

## Implementation Program

The Implementation Program identifies the specific measures to implement *Hall County Forward*. The Implementation Program includes the following elements:

- 2017-2021 Community Work Program
- Description of Specific Actions
- Supplemental Plans
- Long Term Projects List
- Plan Maintenance

### ■ Community Work Program

The Community Work Program (CWP), shown in Table 5-1, identifies specific implementation actions the County and other entities intend to take during the first five-year timeframe of the planning period. This includes programs, ordinances, administrative systems, community improvements or investments, and financing arrangements or other programs/initiatives to be put in place to implement *Hall County Forward*. For each action the CWP outlines the following information:

- Type of action/strategy
- Brief description
- Timeframe for undertaking the activity (2017, 2018, 2019, 2020, 2021)
- Estimated cost
- Responsible party for implementing the activity
- Funding source
- Strategy reference number (from Chapter 3: Community Vision)

Table 5-1 Hall County 2017-2021 Community Work Program

Action/ Implementation Strategy	Time Frame					Cost Est.	Responsible Party*	Funding Source	Strategy Ref. Number
	17	18	19	20	21				
<b>Regulations</b>									
Prepare a Unified Development Code to update, consolidate and streamline land use and development regulations and to support the goals of the Comprehensive Plan		✓	✓			\$80,000	Planning & Zoning	GF	DP 1.3, DP 2.1, DP 2.2, DP 2.3, DP 3.1, DP 4.1, DP 4.2, DP 4.3, DP 4.4, DP 5.1, RC 1.5, RC 1.9
Require a "Agricultural Use Notice" statement on final plats		✓				Staff Time	Planning & Zoning	GF	DP 1.3
Evaluate the effectiveness of the County's tree protection standards and identify potential amendments, as necessary		✓				Staff Time	Planning & Zoning	GF	DP 2.1
Evaluate the effectiveness of the County's Conservation Subdivision Design Option and identify potential amendments, as necessary		✓				Staff Time	Planning & Zoning	GF	DP2.1
Incorporate minimum open space requirements into the Planned Development zoning classification			✓			Staff Time	Planning & Zoning	GF	DP 2.2
Evaluate zoning buffer standards to ensure they are sufficient where commercial or industrial uses abut residential properties and identify potential amendments, as necessary		✓				Staff Time	Planning & Zoning	GF	DP3.1
Amend regulations to reinforce infrastructure requirements for single-family development (based on commonly applied conditions of zoning)			✓			Staff Time	Planning & Zoning	GF	DP 4.1
Review use and outdoor storage/display standards in the Gateway Corridor Overlay District to identify appropriate locations and screening requirements		✓				Staff Time	Planning & Zoning	GF	DP 4.2
Assess compatibility of municipalities' corridor standards / design guidelines with the County's; identify any requirements that could enhance the quality of development in the County		✓				Staff Time	Planning & Zoning	GF	DP 4.3
Review existing regulations for impediments to special housing needs and opportunities such as senior housing, accessory dwelling units, and affordable housing		✓	✓			Staff Time	Planning & Zoning	GF	DP 5.1
Establish buffer requirements for the portion of the Chatahoochee River not under the jurisdiction of the U.S. Army Corps of Engineers	✓					Staff Time	Engineering	GF	RC 1.9
<b>Functional Plans</b>									
Update the South Hall County Sewer System Master Plan					✓	\$50,000	Engineering	Sewer, SPLOST	SED 1.4, RC 1.6
Update the 2008 Recreation Master Plan; address parks, greenspace, recreation and trails		✓	✓			\$50,000	Parks & Leisure Services, Chamber Greenspace Cmte.	100% Impact Fees	RC 3.1, RC 3.2, RC 3.3, RC 3.4, RC 3.5
Prepare a county-wide Economic Development Plan			✓			\$50,000	Chamber, Joint Municipal Association	GF	SED 1.5
Implement the recurring items in the Metropolitan North Georgia Water Planning District's Water Resource Management Plan	✓	✓	✓	✓	✓	Staff Time	Engineering	GF	RC 1.1

