

Public Comment #3d  
BOS Recd. 11-27-24

**From:** David Williamson <Dave@frifs.com>  
**Sent:** Wednesday, November 27, 2024 3:51 PM  
**To:** BOS-Clerk of the Board  
**Cc:** 'Debbie Manning'  
**Subject:** FW: CALL TO ACTION

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El Dorado County Board of Supervisors,

I support the attached request that the hearing date for the 2024 Major TIF Update be postponed until after the new board members have taken office. This is especially important with the recent passing of Supervisor Hydahl.

Best Regards,

Dave



The finest compliment you can give to us is an introduction to someone you care about.

David A. Williamson MBA, LUTCF, CLTC  
Tax Deferral Consultant  
Foothills Regional Insurance & Financial Solutions  
*Serving Individuals, Families, and Businesses, alike*  
Office: (916) 358-5799 Cell: (916) 220-1973

\*\*\* Schedule a Meeting \*\*\*

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**From:** El Dorado Hills Chamber of Commerce <chamber-eldoradohillschamber.org@shared1.ccsend.com>  
**Sent:** Wednesday, November 27, 2024 10:38 AM  
**To:** David Williamson <Dave@frifs.com>  
**Subject:** CALL TO ACTION

# CALL TO ACTION

On October 22, 2024, Department of Transportation recommended the Board consider a Major Update of the Traffic Impact Fee (TIF) Program and Capital Improvement Program (CIP). The Board voted, 4-1, including but not limited to: Direct Staff to return on December 3, 2024, with the appropriate resolution for the adoption of the Major Update to the Traffic Impact Fee Program, and to incorporate the changes to the Capital Improvement Program with the 2025 Annual Update.

We have signed on to a letter that was sent to the Board of Supervisors last Friday, along with many of our neighboring organizations asking for a continuance of this item for several reasons, one of the most significant, with the unfortunate passing of District 1 County Supervisor John Hidahl, District 1 is currently without representation. Also, Zone C (District 1) bears most of the highest increases.

If you agree that this Major Update should be continued, please email the Clerk of the Board your concern by **EOB, Monday, December 2.**

**[Edc.cob@edcgov.us](mailto:Edc.cob@edcgov.us)**

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November 22, 2024

**El Dorado County Board of Supervisors**

330 Fair Lane

Placerville, CA 95667

Dear Chair Thomas and Members of the El Dorado County Board of Supervisors,

On behalf of the seven organizations signed on to this letter, we respectfully request that the hearing date for the 2024 Major TIF Update be postponed until after the new board members have taken office. We appreciate the significant amount of work that has gone into developing

the update and the concerns staff have raised regarding the future of funding availability for transportation infrastructure. However, we are concerned not only about the significant fee increases and the lack of transparency but also about the issue of equal representation.

The Board of Supervisors and staff have already heard from some of our organizations regarding our issues with the update. First, residential and non-residential projects face fee increases of such magnitude that they are likely to halt future development. Charging fees so large that they

make opening a new business or providing homes for middle- and low-income families infeasible would have a lasting negative economic impact on the county. Second, the process by which this update has been handled has severely lacked transparency for those who will ultimately be charged the fee. Making the nexus study on major updates available only two weeks before the board hearing—during a period that includes a major holiday—creates an environment where stakeholders feel blindsided and deliberately excluded.

Finally, we wish to express our concerns in the most respectful manner possible about the lack of representation if this update is adopted on December 3rd. Zone C within the TIF program, covering the area of El Dorado Hills, will be most heavily impacted by this fee update.

Residential development will see fee increases of 80%, while non-residential fees will increase by anywhere from 58% to 146%. Following the sudden passing of Supervisor Hidahl, El Dorado Hills is without elected representation. This is especially concerning at a time when these massive fee increases jeopardize the economic vitality of the community.

For these reasons, we, the undersigned, are calling on the Board of Supervisors to grant stakeholders more time to analyze the 2024 Major TIF Update and postpone the hearing until after the new Supervisors take office. Doing so will provide a fair and reasonable opportunity for El Dorado Hills to be properly represented when the county's economic future is determined.

We thank you for your consideration of this request and look forward to working with you and your staff on this and all other matters that make doing business in El Dorado County possible.

