

EL DORADO COUNTY FIRE PROTECTION DISTRICT

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April 26, 2021

Chief Administrative Office 330 Fair Lane Placerville, CA 95667

Dear Ms. Hennike,

On April 14, 2021 the El Dorado County Fire Protection District Board of Directors passed Resolution 2021-01 — Fire Impact Fee Nexus Study. The intent of this letter is to request this Study be brought to the El Dorado County Board of Supervisors for adoption and approval. I have included a copy of the signed resolution and Nexus Study.

Regards,

Tim Cordero Fire Chief

RESOLUTION 2021-01 OF THE BOARD OF DIRECTORS OF THE EL DORADO COUNTY FIRE PROTECTION DISTRICT APRIL 14, 2021

RESOLUTION APPROVING THE EL DORADO COUNTY FIRE PROTECTION DISTRICT FIRE IMPACT FEE NEXUS STUDY AND REQUESTING THE COUNTY OF EL DORADO BOARD OF SUPERVISORS ADOPT AND IMPLEMENT THE PROPOSED FIRE IMPACT ACT FEE PROGRAM ON BEHALF OF THE DISTRICT

WHEREAS, AB 1600 was adopted and codified in California Government Code Section 66000 allowing the establishing, increasing or imposing of a development fee as a condition of approval where the purpose and use of the fee were identified and reasonable relationship to the development project was demonstrated; and

WHEREAS, the Board of Supervisors of the County of El Dorado, by Ordinance Number 5057, amended Chapter 13, Section 20 of the El Dorado County Code authorizing the imposition of development impact mitigation fees ("Impact Fees") on behalf of a Special District within El Dorado County in order to fund facilities, apparatus, and equipment necessary to mitigate the impacts caused by new development; and

WHEREAS, the El Dorado County Fire Protection District (District") Board of Directors ("Board") has received and considered the Fire Development Impact Fee Justification Study prepared by DTA dated October 23, 2020 ("Nexus Study") that provides the required information to establish a new Fire Impact Fee program.

NOW, THEREFORE, IT IS HEREBY RESOLVED that:

- 1. The Board hereby receives and approves the Nexus Study dated April 2, 2021, prepared by DTA.
- 2. Prior to the adoption of this Resolution, the Board conducted a public hearing at which oral and written presentations were made, as part of the Board's regularly scheduled April 14, 2021 meeting. Notice of the time and place of the meeting, including a general explanation of the matter to be considered, has been published twice in a newspaper in accordance with Government Code sections 66004, 66018, and 6062, subdivision (a). Additionally, at least 10 days prior to the meeting, the District made available to the public data indicating the amount of the cost, or estimated cost, required to provide the service for which the fee or service charge is to be adjusted pursuant to the Resolution by way of such public meeting, the Board received the Study attached as Exhibit A, which formed the basis for the action taken pursuant to this Resolution.
- 3. After considering the Nexus Study, this Resolution, and after considering the testimony received at this public hearing, the Board, hereby makes the following findings:
 - a. The Fire Impact Fee program and Fire Impact Fees proposed in the Nexus Study and approved pursuant to this Resolution are for the purposes of funding the cost of fire protection and emergency response facilities, apparatus, and equipment attributable to new residential and nonresidential development in the District; and

- The Fire Impact Fees proposed in the Nexus Study and approved pursuant to this Resolution will be used to expand the District's fire facilities, apparatus, and equipment to serve new development; and
- c. The uses of the Fire Impact Fees proposed in the Nexus Study and approved pursuant to this Resolution are reasonably related to the types of development projects on which the fees are imposed in that fee revenue from the development projects will be used to expand the District's facilities, apparatus, and equipment to meet the additional demand generated by the new residents and employees and new structural area created by the development projects; and
- d. The Fire Impact Fees proposed in the Nexus Study and approved pursuant to this Resolution bear a reasonable relationship to the need for fire protection and emergency response facilities, apparatus, and equipment in that each development project will create additional need for the District's fire protection and emergency response services and a corresponding need for expanded facilities, apparatus, and equipment. The fee will be imposed on different types of development projects in proportion to the additional service population generated and structural area created by new development projects; and
- e. The Nexus Study demonstrates that there is a reasonable relationship between the amount of the Fire Impact Fee and the cost of the fire protection facilities, apparatus, and equipment attributable to the development on which the fee is imposed in that the costs are based upon the level of existing development served by the District's existing fire protection facilities and applied proportionately to eight land use categories in proportion to the need they create for expanded fire facilities, apparatus, and equipment.
- 4. The Board finds pursuant to the California Environmental Quality Act ("CEQA"), this action is not a "project" because the Resolution provides a mechanism for funding fire protection and emergency response facilities, apparatus, and equipment but does not involve a commitment to any specific project for such purposes that may result in a potentially significant impact on the environment. (CEQA Guidelines§ 15378.)

5. The Board does hereby approve the following Fire Impact Fees on new development, which shall be charged upon issuance of a building permit:

Fire Impact Fees

B 11 11 B 1	
Residential Development	Per Living Area Sq. Ft.
Residential Single Family	\$1.03
Residential Multi-Family	\$1.49
Residential Mobile Home	\$1.08
Nonresidential Development	Per Building Sq. Ft.
Retail / Commercial	\$0.87
Office	\$1.19
Industrial	\$0.83
Agriculture	\$0.53
Warehouse / Distribution	\$0.69

Land Use Category

- 6. The Board does hereby approve an annual inflationary adjustment of the Fire Impact Fees by an amount equal to the annual change in the Building Cost Index average for San Francisco and Los Angeles as produced by the Engineering News-Record.
- 7. If any portion of this Resolution is found by a court of competent jurisdiction to be invalid, such finding shall not affect the validity of the remaining portions of this Resolution.

BE IT FURTHER RESOLVED that the Board of Directors of the El Dorado County Fire Protection District formally requests that the El Dorado County Board of Supervisors adopt and implement this approved Fire Impact Fees program on behalf of the District.

