

Oxnard Union High School District

DEVELOPER FEE JUSTIFICATION STUDY

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TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	DISTRICT PROFILE.....	1
	A. DISTRICT OVERVIEW	1
	B. DEMOGRAPHIC OVERVIEW	1
III.	SUMMARY OF FINDINGS	2
	A. JUSTIFICATION OF DEVELOPER FEES	2
IV.	DEVELOPER FEE OVERVIEW.....	4
	A. THREE LEVELS OF DEVELOPER FEES.....	4
V.	SCHOOL FACILITIES NEEDS ANALYSIS AND ADOPTION.....	5
	A. CONTENT AND PROCESS	5
	B. SCHOOL CAPACITIES	5
	C. DEMOGRAPHICS	6
	D. ALLOWABLE COST AND FEES	8
	E. CALCULATION OF LEVEL 1 RESIDENTIAL FEES	11
VI.	COMMERCIAL AND INDUSTRIAL FEE JUSTIFICATION	12
	A. EMPLOYEE GENERATION RATES FOR RESIDENTIAL DEVELOPMENT.....	12
	B. DISTRICT RESIDENT EMPLOYEES	ERROR! BOOKMARK NOT DEFINED.
	C. EMPLOYEE IMPACT PER UNIT OF RESIDENTIAL CONSTRUCTION	13
	D. COMMERCIAL/INDUSTRIAL SQUARE FOOTAGE PER EMPLOYEE	13
	E. COMMERCIAL/INDUSTRIAL SQUARE FEET PER RESIDENTIAL UNIT	13
	F. COMMERCIAL/INDUSTRIAL FEE GENERATED PER HOUSING UNIT.....	14
	G. MAXIMUM JUSTIFIED FEE	14
VII.	CONCLUSIONS AND RECOMMENDATIONS – LEVEL 1 STATUTORY FEE	16
	A. RESIDENTIAL DEVELOPER FEES.....	16
	B. COMMERCIAL/INDUSTRIAL DEVELOPER FEES	16

EXHIBIT A – DISTRICT MAP

I. INTRODUCTION

The following information represents the statutory requirements pursuant to Senate Bill 50 (“SB 50”) or other collateral legislation for the Oxnard Union High School District (“District”) Developer Fee Justification Study (DFJS).

The DFJS was prepared by Consultant and staff pursuant to the requirements of SB 50,¹ and Government Code Section 65995 *et seq.*, both of which became effective on November 4, 1998. The DFJS meets Government Code Section 66001, which requires that a reasonable relationship exist between the amount of residential, commercial and industrial fees, use of the fees and the development for which the fees are to be charged.

II. DISTRICT PROFILE

A. District Overview

The District is comprised of four jurisdictions: City of Oxnard, City of Camarillo, City of Port Hueneme and Ventura County. A District map inclusive of the District’s location and boundaries is set forth in Exhibit A. The District serves students in grades 9 through 12 and operates seven (7) comprehensive high schools, one (1) continuation high school, one (1) dual college enrollment high school, one (1) independent academy high school, and two (2) charter high schools.

B. Demographic Overview

The District 2023/24 CBED enrollments were 16,759 students in grades 9-12. In comparison to the 2013/14 CBEDs enrollment of 16,302 (9-12) students, the current enrollment has grown by 457 students over the last 10 years. This equates to an annual average growth rate of 0.28%. New residential and commercial development have been primary causes of student population increases. Therefore, the data set forth in this document justifies the need for existing and future school facilities.

¹ Chapter 407; Statutes 1998

III. SUMMARY OF FINDINGS

A. Justification of Developer Fees

The following is a justification of Developer fees based on Government Code Section 65995.

