

RESOLUTION NO. 20-22-23

RESOLUTION OF THE BOARD OF EDUCATION
OF THE ORANGE UNIFIED SCHOOL DISTRICT
UPDATING SCHOOL FACILITIES FEES

January 19, 2023

WHEREAS, this Board has adopted a resolution levying school facilities impact fees under Education Code section 17620 and has subsequently adopted resolutions updating the amount of those fees as authorized in that section, which resolution is incorporated by reference into this Resolution.

WHEREAS, the District published a Notice of Proposed Adoption of Impact Fee Nexus Study and Updated School Facilities Fees in the Orange County Register Newspaper on January 6, 2023 which was at least 10 days prior to the adoption of this Resolution.

WHEREAS, on January 19, 2023, this Board passed Resolution No. 19-22-23, adopting the school facilities impact fee nexus study entitled “Residential and Commercial/Industrial Development School Fee Justification Study” (attached as Exhibit “A” and incorporated by reference herein and hereinafter referred to as the “Study”) dated December 15, 2022 prepared by its consultant Cooperative Strategies, LLC. The Study found the District’s school facilities impact costs to be as follows for residential developments:

Single Family Detached	\$4.57
Multifamily Attached	\$4.79

Furthermore, the Study found the District’s school facilities impact costs for commercial developments to be as follows:

Retail and Services	\$0.655
Office	\$0.78
Research and Development	\$0.78
Industrial/Warehouse/Manufacturing	\$0.78
Hospital	\$0.78
Hotel/Motel	\$0.332
Self-Storage	\$0.019

Therefore, it is appropriate at this time to update fees levied by the District as determined in the Study; and

WHEREAS, the State Allocation Board (“SAB”) determined the adjustment for inflation in the statewide cost index for Class B construction at its February 23, 2022 meeting, by which fees imposed under Education Code section 17620 may be changed; and

WHEREAS, this Board has conducted a public hearing on the issues referred to above at a duly noticed public meeting, during which this Board offered the opportunity for the public to comment on the Study and the proposed updated fees; the Study indicates that the District is overcrowded and that it

is both necessary and appropriate to continue levying fees under the authority of section 17620 in the amounts set forth above; and

WHEREAS, this Resolution updates, amends, and confirms prior resolutions on school facilities impact fees and updated fees to be assessed on residential, commercial, and industrial construction projects pursuant to Education Code section 17620.

NOW, THEREFORE, the Board of Education of the Orange Unified School District hereby resolves and declares as follows:

1. Based on its earlier Resolutions and pursuant to Education Code section 17621(a), this Board finds again that the levying of fees pursuant to Education Code section 17620 is exempt from the provisions of the California Environmental Quality Act (CEQA).

2. This Board recognizes that various categories of residential, commercial, or industrial construction as well as individual construction projects are or will be exempted from fees imposed under Education Code section 17620 by such statutory provisions as Education Code sections 17621, et seq., Government Code sections 50076, 65995, et seq., 66000, et seq., and judicial decisions.

3. In compliance with statutory and decisional law, and pursuant to Government Code sections 66008-66009 and Education Code sections 17621(e) and 35014, this Board has adopted the procedures, criteria, and definitions contained in this Board's "Resolution Regarding School Facilities Fees Exemption Procedures," as amended.

4. By adopting these criteria and procedures, this Board has ensured that no fees will be levied upon any individual construction project without the project's proponent being afforded an opportunity for individualized review by this Board of the propriety of imposing fees on that project and, as to commercial or industrial construction projects, for the findings required by Government Code section 66001(a) and (b) to be made on an individual project basis as provided in Education Code section 17621(e)(1).

5. Based on all of the above, the findings and evidence contained in the Board's earlier Resolutions on this subject, and the evidence presented to this Board at the hearing and in the Study, this Board confirms its earlier Resolutions, adopts the findings and conclusions set forth in the Study as its own, and finds each of the following:

(a) The purpose of the fees adopted and confirmed in this Resolution is to fund the construction or reconstruction of school facilities;

(b) These fees will be used to fund the construction or reconstruction of school facilities needed to reduce overcrowding which exists in the District and impairs the normal functioning of educational programs;

(c) The overcrowding to be reduced by use of these fees exists because the enrollment projected to result from continuing residential, commercial, or industrial construction exceeds the capacity of the District to provide adequate student housing;

(d) The amount of fees to be paid pursuant to this Resolution bears a reasonable relationship and is limited to the needs of the community for elementary or high school facilities

and is reasonably related and limited to the need for schools caused by residential, commercial, or industrial construction; and

(e) The amount of fees to be paid pursuant to this Resolution does not exceed the estimated reasonable costs of providing for the construction or reconstruction of school facilities necessitated by the construction projects from which the fees are to be collected.

6. Based on all of the above, the findings and evidence contained in the Board's earlier Resolutions on this subject, and the evidence presented to the Board at the hearing and in the Study, this Board adopts and levies the updated fees noted above per square foot of assessable space on all new residential construction and of all other residential construction within the boundaries of the District to the extent of any resulting increase in assessable space in excess of 500 square feet; or any lesser amount as may be determined pursuant to the procedures, criteria, and definitions contained in the Resolution referred to in 4 above.

7. Based on all of the above, the findings and evidence contained in the Board's earlier Resolutions on this subject, and the evidence presented to the Board at the hearing and in the Study, this Board adopts and levies the updated fees noted in Recital C above per square foot of all chargeable covered and enclosed space on any new commercial or industrial construction within the boundaries of the District not within a category expressly exempted by this Board in the Resolution referred to in 4 above or any lesser amount as may be determined pursuant to the procedures, criteria, and definitions contained in the Resolution referred to in 4 above.

8. This Board determines that the fees to be levied will be collected for public improvements or facilities for which an account has been established and funds appropriated, and for which this Board has adopted a proposed construction schedule or plan. Based on this determination, and pursuant to Government Code section 66007, this Board orders that payment of the fees specified above will be required prior to issuance of a building permit. This Board will review the facilities fee account every fiscal year, and if the District has unexpended or uncommitted fees within five (5) years of collection, this Board will either make the findings required by Government Code section 66001 or direct the refund of the fees.

9. Pursuant to Government Code section 65995(b)(3), these rates shall be updated each even numbered calendar year according to the adjustment for inflation set forth in the statewide cost index for Class B construction, or a lesser amount as determined by the State Allocation Board or the relevant School Facilities Impact Fee Justification Study.

10. This Board directs the Superintendent, or designee, to cause a copy of this Resolution to be delivered to the building official of the Cities and County within the School District's boundaries and the Department of Healthcare, Access and Information ("HCAI") (formerly known as the Office of Statewide Health Planning and Development) along with a copy of all the supporting documentation referenced herein and a map of the School District clearly indicating the boundaries thereof, advising the Cities, County, and HCAI that new residential and commercial/industrial development is subject to the Statutory School Fees adopted pursuant to this Resolution and requesting that no building permit or approval for occupancy be issued by any of these entities for any new residential development project, mobile home or manufactured home subject to the Statutory School Fees absent a certification from this School District of compliance of such project with the requirements of the Statutory School Fees, nor that any building permit be issued for any non-residential development absent a certification from this School District of compliance with the requirements of the applicable Statutory School Fees.

11. The Board further directs and authorizes the Superintendent to take further action on its behalf as necessary and appropriate to effectuate this Resolution.

