



Village of Four Seasons
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Four Seasons, MO 65049
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August 12, 2026

The Honorable Catherine L. Hanaway
Attorney General of Missouri
Supreme Court Building
207 West High Street
P.O. Box 899
Jefferson City, Missouri 65102

Re: Request for Independent Review — Camden County Public Water Supply District No. 4 Proposed 2026 Impact Fees

Dear Attorney General Hanaway:

The Board of Trustees of the Village of Four Seasons respectfully brings to your attention a proposed schedule of water and sewer impact fees announced by Camden County Public Water Supply District No. 4, a political subdivision serving the Horseshoe Bend area of Camden County. The Village requests an independent review of the proposal, the process by which it was developed, and whether the proposed charges are supported by a lawful, reasonable, transparent, and consistently applied methodology.

The District's materials state that the figures are representative and not yet final. For a standard three-fourths-inch meter, however, the proposal would increase the combined water and sewer impact fee from \$4,568 to \$12,000, approximately 162.7%. The District separately states that standard connection charges of \$2,210 for water and \$2,979 for sewer are added to the impact fee, producing an apparent total up-front District charge of approximately \$17,189 for a standard residential connection. The general multifamily fee appears to increase from \$1,223 per unit to \$6,000 per unit, approximately 390.6%, with a separate \$2,000 amount listed for one-bedroom/one-bath units.

The Village's Inspection Department has confirmed a substantial decline in building permits and related fees. Contractors surveyed by Village personnel have identified the District's water and sewer charges as a primary reason project are being directed to other communities. Residents have also complained that the proposed charges will impair housing affordability, discourage reinvestment, and reduce the value and marketability of undeveloped property.

Publicly available comparisons heighten the Village's concern. Lake Ozark lists a combined single-family residential water and sewer connection fee of \$3,000. Camdenton lists \$1,050. St. Charles County Public Water Supply District No. 2 lists combined system-development fees of \$3,680 for a three-fourths-inch connection. Perryville lists combined standard connection fees of \$1,555. While the details vary among utilities, the District's proposed \$12,000 impact fee alone is four times Lake Ozark's listed combined fee and approximately 11.4 times Camdenton's. Adding the District's stated standard connection charges produces an apparent total approximately 5.7 times Lake Ozark's amount and 16.4 times Camdenton's.

Missouri law vests public water supply districts and their boards with substantial authority over district affairs. See §§ 247.050, 247.060, and 247.080, RSMo. That authority carries corresponding duties of lawful administration, faithful stewardship of public resources, and compliance with applicable open-government and public-record requirements. The District's notice, as provided to the Village, does not disclose the underlying cost-of-service study, capital-improvement schedule, capacity analysis, debt assumptions, growth projections, allocation formulas, existing-customer credits, or the derivation of the stated \$25-per-gallon capacity factor. The

Village therefore cannot determine whether the proposal reflects recoverable incremental capacity costs, duplicates costs already recovered through rates or existing connection charges, allocates costs consistently among customer classes, or bears a reasonable relationship to the burden created by a new connection.

The Village does not ask your Office to substitute its policy judgment for that of the District Board, and we recognize that your Office may conclude that some aspects of utility-rate review fall within the jurisdiction of another state agency or require judicial determination. We nevertheless request that your Office evaluate whether the facts warrant inquiry under any authority available to protect Missouri residents and ensure lawful conduct by public entities. At a minimum, we ask your Office to consider or refer for review the following questions:

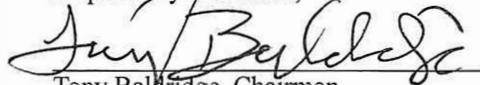
- Whether the proposed fees were developed and will be adopted in compliance with Chapter 247, RSMo, the Missouri Sunshine Law, and all applicable notice, meeting, record-retention, and public-access requirements;
- Whether the District possesses a documented and consistently applied methodology demonstrating a reasonable relationship between each charge and the capacity, infrastructure, or service demands attributable to the new connection;
- Whether the proposed impact fees duplicate amounts recovered through existing user rates, debt service, grants, assessments, prior developer contributions, or the separately stated connection charges;
- Whether the identical water and sewer impact amounts, the meter-size multipliers, and the multifamily classifications are supported by engineering, financial, and cost-of-service evidence rather than arbitrary assumptions;
- Whether the proposal produces unreasonable discrimination among customer classes or places costs on new customers that properly benefit or should be shared by the system as a whole; and
- Whether an audit, investigatory demand, referral to the Missouri Department of Natural Resources, referral to the State Auditor, or other independent review is appropriate.

