
**SCHOOL FACILITY FEE JUSTIFICATION REPORT
FOR RESIDENTIAL, COMMERCIAL & INDUSTRIAL
DEVELOPMENT PROJECTS**

for the
PLEASANTON UNIFIED SCHOOL DISTRICT

June 2024

Prepared by
School Facility Consultants

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EXECUTIVE SUMMARY

The Pleasanton Unified School District (District) is justified to collect the legal maximum fee as authorized by Education Code Section 17620 and Government Code Section 65995 (Level I fees), which is currently \$5.17 per square foot of residential development (new residential construction and ADUs, other residential construction such as remodels and additions, mobile and manufactured homes and reconstruction) and \$0.84 per square foot of senior citizen housing, as future residential development creates a school facility cost of \$13.76 per square foot. The District is also justified to collect the legal maximum fee of \$0.84 per square foot of development on all categories of commercial/industrial development (except rental self-storage), as those categories of development create school facility costs ranging from \$4.50 to \$19.14 per square foot of future development, even when fees from linked residential units are accounted for. The school facility cost attributable to rental self-storage units is only \$0.22 per square foot when fees from linked residential units are accounted for. Rental self-storage creates a school facility cost of \$0.22 per square foot.

The District's justification for collecting fees on future residential and commercial/industrial development is based on the following facts and projections:

1. The District's current enrollment is larger than its pupil capacity. The District, therefore, does not have sufficient capacity to house students generated by future development. These students will require the District to acquire new school facilities.
2. Each square foot of future residential development creates an estimated school facilities cost of \$13.76. All categories of commercial/industrial development (except rental self-storage) create an estimated school facilities cost ranging from \$4.50 to \$19.14 per square foot of commercial/industrial development, even when fees from linked residential units are accounted for. Rental self-storage creates an estimated school facilities impact of \$0.22 per square foot of development.
3. If the District collects the current maximum fee on residential development authorized by Government Code Section 65995 of \$5.17 per square foot, fee revenue will offset 37.6 percent of the school facility cost attributable to residential development. If the District collects the current maximum fee on commercial/industrial development authorized by Government Code Section 65995 of \$0.84 per square foot, fee revenue will offset from 4.4 percent to 18.7 percent of the school facility cost attributable to commercial/industrial development (except rental self-storage). For both residential and commercial/industrial development, the fees authorized by Government Code Section 65995 are fully justified.

The fees outlined above all meet the requirements of Government Code Section 66001 (the nexus requirements), that is, a reasonable relationship exists between the amount and use of the fees and the developments on which they are charged.

End of Summary

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INTRODUCTION

This Report analyzes the cost of providing school facilities for students generated by future residential and commercial/industrial development projects in the Pleasanton Unified School District. *School Facility Consultants* has been retained by the District to conduct the analysis and prepare this Report.

A. Purpose and Scope

The purpose of this Report is to show that the District meets pertinent requirements of State law regarding the collection of developer fees.

State law gives school districts the authority to charge fees on new residential and commercial/industrial developments if those developments generate additional students and cause a need for additional school facilities and/or the refurbishment of school facilities to maintain existing levels of service. Government Code Section 65995 currently authorizes school districts to collect fees on future development of no more than \$5.17 per square foot for residential construction and \$0.84 for commercial/industrial construction (Level I fees). The maximum Level I fees are adjusted every two years according to the inflation rate for Class B construction as determined by the State Allocation Board, which last occurred in January 2024. Government Code Section 66001 requires that a reasonable relationship exist between the amount and use of the fees and the type of development on which the fees are to be charged.

This Report:

- identifies the cost of providing school facilities for students generated by future residential and commercial/industrial development in order to justify the collection of fees on those developments; and
- explains the relationship between the need for school facilities, the cost of school facilities, the amount of school impact fees, and the developments on which those fees are to be imposed.

B. Brief Description of the Pleasanton Unified School District

The Pleasanton Unified School District is located in Alameda County and the City of Pleasanton. The District's boundaries may be seen in greater detail on maps available at the District Office or by viewing online (<https://portal.schoolsitelocator.com/apps/ssl/?districtcode=17274>, Accessed June 2024).

The District currently serves 13,668 TK-12 students and operates nine elementary schools, three middle schools, two comprehensive high schools, one preschool and one adult and community education facility.

Identified plans for new residential development exist in the District. Based on the District's adopted *Student Population Forecast by Residence* (dated February 1, 2024) prepared by Davis Demographics and Planning, Inc. which includes estimates of planned residential development in the District based on information provided by the City of Pleasanton Planning Division and

information provided by the County of Alameda in December of 2023, the Report estimates 2,477 new residential units will be built in the District over the next five years.

To accommodate enrollment growth resulting in part from this new residential development, the District plans to build classroom additions at existing TK-5, 6-8 and 9-12 campuses. In addition, the District may need to refurbish facilities, (classroom, central administration and/or support facilities) to maintain existing levels of service as a result of increasing demand. Finally, the District may purchase or lease portable classrooms to use for interim housing while permanent facilities are being constructed.

C. Data Sources

The data sources for this Report are listed in the table below and referenced throughout the Report.

Data Sources

| Data Type | Data Source |
|--|---|
| Residential development rates | Pleasanton Unified School District (PUSD), City of Pleasanton, County of Alameda, local developers, <i>Student Population Projections by Residence</i> (2024) prepared by Davis Demographics and Planning, Inc. (https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=36030382&AID=709971&MID=27818) |
| Enrollment history | CBEDS (California Department of Education’s <i>DataQuest</i> web-portal) |
| Pupil capacity of District schools | Pleasanton Unified School District (PUSD), <i>2022 Facilities Master Plan</i> prepared by LPA Architects (https://lpamasterplans.com/pleasanton-usd-fmp/ , Accessed June 2024) |
| Student generation rates for housing units | <i>Student Population Projections by Residence</i> (2024) prepared by Davis Demographics and Planning, Inc. |
| Employees per square foot of commercial/industrial development | <i>San Diego Traffic Generators</i> (January 1990), San Diego Association of Governments |
| Number of workers per household | United State Census Bureau (2021) |

D. Outline of the Report

The Report is divided into six sections. The sections:

1. Identify the District’s school facility needs,
2. Calculate the financial impact on the District of future residential and commercial/industrial developments,
3. Compare the projected revenues from developer fees to the costs of providing facilities to students generated by future developments,
4. Show that the District satisfies the requirements of Government Code Section 66001 with respect to the collection of developer fees,
5. Summarize other potential funding sources for school facilities, and present recommendations regarding the imposition and collection of developer fees.