1. District school capacity is based on existing utilization of classrooms and related SB 50 regulations that exclude all portable classrooms above 25% of the number of permanent classrooms. The District has a current capacity for 16,339 students (does not include facilities for Adult Transitional SDC).
2. The District 2023/24 CBED enrollments are 16,759 students in grades 9-12 (does not include Adult Transitional SDC students). Therefore, District 9-12 enrollments exceed 2024 school capacity by 420 students and new classroom facilities will be required for enrollments generated by new residential and commercial development.
3. Planned new residential construction data and proposed future market absorption rates for new homes indicate that approximately 941 single family detached units, 1,037 single family attached units and 615 multi-family attached units are forecast to be constructed within the District over the next 5 years.
4. The projected average student yield rate for grades 9-12 applicable to each new single family detached unit is 0.10, single family attached unit is 0.07, and multi-family unit is 0.06.
5. A total of 204 9-12 students are projected from the 2,593 new residential homes planned to be constructed over the next five years.
6. The allowable costs for new school construction pursuant to SB 50 are \$43,184 per high school pupil (State Grant 50% x 2). Allowable costs include additional allowable costs for automatic fire detection/alarm system and automatic sprinkler system.
7. In addition to school construction costs, site acquisition and additional site development costs can be included in allowable costs. The allowable site acquisition and additional site development costs are estimated to be \$4,372,498.
8. Based on a five-year historical analysis of new residential construction District-wide, the average new single-family detached unit size is 1,683 square feet, the average single-family attached unit size is 1,909, and the average new multi-family attached unit size is 977 square feet. Applying the average unit size to the number of planned

residential units to be constructed, total projected new residential area is 4,164,191 square feet.

9. There are limited local funding sources available to finance capital improvements to 9-12 school facilities that are needed to adequately house students projected to be generated by new residential construction. Potential local sources of funding may include: local G.O. Bonds, developer fees, revenue from surplus property disposition and other sources as applicable. However, available funds are required to house existing students within the District.

Therefore, based on the above findings and related information set forth in this report, Level 1 Statutory fees for residential and commercial development are justified and should continue to be levied as follows:

Elementary Feeder School Area	OUHSD % of Fee Split w/ Elementary SD	OUHSD Level 1 Residential Fee	OUHSD Commercial / Industrial Fee
Hueneme ESD	40%	\$2.07 per sf	\$0.34 per sf
Mesa Union ESD	34%	\$1.76 per sf	\$0.29 per sf
Ocean View ESD	30%	\$1.55 per sf	\$0.25 per sf
Oxnard ESD	34%	\$1.76 per sf	\$0.29 per sf
Pleasant Valley ESD	40%	\$2.07 per sf	\$0.34 per sf
Rio ESD	29%	\$1.50 per sf	\$0.24 per sf
Somis ESD	40%	\$2.07 per sf	\$0.34 per sf

IV. DEVELOPER FEE OVERVIEW

SB 50² authorizes qualifying school districts to levy three different levels of developer fees for residential construction, as set forth in Government Code Sections 65995, 65995.5 and 65995.7. Only Level 1, Statutory fees, apply to commercial and industrial development.

A. Three Levels of Developer Fees

SB 50 established the legal process whereby builders of new homes may be required to pay for new, expanded or reconstructed school facilities to serve the new homes. The three-tier fee structure and corresponding fee levels are:

1. **Level 1 Fees (Statutory fees):** Statutory fee amounts are authorized to be adjusted for inflation every two years per the published statewide cost index for Class B construction, as determined by the State Allocation Board (SAB) at its January meeting. The current K-12 base statutory fee for new residential construction is \$5.17 per square foot (District receives 9-12 portion, 29 to 40%; \$1.50 to \$2.07), and \$0.84 per square foot for new commercial and industrial construction (District receives 9-12 portion, 29 to 40%; \$0.24 to \$0.34).
2. **Level 2 Fees:** The District may, under specific circumstances, impose fees beyond the Level One statutory fee. Government Code Section 65995.5 provides for an alternative school mitigation fee (“Alternative Fee”) that allows Districts to levy fees equivalent to approximately 50% of the cost of school construction including service site and some off-site costs.
3. **Level 3 Fees:** If the State Allocation Board declares that the State School Facilities Program has run out of bond funds, Level 3 fees may be implemented allowing the District to collect fees equivalent to approximately 100% of the cost of the required new, modernized or reconstructed school facilities, minus any local dedicated school funds.

