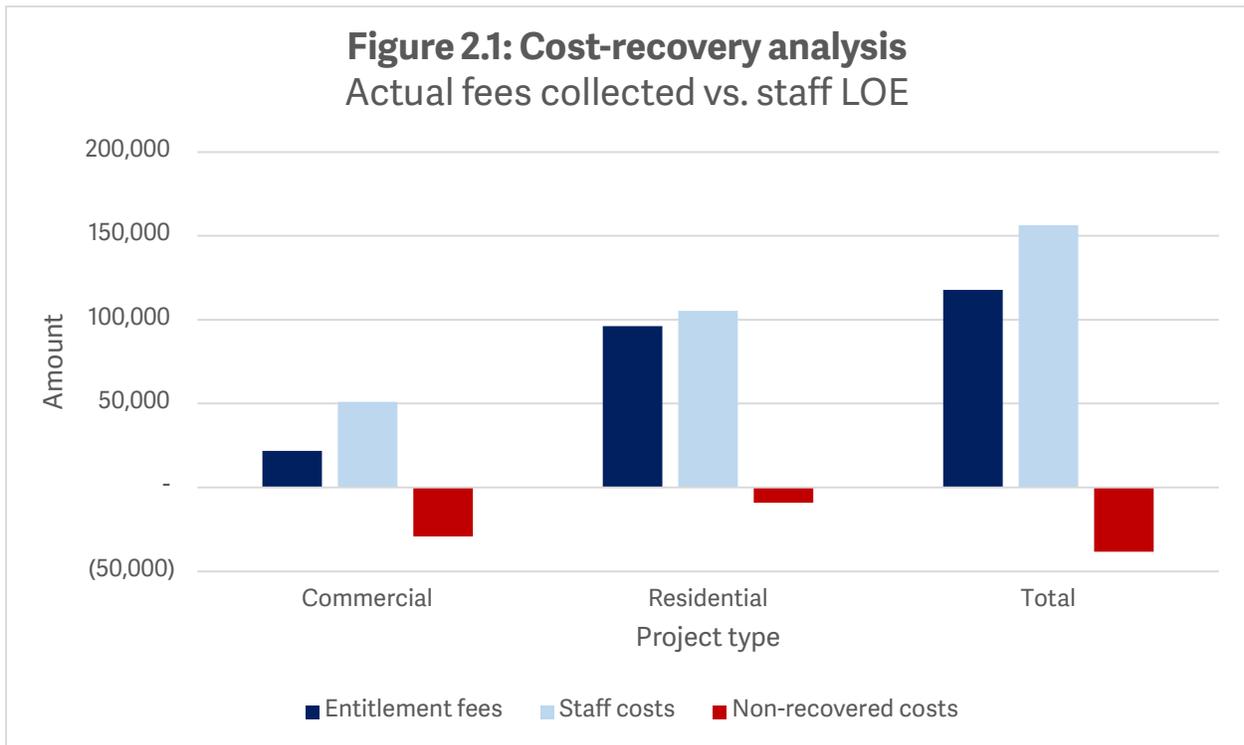
	Commercial	Residential	Total
Planning fees	\$ 14,005	23,257	37,262
Engineering fees	7,745	72,834	80,579
Total fee revenue	21,750	96,091	117,841
Direct labor costs	(15,630)	(32,256)	(47,886)
Indirect costs	(35,361)	(72,979)	(108,341)
Total labor costs	(50,991)	(105,236)	(156,227)
Surplus/(deficit)	(29,241)	(9,145)	(38,386)
Cost-recovery pct.	42.7%	91.3%	75.4%

As shown above—and based specifically on the sample set of data from nine actual projects provided by TED staff—the City is currently recovering just over 75 percent costs associated with its development review process. This observation suggests the following critical points:

- The City’s existing entitlement fees—when viewed in light of TED staff’s current level of effort and workflow process associated with application reviews—provide for a reasonable cost-recovery percentage;
- The entitlement fees recommended in this report should not exceed a reasonable cost of providing services (i.e., the cost-recovery percentage achieved by fees should not be higher than 100 percent);

- Without the benefit of completing a more comprehensive cost-recovery analysis, such as the one described above, the City should refrain from increasing any particular development-review fee much more than 25 to 30 percent.
- While our scope of our work does not include a detailed examination of cost recovery by specific type of fee, it would not be surprising to find that some fees could be reduced, while others could afford to be increased to align better within services within the department’s current operating procedures.

