



# SACRAMENTO CITY UNIFIED SCHOOL DISTRICT BOARD OF EDUCATION

Agenda Item# 13.1j

**Meeting Date:** March 21, 2024

**Subject:** Approve Developer Fee Consulting Services Proposal for Updated Justification Studies Services

- Information Item Only
- Approval on Consent Agenda
- Conference (for discussion only)
- Conference/First Reading (Action Anticipated: \_\_\_\_\_)
- Conference/Action
- Action
- Public Hearing

**Division:** Facility Support Services

**Recommendation:** Review and approve the Developer Fee Consulting Services Proposal for updating the District's developer fee justification study.

**Background/Rationale:** School districts are required to prepare a Justification Study to establish: (1) that a nexus exists between new development in a school district and the need for school facilities; and (2) the amount of developer fees imposed on each type of possible development. A justification study must:

- Identify the purpose of the developer fee;
- Identify the use to which the fee is to be put;
- Determine a reasonable relationship between the fee's use and the type of development project on which the fee is imposed; and
- Determine a reasonable relationship between the need for the public facility and the type of development on which the fee is imposed.

California law outlines the ability to establish allowable fees based on State Allocation Board rates, legal parameters, and local factors. Legal requirements effective January 1, 2022 now require fee justification studies to be updated at least every eight (8) years. The District's last Justification Study was completed in 2015 and must be updated at this time.

**Financial Considerations:** The cost of the justification study will cost \$14,600 and will outline updated fees and requirements for the collection and use of developer fees.

**LCAP Goal(s):** Family and Community Empowerment; Operational Excellence

**Documents Attached:**

1. Proposal to Provide Developer Fee Consulting Services

**Estimated Time of Presentation:** NA

**Submitted by:** Chris Ralston, Assistant Superintendent of Facilities  
Nathaniel Browning, Director of Facilities

**Approved by:** Lisa Allen, Interim Superintendent



Sacramento City Unified School District  
Proposal to Provide  
Developer Fee Consulting Services

February 9, 2024

**KOPPEL & GRUBER**  
PUBLIC FINANCE

334 Via Vera Cruz, Suite 256  
San Marcos, California 92078

760-510-0290  
info@kgpf.net



February 9, 2024

*Via Email*

Mr. Nathaniel Browning  
Director of Capital Projects, Facilities, and Resource Management  
Sacramento City Unified School District  
5735 47<sup>th</sup> Ave  
Sacramento, CA 95824

**RE: PROPOSAL TO PROVIDE DEVELOPER FEE CONSULTING SERVICES**

Dear Mr. Browning:

Thank you for the opportunity to assist the Sacramento City Unified School District ("School District") by providing Developer Fee Consulting Services. Koppel & Gruber Public Finance ("K&G Public Finance") is pleased to present our proposal to prepare the Fee Justification Study ("FJS") required for the adoption of Level I School Fees.

For the School District, Lyn Gruber will be the Principal in Charge on the project and assist in the preparation of the report and will also be available to assist at School District Board meetings and/or public meetings. Douglas Floyd will act as project manager and will be the School District's day-to-day contact and will be responsible for the accurate and timely delivery of work products and attendance and participation at meetings. Scott Koppel will provide analytical assistance on the project and assist in the preparation of the report and will also be available to assist at School District Board meetings and/or public meetings.

K&G Public Finance is a California Corporation serving only local government agencies throughout the State of California and we provide similar services to many school districts. It is our objective to provide you with high quality service leading to the successful completion of the FJS. We look forward to the possibility of assisting the School District with this project. Please feel free to contact me if you have questions about our proposal. My telephone number is (760) 510-0290 and you can also e-mail me at [lyn@kgpf.net](mailto:lyn@kgpf.net)

Sincerely,

A handwritten signature in blue ink that reads "Lyn Gruber".

Lyn Gruber

CC: Ben Wangberg ([Ben-Wangberg@scusd.edu](mailto:Ben-Wangberg@scusd.edu))

# TABLE OF CONTENTS

---

- I. Company Profile..... 1
- II. Project Understanding ..... 2
- III. Scope of Services ..... 3
- IV. Timeline..... 6
- V. References ..... 7
- VI. Compensation ..... 8

Appendix  
Sample Fee Justification Study

## I. COMPANY PROFILE

---

Koppel & Gruber Public Finance (“K&G Public Finance”) is by design an entrepreneurial corporation dedicated to sustainable growth with ten (10) employees. We have been providing consulting services for school districts and other public agencies since incorporation in November of 2004. We work exclusively for public agencies and are currently providing similar services to over thirty (30) public agencies throughout California.

The founding partners of the firm, Scott Koppel and Lyn Gruber, each have nearly thirty years of experience in public finance consulting. Their expertise includes special district formation (Community Facilities District, Landscaping and Lighting Districts, and 1913 Act Assessment Districts), special district administration, feasibility studies, arbitrage rebate and municipal disclosure. Douglas Floyd, with twenty years of experience has specialized in assisting school districts with Mello-Roos Financing, annual administration, School Facilities Needs Analysis (“SFNAs”) reports and Developer Fee Justification Studies (“FJS”).

Our firm’s success is founded on providing high quality services, a personal touch, and long-term client relationships. In addition to preparing FJSs, our expertise also includes the following:

- Annual & Five-Year Developer Fee Reporting
- Community Facilities District formation
- Community Facilities District administration
- Arbitrage calculations
- School Facilities Needs Analysis
- Municipal Disclosure
- Mitigation fee calculation
- GIS Services

We understand the current challenges faced by school districts such as the costs of land acquisition and improvements, school facility construction and modernization, the grant inadequacy of the School Facilities Program and the increasing reliance by school districts on locally funded financing mechanisms to provide for their facilities needs. This increased need for funding along with the challenging real estate market also has created an environment where FJSs and SFNAs are more closely scrutinized prior to adoption. K&G Public Finance uses sound methodology and documentation to withstand this heightened scrutiny.

## II. Project Understanding

---

We understand the Sacramento City Unified School District (“School District”) a TK-12 school district, is seeking a consultant to prepare a Fee Justification Study (“FJS”) for the justification of Level I statutory fees imposed on new residential and commercial/industrial construction and reconstruction projects and evaluate if the District is eligible for School Facilities Needs Analysis (“SFNA”) for Level II and III Fees. The School District is currently educating over 43,000 students and operating approximately seventy-five (75) schools.

In order to levy and collect Level I statutory school fees on new residential and commercial/industrial construction and reconstruction, school districts must adopt a Fee Justification Study. The FJS should be completed in even numbered years after the State Allocation Board (“SAB”) escalates Level I fees. The fees were adjusted on January 24, 2024.

The FJS is required to be adopted by resolution at a public hearing after it has been made available to the public for a period of not less than ten days. Once adopted at a public hearing the Level I fee takes effect sixty days after adoption and must only be updated if a school district wants to capture new and increased statutory fees adopted by the SAB in the future years.

During the justification of the Level I fee K&G Public Finance will determine if the School District (i) meets at minimum two of the four eligibility requirements set forth in Government Code Section 65995.5(b)(3), and (ii) is likely to be able to justify Alternative School Fees also known as Level II and Level III Fees. If it is determined that Alternative School Fees are justifiable, with the School District’s permission, K&G Public Finance will prepare the School Facilities Needs Analysis.

As required by statute, in order for the School District to impose Alternative School Fees, on new residential construction beyond the maximum statutory Level I school fees, an SFNA must be prepared and adopted by the School District each year. The SFNA provides the factual basis for justifying the imposition of the Alternative School Fees and the level at which they may be levied and must be prepared in accordance with the California Education Code Section 17620 and Government Code beginning with Section 65995.

In October 2023, the Governor signed AB 516 which in part, amends certain sections of the Government code relating to developer fees and will add requirements to *future* Annual and Five-Year reporting. The bill requires updates on construction progress of projects previously provided in the annual report and if projects haven’t commenced, the reason for the delay and a revised approximate date that construction will commence. Additionally, if refunds were provided, the number of persons or entities that received refunds. While the request for proposals does not specifically request assistance with the Annual and Five-Year Reports, we can offer that service as well.



### III. Scope of Services

---

#### Fee Justification Study

K&G Public Finance will perform the following scope of work in relation to the Fee Justification Study:

1. Prepare an FJS for the levy of a Residential Development School Fee and a Commercial/Industrial Development School Fee for the School District to consider pursuant to the provisions of Section 17620 and subdivision (e) of Section 17621 of the Education Code, Section 65995 and Section 66001 of the Government Code, and Assembly Bill (“AB”) 181. The Residential Development School Fee and Commercial/Industrial Development School Fee Analyses will be included in one report. The FJS will discuss and make determination as to the following:

- a. Residential Development School Fee
  - i. **Project the Number of Unhoused Students:** this task involves calculating student generation rates by housing type and school level utilizing student enrollment data and property and housing data sources. The property and housing data utilized typically includes one or more of the following: County property characteristic information, U.S. Census Bureau data, city and/or county general plans and/or building permit information. The student generation rates are then multiplied by the number of residential units by housing type anticipated to be developed in the next ten (10) years (“Projected Development”). K&G Public Finance uses information from local planning agencies or other sources including but not limited to tract map and specific plan information, and housing unit projections to estimate Projected Development;
  - ii. **Determine Current Student Enrollment and Calculation of Existing Facilities Student Capacity:** the Study uses student enrollment reported on the most recent October CALPADs. To determine the number of students that can be housed at existing school facilities, K&G Public Finance (a) uses capacity information reported on the School District’s most recently completed SAB Form 50-02 and updates based on information provided by the School District or the Office of Public School Construction (OPSC), or (b) calculates facilities capacity by determining the number of classrooms utilized by the School District and their corresponding loading standards;
  - iii. **Identify School Facility Needs to Accommodate New Growth:** a comparison of current student enrollment to existing student capacity will be conducted to determine whether any excess seats exist. The number and type of school facilities needed to accommodate projected unhoused students as determined in subtask (a)(i) will then be estimated.
  - iv. **Estimate Costs of Providing School Facilities:** the FJS will estimate costs of constructing, modernizing or replacement of school facilities required