Table 5-1 Hall County 2017-2021 Community Work Program

Action/ Implementation Strategy	Time Frame					Cost Est.	Responsible Party*	Funding Source	Strategy Ref. Number
	17	18	19	20	21				
Prepare a Historic Preservation Plan				✓		\$35,000	Planning & Zoning, Chamber	GF	RC 4.1
Coordinate with the Georgia Environmental Protection Division on its Total Maximum Daily Load (TMDL) Implementation Plan for Lake Lanier to address pollutants	✓	✓	✓	✓	✓	Staff Time	Engineering	Sewer	RC 1.7
<b>Small Area/Master Plans</b>									
Implement the recommendations from the neighborhood-level planning effort with the Morningside Heights, Black and Cooley Drive, and Gaines Mill Road Communities	✓	✓	✓	✓	✓	Staff Time	Board of Commissioners, County Staff, Concerned Citizens of Gainesville and Hall County	GF	SED 2.2, SED 2.3, SEC 2.3a – SEC 2.3r
Participate in the update to the U.S. Army Corps of Engineers' Lake Lanier Master Plan	✓	✓	✓			Staff Time	County Administration, Planning & Zoning, Parks & Leisure Services	GF	RC 1.3
East-West Corridor Study			✓			\$100,000	Gainesville-Hall MPO	PL	DP 6.1
<b>Process/Program</b>									
Continue to work with the Greater Hall Chamber of Commerce in support of their economic development initiatives	✓	✓	✓	✓	✓	Staff Time	BOC, County Administration	GF	SED 1.1
Coordinate with the Lake Lanier Convention and Visitors Bureau to promote agritourism in the county	✓	✓	✓	✓	✓	Staff Time	BOC, County Administration	GF	SED 1.6
Use the Future Development Map to guide sewer expansion planning				✓	✓	Staff Time	Engineering, Planning & Zoning	GF	SED 1.3, RC 1.1
Maintain residential or agricultural use as the primary use(s) along roadways that do not have a "Corridor" designation on the Future Development Map	✓	✓	✓	✓	✓	Staff Time	Planning & Zoning	GF	DP 3.2
Create a process and set of criteria that identifies land for permanent protection (during Recreation Plan update)		✓	✓			Staff Time	Parks & Leisure Services Chamber Greenspace Cmte.	GF	RC 3.2
Coordinate with the Georgia Department of Community Affairs to seek Less Developed Census Tract designation for the Chicopee Mill area along Atlanta Highway		✓	✓			Staff Time	Chamber, BOC	GF	SED 2.1
Submit a new application to the Georgia Department of Community Affairs for Opportunity Zone designation for the Candler Road Area identified in the 2012 Urban Redevelopment Plan		✓	✓			Staff Time	Chamber, BOC	GF	SED 2.2
Promote the Healan's-Head's Mill Visitor's and Heritage Center upon its completion	✓	✓	✓	✓	✓	Staff Time	Chamber, Convention and Visitors Bureau, County Administration	GF	RC 4.5
Designate an existing county employee position to promote and implement greenspace recommendations (from the Recreation Plan update) and to liaise with the Chamber's Greenspace Committee		✓	✓	✓	✓	Staff Time	County Administration	GF	RC 3.5