Sincerely,



Timothy Murphy,

President & CEO, North State Building Industry Association



Laurel Brent-Bumb,

Chief Executive Officer, El Dorado County Chamber of Commerce



Debbie Manning,

President & CEO, El Dorado Hills Chamber of Commerce



Kimberly Beal,

Government Affairs Director, El Dorado County Association of Realtors





Cristi Creegan,  
CEO, Tahoe Chamber of Commerce



Duane Wallace,  
CEO & ACE, South Tahoe Chamber of Commerce



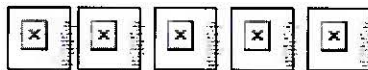
Dylan Hastings, 2024-2025 President  
South Tahoe Association of REALTORS®

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El Dorado Hills Chamber of Commerce  
Home of the California Welcome Center  
(916) 933-1335

[www.eldoradohillschamber.org](http://www.eldoradohillschamber.org)

2085 Vine Street, Ste. 105  
El Dorado Hills, CA 95762



El Dorado Hills Chamber of Commerce | 2085 Vine Street Suite 105 | El Dorado Hills,  
CA 95762 US

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**From:** Vance Jarrard <Vance@northstatebia.org>  
**Sent:** Wednesday, November 27, 2024 4:28 PM  
**To:** BOS-District IV; BOS-District II; BOS-District III; BOS-District V  
**Cc:** BOS-Clerk of the Board; Rafael Martinez  
**Subject:** 12-3-24 BOS Agenda Item 34: BIA Comment - TIF Nexus Study Evaluation  
**Attachments:** NSBIA DFA Evaluation TIF Update.pdf; 2024 TIF Update Coalition Letter.pdf

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Good afternoon, all, and happy Thanksgiving,

Please find attached from the BIA a letter and draft evaluation of the 2024 TIF Update Nexus Study. Unfortunately, our evaluation, though limited in time to conduct, found numerous issues that need to be addressed before the update moves forward.

I have also included the coalition letter sent to all Supervisors last week, which includes the signatures of seven organizations all asking for a delay in the item being heard.

Enjoy your holiday and see you next Tuesday.

Best,



**Vance Jarrard, MPA**  
Government & Public Affairs Advocate  
North State Building Industry Association  
c: 530 321 7376  
w: [northstatebia.org](http://northstatebia.org)







**NORTH STATE  
BUILDING INDUSTRY  
ASSOCIATION**

November 27, 2024

El Dorado County Board of Supervisors  
Rafael Martinez, Director of El Dorado County Department of Transportation  
330 Fair Lane, Building A  
Placerville, CA 95667

Re: 2024 TIF Program Major Update

Dear Chair Thomas, Members of the El Dorado County Board of Supervisors, and Director Martinez,

Attached, please find a **draft** evaluation conducted by Development and Financial Advisory (DFA) of the County's Traffic Impact Fee (TIF) Update Nexus Study. It is important to emphasize that this analysis remains incomplete due to the limited time available for DFA and our members to fully review the final Nexus Study. Nevertheless, despite the constraints, DFA has identified several critical issues that merit serious attention from both the County and our industry. Key concerns include:

- **Dwelling Unit Calculations:** The calculation of dwelling units in Zones C and B inaccurately reflects the trajectory of future development and growth potential based on current zoning and land use. The study fails to recognize logical and established growth trends, leading to misleading projections.
- **Capital Improvement Program (CIP):** Projects listed in the CIP are allocated to Zones without sufficient details regarding their specific locations within the County or project nexus. This approach distorts the demand for funds beyond what is necessary and justified through nexus.
- **Legal Vulnerabilities:** The study introduces legal risks for the County, particularly by requiring residential development to subsidize non-residential projects' share of TIF funding.

These issues represent some of the most significant flaws in the County's Nexus Study. Additional details and analysis are provided in the attached evaluation. DFA's preliminary findings suggest that the study's methodology is flawed, creating an unjustified basis for the proposed fee increases and exposing the County to potential legal challenges.

Given the magnitude of these concerns, we strongly urge the Board of Supervisors to delay any decision on the proposed 2024 Major TIF Update. A more thorough review and necessary amendments must be completed to ensure the study incorporates accurate projections, sound calculations, and equitable allocations. Thank you for your consideration. We look forward to engaging further on this critical matter.

