



Level I Developer Fee Study
for
Jefferson Union High
School District

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TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
SCHOOL DISTRICT BACKGROUND.....	3
INTRODUCTION	4
SECTION I: DEVELOPER FEE JUSTIFICATION	7
Reconstruction/Modernization	7
Reconstruction/Modernization Need.....	8
Residential Development and Fee Projections	12
Impact of Other Residential Development.....	14
Commercial / Industrial Development and Fee Projections.....	14
Summary	17
SECTION II: BACKGROUND OF DEVELOPER FEE LEGISLATION.....	17
SECTION III: REQUIREMENTS OF AB 1600.....	20
SECTION IV: REVENUE SOURCES FOR FUNDING FACILITIES.....	23
State Sources	23
Local Sources	24
SECTION V: ESTABLISHING THE COST, BENEFIT AND BURDEN NEXUS.....	25
SECTION VI: FACILITY FUNDING ALTERNATIVES.....	26
STATEMENT TO IDENTIFY PURPOSE OF FEE.....	27
ESTABLISHMENT OF A SPECIAL ACCOUNT.....	27
RECOMMENDATION.....	27
SOURCES.....	28
APPENDIX A: PER PUPIL CONSTRUCTION COST	APP 1
APPENDIX B: PER PUPIL GRANT AMOUNTS	APP 2
APPENDIX C: DEVELOPMENT SUMMARY	APP 3
APPENDIX D: COMMERCIAL/INDUSTRIAL CALCULATIONS	APP 4

LIST OF TABLES

	<u>Page</u>
Table 1: Housing Projection Summary	9
Table 2: Construction Costs.....	10
Table 3: Projected Students from Proposed Development	11
Table 4: 20 Year Reconstruction/Modernization Need.....	11
Table 5: Summary of Projected Residential Square Footage	13
Table 6: Facilities Cost per SF from Proposed Residential Construction.....	14
Table 7: Commercial and Industrial Generation Factors	16
Table 8: Commercial and Industrial Facilities Cost Impact.....	16

EXECUTIVE SUMMARY

- Education Code Section 17620 authorizes school districts to levy a fee, charge, dedication or other form of requirement against any development project for the construction or reconstruction/modernization of school facilities provided the District can show justification for levying of fees.
- In January 2020, the State Allocation Board increased the amount of Level I developer fees that school districts are authorized to collect to \$4.08 per square foot for residential construction and \$0.66 per square foot for commercial/industrial construction.
- The Jefferson Union High School District shares developer fees with its elementary feeder districts. The High School District receives 40 percent of the Level I Fee and the feeder districts receive 60 percent of the Level I Fee.
- The Jefferson Union High School District is justified in collecting \$1.63 (40 percent of \$4.08) per square foot for residential construction and \$0.26 (40 percent of \$0.66) per square foot of commercial/industrial construction, with the exception of mini storage and agriculture construction. The mini storage category of construction should be collected at a rate of \$0.01 per square foot and agriculture should be collected at \$0.14 per square foot.
- In general, when possible, it is fiscally more prudent to extend the useful life of an existing facility than to construct new facilities. The cost to reconstruct/modernize facilities is approximately 42.2 percent of the cost to construct new facilities.
- The residential justification is based on the Jefferson Union High School District's projected reconstruction/modernization need of \$14,764,288 for students generated from residential development over the next 20 years and the projected residential square footage of 8,204,985 over the same period.
- Based on the reconstruction/modernization need for students generated from projected residential development and the projected residential square footage,

each square foot of residential construction will create a school facilities cost of \$1.80 (\$14,764,288/8,204,985).

- Each square foot of commercial/industrial construction will create a school facilities cost ranging from \$0.01 to \$0.96 per square foot of new commercial/industrial construction.
- For both residential and commercial/industrial development, the fees authorized by Government Code section 65995 are justified.

SCHOOL DISTRICT BACKGROUND

The Jefferson Union High School District serves approximately 4,300 students in ninth through twelfth grade at three comprehensive high schools, an alternative high school, and a continuation high school. The largest percentage of students identify as Hispanic or Latino (approximately 31.4%), followed by Filipino (~ 30.9%), then White (~ 14.3%), and Asian (~ 13.6%), with a small portion of other ethnic groups. Approximately 32% of students meet the criteria for socioeconomically disadvantaged and approximately 14% of students are considered English Learners. In addition to providing comprehensive, standards-aligned programs, the District provides specialized programs including, Career and Technical Education with 12 pathways, Therapeutic Day School, Adult Transition Program, and Adult Education. The Jefferson Union High School District's vision is "JUHSD is a premier learning community where all students advance to and through post-secondary learning and careers."

The Jefferson Union High School District serves students located on the peninsula of the Bay Area region of California, just south of San Francisco in the cities of Pacifica, Brisbane, Daly City, Colma, South San Francisco, San Bruno, and a portion of unincorporated San Mateo County, including the community of Broadmoor, located on the peninsula of the Bay Area region of California, just south of San Francisco. The coastal City of Pacifica functions primarily as a bedroom community, with nearly half of its land use preserved as open space. Daly City is the largest city by population in San Mateo County and is primarily a residential community, with approximately 56% of land use dedicated as residential. The City of Brisbane has a more diverse land use, primarily composed of a balance of commercial and residential land use, followed by open space and mixed use. The Town of Colma, which is the smallest city in San Mateo County, is known as the "City of Souls" because the Town's landscape is dominated by cemeteries, followed by commercial and mixed-use areas, with a small residential area. According to the San Mateo County Economic Forecast, as of 2018, employment was greatest in professional & business services, healthcare & education, and wholesale & retail trade. The largest employment sub-sectors within professional and business services include, scientific research, custom IT services, and staffing agencies. It is projected that the greatest job growth, through 2024, will occur in the professional & business services, information, healthcare & education, and transportation & warehousing sectors.

INTRODUCTION

State law gives school districts the authority to charge fees on new residential and commercial/industrial developments if those developments generate additional students and cause a need for additional or reconstructed school facilities. The Jefferson Union High School District 2020 Developer Fee Study (hereinafter referred to as "Study" or "Report") analyzes the cost of providing school facilities for students generated by future residential and commercial/industrial development projects in the District. Jack Schreder & Associates, Inc. has been retained by the District to conduct the analysis and prepare this Report.