² Chapter 407, Statutes 1998

V. SCHOOL FACILITIES NEEDS ANALYSIS AND ADOPTION

A. Content and Process

The DFJS, as set forth herein, determines the need for new or reconstructed school facilities for pupils attributable to projected enrollment growth from new residential units over the next five-year period.

If applicable, the District will identify and consider: (1) surplus property, and (2) local sources other than developer fees, charges and dedications to finance the construction of school facilities attributable to new residential construction.

The DFJS shall be made available for public review and comment two (2) weeks prior to the District Board of Trustees conducting a public hearing, with notice of the hearing sent to each city and county within the District's jurisdiction, and adopted by District Resolution at the duly noticed public hearing.

B. School Capacities

1. Existing School Capacity

Pursuant to SB 50, existing school capacity is determined by a teaching station methodology whereby each permanent teaching station is counted and loaded at the rate of 25 students per classroom for grades kindergarten through sixth and 27 students per classroom for grades 7-8 and 9-12. Pursuant to Education Code Section 17071.30(b), the maximum number of portable classrooms included within the capacity calculation shall not exceed 25% of the number of permanent classrooms.

Set forth in the following **Table 1** is the District 2024 capacity, which is based on current usage of classrooms and architect analysis of useable classrooms on school sites.

Table 1
Existing School Site Capacity

Grade Level	Permanent ¹ Classrooms	Portable ¹ Classrooms	Total Classrooms (Permanent & Portable)	Classroom Loading	SB 50 Capacity
9-12	465	107	572	27	15,444
9-12 NS SDC	36	10	46	13	598
9-12 S SDC	19	14	33	9	297
Total	520	117	637		16,339

¹Classroom inventory does not include rooms used for alternative purposes, i.e., administration and Adult Transition SDC etc.

2. Available School Capacity

Potential available school capacity for students generated by new residential development is determined by overlaying the District 2023/24 CBED enrollments (9-12) with the District 2024 capacity.

As set forth in the following **Table 2**, the District 2023/24 9-12 enrollments exceed capacity by 420 students. Therefore, the District has no available capacity for students from new residential development.

Table 2
District 2024 Available Classroom Capacity

Grade Level	2023/24 CBEDS (9-12)	2024 Capacity	Projected Available Capacity
9-12	16,759	16,339	(420)

C. Demographics

1. Projected Development

Future levels of residential development will primarily be determined by the supply and demand for new homes in the area. As economic trends change so will the need for new housing.

The following **Table 3** sets forth the current five year projected new residential development.

Table 3
5-Year Projected New Residential Development

5-Year Projected New Residential Development Projects	Single-Family Detached Units	Single-Family Attached Units	Multi-Family Units
City of Oxnard			
Rio Urbana		167	
Wagon Wheel Development		248	154
East Village III (Maulhardt)	500		250
20 Townhomes		20	
North Shore Subdivision	292		
Encanto	5		
C Street Apartments			175
Las Cortes Phase 3		129	
Portofino Place		90	
City of Camarillo			
Lennar Homes	144		
Camarillo Village (Palmera)		279	24
Village Gateway		96	
Lustra Development		8	12
Total Projected Units	941	1,037	615

Note: Some development may be under a mitigation agreement and is included for capacity and cost projections purposes only.

2. Student Yield Rates

Student yield rates are the average number of students that are generated by each new housing unit. Student yield rates were determined by utilizing historical development information provided by District and analysis of most recent development projects. **Table 4** sets forth the District yield rates. However, minimal development has been constructed and sold/occupied since yield rates were determined in 2022 and therefore, 2022 DFJS yield rates were utilized for this report.