Sincerely,

*Vance Jarrard*

Vance Jarrard, Government & Public Affairs Advocate  
North State Building Industry Association

## Memorandum (Draft)

To: Vance Jarrard, North State BIA  
From: Development & Financial Advisory (DFA)  
CC:  
Date: 11/27/2024  
Re: Review of the El Dorado County Traffic Impact Fee Update dated 11/18/2024

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DFA was retained by The North State Building Industry Association (“BIA”) to prepare an evaluation of El Dorado County’s (“County”) Traffic Impact Fee Update (“Study”) dated November 18, 2024. The Study used a six-step approach to calculate traffic impact fees by: 1) updating existing development and forecasting future growth, 2) identifying facility standards and deficiencies per County policies, 3) identifying improvements needed to provide for vehicular trips generated by new development per County policies, 4) determining the cost of improvements required to serve new development, 5) identifying alternative funding requirements or cost offsets and, 6) calculating the fee schedule.

The County is proposing to increase the fee basis based on equivalent dwelling units (EDUs). The proposed fees reflect the funding to provide the proper level of service within the unincorporated West Slope of El Dorado County. The proposed fees generally are significant increases from the current fees. Note that 1 EDU is equivalent to a single-family residential unit that is between 2,000 and 2,999 square feet in size.

**Table 1. Proposed Fee per Land Use Category (Hwy 50 & Local Roads)**

EDU Factor	Fee Basis	Zone A	Zone B	Zone C
<b>Residential</b>				
	Cost per EDU >>	\$ 16,740	\$ 31,745	\$ 66,216
0.82	Dwelling Unit	\$ 13,726	\$ 26,031	\$ 54,297
0.89	Dwelling Unit	\$ 14,899	\$ 28,253	\$ 58,933
0.95	Dwelling Unit	\$ 15,902	\$ 30,158	\$ 62,906
1.00	Dwelling Unit	\$ 16,740	\$ 31,745	\$ 66,216
1.06	Dwelling Unit	\$ 17,744	\$ 33,649	\$ 70,190
1.10	Dwelling Unit	\$ 18,414	\$ 34,919	\$ 72,838
0.54	Dwelling Unit	\$ 9,040	\$ 17,142	\$ 35,757
0.32	Dwelling Unit	N/A	\$ 10,159	\$ 21,190
0.27	Dwelling Unit	N/A	\$ 8,571	\$ 17,878
<b>Nonresidential</b>				
	Cost per EDU >>	\$ 5,032	\$ 7,540	\$ 12,828
1.72	Bldg Sq Ft	\$ 8.65	\$ 12.96	\$ 22.07
0.28	Room	\$ 1,409	\$ 2,111	\$ 3,592
0.26	Bldg Sq Ft	\$ 1.31	\$ 1.96	\$ 3.34
1.99	Bldg Sq Ft	\$ 10.00	\$ 14.99	\$ 25.51
0.56	Bldg Sq Ft	\$ 2.82	\$ 4.22	\$ 7.19

**Table 2. Cost per EDU: Current vs. Proposed 2024**

<b>Residential: 2,000 to 2,999 SF = 1 EDU</b>			
	Zone A	Zone B	Zone C
<b>Original Zones:</b>	<b>1, 4, 5, 6, 7</b>	<b>2, 3</b>	<b>8</b>
Current Cost per EDU	\$ 12,331	\$ 31,297	\$ 36,781
2024 Cost per EDU	\$ 16,740	\$ 31,745	\$ 66,216
Change in \$	\$ 4,409	\$ 448	\$ 29,435
Change in %	36%	1%	80%
<b>Non-Residential</b>			
	Zone A	Zone B	Zone C
<b>Original Zones:</b>	<b>1, 4, 5, 6, 7</b>	<b>2, 3</b>	<b>8</b>
Current Cost per EDU	\$ 1,459	\$ 6,116	\$ 8,083
2024 Cost per EDU	\$ 5,032	\$ 7,540	\$ 12,828
Change in \$	\$ 3,573	\$ 1,424	\$ 4,745
Change in %	245%	23%	59%

**OVERVIEW OF FEE CALCULATIONS**

The 2024 Study projects an overall 14% decrease in total dwelling units. Zone C is projected to experience a 65% reduction in single-family residential (SFR) units and a 32% reduction in multifamily residential (MFR) units. These dwelling unit projections are utilized to calculate the number of Equivalent Dwelling Units (EDUs), which are derived using EDU factors from trip rates established by the Institute of Transportation Engineers (ITE).