Figure 2.1 below summarizes the results of our cost-recovery analysis graphically, with entitlement fees shown in dark blue, staff level-effort cost in light blue, and the difference between the two amounts (deficits in all cases included in our analysis) shown in red.



Detailed calculations by specific sample projects are shown on the following page in Table 2.2.

Table 2.2: Cost-recovery analysis (existing fee structure)

	C-1	C-2	C-3	C-4	MU-1	R-1	R-2	R-3	R-4	Total
Entitlement fees										
Planning fees	5,405	925	405	5,695	1,575	1,570	2,870	2,810	16,007	37,262
Engineering fees	2,116	702	380	506	4,041	14,614	2,003	9,436	46,781	80,579
Total entitlement fees	7,521	1,627	785	6,201	5,616	16,184	4,873	12,246	62,787	117,841
Review costs										
Direct labor costs	(2,471)	(4,227)	(2,054)	(2,322)	(4,555)	(16,255)	(3,185)	(4,123)	(8,693)	(47,886)
Indirect costs	(5,590)	(9,564)	(4,648)	(5,254)	(10,305)	(36,776)	(7,207)	(9,329)	(19,668)	(108,341)
Total labor costs	(8,061)	(13,792)	(6,702)	(7,576)	(14,860)	(53,031)	(10,392)	(13,452)	(28,361)	(156,227)
Cost-recovery summary										
Surplus/(deficit)	(540)	(12,165)	(5,917)	(1,375)	(9,244)	(36,847)	(5,520)	(1,206)	34,426	(38,386)
Cost-recovery pct.	93.3%	11.8%	11.7%	81.9%	37.8%	30.5%	46.9%	91.0%	221.4%	75.4%

Source: City of Naperville; Houseal Lavigne

3. Proposed Fee Revisions

Considering the cost-recovery analysis described in the previous section and the City’s primary objectives outlined in Section 1, Houseal Lavigne has prepared a comprehensive set of recommendations related to potential amendments to its existing entitlement-fee schedule and collection process. Houseal Lavigne employed a four-step approach in formulating proposed revisions to the City’s current fee schedule and collection process:

1. Assess base fee by process type
2. Assess engineering fees
3. Assess “add-on” fee(s) for additional services
4. Assess fee(s) for post-entitlement work

In the pages that follow, we summarize our proposed fee revisions and provide a rationale for each suggested new fee amount.

Base fees

These fees align with the five development-review processes established by TED staff in its implementation of EnerGov, a software solution for enterprise workflow and process regulation.

Table 3.1: Base fees by process

Process	Description	Fee
1	PZC-CC (annexation)	\$ 4,000
2	PZC-CC (non-annexation)	3,000
3	CC only	2,000
4	Administrative	500

It should be noted that these base fees are inclusive of what were previously “a-la-carte” fees based on the specific entitlement being sought by applicants. By employing a process-based fee structure, the calculation of fees becomes vastly more streamlined.

Engineering review fees

Per TED staff, engineering fees for residential projects, under the current fee system, cannot be collected until a project is completed because it is only at that point that fees can be calculated based on an engineer’s estimate of public-improvement costs. In some instances, it could be years before the project is ready to move to surety and have final engineering cost estimates approved. And for projects that are never completed, no fees can be collected even though at least some level of staff review occurred.

In addition, commercial engineering fees for are currently based on the number of parking spaces in a project—this is problematic, since (1) only a minimum engineering fee of \$418 is collected for commercial projects without a parking component, and (2) the number of parking spaces, per staff, is a poor indicator of the level of effort involved in the review of engineering plans for commercial projects.