ADOPTED, SIGNED AND APPROVED this 19th day of January, 2023

Rick Ledesma
President of the Governing Board for the
Orange Unified School District

I, Angie Rumsey , Clerk for the Governing Board of the Orange Unified School District, do hereby certify that the foregoing Resolution was adopted by the Governing Board of said District at a meeting of said Board held on the 19th day of January 2023, and that it was so adopted by the following vote:

AYES: _____
NOES: _____
ABSENT: _____
ABSTAIN: _____

Angie Rumsey
Clerk of the Governing Board for the
Orange Unified School District



► **RESIDENTIAL AND
COMMERCIAL/INDUSTRIAL
DEVELOPMENT SCHOOL FEE JUSTIFICATION
STUDY**

ORANGE UNIFIED SCHOOL DISTRICT

DECEMBER 15, 2022

Prepared For:

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**COOPERATIVE
STRATEGIES**

ASSESS • PLAN • FUND • BUILD

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EXHIBITS

EXHIBIT A:

Current SAB Form 50-02

EXHIBIT B:

Updated School Facilities Capacity Calculation

EXECUTIVE SUMMARY

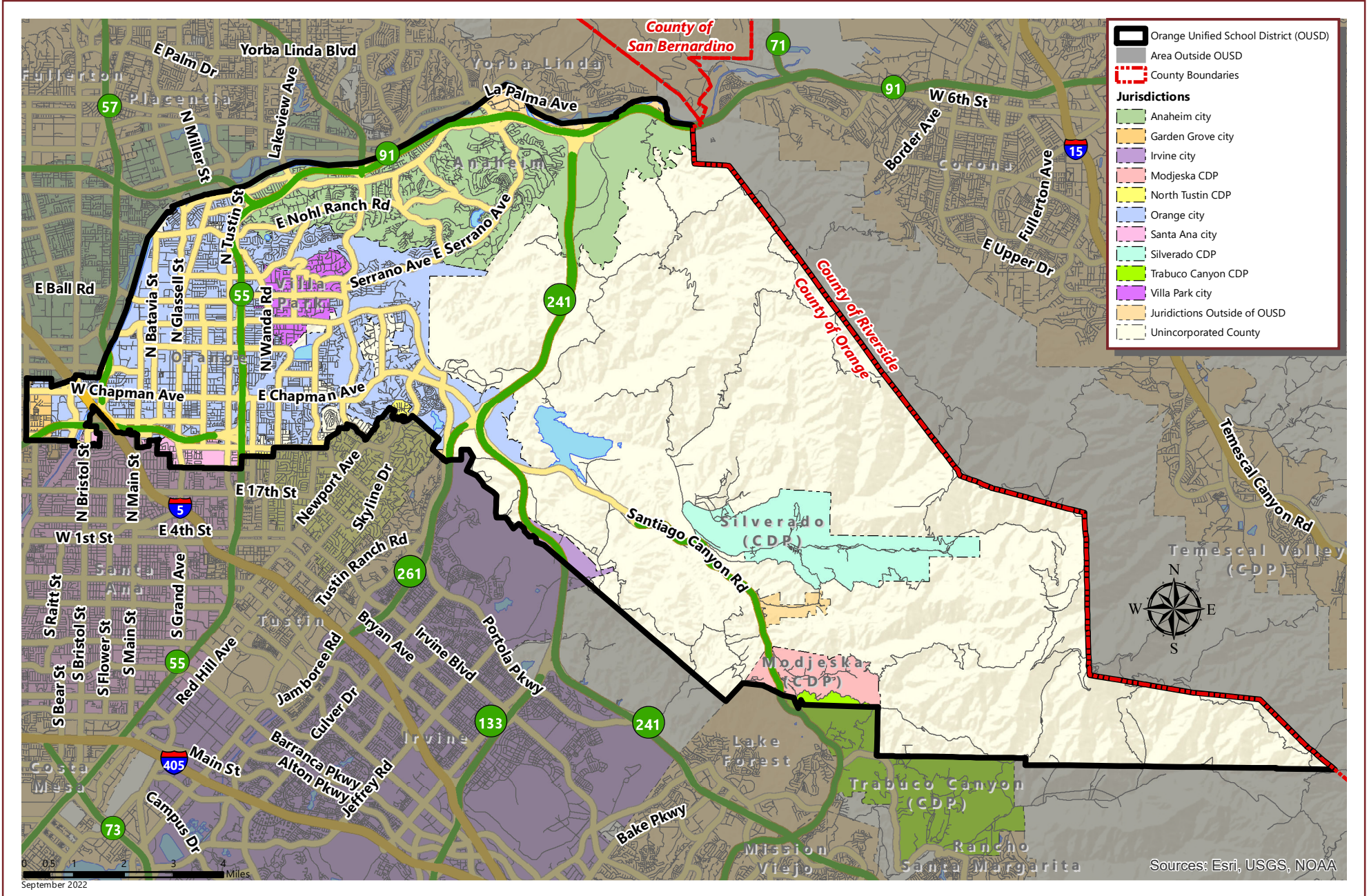
This Residential and Commercial/Industrial Development School Fee Justification Study ("Study") is intended to determine the extent to which a nexus can be established in the Orange Unified School District ("School District") between residential and commercial/industrial development ("CID") and (i) the need for school facilities, (ii) the cost of school facilities, and (iii) the amount of statutory school fees ("School Fees") per residential and CID building square foot that may be levied for schools pursuant to the provisions of Section 17620 of the Education Code, as well as Sections 65995 and 66001 of the Government Code, Assembly Bill ("AB") 181, and subdivision (e) of Section 17621 of the Education Code.

The School District provides education to students in grades transitional kindergarten ("TK") through 12 residing within the cities of Orange and Villa Park and portions of the cities of Anaheim, Garden Grove, Irvine, Santa Ana, and Tustin (collectively, "Cities") and a portion of the unincorporated County of Orange ("County") (please see map on following page for a geographic profile of the School District). Collectively, the School District's school facilities in school year 2022/2023 have a capacity of 30,194 students per Section 17071.10(a) of the Education Code. Of these 30,194 seats, 17,081 are at the elementary school level (i.e., grades TK through 6), 4,862 are at the middle school level (i.e., grades 7 and 8), and 8,251 are at the high school level (i.e., grades 9 through 12). This capacity includes seats from all new school facility construction projects funded by the State of California ("State"), and teaching stations purchased by the School District without State funding (see Exhibit A for SAB Form 50-02 and Exhibit B for an updated school facilities capacity calculation). Based on data provided by the School District, student enrollment is 25,747 in school year 2022/2023. Comparing student enrollment to facilities capacity reveals that facilities capacity exceeds student enrollment at the elementary school and middle school levels while student enrollment exceeds facilities capacity at the high school level in school year 2022/2023 (please see Section IV for more information on student enrollment and facilities capacity).

To establish a nexus and a justifiable residential School Fee level, the Study evaluated the number and cost of new facilities required to house students generated from future residential development within the School District. Based on data provided by the Center for Demographic Research ("CDR") approximately 8,333 additional residential units are expected be constructed within the School District's boundaries through calendar year 2040 ("Future Units"), of which 4,948 are expected to be single family detached ("SFD") units while 3,385 are expected to be multi-family attached ("MFA") units.

ORANGE UNIFIED SCHOOL DISTRICT

GEOGRAPHIC PROFILE



To determine the impact on the School District from Future Units, the Study first multiplied the number of Future Units by the student generation factors ("SGFs") calculated by Cooperative Strategies, to determine the projected student enrollment from Future Units. 987 unhoused high school students are anticipated to be generated from Future Units. These numbers include a reduction of the number of students projected to be housed by existing excess seats ("Projected Unhoused Students").

To adequately house the Projected Unhoused Students, the School District will need to expand existing high school facilities. Using design capacities of 27 students per classroom at the high school level, the School District will need to construct 37 new high school classrooms to accommodate the Projected Unhoused Students from the Future Units projected to be constructed at this time. The cost of expanding the existing high school facilities by adding additional teaching stations is estimated based on construction costs experienced by other school districts in the County. Additionally, the School District will also need to reconstruct and modernize its existing elementary school and middle school facilities. Based on modernization costs provided in the School District's Master Plan, Cooperative Strategies estimates a modernization cost \$41,762 per seat at the elementary and middle school levels.