PASSED AND ADOPTED by the Board of Directors of the El Dorado County Fire Protection District, at a regularly scheduled meeting held on the 14th of April, Two-thousand and Twenty-One, by the following vote of said Board:

April 14, 2021

AYES: Swarbrick Brunton, Darper, Gilchrest

ABSTAIN: Kaisem

ABSENT: Wone

NOES: MONE

11/1/

Chair

Board of Directors

ATTEST:

Secretary

Board of Directors

El Dorado County Fire Protection District Resolution 2021-01

Attachment A

Fire Development Impact Fee Justification Study



FIRE DEVELOPMENT IMPACT FEE JUSTIFICATION STUDY

EL DORADO COUNTY FIRE PROTECTION DISTRICT

Report Date: April 2, 2021

Public Finance Public-Private Partnerships Development Economics Clean Energy Bonds



EL DORADO COUNTY FIRE PROTECTION DISTRICT



FIRE DEVELOPMENT IMPACT FEE JUSTIFICATION STUDY

Prepared for:

El Dorado County Fire Protection District 4040 Carson Road Camino, CA 95709

Attention: Tim Cordero, Fire Chief

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I EXECUTIVE SUMMARY

In order to adequately plan for new development and identify the public facilities and costs associated with mitigating the direct and cumulative impacts of new development, DTA (formerly David Taussig and Associates, Inc.) was retained by the El Dorado County Fire Protection District ("the District") to prepare an Assembly Bill ("AB") 1600 fee justification study (the "Fee Study") for fire protection improvements. This Fee Study is intended to comply with Section 66000 et seq. of the Government Code, which was enacted by the State of California in 1987, by identifying additional public facilities required by new residential and non-residential development ("Future Facilities") and determining the level of fees that may be imposed to pay the costs of the Future Facilities. A description of the methodology used to calculate the fees is included in Section V. The purpose of this Fee Study is to ensure that all new development is required to pay its "fair share" of the cost of new infrastructure through the development fee program.

A Organization of the Report

This Fee Study is presented in the following six (6) sections:

- Section I contains an Executive Summary and provides a brief introduction to the Fee Study and an overview of the proposed fees.
- Section II of this Fee Study introduces the study, including a brief description of the District's surroundings and background information on development fee financing.
- Section III provides an overview of the legal requirements for implementing and imposing the fee amounts identified in the Fee Study. Included in this section is a discussion of the findings required under the Mitigation Fee Act and requirements necessary to satisfy nexus when establishing, increasing, or imposing a fee as a condition of new development.
- Section IV includes a discussion of land use characteristics on existing development and demand variables, such as population, the number of housing units, and non-residential building square feet.
- Section V contains the description of the methodology used to determine the fees, including generating the replacement value of the existing fire facilities and presenting the calculations of the Development Impact Fees ("DIFs") for each land use type.
- Section VI presents a summary of the proposed fees.



This Fee Study also includes appendices that discuss the calculations and fire facilities inventory used to determine the findings presented in this Fee Study, as noted below.

- Appendix A includes the calculations used to determine the various fee levels; and
- Appendix B includes an inventory of the existing fire facilities and equipment to be replaced.

B DIF Fee Summary

The total fee amounts required to finance new residential and non-residential development's share of the costs of facilities are summarized in Table 1 below. Importantly, the fees calculated in this study are development impact fees, not user fees. The purpose of a development impact fee is to ensure that all new development is required to pay its "fair share" of the cost of any new infrastructure that will be necessary to serve new development, such as new or expanded fire stations or additional fire engines or other major equipment. User fees, on the other hand, are direct charges for services and are based on the true costs of providing services, such as salaries, benefits, supplies, and utilities. All of the Fees presented within this Fee Study reflect the maximum DIF levels that may be imposed on new residential and non-residential development.

Land Use Category Fee Single Family \$1.03 Multi-Family \$1.49 Mobile Homes \$1.08 Retail/Commercial \$0.87 Office \$1.19 Industrial \$0.83 Agriculture \$0.53 Warehouse/Distribution \$0.69

Table 1: DIF Summary (per Square Foot)

The following recommendations are based on the Findings of this Fee Study:

- The District may establish the proposed Fees outlined in Table 1 above to allocate the costs of providing fire protection facilities, apparatus, and equipment to new development.
- The District's proposed DIFs should be adopted and implemented in accordance with the applicable provisions of the Mitigation Fee Act (Government Code 66000 et seq.).
- Only Cities and Counties have the authority to impose fees as a condition of project approval, therefore the District's proposed Fees must be adopted by the El Dorado County Board of Supervisors and the City of Placerville on behalf of the District.

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- The District's DIF program should be administered in accordance with Government Code 660066 and other applicable provisions of the Mitigation Fee Act and the County Code Chapter 13.20.
- The Cost Estimates in this Fee Study are in 2021 dollars. The ordinance and/or resolution establishing the new DIF fees should include a provision for an annual inflationary adjustment based upon the Building Cost Index ("BCI") average for San Francisco and Los Angeles as produced by Engineering News-Record ("ENR").

C Exemptions

California Government Code permits fee exemptions for affordable housing and other product types at the discretion of local jurisdictions. Such fee exemptions are a policy matter that should be based on the consideration of the greater public good provided by the given use exempted from the fee.



II INTRODUCTION

The District is approximately 281 square miles and serves the City of Placerville (the "City") and unincorporated communities of Apple Hill, Camino, Coloma, Cool, Gold Hill, Kyburz, Lotus, Oak Hill, Pacific House, Pilot Hill, Placerville, Pleasant Valley, Pollock Pines, Salmon Falls, Shingle Springs, Sierra Springs, Silver Fork, Strawberry, Texas Hill, and Twin Bridges. The District begins in the lower foothills near Salmon Falls at an altitude of 500 feet and ends well into the Sierras at Twin Bridges, with an elevation of nearly 6,000 feet. It is located along US Highway 50 between Sacramento and South Lake Tahoe, California. Lying on the western slope of the Sierra Nevada mountain range, the District is comprised of grassy hills, brushy valleys, and heavy timber. The District provides fire prevention and suppression, emergency and non-emergency services, including medical response and transport, rescue services, and hazardous materials response.

In order to adequately plan for new development and identify the public facilities and costs associated with mitigating the direct and cumulative impacts of new development, DTA was retained by the District to prepare an AB 1600 fee justification study (the "Fee Study") for specific categories of public improvements. The impact fees in this Fee Study are calculated using updated information on District facilities and residential and non-residential development.

Moreover, the methods used to calculate impact fees in this Fee Study are intended to satisfy all legal requirements governing such fees, including provisions of the U.S. Constitution, California Constitution, and California Mitigation Fee Act (Government Code Section 66000 et seq.).