End of Section

I. DISTRICT FACILITY NEEDS

This Section describes the District’s requirements for school facilities. Specifically, the following subsections:

- A) Identify the District’s current enrollment and enrollment history,
- B) Identify the District’s current capacity,
- C) Subtract the District’s enrollment from the District’s capacity to calculate the District’s facility needs, and
- D) Describe the District’s plan to fulfill its facility needs.

A. Enrollment History

The Report uses the California Basic Educational Data Systems (CBEDS) to track the District’s total enrollment over the last five years (see Table 1-1). Total District enrollment has decreased by 1,188 students (8.0%) from 2019/20 to 2023/24.

**Table 1-1
District Enrollment History**

| Grade | 2019/20 | 2020/21 | 2021/22 | 2022/23 | 2023/24 |
|--------------|---------------|---------------|---------------|---------------|---------------|
| TK-5 | 6,182 | 5,943 | 5,675 | 5,572 | 5,467 |
| 6-8 | 3,541 | 3,412 | 3,386 | 3,351 | 3,261 |
| 9-12 | 5,133 | 5,087 | 5,003 | 4,931 | 4,940 |
| Total | 14,856 | 14,442 | 14,064 | 13,854 | 13,668 |

B. Pupil Capacity of District Facilities

The Report calculates the pupil capacity of the District by (1) taking an inventory of the classrooms that are included in the District’s long-term facility plans, and (2) applying the District’s desired classroom loading standards to that inventory.

1) Classroom Loading Standards

The District’s classroom loading standards are listed in Table 1-2. These standards reflect the District’s desired classroom loading to achieve optimal student achievement and are based on the State Facility Program loading standards, except at TK-3 where the District has elected to load at a lower standard as is its prerogative.

**Table 1-2
Loading Standards**

| Grade Group | Number of Students Per Classroom |
|---------------------------------------|---|
| TK-3 | 24 |
| 4-5 | 25 |
| 6-8 | 27 |
| 9-12 | 27 |
| Special Day Class Mild | 13 |
| Special Day Class Mod / Severe | 9 |

Source: Pleasanton Unified School District

2) Classroom Capacity

Table 1-3 lists the classroom capacity of the District by grade group. The capacity is determined by multiplying the number of classrooms in the District by the appropriate District loading standard identified in Table 1-2.

The classroom count reflects an inventory of the District’s school sites as outlined in the District’s current 2022 *II Facilities Master Plan* prepared by LPA Architects. Any facilities that are not part of the District’s long-range facility plan are not included in this count. Facilities not present in the classroom count include: (1) temporary portable classrooms owned or leased by the District, (2) classrooms that are inadequate in size, (3) pull-out type classrooms such as computer and science labs, (4) spaces being used as classrooms not originally designed as such and (5) classrooms not owned by the District.

**Table 1-3
Classroom Count and Pupil Capacity Based on
District Loading Standards**

| Grade Group | Number of Classrooms | Number of Pupils Per Classroom | Pupil Capacity |
|---------------------------------------|-----------------------------|---------------------------------------|-----------------------|
| TK-3 | 157 | 24 | 3,768 |
| 4-5 | 61 | 25 | 1,525 |
| 6-8 | 90 | 27 | 2,430 |
| 9-12 | 139 | 27 | 3,753 |
| Special Day Class Mild | 35 | 13 | 455 |
| Special Day Class Mod / Severe | 9 | 9 | 81 |
| Total | 491 | N/A | 12,012 |

3) Classroom Utilization

Table 1-4 shows the percentage of classroom capacity the District is utilizing by dividing the District’s current enrollment as indicated in the District’s 2023/24 enrollment information by the capacity listed above (Table 1-3).

**Table 1-4
2023/24 Classroom Utilization**

| Grade Group | Pupil Capacity | 2023/24 Enrollment | Percent Utilization |
|--------------|----------------|--------------------|---------------------|
| TK-5 | 5,433 | 5,467 | 100.6% |
| 6-8 | 2,526 | 3,261 | 129.1% |
| 9-12 | 4,053 | 4,940 | 121.9% |
| Total | 12,012 | 13,668 | 113.8% |

As Table 1-4 shows, the District is currently operating at over 100 percent of capacity at all grade groupings.

C. District Facility Requirements

Table 1-5 calculates the District’s requirements for school facilities by subtracting its current capacity from its current student enrollment.

**Table 1-5
District Facility Needs/Unhoused Students**

| Grade Group | 2023/24 Enrollment | District Capacity (Pupils) | Unhoused Students |
|--------------|--------------------|----------------------------|-------------------|
| TK-5 | 5,467 | 5,433 | 34 |
| 6-8 | 3,261 | 2,526 | 735 |
| 9-12 | 4,940 | 4,053 | 887 |
| Total | 13,668 | 12,012 | 1,656 |

As Table 1-5 shows, the District will need school additional facilities to accommodate student growth generated by new development in the following grade levels: 34 TK-5 students, 735 6-8 students, and 887 9-12 students.

D. Plan for Fulfilling School Facility Needs

In order to provide facilities for the unhoused students listed in Table 1-5, the District plans to construct new classroom additions at existing TK-5, 6-8 and 9-12 campuses. In addition, the District may need to refurbish facilities, (classroom, central administration and/or support facilities) to maintain existing levels of service as a result of increasing demand. Finally, the District may purchase or lease portable classrooms to use for interim housing while permanent facilities are being constructed.

**Table 1-6
District Facility Plan**

| Projects | Pupil Capacity | Time Frame |
|---|-----------------------|----------------------------|
| TK-5 Elementary School Additions | 34 | 5 years |
| 6-8 Middle School Additions | 735 | 5 years |
| 9-12 High School Additions | 887 | 5 years |
| Interim Housing | N/A | throughout next 5 years |
| Total | 1,656 | N/A |

End of Section

II. FINANCIAL IMPACT ON THE DISTRICT OF FUTURE RESIDENTIAL DEVELOPMENT

This Section quantifies how future residential development financially affects the District.