Table 4
Student Yield Rates

Housing Type	9-12
Single Family Unit (SFD)	0.10
Single Family Unit (SFA)	0.07
Multi-Family Unit (MFA)	0.06

3. Enrollments from New Residential Development

As set forth in the following **Table 5**, new residential development projected over the next five years will yield approximately 204 9-12 students. The District is currently over capacity by 420 students District-wide. Therefore, the projected 9-12 students will be considered “un-housed.”

Table 5
Enrollments Generated by Projected Residential Units

2024 to 2028 5-Year Projected Buildout	Projected Units	Student Yield Rates	Projected Students
		9-12	9-12
Single Family (SFD)	941	0.10	94
Single Family (SFA)	1,037	0.07	73
Multi-Family (Apts)	615	0.06	37
Total	2,593		204

4. New Residential Square Footage

An analysis conducted of historical building permits issued and constructed within the District found that the average size of a new single family detached home is 1,683 square feet, the average size of a single family attached home is 1,909, and the average size of a new multi-family attached home is 977 square feet. Using average residential square footages, the following **Table 6** sets forth the projected square footage of new residential units to be constructed over the next five years.

Table 6
Projected New Residential Square Footage

Type of Dwelling Unit	Avg. Sq. Footage per Dwelling Unit	Projected New Residential Units	Projected Square Footage
Single Family (SFD)	1,683	941	1,583,703
Single Family (SFA)	1,909	1,037	1,979,633
Multi-Family Attached (MFA)	977	615	600,855
Total			4,164,191

D. Allowable Cost and Fees

Education Code Section 17072.10 establishes allowable cost factors for school construction that are used to determine the appropriate developer fee for new residential development. The cost factors set forth below were developed on a per-student basis and are based on District’s estimated new school construction costs to adequately house students in the District.

1. Site Acquisition Costs

The California Department of Education (CDE) sets forth the required school site sizes for K-12 in the “Guide to School Site Analysis and Development, 2000 Edition.” As identified in the following **Table 7**, the District average comprehensive high school enrollment is 2,345 students (does not include Del Sol or Rancho Campagna due to current size of schools), which was used to determine recommended CDE site size. However, the actual cost calculation utilized is based on students projected from new development and reflects site acquisition costs for specific amount of land needed to house projected un-housed students from new residential development regardless of current site size.

The average cost of undeveloped land within the District is estimated to be approximately \$550,000 per acre based on 2019 appraisal for Maulhardt Ranch (includes 10% escalation). Note: Land costs vary depending on area of District and type of land available. In addition, the District is allowed to include costs up to 4% of actual purchase price of land for escrow, Phase I, and Preliminary Endangerment Assessment (PEA).

Using the CDE Guide for school sites and projected un-housed students from new residential development, the projected site acquisition needs and costs were determined in Table 7.

Table 7
Estimated Site Acquisition Costs

	High School 9-12
Average High School Enrollments	2,345
CDE Recommended Site Size (acres)	52.7
Estimated Cost per Acre for Land ¹	\$ 550,000.00
Total Estimated Cost for Land	\$ 28,985,000.00
4% Add'l Costs for Site Acquisition	1,159,400.00
Total Estimated Site Acquisition Costs	\$ 30,144,400.00
Total Projected Land Needs based on Projected Un-housed Students	
Projected Un-housed Students	204
Estimated Land Needed (acres)	4.58
Estimated Site Acquisition Costs (based on per student cost)	\$2,622,370

¹Estimate only; land prices will be dependent on market demands at time of purchase.

2. Construction Costs

Construction costs are derived from the OPSC new construction per-pupil grant for K-12 students. The grants are \$21,592 for high school pupils (includes additional allowable grants for automatic fire detection/alarm system and automatic sprinkler system). The

OPSC construction grants are 50% of total cost to construct school facilities per pupil. Therefore, the total estimated construction cost per high school pupil is \$43,184 as set forth in **Table 8**.

