



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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February 26, 2026

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

Re: **Star's proposed Capital Improvement Plan and Impact Fee Schedule**

Dear Mayor Chadwick and Council Members,

The Building Contractors Association of Southwestern Idaho (BCASWI) represents more than 600 member companies and 15,000 people, who care deeply about our region. We appreciate the opportunity to comment on the City of Star's proposed Parks, Pathway and Trails, and Police Capital Improvement Plan and development impact fee schedule (Plan.) While the BCASWI remains concerned about components of the proposed Plan, we want to express our sincere gratitude, specifically to Mayor Chadwick, for the open dialogue over the past three months. Our association also recognizes the effort city staff, Clearwater Financial, and the Impact Fee Advisory Committee members have put into generating and revising the Star Development Impact Fee Analysis and Capital Improvement Plans report. The willingness to listen, even in the face of fundamental disagreement, is a testament to Star's commitment to transparency and engaged governance. We find that rare in today's political environment and do not take it for granted.

BCASWI is empathetic to the challenges faced by smaller, fast-growing cities like Star, and we are not categorically opposed to development impact fees or tenable fee increases. Development impact fees are one valuable tool in a quite limited toolbox in the State of Idaho to fund public infrastructure necessary to accommodate the growth the Treasure Valley has been experiencing. Idaho State law requires development impact fees be fair and proportional to the "impact" of development, with a clear nexus to that impact. Development impact fees also must be based on data-driven information and are not to be used as "revenue patches" for projects the City should be funding through other sources. It is also important to understand that if the Council adopts the impact fee increases as currently proposed, it will effectively increase the cost of housing in the City of Star by \$85 million over the next ten years.

The BCASWI has been consistent in vocalizing additional and specific concerns with the Plan in terms of calculations of current level of service, land cost, growth assumptions, and the inclusion of proposed expenses cited to be eligible under the impact fee law. To check our own assumptions, the BCA commissioned a third-party analysis of the Plan to better inform our positions and assist in the City in its considerations of next steps or potential revisions. **LAUNCH's analysis validated BCA's concerns, highlighting perilous flaws in the current proposal.** In the spirit of collaboration and transparency, the analysis, authored by LAUNCH Development Finance Advisors, is attached for your review. **The BCA requests City Council table (to a date uncertain) any action on the Plan and related fee schedule at the March 3rd Council meeting.**



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The BCASWI would like to remain engaged in a productive and collaborative manner. We desire to be a partner in requisite next steps. Additional legal analysis, continued engagement with stakeholders, and development of legal and feasible alternatives should be expeditiously completed. We request the Plan and fee schedule be modified to substantiate fair, legal, and equitable impact fees. After reviewing the LAUNCH analysis, BCASWI leadership has concluded that these fees are adopted as currently proposed, we will have no choice but to legally challenge them.

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

Cc: Star City Council
Star City Attorney
Jason Risch, BCASWI Legal Counsel
BCASWI Executive Board