- to accommodate projected unhoused students generated by new residential development. Cost estimates are generally based on information provided by the School District such as their facilities master plan and/or cost information provided by OPSC;
- v. **Determine the School Facilities Impact for Residential Development:** the FJS will calculate the estimated school facilities impact per square foot of new residential development by housing type.
- b. Commercial/Industrial Development School Fee
    - i. **Determine Employment Generated from Commercial/Industrial Development:** as recommended by statute, employee generation estimates are based on information set forth in the San Diego Traffic Generator Study published by the San Diego Association of Governments (SANDAG).
    - ii. **Determine New Residential Impact:** this task estimates for each commercial/industrial category the number of new households within the School District impacted by commercial/industrial development that will create necessity for school facilities. The estimates are derived using employment generation information determined in subtask (b)(i) as well as information generally provided by but not limited to the California Employment Development Department, the California Department of Finance, and the U.S. Census Bureau.
    - iii. **Student Generation Rates:** student generation rates determined in task (a)(i) will be used in conjunction with the new residential impacts calculated in task (b)(ii) above to estimate the student generation impact for each commercial/industrial category by school level.
    - iv. **Determine the school facilities impact on Commercial/Industrial Development:** the FJS will calculate the estimated net school facilities impact per square foot of commercial/industrial development by development type. The school facilities impacts will be calculated using school facilities cost information derived from task (a)(iv) and student generation rates determined in task (b)(iii) above, and may be adjusted by any residential fee impacts determined based on residential school fees adopted by the School District.
  - c. Government Code Section 66600 Compliance: Discuss and satisfy the requirements specified by Government Code Section 66000 et seq. for the Residential Development School Fee and the Commercial/Industrial Development School Fee. The specific findings required are as follows:
    - i. Identify the purpose of the fee;
    - ii. Identify the use to which the fee is to be put;
    - iii. Determine there is a reasonable relationship between the fee's use and the type of development project on which the fee is imposed;

- iv. Determine that there is a relationship between the amount of the fee and the cost, or portion of the costs, of the school facility attributable to the development on which the fee is imposed; and
  - v. Provide procedures for depositing, investing, and accounting for the Residential School Fees and the Commercial/Industrial School Fees.
2. Work with the School District's legal counsel to comply with new legislation and address the court's concerns in recent case law.
3. Assist the School District in determining the eligibility for Alternative School Fees and if eligible we will provide a separate timeline, scope of services and fee for the preparation of the School Facilities Needs Analysis.
4. Participate in conference calls as necessary throughout the FJS preparation process. Develop effective channels of communication to facilitate the project moving forward in a successful and timely manner. This includes all telephone calls and emails throughout the FJS process.
5. Work with the School District legal counsel to review the Notices of the Public Hearing made available to the public and Resolution Approving the School Fees.
6. Attend School District meetings where the consideration of the resolution adopting the FJS is on the agenda. Speak at the Public Hearing meetings and/or other public meetings if required.
7. Respond to any comments received by the School District from outside agencies or other parties regarding the FJS.
8. Assist the School District in any challenges to the FJS from outside agencies or other parties, if necessary. ***This item will be charged on an hourly basis and is not included in the flat fee provided in the Compensation Section.***

## IV. TIMELINE

While K&G Public Finance acknowledges the School District's current targeted adoption date of April 4, 2024, in our experience preparation of a Fee Justification Study requires at minimum 60 days with a new school district client. Based on our experience and understanding of the scope of work, a proposed timeline is included below which targets the May 2, 2024 Board Meeting date.

### **Fee Justification Study for Sacramento City Unified School District** **Sample Project Timeline**

As of February 9, 2024

Board= Sacramento City Unified School District Board of Education

KGPF= Koppel & Gruber Public Finance

Date	Project Task
1/24/2024	SAB Increased Level 1 Fee
2/16/2024	Contract Approval
2/16/2024	KGPF sends Information Request to District
2/23/2024	District provides requested data to KGPF
3/28/2024	KGPF sends Draft Report to District (Agenda item and Resolution included)
4/4/2024	District Comments on Draft due to KGPF
4/11/2024	Final Report delivered
4/18/2024	District Distributes Notice of Public Hearing at least 14 days prior to Public Hearing to those who submitted written requests
4/22/2024	School District makes FJS available to public; District publishes Notice of Public Hearing in at least one newspaper of general circulation
4/26/2024	District publishes second Notice of Public Hearing in at least one newspaper of general circulation
5/2/2024	Board Meeting/Public Hearing to Adopt Fee Study
7/1/2024	New School Fees become effective 60 days after adoption

## V. REFERENCES

---

Below are three references of school districts.

Fremont Unified School District	
<b>Contact</b>	Kathy Moyer, Secretary, Accounting Services
<b>Telephone</b>	510-657-2350
<b>Address</b>	4210 Technology Drive Fremont, CA 95438
<b>Services</b>	Fee Justification Studies and Annual & Five -Year Reporting since 2020.

La Mesa-Spring Valley Unified School District	
<b>Contact</b>	Seth Boomgarden, Director of Fiscal Services
<b>Telephone</b>	619-668-5700 Ext. 6404
<b>Address</b>	4750 Date Avenue La Mesa, CA 91942
<b>Services</b>	Fee Justification Studies since 2021.

Perris Union High School District	
<b>Contact</b>	Candace Reines, Deputy Superintendent Business Services
<b>Telephone</b>	951-943-6369 Ext. 101
<b>Address</b>	155 East Fourth Street Perris, CA 92570
<b>Services</b>	Fee Justification Studies, School Facilities Needs Analyses, Annual and Five-Year Reporting, Community Facilities District administration, continuing disclosure, and arbitrage calculations since 2009.

## VI. COMPENSATION

---

We will provide the Scope of Services described above for the fees outlined below.

Services	Fee
Fee Justification Study	\$14,600

The fee above includes all work required for the preparation of and adoption of the FJS including time required for conference calls, telephone calls and emails, with the exception of Item 8 under the Fee Justification Study scope which would be subject to the Additional Services section. We will provide pricing and scope of services if the School District is eligible to charge Alternative School Fees.

The quoted fees will be subject to an annual Consumer Price Index increase for Sacramento-Roseville-Arden-Arcade area, CA All Urban Consumer Price Index (All Items) beginning July 2025 if a multi-year contract is issued.

### Expenses

In addition to fees for services, K&G Public Finance shall be reimbursed for direct expenses, including travel, mileage, photocopying, data sources, courier services, overnight delivery, and long-distance telephone expenses. These expenses are billed at our cost; we **do not** charge an administrative fee or additional expense mark up.

### Billing Structure

During the project, K&G Public Finance shall submit monthly invoices to the School District providing details of services rendered and expenses incurred.

### Additional Services

If authorized by the School District, K&G Public Finance will provide additional services not included in the above scope of services **(with the exception of Item 8 under the Fee Justification Study scope which would be subject to this section)** at the hourly rates provided below unless otherwise agreed upon between the School District and K&G Public Finance.

Title	Rate
Principal	\$285
Vice President	250
Senior Analyst	220
Analyst	160
Production/Administration	100

APPENDIX  
SAMPLE FEE JUSTIFICATION STUDY



## **2022 SCHOOL FEE JUSTIFICATION STUDY**

**MARCH 10, 2022**

**KOPPEL & GRUBER**  
PUBLIC FINANCE

334 VIA VERA CRUZ, SUITE 256  
SAN MARCOS  
CALIFORNIA 92078

T. 760.510.0290  
F. 760.510.0288

**FREMONT UNIFIED SCHOOL DISTRICT**  
4210 TECHNOLOGY DRIVE, FREMONT, CA 94538  
T. (510) 657-2350



# TABLE OF CONTENTS

---

<b>EXECUTIVE SUMMARY</b> .....	1
RESIDENTIAL DEVELOPMENT .....	1
COMMERCIAL/INDUSTRIAL DEVELOPMENT.....	2
<b>SECTION I. LEGISLATION AND LEGAL REQUIREMENTS</b> .....	4
<b>SECTION II. PROJECTED UNHOUSED STUDENTS AND FACILITY REQUIREMENTS</b> .....	6
A. SCHOOL DISTRICT CAPACITY AND CURRENT STUDENT ENROLLMENT .....	6
B. PROJECTED UNHOUSED STUDENTS.....	7
C. FACILITY COSTS AND ESTIMATED PER STUDENT COST .....	10
<b>SECTION III. PROJECTED IMPACT OF RESIDENTIAL DEVELOPMENT</b> .....	12
<b>SECTION IV. COMMERCIAL/INDUSTRIAL SCHOOL IMPACT ANALYSIS</b> ..	14
A. EMPLOYEE GENERATION .....	14
B. RESIDENTIAL IMPACT .....	15
C. NET IMPACT PER COMMERCIAL/INDUSTRIAL SQUARE FOOT .....	18
<b>SECTION V. OTHER CONSIDERATIONS</b> .....	21
A. COMMERCIAL/INDUSTRIAL DEVELOPMENT NOT IN PRESCRIBED CATEGORIES .....	21
B. AGE-RESTRICTED (SENIOR) HOUSING .....	21
<b>SECTION VI. REDEVELOPMENT</b> .....	22
<b>SECTION VII. GOVERNMENT CODE SECTION 66000</b> .....	23

## **APPENDICES**

- APPENDIX A – COMMERCIAL/INDUSTRIAL DEVELOPMENT DESCRIPTIONS
- APPENDIX B – FACILITIES CAPACITY UPDATE
- APPENDIX C – ENROLLMENT SUMMARY
- APPENDIX D – STUDENT GENERATION RATES

## EXECUTIVE SUMMARY

---

Education Code Section 17620 authorizes the governing board of a school district to levy school fees to offset the impacts to school facilities from new residential and commercial/industrial construction and reconstruction. In order to levy Level I fees (statutory fees), a school district must prepare and adopt a school fee justification study pursuant to the provisions of Education Code Section 17620 and Sections 65995 and 66001 of the Government Code. The school fee justification study serves as the basis for justifying the levy of Level I fees and presents and documents the nexus findings required by State law.

This School Fee Justification Study (“Study”) has been prepared for the Fremont Unified School District (“School District”) to demonstrate the relationship between new residential and commercial/industrial development and the School District’s need for the construction and/or reconstruction of school facilities, the cost of the school facilities, and the per square foot amount of Level I fees (“School Fees”) that may be levied by the School District on residential and commercial/industrial development in accordance with applicable law.

The School District serves areas within the City of Fremont and currently educates a total student population of approximately 33,873 transitional kindergarten (TK) through twelfth grade students.