Table 5-1 Hall County 2017-2021 Community Work Program

Action/ Implementation Strategy	Time Frame					Cost Est.	Responsible Party*	Funding Source	Strategy Ref. Number
	17	18	19	20	21				
Promote public awareness of annual community and lake clean-up events	✓	✓	✓	✓	✓	Staff Time	BOC, Lake Lanier Association, Keep Hall Beautiful	GF	RC 2.2
Leverage SPLOST funds to address shoreline erosion and abandoned vessel removal on Lake Lanier	✓	✓	✓	✓	✓	Staff Time	BOC, Lake Lanier Association, DNR, USACE, Private donors	SPLOST	RC 2.3
Partner with and promote local recycling initiatives and events	✓	✓	✓	✓	✓	Staff Time	BOC, Hall County Schools, Keep Hall Beautiful	GF	RC 2.4
Partner with Gainesville on pollution prevention activities and public outreach	✓	✓	✓	✓	✓	Staff Time	BOC, City of Gainesville	GF	RC 2.5
Continue to support and promote Green Hall Alliance and its activities	✓	✓	✓	✓	✓	Staff Time	BOC	GF	RC 2.6
Identify eligible projects for federal Sec. 319(h) Nonpoint Source Implementation Grants to address pollutants in impaired waters			✓	✓	✓	Staff Time	Engineering, USDA National Resources Conservation Office	GF	RC 2.7
<b>Inventory/Assessment</b>									
Research the requirements needed to participate in the National Flood Insurance Program's (NFIP) Community Rating System (CRS) Program to potentially reduce flood insurance premium rates	✓	✓				Staff Time	Engineering	GF	RC 1.8
Review regulations for any impediments to low impact development (LID) or green infrastructure approaches to stormwater management		✓				Staff Time	Engineering	GF	RC 1.5, DP 4.4
Evaluate potential waterways suitable for placement of additional litter traps		✓	✓			Staff Time	Engineering	GF	RC 1.4, RC 2.5
Identify funding to complete the Healan's-Head's Mill Historic Preservation Project	✓	✓	✓			TBD	County Administration, BOC		RC 4.4
Evaluate and promote options for the permanent conservation of land		✓	✓	✓	✓	Staff Time	County Administration, Parks & Leisure, Chamber Green-space Cmte.	GF	RC 1.2
Identify additional trail segments to expand the Highlands to Islands Trail System (during Recreation Plan update)		✓	✓			Staff Time	Parks & Leisure Services Chamber Green-space Cmte.	GF	RC 3.3
Identify mechanisms and funding sources, including consideration of future SPLOST and impact fees, for greenspace protection and Highlands to Islands Trail construction (during Recreation Plan update)		✓	✓			Staff Time	Parks & Leisure Services Chamber Green-space Cmte., County Administration	GF	RC 3.4
Coordinate and discuss affordable / workforce housing-related needs and initiatives with the cities, Habitat for Humanity, and other public or private stakeholders		✓	✓	✓	✓		BOC, JMA, Habitat for Humanity, County Administration, Planning & Zoning	GF	DP 5.2
<b>Community Improvements/Infrastructure Projects</b>									
Implement projects from the 2014 Bicycle and Pedestrian Plan			✓	✓	✓	TBD	Engineering	SPLOST, GF	DP 6.2
Extend sewer to targeted business/industrial development locations	✓	✓	✓	✓	✓	TBD	Engineering	SPLOST	SED 1.3

Table 5-1 Hall County 2017-2021 Community Work Program

Action/ Implementation Strategy	Time Frame					Cost Est.	Responsible Party*	Funding Source	Strategy Ref. Number
	17	18	19	20	21				
Construct and operate a new regional material recycling facility (MRF)				✓	✓	TBD	Engineering, Public Works	Landfill, SPLOST	RC 2.8
Continue to seek innovative approaches to landfill operations to extend its life	✓	✓	✓	✓	✓	TBD	Engineering, Public Works	Landfill	RC 2.8
Update Impact Fee Program and Amend Capital Improvements Element (CIE)		✓				\$60,000	Planning & Zoning, Finance	100% Impact Fees	RC 3.4
Library collection materials	✓	✓	✓	✓		\$300,000	Library	100% Impact Fees	CIE project
Gainesville Library expansion		✓	✓	✓	✓	\$4,200,000	Library	20% Impact Fees, 80% SPLOST / State of GA	CIE project
Fire Station #17		✓	✓	✓		\$1,425,163	Fire Dept.	10% Impact Fees, 90% SPLOST	CIE project
Fire Apparatus for Station #17		✓				\$780,000	Fire Dept.	10% Impact Fees, 90% SPLOST	CIE project
Fire Station #18		✓	✓	✓	✓	\$1,433,650	Fire Dept.	10% Impact Fees, 90% SPLOST	CIE project
Fire Apparatus for Station #18			✓			\$780,000	Fire Dept.	10% Impact Fees, 90% SPLOST	CIE project
Soccer Fields (10)			✓	✓	✓	\$4,667,599	Parks & Leisure	100% Impact Fees	CIE project
Tennis Courts (8)			✓	✓	✓	\$466,994	Parks & Leisure	100% Impact Fees	CIE project
Playgrounds (10)		✓	✓	✓	✓	\$1,655,374	Parks & Leisure	100% Impact Fees	CIE project
East Hall Precinct				✓	✓	\$899,585	Sheriff	10% Impact Fees, 90% SPLOST	CIE project
Jail Expansion (Phase II)					✓	\$9,476,600	Sheriff	100% Impact Fees	CIE project

## ■ Description of Specific Actions

This description of specific actions provides additional information related to recommended regulatory updates (i.e. zoning, subdivision regulations), and new and updated plans. Each description for the regulations and plans references the specific strategies presented in Chapter 3, and the descriptions for the regulatory changes also cite the Character Areas implemented by the specific action.