In September, 1986, the Governor signed into law Assembly Bill 2926 (Chapter 887/Statutes 1986) which granted school district governing boards the authority to impose developer fees on new residential and commercial construction within their respective boundaries. This authority is codified in Education Code Section 17620 which states in part "...The governing board of any school district is authorized to levy a fee, charge, dedication or other form of requirement against any development project for the construction or reconstruction/modernization of school facilities." These fees can be collected without special city or county approval, to fund the construction of school facilities to accommodate students generated from new development projects.

The Level I fee that can be levied is adjusted every two years according to the inflation rate, as listed by the state-wide index for Class B construction set by the State Allocation Board. In January of 1992, the State Allocation Board increased the Level I fee to \$1.65 per square foot for residential construction and \$0.27 per square foot for commercial and industrial construction.

Senate Bill 1287 (Chapter 1354/Statutes of 1992) effective January 1, 1993, affected the facility mitigation requirements a school district could impose on developers. Senate Bill 1287 allowed school districts to levy an additional \$1.00 per square foot of residential construction (Government Code Section 65995.3). The authority to levy the additional \$1.00 was rescinded by the failure of Proposition 170 on the November 1993 ballot.

In January 1994, the State Allocation Board's biennial inflation adjustment changed the fee to \$1.72 per square foot for residential construction and \$0.28 per square foot for commercial/industrial construction.

In January 1996, the State Allocation Board's biennial inflation adjustment changed the fee to \$1.84 per square foot for residential construction and \$0.30 per square foot for commercial/industrial construction.

In January 1998, the State Allocation Board's biennial inflation adjustment changed the fee to \$1.93 per square foot for residential construction and \$0.31 per square foot for commercial/industrial construction.

In January 2000, the State Allocation Board's biennial inflation adjustment changed the fee to \$2.05 per square foot for residential construction and \$0.33 per square foot for commercial/industrial construction.

In January 2002, the State Allocation Board's biennial inflation adjustment changed the fee to \$2.14 per square foot for residential construction and \$0.36 per square foot for commercial/industrial construction.

In January 2004, the State Allocation Board's biennial inflation adjustment changed the fee to \$2.24 per square foot for residential construction and \$0.41 per square foot for commercial/industrial construction.

In January 2006, the State Allocation Board's biennial inflation adjustment changed the fee to \$2.63 per square foot for residential construction and \$0.42 per square foot for commercial/industrial construction.

In January 2008, the State Allocation Board's biennial inflation adjustment changed the fee to \$2.97 per square foot for residential construction and \$0.47 per square foot for commercial/industrial construction.

In January 2010, the State Allocation Board's biennial inflation adjustment maintained the fee at \$2.97 per square foot for residential construction and \$0.47 per square foot for commercial/industrial construction.

In January 2012, the State Allocation Board's biennial inflation adjustment changed the fee to \$3.20 per square foot for residential construction and \$0.51 per square foot for commercial/industrial construction.

In January 2014, the State Allocation Board's biennial inflation adjustment changed the fee to \$3.36 per square foot for residential construction and \$0.54 per square foot for commercial/industrial construction.

In February 2016, the State Allocation Board's biennial inflation adjustment changed the fee to \$3.48 per square foot for residential construction and \$0.56 per square foot for commercial/industrial construction.

In January 2018, the State Allocation Board's biennial inflation adjustment changed the fee to \$3.79 per square foot for residential construction and \$0.61 per square foot for commercial/industrial construction.

In January 2020, the State Allocation Board's biennial inflation adjustment changed the fee to \$4.08 per square foot for residential construction and \$0.66 per square foot for commercial/industrial construction.

The next adjustment to the fee will occur at the January 2022 State Allocation Board meeting.

In order to levy a fee, a school district must demonstrate and document that the fee to be paid bears a reasonable relationship with the need for new or reconstructed facilities caused by new residential and commercial/industrial development. Fees are different from taxes and do not require a vote of the electorate. Fees may be used only for specific purposes and there must be a reasonable relationship between the levying of fees and the impact created by development.

In accordance with the decision in the *Cresta Bella LP v. Poway Unified School District*, 218 Cal. App.4th 438(2013) court case, school districts are required to demonstrate that reconstruction projects will generate an increase in the student population thereby creating an impact on the school district's facilities. School districts

must establish a reasonable relationship between an increase in student facilities needs and the construction project in order to levy developer fees.

Purpose of Study

This study will demonstrate the relationship between residential, commercial and industrial growth and the need for the reconstruction/modernization of existing school facilities in the Jefferson Union High School District.

SECTION I: DEVELOPER FEE JUSTIFICATION

California developer fee law requires that before fees can be levied, a school district must find that justification exists for the fee. Government Code Section 66001 (g) states that a fee shall not include the costs attributable to existing deficiencies in public facilities, but may include the costs attributable to the increased demand for public facilities reasonably related to the development project in order to refurbish existing facilities to maintain the existing level of service or achieve an adopted level of service that is consistent with a general plan. This section of the study will show that justification does exist for levying developer fees in the Jefferson Union High School District.

Reconstruction/Modernization

Extending the useful life of a school is a cost effective and prudent way to house students generated from future development. The State of California recognizes the need to extend the life of existing schools and provides reconstruction/modernization funding through the State School Facility Program. For the purpose of this report, modernization and reconstruction are used interchangeably since many of the improvements are common to both programs, i.e. roofing, plumbing, heating, cooling, dry rot repair, infrastructure improvement, etc. Developer fees may not be used for regular maintenance, routine repair of school buildings and facilities or deferred maintenance. The authorization to justify reconstruction/modernization of school facilities and extend the useful life of existing schools is contained in Education Code Section 17620 and Government Code Section 66001 (g). School districts are permitted to

modernize or reconstruct existing, or build new, school facilities with developer fees as justified by this Study.

