



► **RESIDENTIAL AND  
COMMERCIAL/INDUSTRIAL  
DEVELOPMENT SCHOOL FEE JUSTIFICATION  
STUDY**

SIERRA SANDS UNIFIED SCHOOL DISTRICT

**MAY 5, 2022**

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# ▶ TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
<b>EXECUTIVE SUMMARY .....</b>	<b>ES-1</b>
<b>I. INTRODUCTION .....</b>	<b>1</b>
<b>II. LEGISLATION.....</b>	<b>2</b>
<b>III. METHODOLOGY OF STUDY.....</b>	<b>5</b>
<b>IV. FACILITIES CAPACITY AND STUDENT ENROLLMENT .....</b>	<b>10</b>
<b>V. IMPACT OF RESIDENTIAL DEVELOPMENT ON SCHOOL FACILITIES NEEDS .....</b>	<b>11</b>
<b>VI. IMPACT OF COMMERCIAL/INDUSTRIAL DEVELOPMENT ON SCHOOL FACILITIES NEEDS .....</b>	<b>20</b>
<b>VII. CONCLUSION.....</b>	<b>28</b>

## EXHIBITS

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### **EXHIBIT A:**

Updated School Facilities Capacity Calculation

## EXECUTIVE SUMMARY

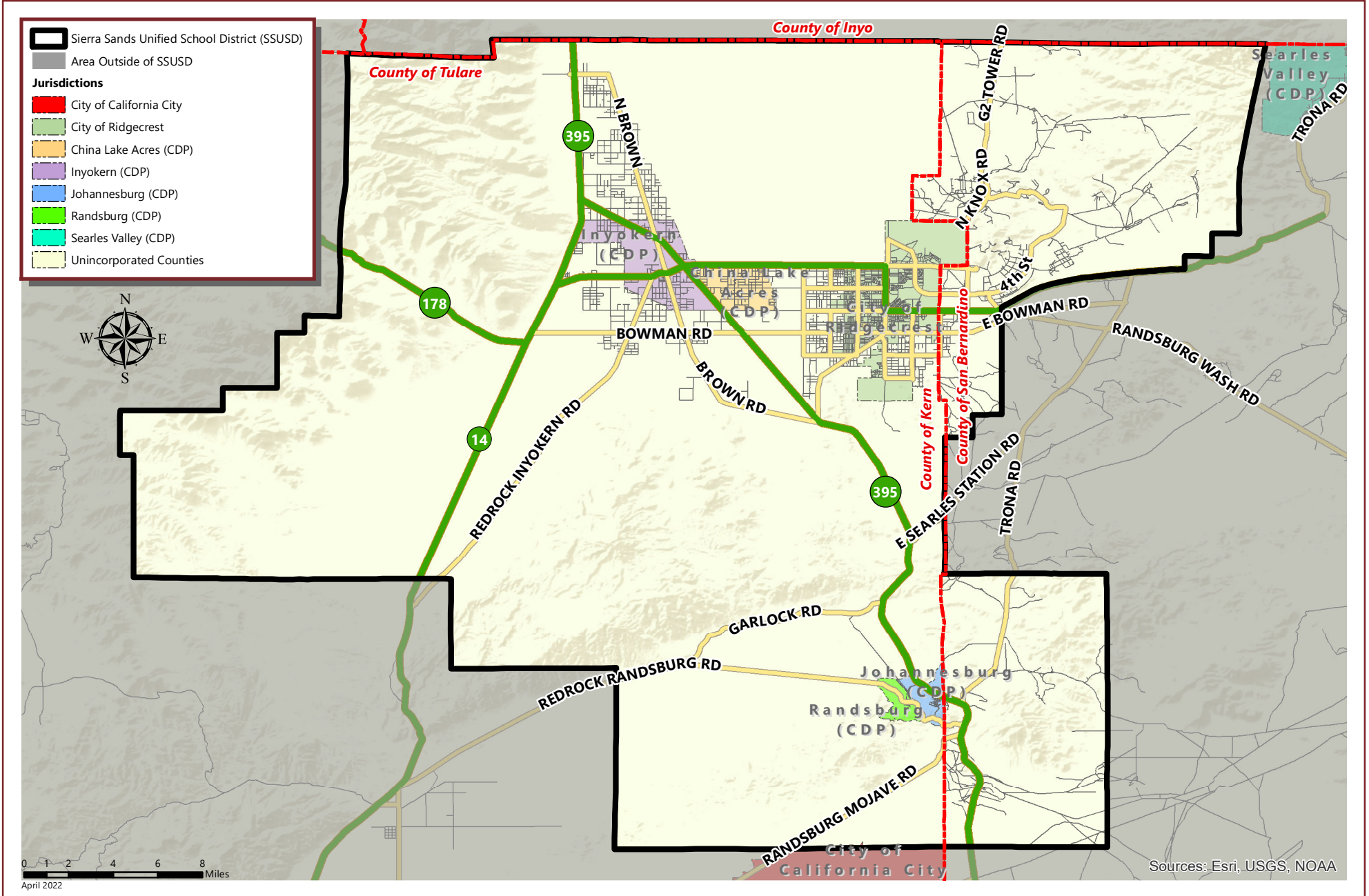
This Residential and Commercial/Industrial Development School Fee Justification Study ("Study") is intended to determine the extent to which a nexus can be established in the Sierra Sands Unified School District ("School District") between residential and commercial/industrial development ("CID") and (i) the need for school facilities, (ii) the cost of school facilities, and (iii) the amount of statutory school fees ("School Fees") per residential and CID building square foot that may be levied for schools pursuant to the provisions of Section 17620 of the Education Code, as well as Sections 65995 and 66001 of the Government Code, Assembly Bill ("AB") 181, and subdivision (e) of Section 17621 of the Education Code.