Future residential development will generate additional students in the District. As shown in the previous section, adequate school facilities do not exist for these students. Future residential development, therefore, financially affects the District by generating a need for additional school facilities and/or refurbished school facilities that the District must acquire at some cost. This section describes this cost in three ways: (1) dollars per TK-12 student generated from future development, (2) dollars per housing unit and (3) dollars per square foot of future development.

In order to calculate the financial effects described above, the Report needs to first calculate the number of students that will live in new housing units in the District and the per-pupil cost of providing school facilities for TK-5, 6-8 and 9-12 students.

A. Number of Students per New Housing Unit

This Report uses the student generation rate from the District’s Board adopted *Student Population Projections by Residence* prepared by Davis Demographics and Planning, Inc.

Table 1-7 lists the student generation rates used in this Report.

**Table 1-7
Student Generation Rates**

| Grade Group | Students per Residential Housing Unit* |
|--------------------|---|
| TK-5 | 0.203 |
| 6-8 | 0.086 |
| 9-12 | 0.085 |
| Total | 0.374 |

*Weighted based on the number of Single Family Detached (SFD) Units, Multi-Family Attached (MFA) units, Transit Oriented Development (TOD) units and apartment (APT) units estimated to be built in the District over the next five years (568 SFD, 234 MFA, 1,325 TOD and 350 APT).

B. Cost of Providing School Facilities

The per-pupil cost of providing school facilities for unhoused students is outlined in Table 1-8. This Report uses the District’s 2022 *Facilities Master Plan* prepared by LPA Architects to determine the costs of the cost model projects for additions at the District’s existing elementary, middle and high school campuses.

Although this report has quantified the cost of providing school facilities by detailing the cost to build additional capacity on existing school campuses, the District has identified substantial modernization and refurbishing need. Even if this report quantified the costs associated with the reconstruction need, the calculated cost per pupil for reconstruction would be in addition to those costs identified in Table 1-8.

The District may also experience interim housing costs while permanent facilities are being constructed. Interim housing costs, however, are not quantified in this Report.

**Table 1-8
Per-Pupil Facility Costs for TK-12 Students**

| Grade Group | Project | Project Costs | Project Capacity | Per-Pupil Facility Cost |
|-------------|--|---------------|------------------|-------------------------|
| TK-5 | TK-5 Elementary School Addition Cost Model | \$113,636,153 | 1,946 | \$58,395 |
| 6-8 | 6-8 Middle School Addition Cost Model | \$6,666,209 | 135 | \$49,379 |
| 9-12 | 9-12 High School Addition Cost Model | \$21,757,659 | 377 | \$61,988 |
| TK-12 | Modernization | N/A | N/A | N/A |
| TK-12 | Interim Housing | N/A | N/A | N/A |

C. Cost of Providing School Facilities per New TK-12 Student Generated by Future Residential Development

This Report determines the facility cost of a TK-12 student generated by future residential development by calculating a weighted average of the facility costs for TK-5, 6-8 and 9-12 students.

The relative size of the TK-5, 6-8 and 9-12 student generation rates tell us that 54.28 percent of students from new units will be TK-5 students and 22.99 percent will be 6-8 students and 22.73 percent will be 9-12 students. Table 1-9 weights each per-pupil facility cost by the appropriate percentage and provides a weighted average facility cost for TK-12 students from future residential development.

**Table 1-9
Weighted Average School Facility Cost for a K-12 Student
From Future Residential Development**

| Grade Group | Cost Per-Pupil | Weighting Based on Student Generation Rate | Weighted Cost Per-Pupil |
|-------------|----------------|--|-------------------------|
| TK-5 | \$58,395 | 54.28% | \$31,697 |
| 6-8 | \$49,379 | 22.99% | \$11,352 |
| 9-12 | \$61,988 | 22.73% | \$14,090 |
| TK-12 | N/A | 100% | \$57,139 |

D. Cost of Providing School Facilities per New Residential Housing Unit

Table 1-10 multiplies the total number of students per housing unit by the facility costs of a TK-12 student to calculate a facility cost attributable to future residential housing units.

**Table 1-10
TK-12 School Facility Cost per New Housing Unit**

| Student Generation Rate | TK-12 Per-pupil Facility Cost | Cost Per New Housing Unit |
|--------------------------------|--------------------------------------|----------------------------------|
| 0.374 | \$57,139 | \$21,370 |

E. Cost of Providing School Facilities per Square Foot of Future Residential Development

This Report calculates the school facility cost per square foot of future development by dividing the cost per housing unit by the average square footage of housing units.

Based on a review of Alameda County Assessor data, this Report estimates that SFD units in the District will have an average square footage of approximately 3,106 square feet.

Based on a review of Alameda County Assessor data, this Report estimates that MFA units in the District will have an average square footage of approximately 1,812 square feet.

Based on a review of Alameda County Assessor data, within one mile of the BART and ACE stations, this Report estimates that TOD units in the District will have an average square footage of approximately 863 square feet.

Based on a review of Alameda County Assessor data, *not* within one mile of the BART station, this Report estimates that APT units in the District will have an average square footage of approximately 1,474 square feet.

The weighted average of these estimates is 1,553 square feet based on the number of SFD units, MFA units, TOD units and Apartments projected to be built in the District over the next five years.

Table 1-11 shows the TK-12 school facility costs per square foot of new residential housing units, but not the amount which would actually be charged (which is limited to \$5.17 per square foot of residential development).

**Table 1-11
TK-12 School Facility Cost per Square Foot of Residential Development**

| Facility Cost Per New Housing Unit | Average Square Footage | Facility Cost Per Square Foot of Development |
|---|-------------------------------|---|
| \$21,370 | 1,553 | \$13.76 |

End of Section

III. REVENUE FROM FEES ON RESIDENTIAL DEVELOPMENT VERSUS COSTS OF SCHOOL FACILITIES

This Section compares the projected revenues from fees levied on future residential development to the school facility costs attributable to that development.

State law currently caps Level I Fees at \$5.17 per square foot of assessable space of residential construction. As demonstrated in the previous section, each square foot of future residential development will generate a school facility cost of \$13.76. Any given amount of future development will, therefore, generate more school facility costs than Level I Fee revenue (i.e., for every \$1.00 in fee revenue generated by future development, \$2.66 in school facility costs are generated).

