

## Roads

**Issue:** In Calaveras County, roads are the arteries of commerce, public service, community relations, and family life.

**Constraint:** The roads are increasingly congested and unsafe. In large part this is because the Board of Supervisors has historically refused to charge new development for the full cost of mitigating its road impacts. It is also because the 1996 General Plan made no effort to correlate its land use capacity with its roadway capacity.

**Opportunity:** The General Plan Update could correlate the County's land use capacity to its future roadway and alternative transportation network. Also, the General Plan Update could call for a Capital Improvement Plan and a nexus study to identify the development fee that fully mitigates the transportation impacts of new development.

objectives for reducing death rates due to unintentional injuries, lung cancer, cerebrovascular disease and prenatal care.

The following table highlights some of the health issues facing the County.

- Calaveras County had the 34<sup>th</sup> worst ranking among the 58 counties in the State of California in deaths from coronary disease.
- The County had the 38<sup>th</sup> worst ranking among the 58 counties in deaths from cerebrovascular disease.
- Calaveras County had the 5<sup>th</sup> best ranking among the counties in deaths from all cancers.
- During the 2002-2003 academic year, 26 percent of 7<sup>th</sup> grade students in the County were outside the normal body mass index (an indicator of obesity).
- Calaveras County had the 47<sup>th</sup> worst ranking out of the 58 counties in deaths due to unintentional injuries. Falls were the leading cause of hospitalization for nonfatal injuries.
- The County had the 55<sup>th</sup> worst ranking out of the State's counties in deaths due to motor vehicle crashes. The County had the 53<sup>rd</sup> worst ranking in alcohol involved fatal and injury motor vehicle crashes.
- Calaveras County had the 26<sup>th</sup> worst ranking out of the State's counties in deaths due to lung cancer.
- The County had the 44<sup>th</sup> worst ranking among the counties in drug-induced deaths.
- From 1999-2001, the juvenile alcohol and drug-related arrest rate per 1000 population 10 to 17 years of age was 19.2 for Calaveras County compared to 8.5 for California as a whole.

A Community Health Needs Assessment conducted by the Mark Twain St. Joseph's Hospital in 2004 identified some other health care issues. The Assessment concluded that while Calaveras County has a typically healthy community there are some areas of concern. These include a lack of specialist and specialized care, a lack of long-term care for seniors and a lack of women's care. Interviews have shown that there is a strong need for more OBGYNs. There is also a lack of long-term senior care when it comes to nursing homes, assisted living facilities and in-home health care. Cardiology, pulmonary and orthopedic services are needed by the 65 and older population. Another area of concern, especially in children ranging from pre-school to the sixth grade, is that of dental health. Challenges facing dental health include Medi-Cal and Medicare restrictions, difficulty in arranging for transportation to dental offices, and the lack of fluoride in many sources of domestic water supplies. First 5 Calaveras has recently funded a grant to address dental health in young children.

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**Date:** August 30, 2004

**To:** Board of Supervisors

**From:** Tim McSorley, Deputy Director *TJM*

**Subject:** Study Session – “State Highway 12/26 Triangle” Traffic and Circulation Issues

***ISSUE STATEMENT***

Development activity in the Valley Springs area continues at a high level. As a result, the following impacts on the road system in that area are considered significant and operating conditions continue to deteriorate:

- The State Route (SR) 12/26 intersection in Valley Springs is currently operating at Level of Service F (LOS F).
- To avoid that intersection, residents choose to use sub-standard County roads as an alternative to SR 12 and SR 26.
- Increased traffic along County roads intersecting the highways is creating significant intersection hazards for both County road and State highway users.
- No plan is currently in place to program improvements or provide funding that would address these issues. Without a comprehensive Mitigation Plan in place, proposed development cannot be approved with a Negative Declaration. Under the California Environmental Quality Act (CEQA), applicants will be required to prepare project-by-project Environmental Impact Reports (EIR) to identify impacts and fair share mitigation measures to the extent possible.

In recognition of these issues, this study session has been scheduled to solicit Board direction and to establish a process for developing an implementation plan that would accomplish the following:

- Identify improvements to address existing roadway deficiencies and mitigate traffic impacts from future development.
- Identify funding options.

