

2022

School Facilities Fee Justification Report

*Prepared Pursuant to
Government Code Section 66001*

Approved on June 8, 2022

**Antelope Valley
Joint Union
High School
School District**



A division of California Financial Services

Table of Contents

I.	Introduction	1
II.	The School District.....	3
III.	District Facilities Needs	4
	A. Enrollment.....	4
	B. Capacity of District Facilities	10
	C. District Facilities Needs	10
	D. Plan to Provide for District Facility Needs	11
IV.	Financial Impact of Residential Development	12
	A. Estimated Cost of School Facilities.....	12
	B. Cost of Meeting School Facility Needs	12
	C. Cost of Providing School Facilities Per Square Foot of Future Residential Development	13
V.	Comparison of Impact and Residential School Fee Revenue	15
	A. Maximum Residential School Fee.....	15
	B. Comparison of Impact and Maximum School Fee.....	15
VI.	Financial Impact of Commercial/ Industrial Development	16
	A. Employees Per 1,000 Square Feet	16
	B. Household Impact	18
	C. Student Generation Impact.....	20
	D. Cost of Providing School Facilities.....	22
	E. Residential School Fee Revenue Offset.....	23
VII.	Comparison of Impact and Commercial/Industrial Fee Revenues	25
	A. Maximum Commercial/Industrial School Fee	25
	B. Comparison of Impact and Maximum School Fee.....	25
VIII.	Conclusion and Statement of Findings	27

Exhibit A: Analysis of Current School Facility Capacity

Exhibit B: Summary of Estimated School Facilities Cost

I. Introduction

In 1986, the Governor signed into law Assembly Bill (“AB”) 2926. AB 2926 provided for the addition of several sections to the Government Code establishing the ability of school districts to impose impact fees on new residential development (“Future Residential Development”) and commercial/industrial development (“Future Commercial/Industrial Development”) for the construction or reconstruction of school facilities (“School Fees”).

AB 2926 also established cities or counties may not issue a building permit for a development project unless such School Fees have been paid and set the maximum level of School Fees at \$1.50 per square foot for residential development and \$0.25 per square foot for commercial/industrial development. Initially these maximums were subject to increase each year based on a statewide cost index, as determined by the State Allocation Board (“SAB”); however, the adjustment provisions were subsequently extended to every other year by AB 181. Pursuant to AB 2926 a school district wishing to impose School Fees must determine that the School Fees “are reasonably related and limited to the need for school facilities caused by the development”.

In 1987 AB 1600 was enacted providing additional guidance regarding the establishment of School Fees. Specifically, AB 1600 requires that public agencies satisfy the following requirements when establishing and imposing an impact fee as a condition of approval for a development project:

- Determine the purpose of the fee.
- Identify the facilities to which the fee will be applied.
- Determine that there is a reasonable relationship between the need for public facilities and the type of development on which a fee is imposed.
- Determine that there is a reasonable relationship between the amount of the fee and the public facility of portion of the facility attributable to the development on which the fee is imposed.

- Provide an annual accounting of any portion of the fee remaining unexpended, whether committed or uncommitted, in the school district's accounts five (5) or more years after it was collected.

The purpose of this School Facilities Fee Justification Report (the "Report") is to provide the information necessary to satisfy these requirements for the imposition of School Fees, pursuant to AB 2926, by the Antelope Valley Joint Union High School District (the "District").