Based on an evaluation of the *Student Population Projections by Residence (2024)* prepared by Davis Demographics and Planning, Inc. (derived from data provided by the City of Pleasanton) and information provided by Alameda County in December of 2023, this Report estimates that 568 SFD units, 234 MFA units, 1,325 TOD units and 350 APT units (total of 2,477 units) are anticipated to be built in the District within the next five years. For any given amount of residential development, however, school facility costs will be greater than fee revenue by a ratio of \$2.66 to \$1.00.

A. Fee Revenue from Residential Development Over the Next Five Years

As stated in the previous section, the Report estimates that new residential units will average 1,553 square feet over the next five years.

As Table 1-12 shows, if the District collects the current Level I Fee of \$5.17 per square foot, the District will collect \$19,887,858 in residential developer fees over a five year projection period.

**Table 1-12
Revenue from Residential Developer Fees**

| New Housing Units | Average Square Footage | Fee Amount | Revenues From Fees on New Housing Units |
|-------------------|------------------------|------------|---|
| 2,477 | 1,553 | \$5.17 | \$19,887,858 |

B. Fee Revenue from Additions to Existing Residences

Revenue will be collected from fees assessed on additions and remodels of existing residences, to the extent that these additions exceed the exclusionary threshold outlined in the Education Code. Pursuant to Education Code Section 17620(a)(1)(C)(i), developer fees may be charged on residential additions “only if the resulting increase in assessable space exceeds 500 square feet.” The fee revenue calculation for additions is the same as

for new units. For example, additions totaling 40,000 square feet would generate \$206,800 in fee revenue (40,000 multiplied by \$5.17).

C. Fee Revenue from Reconstruction and Redevelopment

Revenue will be collected from fees assessed on projects that reconstruct or redevelop existing housing, but only to the extent that the square footage of the new construction exceeds the square footage of the reconstructed or redeveloped housing. The fee revenue calculation for reconstruction and/or redevelopment is the same as for new units. For example, reconstruction and/or redevelopment totaling 50,000 square feet would generate \$258,500 in fee revenue (50,000 times \$5.17).

D. School Facility Costs Generated by Residential Development Over the Next Five Years

The total school facility cost attributable to future residential development over the next five years is calculated by multiplying the following two factors: (1) the number of new housing units and (2) the facility cost per new housing unit. Table 1-13 shows that the total school facility cost attributable to future development is \$52,933,490.

**Table 1-13
School Facility Cost Generated by Students from Future Development**

| New Units | Cost Per New Housing Unit | Total Cost |
|-----------|---------------------------|--------------|
| 2,477 | \$21,370 | \$52,933,490 |

E. School Facility Costs Generated by Additions to Existing Residences

Additions to existing residences will have the same financial effect on the District as new residential units. For example, residential additions of 40,000 square feet will generate an additional 10 students, when applying the student generation rate calculated in this Report, and a school facilities cost to the District of \$571,390 (10 students times a per-pupil facilities cost of \$57,139).

F. School Facility Costs Generated by Reconstruction and Redevelopment

Reconstruction and redevelopment of existing homes will have the same financial effect on the District as new residential development. For example, reconstruction and/or redevelopment of 50,000 square feet will generate an additional 12 students when applying the student generation rate calculated in this Report and a school facilities cost to the District of \$685,668 (12 students times a per-pupil facilities cost of \$57,139).

G. Extent of Mitigation of School Facility Costs Provided by Level I Residential Fees

Table 1-14 shows that \$19,887,858 in total residential Level I fee revenue will cover only 37.6 percent of the \$52,933,490 in total school facility costs attributable to residential development over the next five years. Some of this shortfall may be recovered from fees on commercial development.

Table 1-14
Facility Cost of Residential Development versus Fee Revenue

| Total School Facility Costs | Total Revenues From Fees | Net Facility Cost to the District |
|------------------------------------|---------------------------------|--|
| \$52,933,490 | \$19,887,858 | \$33,045,632 |

H. Senior Citizen Restricted Housing

As required by law, a lower fee, currently the commercial/industrial maximum of \$0.84 per square foot, is established for certain types of residences that are restricted in occupancy as a senior citizen housing development, as defined in California Civil Code Section 51.3, or a residential care facility for the elderly as defined in California Health and Safety Code Section 1569.2. Housing of this type generates employees and has an indirect impact on the school district similar to that from commercial/industrial development projects.

The District must exercise discretion in determining whether a particular project qualifies as “senior citizen housing” for the purpose of imposing developer fees. (See California Ranch Homes Development Co. v. San Jacinto Unified School Dist. (1993) 17 Cal.App.4th 573, 580–581.) The District also acknowledges that students typically do not reside in senior citizen housing units unless the CC&Rs permit such living arrangements. However, the development of such housing generally generates jobs for facilities maintenance and administration, and in the case of assisted care living situations, health professionals. These jobs may be filled by persons living either within the boundaries of the District or outside the boundaries of the District. In either case, the employees may enroll their students in the District. As a result, some students may be generated as a result of the development of new senior citizen housing.

The District acknowledges Section 65995.1 and will levy its share of developer fees on any senior citizen housing projects at the current commercial/industrial rate. The District will require proof that such senior units are indeed restricted to seniors (i.e. a copy of the recorded CC&Rs or deed(s)) and reserves the right to revoke a Certificate of Compliance and/or require payment of difference of the amount per square foot paid to the then current amount of developer fees being levied on residential development per square foot should such CC&Rs or deed(s) be modified to allow students to reside such the housing units. If there is any uncertainty as to whether a project qualifies as senior citizen housing or will, in fact, remain senior citizen housing beyond initial approval, the District may wish to seek cooperation from the developer as a condition of levying the commercial/industrial rate. Such cooperation could take the form of an agreement by the developer to record a condition upon the property that then current residential fees would be due to be paid should the residency requirements change so as to allow students to reside on the property.

End of Section

IV. FINANCIAL EFFECT ON THE DISTRICT OF NEW COMMERCIAL/INDUSTRIAL DEVELOPMENT

This Section analyzes the costs of providing school facilities for students generated by new commercial/industrial development.

Commercial/industrial development will attract additional workers to the District, and, because some of those workers will have school-age children, will generate additional students in the District. Additionally, the District will likely experience additional students from new workers who do not live in the District, but whose school-age children attend the District as transfer students. As shown in Section I, adequate school facilities do not exist for these students. New commercial/industrial development, therefore, creates a fiscal impact on the District by generating a need for new school facilities.

