



BCA BUILDING CONTRACTORS ASSOCIATION
OF SOUTHWESTERN IDAHO, INC.

"A Tradition of Building Excellence for Over 60 Years"

6206 N. Discovery Way, Suite A
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December 12, 2025

Hon. Trevor Chadwick, Mayor
Hon. David Hershey, Council President
City of Star
107698 West State Street
Star, Idaho 83669

Dear Mayor Chadwick, Council President Hershey, and Councilmembers Nielsen, Salmonsens, and Wheelock,

On behalf of the more than 600 member companies of the Building Contractors Association of Southwestern Idaho (BCASWI) we appreciate the opportunity to comment on the City of Star's proposed Parks, Pathway and Trails, and Police Capital Improvement Plan and proposed development impact fee schedule.

The BCASWI is empathetic to the challenges faced by smaller, fast-growing cities like Star. As residential homebuilders in the Treasure Valley, we are not unilaterally opposed to development impact fees or reasonable and appropriate increases. Development impact fees are important and appropriate to maintain infrastructure necessary to accommodate the population and housing growth the Valley has been experiencing. For the homebuilding industry, those improvements allow us to continue to build, to try to meet demand for homes in our current market, and to provide more Idahoans with the opportunity to achieve the dream of homeownership.

Our association appreciates the effort the city staff, Clearwater Analytics, and the Impact Fee Advisory Committee members have put into generating the Star Development Impact Fee Analysis and Capital Improvement Plans report. Through a cursory review of the report, however, we have several concerns – chief among them, that the report utilizes very liberal, questionably legal definitions of what constitutes an "impact fee eligible" expense.

Idaho's development impact fee law allows for use of development impact fees for "Parks, open space and recreation areas and related capital improvements" but does not specifically call out recreation facilities or event centers as an allowable application of those fees. We argue collecting development impact fees to fund improvements to/expansion of the Riverhouse and Indoor Event Center is questionable.

The development impact fee law identifies "capital improvements" as improvements with a useful life of ten (10) years or more. The inclusion of a new shuttle bus, new park maintenance fleet, and new park maintenance equipment is a dubious application under this definition. With the exception of fire apparatus, we are unaware of any entity in the state that categorizes vehicles and equipment as eligible impact fee expenses in this regard. And it is notable that defining fire apparatus as eligible required an act of the legislature to be included in the statute. We also call into question using development impact fees to pay for police vehicles for the same reason.

The development impact fee law does not specify or include pathways and trails as an eligible impact fee expense under the definition of public facilities and should not be considered as an eligible expense. Considering the Star Pathways and Trails master plan and Capital Improvement Plan was only developed and adopted last year, we argue that this proposal constitutes an increased level of service from what exists today – an increase from 17 miles today to 111 miles according to the plan.



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In the limited time we've had to review this document, the BCASWI leadership and members have many more questions and concerns about how certain items were defined as impact fee eligible expenses and how certain calculations were derived in the report. We respectfully ask the City Council to delay any adoption of the report and ordinance to allow for more stakeholder input, conversations, and explanations. We believe there is room for more refinement and quality control to be applied to the Plan.

The collection and application of development impact fees should be appropriately proportional to the "impact" of a particular development, and a clear nexus to that impact should be apparent. Development impact fees should be based on data-driven information and are not meant to be used as "revenue patches" on projects the City seeks to fund without that clear nexus.

The Building Contractors Association of Southwestern Idaho looks forward to working with the City of Star to find an equitable result as you contemplate changes to your development impact fee schedule. Please contact our Executive Officer Jamie Daniels 208-377-3550, eo@bcaswi.org or our government affairs director Ken Burgess 208-861-2052 ken@veritasadvisor.com with any questions you may have.

Sincerely,

Adam Capell, President
Building Contractors Association of Southwestern Idaho