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

for the

SAN BERNARDINO CITY UNIFIED SCHOOL DISTRICT

October 2024

Prepared by
School Facility Consultants

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EXECUTIVE SUMMARY

The San Bernardino City Unified School District (District) is justified to collect the legal maximum fee of \$5.17 per square foot of residential development as authorized by Government Code Section 65995 (Level I fees), as future residential development creates a school facility cost of \$33.73 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 \$13.12 to \$55.88 per square foot of future development, even when fees from linked residential units are accounted for. Rental self-storage creates a school facility cost of \$0.72.

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 for the TK-6, 7-8 and 9-12 grade groups. The District, therefore, does not have sufficient capacity to house TK-12 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 \$33.73. All categories of commercial/industrial development (except rental self-storage) create an estimated school facilities cost ranging from \$13.12 to \$55.88 per square foot of commercial/industrial development, even when fees from linked residential units are accounted for.
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 15.3 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 1.5 percent to 6.4 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 Section

INTRODUCTION

This Report analyzes the cost of providing school facilities for students generated by future residential and commercial/industrial development projects in the San Bernardino City Unified School District (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. Government Code Section 65995 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). Level I fees are adjusted every two years according to the inflation rate for Class B construction as determined by the State Allocation Board. Government Code Section 66001 requires that a reasonable relationship exist between the amount and use of the fees and the 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 fees and the developments on which those fees are to be charged.

B. Brief Description of the San Bernardino City Unified School District

The San Bernardino City Unified School District is located in San Bernardino County. District boundaries may be seen in greater detail on maps available at the District Office.

The District currently serves over 50,000 students in grades TK-12 and operates 50 elementary schools, 11 middle schools, six comprehensive high schools, one community day school, one alternative education school and numerous specialized schools.

Opportunities for new residential development exist in the District as 2,185 new residential units are anticipated to be subject to Level I fees, and are currently projected to be built in the District over the next five years.

To accommodate this future residential development, the District plans to construct additions on existing campuses at all grade groups. In addition, 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	City of San Bernardino; City of Highland; County of San Bernardino; San Bernardino City Unified School District (SBCUSD); Local development project information
Commercial/industrial development rates	SBCUSD Developer Fee Collection Data
Enrollment history	CBEDS, SBCUSD
Pupil capacity of District schools	SBCUSD
Student generation rates for housing units	United States Census Bureau, American Community Survey; CBEDS
Employees per square foot of commercial/industrial development	San Diego Association of Governments
Number of workers per household	United States Census Bureau, American Community Survey

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 for 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
6. Present recommendations regarding the 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 capacity,
- B) Identify the District’s enrollment history and classroom utilization
- C) Subtract the District’s current 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. 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 state classroom loading standard to that inventory.

1) Classroom Loading Standards

The State’s classroom loading standards are listed in Table 1-1.

**Table 1-1
State Loading Standards**

Grade Level	Number of Students Per Classroom
TK-6	25
7-8	27
9-12	27
NS SDC	13
S SDC	9

2) Classroom Capacity

Table 1-2 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 loading standard identified in Table 1-1.

The classroom count was established by conducting an inventory of the District’s school site. 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) portable classrooms (temporary structures, intended to provide interim housing while permanent facilities are planned, designed and constructed), (2) small classrooms (rooms that are not suitable for implementing a standard curriculum), (3) pull-out type classrooms such as computer labs, (4) spaces currently being used as classrooms not originally designed as such, and (5) classrooms not owned by the District.

**Table 1-2
Classroom Count and Pupil Capacity Based on
State Loading Standards**

Grade Group	Number of Classrooms	Number of Pupils Per Classroom	Pupil Capacity
TK-6	875	25	21,875
7-8	250	27	6,750
9-12	366	27	9,882
NS SDC	63	13	819
S SDC	79	9	711
Total	1,633	N/A	40,037

B. Five-Year Enrollment History

1) 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 1-3). Total District enrollment has decreased by 1,394 students (2.7%) from 2019/20 to 2023/24.