The School District provides education to students in grades transitional kindergarten ("TK") through 12 residing within the City of Ridgecrest ("City") and portions of the unincorporated counties of Kern and San Bernardino (collectively, "Counties") (please see map on following page for a geographic profile of the School District). Collectively, the School District's school facilities in school year 2021/2022 have a capacity of 5,445 students based on calculations by Cooperative Strategies for the School District's 2019 Facilities Master Plan. Of these 5,445 seats, 2,748 are at the elementary school level (i.e., grades TK through 5), 1,064 are at the middle school level (i.e., grades 6 through 8), and 1,633 are at the high school level (i.e., grades 9 through 12) (see Exhibit A for an updated school facilities capacity calculation). Based on data provided by the School District, student enrollment is 5,114 in school year 2021/2022. Comparing student enrollment to facilities capacity reveals that facilities capacity exceeds student capacity at all school levels in school year 2021/2022 (please see Section IV for more information on student enrollment and facilities capacity).

To establish a nexus and a justifiable residential School Fee level, the Study evaluated the number and cost of new facilities required to house students generated from future residential development within the School District. Based on data provided by the Kern Council of Governments ("KCOG") approximately 4,540 additional residential units are expected to be constructed within the School District's boundaries through calendar year 2035 ("Future Units"). Of these 4,540 Future Units, 3,405 are expected to be single family detached ("SFD") and 1,135 are expected to be multi-family attached ("MFA") units.

# SIERRA SANDS UNIFIED SCHOOL DISTRICT

# GEOGRAPHIC PROFILE



To determine the impact on the School District from Future Units, the Study first multiplied the number of Future Units by the student generation factors ("SGFs") calculated by Cooperative Strategies, to determine the projected student enrollment from Future Units. The results were that 560 unhoused elementary school students, 90 unhoused middle school students, and 344 unhoused high school students are anticipated to be generated from Future Units. These numbers include a reduction of the number of students projected to be housed by existing excess seats ("Projected Unhoused Students").

To adequately house the Projected Unhoused Students, the School District will need to construct new elementary school facilities and expand existing middle school and high school facilities. Using design capacities of 450 students at the elementary school level, 27 students per classroom at the middle school level, and 27 students per classroom at the high school level, the School District will need to construct two (2) new elementary schools, four (4) new middle school classrooms and thirteen (13) new high school classrooms to accommodate the Projected Unhoused Students from the Future Units projected to be constructed at this time. Based on school facility cost estimates provided by the School District, an elementary school is projected to cost \$92,800,000. The cost of expanding the existing middle school and high school facilities by adding additional teaching stations is based on per-pupil grant amounts established by Senate Bill ("SB") 50.

In addition to the school facilities cost impacts, the School District will experience Central Administrative and Support Facilities cost impacts. In January 1994, the State Allocation Board ("SAB") approved a policy of four (4) square feet of Central Administrative and Support Facilities per student, which based on School District cost estimates equates to a per-student cost of \$800. Multiplying these costs by the facilities needed and the students generated yielded the total school facilities cost impacts shown in Table ES-1 on the following page.

T A B L E E S - 1  
**TOTAL SCHOOL FACILITIES COST IMPACTS FROM  
 FUTURE UNITS (2022\$)**

School Levels	Cost Per Facility/ Teaching Station	Facilities/ Teaching Stations Required/Students Generated	Total School Facilities Cost Impacts
<b>Elementary School</b>	\$92,800,000	1.2444	\$115,480,320
<b>Middle School</b>	\$852,174	3.3333	\$2,840,552
<b>High School</b>	\$1,081,134	12.7407	\$13,774,404
<b>Central Admin Impacts</b>	\$800	994	\$795,200
<b>Total</b>	<b>N/A</b>	<b>N/A</b>	<b>\$132,890,476</b>

The amounts listed in Table ES-1 were apportioned to each land use class based on the number of students generated from such residential land use. Thereafter, the school facilities cost impacts for each land use class were divided by the number of Future Units to calculate the school facilities cost impacts per residential unit. Table ES-2 below lists the school facilities cost impacts per residential unit.