The State Allocation Board (“SAB”) reviews and may adjust the maximum authorized School Fees every January in even-numbered years. The SAB increased the Level I fee on February 23, 2022, and the maximum School Fees authorized by Education Code Section 17620 are currently \$4.79 per square foot for residential construction/reconstruction and \$0.78 per square foot for commercial/industrial construction. The School District is currently authorized to collect Level I school fees in the amount of \$4.08 per square foot for residential construction/reconstruction and up to \$0.66 per square foot for commercial/industrial construction. Based on the findings presented in this Study, the School District is justified in collecting Level I school fees at an amount equal to the maximum authorized School Fees for residential construction/reconstruction and commercial/industrial development<sup>1</sup>. The findings are summarized below:

### **RESIDENTIAL DEVELOPMENT**

New residential development in the School District is projected over the next ten (10) years and beyond. Based on historical student generation rates, new residential development that is not under a mitigation agreement could generate an estimated 620 new students over the next ten (10) years. In addition, based on (i) the condition and adequacy of existing capacity, (ii) the service and educational goals of the School District, and (iii) the need to maintain the existing level of service, the projected student enrollment and additional factors support the need for the construction, reconstruction and refurbishment of school facilities at existing sites.

The cost impact per square foot shown in Table E-1 exceeds the current maximum authorized residential School Fee of \$4.79; therefore, the School District is reasonably justified in

---

<sup>1</sup> With the exception of new commercial/industrial development categorized as Rental Self-Storage facilities, as further described in this Study.

levying the Level I school fees in an amount up to but not exceeding \$4.79 per square for residential development (“Applicable Residential School Fee”).

**TABLE E-1  
RESIDENTIAL SCHOOL FACILITIES COST IMPACTS/  
APPLICABLE SCHOOL FEE PER SQUARE FOOT**

IMPACT PER SQUARE FOOT	APPLICABLE RESIDENTIAL SCHOOL FEE PER SQUARE FOOT
\$6.82	<b>\$4.79</b>

**COMMERCIAL/INDUSTRIAL DEVELOPMENT**

As commercial/industrial properties develop new jobs are created. Many of the employees working at the new jobs will move into the School District boundaries, thereby increasing the need for new residential development and further impacting the School District’s facilities. School Fees may be imposed on commercial/industrial development if the school fees collected on residential development are insufficient to provide adequate school facilities for students generated as a result of new development and nexus findings are presented that justify the imposition of the commercial/industrial school fee.

Section 17621(e)(1)(B) of the Education Code requires that the Study determine the impact of the increased number of employees anticipated to result from commercial/industrial development upon the cost of providing school facilities within the School District. This code section further recommends that employee generation estimates be based on the applicable employee generation estimates set forth in the January 1990 edition of “San Diego Traffic Generator Study” (“Traffic Study”), a report by San Diego Association of Governments (“SANDAG”). The school facilities cost impacts per commercial/industrial square foot as determined in this Study are shown in Table E-2 by commercial/industrial land use type (each commercial/industrial category is further described in Appendix “A”). The cost impacts per square foot for each category of commercial/industrial development are equal to or exceed the maximum authorized School Fee of \$0.78 per square foot, except for Rental Self-Storage development. Therefore, the School District is justified in levying commercial/industrial School Fees on new commercial/industrial development in an amount up to but not exceeding the maximum authorized School Fee of \$0.78 per square foot (“Applicable Commercial/Industrial School Fees”). The Applicable Commercial/Industrial School Fees may be imposed on new commercial/industrial construction or reconstruction classified as Rental Self-Storage, up to the respective net cost impact per square foot determined herein.

**TABLE E-2**  
**COMMERCIAL/INDUSTRIAL SCHOOL FACILITIES COST IMPACTS/**  
**APPLICABLE SCHOOL FEE PER SQUARE FOOT**

COMMERCIAL/INDUSTRIAL CATEGORY	IMPACT PER SQUARE FOOT	APPLICABLE SCHOOL FEE PER SQUARE FOOT
Banks	\$2.16	<b>\$0.78</b>
Community Shopping Center	\$1.17	<b>\$0.78</b>
Neighborhood Shopping Center	\$2.14	<b>\$0.78</b>
Industrial Business Parks	\$2.68	<b>\$0.78</b>
Industrial Parks/Warehousing/Manufacturing	\$1.03	<b>\$0.78</b>
Rental Self-Storage	\$0.05	<b>\$0.05</b>
Research & Development	\$2.33	<b>\$0.78</b>
Hospitality (Lodging)	\$0.86	<b>\$0.78</b>
Commercial Offices (Standard)	\$3.66	<b>\$0.78</b>
Commercial Offices (Large High Rise)	\$3.47	<b>\$0.78</b>
Corporate Offices	\$2.05	<b>\$0.78</b>
Medical Offices	\$3.25	<b>\$0.78</b>

## SECTION I. LEGISLATION AND LEGAL REQUIREMENTS

---

This section discusses the legislative history of the Level I Fee.

Assembly Bill (“AB”) 2926 enacted by the State in 1986, also known as the “1986 School Facilities Legislation” granted school districts the right to levy fees in order to offset the impacts to school facilities from new residential and commercial development. Originally set forth in Sections 53080 and 65995 of the Government Code, AB 2926 authorized statutory school fees to be levied, commencing January 1, 1987, in the amount of \$1.50 per square foot of new residential assessable space and \$0.25 per square foot of enclosed commercial or industrial assessable space. AB 2926 also provided for an annual increase of the statutory fees based on the Statewide cost index for Class B construction, as determined by the SAB. The provisions of AB 2926 have since been amended and expanded.

AB 1600 was enacted by the State legislature in 1987 and created Government Code Sections 66000 *et seq.* These sections require a public agency to satisfy the requirements as further discussed in Section VII herein when establishing, increasing or imposing a fee as a condition of approval for a development project.

AB 181, enacted in 1989, established new requirements for school districts levying school fees and also re-codified Government Code Section 53080 *et seq.* as Education Code Section 17620 *et seq.* The additional provisions established by AB 181 imposed more stringent nexus requirements which must be satisfied by school districts prior to levying school fees, especially with respect to commercial/industrial school fees. Additionally, AB 181 provided that the maximum school fees for residential and commercial/industrial development be subject to an increase every two (2) years rather than annually.

In 1998, Governor Wilson signed into law Senate Bill 50 (“SB 50”), the Leroy F. Greene School Facilities Act of 1998, which reformed State’s School Building Program and developer school fee legislation. A significant provision of SB 50 provides school districts the option of adopting alternative school fees (also known as Level II and Level III fees) in excess of the Level I fee upon meeting certain requirements. SB 50 also placed a \$9.2 billion State Bond measure on the November 3, 1998 ballot (Proposition 1A). With the passage of Proposition 1A in November 1998, SB 50 became operative.

SB 50 also limited the power of cities and counties to require mitigation of school facilities impacts specifically as they relate to the capacity of schools as a condition of approving new development. Prior case law permitted school districts to collect mitigation fees greater than the statutory amount in order to address school capacity.

On November 5, 2002, California voters passed Proposition 47, which authorized the issuance of \$13.05 billion in State bonds and also enacted AB 16, which provided for additional reformation of the School Building Program. AB 16, among other items, clarified that if the SAB is no longer approving apportionments for new construction due to the lack of funds available for new school facilities construction, a school district may increase its Level II Fee to the Level III Fee. With the issuance of the State bonds authorized by the passage of Proposition 47, this section of AB 16 became inoperable.

Furthermore, Proposition 55 was approved on March 2, 2004, which authorized the sale of \$12.3 billion in State bonds. In addition, California voters approved Proposition 1D in the general election held on November 7, 2006. Proposition 1D authorized the issuance of \$10.4 billion in State bonds.

Most recently, California voters approved Proposition 51 (the California Public School Facility Bonds Initiative) in the general election held on November 8, 2016, authorizing the issuance of \$9 billion in bonds to fund the improvement and construction of school facilities for TK-12 schools and community colleges.

## **SECTION II. PROJECTED UNHOUSED STUDENTS AND FACILITY REQUIREMENTS**

---

The objective of this Study is to determine if a nexus exists between future residential and commercial/industrial development and the need for school facilities. In addition, the Study aims to identify the costs of such required school facilities and determine the amount of School Fees that can be justifiably levied on residential and commercial/industrial development according to the estimated impacts caused by such development. This section evaluates whether existing school facilities can accommodate students generated from future residential development, projects student enrollment based on anticipated residential growth, and estimates the costs of school facilities required to accommodate new residential growth. The findings determined in this section are used in following sections to evaluate the cost impact per square foot for new residential and commercial/industrial property. Although many of the figures in this section are primarily derived from residential development projections and impacts, they are adjusted in Section IV. to evaluate the impact of commercial/industrial development.

### **A. SCHOOL DISTRICT CAPACITY AND CURRENT STUDENT ENROLLMENT**

The School District's existing school facilities capacity and student enrollment were evaluated in order to determine if there is available capacity to house students generated by new residential and commercial/industrial development.

The School District currently operates twenty-nine (29) elementary schools, two (2) middle schools, three (3) junior high schools, and six (6) high schools. Pursuant to Education Code Section 17071.10, these facilities have a capacity to accommodate 37,101 students. Pursuant to Education Code Section 17071.30 and SAB Regulation 1859.51, portable classrooms were not included in the calculation to the extent they are (i) leased through the State Relocatable Classroom Program, (ii) leased for a period of less than five (5) years, (iii) leased when needed as interim housing (project basis), or (iv) represent the number of portables that exceed 25% of the School District's permanent classrooms. Appendix "B" provides a calculation of the existing facilities capacity.

Based on enrollment information as of October 2021, the total student enrollment of the School District is 33,873 students. A summary of the student enrollment data is included in Appendix "C". Available facilities capacity is calculated by subtracting the October 2021 student enrollment from existing school facilities capacity for each school level. This operation results in available capacity at the elementary school, junior high and high school levels. The capacity calculation is shown in Table 1.



**TABLE 1**  
**FACILITIES CAPACITY AND STUDENT ENROLLMENT**

SCHOOL LEVEL	EXISTING FACILITIES CAPACITY <sup>1</sup>	STUDENT ENROLLMENT (OCTOBER 2021)	AVAILABLE/ (DEFICIT) CAPACITY
Elementary School (TK-6)	20,123	18,256	1,867
Junior High School (7-8)	5,482	5,037	445
High School (9-12)	11,496	10,580	916
<b>TOTAL</b>	<b>37,101</b>	<b>33,873</b>	<b>3,228</b>

<sup>1</sup> Existing Facilities Capacity includes capacity at the Lila Bringham Elementary School, for which construction has been completed, and is expected to open to students in the 2022/23 school year.