## **BACKGROUND**

The area of the County bounded by State Routes 12 and 26 and extending to the County line has experienced and continues to attract a significant number of development proposals. The cumulative traffic impacts associated with ongoing development of these projects have exceeded the capacity of the road system in numerous areas and caused the roads to function at below acceptable levels. While these levels of operation have been declining over the last few years, because of the current growth, it has reached a point where the system can no longer absorb additional traffic without progressively decreasing service levels and potentially jeopardizing public safety.

A number of studies and reports have been prepared since 1996 that have identified the need to construct various improvements that would help to mitigate the impacts. These reports include:

- *Precise Plan Report dated February 1996 prepared by Caltrans.* This document reports on a variety of improvements along the 26 corridor from the San Joaquin County line to Valley Springs.
- *State Routes 12 and 26 Corridor Study by Fehr & Peers dated October 1998.* This study reported on improvements along both SR 12 and SR 26 from the San Joaquin County line to Valley Springs.
- *Valley Springs Circulation Alternatives Study dated August 1999.* This report discusses alternatives for routing traffic through and/or around Valley Springs via the Valley Springs Bypass.
- *Calaveras County Regional Transportation Plan (RTP) dated October 2001.* While this document is intended to address planning efforts Countywide, it does address issues specific to the Valley Springs area.
- *Caltrans Project Study Report (PSR) dated May 2003.* This PSR is for the Valley Springs Connector project. The PSR is a pre-requisite to program the project through the State Transportation Improvement Program (STIP). The project cannot be funded and consequently no environmental, design or right-of-way work can proceed until the Calaveras County Council of Governments submits the report to the California Transportation Commission (CTC) for programming. The Board approved the PSR in May 2003.
- *Calaveras County Code, with focus on Section 12.02 the Road Ordinance and Section 12.10 the Road Impact Mitigation (RIM) Fee Program Ordinance.*
- *Calaveras County 1996 General Plan last revision dated 1996.*

Unfortunately, although recognizing the problem, the studies did not include effective implementation measures to address the identified work needs.

## **EXISTING CONDITIONS**

At this time, the primary focus of these studies has been improvements to the State Highway 12/26 intersection, the State Highway 12/26 connector and access along State Highways 12 and 26 as described in the following paragraphs. However, other than the RTP, there is no comprehensive study of the existing deficiencies in the County road network.

**State Highway 12/26 Intersection.** This intersection currently operates at LOS F conditions during peak hours. This intersection has also been the subject of most of the previously referenced studies and documents.

- It is identified as an interim component of the Valley Springs Connector and is included in the RIM Program. The cost estimate included in the RIM Program is \$1.149 million. In the Valley Springs PSR, the cost estimate is \$1.3 million, including construction and right-of-way. It does not however, appear to include any engineering or environmental analyses. If we assume a 10% engineering cost and a 5% environmental cost with the PSR cost, the total could reach \$1.495 million. If we use the percentage of traffic allocated to new development pursuant to the RIM Program, the maximum amount that could be used from RIM would be \$339,365. This leaves a balance of \$1.155 million that would need to be financed from other sources.
- The 1996 General Plan identified the Concept LOS for this intersection to be LOS C. Implementation Measure III-4A-1 requires a traffic analysis to identify impacts and potential mitigation measures to maintain the Concept LOS. Implementation Measures III-4B-1, 2, 3, and 4 require the developer to mitigate the impacts.

**State Highway 12/26 Western Connector.** The Calaveras County Regional Transportation Plan (RTP) identifies Olive Orchard/Burson/Southworth/Pettinger Roads as serving as a connector between SR 26 in the Rancho Calaveras area and SR 12 in the Burson area. SR 12 serves as a main link to the employment centers both north and west of as well as outside of the County. This portion of the road network consists of sub-standard horizontal and vertical alignments and widths. Traffic counts indicate that the volume of traffic continues to increase during the a.m. and p.m. peak hours. While we believe this can be primarily attributed to the continued "build-out" of the Rancho Calaveras area, these roads are also under increasing pressures from new development as well as ongoing development of previously approved land divisions. In addition to volume increases, the County also receives numerous complaints about vehicle speed. The cost of upgrading this portion of the road system was estimated at \$3.3 million. However, that estimate addresses only the construction costs and was prepared in 2001. These roadways are not included in any fee program or Capital Improvement Plan (CIP) other than the RTP. There has been similar discussion of the need for an east/west connector along Warren Road but traffic counts do not indicate that it is a higher priority than Olive Orchard.