**Table 1-3
District Enrollment History**

Grade	2019/20	2020/21	2021/22	2022/23	2023/24
TK-6	30,286	28,752	28,698	27,842	27,584
7-8	8,398	7,970	7,774	7,544	7,646
9-12	13,144	13,429	13,555	13,982	15,204
Total	51,828	50,151	50,027	49,368	50,434

2) Percent Utilization

Table 1-4 shows the percentage of classroom capacity the District is utilizing by dividing the District’s current enrollment by the capacity listed above (Table 1-2).

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

Grade Group	Pupil Capacity	2023/24 Enrollment	Percent Utilization
TK-6	22,588	27,584	122.1%
7-8	6,983	7,646	109.5%
9-12	10,466	15,204	145.3%
Total	40,037	50,434	126.0%

C. District Facility Requirements

Table 1-5 calculates the District’s requirements for school facilities over the next five years by subtracting its current capacity from its current 2023/24 enrollment.

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

Grade Group	2023/24 Enrollment	Pupil Capacity	Unhoused Students
TK-6	27,584	22,588	4,996
7-8	7,646	6,983	663
9-12	15,204	10,466	4,738
Total	50,434	40,037	10,397

As Table 1-5 shows, the District currently needs additional facilities for 4,996 TK-6 students, 663 7-8 students and 4,738 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 Elementary School, Middle School and High School facilities on existing sites. In addition, the District may lease additional portable classrooms to use for interim housing while permanent school facilities are being constructed.

**Table 1-6
District Facility Plan**

Projects	Pupil Capacity	Time Frame
New K-6 School Additions	4,996	5 years
New 7-8 School Additions	663	5 years
New 9-12 School Additions	4,738	5 years
Interim Housing	N/A	throughout next 5 years
Total	10,397	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 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 elementary, middle and high school students.

A. Number of Students per New Housing Unit

This Report estimates the number of students that each future residential housing unit will generate by analyzing the rate at which previously built housing units have generated current District pupils.

The Report calculates this student generation rate by dividing the number of TK-12 students attending public schools in the District in 2021/22 by the total number of housing units in the District in 2021 according to United States Census Bureau data.

Table 1-7 lists the student generation rates for the District.

**Table 1-7
Student Generation Rates**

Grade Group	Students per Residential Housing Unit
TK-6	0.362
7-8	0.098
9-12	0.171
Total	0.631

B. Cost of Providing School Facilities

The per-pupil cost of providing school facilities for unhoused students is outlined in Table 1-8. The cost of the District's housing plan is based on the District cost model projects for additions at the TK-6, 7-8 and 9-12 grade groups. The District may 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	Facility Cost	Pupil Capacity	Per-Pupil Facility Cost
TK-6	Paakuma K-8 Addition	\$3,180,660	25	\$127,226
TK-6	Total TK-6 Addition Cost	N/A	N/A	\$127,226
7-8	Paakuma K-8 Addition	\$6,370,871	54	\$117,979
7-8	Total 7-8 Addition Cost	N/A	N/A	\$117,979
9-12	Cajon High School Classroom Addition	\$5,101,232	296	\$17,234
9-12	Cajon High School Library/Admin Addition	\$26,563,769	2,067	\$12,851
9-12	Total 9-12 Addition Cost	N/A	N/A	\$30,085
TK-12	Interim Housing Costs	N/A	N/A	N/A

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

The Report determines the facility cost of a TK-12 student generated by future development by calculating a weighted average of the facility costs for elementary, middle and high school students.

The relative size of the three SGRs for residential housing units tells us that 57.4 percent of students from new units will be elementary students, 15.5 percent will be middle school students and 27.1 percent will be high school 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 TK-12 Student
From Future Residential Development**

Grade Group	Cost Per Pupil	Weighting Based on Student Generation Rate	Weighted Cost Per Pupil
TK-6	\$127,226	57.4%	\$73,028
7-8	\$117,979	15.5%	\$18,287
9-12	\$30,085	27.1%	\$8,153
TK-12	N/A	100%	\$99,468

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 TK-12 students to calculate an average \$62,764 facility cost attributable to future residential housing units.

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

Student Generation Rate	TK-12 Per-pupil Facility Cost	Cost Per New Housing Unit
0.631	\$99,468	\$62,764

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.

This report estimates that the new housing units in the District are anticipated to have average square footages of 2,475 for single-family detached and 1,016 for single-family attached and multi-family units. The weighted average of these estimates is 1,861 square feet based on number of single- and multi-family units projected to be built in the District over the next five years that will be subject to a Level I fee.