**B. PROJECTED UNHOUSED STUDENTS**

**1. Projected Residential Units**

To estimate the projected units, Koppel & Gruber Public Finance (“K&G Public Finance”) obtained and compiled information from the City of Fremont (“City”) Planning Division and the City Building & Safety Division, including, but not limited to: (i) a list of residential projects planned, approved and under construction and (ii) building permit records. Such information was used to project residential development by housing type. Based on the information, it is estimated the School District could experience the development of an estimated 5,116 residential units over the next ten (10) years (“Projected Units”).

The School District has entered into mitigation agreements with certain property owners and/or developers, whereby the terms of the mitigation agreements require mitigation payments in lieu of paying School Fees. Many of the Projected Units are located within areas subject to mitigation agreements. Those Projected Units subject to such agreements have been identified and/or estimated and excluded from the calculation. This Study conservatively assumes for purpose of analysis that the agreements fully offset the impact of the developments governed by those agreements, regardless of whether the agreements in fact provide full mitigation and therefore those projected units are deemed Mitigated Projected Units.

The determination of the Mitigated Projected Units and Unmitigated Projected Units is summarized by residential category in Table 2. The types of residential units considered include (i) single family detached (“SFD”), (ii) single family attached (“SFA”), and (iii) multi-family units (“MF”). Units classified as SFD are those units with no common walls; SFA are those units sharing a common wall each having a separate and unique assessor’s parcel (e.g. townhouses, condominiums, etc.); and MF are those units which share a single assessor’s parcel and share a common wall (e.g. apartments, duplexes, etc.).

**TABLE 2  
PROJECTED UNITS BY RESIDENTIAL CATEGORY**

RESIDENTIAL CATEGORY	TOTAL PROJECTED UNITS	MITIGATED PROJECTED UNITS	UNMITIGATED PROJECTED UNITS
Single-Family Detached (SFD)	63	28	35
Single-Family Attached (SFA)	1,023	649	374
Multi-Family (MF)	4,030	1,237	2,793
<b>TOTAL</b>	<b>5,116</b>	<b>1,914</b>	<b>3,202</b>

**2. Student Generation Rates**

In order to calculate student generation rates (“SGRs”), K&G Public Finance obtained building permit data from the City as of December 31, 2021. Parcels in the database were classified by unit type (SFD, SFA, MF) and residential parcels constructed during the past five (5) years were extracted. A summary of the SGRs determined is shown in Table 3. A detailed calculation of the SGRs is shown in Appendix “D” of this Study.

**TABLE 3  
STUDENT GENERATION RATES**

SCHOOL LEVEL	SFD UNITS	SFA UNITS	MF UNITS
Elementary School (TK-6)	0.3676	0.1558	0.1369
Junior High School (7-8)	0.0933	0.0252	0.0214
High School (9-12)	0.2140	0.0384	0.0264
<b>TOTAL</b>	<b>0.6749</b>	<b>0.2194</b>	<b>0.1847</b>

**3. Projected Student Enrollment**

Projected student enrollment was determined by multiplying the SGRs in Table 3 by the number of Unmitigated Projected Units shown in Table 2. A total of 620 students are estimated to be generated from Unmitigated Projected Units. The projected student enrollment is summarized by school level in Table 4.

**TABLE 4  
PROJECTED STUDENT ENROLLMENT FROM NEW HOUSING  
BY SCHOOL LEVEL**

SCHOOL LEVEL	TOTAL PROJECTED STUDENT ENROLLMENT	PROJECTED STUDENT ENROLLMENT FROM MITIGATED UNITS	PROJECTED STUDENT ENROLLMENT FROM UNMITIGATED UNITS
Elementary School (TK-6)	733	280	453
Junior High School (7-8)	117	45	72
High School (9-12)	159	64	95
<b>TOTAL</b>	<b>1,009</b>	<b>389</b>	<b>620</b>

#### 4. Projected Unhoused Students

As shown in Table 1, facilities capacity exceeds enrollment at the elementary school, junior high and high school levels based on current student enrollment and existing facilities capacity on a School District-wide basis. The available seats exist at facilities that will house projected student enrollment from Mitigated Units and projected student enrollment from Unmitigated Units within the projection timeframe of this Study (10 years) and beyond.

In November 2021, a 2021/22 Demographics and Enrollment Projections was completed by SchoolWorks, Inc., and presents historical student enrollment information and a forecast of student enrollment over the six-year period ending in 2027/28 (the “2021 Forecast”). Per findings made in the 2021 Forecast, the School District’s student enrollment could decline across school levels to a total student population of approximately 30,987 by 2027/28<sup>1</sup>. Should the changes in enrollment persist in a downward trajectory as projected in the 2021 Forecast, the number of available seats could increase given current facilities capacity.

While these findings indicate the School District’s collective capacity per school level is available to accommodate projected students from new development over the course of the planning period, the analysis doesn’t consider (i) the availability of capacity within areas of the School District where a greater and disproportionate amount of new development is expected (ii) the condition and adequacy of existing capacity, (iii) the service and educational goals of the School District, and (iv) that the capacity reported in Table 1 includes seats funded by Mitigated Units, which are generally first reserved for students generated by those units.

As further described in this Study, capital improvements are necessary for the long-term use to adequately house the existing student population and future enrollment from new housing at all school levels. The facilities needs exist regardless of the availability of capacity to house student enrollment, inclusive of student enrollment generated from new development. Therefore, for the purpose of this analysis, projected student enrollment from Unmitigated Units (“Projected Student Enrollment”) has not been adjusted by available capacity and student enrollment attributable to new housing that requires a seat (facilities), including new facilities and/or facilities to be modernized or reconstructed for their continued useful life (“Projected Unhoused Students”) is equal to Projected Student Enrollment.

---

<sup>1</sup> It should be noted that findings documented by the School District, including information shown in Table 3 herein, indicate student generation rates from new housing remain consistently strong and have generally increased over the past several years, despite recent downward trends in overall student enrollment. For example, student generated rates for SFD units were reported as 0.6033 and 0.6178 in the School District’s School Facilities Needs Analyses dated March 8, 2019 and March 2, 2020, respectively, and 0.6749 in this Study, dated March 8, 2022.

Table 5 shows the number of Projected Unhoused Students at each school level.

**TABLE 5  
PROJECTED UNHOUSED STUDENTS**

SCHOOL LEVEL	PROJECTED STUDENT ENROLLMENT FROM UNMITIGATED UNITS	AVAILABLE SEAT ADJUSTMENT <sup>1</sup>	PROJECTED UNHOUSED STUDENTS
Elementary School (TK-6)	453	0	453
Junior High School (7-8)	72	0	72
High School (9-12)	95	0	95
<b>TOTAL</b>	<b>620</b>	<b>0</b>	<b>620</b>

<sup>1</sup> No adjustment for available seats has been made due to needed capital improvements to adequately house the existing student population and future enrollment from new housing at all school levels.

## C. FACILITY COSTS AND ESTIMATED PER STUDENT COST

### 1. Facilities Costs

Government Code Section 66001 (g) allows School Fees to include the costs attributable to the increased demand for public facilities reasonably related to the development project(s) in which the fee is imposed in order to (1) refurbish existing facilities to maintain the existing level of service or (2) achieve an adopted level of service that is consistent with the general plan. In 2014, the School District conducted a Long-Range Facilities Plan (“2014 Facilities Plan”), which identified the facilities needs of the School District, and focuses on improvements that are necessary to provide adequate housing and the continued use of the School District’s existing facilities. The 2014 Facilities Plan also provided an estimate of the costs to fund the proposed improvement projects, which amounted to \$1,627,157,000 in 2014 dollars.

The primary source of funding for the projects is expected from general obligation bond sales issued under the School District’s Measure E bond authorization. Measure E was a local bond measure approved by the voters on June 3, 2014 and authorized the School District to issue up to \$650,000,000 in bonds to finance capital improvement projects throughout the School District (“Measure E Authorization”). As of the date of this Study, the School District has issued four series of bonds under the Measure E Authorization to finance new capital improvement projects, and one series of refunding bonds, for a combined total of \$534,750,000. As of November 2021, the School District has budgeted and allocated the remaining funds to completed and in-progress projects utilizing Measure E Authorization funds.

The 2014 Facilities Plan demonstrates capital improvement projects are necessary for the long-term use and adequate housing of student enrollment at the School District’s existing facilities. The facilities needs exist regardless of the availability of capacity to house student enrollment, inclusive of student enrollment generated from new development; therefore facilities capacity available for Projected Student Enrollment is deemed inadequate. Revenues from the imposition the Applicable School Fees are intended (i) to help bridge the funding gap between (a) monies available from general obligation bond proceeds, including funding from the Measure E Authorization, or other

sources, and (b) the remaining estimated costs of the capital improvement projects outlined in the 2014 Facilities Plan and (ii) other project costs not specified in the 2014 Facilities Plan.

## 2. Estimated Cost per Student

The estimated cost per student to provide adequate school facilities to house Projected Student Enrollment was derived from the estimated costs of projects at specific school sites as outlined in the 2014 Facilities Plan in addition to other planned expenditures. The total eligible costs were then divided by the existing facilities capacity to determine the total Cost per Student/Seat. This determination is shown in Table 6.

**TABLE 6  
FACILITIES COST IMPACT PER SEAT/STUDENT**

SCHOOL LEVEL	ELIGIBLE COSTS <sup>1</sup>	EXISTING FACILITIES CAPACITY <sup>2</sup>	FACILITIES COST IMPACT PER SEAT/STUDENT
Elementary School (TK-6)	\$648,820,567	20,123	\$32,243
Junior High School (7-8)	\$293,343,235	5,482	\$53,510
High School (9-12)	\$525,186,153	11,496	\$45,684

<sup>1</sup> Eligible costs include: (i) costs outlined in the 2014 Facilities Plan for 21<sup>st</sup> century learning environments, new and replacement classrooms, and multi-use rooms and technology and (ii) scheduled debt service payments on outstanding certificates of participation issued to acquire sites for school facilities. The 2014 Facilities Plan costs are adjusted to 2022 dollars by applying the percentage change in the State of California SAB Approved Construction Cost Index.

<sup>2</sup> Includes capacity at Lila Bringhurst Elementary School.