**Access Along State Route 26.** SR 26 serves as a major link between the County and the Stockton area. The traffic volumes are increasing due to continued development. While this development is occurring primarily in Valley Springs, is also occurring in other areas of the County. In addition, the County has approved mining operations for sand and gravel that is being exported to either the Stockton or Lodi area. The volumes of traffic reflect the ongoing pressure of development in the Central Valley and thus increase demands for the raw materials, which in turn create a disproportionate amount of truck traffic on local roads.

In many stretches, SR 26 has direct lot access in addition to County road connections. This pattern of access leads to a reduction of operational efficiency and also increases the potential for conflicts. Most of the local road connections do not have left-turn pockets to allow through-traffic to proceed and efficiently direct traffic to the secondary roads. The 1998 Fehr

& Peers report included recommendations for some of these improvements, but none of the improvements have been "costed out" or included in any CIP Program. One exception to this statement is the realignment of the intersection of Silver Rapids and SR 26. That project is currently under construction by a contract awarded by Caltrans as a safety project in their SHOPP program.

**Access Along State Route 12.** SR 12 suffers all of the same situations described above for SR 26, but to a lesser degree.

### ***ISSUE SUMMARY AND OPTIONS***

The traffic issues facing the County in this area can generally be categorized as follows:

- 1) Existing deficiencies resulting from properties already developed in the area.
- 2) Traffic impacts resulting from new development pending Board approval.
- 3) Interim measures that may be necessary prior to full implementation of mitigations associated with item numbers 1 and 2.

In the paragraphs that follow, various options are identified that may have the potential for resolving these issues. In several instances, the available options are not mutually exclusive and, where appropriate, staff has recommended more than one option.

#### ***1) Correcting Existing Deficiencies***

Option 1A:

*Sell Road Improvement Bonds, forming a Mello-Roos District or an Assessment District.* Selling Road Improvement Bonds, forming a Mello-Roos District or an Assessment District are funding options. All of these options will address the full range of improvements that the Board may ultimately approve. As a prerequisite to any of these options, the County would need to conduct an analysis of the existing deficiencies and proposed improvements, together with their associated costs. Only then would the necessary funding be determined. Implementing any of these funding options requires voter consent.

Option 1B:

*Initiate a ballot measure to increase either the gas tax or sales tax.* Revenues generated by either of these tax increases could then be earmarked specifically for road improvements and the Board would have further discretion in identifying the specific projects. Of course, these options would most likely be exercised on a Countywide basis and could serve to address similar issues in other areas of the County.

#### ***2) Mitigating Traffic Impacts from New Development***

Option 2A:

*Prioritize existing projects in the RIM Program.* The Board of Supervisors may wish to identify the 12/26 intersection as the first priority funded through RIM. As previously noted, a PSR has been completed for the intersection. However, it is not yet included in

the State Transportation Improvement Program (STIP). If there is a County funding mechanism working through the Calaveras Council of Governments (CCOG), the project has a better chance for State funding. Once local funding is identified, CCOG can then pursue inclusion in the STIP. However, it is unclear at this juncture when the State would be able to earmark any funds for the project. It may be possible for Caltrans District 10 to partially fund the project through the 'Minor A' program when and if funds become available. It is also imperative that the County identifies and commits to a schedule for construction. This does not address all the existing deficiencies in the road system.

**Option 2B:**

*Establish a Benefit Basin for the identified improvements.* A benefit basin is a funding mechanism that the County has employed in the past for various road improvements. However, the existing basins do not have "trigger points" for those improvements. As such, the implementation of the improvements funded by the basins is predicated on full build-out within the basin boundaries, clearly a weakness in the approach. Since we have an immediate need, the past methodology would not work. We would have to recommend that the development community "front" the funds to construct the improvements and then use the basin proceeds as a reimbursement mechanism. Additionally, with a benefit basin, there is no mechanism to apply a fee to existing, developed properties. Since we have an existing condition resulting from those already developed properties, there would not be the nexus to place the entire responsibility of improvement on new development proposals.

**Option 2C:**

*Request that the CCOG seek STIP funding for the identified improvements on State Routes.* The intersection of SR 12/26 is not on the STIP at this time. It would require that CCOG take an action to prioritize it in the update of the Regional Transportation Plan (now in progress) and then submit it for programming in the 2006 STIP and then rely on the CTC to take an action. Once it is in the STIP and the State has funds to allocate, Caltrans could proceed with the project. There is currently a \$2+ billion backlog of projects in the STIP awaiting allocations. However, all of the environmental, right-of-way and design aspects still need to proceed. From a practical standpoint, "pavement on the ground" would be at least a 5-year process. More significantly, this option does not address any of the identified local road improvements.