Table 1-11 shows the school facility cost per square foot of new residential housing units.

**Table 1-11
School Facility Cost Per Square Foot of Residential Development**

Facility Cost Per Unit	Average Square Footage	Facility Cost Per Square Foot of Development
\$62,764	1,861	\$33.73

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. As demonstrated in the previous section, each square foot of future residential development will generate a school facility cost of \$33.73. Any given amount of future development will, therefore, generate more school facility costs than Level I Fee revenue (i.e., at \$5.17, every \$1.00 in fee revenue generated by future development will generate \$6.52 in school facility costs).

A. Fee Revenue from Future Residential Development

Based on information provided by the District, this Report estimates that 2,185 housing units will 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 \$6.52 to \$1.00 at \$5.17 per square foot.

As stated in the previous section, the Report estimates that new residential units will average 1,861 square feet over the next five years.

If the District were to collect the maximum allowable Level I fee (\$5.17) on residential development, the District would collect \$21,022,693 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
2,185	1,861	\$5.17	\$21,022,693

B. Fee Revenue from Additions to Existing Residences

Revenue will be collected from fees assessed on additions to 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 \$137,139,340.

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

New Units	Cost Per New Housing Unit	Total Cost
2,185	\$62,764	\$137,139,340

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 fourteen students, when applying the student generation rate calculated in this Report, and a school facilities cost to the District of \$1,392,552 (fourteen students times a per-pupil facilities cost of \$99,468).

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 seventeen students when applying the student generation rate calculated in this Report and a school facilities cost to the District of \$1,690,956 (seventeen students times a per-pupil facilities cost of \$99,468).

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

Table 1-14 shows that \$21,022,693 in total residential Level I fee revenue will cover only 15.3 percent of the \$137,139,340 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
\$137,139,340	\$21,022,693	\$116,116,647

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 to senior citizens. Housing of this type generates employees and has an indirect impact on the school district similar to that from commercial/industrial development projects.

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. 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

U.S. Census data indicates that approximately 30 percent of people working in the District also live in the District.

C. Number of Households per Employee

U.S. Census data 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 0.631 TK-12 pupils will reside in each housing unit.

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 \$99,468.

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 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.

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

Category	Employees 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	0.30	0.73	0.631	\$99,468	\$38.90
Community Shopping Centers	0.00153	0.30	0.73	0.631	\$99,468	\$21.03
Neighborhood Shopping Centers	0.00271	0.30	0.73	0.631	\$99,468	\$37.25
Industrial/business Parks	0.00352	0.30	0.73	0.631	\$99,468	\$48.38
Industrial Parks	0.00135	0.30	0.73	0.631	\$99,468	\$18.56
Rental Self-Storage	0.00006	0.30	0.73	0.631	\$99,468	\$0.82
Scientific R&D	0.00304	0.30	0.73	0.631	\$99,468	\$41.79
Lodging	0.00113	0.30	0.73	0.631	\$99,468	\$15.53
Standard Commercial Offices	0.00480	0.30	0.73	0.631	\$99,468	\$65.98
Large High Rise Com. Offices	0.00432	0.30	0.73	0.631	\$99,468	\$59.38
Corporate Offices	0.00269	0.30	0.73	0.631	\$99,468	\$36.98
Medical Offices	0.00427	0.30	0.73	0.631	\$99,468	\$58.69

The District generates a school facility cost greater than the Government Code maximum of \$0.84 per square foot for all categories of commercial/industrial development (except rental self-storage).