**Table 3. Dwelling Unit Projections & EDU Factors**

	2020 EDU Factor	2020 Study: 2018-2040				2024 EDU Factor	2024 Study: 2023-2045			
		Zone A 1, 4, 5, 6, 7	Zone B 2, 3	Zone C 8	Total		Zone A	Zone B	Zone C	Total
<b>Residential</b>										
Single Family										
Not Restricted	1.00	551	2,244	4,911	7,706	1.00	520	3,129	1,526	5,175
Age Restricted	0.30	-	100	580	680	0.32	-	100	409	509
Subtotal		551	2,344	5,491	8,386		520	3,229	1,935	5,684
Multi-family										
Not Restricted	0.57	2	819	1	822	0.54	-	2,216	212	2,428
Age Restricted	0.26	-	300	312	612	0.27	-	300	-	300
Subtotal		2	1,119	313	1,434		-	2,516	212	2,728
<b>Total</b>		<b>553</b>	<b>3,463</b>	<b>5,804</b>	<b>9,820</b>		<b>520</b>	<b>5,745</b>	<b>2,147</b>	<b>8,412</b>
<b>Nonresidential</b>										
Commercial	1.55	101	448	195	744	1.72	36	751	537	1,324
Office	0.91	54	107	544	705	1.20	2	83	155	240
Medical	2.14	26	205	70	301	2.56	9	293	28	330
Industrial / Other	0.51	170	194	416	780	0.56	56	550	264	870
<b>Total</b>		<b>351</b>	<b>954</b>	<b>1,225</b>	<b>2,530</b>		<b>103</b>	<b>1,677</b>	<b>984</b>	<b>2,764</b>

The EDU factors shown in the table above are then used to calculate EDUs for each type of dwelling unit. The table below shows the results of these calculations. Impact fees shown in Table 1 were calculated using EDU factors and the cost per EDU.

**Table 4. Calculation of EDUs by Type of Dwelling**

Original Zones:	2020 Study: 2018-2040				2024 Study: 2023-2045			
	Zone A 1, 4, 5, 6, 7	Zone B 2, 3	Zone C 8	Total	Zone A	Zone B	Zone C	Total
<b>Residential</b>								
Single Family								
Not Restricted	551	2,244	4,911	7,706	520	3,129	1,526	5,175
Age Restricted	-	30	174	204	-	32	131	163
Multi-family								
Not Restricted	1	467	1	469	-	1,197	114	1,311
Age Restricted	-	78	81	159	-	81	-	81
Subtotal	<b>552</b>	<b>2,819</b>	<b>5,167</b>	<b>8,538</b>	<b>520</b>	<b>4,439</b>	<b>1,771</b>	<b>6,730</b>
<b>Nonresidential</b>								
Commercial	157	694	302	1,153	62	1,292	924	2,277
Office	49	97	495	642	2	100	186	288
Medical	56	439	150	644	23	750	72	845
Industrial / Other	87	99	212	398	31	308	148	487
Subtotal	<b>348</b>	<b>1,329</b>	<b>1,159</b>	<b>2,837</b>	<b>119</b>	<b>2,449</b>	<b>1,329</b>	<b>3,897</b>
<b>Total EDU, 2015-2035</b>	<b>900</b>	<b>4,148</b>	<b>6,326</b>	<b>11,374</b>	<b>639</b>	<b>6,888</b>	<b>3,101</b>	<b>10,627</b>