Reconstruction/Modernization Need

The State School Facility Program establishes that buildings older than twenty-five years (permanent buildings) and 20 years (portable buildings) are eligible for reconstruction/modernization funds. The State School Facility Program thus recognizes that school buildings require reconstruction/modernization after the initial twenty to twenty-five years of life for those buildings and that facilities which are older than twenty to twenty-five years old are no longer able to provide the existing level of service to students. In some cases, these older buildings may need to be closed entirely for the health and safety of students, teachers, staff and other occupants. Aging infrastructure and building problems can profoundly impact a school's ability to safely remain in service and to continue delivering the instructional program to students at existing levels of service. Therefore, the District's reconstruction/modernization needs are considered over a 20 year period, and a 20 year projection has been included in the Study when considering the homes that will generate students for the facilities in question. Developer fees generated from future development may be used to construct or reconstruct facilities to house students from planned future development. Developer fees generated from future development may be used to reconstruct or construct facilities to house students from planned future development.

As new students are generated by new development, the need to increase the useful life of school facilities will be necessary. In order to calculate the District's estimated reconstruction/modernization need generated by students from new development, it is necessary to determine the following factors: the number of units included in proposed developments, the District student yield factor, and the per pupil cost to modernize facilities.

Potential Residential Development

The Jefferson Union High School District is located within the San Mateo County, City of Daly City, City of Brisbane, City of Colma, San Bruno, City of South San Francisco, and City of Pacifica planning jurisdictions. All planning departments were contacted regarding projected development. According to the City of San Bruno,

development is not projected in the small area of the District’s boundary located in that jurisdiction. According to the other planning jurisdictions, a total of 6,687 residential units may be constructed within District boundaries in the next 20 years. A summary of the projected units by housing type is included in Table 1. Appendix C includes a development summary.

Table 1:
Housing Projection Summary

Housing Type	Housing Units
Multi-Family	3,018
Single-Family	2,160
Accessory Dwelling Units	1,509
Total	6,687

Source: San Mateo County, Daly City, Brisbane, Colma, South San Francisco, Pacifica.

Student Generation Rate

In determining the impact of new development, the District is required to show how many students will be generated from the new development. In order to ensure that new development is paying only for the impact of those students that are being generated by new homes and businesses, the student generation rate is applied to the number of new housing units to determine development-related impacts. The student generation rate identifies the number of students per housing unit and provides a link between new residential construction projects and projections of enrollment.

To identify the number of students anticipated to be generated by new residential development, the student yield factors of .111 for multi-family units and .053 for single-family units have been utilized for Jefferson Union High School District. The rates are based on student generation rates calculated by Jack Schreder and Associates in June of 2020. Residential units constructed in the previous five years were compared to the District address list to determine the student generation rate for multi-family and single-family housing units.

Construction Cost

The estimated construction cost per grade 9-12 pupil is \$56,796. Construction costs are based on research by Jack Schreder & Associates and the California Department of Education. Table 2 shows the estimated cost to construct facilities per grade 9-12 pupil and is included as Appendix A.

Table 2:
Construction Costs

Grade Level	Construction Costs
9-12	\$56,796

Source: California Department of Education, Jack Schreder & Associates.

Reconstruction/Modernization Cost

The cost to modernize facilities is 42.2 percent of new construction costs. The percentage is based on the comparison of the State per pupil reconstruction/modernization grant (including 3% for Americans with Disabilities and Fire, Life Safety improvements) and the State per pupil new construction grant. For example, the State provides \$16,756 per grade 9-12 pupil to construct new facilities and \$6,565 to modernize facilities, which is 39.2 percent ($\$6,565 / \$16,756$) of the new construction grant amount. In addition, the State provides a minimum of three percent for ADA/FLS improvements which are required by the Department of State Architect's (DSA) office. Based on the per pupil grant amounts and the ADA/FLS costs, the estimated cost to modernize facilities is 42.2 percent of the cost to construct facilities. The School Facility Program per pupil grant amounts are included in Appendix B.

The construction cost to construct new facilities per grade 9-12 pupil is estimated at \$56,796 and is outlined in Table 2. Therefore, the per pupil cost to modernize facilities per grade 9-12 pupil is \$23,968 ($\$56,796 \times .422$).

20 Year Reconstruction/Modernization Need

Based on student generation rates by housing type and the projected number of residential units, 616 grade 9-12 new students are projected from proposed new development. The calculation is included in Table 3.

Table 3:
Projected Students from Proposed Development

Housing Type	Projected Units	Student Generation Rate	Projected Students
Multi-Family	3,018	.111	335
Single-Family	2,160	.053	114
Accessory Dwelling Unit	<u>1,509</u>	<u>.111</u>	<u>167</u>
Total	6,687		616

Source: Daly City, Brisbane, Colma, South San Francisco, Pacifica, San Mateo County, Jack Schreder & Associates.

The District’s estimated reconstruction/modernization need generated by students from new residential development is \$14,764,288. The calculation is included in Table 4.

Table 4:
20 Year Reconstruction/Modernization Need

Per Pupil Reconstruction/Modernization Cost	\$23,968
Students Generated	<u>x 616</u>
Reconstruction/modernization Need	\$14,764,288

Source: Jefferson Union High School District, Office of Public School Construction, Jack Schreder & Associates, Daly City, Brisbane, Colma, South San Francisco, Pacifica, San Mateo County.

Residential Development and Fee Projections

To show a reasonable relationship exists between the construction of new residential units and the need for modernized school facilities, it will be shown that residential construction will create a school facility cost impact on the Jefferson Union High School District by students generated from the new residential development.

The Jefferson Union High School District is located within the San Mateo County, City of San Bruno, City of Daly City, City of Brisbane, City of Colma, City of South San Francisco, and City of Pacifica planning jurisdictions. All planning departments were contacted regarding projected development. According to the City of San Bruno, development is not projected in the small area of the District's boundary located in that jurisdiction. According to the other planning jurisdictions, a total of 6,687 residential units may be constructed within District boundaries in the next 20 years. Based on average square footages by unit type and planning jurisdiction, the total square footage projected is 8,204,985. Table 5 includes the breakdown of square footage by unit type. An estimated 6,687 housing units, totaling 8,204,985 square feet of space, may be constructed in the District over the next 20 years.

