May 21, 2018

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



The Diamond Springs Fire nexus study indicated the districts growth rate is .85% and is derived from census figures. This is inaccurate.

The .85% figure is dramatically overstated by over 200%. The overstatement affects the need for services. Attached are the county's building permit data for the area over a 15 year period. Please note the significant decline in permits for the last 12 years. Even if the permits from adjacent Pleasant Valley and Somerset areas were added to the growth int the Diamond Springs service area the growth rate would still be below the .85% rate.

Also, using a replacement cost to value dilapidated equipment is a violation of the Mitigation Fee Act in that a higher level of service is ascribed to the existing residents through the inflated value of the existing assets and equipment. Obviously, the benefactors of the new equipment are the existing residents.

Using replacement value must be based on the actual existing value of the asset - not a new asset. The depreciation must be considered in the accounting otherwise new residents should only be required to fund used equipment.

The study relates - "The District also protects approximately 6,066 occupied and vacant housing units and approximately 2.3 million square feet of nonresidential building area. Estimated total housing units and nonresidential building area are based on figures the El Dorado County Assessor as of July 2015." The occupied housing units mentioned here conflict with the table in appendix "A".

Using the consultants base figure we do the math 6,066 units X .0085 = 51.56 units per year. Using the conflicting data in Appendix "A" table the yearly growth in units is 37. Neither the census or county permit records support either of the permit tallies. Attached are 15 years of spatial census data compiled by the El Dorado County. The district can not use growth in another service area to shore up its growth rate. Even if the district included out of service area permits from Somerset, Pleasant Valley, Happy Valley and Camino they still fall short of 52 permits per year.

This is a notice to the county and district that we will sue the county if you approve the fee increases precipitous from this false information.

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Bernard Carlson Friends of El Dorado County

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