**Table 5. Calculation of the Cost per EDU**

Roadway Improvement	Zone A	Zone B	Zone C
Total	\$ 19,028,225	\$ 164,134,323	\$ 198,218,701
<b>Cost Allocation by Zone Adjusted for Fund Balances</b>			
Fund Balances (6/30/2024)	\$ (2,597,765)	\$ (24,002,313)	\$ (28,301,922)
Costs Net of Fund Balances	\$ 16,430,460	\$ 140,132,010	\$ 169,916,779
<b>Cost Allocation by Land Use Adjusted for Local-Serving Nonresidential</b>			
Residential:			
Initial	\$ 13,406,251	\$ 90,315,284	\$ 97,068,789
Local-Serving Nonresidential	\$ 5,919,749	\$ 50,570,085	\$ 20,175,601
Final (before offset)	\$ 19,326,000	\$ 140,885,369	\$ 117,244,390
Nonresidential:			
Initial	\$ 3,021,615	\$ 49,814,262	\$ 72,845,164
Local-Serving Nonresidential	\$ (1,843,185)	\$ (30,386,700)	\$ (44,435,550)
Final (before offset)	\$ 1,178,430	\$ 19,427,562	\$ 28,409,614
<b>Equivalent Dwelling Units</b>			
Residential	520	4,438	1,771
Nonresidential	117	2,448	1,329
	637	6,886	3,100
<b>Cost per EDU Adjusted for Offsets</b>			
Residential:			
Initial	\$ 37,165	\$ 31,745	\$ 66,202
Offset	55%	0%	0%
Final Cost per EDU	\$ 16,724	\$ 31,745	\$ 66,202
Nonresidential:			
Initial	\$ 10,072	\$ 7,936	\$ 21,377
Offset	50%	5%	40%
Final Cost per EDU	\$ 5,036	\$ 7,539	\$ 12,826

**PRELIMINARY CONCERNS**

Preliminary concerns are primarily from questionable unit counts, unsubstantiated reallocation of funds, and unidentified and deferral of capital improvements.

**A. Questionable Unit Count of Dwelling Types**

- 1. Reallocation of projected units from SFR to MFRs and from Zone C to Zone B.** Table 3 above indicates not only a reduction in the total unit count but also a reallocation of units from single-family residential (SFR) to multifamily residential (MFR) and a shift of units from Zone C to Zone B. Essentially, the County projects that Zone B will see more residential development than Zone C over the next 22 years. Notably, according to the Study, overall SFR unit production is expected to decline by 32%, while MFR unit production is projected to increase by 90%. However, the anticipated growth in multifamily units seems unlikely, as housing unit counts recorded by the California Department of Finance (DOF) show that single-family residential development in the County has historically and significantly exceeded multifamily residential development. These dwelling unit reallocations impact

the calculation of EDU, leading to a substantial reduction in EDUs for Zone C, resulting in higher traffic impact fees for Zone C.

**Table 6. Percent Change in Dwelling Unit Count  
(2020 vs. 2020)**

	% Change			Total
	Zone A	Zone B	Zone C	
<b>Residential</b>				
<i>(dwelling units)</i>				
Single Family				
Not Restricted				
Age Restricted				
Subtotal	-6%	38%	-65%	-32%
Multi-family				
Not Restricted				
Age Restricted				
Subtotal	-100%	125%	-32%	90%
<b>Total</b>	<b>-6%</b>	<b>66%</b>	<b>-63%</b>	<b>-14%</b>
<b>Nonresidential</b>				
<i>(1,000 sq ft)</i>				
Commercial	-64%	68%	175%	78%
Office	-96%	-22%	-72%	-66%
Medical	-65%	43%	-60%	10%
Industrial / Other	-67%	184%	-37%	12%
<b>Total</b>	<b>-71%</b>	<b>76%</b>	<b>-20%</b>	<b>9%</b>

- 2. Failure to account for General Plan buildout capacity.** The 2020 Study reported 54,739 single-family residential (SFR) units and 6,666 multifamily residential (MFR) units, for a total of 61,405 residential units. In comparison, the 2024 Study shows 59,498 SFR units and 7,017 MFR units, resulting in a total of 66,515 residential units. This reflects an overall average annual growth rate of about 1.66% in housing units, which is a significant drop compared to the proposed 0.62% average annual growth rate. Although it is acknowledged that housing units and population fluctuate due to various factors, the County may be overlooking full buildout capacity within the existing General Plan from flawed density or floor area ratio assumptions. It should be noted, the Study fails to provide sufficient information to determine the accuracy of the development projections. It is recommended that the County show the basis of its housing projections by dwelling unit type.