Table 5:
Summary of Projected Residential Square Footage

Planning Jurisdiction	Unit Type	Projected Units	Average Square Footage	Total Square Footage
Daly City	Multi-Family	937	1,000	937,000
Daly City	Single-Family	180	2,000	360,000
Daly City	ADU	1,000	600	600,000
Brisbane	Multi-Family	1,599	1,015	1,622,985
Brisbane	Single-Family	960	1,800	1,728,000
Brisbane	ADU	199	1,000	199,000
Colma	Multi-Family	317	1,000	317,000
Colma	Single-Family	20	2,000	40,000
Colma	ADU	10	600	6,000
South SF	ADU	100	900	90,000
Pacifica	Single-Family	1,000	2,000	2,000,000
Pacifica	ADU	200	700	140,000
San Mateo County	Multi-Family	165	1,000	165,000
Total		6,687		8,204,985

Source: Jack Schreder & Associates, Jefferson Union High School District, Office of Public School Construction, Daly City, Brisbane, Colma, South San Francisco, Pacifica, San Mateo County.

Based on the District's reconstruction/modernization need of \$14,764,288 generated by students from residential construction and the total projected residential square footage of 8,204,985, residential construction will create a facilities cost of \$1.80 per square foot. The calculation is included in Table 6. However, the Level I statutory fee for residential construction is \$4.08 per square foot and the District has a fee sharing arrangement with its feeder districts. The High School District receives 40 percent of the fee and the feeder districts receive 60 percent of the fee. Therefore, the District is justified in collecting \$1.63 (40 percent of \$4.08) per square foot of residential construction.

Table 6:
Facilities Cost per SF from Proposed Residential Construction

Reconstruction/Modernization Need	Total Square Footage	Facilities Cost per SF
\$14,764,288	/8,204,985	= \$1.80

Source: Jefferson Union High School District, Jack Schreder & Associates, Office of Public School Construction.

Impact of Other Residential Development

In addition to new residential development projects that typically include new single-family homes and new multi-family units, the District can also be impacted by additional types of new development projects. These include, but are not limited to redevelopment projects, additions to existing housing units, and replacement of existing housing units with new housing units.

Commercial / Industrial Development and Fee Projections

In order to levy developer fees on commercial and industrial development, a district must conduct a study to determine the impact of the increased number of employees anticipated to result from commercial and industrial development upon the cost of providing school facilities within the district. For the purposes of making this determination, the [developer fee justification] study shall utilize employee generation estimates that are calculated on either an individual project or categorical basis. Those employee generation estimates shall be based upon commercial and industrial factors within the district or upon, in whole or part, the applicable employee generation estimates as set forth in the January 1990 edition of "San Diego Traffic Generators," a report of the San Diego Association of Governments. (Education Code Section 17621) The initial study that was completed in January of 1990 (updated annually) identifies the number of employees generated for every 1,000 square feet of floor area for several development categories. These generation factors are shown in Table 7.

Table 7 indicates the number of employees generated for every 1,000 square feet of new commercial and industrial development and the number of District households generated for every employee in 12 categories of commercial and industrial

development. The number of District households is calculated by adjusting the number of employees for the percentage of employees that live in the District and are heads of households. School facility costs for development projects not included on the list may be estimated by using the closest employee per 1,000 square feet ratio available for the proposed development.

In addition, an adjustment in the formula is necessary so that students moving into new residential units that have paid residential fees are not counted in the commercial/industrial fee calculation. Forty percent of all employees in the District live in existing housing units. The forty percent adjustment eliminates double counting the impact. This adjustment is shown in the worksheets in Appendix D and in Table 7. Appendix D also includes the weighted average student generation rate utilized to calculate the commercial/industrial rates.

These adjustment factors are based on surveys of commercial and industrial employees in school districts similar to the District. When these figures are compared to the cost to house students, it can be shown that each square foot of commercial and industrial development creates a cost impact greater than the maximum fee, with the exception of mini storage and agriculture. The data in Table 8 is based on the per student costs shown in Table 2. These figures are multiplied by the student yield factor to determine the number of students generated per square foot of commercial and industrial development. To determine the school facilities square foot impact of commercial and industrial development shown in Table 8, the students per square foot are multiplied by the cost of providing school facilities.

Table 7:
Commercial and Industrial Generation Factors

Type of Development	*Employees per 1,000 sf	**Dist HH Per Emp.	% Emp in Exist HH	Adj.%Emp Dist HH/Emp
Medical Offices	4.27	.2	.4	.08
Corporate Offices	2.68	.2	.4	.08
Commercial Offices	4.78	.2	.4	.08
Lodging	1.55	.3	.4	.12
Scientific R&D	3.04	.2	.4	.08
Industrial Parks	1.68	.2	.4	.08
Industrial/Business Parks	2.21	.2	.4	.08
Neighborhood Shopping Centers	3.62	.3	.4	.12
Community Shopping Centers	1.09	.3	.4	.12
Banks	2.82	.3	.4	.12
Mini-Storage	.06	.2	.4	.08
Agriculture	.31	.5	.4	.20

* Source: San Diego Association of Governments.

** Source: Jack Schreder and Associates. Original Research.

Table 8:
Commercial and Industrial Facilities Cost Impact

Type of Development	Cost Impact Per Sq. Ft.
Medical Offices	\$0.75
Corporate Offices	\$0.47
Commercial Offices	\$0.84
Lodging	\$0.41
Scientific R&D	\$0.54
Industrial/Business Parks	\$0.30
Industrial/Com Park	\$0.39
Commercial Shopping Centers	\$0.96
Community Shopping Centers	\$0.29
Banks	\$0.75
Mini-Storage	\$0.01
Agriculture	\$0.14

*Sources: San Diego Association of Governments and Jack Schreder and Associates, Original Research.

Table 8 shows that all types of commercial and industrial development will create a square foot cost justifying a commercial/industrial fee. Thus, a reasonable relationship between commercial and industrial development and the impact on the District is shown. Based on this relationship, the levying of commercial and industrial developer fees is justified in the District.