T A B L E E S - 2  
**SCHOOL FACILITIES COST IMPACTS PER RESIDENTIAL UNIT (2022\$)**

Land Use	Total School Facilities Cost Impacts	Future Units	School Facilities Cost Impacts per Residential Unit
<b>Single Family Detached</b>	\$117,915,193	3,405	\$34,630
<b>Multi-Family Attached</b>	\$14,975,283	1,135	\$13,194

To determine the school facilities cost impacts per square foot of residential construction, the school facilities cost impacts per unit were divided by the average square footage of a residential unit in each land use class. Table ES-3 on the following page lists the school facilities cost impacts per average residential square foot.

T A B L E E S - 3

**SCHOOL FACILITIES COST IMPACTS PER RESIDENTIAL SQUARE FOOT  
(2022\$)**

<b>Land Use</b>	<b>School Facilities Cost Impacts per Future Units</b>	<b>Average Square Footage</b>	<b>School Facilities Cost Impacts per Residential Square Foot</b>
<b>Single Family Detached</b>	\$34,630	2,071	\$16.72
<b>Multi-Family Attached</b>	\$13,194	1,150	\$11.47

To determine the commercial/industrial School Fee levels that satisfy the rigorous nexus requirements of AB 181, the Study divides CID into seven (7) land use categories: retail and services, office, research and development, industrial/warehouse/ manufacturing, hospital, hotel/motel, and self-storage. The employment impacts of each of these land uses, in terms of the number of employees per 1,000 square feet of building space, are based on information from the San Diego Association of Governments ("SANDAG") pursuant to Section 17621 (e)(1)(B) of the Education Code. These employee impacts are shown in Table ES-4.

T A B L E E S - 4

**EMPLOYMENT IMPACTS PER 1,000 SQUARE FEET CID**

<b>CID Land Use Category</b>	<b>Square Feet per Employee</b>	<b>Employees per 1,000 Square Feet</b>
<b>Retail and Service</b>	447	2.2371
<b>Office</b>	286	3.4965
<b>Research and Development</b>	329	3.0395
<b>Industrial/Warehouse/Manufacturing</b>	371	2.6954
<b>Hospital</b>	360	2.7778
<b>Hotel/Motel</b>	883	1.1325
<b>Self-Storage</b>	15,552	0.0643

Additional data from KCOG, the U.S. Bureau of Census ("Census"), and CoreLogic provide a basis for estimating net school district household impacts. This number includes only those households occupying new housing units within the School District, as opposed to existing units whose previous occupants may have included school-aged children. Multiplying net school district households by (i) the number of students per household and (ii) total school facilities costs per student, results in estimates of school facilities cost impacts. Collectively, this calculation represents the total school facilities cost impacts per 1,000 square feet of commercial/industrial floor space, expressed in 2022 dollars. These results are summarized in Table ES-5.

T A B L E E S - 5

**GROSS SCHOOL FACILITIES COSTS IMPACTS  
PER HOUSEHOLD (2022\$)**

School Level	Total Student Generation Impacts	Cost per Student	Gross School Facilities Costs Impacts per Unit
Elementary School	0.0111	\$189,425	\$2,102.62
Middle School	0.0036	\$9,073	\$32.66
High School	0.0030	\$35,841	\$107.52
<b>Impact per Household</b>	<b>N/A</b>	<b>N/A</b>	<b>\$2,242.80</b>

The revenue component of the Study estimates the potential fee revenues generated by CID, including residential fees paid by CID related households, as well as CID School Fees. CID related residential revenues are calculated based on the proposed residential School Fee of \$4.79 per square foot, justified in this Study. The residential revenues per household are then subtracted from the impact per household listed above. This results in net impact per household, as summarized in Table ES-6.

T A B L E E S - 6

**NET SCHOOL FACILITIES COST IMPACTS  
PER HOUSEHOLD (2022\$)**

Item	Amount
Impact per Household	\$2,242.80
Residential Revenue Per Household	\$280.41
<b>Net School Facilities Cost Impacts Per Household</b>	<b>\$1,962.39</b>



The net impact per household is then divided by the appropriate square feet per employee for each of the seven (7) CID land use categories to determine the cost impact per square foot of CID for each CID category, as shown in Table ES-7.

T A B L E E S - 7

**SCHOOL FACILITIES COST IMPACTS PER SQUARE FOOT (2022\$)**

<b>School Level</b>	<b>Net Impact per Household</b>	<b>Square Feet per Employee</b>	<b>Cost Impact per Square Foot Of CID</b>
<b>Retail and Services</b>	\$1,962.39	447	\$4.390
<b>Office</b>	\$1,962.39	286	\$6.862
<b>Research and Development</b>	\$1,962.39	329	\$5.965
<b>Industrial/Warehouse/Manufacturing</b>	\$1,962.39	371	\$5.289
<b>Hospital</b>	\$1,962.39	360	\$5.451
<b>Hotel/Motel</b>	\$1,962.39	883	\$2.222
<b>Self-Storage</b>	\$1,962.39	15,552	\$0.126

On February 23, 2022, the SAB increased the maximum Residential and CID School Fees authorized by Section 17620 of the Education Code from \$4.08 to \$4.79 per residential building square foot, and from \$0.66 to \$0.78 per CID square foot for unified school districts. As shown in Table ES-3, the impact per residential square foot exceeds the maximum residential School Fee per square foot and, therefore, School Fees would provide for less than 100 percent of the school facilities cost impacts. The Study concludes that the School District is fully justified in levying the maximum residential School Fee of \$4.79 per square foot for all new residential development within its boundaries subject to the limitations under the law.