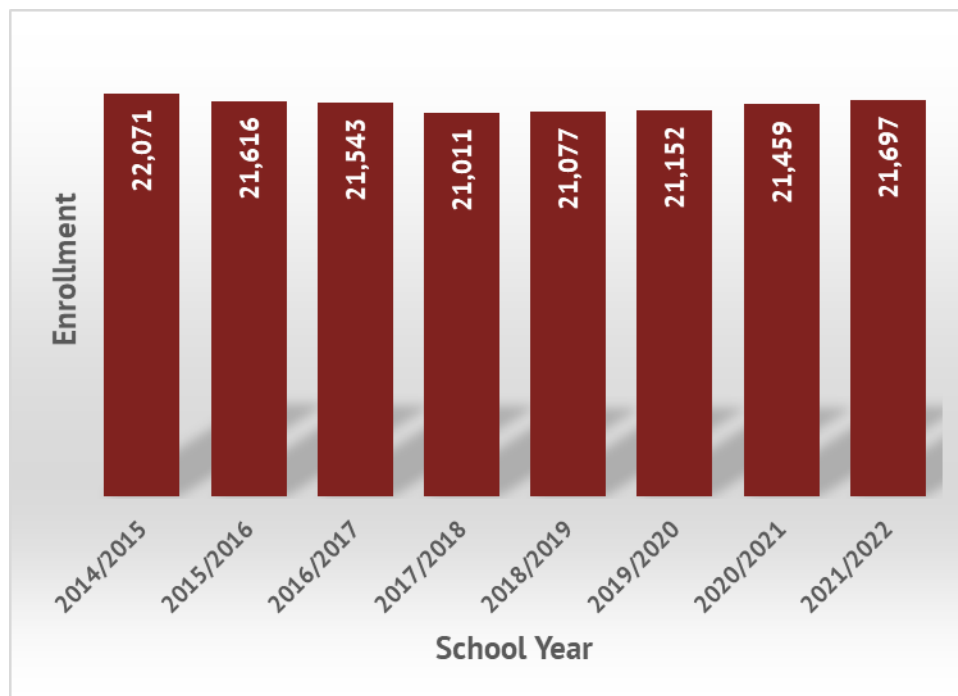
III. District Facilities Needs

In order to identify the impact of Future Residential Development on the facilities of the District this Report (i) evaluates the District’s current and projected enrollment, (ii) establishes the capacity of the District’s existing facilities and (ii) identifies a plan to meet the District’s facility needs.

A. Enrollment

1. Historical Enrollment – This Report uses the California Basic Educational Data System (CBEDS) to identify the District’s enrollment over the past eight (8) years. Over the past eight (8) years the District has experienced stable enrollment growth; however, based on the amount of planned residential development, the District expects enrollment to increase in the future. Chart 1 shows the historical enrollment during this period.

Chart 1
Historical Enrollment Trend



2. Enrollment as a Result of Future Residential Development –

a. Future Residential Development - To evaluate the enrollment expected as a result of Future Residential Development, this Report must first determine the number of units that are expected to be constructed within the District’s boundaries.

Based on information provided by the Southern California Association of Governments (“SCAG”), the District expects the construction of approximately 35,873 residential units through calendar year 2035 (“Future Units”). Table 1 outlines the Future Units.

Table 1
Future Residential Development

Land Use	Future Units
Single Family Detached (SFD)	29,215
Multi-Family Attached (MFA)	6,658
Total	35,873

b. Reconstruction - Reconstruction means the voluntary demolition of existing residential dwelling units or commercial/industrial construction and the subsequent construction of new residential dwelling units (“Reconstruction”).

The District acknowledges that Reconstruction projects may occur. In such a situation, the District shall levy School Fees if there is a nexus established between the impact of the new residential dwelling units in terms of a net increase in students generated and the fee to be imposed. In other words, the School Fees must bear a nexus to the burden caused by the Reconstruction project.

- i. **Existing Residential Dwelling Units** - To the extent Reconstruction increases the residential square footage beyond what was demolished ("New Square Footage"), the increase in square footage is subject to the applicable School Fee as such construction is considered new residential development. As for the amount of square footage constructed that replaces only the previously constructed square footage ("Replacement Square Footage"), the determination of the applicable fee, if any, is subject to a showing that the Replacement Square Footage results in an increase in student enrollment and, therefore, an additional impact being placed on the District to provide school facilities for new student enrollment.

As of the date of this Report, the large-scale Reconstruction of residential development within the District has not occurred to the point where statistically significant data can be utilized to determine if Replacement Square Footage increases student enrollment. Therefore, prior to the imposition of School Fees on Replacement Square Footage, the District may undertake an analysis on any future proposed project(s) and may amend/update this Report. Such analysis will examine the extent to which an increase in enrollment can be expected from Replacement Square Footage due to any differential in student generation rates as identified in the Report for the applicable unit types between existing square footage and Replacement Square Footage. To the extent it can be demonstrated that Replacement Square Footage will increase student enrollment, the District may then impose a fee on the Replacement Square Footage. This fee amount on Replacement Square Footage shall be calculated by determining the cost impacts associated with any growth in student enrollment from the Replacement Square Footage. Any such fee that is

calculated for the Replacement Square Footage shall not exceed the School Fee that is in effect at such time.

- ii. **Existing Commercial/Industrial Construction** - As with Reconstruction of existing residential dwelling units, there is not significant information regarding (i) the amount of Commercial/Industrial Reconstruction planned within the District or (ii) historical levels, which might indicate the amount to be expected in the future. Due to the lack of information, the District has decided to evaluate the impacts of Commercial/Industrial Reconstruction projects on a case-by-case basis and will make a determination of whether a fee credit is justified based on the nature of the project.