### Regulatory Updates

Evaluation and adoption of changes to land use and development regulations is a common follow-up after completion of a comprehensive plan. The purpose of updates to local regulations is to ensure that local governments' development tools support and implement the goals and strategies outlined in Chapter 3: Community Vision, as well as the Character Areas and development patterns described in Chapter 4: Future Development Guide. The following tasks are recommended, which may result in the need to amend land use and development regulations:

- *Require an "Agricultural Use Notice" statement on final plats to inform the owner, occupants and uses of a property adjacent to an agricultural use or zoning classification that there may be potential impacts from lawful agricultural operations; consider similar language for zoning proposals and building permits (DP Strategy 1.3)*
- *Evaluate the effectiveness of the County's tree protection standards and Conservation Subdivision Design Option and identify potential amendments, as needed (DP Strategy 2.1)*
- *Incorporate minimum open space requirements into the Planned Development zoning classifications (residential, commercial, office and industrial) (DP Strategy 2.2)*
- *Evaluate minimum buffer standards in the Zoning Ordinance to ensure they are sufficient where commercial or industrial uses abut residential properties (DP Strategy 3.1)*
- *Amend regulations to incorporate common conditions of zoning (conditions that are routinely approved as part of a rezoning and are not currently found in the Zoning Ordinance) that are used to ensure a high quality of development and the provision of adequate infrastructure by an applicant (DP Strategy 4.1)*
- *Evaluate use and outdoor storage and display standards of the Gateway Corridor Overlay District to ensure uses requiring outdoor storage/display are appropriately located and screened (DP Strategy 4.2)*
- *Where roadways cross both county and city lines, evaluate corridor-specific standards and design guidelines applied by the municipalities to identify any requirements that could enhance the County's requirements (DP Strategy 4.3)*
- *Review existing regulations for impediments to special housing needs and opportunities such as senior housing, accessory dwelling units, and affordable housing (DP Strategy 5.1)*
- *Review the county's zoning and subdivision regulations for any impediments to low impact development (LID) or 'green infrastructure' approaches to stormwater management, which can lower the amount of untreated stormwater discharging to surface waters; assess findings to identify potential regulatory modifications (RC Strategy 1.5)*
- *Establish buffer requirements for the portion of the Chattahoochee River not under the jurisdiction of the U.S. Army Corps of Engineers, consistent with the Georgia Department of Natural Resources' rules for river corridor protection (RC Strategy 1.9)*

### Detailed Planning Studies

**Functional plans** that address a community facility/service or planning topic and **small area / master plans** that focus on a specific geographic area may be prepared and adopted as implementing measures of the Comprehensive Plan. These are more detailed planning studies to meet certain goals described

within the plan. The facility improvements recommended by these plans will conform to the overall Comprehensive Plan. The following planning studies are recommended, with the supporting strategy from Chapter 3 identified:

### *Parks and Greenspace Master Plan*

An update to the 2008 Hall County Parks and Recreation Master Plan would recommend additional park and recreation needs based on updated population projections. It would also provide an opportunity to address and integrate greenspace and trails into the county-wide plan. An expanded update to the county recreation plan can help Hall County identify potential opportunities for permanently protecting greenspace. In addition, the plan can evaluate greenway opportunities and trail connections, including expansion of the Highlands to Islands Trail system.