The Report multiplies the following five factors together to calculate the school facility cost incurred by the District per square foot of new commercial/industrial development:

- A. Employees per square foot of new commercial/industrial development,
- B. Percent of employees in the District that also live in the District,
- C. Houses per employee,
- D. Students per house, and
- E. School facility cost per student.

The Report calculates each of these factors in the next sections.

A. Employees per Square Foot of Development

As permitted by State law, the Report uses results from a survey published by the San Diego Association of Governments (SanDAG) (see Appendix) to establish the number of employees per square foot of new commercial/industrial development projects.

**Table 1-15
Employees per Square Foot of Commercial/Industrial
Development, by Category**

| Commercial/Industrial Category | Average Square Foot per Employee | Employees per Average Square Foot |
|-----------------------------------|----------------------------------|-----------------------------------|
| Banks | 354 | 0.00283 |
| Community Shopping Centers | 652 | 0.00153 |
| Neighborhood Shopping Centers | 369 | 0.00271 |
| Industrial Business Parks | 284 | 0.00352 |
| Industrial Parks | 742 | 0.00135 |
| Rental Self Storage | 17,096 | 0.00006 |
| Scientific Research & Development | 329 | 0.00304 |
| Lodging | 882 | 0.00113 |
| Standard Commercial Office | 208 | 0.00480 |
| Large High Rise Com. Office | 232 | 0.00432 |
| Corporate Offices | 372 | 0.00269 |
| Medical Offices | 234 | 0.00427 |

Source: 1990 SanDAG Traffic Generators Report.

B. Percentage of Employees Residing Within the District

United States Census Bureau data from the American Community Survey for 2019 (Table B080008 – *Sex of Workers By Place of Work – Place Level*), indicates that approximately 41 percent of people working in the District also live in the District.

C. Number of Households per Employee

United States Census Bureau data from the American Community Survey for 2019 (Table B25001 – *Housing Units* and Table B080008 – *Sex of Workers By Place of Work – Place Level*), indicates that there are approximately 1.37 workers per household. Likewise, this data indicates that there are 0.73 housing units for every one worker. The Report, therefore, assumes that each new resident worker in the District will demand 0.73 housing units.

D. Number of Students per Dwelling Unit

As outlined in Section II.A., the Report assumes that 0.374 TK-12 pupils will reside in each housing unit in the District.

E. School Facility Cost Per-Pupil

As outlined in Section II.C., the Report estimates that the school facility cost per TK-12 pupil is \$57,139. It should be noted that these facility costs are conservative and the District’s actual facility costs will likely be higher.

F. School Facility Cost per Square Foot of Commercial/Industrial Development

Table 1-16 calculates the school facility cost generated by a square foot of chargeable covered and enclosed space of new commercial/industrial development for each of the categories of commercial/industrial projects listed in Table 1-15.

School facility costs for development projects not included on this list may be estimated by using the closest employee per square foot ratio available for the proposed development or by following the District's administrative procedures for appeals of school facility fee imposition.

(continued on the next page)

**Table 1-16
Facility Cost per Square Foot of Commercial/Industrial
Development, by Category**

| Category | Employee per Square Foot | % Employees Residing in District | Dwelling Units per Employee | TK-12 Students per Dwelling Unit | Cost per TK-12 Student | Cost per Square Foot |
|-------------------------------|--------------------------|----------------------------------|-----------------------------|----------------------------------|------------------------|----------------------|
| Banks | 0.00283 | 0.41 | 0.73 | 0.374 | \$57,139 | \$18.10 |
| Community Shopping Centers | 0.00153 | 0.41 | 0.73 | 0.374 | \$57,139 | \$9.79 |
| Neighborhood Shopping Centers | 0.00271 | 0.41 | 0.73 | 0.374 | \$57,139 | \$17.33 |
| Industrial Business Parks | 0.00352 | 0.41 | 0.73 | 0.374 | \$57,139 | \$22.51 |
| Industrial Parks | 0.00135 | 0.41 | 0.73 | 0.374 | \$57,139 | \$8.63 |
| Rental Self-storage | 0.00006 | 0.41 | 0.73 | 0.374 | \$57,139 | \$0.38 |
| Scientific R&D | 0.00304 | 0.41 | 0.73 | 0.374 | \$57,139 | \$19.44 |
| Lodging | 0.00113 | 0.41 | 0.73 | 0.374 | \$57,139 | \$7.23 |
| Standard Com. Offices | 0.00480 | 0.41 | 0.73 | 0.374 | \$57,139 | \$30.70 |
| Large High Rise Com. Offices | 0.00432 | 0.41 | 0.73 | 0.374 | \$57,139 | \$27.63 |
| Corporate Offices | 0.00269 | 0.41 | 0.73 | 0.374 | \$57,139 | \$17.21 |
| Medical Offices | 0.00427 | 0.41 | 0.73 | 0.374 | \$57,139 | \$27.31 |

The District is justified in collecting the Government Code maximum of \$0.84 per square foot for all categories (except rental self-storage) of commercial/industrial development because these categories, on a per square foot basis, generate a school facility cost greater than the Government Code maximum of \$0.84.

The justified fee amount for self-storage is \$0.38, before accounting for any offset for linked residential construction.

G. Calculating School Facility Cost of Commercial/Industrial Development with Residential Fee Offset

A “residential fee offset” is calculated by (1) determining the number of homes that are associated with the employees generated by new commercial/industrial development and (2) calculating the residential fee revenues the District will collect from those homes (*note: the residential fee offset calculation assumes that all the homes associated with new employees are new homes; in reality, some new employees will live in existing homes*). This report assumes the District will collect \$5.17 per square foot of new residential development.

Subtracting the residential fee offset from the total school facility cost generated by commercial/industrial development produces a discounted school facility cost that takes into account revenues from “linked” residential units.

Table 1-17 calculates the facility cost of new commercial/industrial development, while taking into account the revenues from linked residential units.