In addition to the school facilities cost impacts, the School District will experience Central Administrative and Support Facilities cost impacts. In January 1994, the State Allocation Board ("SAB") approved a policy of four (4) square feet of Central Administrative and Support Facilities per student, which based on School District cost estimates equates to a per-student cost of \$800. Multiplying these costs by the facilities needed and the students generated yielded the total school facilities cost impacts shown in Table ES-1 on the following page.

TABLE ES - 1

**TOTAL SCHOOL FACILITIES COST IMPACTS FROM
FUTURE UNITS (2022\$)**

School Levels	Cost Per Teaching Station/Student	Teaching Stations Required/Students Generated	Total School Facilities Cost Impacts
High School	\$1,500,000	36.5556	\$54,833,400
Central Admin Impacts	\$800	987	\$789,600
ES Modernization	\$41,762	1,559	\$65,106,958
MS Modernization	\$41,762	482	\$20,129,284
Total	N/A	N/A	\$140,859,242

The amounts listed in Table ES-1 were apportioned to each land use class based on the number of students generated from such residential land use. Thereafter, the school facilities cost impacts for each land use class were divided by the number of Future Units to calculate the school facilities cost impacts per residential unit. Table ES-2 below lists the school facilities cost impacts per residential unit.

TABLE ES - 2

SCHOOL FACILITIES COST IMPACTS PER RESIDENTIAL UNIT (2022\$)

Land Use	Total School Facilities Cost Impacts	Future Units	School Facilities Cost Impacts per Residential Unit
Single Family Detached	\$78,315,976	4,948	\$15,828
Multi-Family Attached	\$62,543,266	3,385	\$18,477

To determine the school facilities cost impacts per square foot of residential construction, the school facilities cost impacts per unit were divided by the average square footage of a residential unit in each land use class. Table ES-3 on the following page lists the school facilities cost impacts per average residential square foot.

T A B L E E S - 3

**SCHOOL FACILITIES COST IMPACTS PER RESIDENTIAL SQUARE FOOT
(2022\$)**

Land Use	School Facilities Cost Impacts per Future Units	Average Square Footage	School Facilities Cost Impacts per Residential Square Foot
Single Family Detached	\$15,828	3,460	\$4.57
Multi-Family Attached	\$18,477	1,682	\$10.99

To determine the commercial/industrial School Fee levels that satisfy the rigorous nexus requirements of AB 181, the Study divides CID into seven (7) land use categories: retail and services, office, research and development, industrial/warehouse/ manufacturing, hospital, hotel/motel, and self-storage. The employment impacts of each of these land uses, in terms of the number of employees per 1,000 square feet of building space, are based on information from the San Diego Association of Governments ("SANDAG") pursuant to Section 17621 (e)(1)(B) of the Education Code. These employee impacts are shown in Table ES-4.

T A B L E E S - 4

EMPLOYMENT IMPACTS PER 1,000 SQUARE FEET CID

CID Land Use Category	Square Feet per Employee	Employees per 1,000 Square Feet
Retail and Service	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

Additional data from CDR, the U.S. Bureau of Census ("Census"), and CoreLogic provide a basis for estimating net school district household impacts. This number includes only those households occupying new housing units within the School District, as opposed to existing units whose previous occupants may have included school-aged children. Multiplying net school district households by (i) the number of students per household and (ii) total school facilities costs per student, results in estimates of school facilities cost impacts. Collectively, this calculation represents the total school facilities cost impacts per 1,000 square feet of commercial/industrial floor space, expressed in 2022 dollars. These results are summarized in Table ES-5.

T A B L E E S - 5

**GROSS SCHOOL FACILITIES COSTS IMPACTS
PER HOUSEHOLD (2022\$)**

School Level	Total Student Generation Impacts	Cost per Student	Gross School Facilities Costs Impacts per Unit
Elementary School	0.0041	\$41,762	\$171.22
Middle School	0.0013	\$41,762	\$54.29
High School	0.0033	\$56,356	\$185.97
Impact per Household	N/A	N/A	\$411.48

The revenue component of the Study estimates the potential fee revenues generated by CID, including residential fees paid by CID related households, as well as CID School Fees. CID related residential revenues are calculated based on the weighted average of the proposed residential School Fee of \$4.66 per square foot, justified in this study. The residential revenues per household are then subtracted from the impact per household listed above. This results in net impact per household, as summarized in Table ES-6 on the following page.

T A B L E E S - 6

NET SCHOOL FACILITIES COST IMPACTS PER HOUSEHOLD (2022\$)

Item	Amount
Impact per Household	\$411.48
Residential Revenue Per Household	\$118.71
Net School Facilities Cost Impacts Per Household	\$292.77

The net impact per household is then divided by the appropriate square feet per employee for each of the seven (7) CID land use categories to determine the cost impact per square foot of CID for each CID category, as shown in Table ES-7.

T A B L E E S - 7

SCHOOL FACILITIES COST IMPACTS PER SQUARE FOOT (2022\$)

School Level	Net Impact per Household	Square Feet per Employee	Cost Impact per Square Foot Of CID
Retail and Services	\$292.77	447	\$0.655
Office	\$292.77	286	\$1.024
Research and Development	\$292.77	329	\$0.890
Industrial/Warehouse/Manufacturing	\$292.77	371	\$0.789
Hospital	\$292.77	360	\$0.813
Hotel/Motel	\$292.77	883	\$0.332
Self-Storage	\$292.77	15,552	\$0.019

On February 23, 2022, the SAB increased the maximum Residential and CID School Fees authorized by Section 17620 of the Education Code from \$4.08 to \$4.79 per residential building square foot, and from \$0.66 to \$0.78 per CID square foot for unified school districts.

As shown in Table ES-3, the impact per residential square foot exceeds the maximum residential School Fee per square foot and, therefore, School Fees would provide for less than 100 percent of the school facilities cost impacts. The Study concludes that the School District is fully justified in levying the maximum residential School Fee of \$4.58 per square foot for all new SFD residential development and \$4.79 per square foot for all new MFA residential development within its boundaries subject to the limitations under the law, as shown in Table ES-8.

T A B L E E S - 8

MAXIMUM JUSTIFIED STATUTORY RESIDENTIAL FEE PER SQUARE FOOT (2022\$)

CID Land Use Category	Maximum School Fee
Single Family Detached	\$4.57
Multifamily Attached	\$4.79

Justification of the CID School Fee is based on a comparison of cost impacts per CID square foot, as shown in Table ES-7, against the maximum CID Fee per square foot as noted above. As shown in Table ES-9, the School District is justified in levying:

T A B L E E S - 9

MAXIMUM SCHOOL FEE PER SQUARE FOOT OF CID

CID Land Use Category	Maximum School Fee
Retail and Service	\$0.655
Office	\$0.780
Research and Development	\$0.780
Industrial/Warehouse/Manufacturing	\$0.780
Hospitals	\$0.780
Hotel/Motel	\$0.332
Self-Storage	\$0.019

I. INTRODUCTION

Senate Bill ("SB") 50, which Governor Wilson signed on August 27, 1998, was enacted on November 4, 1998, following the approval of Proposition 1A by the voters of the State in the general election on November 3, 1998. SB 50 includes provisions for the following:

1. Issuance of State general obligation bonds in an amount not to exceed \$9.2 billion;
2. Reformation of the State School Building Program; and
3. Reformation of the School Fee mitigation payment collection procedure.

Additionally, Assembly Bill ("AB") 16, which Governor Davis signed on April 26, 2002, was enacted following the approval of Proposition 47 ("Prop 47") by the voters of the State in the general election on November 5, 2002. Prop 47 includes the authorization for issuance of State general obligation bonds in the amount of \$13.05 billion, and AB 16 provides for additional reformation of the State School Building Program into the School Facilities Program. On March 2, 2004, the voters of the State approved Proposition 55 ("Prop 55"). Prop 55 includes the authorization for the additional issuance of State general obligation bonds in the amount of \$12.3 billion. Finally AB 127, which Governor Schwarzenegger signed on May 20, 2006, was enacted following the approval of Proposition 1D ("Prop 1D") by the voters of the State in the general election of November 7, 2006. Prop 1D includes the authorization for the issuance of State general obligation bonds in the amount of \$10.4 billion. On November 8, 2016, the voters of the State approved Proposition 51 ("Prop 51"). Prop 51 includes the authorization for the issuance of State general obligation bonds in the amount of \$9 billion.