## SECTION III. PROJECTED IMPACT OF RESIDENTIAL DEVELOPMENT

The following section presents the school facility impact analysis for new residential development and provides a step-by-step calculation of the estimated per residential square foot cost impact.

The proposed capital improvement projects outlined in the 2014 Facilities Plan are recommended because the existing facilities require upgrade or replacement for their continued long-term use, and such upgrades will benefit both existing student enrollment and student enrollment generated as a result of new residential construction; thus it is deemed reasonable and appropriate to include estimated costs as described in Section II.B when evaluating the impact per square foot as a result of Projected Unhoused Students.

To determine the school facilities cost impact per square foot of residential development, first the Facilities Cost Impact per Seat/Student determined in Table 6 is multiplied by the Projected Unhoused Students as shown in Table 5 for each school level. The result of this computation is shown in Table 7 and reflects the estimated school facilities cost impact to house Projected Unhoused Students.

**TABLE 7  
TOTAL FACILITIES COST IMPACT**

SCHOOL LEVEL	PROJECTED UNHOUSED STUDENTS	FACILITIES COST IMPACT PER SEAT/STUDENT	TOTAL FACILITIES COST IMPACT
Elementary School (TK-6)	453	\$32,243	\$14,606,079
Junior High School (7-8)	72	\$53,510	\$3,852,720
High School (9-12)	95	\$45,684	\$4,339,980
<b>TOTAL</b>			<b>\$22,798,779</b>

The total facilities cost impact shown in Table 7 above was then divided by the number of Unmitigated Projected Units shown in Table 2 to determine the school facilities cost per residential unit. The costs per residential categories are shown in Table 8.

**TABLE 8  
SCHOOL FACILITIES COST PER RESIDENTIAL UNIT**

TOTAL FACILITIES COST IMPACT	UNMITIGATED PROJECTED UNITS	FACILITIES COST IMPACT PER RESIDENTIAL UNIT
\$22,798,779	3,202	<b>\$7,120</b>

The school facilities cost impact per residential square foot was calculated by dividing the school facilities cost per residential unit determined in Table 8 by the average square footage of each residential unit type. This calculation is shown in Table 9. A review of historical development records from the City, including parcel attribute data, building permit records and additional detail as requested, along with a review of planned unit sizes for new residential projects was used to estimate the average square footage.

**TABLE 9**  
**SCHOOL FACILITIES COST PER RESIDENTIAL SQUARE FOOT**

FACILITIES COST IMPACT PER RESIDENTIAL UNIT	WEIGHTED AVERAGE SQUARE FOOTAGE	FACILITIES COST PER RESIDENTIAL SQUARE FOOT
\$7,120	1,044	<b>\$6.82</b>

The school facilities impact per residential square foot determined in Table 9 is greater than the current authorized residential School Fees of \$4.79 per square foot; therefore, the School District is justified in levying up to but not exceeding the authorized amount for residential construction and reconstruction.



## SECTION IV. COMMERCIAL/INDUSTRIAL SCHOOL IMPACT ANALYSIS

---

The following section presents the school facilities impact analysis for new commercial/industrial development and provides a step-by-step calculation of the estimated per commercial/industrial square foot cost impact.

### A. EMPLOYEE GENERATION

In the course of making the nexus findings to justify School Fees levied on commercial/industrial development, Education Code Section 17621(e)(1)(B) requires that the Study determine the impact of the increased number of employees anticipated to result from commercial/industrial development upon the cost of providing school facilities within the School District. As mentioned in the Executive Summary, for purposes of making such determination this code section further recommends that the employee generation estimates be based on the applicable estimates set forth in the Traffic Study published by SANDAG.

The employee generation estimates per 1,000 square feet of development derived from the Traffic Study are listed by commercial/industrial land use category in Table 10. The land use categories listed are based on those categories described in the Traffic Study and include all land uses recommended by the provisions of Education Code Section 17621(e)(1)(B).

**TABLE 10**  
**EMPLOYEE GENERATION PER 1,000 SQUARE FEET**  
**OF COMMERCIAL/INDUSTRIAL DEVELOPMENT**

COMMERCIAL/INDUSTRIAL CATEGORY	AVERAGE SQUARE FOOTAGE PER EMPLOYEE	EMPLOYEES PER 1,000 SQUARE FEET
Banks	354	2.8253
Community Shopping Center	652	1.5348
Neighborhood Shopping Center	357	2.7985
Industrial Business Parks	284	3.5156
Industrial Parks/Warehousing/Manufacturing	742	1.3473
Rental Self-Storage	15,541	0.0643
Research & Development	329	3.0408
Hospitality (Lodging)	883	1.1325
Commercial Offices (Standard)	209	4.7897
Commercial Offices (Large High Rise)	220	4.5442
Corporate Offices	372	2.6848
Medical Offices	234	4.2654

Source: San Diego Traffic Generator Study, January 1990 Edition; SANDAG.

## B. RESIDENTIAL IMPACT

### 1. Households

To evaluate the impact of commercial/industrial development on School District facilities, the employee generation estimates listed in Table 10 above were first used to determine the impact of commercial/industrial development on a per household basis. Based on information provided by the U.S. Census Bureau<sup>1</sup>, there are approximately 1.51 employed persons per household on average for households located within the School District. Dividing the employee generation estimates listed in Table 11 by 1.51 results in the estimated number of households per 1,000 square feet of commercial/industrial development (“Total Household Impact”).

The Total Household Impact determined in the preceding paragraph takes into consideration all employees generated from commercial/industrial development. Since some of those employees will live outside the School District and will therefore have no impact on the School District, the figures are adjusted to reflect only those households within the School District occupied by employees generated from commercial/industrial development built within the School District. Based on information derived from U.S. Census Bureau data<sup>2</sup>, it is estimated that approximately 29.9% of employees both live and work within the School District. Multiplying the Total Household Impact by 29.9% results in the households within the School District impacted per 1,000 square feet commercial/industrial development. The results of these computations are shown in Table 11.

**TABLE 11  
IMPACT OF COMMERCIAL/INDUSTRIAL DEVELOPMENT ON  
HOUSEHOLDS WITHIN THE SCHOOL DISTRICT**

<b>COMMERCIAL/INDUSTRIAL CATEGORY</b>	<b>SCHOOL DISTRICT HOUSEHOLDS PER 1,000 SQUARE FEET COM./IND.</b>
Banks	0.5595
Community Shopping Center	0.3039
Neighborhood Shopping Center	0.5541
Industrial Business Parks	0.6961
Industrial Parks/Warehousing/Manufacturing	0.2668
Rental Self-Storage	0.0127
Research & Development	0.6021
Hospitality (Lodging)	0.2243
Commercial Offices (Standard)	0.9484
Commercial Offices (Large High Rise)	0.8998
Corporate Offices	0.5316
Medical Offices	0.8446

<sup>1</sup> 2015-2019 American Community Survey 5-Year Estimates; DP04 – Selected Housing; DP03 – Employment.

<sup>2</sup> 2015-2019 American Community Survey 5-Year Estimates; S0801 – Commuting Characteristics.

## 2. Household Student Generation

The student generation impacts per 1,000 square feet of commercial/industrial development were calculated by multiplying the household impacts shown in Table 11 by blended student generation rates determined for each school level. The result of this calculation is shown in Table 12. The blended student generation rates are based on the SGRs summarized in Table 3 and were combined into a single rate per school level based on the proportionate number of each type of residential unit anticipated to be constructed in the School District as shown in Table 2. The determination of the blended student generation rates is shown and described in Appendix “D” of this Study.

**TABLE 12**  
**STUDENT GENERATION PER 1,000 SQUARE FEET OF**  
**COMMERCIAL/INDUSTRIAL DEVELOPMENT**

COMMERCIAL/INDUSTRIAL CATEGORY	TOTAL STUDENT GENERATION
Banks	0.1086
Community Shopping Center	0.0590
Neighborhood Shopping Center	0.1076
Industrial Business Parks	0.1351
Industrial Parks/Warehousing/Manufacturing	0.0518
Rental Self-Storage	0.0025
Research & Development	0.1169
Hospitality (Lodging)	0.0435
Commercial Offices (Standard)	0.1841
Commercial Offices (Large High Rise)	0.1747
Corporate Offices	0.1032
Medical Offices	0.1639

## 3. Inter-District Student Impact

Based on information provided by the School District, 193 students were enrolled at the School District on an inter-district basis as of October 2021, of which 106 students are enrolled at the elementary school level, 25 students are enrolled at the junior high school level, and 62 students are enrolled at the high school level. Many of those inter-district students attend the School District as a result of their parents or guardians being employed at businesses located within the School District boundaries. To determine the inter-district impact of new commercial/industrial development, the number of inter-district students was first divided by the estimated number of employees within the School District’s area. Employment was estimated at 119,927 based on information obtained from the U.S. Census Bureau. The ratio of inter-district students to estimated employment was then multiplied by the employee generation factors for each of the commercial/industrial categories as shown in Table 10. The calculation results in the Inter-District Student Impacts shown in Table 13.

**TABLE 13  
INTER-DISTRICT COST IMPACT PER 1,000 SQUARE FEET OF  
COMMERCIAL/INDUSTRIAL DEVELOPMENT**

COMMERCIAL/INDUSTRIAL CATEGORY	TOTAL INTER-DISTRICT COST IMPACT
Banks	0.0045
Community Shopping Center	0.0025
Neighborhood Shopping Center	0.0045
Industrial Business Parks	0.0056
Industrial Parks/Warehousing/Manufacturing	0.0022
Rental Self-Storage	0.0001
Research & Development	0.0049
Hospitality (Lodging)	0.0018
Commercial Offices (Standard)	0.0077
Commercial Offices (Large High Rise)	0.0073
Corporate Offices	0.0043
Medical Offices	0.0068

#### 4. Total Student Generation Impact

The Total Student Generation Impact is determined by adding the Student Generation Impacts shown in Table 12 to the Inter-District Impacts determined in Table 13. The Total Student Generation Impacts are listed in Table 14.