**Table 1-17
School Facility Cost of New Commercial/Industrial Development Discounted by
Residential Fee Offset**

| Category | Dwelling Unit Per Square Foot Com/Ind | Average Square Foot per Unit* | District's Revenue per Square Foot Res. Dev. | Residential Offset per Com/Ind Square Foot | School Facility Cost per Square Foot Comm/Ind Development | Cost per Square Foot Less Offset |
|------------------------------------|---------------------------------------|-------------------------------|--|--|---|----------------------------------|
| Banks | 0.00085 | 1,553 | \$5.17 | \$6.82 | \$18.10 | \$11.28 |
| Community Shopping Centers | 0.00046 | 1,553 | \$5.17 | \$3.69 | \$9.79 | \$6.10 |
| Neighborhood Shopping Centers | 0.00081 | 1,553 | \$5.17 | \$6.50 | \$17.33 | \$10.83 |
| Industrial Business Parks | 0.00105 | 1,553 | \$5.17 | \$8.43 | \$22.51 | \$14.08 |
| Industrial Parks | 0.00040 | 1,553 | \$5.17 | \$3.21 | \$8.63 | \$5.42 |
| Rental Self-storage | 0.00002 | 1,553 | \$5.17 | \$0.16 | \$0.38 | \$0.22 |
| Scientific R&D | 0.00091 | 1,553 | \$5.17 | \$7.31 | \$19.44 | \$12.13 |
| Lodging | 0.00034 | 1,553 | \$5.17 | \$2.73 | \$7.23 | \$4.50 |
| Standard Commercial Offices | 0.00144 | 1,553 | \$5.17 | \$11.56 | \$30.70 | \$19.14 |
| Large High Rise Commercial Offices | 0.00129 | 1,553 | \$5.17 | \$10.36 | \$27.63 | \$17.27 |
| Corporate Offices | 0.00081 | 1,553 | \$5.17 | \$6.50 | \$17.21 | \$10.71 |
| Medical Offices | 0.00128 | 1,553 | \$5.17 | \$10.28 | \$27.31 | \$17.03 |

As the table shows, the school facility cost of all categories of commercial/industrial development (except rental self-storage) are greater than the current Government Code maximum of \$0.84 per square foot, even when that cost is discounted by revenues from linked residential units. Therefore, the District is justified in collecting the Government Code maximum of \$0.84 per square foot for all categories of commercial/industrial development (except rental self-storage). This discounting most likely understates the true facility cost of commercial/industrial development, because not all new workers will live in new homes.

For illustrative purposes, the Report will compare the school facility cost generated by 140,000 square feet of a new community shopping center development to the fee revenue it will provide to the District. This analysis is valid, however, for all types of commercial/industrial development except rental self-storage.

If the District were to charge \$0.84 per square foot of commercial/industrial development, it would collect \$117,600 from the 140,000 square feet of the community shopping center development. Assuming that all employees of the community shopping center development live in new homes, the District will also collect \$514,740 in revenue from developer fees (140,000 square feet x 0.00153 employees per square foot x 41% employees that live in District x 0.73 housing units per employee x 1,553 square feet per housing unit x \$5.17 revenue from Level I Residential developer fees). The 140,000 square feet of the community shopping center development will create a school facilities cost of \$1,370,600 (140,000 square feet x \$9.79 school facility cost per square foot of community shopping center).

Table 1-18 compares the school facility costs generated by 140,000 square feet of the community shopping center development in the District’s TK-12 service area to the fee revenues it provides to the District.

**Table 1-18
Comparison of Facility Cost and Fee Revenue Generated by
New Community Shopping Center Development**

| | Fee Revenues | Facility Costs | Total Revenues (Costs) |
|---|---------------------|-----------------------|-------------------------------|
| 140,000 square feet of community shopping center development | \$117,600 | \$1,370,600 | (\$1,253,000) |
| New housing units associated with the development | \$514,740 | N/A | \$514,740 |
| Total | \$632,340 | \$1,370,600 | (\$738,260) |

As the table shows, fee revenue from community shopping center development will cover only 46.1 percent of the school facility cost it generates, even when that cost is discounted by the revenues from linked new housing units.

All categories of commercial/industrial development (except self-storage) will generate more facility cost than fee revenue, because they all generate a facility cost greater than \$0.84 per square foot even when fees from linked residential units are considered. The fee amount for self-storage is only \$0.22, after accounting for fees generated by linked residential units.

End of Section

V. FINDINGS

This Section shows that the District meets the requirements of Government Code Section 66001 regarding the collection of developer fees and summarizes other potential funding sources for the District's capital projects.

A. Government Code Section 66001(a)(1)—Purpose of the Fee

The purpose of collecting fees on residential and commercial/industrial development is to acquire funds to construct or reconstruct school facilities for the students generated by new residential and commercial/industrial developments.

B. Government Code Section 66001(a)(2)—Use of the Fee

The District use of the fee is expected to involve constructing and/or reconstructing new elementary, middle and high school campuses and/or additional permanent facilities on existing elementary, middle and high school campuses. The District is looking for alternatives to provide adequate housing and program options to all students including construction of additions to existing elementary, middle and high schools. The District may also refurbish school facilities to maintain existing levels of service to accommodate increased demand on such facilities as a result of student enrollment growth generated by new development. In addition, the District may build other school related facilities such as central administrative and support facilities, or purchase or lease portable classrooms to use for interim housing while permanent facilities are being constructed.

Revenue from fees collected on residential and commercial/industrial development may be used to pay for any of the following:

- (1) Land (purchased or leased) for school facilities,
- (2) Design of school facilities,
- (3) Permit and plan checking fees,
- (4) Construction or reconstruction of school facilities including refurbishment to maintain existing levels of service,
- (5) Testing and inspection of school sites and school buildings,
- (6) Fixtures for use in new school facilities,
- (7) Interim school facilities (purchased or leased) to house students generated by new development while permanent facilities are being constructed,
- (8) Legal and administrative costs associated with providing facilities to students generated by new development,
- (9) Administration of the collection of developer fees (including the costs of justifying the fees and making the findings and determinations required), and
- (10) Miscellaneous purposes resulting from student enrollment growth caused by new residential development.

C. Government Code Section 66001(a)(3)—Relationship Between Fee’s Use and the Type of Project Upon Which the Fee is Imposed

Future residential development will cause new families to move into the District and, consequently, will generate additional students in the District. As shown in Section I.B. of this Report, adequate school facilities do not exist for these students. Future residential development, therefore, creates a need for additional school facilities. The fee’s use (acquiring school facilities) is, therefore, reasonably related to the type of project (future residential development) upon which it is imposed.