**Option 2D:**

*Revisit the RIM Program and establish a "tiered" fee with sub-basins.* This option could be tied into Option 1. If the RIM Program were to be modified so that sub-basins were established replacing the Countywide region, fees collected in those sub-basins could be applied to the project in that sub-basin. This would account for more funding available for more localized impacts. It would still not address the existing condition issues.



### 3) *Interim Measures*

Regardless of how the Board may choose to correct the existing deficiencies or mitigate the impacts from new development, immediate action is necessary to continue processing both building permit and land division applications.

#### Option 3A:

1 year moratorium

*Temporarily defer building permit and land division approvals until a fee program or other funding mechanism and CIP Program are in place.* The need for improving the SR 12/26 intersection is well documented. The General Plan sets forth the parameters regarding LOS for roadways. Project approval requires "findings of compliance with the General Plan." Given this current situation, staff cannot make the affirmative findings recommendations.

#### Option 3B:

*Condition any new building or land divisions to participate in any program to be established and require them to contribute their fair share.* While in concept this may appear to be a viable option, it would be attempting to apply some form of future mitigation to an existing impact. This approach is also somewhat problematic as it implies the "blank check" scenario. This approach may be further complicated by the "vesting" status of recently created parcels in that new fees may not be able to be imposed. The Planning Commission or Board would need to make specific health and safety findings to allow application of any fees.

#### Option 3C:

*Apply project-by-project mitigation.* As projects are processed through the County, each one would need to have findings of compliance with the General Plan. Since the current situation does not meet General Plan requirements, each applicant would need to prepare a separate Environmental Impact Report (EIR), each of which would require a separate traffic report. Each EIR would be tasked with identifying its own proportional impacts and appropriate mitigation measures. It would take a significant commitment of resources from both the development community and the County to coordinate the evaluation of the EIRs. The County has historically employed this project-by-project approach. As such, it has not allowed us to review projects in a comprehensive fashion critical to solving current and long-range infrastructure needs. Similar to Option 2, the burden of implementing the identified mitigation measures does not account for the existing conditions.

### **RECOMMENDATIONS**

Public Works recommends that the Board of Supervisors give the Department direction to pursue the following options:

- Option 1A - *Sell Road Improvement Bonds, forming a Mello-Roos District or an Assessment District* or, Option 2A - *Initiate a ballot measure to increase either the gas tax or sales tax*



- Option 2A - *Prioritize existing projects in the RIM Program*
- Option 2B - *Establish a Benefit Basin for the identified improvements.* (Option 2B may not necessary if the Board adopts Option 1A or 1B to fund both existing deficiencies and future improvements)
- Option 2C - *Request that the CCOG seek STIP funding for the identified improvements on State Routes*
- Option 3C - *Apply project-by-project mitigation*

Following Board direction on the selected options, Public Works would implement the following course of action:

- A. Staff to enter into negotiations with a traffic consultant to develop an agreement for professional services to include the following:
  1. Address the existing roadway deficiencies in both the State Highway System and the County-maintained system
  2. Develop a description of future needs for both State Routes and County-maintained roads.
  3. Develop "trigger points" for the timing of mitigation measures/improvements.
  4. Develop an improvement schedule.
  5. Coordinate project costs and the implementation schedule with the financial consultant.
- B. Staff to enter into negotiations with a financial consultant for services as follows:
  1. Phase 1 would be to develop a discussion of the various funding mechanisms together with the pros and cons of each mechanism. This discussion would be brought back to the Board for further direction (Phase 1 could be eliminated if the Board expressed a preference for a particular funding mechanism).
  2. Phase 2 would be contingent upon which funding mechanism the Board chose under Phase 1. The goal of Phase 2 would be to prepare documentation required by State law to implement the financing strategy approved by the Board. This work would include a coordinated effort between the traffic consultant, County staff and financial consultant.
- C. Staff to bring back proposed agreements for both traffic engineering and financial consulting services. Said agreements would include cost proposals and schedules for completion of the work.

## **Road impact fees rejected as excessive**

BY Vanessa Turner

Published in the Calaveras Enterprise **October 10, 2003**

New proposal is due back in three weeks

A proposed schedule of countywide road fees is too high and would hurt the county's economy, the Calaveras County Board of Supervisors decided Monday.