The Mira-Hart-Murrieta Decisions, which formerly permitted school districts to seek mitigation payments in excess of School Fees under certain circumstances, are suspended by AB 127. In lieu of the powers granted by the Mira-Hart-Murrieta Decisions, SB 50 and subsequent legislation provide school districts with an alternative School Fee collection procedure that, subject to certain conditions, authorizes school districts to collect Alternative Fees on residential developments. However, not all school districts will qualify to charge Alternative Fees.

Therefore, school districts must still rely on School Fees as a funding source for school facilities required by new development. However, before a school district can levy School Fees on new development, State law requires that certain nexus findings must be made and documented. The objective of this Study is to provide a rigorous basis for such findings.

II. LEGISLATION

State legislation, specifically AB 2926 and AB 1600, provides guidelines, procedures, and restrictions on the levy of School Fees for school facilities. Certain provisions of this legislation are summarized below:

A. AB 2926

AB 2926 was enacted by the State in 1986. Among other things, AB 2926 added various sections to the Government Code which authorize school districts to levy School Fees on new residential and commercial/industrial developments in order to pay for school facilities. In addition, AB 2926 provides for the following:

1. No city or county can issue a building permit for a development project unless such School Fees have been paid.
2. School Fees for commercial/industrial development must be supported by the finding that such School Fees "are reasonably related and limited to the needs for schools caused by the development."
3. School Fees for 1987 were limited to \$1.50 per square foot on new residential construction and \$0.25 per square foot for new commercial/industrial construction.
4. Every year, School Fees are subject to annual increases based on the Statewide cost index for Class B construction, as determined by the SAB at its January meeting (This provision was changed to every other year by AB181).

The provisions of AB 2926 have since been expanded and revised by AB 1600.

B. AB 1600

AB 1600, which created Sections 66000 et seq. of the Government Code, was enacted by the State in 1987. AB 1600 requires that all public agencies satisfy the following requirements when establishing, increasing or imposing a fee as a condition of approval for a development project.

1. Determine the purpose of the fee.
2. Identify the facilities to which the fee will be put.

3. Determine that there is a reasonable relationship between the need for public facilities and the type of development on which a fee is imposed.
4. Determine that there is a reasonable relationship between the amount of the fee and the public facility or portion of the public facility attributable to the development on which the fee is imposed.
5. Provide an annual accounting of any portion of the fee remaining unexpended, whether committed or uncommitted, in the School District's accounts five or more years after it was collected.

In other words, AB 1600 limits the ability of a school district to levy School Fees unless (i) there is a need for the School Fee revenues generated and (ii) there is a nexus or relationship between the need for School Fee revenues and the type of development project on which the School Fee is imposed. (The requirements of AB 1600 were clarified with the passage in 2006 of AB 2751, which codifies the findings of *Shapell Industries vs. Milpitas Unified School District*.) The Study will provide information necessary to establish such a nexus between School Fees and residential development.

C. AB 181

AB 181, enacted by the State in 1989, made significant changes in several State Codes, including Sections 53080 et seq. of the Government Code which was re-codified as Sections 17620 et seq. of the Education Code on January 1, 1998. Changes in Section 53080 included additional requirements and procedures for imposing School Fees and other conditions on new development. Specifically, AB 181 imposes more stringent nexus requirements on school districts that wish to levy School Fees on CID, as follows:

1. In order to levy a School Fee on CID, a formal study must be conducted to determine the impact of "the increased number of employees anticipated to result" from new CID on the "cost of providing school facilities within the School District".
2. Only that portion of the School Fee justified by the "nexus findings" contained in this study may be levied. Nexus findings must be made on an individual project basis or on the basis of categories of CID and must "utilize employee generation estimates that are based on commercial/industrial factors within the school district."

Categories to be evaluated may include, but are not limited to, office, retail, transportation, communications and utilities, light industrial, heavy industrial, research and development, and warehouse uses.

- 3. Starting in 1990, maximum School Fees for residential and CID will be subject to increases every two (2) years rather than annually.
- 4. An appeals procedure shall be established whereby the levy of School Fees on a commercial/industrial project may be appealed to the governing board of a school district. Grounds for an appeal must include, but are not limited to, improper project classification by commercial/industrial category, or the application of improper or inaccurate employee or student generation factors to the project.

In summary, AB 181 establishes additional requirements which must be satisfied by school districts prior to their levying School Fees on CID.

III. METHODOLOGY OF STUDY

The School District is projecting an increase in student enrollment attributable to new development in future years. This projected growth will create a demand for new school facilities to be constructed within the School District and the need to incur significant school facilities costs to meet that demand. As a result, the School District has determined that School Fees should be levied on new development projects. The objective of the Study is to provide a basis for such findings consistent with the requirements of AB 2926, AB 1600, AB 181, and the provisions of Section 66001 of the Government Code.

A. RESIDENTIAL METHODOLOGY

The School District has determined that School Fees must be levied on new residential projects, if findings can be made that such projects will lead to higher student enrollment and increased facilities costs. In order to evaluate the existence of a nexus, the Study identifies and analyzes the various connections or linkages between residential development and (i) the need for school facilities, (ii) the cost of school facilities, and (iii) the amount of School Fees that can justifiably be levied. The primary linkages identified include the following:

1. Housing projections - The number of future residential units to be constructed within the boundaries of the School District.
2. Student generation - The number of students generated from a residential unit within the School District.
3. Facility requirements - The number of new school facilities required to house students generated from new residential units
4. School facilities cost impacts - The costs to the School District associated with the construction of new school facilities.
5. School Fee requirements – The School District's need to levy School Fees to cover the cost of new school facilities.

The above linkages result in a series of impacts which (i) connect new residential development with increased school facilities costs and (ii) connect School Fees per residential building square foot with increased facilities costs.

B. COMMERCIAL/INDUSTRIAL METHODOLOGY

The School District has also determined that School Fees must be levied on new CID projects. In order to determine the nexus relationships identified in AB 181, the Study analyzes the various linkages between CID and (i) the need for school facilities, (ii) the cost of school facilities, and (iii) the amount of the School Fee that can justifiably be levied. The primary connections or linkages include the following:

- 1. Job creation (i.e., new CID within the School District creates new jobs);
- 2. Household formation (i.e., job creation within the School District leads to the formation of new households in the School District);
- 3. Student generation (i.e., household formation within the School District generates new students);
- 4. Facilities requirements (i.e., student generation within the School District leads to the need to incur additional costs for new school facilities); and
- 5. School Fee requirements (i.e., additional costs for new school facilities within the School District leads to the need to levy School Fees for new development).

The above linkages result in a series of impacts which (i) connect new CID with increased school facilities costs and (ii) connect increased school facilities costs with School Fees on CID buildings. These impacts are identified for different CID land use categories, based on a "prototypical unit" of 1,000 square feet of new commercial or industrial floor space for each category. These "linkage impacts" include five (5) major types:

- 1. Employment Impacts
- 2. Household Impacts
- 3. Student Generation Impacts
- 4. School Facilities Cost Impacts
- 5. Fee Revenues

The nature and components of these impacts are summarized in Section III.C, along with the key assumptions and data sources used in estimating their magnitude.

Analysis of the first four (4) linkage impacts provides an estimate of the gross school facilities cost impacts per 1,000 square feet of floor space for each CID category. Analysis and comparison of all five (5) impacts provide an estimate of (i) net school facilities cost impacts (i.e., gross school facilities cost impacts minus residential revenues) per 1,000 square feet of CID floor space and (ii) the maximum commercial/industrial School Fee that can be justified.