Summary

The cost impact on the District imposed by new students to be generated from new residential, commercial, and industrial development is greater than the maximum allowable fees. Each square foot of residential development creates a school facility cost of \$1.80 per square foot. Each square foot of commercial and industrial development creates a school facility cost ranging from \$0.01 to \$0.96 per square foot. The cost to provide additional school facilities exceeds the amount of residential and commercial/industrial fees to be generated directly and indirectly by residential construction. However, the District currently has a Level I Fee Sharing Agreement with its feeder elementary school districts. The Jefferson Union High School District receives 40 percent of the Level I fee and its feeder elementary school districts receive 60 percent of the Level I Fee. Therefore, the Jefferson Union High School District is justified in collecting \$1.63 (40 percent of \$4.08) per square foot of residential construction and \$0.26 (40 percent of \$0.66) per square foot of commercial/industrial construction, with the exception of mini storage and agriculture construction. The mini storage category of construction should be collected at the rate of \$0.01 per square foot and agriculture should be collected at \$0.14 per square foot.

SECTION II: BACKGROUND OF DEVELOPER FEE LEGISLATION

Initially, the allowable developer fee was limited by Government Code Section 65995 to \$1.50 per square foot of covered or enclosed space for residential development and \$0.25 per square foot of covered or enclosed space of commercial or industrial development. The Level I fee that can be levied is adjusted every two years, according to the inflation rate as listed by the state-wide index for Class B construction set by the State Allocation Board. In January of 2020, the State Allocation Board changed the Level I fee to \$4.08 per square foot of residential construction and \$0.66 per square foot of commercial and industrial construction.

The fees collected are to be used by the school district for the construction or reconstruction/modernization of school facilities and may be used by the district to pay bonds, notes, loans, leases or other installment agreements for temporary as well as permanent facilities.

Senate Bill 519 (Chapter 1346/Statutes of 1987) added Section 17625 to the Education Code. It provides that a school district can charge a fee on manufactured or mobile homes only in compliance with all of the following:

1. The fee, charge, dedication, or other form of requirement is applied to the initial location, installation, or occupancy of the manufactured home or mobile home within the school district.
2. The manufactured home or mobile home is to be located, installed, or occupied on a space or site on which no other manufactured home or mobile home was previously located, installed, or occupied.
3. The manufactured home or mobile home is to be located, installed, or occupied on a space in a mobile home park, on which the construction of the pad or foundation system commenced after September 1, 1986.

Senate Bill 1151 (Chapter 1037/Statutes of 1987) concerns agricultural buildings and adds Section 17622 to the Education Code. It provides that no school fee may be imposed and collected on a greenhouse or other space covered or enclosed for agricultural purposes unless the school district has made findings supported by substantial evidence as follows:

1. The amount of the fees bears a reasonable relationship and is limited to the needs for school facilities created by the greenhouse or other space covered or enclosed for agricultural purposes.
2. The amount of the fee does not exceed the estimated reasonable costs of the school facilities necessitated by the structures as to which the fees are to be collected.

3. In determining the amount of the fees, the school district shall consider the relationship between the proposed increase in the number of employees, if any, the size and specific use of the structure, as well as the cost of construction.

In order to levy developer fees, a study is required to assess the impact of new growth and the ability of the local school district to accommodate that growth. The need for new school construction and reconstruction/modernization must be determined along with the costs involved. The sources of revenue need to be evaluated to determine if the district can fund the new construction and reconstruction/modernization. Finally, a relationship between needs and funding raised by the fee must be quantified.

Assembly Bill 3980 (Chapter 418/Statutes of 1988) added Government Code Section 66006 to require segregation of school facilities fees into a separate capital facilities account or fund and specifies that those fees and the interest earned on those fees can only be expended for the purposes for which they were collected.

Assembly Bill 181 (Chapter 1109/Statutes of 1989) which became effective October 2, 1989, was enacted to clarify several areas of developer fee law. Assembly Bill 181 provisions include the following:

1. Exempts residential remodels of less than 500 square feet from fees.
2. Prohibits the use of developer fee revenue for routine maintenance and repair, most asbestos work, and deferred maintenance.
3. Allows the fees to be used to pay for the cost of performing developer fee justification studies.
4. States that fees are to be collected at the time of occupancy, unless the district can justify earlier collection. The fees can be collected at the time the building permit is issued if the district has established a developer fee account and funds have been appropriated for which the district has adopted a proposed construction schedule or plan prior to the issuance of the certificate of occupancy.

5. Clarifies that the establishment or increase of fees is not subject to the California Environmental Quality Act.
6. Clarifies that the impact of commercial and industrial development may be analyzed by categories of development as well as an individual project-by-project basis. An appeal process for individual projects would be required if analysis was done by categories.
7. Changes the frequency of the annual inflation adjustment on the Level I fee to every two years.
8. Exempts from fees - development used exclusively for religious purposes, private schools, and government-owned development.
9. Expands the definition of senior housing, which is limited to the commercial/industrial fee and requires the conversion from senior housing to be approved by the city/county after notification of the school district.
10. Extends the commercial/industrial fee to mobile home parks limited to older persons.

Assembly Bill 3228 (Chapter 1602/Statutes of 1990) added Government Code Section 66016 requiring districts adopting or increasing any fee to first hold at least one open and public hearing as part of a regularly scheduled meeting and publish notice of this meeting twice, with the first notice published at least ten days prior to the meeting.

SECTION III: REQUIREMENTS OF AB 1600

Assembly Bill 1600 (Chapter 927/Statutes of 1987) adds Section 66000 through 66003 to the Government Code:

Section 66000 defines various terms used in AB 1600:

"Fee" is defined as monetary exaction (except a tax or a special assessment) which is charged by a local agency to the applicant in connection with the approval of a development project for the purpose of defraying all or a portion of the costs of public facilities related to the development project.

"Development project" is defined broadly to mean any project undertaken for purposes of development. This would include residential, commercial, or industrial projects.

"Public facilities" is defined to include public improvements, public services, and community amenities.

Section 66001 (a) sets forth the requirements for establishing, increasing or imposing fees. Local agencies are required to do the following:

1. Identify 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 how there is a reasonable relationship between the need for the public facility and the type of development project on which the fee is imposed.

