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Public Comment on CP report, 5-22-2018


1 message

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Tue, May 22, 2018 at 10:00 AM

To: edc.cob@edcgov.us

Please correct bad data in CP's report

 CCE05222018_0004.pdf
1225K

May 22, 2018

El Dorado County Board of Supervisors
330 Fair Lane
Placerville, Ca 95667

Re File 18-0769 Cameron Park Fire Nexus Study public comment

The proposed nexus fee study for the Cameron Park Community Services District is based on fictitious growth projections. A growth projection is based mathematical calculations derived from historical data within the district. This assumes there is an adequate supply of land available for development. Establishing a trend line based on historical data is the most accurate data in forecasting growth. Generally, the most recent historical data is the most important in forecasting. With this in consideration the field of statistics allows the most recent data to be weighted more heavily than older data. Recent permit information is readily available is more accurate and reflective of the actual growth trend in the district. We use the latest county supplied historical permit data.

Attached is the permit history for the district and surrounding areas with growth rates included at the lower right corner of the spatial maps compiled by EL Dorado County Surveyor's office. The growth rates and permit histories on the maps is derived from the latest census data submitted by the county to the Census Department.

The projected annual growth within the district is derived using simple math. The existing inventory times the annual growth rate equals the number of new units constructed in a year. The number of annual residential units forecast using the nexus study's 1.22% growth is as follows. 7,794 units (existing units) times 1.22% equals 95 new units per year on average. However, in comparison with actual permits within the district the forecast is inaccurate and overstated. Both the 15 year average and 5 year annual average dramatically conflict with the consultant's forecast.

Attached are the actual permit histories spatially located on the county's maps. The historical permit data shows that from 2011 to 2015 the annual permit average for the area was 12 permits per year. Even adding all permits from Bass Lake Rd to Placerville (includes the Diamond Springs/El Dorado fire service area) the five year permit average was only 15 permits per year. The nexus study's growth rate is overstated by about 800%. This overstatement skews the need for mitigation of impacts to the CSD.

The CSD's nexus projection of 95 units per year exceeds the entire average annual growth of the entire west slope excluding the El Dorado Hills service area (2011-2015). We believe the fee is therefore NOT justified by the nexus report. The needs for mitigation are overstated violating the essential nexus requirement of the Mitigation Fee Act. This letter constitutes a notice our group will sue the county and CSD unless corrections are made to the nexus study.

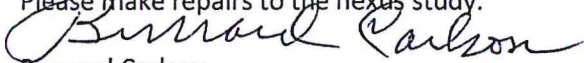
The nexus study relates – Page 8 “ Figure 3 below calculates the Department's existing demand EDUs based on the total number of dwelling units and estimated nonresidential building area within the Department's service area. As shown,

total existing demand EDUs for the Department is 7,794. Existing demand EDUs represents the level of existing development served by the Department's existing facilities."

Page 13 - "Figure 8 projects fire impact fee revenue through 2035 based on household and employment projections for the District provided by the Sacramento Area Council of Governments ("SACOG") and the District. Based on annual growth rates for the Cameron Park-Shingle Springs Regional Analysis District, residential demand assumes an annual growth rate of 1.22% while nonresidential demand EDU growth is based an annual growth rate of 1.73%."

Further, using replacement cost to evaluate the existing inventory of assets is an attempt to fund existing deficiencies. Using replacement cost to value assets does not consider depreciation and dilapidation of assets. A fully depreciated ladder truck with a blown engine can be ascribed the value of a new ladder truck and charged to new residents through the calculation process. A fully depreciated asset should be considered as an existing deficiency. An appraisal of assets would insure that new residents don't fund existing users deficiencies. Replacement cost allows existing development an overstatement in asset values ascribed to their "fair share". This nexus study allows for new to fund existing deficiencies – a violation of government code 66001(g).

Please make repairs to the nexus study.


Bernard Carlson

Friends of El Dorado County