C. COMMERCIAL/INDUSTRIAL LAND USE CATEGORIES

Linkage impacts are analyzed for the following CID land use categories:

- 1. Retail and Services
- 2. Office
- 3. Research and Development
- 4. Industrial/Warehouse/Manufacturing
- 5. Hospital
- 6. Hotel/Motel
- 7. Self-Storage

RETAIL AND SERVICES

The retail and services category includes commercial establishments which sell general merchandise, building materials, hard goods, apparel, and other items and services to consumers. Additional establishments in the retail and services category include nurseries, discount stores, restaurants, entertainment theme parks, new/used car sales facilities, service stations, supermarkets, banks, real estate sales offices, and similar uses.

OFFICE

A general office building houses one (1) or more tenants and is the location where affairs of a business, commercial or industrial organization, professional person or firm are conducted. The building or buildings may be limited to one (1) tenant, either the owner or lessee, or contain a mixture of tenants including professional services, insurance companies, investment brokers, company headquarters, and services for the tenants such as a bank or savings and loan, a restaurant or cafeteria, and service retail and services facilities. There may be large amounts of space used for file storage or data processing.

The office category may also include medical offices that provide diagnoses and outpatient care on a routine basis, but which are unable to provide prolonged in-house medical/surgical care. A medical office is generally operated by either a single private physician or a group of doctors.

RESEARCH AND DEVELOPMENT

Research and development facilities are those primarily associated with the application of scientific research to the development of high technology products. Areas of concentration include materials, science, computer, electronic, and telecommunications products. Facilities may also contain offices and fabrication areas. Activities performed range from pure research to product development, testing, assembly, and distribution.

INDUSTRIAL/WAREHOUSE/MANUFACTURING

Warehouses are facilities that are primarily devoted to the storage of materials. They may also include office and maintenance areas. This category also includes buildings in which a storage unit or vault is rented for the storage of goods.

Manufacturing facilities are building structures where the primary activity is the conversion of raw materials or parts into finished products. Size and type of activity may vary substantially from one facility to another. In addition to actual production of goods, manufacturing facilities generally have office, warehouse, research and associated functions. This category includes light industrial facilities such as printing plants, material testing laboratories, assemblers of data processing equipment, and power stations.

HOSPITAL

Hospital refers to any institution where medical or surgical care is given to non-ambulatory and ambulatory patients. The term does not however, refer to medical clinics (facilities that provide diagnoses and outpatient care only) or to nursing homes (facilities devoted to the care of persons unable to care for themselves).

HOTEL/MOTEL

Hotels and motels are commercial establishments primarily engaged in providing lodging, or lodging and meals, for the general public. As defined by Government Code Section 65995(d), the hotel/motel category includes, but is not limited to, any hotel, motel, inn, tourist home, or other lodging for which the maximum term of occupancy does not exceed 30 days.

It does not, however, include any residential hotel as defined by Section 50519(b)(1) of the Health and Safety Code.

SELF-STORAGE

This category includes buildings in which a storage unit or vault is rented for the storage of goods and/or personal materials. This category may also include office areas associated with storage.

Note that CID land use categories may include different industry types. For example, firms in the transportation, communications, or utilities industries may be classified in up to six (6) of the seven (7) land use categories shown above. Similarly, retail firms may also occupy office or industrial space (e.g., for corporate headquarters or warehousing) and manufacturing firms may occupy retail space (e.g., factory retail outlets). In evaluating any given project, the School District should assign the project to whichever CID category is the predominant use within the project.

IV. FACILITIES CAPACITY AND STUDENT ENROLLMENT

In order to determine whether the School District's existing school facilities contain excess capacity to house students generated by new residential and CID development, school year 2022/2023 student enrollment and school facilities capacity of the School District were evaluated.

Collectively, the School District's school facilities in school year 2022/2023 have a capacity of 30,194 students per Section 17071.10(a) of the Education Code. This capacity includes seats from all new school facility construction projects funded by the State and teaching stations purchased by the School District without State funding (see Exhibit A for SAB Form 50-02 and Exhibit B for an updated school facilities capacity calculation). Of these 30,194 existing seats, 17,081 are at the elementary school level, 4,862 are at the middle school level, and 8,251 are at the high school level. (The school level configuration of the School District has been altered to be consistent with the SAB Form 50-02.) The enrollment of the School District in school year 2022/2023 is 25,747 students. As shown in Table 1 below, the School District's facilities capacity exceeds student enrollment at elementary and middle school levels while student enrollment exceeds facilities capacity at the high school level in school year 2022/2023.

T A B L E 1

EXISTING SCHOOL FACILITIES CAPACITY AND STUDENT ENROLLMENT

School Level	2022/2023 Facilities Capacity	2022/2023 Student Enrollment	Excess/ (Shortage) Capacity
Elementary School (Grades TK-6)	17,081	13,171	3,910
Middle School (Grades 7-8)	4,862	4,072	790
High School (Grades 9-12)	8,251	8,504	(253)
Total	30,194	25,747	4,447

As indicated in Table 1, 3,910 elementary school seats and 790 middle school seats are available to house students generated from Future Units. These surplus seats will be addressed in Section V. Additionally, due to the age of the School District’s facilities and their current state, the School District will need to perform significant reconstruction and modernization of its existing school facilities to adequately house students in the future. These reconstruction needs will be discussed in Section V.E.

V. IMPACT OF RESIDENTIAL DEVELOPMENT ON SCHOOL FACILITIES NEEDS

As discussed in Section III, the objective of the Study is to determine the appropriateness of the imposition of a School Fee to finance school facilities necessitated by students to be generated from new residential development. Section III outlined the methodology which was employed in the Study to meet that objective. Section V is a step-by-step presentation of the results of the analysis.

A. PROJECTED RESIDENTIAL DEVELOPMENT WITHIN THE SCHOOL DISTRICT

The initial step in developing a nexus as required by AB 2926 and AB 1600 is to determine the number of Future Units to be constructed within the School District's boundaries. Based on information provided by CDR, the School District expects the construction of approximately 8,333 Future Units through calendar year 2040 of which 4,948 are expected to be SFD units while 3,385 are expected to be MFA units. Table 2 distinguishes between mitigated and Future Units by land use.

TABLE 2
FUTURE UNITS

Land Uses	Total Future Units
Single Family Detached	4,948
Multi-Family Attached	3,385
Total Units	8,333

B. RECONSTRUCTION

Reconstruction is the act of replacing existing structures with new construction, which may have an alternative land use (i.e., commercial/industrial versus residential) or may consist of different residential unit types (i.e., SFD versus MFA, etc.).

B1. RESIDENTIAL RECONSTRUCTION

Residential Reconstruction consists of voluntarily demolishing existing residential units and replacing them with new residential development.

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 School District to provide school facilities for new student enrollment.

Prior to the imposition of fees on Replacement Square Footage, the School District shall undertake an analysis on any future proposed projects(s) to examine the extent to which an increase in enrollment can be expected from Replacement Square Footage due to any differential in SGFs as identified in the Study for the applicable unit types between existing square footage and 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.

B2. RECONSTRUCTION OF COMMERCIAL/INDUSTRIAL CONSTRUCTION INTO RESIDENTIAL CONSTRUCTION

The voluntary demolition of existing commercial/industrial buildings and replacement of them with new residential development is a different category of Reconstruction. Cooperative Strategies is aware that such types of Reconstruction may occur within the School District in the future, however, Cooperative Strategies was unable to find information (i) about the amount planned within the School District in the future or (ii) historical levels, which might indicate the amount to be expected in the future.

Due to the lack of information, the School 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.

C. STUDENT GENERATION FACTORS PER RESIDENTIAL UNIT

In order to analyze the impact on the School District’s student enrollment from Future Units, Cooperative Strategies calculated SGFs for SFD and MFA units. The process of determining SGFs involved cross-referencing the School District’s enrollment data against the County Assessor residential data.