Section 66001 (c) requires that any fee subject to AB 1600 be deposited in an account established pursuant to Government Code Section 66006. Section 66006 requires that development fees be deposited in a capital facilities account or fund. To avoid any commingling of the fees with other revenues and funds of the local agency, the fees can only be expended for the purpose for which they were collected. Any income earned on the fees should be deposited in the account and expended only for the purposes for which the fee was collected.

Section 66001 (d) as amended by Senate Bill 1693 (Monteith/Statutes of 1996, Chapter 569), requires that for the fifth year following the first deposit into a developer fee fund, and for every five years thereafter, a school district must make certain findings as to such funds. These findings are required regardless of whether the funds are committed or uncommitted. Formerly only remaining unexpended or uncommitted fees were subject to the mandatory findings and potential refund process. Under this section as amended, relating to unexpended fee revenue, two specific findings must be made as a part of the public information required to be formulated and made available to the public. These findings are:

1. Identification of all sources and amounts of funding anticipated to provide adequate revenue to complete any incomplete improvements identified pursuant to the requirements of Section 66001 (a)(2).
2. A designation of the approximate date upon which the anticipated funding will be received by the school district to complete the identified but as yet, incomplete improvements.

If the two findings are not made, a school district must refund the developer fee revenue on account in the manner provided in Section 66001 (e).

Section 66001 (e) provides that the local agency shall refund to the current record owners of the development project or projects on a prorated basis the unexpended or uncommitted portion of the fees and any accrued interest for which the local agency is unable to make the findings required by Section 66001 (d) that it still needs the fees.

Section 66002 provides that any local agency which levies a development fee subject to Section 66001 may adopt a capital improvement plan which shall be updated annually and which shall indicate the approximate location, size, time of availability and estimates of cost for all facilities or improvements to be financed by the fees.

Assembly Bill 1600 and the Justification for Levying Developer Fees

Effective January 1, 1989, Assembly Bill 1600 requires that any school district which establishes, increases or imposes a fee as a condition of approval of development shall make specific findings as follows:

1. A cost nexus must be established. A cost nexus means that the amount of the fee cannot exceed the cost of providing adequate school facilities for students generated by development. Essentially, it prohibits a school district from charging a fee greater than their cost to construct or modernize facilities for use by students generated by development.
2. A benefit nexus must be established. A benefit nexus is established if the fee is used to construct or modernize school facilities benefiting students to be generated from development projects.
3. A burden nexus must be established. A burden nexus is established if a project, by the generation of students, creates a need for additional facilities or a need to modernize existing facilities.

SECTION IV: REVENUE SOURCES FOR FUNDING FACILITIES

Two general sources exist for funding facility construction and reconstruction/modernization - state sources and local sources. The District has considered the following available sources:

State Sources

State School Facility Program

Senate Bill 50 reformed the State School Building Lease-Purchase Program in August of 1998. The new program, entitled the School Facility Program, provides funding under a “grant” program once a school district establishes eligibility. Funding required from districts will be a 50/50 match for construction projects and 60/40 (District/State) match for reconstruction/modernization projects. Districts may levy the current statutory developer fee as long as a district can justify collecting that fee. If

a district desires to collect more than the statutory fee (Level 2 or Level 3), that district must meet certain requirements outlined in the law, as well as conduct a needs assessment to enable a higher fee to be calculated.

Local Sources

Mello-Roos Community Facilities Act

The Mello-Roos Community Facilities Act of 1982 allows school districts to establish a community facilities district in order to impose a special tax to raise funds to finance the construction of school facilities.

1. The voter approved tax levy requires a two-thirds vote by the voters of the proposed Mello-Roos district.
2. If a Mello-Roos district is established in an area in which fewer than twelve registered voters reside, the property owners may elect to establish a Mello-Roos district.

General Obligation Bonds

General Obligation (GO) bonds may be issued by any school district for the purposes of purchasing real property or constructing or purchasing buildings or equipment "of a permanent nature." Because GO bonds are secured by an ad valorem tax levied on all taxable property in the district, their issuance is subject to two-thirds voter approval or 55% majority vote under Proposition 39 in an election. School districts are obligated, in the event of delinquent payments on the part of the property owners, to raise the amount of tax levied against the non-delinquent properties to a level sufficient to pay the principal and interest coming due on the bonds.

The District passed a \$33 million bond, Measure J, in June 2018 to fund housing for District staff and teachers.

Developer Fees

The District's developer fees are dedicated to the current needs related directly to reconstruction/modernization and replacement of school facilities.

School District General Funds

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

Expenditure of Lottery Funds

State law prohibits the use of lottery funds for facilities. Government Code Section 8880.5 states: "It is the intent of this chapter that all funds allocated from the California State Lottery Education Fund shall be used exclusively for the education of pupils and students and no funds shall be spent for acquisition of real property, construction of facilities, financing research, or any other non-instructional purpose."

Surplus Property

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

Parcel Taxes

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

SECTION V: ESTABLISHING THE COST, BENEFIT AND BURDEN NEXUS

In accordance with Government Code Section 66001, the District has established a cost nexus and identified the purpose of the fee, established a benefit nexus, and a burden nexus:

Establishment of a Cost Nexus & Identify Purpose of the Fee

The Jefferson Union High School District chooses to replace and/or modernize facilities for the additional students created by development in the district and the cost to replace and/or modernize facilities exceeds the amount of developer fees to be collected. It is clear that when educational facilities are provided for students generated by new residential, commercial and industrial development that the cost of replacing and/or modernizing facilities exceeds developer fee generation, thereby establishing a cost nexus.

Establishment of a Benefit Nexus

Students generated by new residential, commercial and industrial development will be attending District schools. Housing District students in replaced and/or modernized facilities will directly benefit those students from the new development projects upon which the fee is imposed, therefore, a benefit nexus is established.

Establishment of a Burden Nexus

The generation of new students by development will create a need for additional and/or modernized school facilities. The District must carry the burden of replacing and/or modernizing facilities required by the students generated by future developments and the need for replacing and/or modernizing facilities will be, in part, satisfied by the levying of developer fees, therefore, a burden nexus is established.

SECTION VI: FACILITY FUNDING ALTERNATIVES

The District does not currently have funds to provide for the shortfall in reconstruction/modernization costs. We suggest the District continue to participate in the State School Facility Program to access State facility funds.