Supervisors were "shocked" by the road impact mitigation fee proposal brought to them by Economic and Planning Systems, a consulting firm hired by the Calaveras Council of Governments. The Council of Governments is the county's regional transportation agency.

Under the proposal, all forms of new development would be subject to the fee based on their impacts on roads, including residential, commercial, office, industrial, schools, churches, libraries, day cares and hospitals.

The proposed fees ranged from \$4,900 on a single-family dwelling, to \$11,530 per golf course hole, \$45,650 per 1,000 square feet of day care and \$176,910 per movie theater screen.

The fees would fund road improvements on regional roads (state highways) and local roads.

Supervisors said they would not support assessing fees on institutions that provide a community good, such as schools, churches, libraries, day cares and hospitals. The board decided that those institutions should be exempt. They also rejected the residential fee as too high. Rather they asked Council of Governments Director George Dondero and consultants to come back in three weeks with a fee more in the area of \$2,500 per new dwelling.

Before the Supervisors made their decision they met privately with the county counsel regarding a pending law suit filed against the county for being lax in establishing a road impact fee.

"We're under a lot of pressure," Supervisor Paul Stein said.

There is a hearing at 9 a.m. on Oct 14 in which the county will protest complaints filed by Phil Cain of Burson, according to Assistant County Counsel Janice Elliot.

Cain is suing Calaveras County for taking 17 years to establish a RIM fee program.

The RIM fee was called for in the county's 1986 General Plan.

County Counsel Skip Batchelder said the plaintiffs are asking the court to order the Board of Supervisors to adopt a RIM fee or stop granting approvals for subdivisions.

Despite pressure from the lawsuit, supervisors delayed a RIM decision until Oct. 27. (JT note—Phil Cain died October 21, 2003)

Angels Camp, Amador, Tuolumne and Stanislaus counties all have a RIM fee in place.

In comparison, Calaveras County's proposed RIM fee per residential unit is the highest at \$4,900 and the RIM fee for commercial development is lower.

The proposed residential fee is higher than the market will bear, Supervisor Tom Tryon said.

We can't become uncompetitive with Amador and Tuolumne counties, he said.

Supervisors decided they wanted an analysis of the economic impact such fees would create.

"Every county handles it differently," Consultant Eric Nickel said. Other supervisors may have adjusted their fees in order to encourage or accommodate a certain land use, he said.

The program would be administered by the county Department of Public Works, and the fee would be paid at the time a building permit is approved.

Public Works and a RIM advisory committee came up with a list of projects for state and local roads to be funded by the RIM program. The projects would cost \$166 million.

Supervisors directed Dondero and consultants to remove state highways from the list of proposed road improvement projects. "We don't have the financial capability to assume responsibility for state roads," Tryon said.

Dondero said he would come back with two options, no state highway projects and a reduced level of state highway projects.

With the fees proposed Monday the program would in 20 years generate \$57 million for the projects. After adding in other funds secured for the projects that leaves \$75 million that the consultant suggests should come from taxpayers.

The balance is from existing development, which the taxes would pay for, Dondero said.

The consultant suggested a local gasoline tax, sales tax, and parcel tax, and increasing the Transient Occupancy Tax. Supervisors agreed with the tax idea and noted it would need two-thirds approval from the voters.

Ray Waller, Building Department director, said there would be an influx of permit submittals before the fee is effective, as there is a 60 day period after supervisors approve the ordinance.

Permits cannot practically be processed immediately but if they are submitted before the ordinance is effective they will not be charged the RIM fee.

The Council of Governments met Wednesday and allocated an additional \$15,000 for consultant fees to reanalyze the RIM program.

# El Dorado slaps traffic fee on home construction

**The price tags on new houses in the county will include as much as \$37,000 to help fund roads.**

**By Cathy Locke -- Bee Staff Writer**

Published 12:01 am PDT Sunday, August 27, 2006

Story appeared in Metro section, Page B1

Story appeared in Metro section, Page B1

Afternoon traffic streams onto Latrobe Road in El Dorado Hills. Sacramento Bee file 2005

[See additional images](#)

The cost of a new home in El Dorado County will include as much as \$37,000 to help pay for roads, after a fee hike approved by the county's Board of Supervisors.

The magnitude of the fee increase ranges from less than 1 percent to 30 percent, depending on location. The hike received guarded backing from the building and real estate industry, but some say it may set the course for a building moratorium.