Sorting and extracting the County Assessor records by land use, Cooperative Strategies developed a database of 44,949 SFD units. This database was then compared with the School District's student enrollment database to identify address matches. Upon comparison of the two (2) databases, 13,762 student matches were found, resulting in the SGFs shown in Table 3.

T A B L E 3
STUDENT GENERATION FACTORS FOR SINGLE FAMILY DETACHED UNITS

School Level	Students Matched	Single Family Detached Units	Student Generation Factors
Elementary School	7,081	44,949	0.1575
Middle School	2,063	44,949	0.0459
High School	4,618	44,949	0.1027
Total	13,762	N/A	0.3061

A procedure identical to the one used in calculating the SGFs for SFD units was used to determine SGFs for MFA units. A total of 8,128 students matched to the MFA database which consisted of 22,680 units. The resulting SGFs for MFA units are shown in Table 4.

T A B L E 4
STUDENT GENERATION FACTORS FOR MUTLI-FAMILY ATTACHED UNITS

School Level	Students Matched	Multi-Family Attached Units	Student Generation Factors
Elementary School	4,222	22,680	0.1862
Middle School	1,264	22,680	0.0557
High School	2,642	22,680	0.1165
Total	8,128	N/A	0.3584

However, due to incomplete and incorrect address information in both the student enrollment and residential databases, Cooperative Strategies was unable to match all of the School District's students. The results are SGFs that understate the number of students generated by SFD and MFA units. After accounting for incoming interdistrict students that reside outside of the School District's boundaries, there were 2,480 unmatched students. Therefore, Cooperative Strategies adjusted the SGFs listed in Tables 3 and 4 based on a rate which considers the number of students successfully matched to a school level and land use, as shown in Table 5.

**T A B L E 5
ADJUSTED STUDENT GENERATION FACTORS**

School Levels	Single Family Detached Units	Multi-Family Attached Units
Elementary School	0.1743	0.2059
Middle School	0.0532	0.0646
High School	0.1123	0.1273
Total	0.3398	0.3978

D. SCHOOL DISTRICT FACILITIES REQUIREMENTS

By multiplying the Future Units as listed in Table 2 by the SGFs identified in Table 5, the Study determined the projected number of new students to be generated from Future Units. The Projected Student Enrollment by school level is shown in Table 6.

**T A B L E 6
PROJECTED STUDENT ENROLLMENT FROM FUTURE UNITS**

School Level	Projected Student Enrollment from Future SFD Units	Projected Student Enrollment from Future MFA Units	Projected Student Enrollment from Future Units
Elementary School	677	673	1,350
Middle School	207	211	418
High School	436	416	852
Total	1,320	1,300	2,620

As indicated in Section IV, 3,910 surplus elementary school seats and 790 surplus middle school seats are available to accommodate the Projected Student Enrollment. Therefore, the Projected Unhoused Students are less than the Projected Student Enrollment at the elementary and middle school levels. Table 7 shows Projected Unhoused Students for the School District.

T A B L E 7

PROJECTED UNHOUSED STUDENTS FROM FUTURE UNITS

School Levels	Projected Students from Future Units	Surplus Seats	Projected Unhoused Students
Elementary School	1,559	3,910	0
Middle School	482	790	0
High School	987	0	987
Total	3,028	4,700	987

To determine the number of high school facilities necessary to adequately house the Projected Unhoused Students, Cooperative Strategies divided the Projected Unhoused Students by the estimated school facilities capacity at each school level, as provided by the School District. The additional school facilities requirements are identified in Table 8.

T A B L E 8

ADDITIONAL SCHOOL FACILITIES FOR PROJECTED UNHOUSED STUDENTS

School Levels	Projected Unhoused Students	Estimated Teaching Station Capacity	Additional Teaching Stations Needed
High School	987	27	36.5556

E. SCHOOL DISTRICT FACILITIES COSTS

The cost of expanding the existing high school facilities by adding additional teaching stations is estimated based on based on construction costs experienced by other school districts in the County.

It must be noted that the facilities costs are in 2022 dollars and do not include interest costs associated with debt incurred to finance the construction of facilities. The estimated site costs and facility construction costs by school level are shown in Table 9.

T A B L E 9
ESTIMATED SCHOOL FACILITIES COSTS (2022\$)

School Levels	Estimated Total Cost per Teaching Station
Elementary School	N/A
Middle School	N/A
High School	\$1,500,000

As mentioned in Section IV, due to the age of the existing school facilities and their current state, the School District will need to perform significant reconstruction and modernization at the elementary and middle levels in order to adequately serve students in the future.

In order to determine the reconstruction impact of students generated from Future Units, Cooperative Strategies divided total reconstruction cost estimates by the total capacity for each school to be modernized. Based on cost estimates provided in the School District’s Master Plan, reconstruction and modernization of the School District’s elementary school, K-8 school, and middle school facilities will have an estimated total cost of \$878,671,000. Only the proportion of reconstruction costs attributable to the projected student enrollment expected to occupy the available capacity is used to calculate the School Fees.

In order to determine the reconstruction impact of students generated from Future Units, Cooperative Strategies divided total reconstruction cost estimates by the total capacity for each school to be modernized. Cooperative Strategies estimates reconstruction and modernization costs to be \$41,762 per seat at the elementary school and middle school levels.

The costs in Table 9 do not include costs associated with Central Administrative and Support Facilities. As indicated in Table 7, Future Units will cause the enrollment of the School District to increase by approximately 987 students.

In accordance with the Provisions of Chapter 341, Statutes of 1992, SB 1612, the SAB adopted a report on January 26, 1994, requiring approximately four (4) square feet of central administrative and support facilities for every student. Based on this report and the estimated cost per square foot to construct and furnish these types of facilities, the Study incorporates a Central Administrative and Support Facilities cost impact of \$800 per student.

F. TOTAL SCHOOL FACILITIES COST IMPACTS

To determine the total school facilities cost impacts caused by Future Units, Cooperative Strategies (i) multiplied the school facilities costs (Table 9) by the additional school facilities needed (Table 8) and (ii) multiplied the central administrative and support facilities costs per student (above paragraph) by the Projected Unhoused Students (Table 7). Table 10 illustrates the total school facilities cost impacts from future residential development.

T A B L E 1 0
**TOTAL SCHOOL FACILITIES COST IMPACTS FROM
FUTURE UNITS (2022\$)**

School Levels	Cost Per Teaching Station/Student	Teaching Stations Required/Students Generated	Total School Facilities Cost Impacts
High School	\$1,500,000	36.5556	\$54,833,400
Central Admin Impacts	\$800	987	\$789,600
ES Modernization	\$41,762	1,559	\$65,106,958
MS Modernization	\$41,762	482	\$20,129,284
Total	N/A	N/A	\$140,859,242

G. SCHOOL FACILITIES COST IMPACTS PER RESIDENTIAL UNIT

To determine the total school facilities cost impacts per future residential unit, the total school facilities cost impacts listed above need to first be apportioned by land use based on the number of elementary, middle, and high school students to be generated from such land use. Table 11 on the following page shows total school facilities cost impacts by land use.

T A B L E 1 1

TOTAL SCHOOL FACILITIES COST IMPACTS BY LAND USE (2022\$)

School Level	Single Family Detached Units	Multi-Family Attached Units	Total School Facilities Cost Impacts
Elementary School	\$35,998,844	\$29,108,114	\$65,106,958
Middle School	\$10,983,406	\$9,145,878	\$20,129,284
High School	\$31,333,726	\$24,289,274	\$55,623,000
Total	\$78,315,976	\$62,543,266	\$140,859,242

Total school facilities cost impacts for each land use were then divided by the number of Future Units in such land use to determine school facilities cost impacts per SFD unit and MFA unit. These impacts are shown in Table 12.