Justification of the CID School Fee is based on a comparison of cost impacts per CID square foot, as shown in Table ES-7, against the maximum CID Fee per square foot as noted above. As shown in Table ES-8 on the following page, the School District is justified in levying:

T A B L E E S - 8

**MAXIMUM SCHOOL FEE PER SQUARE FOOT OF CID**

<b>CID Land Use Category</b>	<b>Maximum School Fee</b>
<b>Retail and Service</b>	\$0.78
<b>Office</b>	\$0.78
<b>Research and Development</b>	\$0.78
<b>Industrial/Warehouse/Manufacturing</b>	\$0.78
<b>Hospitals</b>	\$0.78
<b>Hotel/Motel</b>	\$0.78
<b>Self-Storage</b>	\$0.126

## I. INTRODUCTION

SB 50, which Governor Wilson signed on August 27, 1998, was enacted on November 4, 1998, following the approval of Proposition 1A by the voters of the State in the general election on November 3, 1998. SB 50 includes provisions for the following:

1. Issuance of State general obligation bonds in an amount not to exceed \$9.2 billion;
2. Reformation of the State School Building Program; and
3. Reformation of the School Fee mitigation payment collection procedure.

Additionally, Assembly Bill ("AB") 16, which Governor Davis signed on April 26, 2002, was enacted following the approval of Proposition 47 ("Prop 47") by the voters of the State in the general election on November 5, 2002. Prop 47 includes the authorization for issuance of State general obligation bonds in the amount of \$13.05 billion, and AB 16 provides for additional reformation of the State School Building Program into the School Facilities Program. On March 2, 2004, the voters of the State approved Proposition 55 ("Prop 55"). Prop 55 includes the authorization for the additional issuance of State general obligation bonds in the amount of \$12.3 billion. Finally AB 127, which Governor Schwarzenegger signed on May 20, 2006, was enacted following the approval of Proposition 1D ("Prop 1D") by the voters of the State in the general election of November 7, 2006. Prop 1D includes the authorization for the issuance of State general obligation bonds in the amount of \$10.4 billion. On November 8, 2016, the voters of the State approved Proposition 51 ("Prop 51"). Prop 51 includes the authorization for the issuance of State general obligation bonds in the amount of \$9 billion.

The Mira-Hart-Murrieta Decisions, which formerly permitted school districts to seek mitigation payments in excess of School Fees under certain circumstances, are suspended by AB 127. In lieu of the powers granted by the Mira-Hart-Murrieta Decisions, SB 50 and subsequent legislation provide school districts with an alternative School Fee collection procedure that, subject to certain conditions, authorizes school districts to collect Alternative Fees on residential developments. However, not all school districts will qualify to charge Alternative Fees.

Therefore, school districts must still rely on School Fees as a funding source for school facilities required by new development. However, before a school district can levy School Fees on new development, State law requires that certain nexus findings must be made and documented. The objective of this Study is to provide a rigorous basis for such findings.

## II. LEGISLATION

State legislation, specifically AB 2926 and AB 1600, provides guidelines, procedures, and restrictions on the levy of School Fees for school facilities. Certain provisions of this legislation and history are summarized below:

### A. AB 2926

AB 2926 was enacted by the State in 1986. Among other things, AB 2926 added various sections to the Government Code which authorize school districts to levy School Fees on new residential and commercial/industrial developments in order to pay for school facilities. In addition, AB 2926 provides for the following:

1. No city or county can issue a building permit for a development project unless such School Fees have been paid.
2. School Fees for commercial/industrial development must be supported by the finding that such School Fees "are reasonably related and limited to the needs for schools caused by the development."
3. School Fees for 1987 were limited to \$1.50 per square foot on new residential construction and \$0.25 per square foot for new commercial/industrial construction.
4. Every year, School Fees are subject to annual increases based on the Statewide cost index for Class B construction, as determined by the SAB at its January meeting (This provision was changed to every other year by AB181).

The provisions of AB 2926 have since been expanded and revised by AB 1600.

### B. AB 1600

AB 1600, which created Sections 66000 et seq. of the Government Code, was enacted by the State in 1987. AB 1600 requires that all public agencies satisfy the following requirements when establishing, increasing or imposing a fee as a condition of approval for a development project.

1. Determine the purpose of the fee.
2. Identify the facilities to which the fee will be put.

3. Determine that there is a reasonable relationship between the need for public facilities and the type of development on which a fee is imposed.
4. Determine that there is a reasonable relationship between the amount of the fee and the public facility or portion of the public facility attributable to the development on which the fee is imposed.
5. Provide an annual accounting of any portion of the fee remaining unexpended, whether committed or uncommitted, in the School District's accounts five or more years after it was collected.