Given the challenges noted above, we have proposed engineering fees be calculated on a per-page basis, for both preliminary and final engineering reviews. Under this structure, fees for engineering plans will be submitted prior to review, and the per-page fee will directly correspond to the volume of

work to be reviewed. **Table 3.2** below summarizes our proposed engineering fees for commercial and residential engineering plan reviews:

Table 3.2: Engineering review fees

	Commercial	Residential
Preliminary engineering fee	\$ 25 per page	25 per page
Final engineering fee	150 per page	150 per page

Add-on fees

In addition to base and engineering fees, applicants will only be assessed additional fees in specific cases where extraordinary, highly variable staff level-of-effort is involved, including reviews that include four or more re-submittals, and annexation or other agreements. These proposed add-on fees are summarized in Table 2.3 below:

Table 3.3: Add-on fees

	Process 1	Process 2	Process 3	Process 4
Re-review fee	\$ 1625	1250	500	250
Agreement fee	Variable	Variable	Variable	n/a
Parking/stormwater/traffic study review	400	400	400	400
Noticing fee	Direct bill	Direct bill	Direct bill	100

Re-review fees

Up to three reviews by TED staff of submittals are included in the base fee. For any resubmittals beyond this point, applicants will be charged a re-review fee equal to 25 percent of the applicable base fee.

Agreement fees

For agreements, flat fees will be assessed based on staff’s determination of the level of complexity involved. These include “basic,” “standard,” and “complex.” Each agreement fee is described further below:

- **Basic agreements** typically take five hours or fewer to process and are assessed at a flat fee of \$250.
- **Standard agreements** assume more than five hours but fewer than 20 hours of staff time, including up to two meetings and are assessed at a flat fee of \$500.
- **Complex agreements** assume more than 20 hours of staff time and three or more meetings. Projects falling into this category may be multi-jurisdictional, require additional technical expertise, customized language and exhibits, unique provisions, and detailed negotiations. Given this higher level of complexity, a flat fee of \$1,000 will be assessed.

Parking/stormwater/traffic study review

Per input from City staff, we have recommended a flat fee of \$400 for the review of parking stormwater, and traffic studies (assuming a total of no more than eight hours of staff review time).

Noticing fees

We recommend that fees for public noticing be directly billed to the applicant for the actual costs of publication, with the exception of a flat fee of \$100 for Process 4.

Post-entitlement fees

Like add-on fees, the City does not currently collect fees for field changes and record drawings. We recommend that the City assess a flat fee of \$300 for each field change or record drawing, across all four process types. Our recommendations for post-entitlement fees are summarized in **Table 3.4** below:

Table 3.4: Post-entitlement fees

	Process 1	Process 2	Process 3	Process 4
Field changes	\$ 300	300	300	300
Record drawings	300	300	300	300

Site permit fees

In addition, we have included recommendations for site permit fees. Specifically, staff has recommended that charges for site permit fees should be based on the engineer's cost estimate for the actual installation of public improvements with commercial projects being assessed at 1.65 percent of cost and residential projects at 1.50 percent. **Table 3.5** below summarized our recommended charges for post-entitlement activities:

Table 3.5: Site permit fees

	Process 1	Process 2	Process 3	Process 4
Commercial site permits	1.65%	1.65%	1.65%	1.65%
Residential site permits	1.50%	1.50%	1.50%	1.50%