More specifically, the Fee Study is intended to comply with Section 66000 *et seq.* of the Government Code, which was enacted by the State of California in 1987, by identifying additional public facilities required by new development ("Future Facilities") and determining the level of fees that may be imposed to pay the costs of the Future Facilities. Fee amounts have been determined that will finance facilities at levels identified by the District as deemed necessary to meet the needs of new development.

The Future Facilities and associated construction costs are identified in Section V of the Fee Study. All new development may be required to pay its "fair share" of the cost of new infrastructure through the development fee program. Fees are calculated to fund the cost of facilities needed to meet the needs of new development. The steps followed in the Fee Study include:

- 1. **Demographic Assumptions**: Identify future growth that represents the increased demand for facilities;
- 2. Facility Needs and Costs: Determine the public facilities required to support new development and the costs of such facilities;
- 3. Cost Allocation: Allocate costs per Equivalent Dwelling Unit ("EDU"); and
- 4. Fee Schedule: Calculate the residential and non-residential fee per square foot.

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III LEGAL REQUIREMENTS TO JUSTIFY DEVELOPMENT IMPACT FEES

The levy of impact fees is one authorized method of financing the public facilities necessary to mitigate the impacts of new development. A fee is "a monetary exaction, other than a tax or special assessment, which is charged by a local agency to the applicant in connection with approval of a development project for the purpose of defraying all or a portion of the cost of public facilities related to the development project."

A fee may be levied for each type of capital improvement required for new development, with the payment of the fee typically occurring prior to the beginning of construction of a dwelling unit or non-residential building. Fees are often levied at final map recordation, upon the issuance of a Certificate of Occupancy, or more commonly, at building permit issuance.

AB 1600, which created Section 66000 *et seq.* of the Government Code, was enacted by the State of California in 1987.

In 2006, Government Code Section 66001 was amended to clarify that a fee cannot include costs attributable to existing deficiencies, but it can fund costs used to maintain the existing Level of Service ("LOS") or meet an adopted LOS consistent with the General Plan.

Section 66000 *et seq.* of the Government Code thus requires that all public agencies satisfy the following requirements when establishing, increasing, or imposing a fee as a condition of new development:

- 1. Identify the purpose of the fee [Government Code Section 66001(a)(1)];
- 2. Ascertain the use to which the fee will be put. [Government Code Section 66001(a)(2)];
- 3. Determine that there is a reasonable relationship between the fee's use and type of development on which the fee is to be imposed [Government Code Section 66001(a)(3)];
- 4. Establish how there is a reasonable relationship between the need for the public facility and type of development project on which the fee is to be imposed [Government Code Section 66001(a)(4)]; and
- 5. Discuss how there is a reasonable relationship between the amount of the fee and cost of the public facility or portion of the public facility attributable to the development on which the fee is imposed.

This section presents each of these items as they relate to the imposition of the proposed fees in the District.

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¹ California Government Code Section 66000.



A PURPOSE OF THE FEE [GOVERNMENT CODE SECTION 66001(A)(1)]

New residential and non-residential development within the District will generate additional residents and employees who will require additional public facilities. Land for these facilities will have to be acquired, if necessary, and public facilities and equipment will have to be expanded, constructed, or purchased to meet this increased demand.

The Fee Study has been prepared in response to the projected direct and cumulative effects of future development. Each new development will contribute to the need for new public facilities. Without future development, many of the new public facilities would not be necessary as the existing facilities are generally adequate for the District's present population. In instances where facilities would be built regardless of new development, the costs of such facilities have been allocated to new and existing development based on their respective level of benefit.

The proposed impact fee will be charged to all future development, irrespective of location, in the District. First, the property owners and/or tenants associated with any new development in the District can be expected to place additional demands on the District's facilities funded by the fee. Second, these property owners and tenants are dependent on and, in fact, may not have chosen to utilize their development, except for residential, retail, employment, and recreational opportunities located nearby on other existing and future development sites. As a result, all development projects in the District contribute to the cumulative impacts of development.

The impact fees will be used for the acquisition, installation, and construction of public facilities identified on the list of facilities to mitigate the direct and cumulative impacts of new development in the District.

B THE USE TO WHICH THE FEE IS TO BE PUT [GOVERNMENT CODE SECTION 66001(A)(2)]

The fee will be used for the acquisition, installation, and construction of the public facilities included in Section V of the Fee Study and other appropriate costs to mitigate the direct and cumulative impacts of new development in the District. The fee will provide a source of revenue to the District to allow for the acquisition, installation, and construction of public facilities, which in turn will both preserve the quality of life in the District and protect the health, safety, and welfare of the existing and future residents and employees.

The discussion presented in this section of the Fee Study identifies the use to which the fee is to be put as required by Section 66001(a)(2) of the California Government Code.

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C THERE IS A REASONABLE RELATIONSHIP BETWEEN THE FEE'S USE AND TYPE OF DEVELOPMENT PROJECT UPON WHICH THE FEE IS IMPOSED (BENEFIT RELATIONSHIP) [GOVERNMENT CODE SECTION 66001(A)(3)]

As discussed in Section A above, it is the projected direct and cumulative effects of future development that have prompted the preparation of the Fee Study. Each development will contribute to the need for new public facilities. Without future development, the District would have no need to construct many of the public facilities. For all other facilities, the costs have been allocated to both existing and new development based on their level of benefit. Consequently, all new development within the District, irrespective of location, contributes to the direct and cumulative impacts of development on public facilities and creates the need for new facilities to accommodate growth.

The fees will be expended for the acquisition, installation, and construction of the public facilities identified and other authorized uses, as that is the purpose for which the fees are collected. As previously stated, all new development creates either a direct impact on public facilities or contributes to the cumulative impact on public facilities. Moreover, this impact is generally equalized among all types of development because the increased demands for public facilities created by the future residents and employees create the impact upon existing facilities.

For the aforementioned reasons, new development benefits from the acquisition, construction, and installation of the facilities.

D THERE IS A REASONABLE RELATIONSHIP BETWEEN THE NEED FOR THE PUBLIC FACILITY AND TYPE OF DEVELOPMENT PROJECT UPON WHICH THE FEE IS IMPOSED (IMPACT RELATIONSHIP) [GOVERNMENT CODE SECTION 66001(A)(4)]

As previously stated, all new development within the District, irrespective of location, contributes to the direct and cumulative impacts of development on public facilities and creates the need for new facilities to accommodate growth. Without future development, many of the facilities would not be necessary.

For the reasons presented herein, there is a reasonable relationship between the need for the public facilities and all new development within the District.