The fee credit determination will be based upon a comparison of the impacts of the planned residential project and the existing land use category (i.e. retail and services, office, research and development, industrial/warehouse/manufacturing, hospital, or hotel/motel). The actual impacts of the planned residential project will be reduced by the impact of the existing commercial/industrial category (derived from calculations contained in this Report). Any reduction to the School Fee would only occur if the reduced amount falls below the School Fee. In such a case, the District would levy the reduced amount per square foot of new residential construction for the subject Reconstruction project.

c. **Student Generation Factors** - To estimate the impact on the District’s enrollment of Future Units, Student Generation Factors (“SGFs”) must be established. *KeyAnalytics* calculated SGFs for each of the following land use categories:

- **Single Family Detached (“SFD”)** – Units are stand-alone structures on their own lot with a unique Assessor’s parcel number.
- **Single Family Attached (“SFA”)** – Units share common walls, usually on both sides of the property, where each is assigned a unique Assessor’s parcel number (e.g. townhomes, condominiums, duplexes).
- **Multi-Family Attached (“MFA”)** – Units share common walls in a building or structure designed to house several families in separate housing units.

The process of determining SGFs involved cross-referencing the District’s enrollment data against the County Assessor residential data. Sorting and extracting the County Assessor records by land use, *KeyAnalytics* developed a database of residential units. This database was then compared with the District’s student enrollment database to identify address matches. Since the District does not expect the construction of SFA units, this calculation was not performed for this unit type. Tables 2A and 2B outline the results of this analysis.

Table 2A
Student Generation Factors
Single Family Detached Units (SFD)

School Level	Students Matched	Single Family Detached Units	Student Generation Factors
High School (Grade 9-12)	17,546	93,699	0.1873
Total	17,546	93,699	0.1873

Table 2B
Student Generation Factors
Multi-Family Attached Units (MFA)

School Level	Students Matched	Multi-Family Attached Units	Student Generation Factors
High School (Grade 9-12)	939	13,595	0.0691
Total	939	13,595	0.0691

Due to incomplete or incorrect address information in both the student enrollment and residential databases, *KeyAnalytics* was unable to match all the District's students. The results are SGFs that understate the number of students that will be generated by Future Units.

After accounting for incoming inter-district transfer students that reside outside of the District's boundaries, *KeyAnalytics* adjusted the SGFs listed in Tables 2A and 2B based on a rate which considers the number of students successfully matched at each school level and land use. The adjusted SGFs for each land use by school level which will be utilized in this Report are shown in Table 3.

Table 3
Adjusted Student Generation Factors

School Level	Single Family Detached Units	Multi-Family Attached Units
High School (Grade 9-12)	0.1978	0.0730
Total	0.1978	0.0730

- d. Projected Enrollment** - When these SGFs are applied to the projected Future Units the resulting enrollment impact is 6,264 students. Table 4 outlines this calculation.

Table 4
Projected Enrollment
As a Result of Future Units

Land Use	Future Units	Student Generation Factors	Projected Students
Single Family Detached (SFD)	29,215	0.1978	5,778
Multi-Family Attached (MFA)	6,658	0.0730	486
Total	35,873	NA	6,264

B. Capacity of District Facilities

To establish the capacity of the District’s facilities, this Report utilizes the District’s baseline capacity established with the SAB and makes adjustments for subsequent construction projects. Additional information regarding the determination of the District’s capacity has been included in Exhibit A. Table 5 summarizes the District’s current capacity.

Table 5
Current Facility Capacity

School Level	Facilities Capacity
High School (Grade 9-12)	22,055
Total	22,055

C. District Facility Needs

To evaluate the school facilities needed as a result of Future Units, this Report must first determine if there is any existing capacity that can be used to house future enrollment. This District enrollment for school year 2021/2022 is 21,697 students. Since the District’s enrollment is less than the District’s current facility capacity this Report has determined there is 358 existing seats that may be utilized to house students expected to be

generated by Future Units. Table 6 summarizes the calculation of Unhoused Students expected to be generated by Future Units.