**TABLE 14  
TOTAL STUDENT GENERATION IMPACT PER 1,000 SQUARE FEET OF  
COMMERCIAL/INDUSTRIAL DEVELOPMENT**

COMMERCIAL/INDUSTRIAL CATEGORY	TOTAL COST IMPACT
Banks	0.1131
Community Shopping Center	0.0615
Neighborhood Shopping Center	0.1121
Industrial Business Parks	0.1407
Industrial Parks/Warehousing/Manufacturing	0.0540
Rental Self-Storage	0.0026
Research & Development	0.1218
Hospitality (Lodging)	0.0453
Commercial Offices (Standard)	0.1918
Commercial Offices (Large High Rise)	0.1820
Corporate Offices	0.1075
Medical Offices	0.1707

## C. NET IMPACT PER COMMERCIAL/INDUSTRIAL SQUARE FOOT

### 1. Cost Impact

To estimate the school facilities costs required to house new students as a result of additional commercial/industrial development, the total school facilities cost impact per 1,000 square feet of commercial/industrial development was determined by multiplying the average school facilities costs per student determined in Table 6 by the student generation impacts determined in Table 14. The total school facilities cost impacts are shown in Table 15 by commercial/industrial development category.

**TABLE 15**  
**SCHOOL FACILITIES COSTS PER 1,000 SQUARE FEET OF**  
**COMMERCIAL/INDUSTRIAL DEVELOPMENT**

COMMERCIAL/INDUSTRIAL CATEGORY	TOTAL COST IMPACT
Banks	\$4,955
Community Shopping Center	\$2,694
Neighborhood Shopping Center	\$4,911
Industrial Business Parks	\$6,164
Industrial Parks/Warehousing/Manufacturing	\$2,366
Rental Self-Storage	\$114
Research & Development	\$5,336
Hospitality (Lodging)	\$1,985
Commercial Offices (Standard)	\$8,403
Commercial Offices (Large High Rise)	\$7,974
Corporate Offices	\$4,710
Medical Offices	\$7,479

### 2. Residential Fee Offsets

New commercial/industrial development within the School District will generate new employees, thereby increasing the need for new residential development to house those employees living in the School District. Residential school fees adopted by the School District under applicable law will also be imposed by the School District on such new residential development. To prevent new commercial/industrial development from paying the portion of impact that is mitigated by the applicable residential school fees, this amount has been calculated and deducted from the school facilities impact costs calculated in Table 15.

The residential fee offsets are first calculated by using the School District's Level I Fee applicable to residential development (\$4.79 per square foot) and multiplying that amount by the weighted average square footage of a residential unit in the School District, which is 1,044 square feet. This calculation provides the average residential revenues from a residential unit of \$5,001 (\$4.79 x 1,044). The average residential revenues from a residential unit multiplied by Household Impacts per 1,000 square feet of commercial/industrial development, as shown in Table 11, results in the residential

school fee revenues per 1,000 square feet of commercial/industrial development (“Residential Fee Offset”). This computation is shown in Table 16.

**TABLE 16  
RESIDENTIAL FEE OFFSET**

COMMERCIAL/INDUSTRIAL CATEGORY	TOTAL COST IMPACT
Banks	\$2,798
Community Shopping Center	\$1,520
Neighborhood Shopping Center	\$2,771
Industrial Business Parks	\$3,481
Industrial Parks/Warehousing/Manufacturing	\$1,334
Rental Self-Storage	\$64
Research & Development	\$3,011
Hospitality (Lodging)	\$1,122
Commercial Offices (Standard)	\$4,743
Commercial Offices (Large High Rise)	\$4,500
Corporate Offices	\$2,658
Medical Offices	\$4,224

### 3. Net School Facilities Costs

Subtracting the Residential Fee Offset determined in Table 16 from the total school facilities costs listed in Table 15 results in the net school facilities costs per 1,000 square feet of commercial/industrial development (“Net School Facilities Costs”). The Net School Facilities Costs are listed in Table 17.

**TABLE 17  
NET SCHOOL FACILITIES COSTS  
PER 1,000 SQUARE FEET COMMERCIAL/INDUSTRIAL DEVELOPMENT**

COMMERCIAL/INDUSTRIAL CATEGORY	TOTAL SCHOOL FACILITIES COSTS	RESIDENTIAL FEE OFFSET	NET SCHOOL FACILITIES COSTS (PER 1,000 SQUARE FEET COM./IND.)
Banks	\$4,955	\$2,798	\$2,157
Community Shopping Center	\$2,694	\$1,520	\$1,174
Neighborhood Shopping Center	\$4,911	\$2,771	\$2,140
Industrial Business Parks	\$6,164	\$3,481	\$2,683
Industrial Parks/Warehousing/Manufacturing	\$2,366	\$1,334	\$1,032
Rental Self-Storage	\$114	\$64	\$50
Research & Development	\$5,336	\$3,011	\$2,325
Hospitality (Lodging)	\$1,985	\$1,122	\$863
Commercial Offices (Standard)	\$8,403	\$4,743	\$3,660
Commercial Offices (Large High Rise)	\$7,974	\$4,500	\$3,474
Corporate Offices	\$4,710	\$2,658	\$2,052
Medical Offices	\$7,479	\$4,224	\$3,255

The Net School Facilities Costs determined in Table 17 were then divided by 1,000<sup>1</sup> to provide the cost impact on a square foot basis. These cost impacts are listed in Table 18.

**TABLE 18**  
**NET COST IMPACTS**  
**PER SQUARE FOOT OF COMMERCIAL/INDUSTRIAL DEVELOPMENT**

COMMERCIAL/INDUSTRIAL CATEGORY	NET IMPACTS
Banks	<b>\$2.16</b>
Community Shopping Center	<b>\$1.17</b>
Neighborhood Shopping Center	<b>\$2.14</b>
Industrial Business Parks	<b>\$2.68</b>
Industrial Parks/Warehousing/Manufacturing	<b>\$1.03</b>
Rental Self-Storage	<b>\$0.05</b>
Research & Development	<b>\$2.33</b>
Hospitality (Lodging)	<b>\$0.86</b>
Commercial Offices (Standard)	<b>\$3.66</b>
Commercial Offices (Large High Rise)	<b>\$3.47</b>
Corporate Offices	<b>\$2.05</b>
Medical Offices	<b>\$3.25</b>

The net cost impacts shown in Table 18 are greater or equal to the School District’s current maximum authorized commercial/industrial School Fees of \$0.78 per square foot, except for the category of Rental Self-Storage development. Therefore, the School District is justified in levying school fees on commercial/industrial in amount up to but not exceeding the School District’s share of the maximum authorized statutory fee. For Rental Self-Storage businesses, which typically have extremely low numbers of employees, the School District is justified in collecting \$0.05 per square foot.

---

<sup>1</sup> The Employee Generation rates derived from the SANDAG study are estimated per 1,000 square feet of development.



## **SECTION V. OTHER CONSIDERATIONS**

---

### **A. COMMERCIAL/INDUSTRIAL DEVELOPMENT NOT IN PRESCRIBED CATEGORIES**

In cases where new commercial/industrial development does not fit within the prescribed categories shown in Table 15, the School District shall evaluate such development on a case-by-case basis to determine if the imposition of the School Fees on the development meets the nexus requirements set forth under Government Code Section 66000 et seq. The School District may levy School Fees on such development in an amount up to but not exceeding the cost per square foot impact determined through such evaluation.

### **B. AGE-RESTRICTED (SENIOR) HOUSING**

The School 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 School District acknowledges Section 65995.1 and will levy its share of School Fees on qualifying senior citizen housing projects at the current commercial/industrial rate of \$0.78 per square foot as justified herein. The School 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 School Fees being levied on residential development per square foot should such CC&Rs or deed(s) be modified to allow students to reside in 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 School District may wish to seek cooperation from the developer as a condition of levying the commercial/industrial School Fee rate. Such cooperation could take the form of an agreement by the developer to include a restriction in the recorded CC&Rs conditioning subsequent changes in residency requirements on the owner’s payment of applicable developer fees, and to notify the School District of changes in residency requirements and/or to provide current residency data upon School District’s request.

## **SECTION VI. REDEVELOPMENT**

---

Government Code Section 66001, subdivision (a)(3) and (4) requires that a school district, in imposing school-impact fees, establish a reasonable relationship between the fee's use, the need for the public facility and the type of development project on which the fee is imposed. This section addresses and sets forth general policy when considering the levy of school fees on new construction units resulting from redevelopment projects within the School District.

Redevelopment means voluntarily demolishing existing residential, commercial, and/or industrial structures and subsequently replacing them with new construction (“Redevelopment”). The School District is aware of Redevelopment projects completed within the School District boundaries and anticipates similar Redevelopment projects may be completed in the next five (5) years and beyond. School fees authorized pursuant to Education Code Section 17620 and Government Code Sections 65995 et seq. shall be levied by the School District on new construction resulting from Redevelopment projects, if there is a nexus between the School Fees being imposed and the impact of new construction on school facilities, after the impact of pre-existing development has been taken into consideration. In determining such nexus, the School District shall review, evaluate and determine on a case-by-case basis, the additional impact of the proposed new development by comparing the projected square footage, student generation and cost impacts of the proposed new construction and the pre-existing residential, commercial and/or industrial development. In conducting this review and analysis, the School District will take into consideration the type of unit being constructed in comparison with unit type being replaced (e.g., the impact of an existing single family detached home being demolished and replaced with a tri-plex). Such analysis shall utilize the student generation rates identified in Table 3 of this Study, as applicable.

The School District may levy school fees, authorized under applicable law, on new construction resulting from Redevelopment projects in an amount up to the additional impact cost per square foot as determined in accordance with the preceding paragraph, but not exceeding the applicable school fees.

## **SECTION VII. GOVERNMENT CODE SECTION 66000**

---

Government Code Sections 66000 *et seq.* were enacted by State Legislature in 1987. In any action establishing, increasing, or imposing a fee as a condition of approval of a development project, such as the Applicable Residential School Fee and Applicable Commercial/Industrial School Fees described herein (collectively referred to as the “Applicable School Fees”), these Government Code sections require the public agency to satisfy the following requirements:

1. Determine the purpose of the fee;
2. Identify the use to which the fee is to be put;
3. Determine how there is a reasonable relationship between the fee’s use and the type of development project on which the fee is imposed;
4. Determine that there is a reasonable relationship between the need for the public facilities and the type of development project on which the fee is imposed;
5. Determine that there is a reasonable relationship between the amount of the fee and the cost, or portion of the cost of the public facility attributable to the development on which the fee is imposed; and
6. Provide an annual accounting of any portion of the fee remaining unspent or held for projects for more than five (5) years after collection.