E THERE IS A REASONABLE RELATIONSHIP BETWEEN THE AMOUNT OF THE FEE AND COST OF THE PUBLIC FACILITIES ATTRIBUTABLE TO THE DEVELOPMENT UPON WHICH THE FEE IS IMPOSED ("ROUGH PROPORTIONALITY" RELATIONSHIP) [GOVERNMENT CODE 66001(A)]

As set forth above, all new development in the District impacts public facilities. Moreover, each individual development project and its related increase in population and/or employment, along with the cumulative impacts of all development in the District, will adversely impact existing facilities. Thus, the imposition of the fee to finance the facilities to be replaced is an efficient, practical, and equitable method of permitting development to proceed in a responsible manner.

El Dorado County Fire Protection District Fire Development Impact Fee Justification Study April 2, 2021



New development impacts facilities directly and cumulatively. In fact, without any future development, the acquisition, construction, and/or installation of many of the facilities on the list of facilities would not be necessary as existing District facilities are generally adequate. Even new development located adjacent to existing facilities will utilize and benefit from facilities on that list.

The proposed fee amounts are roughly proportional to the impacts resulting from new development based on the analyses contained in Section V. Thus, there is a reasonable relationship between the amount of the fee and cost of the facilities.



IV DEMOGRAPHICS

In order to determine the District facilities needed to serve new development, as well as establish fee amounts to fund such facilities, DTA categorized development as residential and non-residential land uses. Developable residential land uses are categorized as Single Family, Multi-Family, and Mobile Homes. Developable non-residential land uses within the District are categorized as Retail/Commercial, Office, Industrial, Agricultural, and Warehouse/Distribution. Additional details on these land use classifications are included in Table 2 below.

Table 2: Summary of Land Use Categories

	Table 2. Summary of Land Ose Categories
Land Use Classification Fee Study	Definition
Single Family	Includes single family detached homes and single family attached homes.
Multi-Family	Includes buildings with attached residential units, including apartments, townhomes, condominiums, and all other residential units not classified as single family. For the purposes of determining the impact fees due, any "second unit" or "accessory dwelling unit" (as determined pursuant to Section 65852.2 of the Government Code) shall be considered a separate residential unit and be subject to this fine.
Mobile Homes	Mobile homes and trailer homes.
Retail/Commercial	Includes but is not limited to buildings used as the following: Retail; Service-oriented business activities; Wineries/vineyards; Carwashes; Department stores, discount stores, furniture/appliance outlets, and home improvement centers; Subregional and regional shopping centers; and Entertainment centers.
Office	General, professional/business, and office construction.
Industrial	Includes but is not limited to buildings used as the following: Light manufacturing, warehouse/distribution, and logistics wholesaling; Food processing; Wholesale and warehouse retail; and Support for commercial services.
Agriculture	Construction of barns and other agricultural structures.
Warehouse/Distribution	Buildings primarily devoted to the storage and/or distribution of goods and materials.



Based on these designations, DTA established fees for the eight (8) land use categories detailed above to acknowledge the difference in impacts resulting from various land uses and make the resulting fee program implementable.

Future residents and employees create additional demand for facilities that existing public facilities cannot adequately service. In order to accommodate new development in an orderly manner while maintaining the current quality of life in the District, the replacement of the District's existing fire facilities, which can be found in Section V, will need to be constructed.

A Estimated Existing Residential Development

Demographic data provided by the Nielsen Company, a leading information, measurement, and data analytics company, was used to estimate the existing number of housing units and population in the District. These figures are generally confirmed by the California Department of Finance and U.S. Census Bureau. Notably, DTA attempted to utilize metrics (e.g., average household size) that standardized existing demographics with DTA's projections.

Table 3 below summarizes the existing demographics for the District's residential land uses. There are currently 59,466 residents living in 25,842 residential housing units. The single family resident per unit factor of 2.39 was provided by the Nielsen Company and the factors of 2.08 and 1.50 persons per household for multi-family and mobile homes, respectively, were determined by DTA using population data provided by the State of California and Nielsen Company.

Land Use	Existing Population	Existing Housing Units	Persons per Unit
Single Family	52,461	21,950	2.39
Multi-Family	4,190	2,015	2.08
Mobile Homes	2,816	1,877	1.50
Total	59,466	25,842	N/A

Table 3: Estimated Existing Residential Development

B Estimated Existing Non-Residential Development

In terms of the District's non-residential development, there are estimated to be approximately 8 million square feet of existing Retail/Commercial development, 3.7 million square feet of existing Office space, 5.4 million square feet of Industrial development, 4.7 million square feet of Agricultural development, and 2.8 million square feet of Warehouse/Distribution development. In addition, there are 16,923 employees in the District, with the majority in the Retail/Commercial, Office, and Industrial sectors. This information was calculated using the CoStar Real Estate Software Platform, a leading real estate database, information, and analytics service, along with additional public information sources such as the U.S. Bureau of Labor Statistics North American Industry Classification System ("NAICS") database provided by the



Nielsen Company. As indicated in **Table 4** below, there are over 24.5 million square feet of non-residential development in the District.

Table 4: Estimated Existing Non-Residential Development

Land Use	Existing Employees	Existing Building Sq. Ft.	Employees per 1,000 Sq. Ft. ¹
Retail/Commercial	6,365	8,021,770	0.79
Office	5,530	3,689,462	1.50
Industrial	3,771	5,393,661	0.70
Agriculture	163	4,666,849	0.03
Warehouse/Distribution	1,094	2,798,456	0.39
Total	16,923	24,570,198	N/A

Note:

^{1.} The number of employees per 1,000 sq. ft. was determined by using information provided by the CoStar Real Estate Software Platform, a leading real estate database, information, and analytics service and Nielsen Company's NAICS Database services.



V METHODOLOGY USED FOR CALCULATING IMPACT FEES

Pursuant to the nexus requirements of Government Code Section 66000, a local agency is required to "determine how there is a reasonable relationship between the amount of the fee and the cost of the public facility or portion of the public facility attributable to the development on which the fee is imposed." It is impossible to precisely determine the impact that a specific new residential unit, retail/commercial, office, industrial, agriculture, or warehouse/distribution development will have on existing facilities. Predicting specific behavioral patterns for future persons served is extremely difficult and would involve numerous assumptions that are subject to substantial variances. Recognizing these limitations, the State Legislature drafted AB 1600 to specifically require that a "reasonable" relationship be determined, rather than a direct cause and effect relationship.