T A B L E 1 2

SCHOOL FACILITIES COST IMPACTS PER FUTURE UNIT (2022\$)

Land Uses	Total School Facilities Cost Impacts	Future Units	School Facilities Cost Impacts per Residential Unit
Single Family Detached	\$78,315,976	4,948	\$15,828
Multi-Family Attached	\$62,543,266	3,385	\$18,477

H. SCHOOL FACILITIES COST IMPACTS PER SQUARE FOOT

To determine the school facilities cost impacts per square foot of residential construction for each land use, the school facilities cost impacts per unit listed in Table 12 were divided by the average square footage of such type of residential unit.

Using square footage information for units constructed within the School District obtained from ParcelQuest, Cooperative Strategies estimates that the average square footage of an SFD unit in the School District is projected to be 3,460 square feet while the average square footage of an MFA unit is projected to be 1,682 square feet. Table 13 shows the school facilities cost impacts per square foot of residential construction in the School District.

T A B L E 1 3

SCHOOL FACILITIES COST IMPACTS PER RESIDENTIAL SQUARE FOOT (2022\$)

Land Uses	School Facilities Cost Impacts per Residential Unit	Average Square Footage	School Facilities Cost Impacts per Square Foot
Single Family Detached	\$15,828	3,460	\$4.57
Multi-Family Attached	\$18,477	1,682	\$10.99

VI. IMPACT OF COMMERCIAL/INDUSTRIAL DEVELOPMENT ON SCHOOL FACILITIES NEEDS

This section presents the quantitative findings of the commercial/industrial nexus analysis summarized in Section III. In particular, this section presents estimates of the following:

1. All "linkage impacts" discussed in Section III, by CID land use category.
2. Gross school facilities cost impacts per 1,000 square feet of commercial/industrial floor space.
3. Net school facilities cost impacts (i.e., gross school facility cost impacts minus residential revenues) per 1,000 square feet of commercial/industrial floor space.
4. The percentage of the maximum CID School Fee per square foot allowed by law that can be justified to pay for new school facilities.

A. EMPLOYMENT IMPACTS

As indicated in Section III, employment impacts for different CID categories equal the estimated number of on-site employees generated per 1,000 square feet of commercial/industrial floor space, which are referred to in the Study as CID Land Use Categories. Consistent with the provisions of Section 17621(e)(1)(B) of the Education Code, employment impacts for each category are based on data from SANDAG. The employment impacts are shown in Table 14 on the following page.

T A B L E 1 4

EMPLOYMENT IMPACTS PER 1,000 SQUARE FEET (2022\$)

CID Land Use Category	Square Feet per Employee
Retail and Services	447
Office	286
Research and Development	329
Industrial/Warehouse/Manufacturing	371
Hospital	360
Hotel/Motel	883
Self-Storage	15,552

B. HOUSEHOLD IMPACTS

As noted in Section III, household impacts equal the estimated number of households associated with each category of employment impacts, per 1,000 square feet of commercial/industrial floor space. Household impacts include the following components:

1. Households per Employee

The average number of households per employee are calculated based on information obtained from the Census. Based on this information, the total household impacts are 0.6209 households per employee within the School District.

2. Employed Persons Living within the School District

In order to determine the number of employed persons who live within the School District, Cooperative Strategies utilized data from the Census. Based on this data, approximately 27.46 percent of the employed persons within the School District are estimated to live within the School District. This trend is expected to increase as new residential and CID projects are approved and additional homes and jobs are created within the School District.

3. Propensity to Occupy New Homes

The propensity to occupy new housing within the general area of the School District helps determine the number of employees generated from new homes. Based on data on recent resales and new home sales obtained from CoreLogic, new home sales in the School District are estimated to equal 5.48 percent of the total housing units which will experienced occupant turnover in the future.

4. Total Household Impact

In order to determine the Total Household Impact of new residential units, the Study multiplied the average employed persons per household, employed person living within the School District, and the propensity to occupy new homes. This helps determine the number of new employees coming to live and work within the School District produced by new residential development, as shown in Table 15.

T A B L E 1 5

TOTAL HOUSEHOLD IMPACTS FROM NEW CID

Household Impact	Factor
Households per Employees	0.6209
Employees Living within the School District	27.46%
Households with Employees Working within the School District	0.1705
Propensity to Occupy New Homes	5.48%
Total Household Impacts	0.0093

C. STUDENT GENERATION IMPACTS

As noted in Section III, student generation impacts equal the number of the School District's students associated with each category of CID space. Separate student generation impacts are estimated for each CID category and school level.

1. RESIDENTIAL STUDENT GENERATION IMPACTS

In order to analyze household formation as a result of new CID, the SGFs shown in Table 5 must be blended. To blend the SGFs of the two (2) land uses into a single SGF for each school level, the land uses were weighted in proportion to each type's percentage of the future residential units to be constructed within the School District. Applying these weighting factors yields the following blended SGFs shown in Table 16.

T A B L E 1 6

BLENDED STUDENT GENERATION FACTORS

School Level	Student Generation Factors
Elementary School	0.1871
Middle School	0.0578
High School	0.1184

2. TOTAL STUDENT GENERATION IMPACTS

Multiplying total household impacts shown in Table 15 by the blended SGFs shown in Table 16 results in the average student generation impacts. These average student generation impacts are shown by school level in Table 17.

T A B L E 1 7

AVERAGE STUDENT GENERATION IMPACTS

School Level	Student Generation Factors	Total Household Impacts	Average Student Generation Impacts
Elementary School	0.1871	0.0093	0.0017
Middle School	0.0578	0.0093	0.0005
High School	0.1184	0.0093	0.0011

D. INTER-DISTRICT TRANSFER IMPACTS

The Study also evaluates the impact of students attending the School District on an inter-district transfer basis. The inter-district transfer rate is determined by calculating the ratio of student transfers into the School District's schools by the number of persons employed within its boundaries. Based on information provided by the School District, total student transfers into the School District's schools for school year 2022/2023 total 310 at the elementary school level, 103 at the middle school level, and 289 at the high school level. Employment within the School District's area is estimated at 129,151 persons based on employment estimates provided by CDR. Table 18 shows the inter-district transfer impacts by school level.

T A B L E 1 8

INTER-DISTRICT TRANSFER IMPACTS

School Level	Inter-District Transfer Impacts
Elementary School	0.0024
Middle School	0.0008
High School	0.0022

E. TOTAL STUDENT GENERATION IMPACT

To determine the total student generation impacts of CID on the School District, the average student generation impacts from Table 17 are added to the inter-district transfer impacts from Table 18. The resulting total student generation impacts are displayed in Table 19.

T A B L E 1 9

TOTAL STUDENT GENERATION IMPACTS

School Level	Average Student Generation Impacts	Inter-District Transfer Impacts	Total Student Generation Impacts
Elementary School	0.0017	0.0024	0.0041
Middle School	0.0005	0.0008	0.0013
High School	0.0011	0.0022	0.0033

F. GROSS SCHOOL FACILITIES COST IMPACTS

As noted in Section III, school facilities cost impacts equal the gross school facilities cost impacts (exclusive of residential revenues) associated with the total student generation impact of each CID category.

1. SCHOOL FACILITIES COSTS PER STUDENT

The school facilities costs per student are the average cost impact produced by students generated from Future Units. This impact estimate is derived from the school facilities costs (Table 11) divided by the Projected Student Enrollment from Future Units (Table 7) by school level. Multiplying the total student generation impacts by the school facilities costs per student results in the gross school facilities cost impacts shown in Table 20.

T A B L E 2 0

GROSS SCHOOL FACILITIES COSTS IMPACTS PER HOUSEHOLD (2022\$)

School Level	Total Student Generation Impacts	Cost per Student	Gross School Facilities Costs Impacts per Household
Elementary School	0.0041	\$41,762	\$171.22
Middle School	0.0013	\$41,762	\$54.29
High School	0.0033	\$56,356	\$185.97
Total	N/A	N/A	\$411.48

G. FEE REVENUES

As noted in Section III, fee revenues include two (2) components: residential revenues and potential CID School Fee revenues.