- *Prepare a Parks and Greenspace Master Plan (a comprehensive update to the county's 2008 Parks and Recreation Plan), resulting in recommendations that will address parks, recreation, trails and greenspace (RC Strategy 3.1)*
- *Create a process that identifies land for permanent protection based upon a standard set of criteria, such as the recreational, ecological, environmental, aesthetic, cultural, historic or agricultural value; this process will be developed and described in the Parks and Greenspace Master Plan (RC Strategy 3.2)*
- *Identify additional segments during the development of the Parks and Greenspace Master Plan to expand the Highlands to Islands Trail System (RC Strategy 3.3)*
- *Identify mechanisms and funding sources – including consideration of future Special Purpose Lost Option Sales Tax (SPLOST) revenue and impact fees – for the permanent protection of land and land acquisition/construction costs for the Highlands to Islands Trail (RC Strategy 3.4)*

### *Economic Development Plan*

A countywide plan can provide a mechanism for the County and its municipalities to coordinate economic development goals and efforts in conjunction with the Greater Hall Chamber of Commerce. In general an Economic Development Plan sets policy direction for economic growth and identifies strategies, programs, and projects to improve the economy.

- *Partner with the Chamber of Commerce and the Hall County Joint Municipal Association to prepare a county-wide Economic Development Plan (SED Goal 1.5)*

### *Historic Preservation Plan*

A Historic Preservation Plan can help Hall County protect historic resources and identify ways to promote its heritage as an economic development tool. Both the 2012 Historic Resources Survey of unincorporated Hall County (prepared by the University of Georgia's College and Environment Design) and the public-private Healan's- Head's Mill restoration project can inform the planning process.

- *Prepare a Historic Preservation Plan to promote general awareness of historic resources throughout unincorporated Hall County, prioritize protection for different resources, and encourage heritage tourism as an economic development tool (RC Strategy 4.1)*

### *Neighborhood Revitalization Study*

During the development of *Hall County Forward*, a neighborhood level study of the Morningside Heights area was undertaken to identify residents' concerns and goals for the traditionally underserved community east of downtown Gainesville. Recommendations for the area are listed below and are intended to be implemented as a coordinated effort by Hall County and the Concerned Citizens of Gainesville and Hall



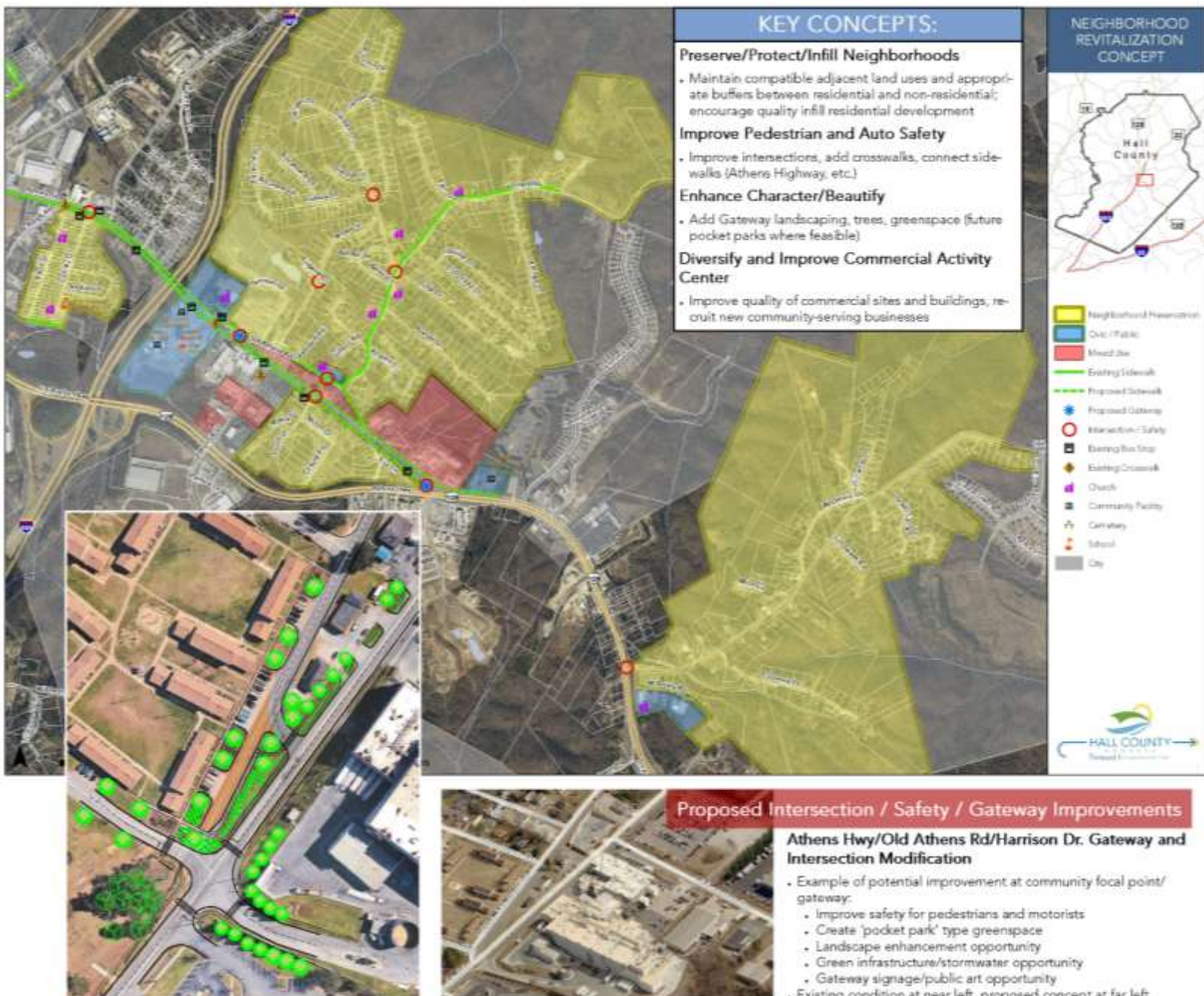
County, Georgia. Representative examples for certain items are also included to assist with implementation.