There are many methods of calculating fees, but they are all based on determining the cost of needed improvements and assigning those costs equitably to various types of development. In determining a reasonable nexus for each of public facility in this Fee Study, there are a number of acceptable methodologies available. DTA has utilized the Standards-Based Fee Methodology in this Fee Study. This methodology employs the concept of Equivalent Dwelling Units (EDUs) to allocate benefit among each of the eight (8) land use classes.

A EDU Calculations

The calculation of proposed development impact fees is based on equivalent dwelling unit ("EDU") factors, which reflect the number of residents or employees ("Persons Served") generated by each land class. To determine the relative demand for fire facilities among the eight (8) land uses, this Fee Study relies on EDU factors to compare fire facilities across both residential and non-residential land uses.

The EDU for each land use category is presented in **Table** 5 below. Per the District's request to maintain continuity, DTA used the same Level of Service (LOS) Standards-Based Methodology that was used in the 2015 Fire Impact Fee Study prepared by SCI Consulting. This methodology uses the EDU for each land use to calculate a fire facilities EDU Demand Factor ("Demand Factor"). The calculations to derive the Demand Factor from the EDUs are presented in detail in Appendix A.

To calculate the relative demand for fire facilities for the eight (8) land uses, this Fee Study relies on EDU factors to compare fire facilities demand across various residential and non-residential land uses. For consistency with the methodology used in the 2015 SCI Fee Study, it is assumed that 50% of the demand for fire protection and emergency response services are related to residents and employees and 50% is for the protection of the structural area (living area or non-residential building area where persons live or work.) EDUs are used to calculate rates for non-residential development in terms of equivalency to a residential dwelling unit, which allows for costs to be fairly apportioned among residential and non-residential land uses. For example, using this method, one single family home creates the



demand for the District's Fire facilities, apparatus, and equipment equal to 400 square feet of retail/commercial building area and 550 square feet of office building area and so on.

Structural **Fire** Persons Persons Structural Structural Persons per Area **Facilities** Land Use Category Unit/Employees per Unit Area per Demand Area per Demand Demand per 1,000 SF **EDU** Unit (SF) **Unit EDU** Factor Factor Factor b = c = e = d/2100f = e * 50%Calculations d q = c + fa a/2.39 b*50% 1.00 Single-Family Housing 2.39 1.00 0.50 2,100 0.50 1.00 Multi-Family Housing 2.08 0.87 0.44 960 0.46 0.23 0.66 Mobile Home Dwellings 1.50 0.63 0.31 1,192 0.57 0.28 0.60 Retail/Commercial 0.79 0.33 0.17 1,000 0.48 0.24 0.40 Office 1.50 0.63 0.31 1,000 0.48 0.24 0.55 Industrial 0.70 0.29 0.15 1.000 0.48 0.24 0.38 Agriculture 0.03 0.01 0.01 1,000 0.48 0.24 0.25 Warehouse/Distribution 0.08 1,000 0.39 0.16 0.48 0.24 0.32

Table 5: EDUs

Notes:

1. Average living area sq. ft. for single family, multi-family, and mobile homes is based on a representative inventory of properties in Placerville and surrounding communities, calculating the average square feet per unit for each land use.

0.14

1,000

0.48

0.24

0.38

0.29

2. The EDU factor of .38 is the blended total for the five (5) non -residential land uses.

0.69

3. Figures may not sum due to rounding.

Total

Table 5 above shows the calculation of the fire facilities demand factor for the eight (8) land use categories in this fee study. Residential land use categories are expressed per square foot of living unit area and non-residential land use is expressed per square foot of building area. Table 6 below summarizes the District's total demand EDUs based on the existing number of dwelling units and non-residential square footage within the District. The calculations for this table are presented in detail in Appendix A.

Land Use Category	Housing Units and 1,000 SF of Non-Residential	Fire Facilities EDU Demand Factor	Total Demand EDUs
Single Family	21,950	1.00	21,950
Multi-Family	2,015	0.66	1,337
Mobile Homes	1,877	0.60	1,122
Non-Residential ¹	24,570	0.38	9,390
Total	50,412	N/A	33,799

Table 6: Existing Fire Facilities Demand EDUs

Note:

 Non-residential Square footage numbers include combined Retail/Commercial, Office, Industrial, Agriculture, and Warehouse/Distribution totals.

April 2, 2021

In order to calculate the District's existing fire facilities standard, total demand EDUs have been calculated. The existing EDU calculation is based on the total number of dwelling units and non-residential square feet within the District. As shown in **Table 6** on the previous page, the total current existing demand EDUs for the District is 33,799. This total represents the existing level of development served by the District's existing facilities (buildings, vehicles, and apparatus) and is used to calculate the existing fire facility cost per EDU presented later in this section.

B Calculation of Fire Impact Fees

To calculate the existing fire facilities standard, the replacement values of the District's existing fire facilities must be determined. The District's fire facilities are shown in Table 7 below and include buildings such as fire stations, various types of vehicles and fire engines, apparatus, and equipment. Although the District has no current plans to acquire land, this category is included in the table to provide context as to the type of facilities that are included in this Fee Study. The replacement costs for buildings, apparatus, and equipment used in this Fee Study were provided by the District, and adjustments were made to the replacement costs based on the current operational status of the station. For example, the replacement cost of a station that is currently closed but is still fully operational was reduced to 80% of estimated replacement cost, and the estimated replacement cost of a station that is open but operational for day use only was reduced to 25% of the total estimated replacement cost. As shown below, after making adjustments to the total replacement costs based on the operational status of stations, the total replacement value for the District's fire facilities is estimated to be \$70,259,073. A detailed inventory of the included facilities is presented in detail in Appendix B.

Fee Components	Total Replacement Value
Land	\$0
Buildings	\$57,011,500
Apparatus/Vehicles	\$11,375,500
Equipment	\$1,872,073
Total Fire Facilities	\$70,259,073

Table 7: Replacement Value of Existing District Fire Facilities

To calculate the replacement value of the existing fire system, the existing fire facility cost per EDU is determined. As shown in **Table 8** on the following page, the existing fire facilities cost per EDU is calculated by taking the total replacement value of \$70,259,073 divided by the total EDUs of 33,799, resulting in a total of \$2,079 per EDU. This cost per EDU standard is applied in the calculation of both residential and non-residential fees.