The information set forth herein, including the information contained in the Appendices attached hereto, provide factual evidence establishing a nexus between the type of development projected to be built within the School District and the amount of Applicable School Fees levied upon such development based on the need for such Applicable School Fees. The determinations made in this Study meet the requirements of Government Code Section 66000. The findings are summarized as follows:

### **Purpose of the School Fee**

The Board of the School District will levy and collect school fees on new residential and commercial/industrial development to obtain funds for the construction and/or reconstruction of school facilities to accommodate students generated as a result of such development. In accordance with Education Code Section 17620, “construction or reconstruction of school facilities” *does not* include any item of expenditure for any of the following:

1. Regular maintenance or routine repair of school buildings and facilities;
2. Inspection, sampling, analysis, encapsulation or removal of asbestos-containing material, except where incidental to school facilities construction or reconstruction for which the expenditure of fees or other consideration collected pursuant to Education Code Section 17620 is not prohibited; and,
3. Deferred maintenance as described in Education Code Section 17582.

### **Identify the Use of the School Fee**

The School District has determined that revenues collected from Applicable School Fees imposed on residential and commercial/industrial developments will be used for the following purposes:

1. Construction or reconstruction of school facilities required to accommodate students generated by new residential and commercial/industrial development in areas of the School District where existing school facilities are needed;
2. Construction or reconstruction of administrative and operations facilities required in response to new student growth from new development;
3. Acquisition or lease of property for unhoused students generated from new development, including the repayment of debt issued for the acquisition of such property;
4. Purchase or lease of interim and/or temporary school facilities in order to accommodate student capacity demands;
5. Costs associated with the administration, collection, and justification for the Applicable School Fees;
6. Provide local funding that may be required if the School District applies for State funding through SB 50.

### **Relationship Between the Use of the Fee, the Need for School Facilities and the Type of Development on Which the Fee is Imposed**

As determined in the preceding sections, existing school facilities are in need of upgrade or replacement so that they can remain available for the students from new residential and commercial/industrial development, and to provide adequate and safe housing for students generated from such new development. The fees imposed on such new development will be used, in part, to finance a portion of the construction and/or reconstruction of school facilities required to accommodate student enrollment growth generated by new residential and commercial/industrial development, and to allow the District to maintain existing levels of service for students generated by that development.

### **Determination of the Relationship Between the Fee Amount and the School Facilities Costs Attributable to Type of Development on Which the Fee is Imposed**

The imposition of the Applicable Residential School Fee of \$4.79 per square foot of residential development is justified, as this fee is below the per square foot cost impact to provide adequate school facilities required as a result of such new residential development.

Similarly, the imposition of the Applicable Commercial/Industrial School Fees of \$0.78 per square foot of commercial/industrial development are justified as the fees are equal to or below the estimated per square foot net cost impact to provide adequate school facilities required as a result of such new commercial/industrial development, except for Rental Self-Storage development.

### **Accounting Procedures for the Fees**

The School District will deposit, invest, and expend the school fees imposed and collected on residential and commercial/industrial development in accordance with the provision of Government Code Section 66006.

In accordance with Government Code Sections 66001 and 66006, the School District provides, on an annual basis, an Annual & Five-Year Report, which reports the collection and expenditures of School Fees, and identification of sources and amounts of funding anticipated, inclusive of revenues from School Fees, to complete financing of incomplete facilities projects. In addition to the incomplete facilities projects shown in the most recent report, the School District anticipates additional facilities projects for which revenues from School Fees will be used in full, or in part, to finance such projects.

**APPENDIX A**  
**COMMERCIAL/INDUSTRIAL DEVELOPMENT DESCRIPTIONS**

---

Banks	Include small branch offices to regional offices used for banking. Properties under this category allow customers to conduct banking on-site.
Shopping Center	Broadly include regional, community and neighborhood shopping centers which sell merchandise and services to consumers. Include grocery stores, restaurants, retail centers, automotive sales.
Industrial Business Parks	Include any combination of facilities engaged in manufacturing/assembly, warehousing, and/or storage with 15% or more of the total area designated for commercial use.
Industrial Parks/Warehousing/ Manufacturing	Include any combination of facilities engaged in manufacturing/assembly, warehousing, and/or storage with limited or no commercial use (less than 15% of the total area designated for commercial use).
Rental Self-Storage	Include warehouse developments which rent small storage vaults and often termed “mini-storage”.
Research & Development	Include scientific research and development laboratories, office and/or their supporting facilities.
Hospitality (Lodging)	Include establishments which provide lodging to the general public. Lodging types include hotels, motels, resort hotels and inns. The maximum term of occupancy for establishment within this category shall not exceed 30 days.
Commercial Offices (Standard) <sup>1</sup>	Include general office space occupying less than 100,000 square feet with multiple tenants.
Commercial Offices (Large High Rise) <sup>1</sup>	Include general office space occupying 100,000 square feet and greater with multiple tenants.
Corporate Offices	An office or office building with a single tenant.
Medical Offices	Include medical offices that serve a wide range of medical needs and may include a pharmacy. Medical offices are generally operated by one or more physicians.

<sup>1</sup> Office space used for activities described under banks, research and development, or medical offices should be classified under those categories.

**APPENDIX B**  
**FACILITIES CAPACITY UPDATE**

---

**FREMONT UNIFIED SCHOOL DISTRICT  
FACILITIES CAPACITY UPDATE  
APPENDIX B**

**CLASSROOM INVENTORY**

School Level	School Site	Permanent Classrooms	Portable Classrooms	Total Classrooms	Special Education Permanent Classrooms	Special Education Portable Classrooms	General Education Classrooms
Elementary School	Ardenwood Elementary School	1	37	38	-	-	38
	Brier Elementary School	18	12	30	-	-	30
	Brookvale Elementary School	29	4	33	-	-	33
	Cabrillo Elementary School	17	6	23	3	1	19
	E.M. Grimmer Elementary School	26	4	30	3	1	26
	Forest Park Elementary School	25	12	37	-	-	37
	Fred E. Weibel Elementary School	1	34	35	-	1	34
	Glenmoor Elementary School	22	9	31	2	-	29
	Harvey Green Elementary School	17	4	21	-	2	19
	J. Haley Durham Elementary School	20	14	34	-	-	34
	James Leitch Elementary School	15	20	35	3	1	31
	John Blacow Elementary School	32	2	34	4	-	30
	John G. Mattos Elementary School	21	9	30	4	2	24
	John Gomes Elementary School	21	13	34	3	-	31
	Joseph Azevada Elementary School	23	9	32	3	-	29
	Joshua Chadbourne Elementary School	22	10	32	3	-	29
	Lila Bringhurst Elementary <sup>1</sup>	52	-	52	3	-	49
	Mission San Jose Elementary School	16	12	28	1	1	26
	Mission Valley Elementary School	21	12	33	1	3	29
	Niles Elementary School	13	9	22	-	-	22
	O.N. Hirsch Elementary School	14	9	23	1	1	21
	Oliveira Elementary School	15	22	37	-	3	34
	Parkmont Elementary School	22	10	32	-	-	32
	Patterson Elementary School	13	22	35	2	-	33
	Steven Millard Elementary School	24	6	30	4	-	26
	Tom Maloney Elementary School	19	6	25	2	-	23
Vallejo Mill Elementary School	20	4	24	-	1	23	
Warm Springs Elementary School	30	18	48	-	-	48	
Warwick Elementary School	22	17	39	2	2	35	
<b>ELEMENTARY SCHOOL (TK-6) TOTALS</b>		<b>591</b>	<b>346</b>	<b>937</b>	<b>44</b>	<b>19</b>	<b>874</b>
Junior High	Centerville Junior High School	25	19	44	2	3	39
	G.M. Walters Middle School	54	-	54	7	-	47
	John M. Horner Middle School	35	8	43	1	-	42
	Thornton Junior High School	22	25	47	3	1	43
	William Hopkins Junior High School	33	7	40	3	-	37
<b>JUNIOR HIGH SCHOOL (7-8) TOTALS</b>		<b>169</b>	<b>59</b>	<b>228</b>	<b>16</b>	<b>4</b>	<b>208</b>
High School	American High School	67	31	98	2	-	96
	Irvington High School	84	16	100	6	-	94
	John F. Kennedy High School	56	10	66	3	1	62
	Mission San Jose High School	59	23	82	2	4	76
	Robertson Continuation High School	21	1	22	-	-	22
	Washington High School	81	4	85	6	-	79
<b>HIGH SCHOOL (9-12) TOTALS</b>		<b>368</b>	<b>85</b>	<b>453</b>	<b>19</b>	<b>5</b>	<b>429</b>
<b>Total</b>		<b>1,128</b>	<b>490</b>	<b>1,618</b>	<b>79</b>	<b>28</b>	<b>1,511</b>

<sup>1</sup> Lila Bringhurst Elementary was not open for enrollment for the 2021-2022 school year.



**FREMONT UNIFIED SCHOOL DISTRICT  
FACILITIES CAPACITY UPDATE  
APPENDIX B**

**CLASSROOM INVENTORY**

Description	General Education			Non Severe	Severe	Total
	TK-6	7-8	9-12			
1. Leased State Relocatable Classrooms	-	-	-	-	-	-
2. Portable Classrooms Leased less than 5 years	-	-	-	-	-	-
3. Interim Housing Portables Leased less than 5 years	29	17	24	2	-	72
4. Interim Housing Portables Leased at least 5 years	-	-	-	-	-	-
5. Portable Classrooms Leased at least 5 years	-	-	-	-	-	-
6. Portable Classrooms Owned by District	298	38	56	26	-	418
7. Permanent Classrooms	547	153	349	79	-	1,128
<b>Total (Lines 1 through 7)</b>	<b>874</b>	<b>208</b>	<b>429</b>	<b>107</b>	<b>-</b>	<b>1,618</b>

**DETERMINATION OF EXISTING BUILDING CAPACITY**

Description	General Education			Non Severe	Severe	Total
	TK-6	7-8	9-12			
I. Total Classroom Inventory	874	208	429	107	-	1,618
II. Permanent Classrooms						1,128
III. Portable Classrooms						418
IV. 25% of Permanent Classrooms						282
V. Adjustment (III. Minus IV.)	97	12	18	8	-	136
IV. Total (I. minus V.)	777	196	411	99	-	1,483
<b>Building Capacity<sup>1</sup></b>	<b>19,425</b>	<b>5,292</b>	<b>11,097</b>	<b>1,287</b>	<b>-</b>	<b>37,101</b>

<sup>1</sup> School capacities are determined based on loading factors of 25 pupils per classroom for grades K through 6, 27 pupils per classroom for grades 7 through 12, 9 pupils per classroom for those classified as severe, and 13 pupils per classroom for those classified as non-severe, as set forth in the California Code of Regulation, Title II, Section 1859.35.