**Table 6
Calculation of Unhoused Students**

School Level	Projected Students	Existing Surplus Seats	Unhoused Students
High School (Grade 9-12)	6,264	358	5,906

D. Plan to Provide for District Facility Needs

The District plans to construct new school facilities to meet the needs of the Unhoused Students. The timing of these improvements are unknown and rely heavily on the District’s ability to access both local and State funding for such projects and the pace of Future Residential Development. Table 7 outlines the number of facilities needed by the District to house the projected Unhoused Students resulting from Future Units.

**Table 7
School Facility Needs
As a Result of Future Units**

School Level	Unhoused Students	Facility Capacity	Number of Facilities Needed
High School (Grade 9-12)	5,906	2,500	2.3624

IV. Financial Impact of Residential Development

As outlined in Section III, Future Units are expected to generate additional enrollment for the District resulting in the need to construct new school facilities. This Section quantifies the financial impact of the Unhoused Students resulting from Future Units.

A. Cost of School Facilities

School construction costs were estimated by *KeyAnalytics*. The school facilities costs represent the full cost of site development, construction, furniture and equipment, as well as technology. The District currently owns property that can be utilized for a future school site, as a result this Report does not include the cost of site acquisition. The estimated site acquisition and facility construction costs by school level are shown in Table 8 below while the costs for each component of the school facilities construction are listed in Exhibit B.

Table 8
Estimated School Facilities Cost

School Level	Construction Cost Per Facility ¹	Site Cost Per Facility ²	Total Cost Per Facility
High School (Grade 9-12)	\$265,772,314	\$0	\$265,772,314

¹ Construction cost costs represent the full cost of site development, construction, furniture and equipment, as well as technology.

² The District already owns future school sites.

B. Cost of Providing School Facilities

This Report determines the cost of providing school facilities to house Unhoused Students resulting from Future Units by multiplying the number of facilities needed, listed in Table 7, by the Estimated School Facilities Cost, listed in Table 8. Table 9 outlines the estimated total cost of providing school facilities to house Unhoused Students resulting from Future Units.

**Table 9
Total Cost of Providing School Facilities
As a Result of Non-Mitigated Future Units**

School Level	Number of Facilities	Cost Per Facility	Total Cost
High School (Grade 9-12)	2.3624	\$265,772,314	\$627,860,514
Total Cost Impact			\$627,860,514

C. Cost of Providing School Facilities per Sq. Ft. of Future Residential Development

To determine the cost of providing school facilities per square foot of Future Residential Development, this Report first allocates the Total Cost of Providing School Facilities to the Future Units based on land use. Table 10 shows the calculation of the Cost of Providing School Facilities per Future Unit.

**Table 10
Cost of Providing School Facilities
Per Future Units**

Land Use	Total School Facilities Cost Impacts	Future Units	School Facilities Cost Per Future Unit
Single Family Detached (SFD)	\$579,138,538	29,215	\$19,823.33
Multi-Family Attached (MFA)	\$48,721,976	6,658	\$7,317.81
Total	\$627,860,514	35,873	\$17,502.31

The Cost of Providing School Facilities per Future Unit is then divided by the average square footage of Future Units for each land use category.

To determine the average square footage *KeyAnalytics* has utilized the square footage of existing homes within the District. Table 11 shows the cost of providing school facilities per square foot of Future Unit.

Table 11
Cost of Providing School Facilities
Per Square Foot of Future Unit

Land Use	School Facilities Cost Per Future Unit	Average Square Footage ¹	School Facilities Cost Impact Per Square Foot
Single Family Detached (SFD)	\$19,823.33	1,800	\$11.01
Multi-Family Attached (MFA)	\$7,317.81	1,004	\$7.29

¹ Average Square Footage has been calculated based on the average square footage of existing homes within the District.

V. Comparison of Impact and School Fee Revenue from Future Residential Development

As noted in the introduction to this Report, the maximum level of School Fee that may be imposed by a school district on Future Residential Development is set by the SAB. In order to impose School Fees at this level, the District must demonstrate that the cost of providing school facilities equals or exceeds the amount of the School Fee to be imposed. This section compares the maximum School Fee that may be imposed by the District with the cost of providing school facilities per square foot of Future Residential Development as established in Section IV.

A. Maximum Residential School Fee

On February 23, 2022, the SAB approved an increase to the maximum School Fee that may be imposed by a unified school district on Future Residential Development to \$4.79 per square foot. The District is required to share a portion of the maximum School Fee with their feeder elementary school districts, as a result the District can only collect 26 percent, or \$1.25 per square foot, for all new Future Units built within its boundaries.