Table 8: Fire Facilities Cost per EDU Calculation

Existing Fire Systems	Existing Demand	Existing Fire Facility Cost
Facilities	EDUs	Per EDU
\$70,259,073	33,799	\$2,079

C Residential Impact Fees

The proposed residential impact fees are presented in **Table 9**. The fee for a single family housing unit is calculated by multiplying the facilities demand EDU Factor of 1.00 by the cost per EDU of \$2,079. This results in a single family residence cost per unit of \$2,079. In this analysis, an administrative factor of 4%, totaling \$99.66, is added to the impact fee. The cost of implementing the DIFs is not included in the fees themselves and must be determined by the District. Specific implementation costs typically include the staff time involved in applying fee revenues to specific projects, maintaining the accounting records for each of the fee accounts, preparing the required annual accounts, Five-Year Report requirements, addressing periodic Nexus Study updates, completing the required documentation, updating the fees, preparing forms and information handouts, and other associated costs.

Table 9: Proposed Residential Impact Fees¹

Land Use	Facilities Demand EDU Factor	Cost per EDU	Cost per Unit	Admin Expense (4%)	Average Living Area SF	Fee per Sq. Ft.
Single Family	1.00	\$2,079	\$2,079	\$83	2,100	\$1.03
Multi-Family	0.66	\$2,079	\$1,379	\$55	960	\$1.49
Mobile Homes	0.60	\$2,079	\$1,242	\$50	1,192	\$1.08

Note:

1. Numbers may not sum due to rounding.

Once the administrative expense of \$83.15 is added to the single family cost per unit of \$2,079, the total (\$2,162) is divided by the average square feet for a single family residence. In this case, an average single family residence is approximately 2,100 square feet, generating a fee of \$1.03 per square foot. Multi-family and mobile home impact fees are calculated using the same methodology and generate a fee of \$1.49 and \$1.08 per square foot, respectively.

D Non-Residential Impact Fees

The non-residential impact fees are calculated in the same manner that residential impact fees are calculated. As illustrated in **Table 10** on the following page, the fee per square foot for the **Retail/Commercial** land use is calculated by multiplying the facilities demand EDU Factor of 0.40 by the cost per EDU of \$2,079. The result is a **Retail/Commercial** cost per unit of \$840. With the addition of the \$33.60 administrative expense, the cost per demand EDU totals \$874. Dividing that number by 1,000 (the per unit size used in the non-residential calculation) generates a fee of \$0.87 per square foot. The same methodology is used to calculate the fees for each of the other non-residential land uses.

El Dorado County Fire Protection District Fire Development Impact Fee Justification Study April 2, 2021



Table 10: Proposed Non-Residential Impact Fees¹

Land Use	Facilities Demand EDU Factor	Cost per EDU	Cost per Unit	Admin Expense (4%)	Cost Per Demand EDU	Fee per Sq. Ft.
Retail/Commercial	0.40	\$2,079	\$840	\$33.60	\$874	\$0.87
Office	0.55	\$2,079	\$1,147	\$45.87	\$1,193	\$1.19
Industrial	0.38	\$2,079	\$799	\$31.96	\$831	\$0.83
Agriculture	0.25	\$2,079	\$510	\$20.40	\$531	\$0.53
Warehouse/Distribution	0.32	\$2,079	\$665	\$26.60	\$692	\$0.69

Note:

1. Numbers may not sum due to rounding.

The calculation of proposed fees based on existing EDUs by land use type, rather than simply applying one fee to all land use types, provides a thorough demonstration that a reasonable relationship or nexus exists between new development that occurs within the District and the need for fire protection facilities, apparatus, and equipment as a result of new development, as required by AB 1600, Section 66000 et seq. of the Government Code. Additionally, as outlined in Table 11 on the following page, the updated fees are also now generally more in line with the fees of surrounding jurisdictions, providing some level of consistency among development within the broader geographic area.

DTA further recommends that, after adoption, the fee schedule should be reviewed each year and adjusted by the Consumer Cost Index ("CCI"). CCI is based upon the Building Cost Index ("BCI") average for San Francisco and Los Angeles as produced by Engineering News-Record ("ENR").



Table 11: Development Impact Fees for Surrounding Jurisdictions

Jurisdiction (Development Impact Fees per Square Foot)									
Building Type	El Dorado Fire Protection District (Current)	El Dorado Fire Protection District (Proposed)	Diamond Springs El Dorado Fire Protection District	Garden Valley Fire Protection District	Georgetown Fire Protection District	Lake Valley Fire Protection District	Pioneer Fire Protection District	Rescue Fire Protection District	Cameron Park Community Services District - Fire Department
Residential Single Family	\$1.10	\$1.03	\$1.07	\$1.43	\$1.11	\$0.98	\$1.20	\$1.26	\$0.54
Residential Multi Family	\$1.10	\$1.49	\$1.51	\$1.69	\$1.75	\$1.32	\$1.66	\$2.26	\$0.91
Residential Mobile Home	\$1.10	\$1.08	\$1.44	\$1.51	\$1.51	\$1.23	\$1.62	\$1.89	\$0.80
Retail/Commercial	\$1.10	\$0.87	\$1.47	\$1.89	\$1.44	\$1.40	\$1.56	\$1.96	\$0.78
Office	\$1.10	\$1.19	\$1.79	\$2.29	\$1.75	\$1.72	\$1.90	\$2.44	\$0.96
Industrial	\$1.10	\$0.83	\$1.36	\$1.74	\$1.34	\$1.30	\$1.46	\$1.82	\$0.72
Agriculture	\$1.10	\$0.53	\$0.65	\$0.87	\$0.67	\$0.61	\$0.72	\$0.80	\$0.33
Warehouse / Distribution	\$1.10	\$0.69	\$0.98	\$1.27	\$0.98	\$0.93	\$1.06	\$1.27	\$0.52

Source: Fiscal Year 2019-2020 County of El Dorado Special Districts Consolidated Annual Report of Revenues and Expenditures [Mitigation Fee Act Cal. Gov. code 66006 (b)(b1)].



VI SUMMARY OF FEES

The total fee amounts required to finance new residential and non-residential development's "fair share" of the costs of facilities are summarized in **Table 12** below. Please see **Appendix A** for additional detail regarding the LOS and cost calculations of each fee category.