Recent legislation expounded the parameters of attached and detached living areas, which are attached or detached from the primary single-family or multi-family dwelling unit (generally referred to as Accessory Dwelling Units (ADUs), and Junior Accessory Dwelling Units (JADUs).) Whether these types of dwelling units are called casitas, granny flats, in-law units, accessory units, or converted living space, these constructed areas are intended to provide an area for living and sleeping – whether the facilities and provisions for living, sleeping, eating, cooking, and sanitation are within that living space or within (or adjacent to) the attached single-family or multi-family dwelling unit. The District recognizes that students are generated from these types of living areas and will levy the appropriate residential fee rate for these types of construction projects.

New commercial/industrial development will cause new workers to move into the District. Commercial/industrial will also generate new students in the District, since some of these workers will have school-age children. As shown in Section I.B. of this Report, adequate school facilities do not exist for these students. New commercial/industrial development, therefore, creates a need for additional school facilities. The fee’s use (acquiring school facilities) is, therefore, reasonably related to the type of project (new commercial/industrial development) upon which it is imposed.

D. Government Code Section 66001(a)(4)—Relationship Between the Need for the Public Facility and the Type of Project Upon Which the Fee is Imposed

The District’s current enrollment is larger than its pupil capacity. The District, therefore, does not have sufficient existing capacity to house students generated by future development. Future residential and commercial/industrial development in the District will generate additional students and, consequently, a need for additional school facilities. A relationship exists, therefore, between the District’s need to build additional school facilities and the construction of new residential and commercial/industrial development projects.

E. Government Code Section 66001(b)—Relationship Between the Fee and the Cost of the Public Facility Attributable to the Development on Which the Fee is Imposed

This Report demonstrates that the school facility cost attributable to future residential development is \$13.76 per square foot. The maximum Level I fee of \$5.17 per square foot on residential development is, therefore, fully justified.

This Report also demonstrates that the school facility costs attributable to all categories of commercial/industrial development (except rental self-storage) range from \$4.50 per square foot to \$19.14 per square foot, even when fees from linked residential units are accounted for. The maximum Level I fee of \$0.84 on these types of development is, therefore, fully justified. The school facility cost attributable to rental self-storage units is only \$0.22 per square foot when fees from linked residential units are accounted for.

All school facility costs and fees in this Report are calculated on a per-student basis to ensure that future developments only pay for impacts they cause.

**Table 1-19
Projected Five-Year District Revenue**

| | Revenues |
|---|----------------------|
| 1. Capital Assets: | |
| Current Capital Facility Fund Balance | \$2,975,286 |
| Measure II Available for Capacity Additions | \$43,000,000 |
| Measure I Available for Capacity Additions | \$100,000,000 |
| Total Capital Assets | \$145,975,286 |
| 2. Projected Revenue from Developer Fees: | |
| Residential Development* | \$19,887,858 |
| Commercial/Industrial Development** | \$761,399 |
| Total Projected Revenue from New Development | \$20,649,257 |
| Total Projected Five-Year District Revenue | \$166,624,543 |

* Estimate based on 2,477 homes averaging 1,553 square feet times the District's anticipated revenue of \$5.17 per square foot.

** Estimate based on the previous 5-years of commercial/industrial development totaling 906,427 square feet times the District's anticipated revenue of \$0.84 per square foot.

Information in Table 1-19 outlines the District's projected revenue for capital outlay for the next five years and includes the current balance of the District's Capital Facility Funds, the current and anticipated amounts from the passage of the District's Measure II General Obligation Bond Measure in November of 2016 and Measure I General Obligation Bond Measure in November 2022 and the projected revenue from new residential and commercial/industrial development. After accounting for these current and estimated amounts, the District has projected capital facility revenue of \$166,624,543 over the next five years.

The District's 2022 Facilities Master Plan identifies projects necessary to provide adequate student facilities, with construction costs totaling an estimated \$929,629,000. Comparing the District's projected revenue over the next five years, to the estimated cost of implementing the District's facility needs, indicates that projected facility costs will exceed revenues by \$763,004,457.

F. Other Funding Sources

The following is a review of other potential funding sources for constructing school facilities.

(1) General Fund

The District's General Fund budget is typically committed to instructional and day-to-day operating expenses and not used to construct school buildings, as funds are needed solely to meet the District's non-facility needs.

(2) State Programs

The District has applied for and received State funding apportionments for construction of new school facilities under the 1998 Leroy F. Greene School Facility Program. Even projects funded at 100 percent of the State allowance, however, often experience a shortfall between State funding and the District's actual facility needs. State funds for deferred maintenance may not be used to pay for new facilities. State law prohibits use of lottery funds for facilities.

(3) General Obligation Bonds

School districts can, with the approval of two-thirds or 55 percent of its voters, issue general obligation bonds that are paid for out of property taxes. In November 2016, the District's voters passed General Obligation Bond II authorizing a total of \$270 million in bond sales.

(4) Parcel Taxes

Approval by two-thirds of the voters is required to impose taxes that are not based on the assessed value of individual parcels. While these taxes have been occasionally used in school districts, the revenues are typically minor and are used to supplement operating budgets.

(5) Mello-Roos Community Facilities Districts

This alternative uses a tax on property owners within a defined area to pay long-term bonds issued for specific public improvements. Mello-Roos taxes require approval from two-thirds of the voters (or land owners if fewer than 12) in an election.

(6) Surplus Property

The District has no surplus properties that could be sold to create a significant source of capital outlay funds.

(7) Alternatives for Reducing Facility Costs

Alternatives to reducing facility costs which have been used and/or explored by the District include additional portable classrooms, joint-use of facilities, Multi-Track Year-Round Education, and other measures. These options remain available to the District in the future.

End of Section

VI. RECOMMENDATIONS

This Report recommends that the District levy the maximum statutory fee authorized by Government Code Section 65995, up to \$13.76 per square foot of residential development. The Report also recommends that the District levy the maximum fee as authorized by Government Code Section 65995, (currently \$0.84 per square foot) on all categories of commercial/industrial development except rental self-storage, as those categories of development create school facility costs ranging from \$4.50 to \$19.14 per square foot of future development, even when fees from linked residential units are accounted for. The fee amount for Rental Self-Storage is \$0.22, after accounting for fees generated by linked residential units.

These recommendations are based on the findings that residential and commercial/industrial development (except for rental self-storage) creates a school facility cost for the District that is larger than the revenue generated by charging these fees.