B. Comparison of Financial Impact and Maximum School Fee Revenues Per Square Foot

This Report identifies in Section IV that the cost of providing school facilities per square foot of Future Residential Development ranges from \$7.29 – 11.01.

Since the current maximum School Fee is less than the cost of providing school facilities per square foot of Future Residential Development, the District is justified in imposing their portion of the maximum School Fee of \$1.25 per square foot for all Future Residential Development within its boundaries.

VI. Financial Impact of Commercial/Industrial Development

This Section analyzes the financial impact on the District resulting from students that are generated by Future Commercial/Industrial Development.

Future Commercial/Industrial Development will attract additional workers to the District. Because some of those workers will have school-age children, such Future Commercial/Industrial Development will generate additional enrollment for the District. The District is also likely to experience additional enrollment as a result of new workers who do not live within the District's boundaries, but whose children attend the District's schools as a transfer student.

A. Employees Per 1,000 Square Feet of Commercial/Industrial Development

To identify the impact of Future Commercial/Industrial Development this Report must first estimate the number of employees that will be generated by such development.

- 1. Employee Generation Rate** - As permitted by State law, this Report estimates the number of employees to be generated by Future Commercial/Industrial Development by utilizing the generation factors set forth San Diego Association of Governments ("SANDAG"). Table 12 shows these generation rates.

Table 12
Employee Generation Rates
Per 1,000 Square Feet of Commercial/Industrial Development

Commercial/Industrial Category	Average Square Feet Per Employee	Employees Per 1,000 Square Feet
Retail and Services	447	2.2371
Office	286	3.4965
Research and Development	329	3.0395
Industrial/Warehouse/Manufacturing	371	2.6954
Hospital	360	2.7778
Hotel/Motel	883	1.1325
Self Storage	15,552	0.0643

Source: SANDAG

2. Percentage of Employees Residing Within the District - To accurately identify the number of employees that will reside within the District, this Report adjusts the Employee Generation Rates list in Table 12 to account for employees that may not live within the District.

To estimate the percentage of employees that will reside within the District this Report utilizes data collected by the US Census Bureau measuring individual's commute time. Based on this information, approximately 38.80 percent of employees within the District are likely to reside within the District. Table 13 show the Resident Employee Generation Rates.

Table 13
Resident Employee Generation Rates
Per 1,000 Square Feet of Commercial/Industrial Development

Commercial/Industrial Category	Employee Generation Rates	Employees Residing Within the District	Resident Employee Generation Rates
Retail and Services	2.2371	0.3880	0.8680
Office	3.4965	0.3880	1.3566
Research and Development	3.0395	0.3880	1.1793
Industrial/Warehouse/Manufacturing	2.6954	0.3880	1.0458
Hospital	2.7778	0.3880	1.0778
Hotel/Motel	1.1325	0.3880	0.4394
Self Storage	0.0643	0.3880	0.0249

B. Household Impact

As noted in Section III, the SGFs calculated for the District are based on the number of students generated per housing unit. Therefore, this Report must convert the number of resident employees into the resulting number of new households to estimate the number of students to be generated.

1. **Average Number of Employees per Household** - To estimate the number of households to be generated by these resident employees, this Report utilizes information collected by the US Census Bureau. According to the US Census Bureau the average number of employed persons per household within the District is 1.1801.
2. **Household Impact Per 1,000 Square Feet of Commercial/Industrial Development** - The Household Impact per 1,000 Square Feet of Commercial/Industrial Development is calculated by dividing the Average Number of Employees per Household by the Resident Employee Generation Rates listed in Table 13. Table 14 summarizes this calculation.

Table 14
Household Impact
Per 1,000 Square Feet of Commercial/Industrial Development

Commercial/Industrial Category	Resident Employee Generation Rate	Average Employees Per Household	Household Impact Per 1,000 Square Feet
Retail and Services	0.8680	1.1801	0.7355
Office	1.3566	1.1801	1.1496
Research and Development	1.1793	1.1801	0.9993
Industrial/Warehouse/Manufacturing	1.0458	1.1801	0.8862
Hospital	1.0778	1.1801	0.9133
Hotel/Motel	0.4394	1.1801	0.3723
Self Storage	0.0249	1.1801	0.0211

3. Net Household Impact Per 1,000 Square Feet of Commercial/Industrial Development - To identify the Net Household Impact per 1,000 Square Feet of Commercial/Industrial Development this Report must account for employees that will reside within existing residential units.