Table 12: DIF Summary (Per Square Foot)

Land Use Category	Fee
Single Family	\$1.03
Multi-Family	\$1.49
Mobile Homes	\$1.08
Retail/Commercial	\$0.87
Office	\$1.19
Industrial	\$0.83
Agriculture	\$0.53
Warehouse/Distribution	\$0.69

APPENDIX A

El Dorado County Fire Protection District Draft Fire Development Impact Fee Justification Study



Fire Impact Fee Calculations

Land Use Category	Persons per Unit / Employees per 1,000 SF	Persons per Unit EDU	Persons Demand Factor	Structural Area per Unit (SF)	Structural Area per Unit EDU	Structural Area Demand Factor	Fire Facilities Demand Factor
Calculations	a	b = a / 2.39	c = b*50%	d	e = d / 2100	f = e * 50%	g = c + f
Single-Family Housing	2,39	1.00	0.50	2,100	1.00	0.50	1.00
Multi-Family Housing	2.08	0.87	0.44	960	0.46	0.23	0,66
Mobile Home Dwellings	1.50	0,63	0.31	1,192	0.57	0.28	0.60
Retail / Commercial	0.79	0.33	0.17	1.000	0,48	0.24	0,40
Office	1.50	0.63	0.31	1,000	0.48	0.24	0.55
Industrial	0.70	0,29	0.15	1,000	0.48	0.24	0.38
Agriculture	0.03	0.01	0.01	1,000	0.48	0.24	0.25
Warehouse / Distribution	0,39	0.16	0.08	1,000	0.48	0.24	0.32
Total	0.69	0.29	0.14	1.000	0.48	0.24	0.38

Existing Fire Facilties Demand EDU's

Land Use Category	Housing Units and 1,000 SF of Non- residential	EDU Demand Factor	Total Demand EDUs
Single-Family Housing	21,950	1.00	21,950
Multi-Family Housing	2.015	0.66	1,337
Mobile Horne Dwellings	1.877	0,60	1.122
Non-Rresidential	24,570	0,38	9,390
Total	50,412		33,799

Replacement Value of Existing Fire system

Fee Components	Total Replacement Value
Land	\$0
Buildings	\$57,011,500
Apparatus/Vehicles	\$11,375,500
Equipment	\$1,872,073
Total Fire System Facilities	\$70,259,073

Fire Facilties Standard Cost per EDU Calculation

Easting Fire Systems Facilities	Existing Demand EDUs	Existing Fire Facility Cost Per EDU
\$70,259,073	\$33,799	\$2,079

Fire Facilties Standard	
Existing Fire Systems Facilties	\$70,259,073
Existing Demand EDUs	33,799
Existing Fire Facility Cost Per I	\$2,078.72

Proposed Residential Fire Impact Fees

Land Use	Facilities Demand EDU Factor	Cost per EDU	Cost per Unit	Admin Expense 4%	Average Living Area SF	Fee per Sq. Ft.
Single-Family Housing	1.00	\$2,079	\$2,079	\$83.15	2,100	\$1.03
Multi-Family Housing	0.66	\$2,079	\$1,379	\$55.18	960	\$1.49
Mobile Home Dwellings	0.60	\$2,079	\$1,242	\$49.69	1,192	\$1.08

Proposed Non-Residential Fire Impact Fees

Land Use	Facilities Demand EDU Factor	Cost per EDU	Cost per Unit	Admin Expense 4%	Cost Per Demand EDU	Fee per Sq. Ft.
Retail / Commercial	0.40	\$2,079	\$840	\$33.60	\$874	\$0.87
Office	0,55	\$2,079	\$1,147	\$45.87	\$1,193	\$1.19
Industrial	0.38	\$2,079	\$799	\$31.96	\$831	\$0.83
Agriculture	0.25	\$2,079	\$510	\$20.40	\$531	\$0.53
Warehouse / Distribution	0.32	\$2,079	\$665	\$26.60	\$692	\$0.69

APPENDIX B

El Dorado County Fire Protection District Draft Fire Development Impact Fee Justification Study

FIRE FACILITIES REPLACEMENT COSTS

El Dorado County Fire District - Station Inventory

Station	Adjusted Estimated Cost of Replacing Building (In Dollars)
Existing Stations:	
Station 15 (16211 Strawberry Lane, Twin Bridges)	\$606,000
Station 16 (13275 Highway 50, Kyburz)	\$3,025,000
Station 17 (6430 Pony Express Trail, Pollock Pines)	\$5,500,000
Station 18 (5785 Sly Park Road, Placerville)	\$606,000
Station 19 (4429 Pleasant Valley Road, Placerville)	\$5,500,000
Station 21 (4040 Carson Road, Camino)	\$5,500,000
Station 23 (1834 Pleasant Valley Road, Placerville)	\$2,424,000
Station 24 (3370 Texas Hill Road, Placerville)	\$0
Station 25 (3034 Sacramento St., Placerville)	\$13,750,000
Station 26 (730 Main St., Placerville)	\$272,500
Station 27 (6051 Gold Hill Road, Placerville)	\$3,025,000
Station 28 (3860 Ponderosa Road, Shingle Springs)	\$5,500,000
Station 72 (7200 St. Florian Court, Cool)	\$5,500,000
Station 73 (4302 State Hwy 49, Pilot Hill)	\$303,000
Station 74 (5122 Firehouse Road, Coloma)	\$5,500,000
Total	\$57,011,500

El Dorado County Fire District - Vehicle Inventory

Fire Station	Vehicle Type	Estimated Replacement Cost	
Station 17	Engine	\$700,000	
	Engine	\$500,000	
	Snow Plow	\$50,000	
	Trailer	\$4,000	
	Other	\$25,000	
Station 19	Engine	\$700,000	
	Engine	\$700,000	
	Engine	\$500,000	
	Other	\$50,000	
Station 21	Engine	\$700,000	
Station 21	Engine	\$250,000	
	Water Tender	\$350,000	
	Command Vehicle	\$65,000	
	Other	\$20,000	
	Other	\$45,000	
	Other	\$65,000	
	Other	\$65,000	
Station 23	Other	\$45,000	
	Trailer	\$45,000	
Station 26	Engine	\$700,000	
Station 20	Specialized Vehicle	\$1,500,000	
	Specialized verticle	\$1,500,000	
station 25	Engine	\$700,000	
	Other	\$65,000	
Station 28	Engine	\$700,000	
	Engine	\$500,000	
	Water Tender	\$350,000	
	Other	\$65,000	
	Specialized Vehicle	\$25,000	
	Trailer	\$0	