In other words, AB 1600 limits the ability of a school district to levy School Fees unless (i) there is a need for the School Fee revenues generated and (ii) there is a nexus or relationship between the need for School Fee revenues and the type of development project on which the School Fee is imposed. (The requirements of AB 1600 were clarified with the passage in 2006 of AB 2751, which codifies the findings of *Shapell Industries vs. Milpitas Unified School District*.) The Study will provide information necessary to establish such a nexus between School Fees and residential development.

**C. AB 181**

AB 181, enacted by the State in 1989, made significant changes in several State Codes, including Sections 53080 et seq. of the Government Code which was re-codified as Sections 17620 et seq. of the Education Code on January 1, 1998. Changes in Section 53080 included additional requirements and procedures for imposing School Fees and other conditions on new development. Specifically, AB 181 imposes more stringent nexus requirements on school districts that wish to levy School Fees on CID, as follows:

1. In order to levy a School Fee on CID, a formal study must be conducted to determine the impact of "the increased number of employees anticipated to result" from new CID on the "cost of providing school facilities within the School District".
2. Only that portion of the School Fee justified by the "nexus findings" contained in this study may be levied. Nexus findings must be made on an individual project basis or on the basis of categories of CID and must "utilize employee generation estimates that are based on commercial/industrial factors within the school district."

Categories to be evaluated may include, but are not limited to, office, retail, transportation, communications and utilities, light industrial, heavy industrial, research and development, and warehouse uses.

- 3. Starting in 1990, maximum School Fees for residential and CID will be subject to increases every two (2) years rather than annually.
- 4. An appeals procedure shall be established whereby the levy of School Fees on a commercial/industrial project may be appealed to the governing board of a school district. Grounds for an appeal must include, but are not limited to, improper project classification by commercial/industrial category, or the application of improper or inaccurate employee or student generation factors to the project.

In summary, AB 181 establishes additional requirements which must be satisfied by school districts prior to their levying School Fees on CID.

### III. METHODOLOGY OF STUDY

Cooperative Strategies is projecting an increase in student enrollment attributable to new development in future years. This projected growth will create a demand for new school facilities to be constructed within the School District and the need to incur significant school facilities costs to meet that demand. As a result, the School District has determined that School Fees should be levied on new development projects. The objective of the Study is to provide a basis for such findings consistent with the requirements of AB 2926, AB 1600, AB 181, and the provisions of Section 66001 of the Government Code.

#### A. RESIDENTIAL METHODOLOGY

Cooperative Strategies has determined that School Fees must be levied on new residential projects, if findings can be made that such projects will lead to higher student enrollment and increased facilities costs. In order to evaluate the existence of a nexus, the Study identifies and analyzes the various connections or linkages between residential development and (i) the need for school facilities, (ii) the cost of school facilities, and (iii) the amount of School Fees that can justifiably be levied. The primary linkages identified include the following:

1. Housing projections - The number of future residential units to be constructed within the boundaries of the School District.
2. Student generation - The number of students generated from a residential unit within the School District.
3. Facility requirements - The number of new school facilities required to house students generated from new residential units.
4. School facilities cost impacts - The costs to the School District associated with the construction of new school facilities.
5. School Fee requirements – The School District's need to levy School Fees to cover the cost of new school facilities.

The above linkages result in a series of impacts which (i) connect new residential development with increased school facilities costs and (ii) connect School Fees per residential building square foot with increased facilities costs.

**B. COMMERCIAL/INDUSTRIAL METHODOLOGY**

Cooperative Strategies has also determined that School Fees must be levied on new CID projects. In order to determine the nexus relationships identified in AB 181, the Study analyzes the various linkages between CID and (i) the need for school facilities, (ii) the cost of school facilities, and (iii) the amount of the School Fee that can justifiably be levied. The primary connections or linkages include the following:

1. Job creation (i.e., new CID within the School District creates new jobs);
2. Household formation (i.e., job creation within the School District leads to the formation of new households in the School District);
3. Student generation (i.e., household formation within the School District generates new students);
4. Facilities requirements (i.e., student generation within the School District leads to the need to incur additional costs for new school facilities); and
5. School Fee requirements (i.e., additional costs for new school facilities within the School District leads to the need to levy School Fees for new development).

The above linkages result in a series of impacts which (i) connect new CID with increased school facilities costs and (ii) connect increased school facilities costs with School Fees on CID buildings. These impacts are identified for different CID land use categories, based on a "prototypical unit" of 1,000 square feet of new commercial or industrial floor space for each category. These "linkage impacts" include five (5) major types:

1. Employment Impacts
2. Household Impacts
3. Student Generation Impacts
4. School Facilities Cost Impacts
5. Fee Revenues

The nature and components of these impacts are summarized in Section III.C, along with the key assumptions and data sources used in estimating their magnitude.