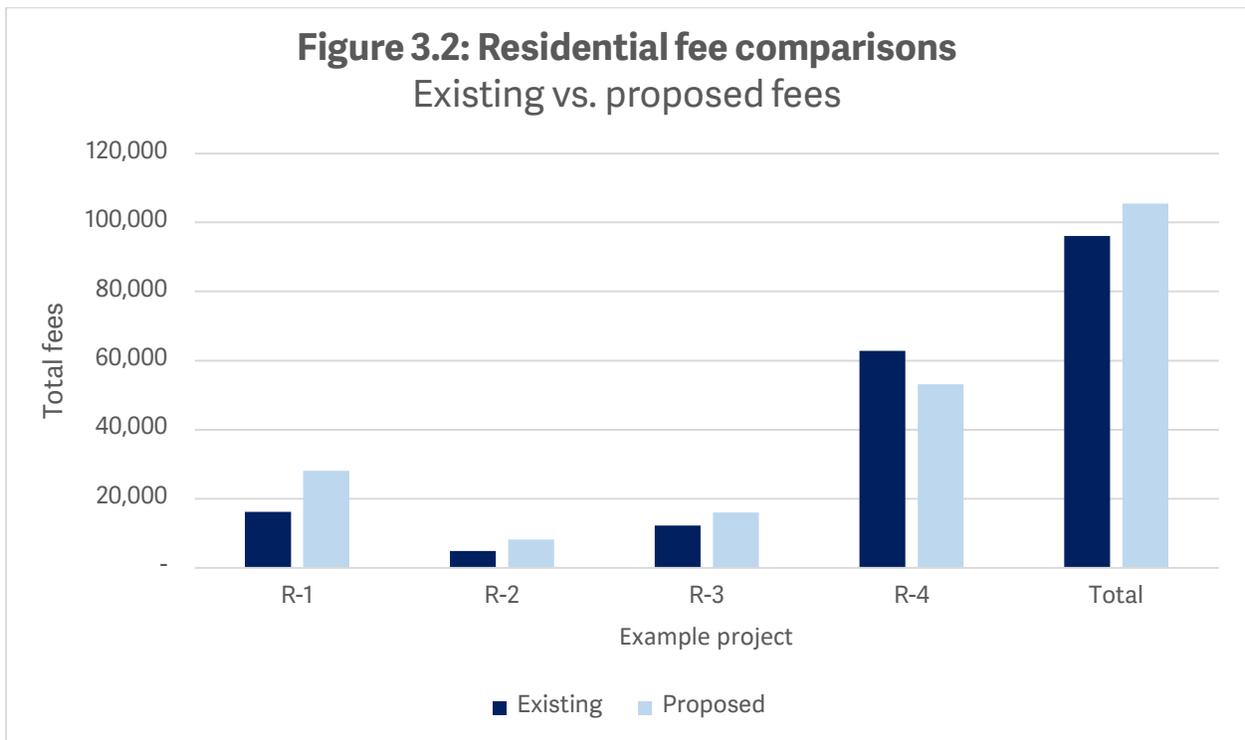
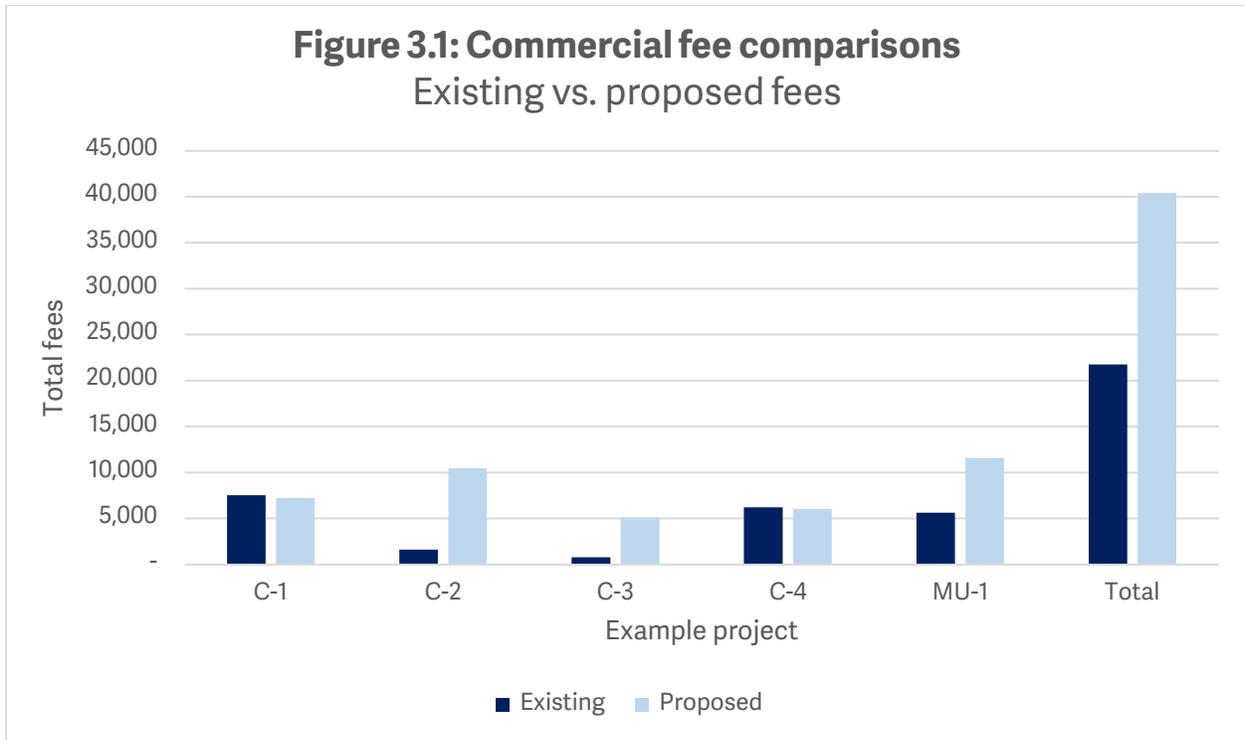
Existing vs. proposed fees