Based on historical home sales information, new home sales are estimated to make up 4.21 percent of the total housing units which will experience occupant turnover during the period considered in this Report. Multiplying the Household Impact per 1,000 Square Feet of Commercial/Industrial Development shown in Table 14 by 4.21 percent results in the Net Household Impact per 1,000 Square Feet of Commercial/Industrial Development shown in Table 15.

Table 15
Net Household Impact
Per 1,000 Square Feet of Commercial/Industrial Development

Commercial/Industrial Category	Household Impact Per 1,000 Square Feet	Adjustment for Resale Units	Net Household Impact Per 1,000 Square Feet
Retail and Services	0.7355	0.0421	0.0310
Office	1.1496	0.0421	0.0484
Research and Development	0.9993	0.0421	0.0421
Industrial/Warehouse/Manufacturing	0.8862	0.0421	0.0373
Hospital	0.9133	0.0421	0.0384
Hotel/Motel	0.3723	0.0421	0.0157
Self Storage	0.0211	0.0421	0.0009

Only the Net Household Impacts are assumed to generate potential new students, thereby increasing school facilities costs to the District.

C. Student Generation Impact

This Report recognizes that employees may impact the District in two ways. First, some of the employees will reside within the District and have school aged children who attend the District’s schools. Secondly, of those employees that do not reside within the District some will have school aged children who choose to attend the District’s school as transfer students.

- 1. Resident Student Generation Impact** - To estimate the number of resident students to be generated per 1,000 Square Feet of Commercial/Industrial Development this Report multiplies the SGFs, outlined in Section III, by the Net Household Impacts listed in Table 15. The resulting Resident Student Generation Impact per 1,000 Square Feet of Commercial/Industrial Development is listed Table 16.

Table 16
Resident Student Generation Impact
Per 1,000 Square Feet of Commercial/Industrial Development

Commercial/Industrial Category	High School (Grades 9-12)
Retail and Services	0.0054
Office	0.0084
Research and Development	0.0073
Industrial/Warehouse/Manufacturing	0.0065
Hospital	0.0067
Hotel/Motel	0.0027
Self Storage	0.0002

2. Inter-District Transfer Student Generation Impact - To estimate the number of inter-district transfer students that may be generated, this Report utilizes enrollment data of the District. The total number of inter-district transfer students attending District schools was divided by the total number of employed persons within the District, as estimated by the US Census bureau. This calculation is summarized in Table 17.

Table 17
Inter-District Transfer Rate Per Employee

Item	High School (Grades 9-12)
Number of Employed Persons	142,247
Number of Inter-District Transfers	50
Inter-District Transfers Per Employee	0.0004

3. Total Student Generation Impact Per 1,000 Square Feet of Commercial/Industrial Development - The Inter-District Transfer Rates, listed in Table 17, were multiplied by the Employee Generation Rates in Table 12 to calculate Inter-District Transfer Rates per 1,000 Square Feet of Future Commercial/Industrial Development. These Inter-District Transfer Rates were added to the Resident Student Generation Impact per 1,000 Square Feet of Commercial/Industrial Development, listed in Table 16, to calculate the Total Student Generation Impact per 1,000 Square Feet of Commercial/Industrial Development list in the Table 18.

Table 18
Total Student Generation Impact
Per 1,000 Square Feet of Commercial/Industrial Development

Commercial/Industrial Category	High School (Grades 9-12)
Retail and Services	0.0063
Office	0.0098
Research and Development	0.0086
Industrial/Warehouse/Manufacturing	0.0076
Hospital	0.0078
Hotel/Motel	0.0032
Self Storage	0.0002

D. Cost of Providing School Facilities Per 1,000 Square Feet of Commercial/Industrial Development

To calculate the Cost of Providing School Facilities per 1,000 Square Feet of Commercial/Industrial Development, this Report calculates the cost impact per student using the information listed in Table 8 and multiplies the per student cost by the Total Student Generation Impacts listed in Table 18. Tables 19A and 19B outline the resulting Cost of Providing School Facilities per 1,000 Square Feet of Commercial/Industrial Development.