1. RESIDENTIAL REVENUES AND NET SCHOOL FACILITY COSTS

Residential revenues equal the maximum revenues from residential development associated with each school level. These revenues are derived from the School District's weighted average proposed School Fee of \$4.67 per square foot multiplied by the School District's weighted average square footage for residential units of 2,647 square feet. Based on this calculation, the residential revenues per unit in the School District are estimated to be \$12,765. Multiplying the total household impact shown in Table 15 by residential revenues results in the residential revenues per student shown in Table 21.

T A B L E 2 1

RESIDENTIAL REVENUES PER HOUSEHOLD (2022\$)

Item	Amount
Revenue per Residential Unit	\$12,765
Total Household Impact	0.0093
Residential Revenue per Household	\$118.71

2. NET SCHOOL FACILITIES COST IMPACTS

In order to calculate the net school facilities cost impacts per grade level, the residential revenues shown in Table 21 were subtracted from the gross school facilities cost impacts shown in Table 20. The results are the net school facilities cost impacts that must be funded by CID School Fees, as shown in Table 22.

T A B L E 2 2

**NET SCHOOL FACILITIES COST IMPACTS
PER HOUSEHOLD (2022\$)**

Item	Amount
Gross School Facilities Cost Impacts per Household	\$411.48
Residential Revenue per Household	\$118.71
Net School Facilities Cost Impacts per Household	\$292.77

H. JUSTIFICATION OF COMMERCIAL/INDUSTRIAL SCHOOL FEES

Dividing net school facilities cost impacts shown in Table 22 by total the square feet per employee for each land use category, as shown in Table 14, results in the CID impacts shown in Table 23.

T A B L E 2 3

SCHOOL FACILITIES COST IMPACTS PER SQUARE FOOT (2022\$)

CID Land Use Category	Net Impact per Household	Square Feet per Employee	Cost Impact per Square Foot Of CID
Retail and Services	\$292.77	447	\$0.655
Office	\$292.77	286	\$1.024
Research and Development	\$292.77	329	\$0.890
Industrial/Warehouse/Manufacturing	\$292.77	371	\$0.789
Hospital	\$292.77	360	\$0.813
Hotel/Motel	\$292.77	883	\$0.332
Self-Storage	\$292.77	15,552	\$0.019

VII. CONCLUSION

On February 23, 2022, the SAB increased the maximum Residential and CID School Fees authorized by Section 17620 of the Education Code from \$4.08 to \$4.79 per residential building square foot, and from \$0.66 to \$0.78 per CID square foot for unified school districts.

This section summarizes the findings of the Study for new residential and commercial/industrial construction within the School District. In particular, this section summarizes the following:

1. RESIDENTIAL FEES

As shown in Table 13, the impact per residential square foot exceeds the maximum residential School Fee of \$4.79 per square foot and, therefore, School Fees would provide for less than 100 percent of the school facilities cost impacts. The Study concludes that the School District is fully justified in levying the maximum residential School Fee of \$4.57 per square foot for all new SFD residential development and \$4.79 per square foot for all new non-mitigated MFA residential development within its boundaries, subject to the limitations under the law. Based on this information, the School District is justified in charging the Statutory Fee Amounts per square foot shown in Table 24 on new residential construction:

T A B L E 2 4

MAXIMUM JUSTIFIED STATUTORY RESIDENTIAL FEE PER SQUARE FOOT (2022\$)

Item	Residential Fee per Square Foot
Single Family Detached	\$4.57
Multifamily Attached	\$4.79

2. COMMERCIAL/INDUSTRIAL FEES

As shown in Table 23, the impact per CID square foot exceeds the maximum CID School Fee of \$0.78 per square foot for some CID land use categories. The Study concludes that the School District is fully justified in levying the maximum CID School Fee of \$0.78 per square foot for all CID land use categories.

Based on this information, the School District is justified in charging the Statutory Fee Amounts per square foot shown in Table 25 on new CID construction:

T A B L E 2 5
**MAXIMUM JUSTIFIED STATUTORY CID FEE
PER SQUARE FOOT (2022\$)**

CID Land Use Category	CID Fee per Square Foot
Retail and Services	\$0.655
Office	\$0.780
Research and Development	\$0.780
Industrial/Warehouse/Manufacturing	\$0.780
Hospital	\$0.780
Hotel/Motel	\$0.332
Self-Storage	\$0.019

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EXHIBIT A

CURRENT SAB FORM 50-02

STATE OF CALIFORNIA
EXISTING SCHOOL BUILDING CAPACITY

SAB 50-02 (Rev. 01/01) Excel (Rev. 01/25/2001)

SCHOOL DISTRICT
 ORANGE UNIFIED

FIVE DIGIT DISTRICT CODE NUMBER (see California Public School Directory)

66621

HIGH SCHOOL ATTENDANCE AREA (if applicable)

NGE

PART I - Classroom Inventory NEW ADJUSTED

	K-6	7-8	9-12	Non-Severe	Severe	Total
Line 1. Leased State Relocatable Classrooms						
Line 2. Portable Classrooms leased less than 5 years	13					13
Line 3. Interim Housing Portables leased less than 5 years	10					10
Line 4. Interim Housing Portables leased at least 5 years						
Line 5. Portable Classrooms leased at least 5 years						
Line 6. Portable Classrooms owned by district	117	14	74			205
Line 7. Permanent Classrooms	546	154	202	54	21	977
Line 8. Total (Lines 1 through 7)	686	168	276	54	21	1,205

PART II - Available Classrooms

Option A

	K-6	7-8	9-12	Non-Severe	Severe	Total
a. Part I, line 4						
b. Part I, line 5						
c. Part I, line 6	117	14	74			205
d. Part I, line 7	546	154	202	54	21	977
e. Total (a, b, c, & d)	663	168	276	54	21	1,182

Option B

	K-6	7-8	9-12	Non-Severe	Severe	Total
a. Part I, line 8	686	168	276	54	21	1,205
b. Part I, lines 1,2,5 and 6 (total only)						218
c. 25 percent of Part I, line 7 (total only)						245
d. Subtract c from b (enter 0 if negative)						
e. Total (a minus d)	686	168	276	54	21	1,205

PART III - Determination of Existing School Building Capacity

	K-6	7-8	9-12	Non-Severe	Severe
Line 1. Classroom capacity	16,575	4,536	7,452	702	189
Line 2. SER adjustment					
Line 3. Operational Grants					
Line 4. Greater of line 2 or 3					
Line 5. Total of lines 1 and 4	16,575	4,536	7,452	702	189

I certify, as the District Representative, that the information reported on this form is true and correct and that:
 I am designated as an authorized district representative by the governing board of the district; and,
 This form is an exact duplicate (verbatim) of the form provided by the Office of Public School Construction (OPSC).
 In the event a conflict should exist, then the language in the OPSC form will prevail.

SIGNATURE OF DISTRICT REPRESENTATIVE

DATE

EXHIBIT B

UPDATED SCHOOL FACILITIES CAPACITY CALCULATION

Orange Unified School District
School Facilities Capacity Calculation

Application	Item	Elementary School	Middle School	High School
N/A	SAB Form 50-02	16,575	4,536	7,452
N/A	Non-Severe/Severe Capacity	480	137	274
N/A	Additional Relocatable Capacity	476	189	525
50/66621-00-001	Running Springs Elementary	300	0	0
N/A	Riverdale Elementary School ^[1]	-600	0	0
N/A	Silverado Elementary School ^[2]	-150	0	0
Total Capacity	N/A	17,081	4,862	8,251

[1] Riverdale Elementary School was closed at the end of the 2009/2010 school year and was subsequently sold by the School District in June 2016. This school site no longer remains in the School District's inventory and its capacity has been removed from the calculation.

[2] Silverado Elementary School was closed at the end of the 2008/2009 school year and was subsequently sold by the School District in October 2013. This school site no longer remains in the School District's inventory and its capacity has been removed from the calculation.