STATEMENT TO IDENTIFY PURPOSE OF FEE

It is a requirement of AB 1600 that the District identify the purpose of the fee. The purpose of fees being levied shall be used for the replacement and/or reconstruction/modernization of school facilities. The District will provide for the replacement and/or modernization of school facilities, in part, with developer fees. The District completed a Facility Master Plan in 2014, which includes a summary of District facility needs by school site. Projects include a variety of items, such as expanding ancillary facilities, addressing ADA issues, reroofing, addressing structural issues, replacing portables, and modernizing restrooms and other facilities. Projects included in the 2014 Master Plan exceed available funds.

ESTABLISHMENT OF A SPECIAL ACCOUNT

Pursuant to Government Code section 66006, the District has established a special account in which fees for capital facilities are deposited. The fees collected in this account will be expended only for the purpose for which they were collected. Any interest income earned on the fees that are deposited in such an account must remain with the principal. The school district must make specific information available to the public within 180 days of the end of each fiscal year pertaining to each developer fee fund. The information required to be made available to the public by Section 66006 (b) (1) was amended by SB 1693 and includes specific information on fees expended and refunds made during the year.

RECOMMENDATION

Based on the fee justification provided in this report, it is recommended that the Jefferson Union High School District levy residential development fees and commercial/industrial fees up to the statutory fee for which justification has been determined.

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APPENDIX A
PER PUPIL CONSTRUCTION COST

High School Facility Construction Costs - Permanent Construction		
I. Allowable Building Area		
	A. Total Student Capacity	
	B. Building Area	
	1500 students @ 92sf/student	138,000
	Speech/Resource Specialist	<u>4,500</u>
	Total	142,500
II. Site Requirements		
	A. Purchase Price of Property (40 Acres)	
	Cost per Acre	\$0
	B. Appraisals	\$0
	C. Costs Incurred in Escrow	\$0
	D. Surveys	\$0
	E. Other Costs, Geo. and Soils Reports	<u>\$0</u>
	Total-Acquisition of Site	\$0
III. Plans		
	A. Architect's Fee for Plans	\$6,249,718
	B. OSA Plans Check Fee	\$486,089
	C. School Planning, Plans Check Fee	\$9,618
	D. Preliminary Tests	\$15,573
	E. Other Costs, Energy Cons. & Advertising	<u>\$142,211</u>
		\$6,903,210
IV. Construction Requirements		
	A. Utility Services	\$1,297,805
	B. Off-site Development	\$1,327,303
	C. Site Development, Service	\$4,276,861
	D. Site Development, General	\$3,215,021
	E. New Construction	\$57,000,000
	F. Unconventional Energy Source	<u>\$2,324,325</u>
	Total Construction	\$69,441,315
	Total Items II, III and IV	\$76,344,525
	Contingency 10%	\$7,634,452
	Construction Tests	\$520,810
	Inspection	\$694,413
	TOTAL ESTIMATED PROJECT COSTS	\$85,194,200
	ESTIMATED COST PER STUDENT	\$56,796
*Source: California Department of Education, Jack Schreder & Associates.		

APPENDIX B
PER PUPIL GRANT AMOUNTS

ATTACHMENT B

ANNUAL ADJUSTMENT TO SCHOOL FACILITY PROGRAM GRANTS

State Allocation Board Meeting, January 22, 2020

Grant Amount Adjustments

New Construction	SFP Regulation Section	Adjusted Grant Per Pupil Effective 1-1-19	Adjusted Grant Per Pupil Effective 1-1-20
Elementary	1859.71	\$12,197	\$12,451
Middle	1859.71	\$12,901	\$13,169
High	1859.71	\$16,415	\$16,756
Special Day Class – Severe	1859.71.1	\$34,274	\$34,987
Special Day Class – Non-Severe	1859.71.1	\$22,922	\$23,399
Automatic Fire Detection/Alarm System – Elementary	1859.71.2	\$15	\$15
Automatic Fire Detection/Alarm System – Middle	1859.71.2	\$20	\$20
Automatic Fire Detection/Alarm System – High	1859.71.2	\$33	\$34
Automatic Fire Detection/Alarm System – Special Day Class – Severe	1859.71.2	\$61	\$62
Automatic Fire Detection/Alarm System – Special Day Class – Non-Severe	1859.71.2	\$43	\$44
Automatic Sprinkler System – Elementary	1859.71.2	\$205	\$209
Automatic Sprinkler System – Middle	1859.71.2	\$243	\$248
Automatic Sprinkler System – High	1859.71.2	\$253	\$258
Automatic Sprinkler System – Special Day Class – Severe	1859.71.2	\$646	\$659
Automatic Sprinkler System – Special Day Class – Non-Severe	1859.71.2	\$433	\$442

ATTACHMENT B

ANNUAL ADJUSTMENT TO SCHOOL FACILITY PROGRAM GRANTS

State Allocation Board Meeting, January 22, 2020

Grant Amount Adjustments

Modernization	SFP Regulation Section	Adjusted Grant Per Pupil Effective 1-1-19	Adjusted Grant Per Pupil Effective 1-1-20
Elementary	1859.78	\$4,644	\$4,741
Middle	1859.78	\$4,912	\$5,014
High	1859.78	\$6,431	\$6,565
Special Day Class - Severe	1859.78.3	\$14,802	\$15,110
Special Day Class – Non-Severe	1859.78.3	\$9,903	\$10,109
State Special School – Severe	1859.78	\$24,672	\$25,185
Automatic Fire Detection/Alarm System – Elementary	1859.78.4	\$151	\$154
Automatic Fire Detection/Alarm System – Middle	1859.78.4	\$151	\$154
Automatic Fire Detection/Alarm System – High	1859.78.4	\$151	\$154
Automatic Fire Detection/Alarm System – Special Day Class – Severe	1859.78.4	\$415	\$424
Automatic Fire Detection/Alarm System – Special Day Class – Non-Severe	1859.78.4	\$278	\$284
Over 50 Years Old – Elementary	1859.78.6	\$6,452	\$6,586
Over 50 Years Old – Middle	1859.78.6	\$6,824	\$6,966
Over 50 Years Old – High	1859.78.6	\$8,933	\$9,119
Over 50 Years Old – Special Day Class – Severe	1859.78.6	\$20,565	\$20,993
Over 50 Years Old – Special Day Class – Non-Severe	1859.78.6	\$13,752	\$14,038
Over 50 Years Old – State Special Day School – Severe	1859.78.6	\$34,273	\$34,986