Table 3.6 below provides a comparison between the City's existing fee schedule and Houseal Lavigne's proposed fee-schedule amendments by applying our proposed fee revisions to the sample project data set discussed in the previous section.

Table 3.5: Existing vs. proposed fees

	Existing fees	Proposed fees	Variance
Entitlement fees	\$ 37,262	29,000	(8,262)
Engineering fees	80,579	26,075	(54,504)
Add-on fees	-	16,350	16,350
Post-entitlement fees	-	4,800	4,800
Site permit fees	-	74,487	74,487
Total fee revenue	117,841	150,912	32,871
Direct labor costs	(47,886)	(47,886)	-
Indirect costs	(108,341)	(108,341)	-
Total labor costs	(156,227)	(156,227)	-
Surplus/(deficit)	(38,386)	(5,515)	32,871
Cost-recovery pct.	75.4%	96.5%	27.9%

As the table above illustrates, the proposed fee structure results in an improved cost-recovery of about 97 percent, achieved through a net increase in fees of approximately 28 percent. **Figures 3.1** and **3.2** on the following page, illustrate the differences between existing and proposed fees by project type.



4. Regional Survey

The purpose of this section is to provide a comparison of the City’s existing entitlement fees to provide a sense of the local market pricing for services and to use that information to gauge the impact of recommendations for fee adjustments proposed by Houseal Lavigne’s report and staff recommendations.

It should be noted that comparative surveys do not provide information about the cost-recovery policies or procedures inherent in each comparison community. A “market-based” decision to price services at below the cost-recovery analysis results is the same as deciding to subsidize that service. Also, comparative communities may or may not base their fee amounts on the estimated and reasonable cost of providing services.

In addition, comparative fee survey efforts are often non-conclusive for many fee categories. Regional and national comparison agencies typically use varied terminology for the provision of similar services. In general, Houseal Lavigne made a reasonable attempt to source each comparison community’s fee schedule from the internet and compile a comparison of fee categories and amounts for the most readily comparable fee items that match the Naperville’s existing fee structure.