- *Consistently enforce county codes pertaining to outdoor storage and junk items, inoperable vehicles, and litter (SED Strategy 2.3a)*
- *Increase Sheriff's patrols to address the high frequency of cars running all-way stops and to prevent criminal activity (SED Strategy 2.3b)*
- *Assess the ability to form a local Neighborhood Watch, with the assistance of the Sheriff's Office Public Information and Community Services Unit (SED Strategy 2.3c)*
- *Evaluate the best long-term measures for addressing speeding on local streets based on input from the Hall County Traffic Engineering Neighborhood Traffic Calming Program and the Sheriff's Office (SED Strategy 2.3d)*
- *Prioritize sidewalk and street lighting needs based on frequency of use and access to local transit stops (SED Strategy 2.3e)*
- *Continue to identify properties suitable for federal Community Home Investment Program (CHIP) and Neighborhood Stabilization Program (NSP) grants to assist with home repairs/rehabilitation and to provide affordable housing opportunities (SED Strategy 2.3f)*
- *Evaluate options for providing clean-up opportunities in addition to annual Keep Hall Beautiful neighborhood clean-up, such as temporary placement of containers in accessible areas for disposal of bulky or hazardous items (tires, white goods) (SED Strategy 2.3g)*
- *Identify homes suitable for Homes for Heroes and/or the Federal Housing Administration's (FHA) Officer Next Door programs to reduce the costs of purchasing a home and encourage law enforcement officers to live in the community (SED Strategy 2.3h; models include the Cities of Statesboro and Atlanta; also Habitat for Humanity's Secure Neighborhood Initiative)*
- *Identify potential "pocket parks" and trail connections during the update to the county's Parks and Recreation Plan (SED Strategy 2.3i)*
- *Coordinate with the Hall County Master Gardeners to establish planted gateways and community gardens, either as permanent or temporary uses of properties (SED Strategy 2.3j; a local model is Jubilee Farm Community Garden in Gainesville; also Westview (Atlanta) Community Garden)*
- *Research methods for recruiting a small-scale grocery store to the area; one example is a Dollar General Market, which offers a wider variety of produce and dry groceries (SED Strategy 2.3k)*
- *Submit a new application to the Georgia Department of Community Affairs for Opportunity Zone designation that would include the Athens Highway corridor; such a designation allows new or existing businesses to benefit from tax credits upon creating a minimum number of jobs (SED Strategy 2.3l)*
- *Evaluate opportunities for using County-owned property in the area for a neighborhood park (SED Strategy 2.3m)*
- *Improve coordination with the City of Gainesville on zoning, development, and code enforcement issues that relate to properties inside the city limits but are adjacent to the Morningside area (SED Strategy 2.3n)*
- *Research the potential for establishing a non-profit Community Development Corporation (CDC), which could allow interested residents to undertake economic development and residential development activities (SED Strategy 2.3o; models include the following Atlanta neighborhood-based groups: Cabbagetown Initiative CDC, Summech CDC, Reynoldstown Revitalization Corporation, Peoplestown Revitalization Corporation)*
- *Conduct quarterly meetings with Concerned Citizens of Gainesville and Hall County board members and County leadership/staff (SED Strategy 2.3p)*