Analysis of the first four (4) linkage impacts provides an estimate of the gross school facilities cost impacts per 1,000 square feet of floor space for each CID category. Analysis and comparison of all five (5) impacts provide an estimate of (i) net school facilities cost impacts (i.e., gross school facilities cost impacts minus residential revenues) per 1,000 square feet of CID floor space and (ii) the maximum commercial/industrial School Fee that can be justified.

**C. COMMERCIAL/INDUSTRIAL LAND USE CATEGORIES**

Linkage impacts are analyzed for the following CID land use categories:

- 1. Retail and Services
- 2. Office
- 3. Research and Development
- 4. Industrial/Warehouse/Manufacturing
- 5. Hospital
- 6. Hotel/Motel
- 7. Self-Storage

**RETAIL AND SERVICES**

The retail and services category includes commercial establishments which sell general merchandise, building materials, hard goods, apparel, and other items and services to consumers. Additional establishments in the retail and services category include nurseries, discount stores, restaurants, entertainment theme parks, new/used car sales facilities, service stations, supermarkets, banks, real estate sales offices, and similar uses.

**OFFICE**

A general office building houses one (1) or more tenants and is the location where affairs of a business, commercial or industrial organization, professional person or firm are conducted. The building or buildings may be limited to one (1) tenant, either the owner or lessee, or contain a mixture of tenants including professional services, insurance companies, investment brokers, company headquarters, and services for the tenants such as a bank or savings and loan, a restaurant or cafeteria, and service retail and services facilities. There may be large amounts of space used for file storage or data processing.

The office category may also include medical offices that provide diagnoses and outpatient care on a routine basis, but which are unable to provide prolonged in-house medical/surgical care. A medical office is generally operated by either a single private physician or a group of doctors.

**RESEARCH AND DEVELOPMENT**

Research and development facilities are those primarily associated with the application of scientific research to the development of high technology products. Areas of concentration include materials, science, computer, electronic, and telecommunications products. Facilities may also contain offices and fabrication areas. Activities performed range from pure research to product development, testing, assembly, and distribution.

**INDUSTRIAL/WAREHOUSE/MANUFACTURING**

Warehouses are facilities that are primarily devoted to the storage of materials. They may also include office and maintenance areas. This category also includes buildings in which a storage unit or vault is rented for the storage of goods.

Manufacturing facilities are building structures where the primary activity is the conversion of raw materials or parts into finished products. Size and type of activity may vary substantially from one facility to another. In addition to actual production of goods, manufacturing facilities generally have office, warehouse, research and associated functions. This category includes light industrial facilities such as printing plants, material testing laboratories, assemblers of data processing equipment, and power stations.

**HOSPITAL**

Hospital refers to any institution where medical or surgical care is given to non-ambulatory and ambulatory patients. The term does not however, refer to medical clinics (facilities that provide diagnoses and outpatient care only) or to nursing homes (facilities devoted to the care of persons unable to care for themselves).

**HOTEL/MOTEL**

Hotels and motels are commercial establishments primarily engaged in providing lodging, or lodging and meals, for the general public. As defined by Government Code Section 65995(d), the hotel/motel category includes, but is not limited to, any hotel, motel, inn, tourist home, or other lodging for which the maximum term of occupancy does not exceed 30 days.

It does not, however, include any residential hotel as defined by Section 50519(b)(1) of the Health and Safety Code.

**SELF-STORAGE**

This category includes buildings in which a storage unit or vault is rented for the storage of goods and/or personal materials. This category may also include office areas associated with storage.

Note that CID land use categories may include different industry types. For example, firms in the transportation, communications, or utilities industries may be classified in up to six (6) of the seven (7) land use categories shown above. Similarly, retail firms may also occupy office or industrial space (e.g., for corporate headquarters or warehousing) and manufacturing firms may occupy retail space (e.g., factory retail outlets). In evaluating any given project, the School District should assign the project to whichever CID category is the predominant use within the project.

## IV. FACILITIES CAPACITY AND STUDENT ENROLLMENT

In order to determine whether the School District's existing school facilities contain excess capacity to house students generated by new residential and CID development, school year 2021/2022 student enrollment and school facilities capacity of the School District were evaluated.

The School District's school facilities in school year 2021/2022 have a capacity of 5,445 student based on calculations by Cooperative Strategies for the School District's 2019 Facilities Master Plan, of which 2,748 are at the elementary school, 1,064 are at the middle school, and 1,633 are at the high school (see Exhibit A for an updated school facilities capacity calculation). Based on data provided by the School District, student enrollment is 5,114 in school year 2021/2022. As shown in Table 1 below, the School District's facilities capacity exceeds student enrollment at all school levels in school year 2021/2022

TABLE 1

### EXISTING SCHOOL FACILITIES CAPACITY AND STUDENT ENROLLMENT

School Level	2021/2022 Facilities Capacity	2021/2022 Student Enrollment	Excess/ (Shortage) Capacity
<b>Elementary School (Grades TK-5)</b>	2,748	2,696	52
<b>Middle School (Grades 6-8)</b>	1,064	833	231
<b>High School (Grades 9-12)</b>	1,633	1,585	48
<b>Total</b>	<b>5,445</b>	<b>5,114</b>	<b>331</b>

As indicated in Table 1, 52 elementary school seats, 231 middle school seats and 48 high school seats are available to house students generated from Future Units. These surplus seats will be addressed in Section V below.