**B. Unsubstantiated Reallocation of Funds**

- 1. Reallocation of costs from nonresidential to residential land uses.** According to the fee calculation Step 3 in the Study, costs were adjusted by “re-allocating costs associated with travel demand from local serving non-residential growth, such as convenience stores and other local serving retail uses, estimated at 61-percent of total nonresidential growth (based on an analysis of existing employment, summarized in a memorandum provided as Appendix C), from nonresidential to residential land uses based on residential growth by zone as a share of total residential growth.” This reallocation of costs is illustrated in Table 10 of the Study, where \$76,665,435 in local-serving nonresidential costs were shifted away from the nonresidential category to the residential category. In addition, a review of the source document (Appendix C) prepared by EPS stated that the “County should contemplate whether to retain its current methodology of shifting all nonresidential EDUs to residential uses or

apply the percentage shift attributable to local-serving jobs to only those land uses housing local-serving jobs (retail commercial and office uses).”

**\*\*Discovery Items - Loans and Interfund Transfers.** It is important to note that our review requires examination of related documents and discovery, whether material or immaterial, may occur. Although not a part of this review and amounts are immaterial, loans and/or interfund transfers have been discovered in our examination of AB 1600 Annual Reports. These loans/interfund transfers are summarized below. Note Zone 8 is Zone C.

- The FY 2022-23 Annual AB 1600 Report shows a total of \$27,790 in loans/interfund transfers (deposit/transfer in: Zone C: \$18,256; TIF (Silva Valley Interchange): \$8,114; TIF Hwy 50: \$1,420).
- The FY 2010-11 Annual AB 1600 Report shows a total of \$1,405,601 in loans/interfund transfers (withdrawal/transfer out from Zone 8 (2004 GP EDH TIM) to Silva Valley Interchange Road Impact Fee).
- The FY 2008-09 Annual AB 1600 Report shows a total of \$750,000 in loans/interfund transfers (withdrawal/transfer out: Zone 8 (2004 GP EDH TIM Fee)).

Although the amounts discovered above are immaterial relative to the funds available for capital improvements, impact fees are collected exclusively to fund the specific capital improvement for which they are intended, with the payor's informed understanding of their purpose. There may be various reasons for these interfund transfers, such as deposit or accounting errors, but the exact purpose of these interfund transfers is unclear.

### C. Unidentified and Deferred Construction of Capital Improvements

1. **Unidentified capital improvements.** Both the 2020 and 2024 TIF updates lack sufficient detail to provide assurance against potential duplication of capital improvement costs. Descriptions are vague, and some physical locations are unspecified, casting doubt on their accuracy, validity, and compliance with AB 1600 nexus requirements. For instance, the locations of \$12,979,000 allocated for intersection and safety improvements remain unidentified but is embedded in the TIF (Table 6, Section 2 of the attachment to the 2024 Study). The 2020 Study also demonstrated lack of clarity, failing to specify the locations of intersection capital improvements totaling an even greater amount at \$37,480,000 (Table 7, Section 2 of the attachment to the 2020 Study), which represents 12% of the total capital improvements costs (total CIP net costs estimated in 2020: \$387,130,004). These unclarified locations are labeled as “To Be Determined” in both the 2020 and 2024 Studies.
2. **Deferred construction contributing to higher costs.** As reported in the County’s AB 1600 Annual Reports, the TIF program has collected \$35,081,087 in traffic impact fees prior to adjustments and \$27,744,338 after adjustments. These adjustments include accounting treatments, such as the reversal of accruals, refunds, interest earned, cash adjustments, and any loans or interfund transfers. Of the \$27,744,338 in net TIF collections between 2020 and 2024, only \$7,207,543 has been spent on capital improvements.