- Discuss and coordinate housing-related needs and initiatives with the City of Gainesville, Habitat for Humanity, and other public or private stakeholders to maximize the use of financial and staff resources (SED Strategy 2.3q)
- Evaluate the justification for a traffic signal warrant study at the Gaines Mill Road/Athens Highway intersection with the Georgia Department of Transportation (SED Strategy 2.3r)

The following conceptual plan for the community identifies possible sidewalk, safety, gateway, and intersection (pedestrian crosswalk) improvements, as well as recommended future land uses.



***East-West Corridor Study (New)***

An East-West Corridor Study in the North Hall area can determine the viability of a new connection to relieve congestion on Dawsonville Highway and also establish next steps in project development. This study could be conducted in partnership with the Gainesville-Hall Metropolitan Planning Organization, the federally mandated transportation planning.

- *Prepare an East-West Corridor Study to determine the viability of a new connection for relieving congestion on Dawsonville Highway and also establish next steps in project development (DP Strategy 6.1)*

**■ Supplemental Plans**

Supplemental plans are planning documents that address in detail a specific topic or issue of importance to the community and that have applicable project recommendations for Hall County. These plans support the implementation of the Comprehensive Plan by addressing identified goals and strategies in Chapters 3 and 4, and their recommendations should be used by the County to identify and prioritize projects in conjunction with the Community Work Program. The supplemental plans listed below are incorporated into the *Hall County Forward* by reference.

- *Gainesville-Hall Regional Transportation Plan: 2015 Update (RTP Update)*
- *Gainesville-Hall Bicycle and Pedestrian Plan Partial Update (2014)*
- *Gainesville-Hall County Economic Opportunity Gateways Urban Redevelopment Plan (2012)*

**■ Long-Term Project List**

The Long-Term Project List identifies specific strategies from Chapter 3 that the County intends to address beyond the first five-year timeframe of the planning period.

**Table 5-2 Long-Term Project List**

Action/Implementation Strategy	Strategy Ref. No. (see Chapter 3)
Adopt a Historic Preservation Ordinance to meet the eligibility requirements of the Certified Local Government (CLG) Program	RC 4.2
Pursue Certified Local Government (CLG) status to become eligible for federal historic preservation funds	RC 4.3
Update the North Hall County Sewer System Master Plan	RC 1.6, SED 1.4
Evaluate the steps needed to return highly treated wastewater to Lake Lanier to support long-term sustainable water use, as recommended in the Metropolitan North Georgia Water Planning District’s (MNGWPD) Water Resource Management Plan	RC 1.2

**■ Plan Maintenance**

The Board of Commissioners is responsible for maintaining *Hall County Forward* to accurately reflect current community conditions and the community’s vision and priorities for the future. Specific requirements for amendments and updates are described in the Rules of Georgia Department of Community Affairs (DCA) Chapter 110-12-1 “Minimum Standards and Procedures for Local Comprehensive Planning.

**Annual Review**

County staff will provide a status of the plan implementation to the Board of Commissioners on an annual basis. Specifically, the Community Work Program will be reviewed to identify the current status of the implementation measures and an informal progress report will be prepared. If the County chooses, the annual review process can be used to undertake a formal annual update (see below).

**Plan Amendments**

According to the DCA rules, the local government determines when a plan amendment is necessary to address changing circumstances that may have detracted from the usefulness of the plan as a guide to local decision-making.

**Updates to the Comprehensive Plan**

At a minimum, a plan update must be completed every five years, in accordance with the Local Comprehensive Plan Recertification Schedule maintained by DCA. An annual update option is provided for communities wanting to update their plan on a more frequent basis. The annual update requires submittal of a new fifth year for the Community Work Program (CWP) and any changes needed for the other years of the CWP, and if needed, changes can be made to other elements of the Comprehensive Plan. For communities collecting impact fees, an annual update of the CWP is required.