Funding the services needed for new homes is an issue in all growth areas, and governments take different routes to pay for them, including one-time fees and special assessments. In El Dorado County, officials primarily use one-time fees on each new home and commercial building.

The fee increase puts the majority of the burden for handling traffic growth on new residences rather than on new business construction.

The Board of Supervisors adopted the traffic impact mitigation fee program to meet requirements of the 2004 general plan, the county's blueprint for growth. The new fees replace higher interim fees that were approved in June to keep pace with rising road construction costs.

"There are people who say we're wrong and people who say we're right," board Chairman Jack Sweeney said.

The board approved the new fee program on a 3-1 vote. Supervisor Rusty Dupray favored retaining the higher interim fees. "I don't want to do to future boards what past boards have done to me," he said, arguing that current problems result from a failure to collect enough money.

Transportation Director Richard Shepard said the new program meets general plan requirements for level of service on various roads and provides money to offset fees for affordable housing. The county anticipates it will need \$608.5 million in traffic impact fees over the next 20 years.

By allocating 84 percent of the costs to residential development and only 16 percent to nonresidential construction, Shepard said, the program satisfies board concerns that higher fees for business and commercial construction could stymie economic development. He said the division of costs is justified because approximately 65 percent of nonresidential growth, such as new grocery stores, results directly from increased population.

Fees for new homes in the county will range from \$13,670 to \$37,000, depending on where they are built. The highest fees will be charged for development in the Cameron Park-Rescue area, and the area along Highway 50 west of Placerville.

Shepard said \$1 million in federal and state transportation funds will be set aside annually to allow the county to offer reduced fees for affordable housing. In addition, \$92.4 million in state and federal funds will be used to reduce nonresidential fees.

Art Marinaccio, a Shingle Springs resident who has served on advisory committees to develop the fee program, commended Transportation Department staff members for the new plan. He praised the \$1 million annual set-aside for affordable housing.

"I don't think it's the ultimate fix," Marinaccio said, "but it's a darn good start."

Dolly Wager, representing the El Dorado County Builders Exchange, made up of people in the construction trades, said county staff members were faced with a difficult task.

However, Wager questioned placing so much of the financial burden on new residential development, saying the decision is likely to discourage individuals and small developers from building in the county. "It affects electricians, roofers ... and the family that would have our members build their home," she said.

Critics also said that by spreading costs over 20 years, the program won't raise enough money to fund traffic improvements needed to serve growth projected within the next 10 years.

Some also objected to using state and federal road funds to offset fees, arguing that money should go toward correcting existing road deficiencies.

"I'm real happy I'm not a member of the Board of Supervisors, because you don't have a lot of great options in front of you," county Auditor-Controller Joe Harn told the board."

Board members must either change general plan policies governing traffic improvements and how they are funded, or ask voters to approve a sales tax increase to help pay for road projects, Harn said.

Otherwise, he said, Tuesday's action will, in effect, lead to a moratorium on issuing building permits in five to 10 years.

Former county Supervisor Bill Center said, "I couldn't agree more with Joe Harn. That is a little frightening."

Center said he was speaking as an advocate of Measure Y, an initiative approved by voters in 1998, which requires developers to pay for roads to handle traffic generated by their projects. The measure's provisions are part of the general plan and require that road improvements keep pace with growth.

Center said the new fee program "simply does not work."

The county can't count on receiving the projected amount of state and federal money, and furthermore, he said, Measure Y doesn't allow using that money to pay for projects required because of new development.

Center noted that Shepard had acknowledged that if growth continued at a steady pace, the program would experience a \$130 million shortfall in 10 years.

Board members said the fees will be reviewed and adjusted annually to meet changing needs and costs.

**About the writer:**

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----- Original Message -----

**From:** [Tom Mitchell](#)  
**To:** [Joyce Techel](#)  
**Sent:** Tuesday, August 29, 2006 8:47 AM  
**Subject:** FW: Traffic Fees

Thought you would be interested in this article.

**From:** Tom Mitchell  
**Sent:** Tuesday, August 29, 2006 8:46 AM  
**To:** BOS  
**Cc:** Stephanie Moreno; Rob Houghton; Shirley Ryan; Francine Osborn; Lori Raineri  
([lori@gfsi.com](mailto:lori@gfsi.com))  
**Subject:** Traffic Fees