**Table 7. Total TIF Collections and Expenditures, Fiscal Years 2020 – 2024**

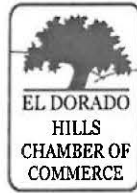
<b>FY 2020-24 Total</b>	<b>Zone A</b>	<b>Zone B</b>	<b>Zone C</b>	<b>TIF (TIM) Silva Valley Interchange</b>	<b>TIM - Zones 1-7 prior to 2/8/21)</b>	<b>TIF (TIM) Hwy 50</b>	<b>Total</b>
Fees Collected	\$ 1,291,086	\$ 3,694,275	\$ 12,802,317	\$ 9,182,553	\$ 364,962	\$ 7,745,894	\$ 35,081,087
Net Revenue	\$ 1,336,582	\$ 2,913,524	\$ 9,543,321	\$ 3,969,032	\$ 620,122	\$ 9,361,757	\$ 27,744,338
Expenditures	\$ -	\$ -	\$ 1,235,266	\$ 229,888	\$ 3,889,291	\$ 1,853,098	\$ 7,207,543

The 2024 Study indicates that TIF program costs were determined using a combination of recent bids for infrastructure projects and the Caltrans Construction Cost Index (CCCI). While the CCCI was utilized to update costs from the 2020 TIF Program Major Update, preference was given to bid data specific to El Dorado County. For items without corresponding bid data, a CCCI escalation rate of 38% was applied. Project delays may have increased project costs due to the need to keep pace with inflationary adjustments. While it is understood that construction delays can occur for various reasons, low expenditures compared to TIF collections highlight how delays contribute to costs that remain unspent for their intended purpose but require cost escalations to complete. A more detailed examination of capital improvement expenditures is necessary to identify deferred projects requiring inflationary adjustments.

DFA is available to discuss our concerns in greater detail.



**NORTH STATE  
BUILDING INDUSTRY  
ASSOCIATION**



**Strengthening  
CommYUnity**



*South Tahoe*  
CHAMBER OF  
COMMERCE

November 22, 2024

**El Dorado County Board of Supervisors**

330 Fair Lane  
Placerville, CA 95667

Dear Chair Thomas and Members of the El Dorado County Board of Supervisors,

On behalf of the seven organizations signed on to this letter, we respectfully request that the hearing date for the 2024 Major TIF Update be postponed until after the new board members have taken office. We appreciate the significant amount of work that has gone into developing the update and the concerns staff have raised regarding the future of funding availability for transportation infrastructure. However, we are concerned not only about the significant fee increases and the lack of transparency but also about the issue of equal representation.

The Board of Supervisors and staff have already heard from some of our organizations regarding our issues with the update. First, residential and non-residential projects face fee increases of such magnitude that they are likely to halt future development. Charging fees so large that they make opening a new business or providing homes for middle- and low-income families infeasible would have a lasting negative economic impact on the county. Second, the process by which this update has been handled has severely lacked transparency for those who will ultimately be charged the fee. Making the nexus study on major updates available only two weeks before the board hearing—during a period that includes a major holiday—creates an environment where stakeholders feel blindsided and deliberately excluded.

Finally, we wish to express our concerns in the most respectful manner possible about the lack of representation if this update is adopted on December 3rd. Zone C within the TIF program, covering the area of El Dorado Hills, will be most heavily impacted by this fee update. Residential development will see fee increases of 80%, while non-residential fees will increase by anywhere from 58% to 146%. Following the sudden passing of Supervisor Hidahl, El Dorado Hills is without elected representation. This is especially concerning at a time when these massive fee increases jeopardize the economic vitality of the community.



For these reasons, we, the undersigned, are calling on the Board of Supervisors to grant stakeholders more time to analyze the 2024 Major TIF Update and postpone the hearing until after the new Supervisors take office. Doing so will provide a fair and reasonable opportunity for El Dorado Hills to be properly represented when the county's economic future is determined.

We thank you for your consideration of this request and look forward to working with you and your staff on this and all other matters that make doing business in El Dorado County possible.

Sincerely,



Timothy Murphy,  
President & CEO, North State Building Industry Association



Laurel Brent-Bumb,  
Chief Executive Officer, El Dorado County Chamber of Commerce



Debbie Manning,  
President & CEO, El Dorado Hills Chamber of Commerce



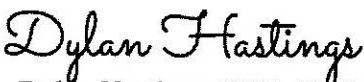
Kimberly Beal,  
Government Affairs Director, El Dorado County Association of Realtors



Cristi Creegan,  
CEO, Tahoe Chamber of Commerce



Duane Wallace,  
CEO & ACE, South Tahoe Chamber of Commerce



Dylan Hastings, 2024-2025 President  
South Tahoe Association of REALTORS®