**BUILDING CAPACITY BY SCHOOL LEVELS**

Description	TK-6	7-8	9-12	Total
General Education	19,425	5,292	11,097	35,814
Proration of Non-Severe Capacity	698	190	399	1,287
Proration of Severe Capacity	-	-	-	-
<b>Building Capacity</b>	<b>20,123</b>	<b>5,482</b>	<b>11,496</b>	<b>37,101</b>

**APPENDIX C**  
**ENROLLMENT SUMMARY**

---

**FREMONT UNIFIED SCHOOL DISTRICT  
2021/22 ENROLLMENT SUMMARY  
APPENDIX C**

School Name/Program	Elementary					Junior High			High				Grand Total	
	TK/K	1	2	3	4	5	6	7	8	9	10	11		12
American High School	-	-	-	-	-	-	-	-	-	658	602	642	620	2,522
Ardenwood Elementary School	90	109	89	115	109	127	102	-	-	-	-	-	-	741
Brier Elementary School	123	96	79	96	101	92	-	-	-	-	-	-	-	587
Brookvale Elementary School	95	68	72	65	69	68	73	-	-	-	-	-	-	510
Cabrillo Elementary School	45	47	47	42	49	54	47	-	-	-	-	-	-	331
Centerville Junior High School	-	-	-	-	-	-	-	451	474	-	-	-	-	925
Circle of Independent Learning	12	11	21	11	18	25	24	32	33	41	60	58	56	402
College Connection Program	-	-	-	-	-	-	-	-	-	-	-	-	31	31
E.M. Grimmer Elementary School	47	59	61	66	57	79	15	-	-	-	-	-	-	384
Forest Park Elementary School	120	125	133	136	135	136	120	-	-	-	-	-	-	905
Fred E. Weibel Elementary School	245	262	274	86	112	103	-	-	-	-	-	-	-	1,082
G.M. Walters Middle School	-	-	-	-	-	-	365	343	370	-	-	-	-	1,078
Glenmoor Elementary School	91	76	90	91	109	88	88	-	-	-	-	-	-	633
Harvey Green Elementary School	72	56	58	70	89	64	-	-	-	-	-	-	-	409
Irvington High School	-	-	-	-	-	-	-	-	-	571	592	586	566	2,315
J. Haley Durham Elementary School	135	112	109	88	97	70	-	-	-	-	-	-	-	611
James Leitch Elementary School	235	215	210	-	-	-	-	-	-	-	-	-	-	660
John Blacow Elementary School	135	94	66	61	59	57	17	-	-	-	-	-	-	489
John F. Kennedy High School	-	-	-	-	-	-	-	-	-	312	327	348	327	1,314
John G. Mattos Elementary School	52	73	72	51	64	58	-	-	-	-	-	-	-	370
John Gomes Elementary School	116	69	79	79	90	92	99	-	-	-	-	-	-	624
John M. Horner Middle School	-	-	-	-	-	-	503	515	509	-	-	-	-	1,527
Joseph Azevada Elementary School	103	108	97	107	100	94	42	-	-	-	-	-	-	651
Joshua Chadbourne Elementary School	55	74	67	84	107	93	94	-	-	-	-	-	-	574
Mission San Jose Elementary School	53	60	69	74	68	72	78	-	-	-	-	-	-	474
Mission San Jose High School	-	-	-	-	-	-	-	-	-	443	491	487	550	1,971
Mission Valley Elementary School	44	69	44	85	89	73	83	-	-	-	-	-	-	487
Niles Elementary School	90	78	80	84	98	72	73	-	-	-	-	-	-	575
Non-Public School Placement (NPS)	5	-	1	1	2	5	4	4	6	5	4	2	14	53
O.N. Hirsch Elementary School	48	57	81	84	82	87	2	-	-	-	-	-	-	441
Oliveira Elementary School	61	82	98	99	83	111	87	-	-	-	-	-	-	621
Parkmont Elementary School	140	128	134	125	119	119	111	-	-	-	-	-	-	876
Patterson Elementary School	114	89	93	104	80	81	108	-	-	-	-	-	-	669
Robertson Continuation High School	-	-	-	-	-	-	-	-	-	3	48	104	-	155
Steven Millard Elementary School	77	77	84	86	82	75	-	-	-	-	-	-	-	481
Thornton Junior High School	-	-	-	-	-	-	-	689	613	-	-	-	-	1,302
Tom Maloney Elementary School	84	79	68	87	72	64	73	-	-	-	-	-	-	527
Vallejo Mill Elementary School	81	75	61	68	59	61	69	-	-	-	-	-	-	474
Vista Alternative School	-	-	-	-	-	-	-	33	25	18	16	27	32	151
Warm Springs Elementary School	-	-	-	409	369	361	134	-	-	-	-	-	-	1,273
Warwick Elementary School	109	93	120	124	111	119	113	-	-	-	-	-	-	789
Washington High School	-	-	-	-	-	-	-	-	-	509	453	497	480	1,939
William Hopkins Junior High School	-	-	-	-	-	-	-	464	476	-	-	-	-	940
<b>GRAND TOTAL</b>	<b>2,677</b>	<b>2,541</b>	<b>2,557</b>	<b>2,678</b>	<b>2,679</b>	<b>2,600</b>	<b>2,524</b>	<b>2,531</b>	<b>2,506</b>	<b>2,560</b>	<b>2,593</b>	<b>2,751</b>	<b>2,676</b>	<b>33,873</b>
<b>GRAND TOTAL</b>	<b>2,677</b>	<b>2,541</b>	<b>2,557</b>	<b>2,678</b>	<b>2,679</b>	<b>2,600</b>	<b>2,524</b>	<b>2,531</b>	<b>2,506</b>	<b>2,560</b>	<b>2,593</b>	<b>2,751</b>	<b>2,676</b>	<b>33,873</b>
<b>TOTAL BY SCHOOL LEVEL</b>							<b>18,256</b>		<b>5,037</b>				<b>10,580</b>	<b>33,873</b>

Source: School District

## APPENDIX D

### STUDENT GENERATION RATES

---

Student Generation Rates (SGRs) used in this Study are based on information obtained from the County of Alameda Assessor’s Office (the “County”), and student enrollment data from the School District.

In order to calculate student generation rates (“SGRs”), K&G Public Finance first obtained (i) property characteristic/GIS data and residential building permits data from Alameda County as of December 2021 and (ii) building permit data from the City as of December 31, 2021. The property database contains property information for parcels within the School District, including land use class information (i.e. condominiums, single family dwellings, etc.). Parcels in the database were classified by unit type (SFD, SFA, MF) based on the County’s land use class designations, and further research as necessary.

A student enrollment database was obtained from the School District and was reflective of student enrollment information as of October 2021. The student enrollment address information was matched to the address (situs address) information of parcels in the County’s property characteristic database. The number of students matched was then queried by school level and residential category. Students could not be matched if they were inter-district or they did not have a valid physical address (e.g. only P.O. Box was listed). Mobile homes are not considered in the SGR determination, including the students matched to the mobile home land use, and therefore have been omitted<sup>6</sup>. The determination of the SGRs is summarized in Tables D-1 through D-3.

**Table D-1**  
**Single Family Detached (SFD)**  
**Student Generation Rates**

SCHOOL LEVEL	STUDENTS MATCHED	SFD UNITS	SGR BY SCHOOL LEVEL
Elementary School (TK-6)	268	729	0.3676
Junior High (7-8)	68	729	0.0933
High School (9-12)	156	729	0.2140
<b>TOTAL</b>	<b>492</b>	<b>NA</b>	<b>0.6749</b>

**Table D-2**  
**Single Family Attached (SFA)**  
**Student Generation Rates**

SCHOOL LEVEL	STUDENTS MATCHED	SFA UNITS	SGR BY SCHOOL LEVEL
Elementary School (TK-6)	223	1,431	0.1558
Junior High (7-8)	36	1,431	0.0252
High School (9-12)	55	1,431	0.0384
<b>TOTAL</b>	<b>314</b>	<b>NA</b>	<b>0.2194</b>

<sup>6</sup> Education Code Section 17625 sets forth the prerequisites that must be met before school districts may levy school fees on mobile homes. Since it is often difficult to determine and make projections relating to mobile homes that meet those requirements, the mobile home category is omitted from this analysis.

**Table D-3  
Multi-Family (MF)  
Student Generation Rates**

SCHOOL LEVEL	STUDENTS MATCHED	MF UNITS	SGR BY SCHOOL LEVEL
Elementary School (TK-6)	166	1,213	0.1369
Junior High (7-8)	26	1,213	0.0214
High School (9-12)	32	1,213	0.0264
<b>TOTAL</b>	<b>224</b>	<b>NA</b>	<b>0.1847</b>

In order to evaluate students generated from future households by school level, the student generation rates determined in Tables D-1 through D-3 above (also summarized in Table 3 of this Study) were used. These student generation rates are listed by residential category and by school level.

**Table D-4  
Student Generation Rates**

SCHOOL LEVEL	SFD UNITS	SFA UNITS	MF UNITS
Elementary School (TK-6)	0.3676	0.1558	0.1369
Junior High (7-8)	0.0933	0.0252	0.0214
High School (9-12)	0.2140	0.0384	0.0264
<b>TOTAL</b>	<b>0.6749</b>	<b>0.2194</b>	<b>0.1847</b>

The student generation rates for each residential category listed in Table D-4 were blended into a single student generation rate for each school level based on the percentage allocation of unmitigated Projected Units. The percentage allocations are shown in Table D-5.

**Table D-5  
Allocation of Projected Units by Residential Category**

RESIDENTIAL CATEGORY	PROJECTED UNITS	PERCENTAGE ALLOCATION
SFD	35	1.1%
SFA	374	11.7%
MF	2,793	87.2%
<b>TOTAL</b>	<b>3,202</b>	<b>100.0%</b>

The Blended Student Generation Rates were determined by applying the percentage allocations, the results of which are shown in Table D-6.

**Table D-6  
Blended Student Generation Rates**

SCHOOL LEVEL	BLENDED STUDENT GENERATION RATE <sup>1</sup>
Elementary School (TK-6)	0.1416
Junior High (7-8)	0.0226
High School (9-12)	0.0299
<b>TOTAL</b>	<b>0.1941</b>

<sup>1</sup> May not compute due to slight rounding differences.