**Table 19A
Cost of Providing School Facilities
Per Student**

School Level	Facility Cost	Facility Capacity	Facility Cost Per Student
High School (Grade 9-12)	\$265,772,314	2,500	\$106,308.93

**Table 19B
Cost of Providing School Facilities
Per 1,000 Square Feet of Commercial/Industrial Development**

Commercial/Industrial Category	High School (Grades 9-12)
Retail and Services	\$669.83
Office	\$1,046.95
Research and Development	\$910.07
Industrial/Warehouse/Manufacturing	\$807.07
Hospital	\$831.75
Hotel/Motel	\$339.06
Self Storage	\$19.22

E. Residential School Fee Revenue Offset

A portion of the Cost of Providing School Facilities per 1,000 Square Feet of Commercial/Industrial Development will be mitigated through the collection of School Fees from Future Residential Development. To estimate the amount of these School Fees that will be collected, this Report multiplies the estimated average square footage of a Future Unit, by the District’s Residential School Fee of \$1.25. This amount is then multiplied by the Net Household Impacts listed in Table 15. Table 20 outlines this calculation.

Table 20
Residential School Fee Revenue
Per 1,000 Square Feet of Commercial/Industrial Development

Commercial/Industrial Category	Net Household Impact	Average Developer Fee	Residential Revenue
Retail and Services	0.0310	\$2,065.33	\$63.94
Office	0.0484	\$2,065.33	\$99.94
Research and Development	0.0421	\$2,065.33	\$86.88
Industrial/Warehouse/Manufacturing	0.0373	\$2,065.33	\$77.04
Hospital	0.0384	\$2,065.33	\$79.40
Hotel/Motel	0.0157	\$2,065.33	\$32.37
Self Storage	0.0009	\$2,065.33	\$1.83

The Residential School Fee Revenue per 1,000 Square Feet of Commercial/Industrial Development listed in Table 20 is then subtracted from Cost of Providing School Facilities per 1,000 Square Feet of Commercial/Industrial Development identified in Table 19B to calculate the Remaining Cost of Providing Facilities per 1,000 Square Feet of Commercial/Industrial Development. Table 21 outlines this calculation.

Table 21
Remaining Cost of Providing Facilities
Per 1,000 Square Feet of Commercial/Industrial Development

Commercial/Industrial Category	Cost of Providing School Facilities	Residential School Fee Revenue	Remaining Cost of Providing School Facilities
Retail and Services	\$669.83	\$63.94	\$605.88
Office	\$1,046.95	\$99.94	\$947.00
Research and Development	\$910.07	\$86.88	\$823.20
Industrial/Warehouse/Manufacturing	\$807.07	\$77.04	\$730.02
Hospital	\$831.75	\$79.40	\$752.35
Hotel/Motel	\$339.06	\$32.37	\$306.70
Self Storage	\$19.22	\$1.83	\$17.39

VII. Comparison of Impacts and Fee Revenue from Commercial/Industrial Development

As with Future Residential Development the maximum level of School Fee that may be imposed by a school district on Future Commercial/Industrial Development is set by the SAB. In order to impose School Fees at the maximum level the District must demonstrate that the cost of providing school facilities does not exceed the amount of the School Fees to be imposed. This section compares the maximum School Fee that may be imposed by the District, with the cost of providing school facilities as a result of Commercial/Industrial Development, as established in Section V.

A. Maximum Commercial/Industrial School Fee

On February 23, 2022, the SAB approved an increase to the maximum School Fee that may be imposed by a unified school district on Commercial/Industrial Development to \$0.78 per square foot. The District is required to share the maximum School Fee with their feeder elementary school districts, as a result the District can only collect 26 percent, or \$0.20 per square foot.

B. Comparison of Financial Impact and Maximum School Fee Revenues Per Square Foot of Commercial/Industrial Development

This Report identified in Section VI that the Remaining Cost of Providing School Facilities per 1,000 Square Feet of Commercial/Industrial Development ranges from \$17.39 to \$947.00. Table 22 compares these costs to the maximum School Fee for Commercial/Industrial Development.

Table 22
Comparison of Remaining Cost of Providing School Facilities

Commercial/Industrial Category	Remaining Cost of School Facilities		District's Share of Maximum School Fee	Justified School Fee
	Per 1,000 Square Feet	Per Square Foot		
Retail and Services	\$605.88	\$0.6060	\$0.20	\$0.20
Office	\$947.00	\$0.9470	\$0.20	\$0.20
Research and Development	\$823.20	\$0.8230	\$0.20	\$0.20
Industrial/Warehouse/Manufacturing	\$730.02	\$0.7300	\$0.20	\$0.20
Hospital	\$752.35	\$0.7520	\$0.20	\$0.20
Hotel/Motel	\$306.70	\$0.3070	\$0.20	\$0.20
Self Storage	\$17.39	\$0.0170	\$0.20	\$0.02

Since the District's share of the current maximum School Fee is less than the Remaining Cost of Providing School Facilities per Square Foot of Commercial/Industrial Development in all categories with the exception of Self Storage, the District is justified in imposing a School Fee of \$0.20 per square foot for these Future Commercial/Industrial Development within its boundaries. The District is justified in imposing a School Fee of \$0.02 per square foot for future Self Storage projects.