Survey sample

Given the vast differences in the manner in which municipalities in the region calculate entitlement fees, Houseal Lavigne selected a large number of communities (20) for our survey sample. These communities include:

Table 4.1: Regional fee survey municipalities

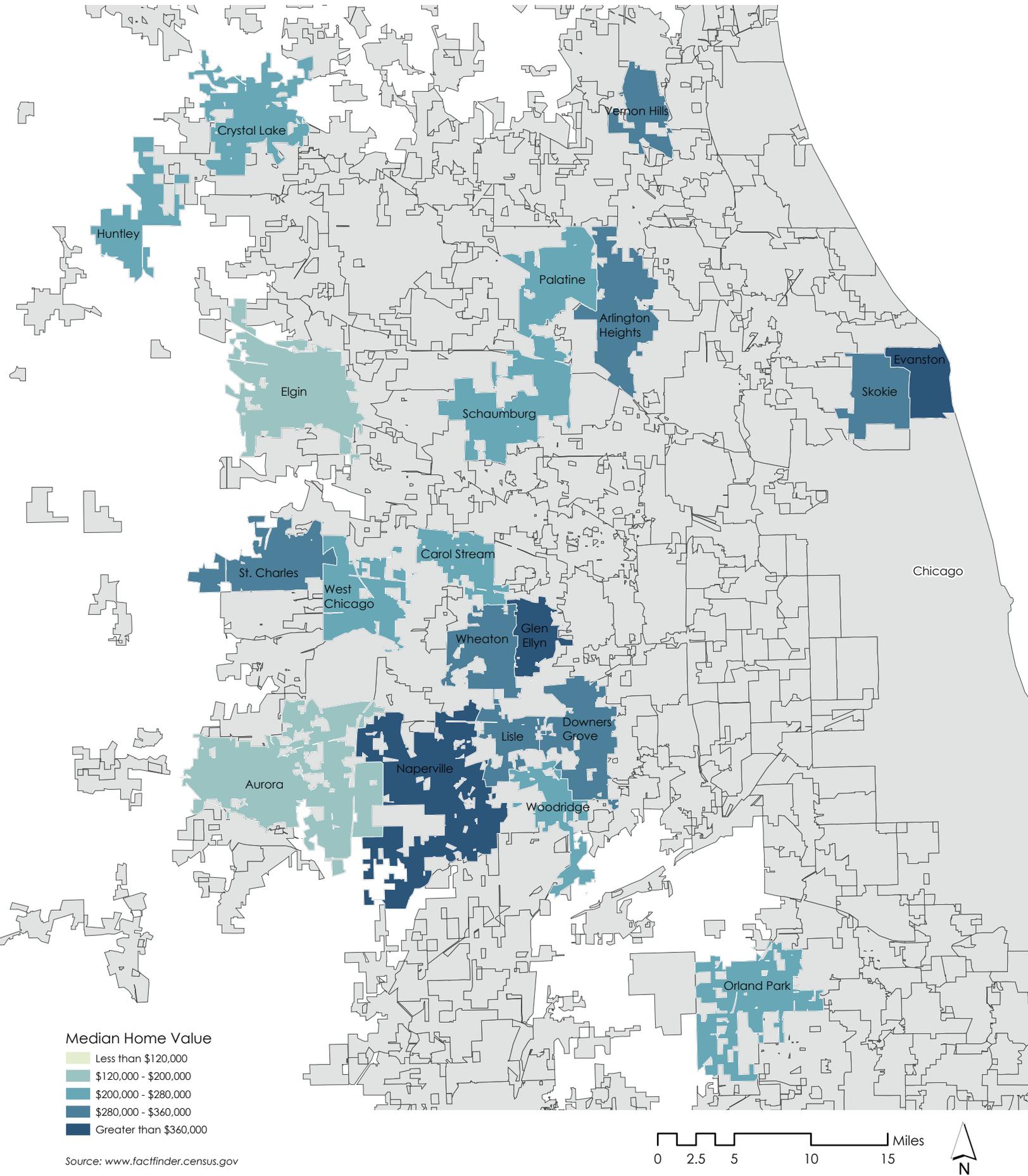
Arlington Heights	Aurora
Carol Stream	Crystal Lake
Downers Grove	Elgin
Glen Ellyn	Highland Park
Huntley	Lake Zurich
Lisle	Oak Park
Orland Park	Palatine
Plainfield	Schaumburg
Skokie	St. Charles
Wheaton	Woodridge

Source: Houseal Lavigne

These communities vary significantly regarding location in the region, land area, population, as well as demographic and market conditions. **Figure 4.1** on the following pages shows the location of each community. In addition, this exhibit highlights the median home value in the municipality—an appropriate measure in comparing the survey sample to the City of Naperville.