The Village is prepared to provide the District's notice and proposed schedule, permit and fee data, resident complaints, contractor statements, meeting records, and any additional information your Office requests. We also ask that, if your Office lacks direct jurisdiction over some or all of the issue, this correspondence be forwarded to the appropriate state entity and that the Village be advised of the referral.

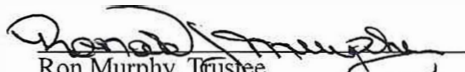
The Horseshoe Bend area depends upon cooperation among overlapping public entities and private stakeholders. The Village supports responsible investment in water and wastewater infrastructure, but fees of this magnitude should rest on a transparent, independently verifiable foundation before they alter development patterns and impose substantial burdens on Missouri property owners.

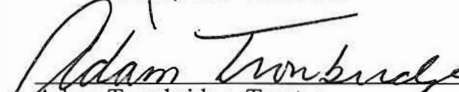
Thank you for your attention to this matter. We respectfully request acknowledgment of this submission and notice of any investigation, referral, or additional information needed.

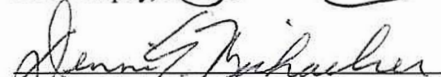
Respectfully submitted,


Tony Baldrige, Chairman


Dave Perdue, Vice Chairman


Ron Murphy, Trustee


Adam Trowbridge, Trustee


Dennis Michaelree, Trustee

Enclosures: Exhibit A - Comparison of Selected Water and Sewer Connection / Development Fees
Exhibit B - Water District Communications

EXHIBIT A - COMPARISON OF SELECTED WATER AND SEWER CONNECTION / DEVELOPMENT FEES

Standard residential connection, unless otherwise noted

Utility / Fee	Combined Amount	Notes
Camden County PWSD No. 4 — proposed impact fee	\$12,000	Impact fee only; connection charges are additional.
Camden County PWSD No. 4 — proposed total standard charge	\$17,189	\$12,000 impact fee + \$2,210 water connection + \$2,979 sewer connection.
City of Lake Ozark	\$3,000	\$2,000 water + \$1,000 sewer for a single-family residence, up to 3/4-inch water and 4-inch gravity sewer.
City of Camdenton	\$1,050	\$900 water hookup + \$150 residential sewer permit.
St. Charles County PWSD No. 2	\$3,680	\$1,580 water + \$2,100 sewer system-development fees; customer also bears specified private installation costs.
City of Perryville	\$1,555	\$665 water + \$890 sewer connection fee for listed standard service sizes.
City of Hannibal	\$650	\$500 estimated 3/4-inch water tap + \$150 sewer tap; actual water labor/material may vary.
City of Sturgeon (inside city limits)	\$2,500	\$1,000 water connection on same side of road + \$1,500 sewer permit; larger or crossroad connections may cost more.

Key comparisons. The proposed \$12,000 impact fee alone is 4.0 times Lake Ozark's listed combined residential connection fee; approximately 11.4 times Camdenton's; approximately 3.3 times St. Charles County PWSD No. 2's combined system-development fees; and approximately 7.7 times Perryville's listed combined connection fees. When the District's stated standard connection charges are added, the proposed \$17,189 total is approximately 5.7 times Lake Ozark's listed amount and 16.4 times Camdenton's listed amount.

District increase. For a standard 3/4-inch meter, the District proposes increasing the combined impact fee from \$4,568 to \$12,000—an increase of \$7,432, or approximately 162.7%. The listed multifamily charge would increase from \$1,223 per unit to \$6,000 per unit for many units, approximately 390.6%, with a separate \$2,000 amount stated for one-bedroom/one-bath units.

Methodological caution. Utilities structure charges differently. Some amounts include meter installation or inspection; others exclude private-side labor, materials, road boring, oversizing, or special assessments. The figures nevertheless provide a useful order-of-magnitude comparison of the up-front public-utility charges imposed on a typical new residential connection.

Sources (official utility or municipal publications, accessed July 22, 2026):

Camden County Public Water Supply District No. 4, "Proposed Impact Fees Starting 2026" and accompanying notice supplied to the Village.

City of Lake Ozark Municipal Code § 705.180(B), Water and Sewer Service and Connections.

City of Camdenton, Water/Sewer Fees & Rates (Code §§ 700.260 and 700.090).