VIII. Conclusion and Statement of Findings

Based on the findings of this School Facilities Fee Justification Report the District is justified in collecting their portion of the legal maximum fee (\$4.79) which is **\$1.25 per square foot of residential development** as authorized by Government Code Section 65995, as future residential development creates a school facility impact greater than the legal maximum fee. The District is also justified in collecting their portion of the legal maximum fee (\$0.78) which is **\$0.20 per square foot of commercial/industrial development** on all categories of commercial/ industrial development except Self Storage projects.

The findings of this Report are based on the following:

- According to SCAG there are 35,873 residential units planned to be built within the District.
- These residential units are expected to generate 5,906 Unhoused Students. The District expects these students will require the District to construct new school facilities.
- Each square foot of future residential development creates an estimated school facility cost impact between \$7.29 – \$11.01.
- If the District collects their portion of the maximum school fee which is \$1.25, fee revenue will offset between 13.08 – 19.75 percent of the school facility cost impact of such residential development.
- Future commercial/industrial development will create the need for additional school facilities by increasing the number of households within the District and the number of inter-district transfer students.
- After accounting for the collection of the maximum school fee from residential development the remaining school facilities cost impact of commercial/ industrial development ranges between \$0.017 and \$0.947 per square foot depending on the category of development.

- If the District collects their portion of the maximum school fee which is \$0.20 per commercial/industrial square foot, fee revenue will offset between 21.12 – 65.15 percent of the school facility cost impact of development in all categories except Self Storage where the District can offset 100 percent on the impact by collecting a fee of \$0.02 per square foot.

Exhibit A

Analysis of Current School Facility Capacity

**ANTELOPE VALLEY UNION HIGH SCHOOL DISTRICT
SCHOOL FACILITIES CAPACITY ANALYSIS**

State Application	Description	High School (Grades 9-12)
N/A	SAB Form 50-02	14,081
N/A	Non-Severe/Severe Capacity	572
50/64246-00-001	R. Rex Parris Continuation High	351
50/64246-00-004	Communty Day South	128
50/64246-00-005	Communty Day North	162
50/64246-00-007	Pete J. Knight High	3,332
50/64246-00-008	Highland High	405
50/64246-00-009	Eastside High	2,862
50/64246-00-010	Eastside High	162
Total Capacity	22,055	

Exhibit B

Summary of Estimated School Facilities Cost

ANTELOPE VALLEY UNION HIGH SCHOOL DISTRICT
Summary of Estimated Costs
High School
May 2022

A. Site			\$0
	Site Purchase Price		\$0
	Acres	61.50	
	Cost Per Acre	\$0	
	EIR		\$0
	Appraisals		\$0
	Surveys		\$0
	Escrow/Title		\$0
B. Plans			\$12,579,281
	Architect's Fee	\$11,203,125	
	DSA/SDE Plan Check	\$1,191,938	
	CDE Plan Check Fee	\$154,219	
	Energy Fee Analysis	\$30,000	
	Preliminary Testing	\$70,000	
C. Construction			\$220,312,500
	Square Feet Per Student	125	
	Cost Per Square Foot ¹	\$705	
D. Testing			\$50,000
E. Inspection			\$720,000
	Cost Per Month	\$30,000	
	Months	24	
F. Furniture and Equipment			\$4,406,250
	Percent of Construction Cost	2.00%	
G. Contingency			\$11,015,625
	Percent of Construction Cost	5.00%	
H. Items Not Funded By State			\$16,688,657
	Technology (5% of Construction)	\$11,015,625	
	Library Books (8 books/student @ \$15)	\$400,000	
	Landscaping (\$0.44 per Sq. Ft.)	\$1,178,734	
	Landscaping Architect Fees (8% of Landscaping)	\$94,299	
	Stadium and Track ¹	\$4,000,000	
I. Total Estimated Cost			\$265,772,314
	School Facility Capacity		2,500
	School Facility Cost Per Student		\$106,309

¹The construction cost used in the District's 2020 School Fee Justification Study has been increase by the change in the SAB construction cost index.