Table 8
Estimated Construction Costs for New School Facilities (based on OPSC Grants 2024)

Type of State Funding	High School (9-12)
Per pupil Grant	\$21,223
Fire Detection/Alarm Grant	\$42
Sprinklers Grant	\$327
Est. State Grant/Cost per Pupil (50%)	\$21,592
Est. District Cost per Pupil (50%)	\$21,592
Total Estimated Construction Cost per Pupil (100%)	\$43,184
Projected Un-housed Pupils from New Homes	204
Total Est. Construction Costs for Projected Un-housed Pupils (100%)	\$8,809,536

3. Additional Site Development Costs

The State construction cost calculation also includes costs for Service site development, Off-site development and Utilities (additional site development costs). Using OPSC approved additional site development costs for Rancho Campana High (constructed in 2015), the estimated additional site development cost per acre is \$382,124 as shown in **Table 9**.

Table 9
Estimated Additional Site Development Costs

9-12 School Site	OPSC Approved Add'l Site Development Costs (100%)	2024 Add'l Site Development Costs (adjusted to 2024 Construction Cost Index) 100%	Site Acres	Estimated Add'l Site Development Costs per Acre
Rancho Campana High	\$6,814,600	\$10,263,860	26.86	\$382,124

Note: Site development costs vary depending on location, availability of utilities etc.

Using CDE guidelines for site acreage requirements for high school sites, it was determined that the projected 204 un-housed 9-12 students from new residential development will require approximately 4.58 acres. Therefore, the total estimated

additional site development cost for projected un-housed 9-12 students is \$1,750,128 as shown in **Table 10**.

Table 10
Additional Site Development Costs per Student

Grade Level	Required Acres	Estimated Additional Site Development Costs per Acre	Estimated Additional Site Development Costs
9-12	4.58	\$382,124	\$1,750,128

4. Total Estimated Costs to House Students from New Residential Development

As set forth in the following **Table 11**, the total allowable costs for new construction are \$13,182,034 for projected 9-12 students from new residential development over the next five years.

Table 11
Total Estimated Costs to House Students from New Residential Development

Type of Cost	9-12
Site Acquisition and Related Fees	\$2,622,370
Cost to Construct New School Buildings	\$8,809,536
Additional Site Development Costs	\$1,750,128
Total New Construction Costs for Projected Students	\$13,182,034

E. Calculation of Level 1 Residential Fees

Based upon the total estimated school facilities costs for new construction, the District is projected to have a capital facilities funding shortfall of \$13,182,034. When the shortfall amount is divided by the total estimated square footage projected from new residential development, the District's projected capital facilities funding shortfall is \$3.17 per square foot of new residential development as set forth in **Table 12**.

Therefore, the District is justified in levying a District 9-12 portion of Level 1 Statutory Fees in the amount of \$1.50 to \$2.04 per square foot of new residential construction based on area and feeder school district agreement.

Table 12
Capital Facilities Shortfall

	Developer Fee Calculation
Capital Facilities Funding Required for New School Facilities	\$13,182,034
Estimated Square Footage of New Residential Development	4,164,191
Capital Facilities Shortfall per Sq. ft. of Residential Development	\$3.17

VI. COMMERCIAL AND INDUSTRIAL FEE JUSTIFICATION

The current maximum fee for commercial/industrial development authorized by Government Code Section 65995 is \$0.84 per square foot (K-12), the District 9-12 portion ranges from \$0.24 to \$0.34 (29% to 40%). The rationale for assessing developer fees on commercial/industrial construction is based on the relationship between new residential construction and the resulting demand for commercial/industrial businesses to employ the new residents. The following analysis presents the relationship that exists between commercial/industrial development and the need for additional school facilities in the District.