End of Report

Appendix

Employee Statistics From the San Diego Association Of Governments By Various Categories of Commercial/Industrial Development (from Traffic Generators Report January 1990)

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Appendix A

Employee Statistics From the San Diego Association of Governments by Various Categories of Commercial/Industrial Development (from Traffic Generators Report January 1990)

| | Employees | Total Sq. ft | Sq Ft / Employee | Employee Per Sq. ft |
|---------------------------------------|-----------|--------------|------------------|---------------------|
| Banks | | | | |
| Calif. First | 57 | 13,400 | 354 | 0.00283 |
| Southwest | 11 | 3,128 | | |
| Mitsubishi | 14 | 6,032 | | |
| Security Pacific | 22 | 14,250 | | |
| Total | 104 | 36,810 | | |
| Average | 26 | 9,203 | | |
| Community Shopping Centers | | | | |
| Rancho Bernardo Towne Center | 273 | 139,545 | 652 | 0.00153 |
| Plaza De Las Cuatro Banderas | 227 | 186,222 | | |
| Rancho San Diego Village | N/A | N/A | | |
| Total | 500 | 325,767 | | |
| Average | 250 | 162,884 | | |
| Neighborhood Shopping Centers | | | | |
| Town and Country | 217 | 70,390 | 369 | 0.00271 |
| Tierrasanta II | 87 | 49,080 | | |
| Palm Plaza | 143 | 47,850 | | |
| Westwood Center | 173 | 61,285 | | |
| Total | 620 | 228,605 | | |
| Average | 155 | 57,151 | | |
| Industrial Business Parks | | | | |
| Convoy Ct / St. Parks | 955 | 224,363 | 284 | 0.00352 |
| Sorrento Valley Blvd. / Ct. Complexes | 2,220 | 610,994 | | |
| Ronson Court | 848 | 206,688 | | |
| Pioneer Industrial Project | N/A | N/A | | |
| Sorrento Valley | N/A | N/A | | |
| Torrey Business & Research | 739 | 243,829 | | |
| Ridgehaven Court | 823 | 213,449 | | |
| Ponderosa Avenue Industrial | 245 | 158,983 | | |
| Total | 5,830 | 1,658,306 | | |
| Average | 972 | 276,384 | | |

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| | Employees | Total Sq. ft | Sq Ft / Employee | Employee Per Sq. ft |
|--|-----------|--------------|------------------|---------------------|
| Industrial Parks | | | | |
| Sorrento West | 725 | 614,922 | 742 | 0.00135 |
| Roselle Street | 761 | 500,346 | | |
| Stromesa Street | 200 | 136,124 | | |
| Total | 1,686 | 1,251,392 | | |
| Average | 562 | 417,131 | | |
| Rental Self-Storage | | | | |
| Poway Storage | 2 | 32,000 | 17,096 | 0.00006 |
| Lively Center | 2 | 20,000 | | |
| Brandon Street Mini-Storage | 2 | 31,348 | | |
| Melrose Mini-Storage | 2 | 28,280 | | |
| Lock-It Lockers Storage | 3 | 59,325 | | |
| Total | 11 | 170,953 | | |
| Average | 2 | 34,191 | | |
| Scientific Research and Development | | | | |
| Johnson & Johnson Biotechnology Center | 39 | 22,031 | 329 | 0.00304 |
| IVAC Corporation | 1,300 | 315,906 | | |
| TRW/LSI Products | 350 | 145,192 | | |
| Nissan Design International | 26 | 40,184 | | |
| Salk Institute | 500 | 318,473 | | |
| S-Cubed Corporation | 160 | 56,866 | | |
| Torrey Pines Science Park | 2,333 | 649,614 | | |
| Total | 4,708 | 1,548,266 | | |
| Average | 673 | 221,181 | | |
| Lodging | | | | |
| San Diego Hilton | 139 | 223,689 | 882 | 0.00113 |
| Hyatt Islandia | 320 | 250,000 | | |
| La Jolla Village Inn | 180 | 129,300 | | |
| Hanalei Hotel | 310 | 267,000 | | |
| Vagabond Inn | 12 | 22,548 | | |
| Fabulous Inn & E-Z8 Motel | 92 | 92,731 | | |
| Vacation Village | 234 | 151,134 | | |
| Total | 1,287 | 1,136,402 | | |
| Average | 184 | 162,343 | | |

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| | Employees | Total Sq. ft | Sq Ft / Employee | Employee Per Sq. ft |
|--|------------------|---------------------|-------------------------|----------------------------|
| Standard Commercial Office | | | | |
| Industrial Indemnity Bldg. | 170 | 34,300 | 208 | 0.00480 |
| Beta Bldg. | 110 | 29,400 | | |
| Park Camino Bldg. | 299 | 55,500 | | |
| 2181 E.C.R. Bldg. | 47 | 10,000 | | |
| Camino Real Financial Center | 23 | 6,300 | | |
| Total | 649 | 135,500 | | |
| Average | 130 | 27,100 | | |
| Large High Rise Com. Office | | | | |
| Mission Valley Financial Center (Security Pacific) | 900 | 185,600 | 232 | 0.00432 |
| Lion Plaza Building | 462 | 109,900 | | |
| Crossroads Limited Building (Crocker and Xerox) | 512 | 138,900 | | |
| Total | 1,874 | 434,400 | | |
| Average | 625 | 144,800 | | |
| Corporate Offices | | | | |
| Equitable Life | 200 | 53,900 | 372 | 0.00269 |
| Bank of America Processing Center | 300 | 110,000 | | |
| Home Federal Processing Center | 1,150 | 450,000 | | |
| Trade Services Publications | 270 | 82,000 | | |
| IRT Corporation | 210 | 89,500 | | |
| Earl Walls & Assoc. | 43 | 15,000 | | |
| Four Winds International Headquarters | 220 | 90,914 | | |
| Total | 2,393 | 891,314 | | |
| Average | 342 | 127,331 | | |
| Medical Offices | | | | |
| Chula Vista Doctors' Park | 108 | 24,000 | 234 | 0.00427 |
| Parkway Medical Group | 65 | 17,620 | | |
| Campus Medical-Dental Center | 115 | 25,900 | | |
| Total | 288 | 67,520 | | |
| Average | 96 | 22,507 | | |

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