## V. IMPACT OF RESIDENTIAL DEVELOPMENT ON SCHOOL FACILITIES NEEDS

As discussed in Section III, the objective of the Study is to determine the appropriateness of the imposition of a School Fee to finance school facilities necessitated by students to be generated from new residential development. Section III outlined the methodology which was employed in the Study to meet that objective. Section V is a step-by-step presentation of the results of the analysis.

### A. PROJECTED RESIDENTIAL DEVELOPMENT WITHIN THE SCHOOL DISTRICT

The initial step in developing a nexus as required by AB 2926 and AB 1600 is to determine the number of Future Units to be constructed within the School District's boundaries. Based on information provided by KCOG, the School District expects the construction of approximately 4,540 Future Units through calendar year 2035. Of these 4,540 Future Units, 3,405 are expected to be SFD units and 1,135 are expected to be MFA units. Table 2 distinguishes Future Units by land use.

TABLE 2  
FUTURE UNITS

Land Uses	Total Future Units
Single Family Detached	3,405
Multi-Family Attached	1,135
<b>Total Units</b>	<b>4,540</b>

### B. RECONSTRUCTION

Reconstruction is the act of replacing existing structures with new construction, which may have an alternative land use (i.e., commercial/industrial versus residential) or may consist of different residential unit types (i.e., SFD versus MFA, etc.).

#### B1. RESIDENTIAL RECONSTRUCTION

Residential Reconstruction consists of voluntarily demolishing existing residential units and replacing them with new residential development.

To the extent Reconstruction increases the residential square footage beyond what was demolished ("New Square Footage"), the increase in square footage is subject to the applicable School Fee as such construction is considered new residential development. As for the amount of square footage constructed that replaces only the previously constructed square footage ("Replacement Square Footage"), the determination of the applicable fee, if any, is subject to a showing that the Replacement Square Footage results in an increase in student enrollment and, therefore, an additional impact being placed on the School District to provide school facilities for new student enrollment.

Prior to the imposition of fees on Replacement Square Footage, the School District shall undertake an analysis on any future proposed projects(s) to examine the extent to which an increase in enrollment can be expected from Replacement Square Footage due to any differential in SGFs as identified in the Study for the applicable unit types between existing square footage and Replacement Square Footage. Any such fee that is calculated for the Replacement Square Footage shall not exceed the School Fee that is in effect at such time.

**B2. RECONSTRUCTION OF COMMERCIAL/INDUSTRIAL CONSTRUCTION INTO RESIDENTIAL CONSTRUCTION**

The voluntary demolition of existing commercial/industrial buildings and replacement of them with new residential development is a different category of Reconstruction. Cooperative Strategies is aware that such types of Reconstruction may occur within the School District in the future, however, Cooperative Strategies was unable to find information (i) about the amount planned within the School District in the future or (ii) historical levels, which might indicate the amount to be expected in the future. Due to the lack of information, the School District has decided to evaluate the impacts of Commercial/Industrial Reconstruction projects on a case-by-case basis and will make a determination of whether a fee credit is justified based on the nature of the project.

**C. STUDENT GENERATION FACTORS PER RESIDENTIAL UNIT**

In order to analyze the impact on the School District’s student enrollment from Future Units, Cooperative Strategies calculated SGFs for SFD and MFA units. The process of determining SGFs involved cross-referencing the School District’s enrollment data against the County Assessors residential data.

Sorting and extracting the County Assessors records by land use, Cooperative Strategies developed a database of 9,417 SFD units. This database was then compared with the School District's student enrollment database to identify address matches. Upon comparison of the two (2) databases, 2,984 student matches were found, resulting in the SGFs shown in Table 3.

**T A B L E 3**  
**STUDENT GENERATION FACTORS FOR SINGLE FAMILY DETACHED UNITS**

School Level	Students Matched	Single Family Detached Units	Student Generation Factors
Elementary School	1,354	9,417	0.1438
Middle School	728	9,417	0.0773
High School	902	9,417	0.0958
<b>Total</b>	<b>2,984</b>	<b>N/A</b>	<b>0.3169</b>

A procedure identical to the one used in calculating the SGFs for SFD units was used to determine SGFs for MFA units. A total of 724 students matched to the MFA database which consisted of 5,721 units. The resulting SGFs for MFA units are shown in Table 4 below.

**T A B L E 4**  
**STUDENT GENERATION FACTORS FOR MUTLI-FAMILY ATTACHED UNITS**

School Level	Students Matched	Multi-Family Attached Units	Student Generation Factors
Elementary School	331	5,723	0.0578
Middle School	140	5,723	0.0245
High School	124	5,723	0.0217
<b>Total</b>	<b>595</b>	<b>N/A</b>	<b>0.1040</b>

However, due to incomplete and incorrect address information in both the student enrollment and residential databases, Cooperative Strategies was unable to match all of the School District's students. The results are SGFs that understate the number of students generated by SFD and MFA units.