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Figure 4.1: Regional Fee Survey



Survey results

Houseal Lavigne summarized regional fee survey data using basic statistical methods of analysis and presentation, including the following measures:

- Minimum,
- 2nd Quartile,
- Median,
- 3rd Quartile, and
- Maximum.

In the pages that follow, we present a summary of our fee-survey data for four entitlement-fee types, including:

1. Annexation fees,
2. PUD fees,
3. Subdivision fees, and
4. Engineering fees.

To compare fees for each community in the sample to the City's existing fees, we calculated hypothetical application fees for one-, six-, and 11-acre subject sites for all fee types, with the exception of engineering fees. The results of our survey are summarized in the pages that follow.

Annexation fees

The City currently assesses a minimum fee of \$550 for all annexation petitions. This amount increases per acre of the subject site, with a maximum fee of \$4,070. As shown in **Table 4.2** below, Naperville's current annexation fees are slightly below that survey sample's median, depending on the acreage of the subject site.

Table 4.2: Annexation fees

	1-Acre	6-Acre	11-Acre
Minimum	\$ 225	225	313
1 st Quartile	491	491	491
Median	750	950	1,150
3 rd Quartile	1,438	2,925	3,625
Maximum	3,900	6,000	11,000
City of Naperville	550	660	1,100

PUD fees

The City currently assesses a minimum fee of \$5,500 for all new PUD petitions. This amount increases per acre of subject site, with a maximum fee of \$20,350. As shown in **Table 4.3** below, Naperville's current PUD fees rank near the highest of the survey sample, with only the City of Evanston's \$6,000 flat fee for new PUDs being comparable.

Table 4.3: PUD fees

	1-Acre	6-Acre	11-Acre
Minimum	\$ 275	275	275
1 st Quartile	1,050	1,063	1,070
Median	1,500	1,725	1,823
3 rd Quartile	2,337	2,475	2,688
Maximum	6,000	6,000	6,140
City of Naperville	5,550	5,500	7,150

Subdivision fees

The City currently assesses a minimum fee of \$2,750 for all subdivision plats. This amount increases per acre of subject site, with a maximum fee of \$8,690. As shown in **Table 4.4** below, Naperville's current subdivision fees are in the upper quartile of the survey sample, depending on the acreage of the subject site.

Table 4.4: Subdivision fees

	1-Acre	6-Acre	11-Acre
Minimum	\$ 200	450	468
1 st Quartile	488	775	786
Median	950	1,100	1,400
3 rd Quartile	1,716	1,903	2,488
Maximum	7,300	7,300	10,000
City of Naperville	2,750	2,750	4,400

Engineering fees

The City currently assesses an engineering review fee of 1.50 percent of an approved engineer's cost estimate for residential projects. As noted earlier, engineering review fees for commercial projects are currently assessed based on the number of parking spaces, with a minimum fee of \$418. As shown in **Table 4.5** below, Naperville's current engineering review fees for residential projects are slightly below that survey sample's median.

Table 4.5: Engineering fees

	Rate
Minimum	1.25%
1 st Quartile	1.50%
Median	1.88%
3 rd Quartile	3.56%
Maximum	4.00%
City of Naperville (residential only)	1.50%

Fee survey conclusions

Entitlement fees vary widely across the survey sample, with Naperville's current fees falling mostly near the median rates. The exception to this pattern, however, is Naperville's current \$5,500 minimum fee for PUD applications. Among the survey communities, only Evanston ranks higher with its flat fee of \$6,000. Given Naperville's relevant similarities with Evanston (e.g., demographics, median home values, and denser downtown areas), this single aberration in the City's current fee levels should not be viewed as alarming. In addition, and most importantly, Houseal Lavigne's recommended fee adjustments would not, on balance, increase the City's existing PUD fees.