A. Employee Generation Rates for Residential Development

The American Community Survey 2018-22 (ACS) identified a total of 101,683 housing units and the ACS identified 153,434 workers 16 years and older in the District's Census Tracts. This represents a ratio 1.51 of workers per housing unit. Based on this ratio, it is anticipated that each new unit of residential construction within the District will generate 1.51 employees.

B. District Resident Employees

A certain percentage of the employees living within the District will work in the District and some employees will commute to jobs outside the District. To estimate the percentage of employees that both live and work in the District, travel time to work as identified by the American Community Survey 2018-2022 is used. According to the ACS, 19.7% of all workers 16 years and older in the District's Census Tracts have a commute to work of less than 15 minutes. For purposes of this analysis, a travel time of less than 15 minutes is used to represent an employee that both lives and works within the District. The District-resident employee ratio is therefore expressed as 0.197.

C. Employee Impact Per Unit of Residential Construction

The employee to housing unit ratio of 1.51 and the District-resident employee ratio of 0.197 when multiplied, show that each new unit of residential construction within the District will generate 0.297 District-resident employees.

D. Commercial/Industrial Square Footage Per Employee

The commercial/industrial square footage per employee, or employee density, is dependent on the type of commercial/industrial use. For instance professional or office uses generally have higher employee densities than warehouse or industrial uses. Assembly Bill 181 recognized the variability in employee densities among the different types of commercial/industrial uses by allowing school districts to group development into categories and assess a fee based on specific employee densities. Assembly Bill 530 provided that school districts may choose to utilize employee density standards such as those identified by the San Diego Association of Governments (SANDAG) 1990 Traffic Generators Report to establish the number of employees per square foot of new commercial/industrial development projects. The employee density for self storage uses, while not addressed by the San Diego Traffic Generators report, 1990, is addressed in a 2012 employee density analysis recommended by SANDAG staff. The SANDAG employee densities are set forth in Table 15.

E. Commercial/Industrial Square Feet Per Residential Unit

The square feet per specific category of commercial/industrial development attributable to residential development is estimated by multiplying the District-resident employee ratio of 0.297 by the employee densities in Table 15. The number of commercial/industrial square feet generated per new housing unit is not cumulative across all employee densities; each unit generates commercial/industrial development in only one density category. It is assumed that in housing units containing more than one worker, all workers are employed in the same development category. Table 15 shows that each new residential unit generates the need for between 85 and 4,455 square feet of commercial/industrial development depending on the development category.

F. Commercial/Industrial Fee Generated Per Housing Unit

The commercial/industrial fee generated per unit of residential construction can be determined by multiplying the commercial/industrial square footage generated per residential unit by the maximum fee of \$0.24 to \$0.34 (District portion of \$0.84) per square foot. Table 15 shows that each new housing unit will generate between \$20.40 and \$1,514.70 in commercial/industrial fees depending on the development category and level of fee.

G. Maximum Justified Fee

A nexus is reached when the combined residential and commercial/industrial fees equal the school facility costs created per unit of residential construction. As set forth in **Table 14** below, each unit of residential construction will generate a 9-12 facility funding shortfall for employees that work and live in District of \$1,510.

Table 14
Projected Shortfall per Residential Unit

Grade Level	Projected School Facility Cost per Student ¹	Avg. Student Yield Rate per Housing Unit	Avg. Estimated School Facility Cost Per Housing Unit	Employee District – Resident Ratio Per Housing Unit	Projected Capital Facilities Shortfall Per Housing Unit for Employees
9-12	\$64,618	0.0786734	\$5,084	0.297	\$1,510

District Feeder School Residential Fees per Square Foot and Remaining Shortfall per Unit			
Hueneme ESD	\$2.07	\$2,534	\$2,550
Mesa Union ESD	\$1.76	\$2,154	\$2,930
Ocean View ESD	\$1.55	\$1,897	\$3,187
Oxnard ESD	\$1.76	\$2,154	\$2,930
Pleasant Valley ESD	\$2.07	\$2,534	\$2,550
Rio ESD	\$1.50	\$1,836	\$3,248
Somis ESD	\$2.07	\$2,534	\$2,550

*Estimated Costs based on Developer Fee Justification Study Table 11. Numbers are rounded.