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	0.00062	1,861	\$5.17	\$5.97	\$38.90	\$32.93
Community Shopping Centers	0.00034	1,861	\$5.17	\$3.27	\$21.03	\$17.76
Neighborhood Shopping Centers	0.00059	1,861	\$5.17	\$5.68	\$37.25	\$31.57
Industrial Business Parks	0.00077	1,861	\$5.17	\$7.41	\$48.38	\$40.97
Industrial Parks	0.00030	1,861	\$5.17	\$2.89	\$18.56	\$15.67
Rental Self-storage	0.00001	1,861	\$5.17	\$0.10	\$0.82	\$0.72
Scientific R&D	0.00067	1,861	\$5.17	\$6.45	\$41.79	\$35.34
Lodging	0.00025	1,861	\$5.17	\$2.41	\$15.53	\$13.12
Standard Commercial.Offices	0.00105	1,861	\$5.17	\$10.10	\$65.98	\$55.88
Large High Rise Com. Offices	0.00095	1,861	\$5.17	\$9.14	\$59.38	\$50.24
Corporate Offices	0.00059	1,861	\$5.17	\$5.68	\$36.98	\$31.30
Medical Offices	0.00094	1,861	\$5.17	\$9.04	\$58.69	\$49.65

As the table shows, the school facility cost of all categories (except rental self-storage) is greater than the 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 collection the Government Code maximum of \$0.84 per square foot for all categories of commercial/industrial development (except rental self-storage).

For illustrative purposes, the Report will compare the school facility cost generated by 140,000 square feet of 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 charges \$0.84 per square foot of commercial/industrial development, it will collect \$117,600 from the 140,000 square feet of community shopping center development. Assuming that all of the employees of the community shopping center development live in new homes, the District will also collect \$451,337 in revenue from residential developer fees (140,000 square feet x 0.00153 employees per square foot x 30% employees that live in District x 0.73 housing units per employee x 1,861 square feet per housing unit x \$5.17 revenue from developer fees). The 140,000 square feet of community shopping center development will create a school facilities cost of \$2,944,200 (140,000 square feet x \$21.03 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 community shopping center development 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	\$2,944,200	(\$2,826,600)
New housing units associated with the development	\$451,337	N/A	\$451,337
Total	\$568,937	\$2,944,200	(\$2,375,263)

As the table shows, fee revenue from community shopping center development will cover only 19.32 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 school facility costs attributable to rental self-storage are calculated to be \$0.72 per square foot, even after accounting for 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's use of the fee will involve constructing new school facilities. In addition, the fee may be used to construct additional permanent facilities on existing school campuses, and/or constructing and/or reconstructing school campuses. The District will also need to 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,
- (5) Testing and inspection of school sites and school buildings,
- (6) Furniture 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
- (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.

New commercial/industrial development will cause new workers to move into the District. Because some of these workers will have school-age children, commercial/industrial development will also generate new students in the District. 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 for grades TK-6, 7-8 and 9-12 is larger than its pupil capacity. The District, therefore, does not have sufficient existing capacity in grades TK-6, 7-8 and 9-12 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 \$33.73 per square foot. Level I fees of \$5.17 per square foot on residential development are, 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 \$13.12 per square foot to \$55.88 per square foot, even when fees from linked residential units are accounted for. Level I fees of \$0.84 on these types of development are, therefore, fully justified. The school facility cost attributable to rental self-storage units is \$0.72 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.

The total cost for providing school facilities for existing unhoused students, as documented in Table 1-5 and Table 1-8 is \$856,383,903. The District's local funds available for new school facilities, is \$118,092,472. Comparing the cost of providing school facilities for existing unhoused students (\$856,383,903) to the amount of funds available (\$118,092,472) demonstrates that the District does not have sufficient funds available for acquiring new school facilities.

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 for capital outlay uses, as funds are needed solely to meet the District's non-facility needs.

2) State Programs

The District has been approved for eligibility and has received State funding for the design of new school facilities under the 1998 Leroy F. Greene School Facility Program. Even projects funded at 100 percent of the State allowance, however, 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.

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 does not own any surplus property that could be used to finance additional school facilities.

End of Section

VI. RECOMMENDATIONS

As described in Section II.E, the District's cost per square foot of residential development is \$33.73. Therefore, this Report recommends that the District levy a fee, as authorized by Government Code Section 65995, not to exceed \$33.73 per square foot of residential development.

As described in Section IV.G, the District's cost per square foot of commercial/industrial development ranges from \$13.12 to \$55.88 (except for rental self-storage). 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. The calculated impact of Rental Self Storage is \$0.72 per square foot, as outlined in Section IV.G of the report.

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)

Appendix

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		

	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		

	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	109,000		
Crossroads Limited Building (Crocker and Xerox)	512	138,900		
Total	1,874	433,500		
Average	625	144,500		
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		