Fire Station	Vehicle Type	Estimated Replacement Cost
Station 72	Engine	\$700,000
	Engine	\$500,000
	Other	\$65,000
	Specialized Vehicle	\$12,000
	Trailer	\$4,500
Station 74	Other	\$0
	Specialized Vehicle	\$150,000
	Other	\$5,000
St 73,27,18,16,15	Other	\$0
	Total	\$11,375,500

El Dorado County Fire District - Equipment Inventory

Fire Station	Equipment Type	Quantity	Replacement Cost per Unit	Total Cost
Other	Beds	38	\$300.00	\$11,400.00
	Refrigerators	17	\$2,000.00	\$34,000.00
	Stoves	13	\$1,000.00	\$13,000.00
	Washers	9	\$1,100.00	\$9,900.00
	Dryers	9	\$900.00	\$8,100.00
	Recliners	28	\$550.00	\$15,400.00
	Air compressor	10	\$3,400.00	\$34,000.00
	Ice machine	9	\$1,800.00	\$16,200.00
	Extractors	3	\$9,800.00	\$29,400.00
	Desk phones	30	\$280,00	\$8,400.00
	Managed Desktops	16	\$1,500.00	\$24,000.00
	Managed Laptops	8	\$2,000.00	\$16,000.00
	Unmanaged laptops	2	\$1,500.00	\$3,000.00
	App Servers	2	\$1,000.00	\$2,000.00
	Servers	2	\$15,000.00	\$30,000.00
	Desk top printers	5	\$500.00	\$2,500.00
	Misc. IT Equipment	1	\$20,000.00	\$20,000.00
	2 tool 11 aquipment	<u> </u>	920,000.00	\$20,000.00
Station 15	Nothing to report			\$0,00
	The state of the s			40.00
Station 16	Nothing to report			\$0.00
Station 16	Leased to USFS			\$0.00

Station 17	Plymovent	1	\$90,000.00	\$90,000.00
1011 27	Generator	1	\$12,000.00	\$12,000.00
	Radio equipment system	1	\$10,000.00	\$10,000.00
	Engine bay lockers	16	\$366.00	\$5,856.00
tation 17	Extrication Equipment	3	\$12,000.00	\$36,000.00
tation 17		50		\$10,000.00
	Replacment hose		\$200.00	
	SCBA	8	\$900.00	\$7,200.00
	Misc tools	10	\$75.00	\$750.00
	Chain saw	1	\$1,000.00	\$1,000.00
tation 18	Mathine to you are			\$0.00
tation 18	Nothing to report	_		\$0.00
tation 18	No equipment			
h-11 10	Discourse		000,000,00	\$0.00
tation 19	Plymovent	1	\$90,000.00	\$90,000.00
	Generator	1	\$12,000.00	\$12,000.00
	Radio equipment	1	\$10,000.00	\$10,000.00
	Engine bay lockers	14	\$366.00	\$5,124.00
tation 19	Extrication equipment	3	\$12,000.00	\$36,000.00
	Replacment hose	50	\$200.00	\$10,000.00
	SCBA	8	\$900.00	\$7,200.00
	Misc tools	10	\$75.00	\$750.00
tation 21	Dhanasant		600,000,00	\$00,000,00
tation 21	Plymovent	1	\$90,000.00	\$90,000.00
	Generator	1	\$12,000.00	\$12,000.00
	Radio equipment	1	\$10,000.00	\$10,000.00
	Engine bay lockers	12	\$366.00	\$4,392.00
ation 21	Replacment hose	50	\$200.00	\$10,000.00
- Vii	SCBA	6	\$900.00	\$5,400.00
	Misc tools	10	\$75.00	\$750.00
	Chain saw	1	\$1,000.00	\$1,000.00

Fire Station	Equipment Type	Quantity	Replacement Cost per Unit	Total Cost
Station 23	Plymovent	1	\$90,000.00	\$90,000.00
	Generator	1	\$12,000.00	\$12,000.00
	Radio equipment	1	\$10,000.00	\$10,000.00
	Engine bay lockers	14	\$366.00	\$5,124.00
	SCBA Air compressor	1	\$120,000.00	\$120,000.00
Station 23	Replacment hose	25	\$200.00	\$5,000.00
	SCBA compressor system	1	\$120,000.00	\$120,000.00
	Spare SCBA bottles	20	\$900.00	\$18,000.00
	Misc tools	25	\$75.00	\$1,875.00
	Chain saw	11	\$1,000.00	\$1,000.00
	Supply warehouse	1	\$150,000.00	\$150,000.00
tation 24	Plymovent	1	\$90,000.00	\$90,000.00
	Generator	1	\$12,000.00	\$12,000.00
	Radio equipment	1	\$10,000.00	\$10,000.00
	Engine bay lockers	20	\$366.00	\$7,320.00
tation 24	Replacment hose	50	\$200.00	\$10,000.00
	Misc tools	10	\$75.00	\$750,00
tation 26	Extication equipment	3	\$12,000.00	\$36,000.00
tation 27	Nothing to report			\$0.00
tation 27	Leased to BLM			\$0.00
Station 28	Plymovent	1	\$90,000.00	\$90,000.00
A STATE OF S	Generator	1	\$12,000.00	\$12,000.00
	Radio equipment	1	\$10,000.00	\$10,000.00
	Engine bay lockers	24	\$366.00	\$8,784.00
tation 28	Replacment hose	50	\$200,00	\$10,000.00
	Misc tools	10	\$75.00	\$750.00
	Chain saw	1	\$1,000.00	\$1,000.00
tation 72	Plymovent	1	\$90,000.00	\$90,000.00
	Generator	1	\$12,000.00	\$12,000.00
	Radio equipment	1	\$10,000.00	\$10,000.00
	Engine bay lockers	14	\$366.00	\$5,124.00
	SCBA Air compressor	1	\$120,000.00	\$120,000.00
ation 72	Replacment hose	50	\$200.00	\$10,000.00
	Misc tools	10	\$75.00	\$750.00
ation 73	Nothing to report			\$0.00
ation 73	Leased to private party			\$0.00
ation 74	Generator	1	\$12,000.00	\$12,000.00
was stated	Radio equipment	1	\$10,000.00	\$10,000.00
	Engine bay lockers	14	\$366.00	\$5,124.00
ation 74	replacment hose	50	\$200.00	\$10,000.00
WHOIL / T	Misc tools	10	\$75.00	\$750.00
	1	+	Total	\$1,872,073

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