Note: Projected Residential Fee per Unit based on average square footage 1,224 multiplied by square foot developer fee rate \$1.50 to 2.07 will generate \$1,836 to \$2,534 of \$5,084 projected school facilities costs per housing unit. Therefore, the Capital Facilities Shortfall Per Housing Unit for Employees of \$1,510 is justified.

As set forth in **Table 15** below all categories of commercial/industrial development, result in a maximum justified fee exceeding the 9-12 pro-rata fee rate of \$0.24 to \$0.34 (29% to 40% of \$0.84) per square foot as authorized by Government Code Section 65995, with the

exception of self-storage. Based on this finding, the District is justified in levying a commercial/industrial fee between \$0.24 to \$0.34.

Table 15
Commercial/Industrial Fee Analysis

Development Category	Employee Density		District-Resident Per Unit Ratio ^(b)	C/I Sq. Ft. Per Housing Unit ^(c)	C/I Fee Generated Per Housing Unit @ \$0.24-0.34 Per Sq. Ft.	Shortfall per Residential Unit for Employees ^(d)	Maximum Justified C/I Fee Per Sq. Ft. ^(e)
	Employees per 1,000 Sq. Ft. ^(a)	Sq. Ft. Per Employee ^(a)					
Office	3.51	285	0.297	85	\$ 20.40-28.90	\$ 1,510	\$17.76
Retail/Service	1.87	534	0.297	159	\$ 38.16-54.06	\$ 1,510	\$9.50
Light Industrial	3.29	304	0.297	90	\$ 21.60-30.60	\$ 1,510	\$16.78
Heavy Industrial	2.22	450	0.297	134	\$ 32.16-45.56	\$ 1,510	\$11.27
Warehouse	1.28	780	0.297	232	\$ 55.68-78.88	\$ 1,510	\$6.51
Lodging	1.13	885	0.297	263	\$ 63.12-89.42	\$ 1,510	\$5.74
Hospitals	2.75	364	0.297	108	\$ 25.92-36.72	\$ 1,510	\$13.98
Self Storage	0.07	15,000	0.297	4455	\$1069.20-1514.70	\$ 1,510	\$0.34

(a) Employee Densities: Source SANDAG 1990

(b) District-Resident Employee Per Unit Ratio: Source American Community Survey 2018-2022

(c) Sq. Ft. Per Housing Unit: District-Resident Employee Per Unit Ratio multiplied by sq. ft. per employee

(d) Based upon Estimated New School Construction Costs as set forth in Developer Fee Justification Study.

(e) Maximum Justified Fee Per Sq. Ft.: Fee amount justified without exceeding development impact.

VII. CONCLUSIONS AND RECOMMENDATIONS – LEVEL 1 STATUTORY FEE

A. Residential Developer Fees

Based on the findings set forth herein, the District meets the requirements for levying 9-12 Level 1 Statutory fees in the amount of \$1.50 to \$2.07 (based on feeder school district percentage agreement) per square foot for residential single family detached, single family attached, and multi-family construction, with the exception of any residential development that is paying mitigation through a Mello-Roos CFD special tax or by special Board approved Mitigation Agreement.

B. Commercial/Industrial Developer Fees

Based on the findings set forth in Section VI, the District meets the requirements for levying 9-12 Statutory fees in the amount of \$0.24 to \$0.34 (based on feeder school district percentage agreement) per square foot for new commercial and industrial development.

The Justification Study is hereby submitted for public review and approval by the District Board in substantiation of Developer Mitigation Fees as set forth in SB 50.

EXHIBIT A

District Map