Public Water Supply District No. 2 of St. Charles County, Missouri, Rules and Regulations, Rule 4 (2022 revision).

City of Perryville, Fee Schedule (water and sewer connection fees; water rates updated April 7, 2026).

Hannibal Board of Public Works, Schedule of Rates and Fees, Fiscal Year 2026.

City of Sturgeon Municipal Code § 700.080(B), connection charges.

EXHIBIT B – COMMUNICATIONS FROM WATER DISTRICT



CAMDEN COUNTY PUBLIC WATER SUPPLY DISTRICT #4

P.O. BOX 9, 62 BITTERSWEET ROAD, LAKE OZARK, MO 65049

P: 573-365-6792 F: 573-365-6793

www.camdenpwsd4.com

Proposed Impact Fees Starting 2026

	Water	Sewer	Combined Total Impact
3/4" Meter	\$6,000.00	\$6,000.00	\$12,000.00
1" Meter	\$7,464.00	\$7,464.00	\$14,928.00
1.5" Meter	\$11,615.00	\$11,615.00	\$23,230.00
2" Meter	\$15,718.00	\$15,718.00	\$31,436.00
3" Meter	\$29,901.00	\$29,901.00	\$59,802.00
4" Meter	\$78,730.00	\$78,730.00	\$157,460.00
6" Meter	\$152,948.00	\$152,948.00	\$305,896.00
8" Meter	\$240,722.00	\$240,722.00	\$481,444.00

Multi Family Residential \$6,000 x # Units

Multi Family Residential 1 Bed / 1 Bath \$2,000 x # units

3 ppl/unit x 80 gal/ppl/day = 240 gallons per residence per day

240 gal/res/day x \$25 per gallon = \$6,000.00 per residence

Numbers pulled from MO DNR design standards for water usage

Standard Water Connection \$2,210

Standard Sewer Connection \$2,979

Total Water & Sewer = \$5,189

Connection charges and impact fees added together for total charge for standard sizes.

Current Impact Fees

	Water	Sewer	Combined Total Impact
3/4" Meter	\$2,284.00	\$2,284.00	\$4,568.00
1" Meter	\$3,748.00	\$3,748.00	\$7,496.00
1.5" Meter	\$7,899.00	\$7,899.00	\$15,798.00
2" Meter	\$12,002.00	\$12,002.00	\$24,004.00
3" Meter	\$26,185.00	\$26,185.00	\$52,370.00
4" Meter	\$75,014.00	\$75,014.00	\$150,028.00
6" Meter	\$149,232.00	\$149,232.00	\$298,464.00
8" Meter	\$237,006.00	\$237,006.00	\$474,012.00

Multi Family Residential \$1,223.00 x # Units



CAMDEN COUNTY PUBLIC WATER SUPPLY DISTRICT #4

P.O. BOX 9, 62 BITTERSWEET ROAD, LAKE OZARK, MO 65049

P: 573-365-6792 F: 573-365-6793

www.camdenpwsd4.com

To Whom it Concerns,

Camden County Public Water District #4 has reviewed and analyzed the cost of building infrastructure i.e. wastewater treatment, wastewater lift stations, drinking water wells, drinking water booster stations and drinking water storage. In performing this analysis, it has been found that current impact fees which are a part of the cost generally known as "connection charges" does not match that of true cost for expansion of above-mentioned infrastructure as demand on those systems increases with the growth and expansion of our systems.

Impact fees are a crucial dynamic of the connection fee schedule as the District collects these fees for future allocation of the above-mentioned infrastructure projects as needed with growth. As new connections are paid for these connections are essentially buying into the system for their portion of capacity in infrastructure they will be consuming.

The District normally prepares these increases in November and approves them at the beginning of the new year. To circulate this information the District has put together this notification along with the impact fee schedule on the back of this letter. Impact fees are not the whole amount of fees paid, as the true connection side which pays for material, labor and equipment is added to the impact fees for the total. Connection fees for material, labor and equipment listed on the schedule are for standard size 3/4 inch meter installation. Installation of meters larger than the standard 3/4 inch size are charged the impact fee associated with the requested meter size plus time and material per section 2 subpart A of the Districts rules and regulations. Fee amounts listed on the schedule are representative at this time and not final.

Questions regarding these increases can be directed to General Manager for the District Anthony Butt at 573-365-6792 or email at abutt@camdenpwsd4.com

Thank You,

Camden County PWSD #4
General Manager