APPENDIX C
PROJECTED DEVELOPMENT

Jefferson Union High School District
Development Summary

Planning Jurisdiction: Daly City

<u>Project</u>	<u>Housing Type</u>	<u>Units</u>
Serramonte Condominiums	MF	323
Geneva Ave	MF	7
Geneva/Rio Verde	MF	20
Castle/Third Greenhouse	MF	23
493 Eastmoor	MF	72
88 Hillside & 6401 Mission	MF	167
305 Eastmoor	MF	56
2665 Geneva	MF	72
130 Station Ave	MF	12
East Market	MF	30
St Francis Court Condominiums	MF	87
Bryant Street	MF	48
First Ave Greenhouses	MF	<u>20</u>
<i>Multi-Family Subtotal</i>		<i>937</i>
Washington/Bryant	SF	5
Edgeworth Greenhouse	SF	3
Calgary St/Rio Verde	SF	8
Rio Verde Greenhouse	SF	7
Lisbon Street	SF	4
Point Martin (1)	SF	16
Point Martin (2)	SF	117
Samoan Church	SF	<u>20</u>
<i>Single-Family Subtotal</i>		<i>180</i>
Multiple	ADU	1,000
Daly City Total		2,117

Planning Jurisdiction: Brisbane

<u>Project</u>	<u>Housing Type</u>	<u>Units</u>
Multiple	MF	1,599
Multiple	SF	960
Multiple	ADU	199
Brisbane Total		2,758

Planning Jurisdiction: Colma

<u>Project</u>	<u>Housing Type</u>	<u>Units</u>
Mission Road	MF	20
El Camion Real Corridor	MF	<u>297</u>
<i>Multi-family Subtotal</i>		<i>317</i>
Sterling Park	SF	20
Sterling Park	ADU	10
Colma Total		347

Jefferson Union High School District
Development Summary

Planning Jurisdiction: South San Francisco

<u>Project</u>	<u>Housing Type</u>	<u>Units</u>
Multiple	ADU	100
South San Francisco Total		100

Planning Jurisdiction: Pacifica

<u>Project</u>	<u>Housing Type</u>	<u>Units</u>
Multiple	SF	1,000
Multiple	ADU	200
Pacifica Total		1,200

Planning Jurisdiction: San Mateo County

<u>Project</u>	<u>Housing Type</u>	<u>Units</u>
Multiple	MF	165
San Mateo County Total		165

Combined Multi-Family Total	3,018
Combined Single-Family Total	2,160
Combined Accessory Dwelling Unit Total	1,509

Jefferson Union High School District Development Total 6,687

APPENDIX D

**COMMERCIAL/INDUSTRIAL
CALCULATIONS**

Jefferson Union High School District						
Commercial/Industrial Calculations						
	EMP/ 1000 SQ.FT	DIST.HH/ EMP	HH/SF	% EMP IN EXIST HH	ADJUSTED HH/SF	ADJ % DIST HH/EMP
MEDICAL	4.27	0.2	0.000854	0.4	0.0003416	0.08
CORP. OFFICE	2.68	0.2	0.000536	0.4	0.0002144	0.08
COM. OFFICE	4.78	0.2	0.000956	0.4	0.0003824	0.08
LODGING	1.55	0.3	0.000465	0.4	0.0001860	0.12
R&D	3.04	0.2	0.000608	0.4	0.0002432	0.08
IN. PARK	1.68	0.2	0.000336	0.4	0.0001344	0.08
IN/COM PARK	2.21	0.2	0.000442	0.4	0.0001768	0.08
NBHD COMM SC	3.62	0.3	0.001086	0.4	0.0004344	0.12
COMMUNITY SC	1.09	0.3	0.000327	0.4	0.0001308	0.12
BANKS	2.82	0.3	0.000846	0.4	0.0003384	0.12
MINI-STORAGE	0.06	0.2	0.000012	0.4	0.0000048	0.08
AGRICULTURE	0.31	0.5	0.000155	0.4	0.0000620	0.20
STUDENT GENERATION RATE			COST PER STUDENT			
9-12	0.0921		9-12	\$23,968		
(weighted average attached)						
STUDENTS PER SQUARE FOOT						
(YIELD FACTORS X ADJ HH/SQ. FT IN COLUMN F)						
	9-12					
MEDICAL	0.000031					
CORP. OFFICE	0.000020					
COM. OFFICE	0.000035					
LODGING	0.000017					
R&D	0.000022					
IN. PARK	0.000012					
IN/COM PARK	0.000016					
COM. SC.	0.000040					
COMMUNITY SC	0.000012					
BANKS	0.000031					
MINI STORAGE	0.000000					
AGRICULTURE	0.000006					
COSTS PER SQUARE FOOT						
(STUDENTS/ SQ. FOOT X STUDENT COST/SQ. FOOT IN EACH CATEGORY)						
	9-12					
MEDICAL	\$0.75					
CORP. OFFICE	\$0.47					
COM. OFFICE	\$0.84					
LODGING	\$0.41					
R&D	\$0.54					
IN. PARK	\$0.30					
IN/COM PARK	\$0.39					
COM. SC.	\$0.96					
COMMUNITY SC	\$0.29					
BANKS	\$0.75					
MINI STORAGE	\$0.01					
AGRICULTURE	\$0.14					

Jefferson Union High School District

Weighted Student Generation Rate to Calculate Commercial/Industrial Rates

Unit Type	Number of Units	Student Generation Rate	Students Projected
Multi-Family	3,018	0.111	335
Single-Family	2,160	0.053	114
Accessory Dwelling Units	<u>1,509</u>	0.111	<u>167</u>
Total	6,687		616
Weighted Student Generation Rate (616/6,687)	0.0921		