After accounting for incoming interdistrict students that reside outside of the School District's boundaries and students residing on China Lake Naval Base, there were 449 unmatched students. Therefore, Cooperative Strategies adjusted the SGFs listed in Tables 3 and 4 based on a rate which considers the number of students successfully matched to a school level and land use. The adjusted SGFs for each land use by school level are shown in Table 5.

T A B L E 5

**ADJUSTED STUDENT GENERATION FACTORS**

School Levels	Single Family Detached Units	Multi-Family Attached Units
Elementary School	0.1585	0.0638
Middle School	0.0853	0.0269
High School	0.1069	0.0243
<b>Total</b>	<b>0.3507</b>	<b>0.1150</b>

**D. SCHOOL DISTRICT FACILITIES REQUIREMENTS**

By multiplying the Future Units as listed in Table 2 by the SGFs identified in Table 5, the Study determined the projected number of new students to be generated from Future Units. The Projected Student Enrollment by school level is shown in Table 6.

T A B L E 6

**PROJECTED STUDENT ENROLLMENT FROM FUTURE UNITS**

School Level	Projected Student Enrollment from Future SFD Units	Projected Student Enrollment from Future MFA Units	Projected Student Enrollment from Future Units
Elementary School	540	72	612
Middle School	290	31	321
High School	364	28	392
<b>Total</b>	<b>1,194</b>	<b>131</b>	<b>1,325</b>



As indicated in Section IV, 52 surplus elementary school seats, 231 surplus middle school seats and 48 surplus high school seats are available to accommodate the Projected Student Enrollment. Therefore, the Projected Unhoused Students are less than the Projected Student Enrollment at all school levels. Table 7 shows Projected Unhoused Students for the School District.

T A B L E 7

**PROJECTED UNHOUSED STUDENTS FROM FUTURE UNITS**

School Levels	Projected Students from Future Units	Surplus Seats	Projected Unhoused Students
Elementary School	612	52	560
Middle School	321	231	90
High School	392	48	344
<b>Total</b>	<b>1,325</b>	<b>331</b>	<b>994</b>

To determine the number of elementary school, middle school, and high school facilities necessary to adequately house the Projected Unhoused Students, Cooperative Strategies divided the Projected Unhoused Students by the estimated school facilities capacity at each school level, as provided by the School District. The additional school facilities requirements are identified in Table 8.

T A B L E 8

**ADDITIONAL SCHOOL FACILITIES FOR PROJECTED UNHOUSED STUDENTS**

School Levels	Projected Unhoused Students	Estimated Facility/Teaching Station Capacity	Additional Facilities/Teaching Stations Needed
Elementary School	560	450	1.2444
Middle School	90	27	3.3333
High School	344	27	12.7407

**E. SCHOOL DISTRICT FACILITIES COSTS**

School facilities cost estimates at the elementary school level were provided by the School District. The elementary school facilities costs represent the full cost of site development, construction, furniture and equipment, as well as technology. The cost of expanding the existing middle school and high school facilities by adding additional teaching stations is based on per-pupil grant amounts established by SB 50. It must be noted that the facilities costs are in 2022 dollars and do not include interest costs associated with debt incurred to finance the construction of facilities. The estimated facility construction costs by school level are shown in Table 9 while the costs for each component of the school facilities construction are listed in Exhibit C.

**T A B L E 9**  
**ESTIMATED SCHOOL FACILITIES COSTS (2022\$)**

<b>School Levels</b>	<b>Estimated Total Cost per Facility/ Teaching Station</b>
<b>Elementary School</b>	\$92,800,000
<b>Middle School</b>	\$852,174
<b>High School</b>	\$1,081,134

The costs in Table 9 do not include costs associated with Central Administrative and Support Facilities. As indicated in Table 7, Future Units will cause the enrollment of the School District to increase by approximately 994 students. In accordance with the Provisions of Chapter 341, Statutes of 1992, SB 1612, the SAB adopted a report on January 26, 1994, requiring approximately four (4) square feet of central administrative and support facilities for every student. Based on this report and the estimated cost per square foot to construct and furnish these types of facilities, the Study incorporates a Central Administrative and Support Facilities cost impact of \$800 per student.

**F. TOTAL SCHOOL FACILITIES COST IMPACTS**

To determine the total school facilities cost impacts caused by Future Units, Cooperative Strategies (i) multiplied the school facilities costs (Table 9) by the additional school facilities needed (Table 8) and (ii) multiplied the central administrative and support facilities costs per student (above paragraph) by the Projected Unhoused Students (Table 7). Table 10 illustrates the total school facilities cost impacts from future residential development.

T A B L E 1 0

**TOTAL SCHOOL FACILITIES COST IMPACTS FROM FUTURE UNITS (2022\$)**

School Levels	Cost Per Facility/ Teaching Station/Student	Facilities/ Teaching Stations Required/Students Generated	Total School Facilities Cost Impacts
<b>Elementary School</b>	\$92,800,000	1.2444	\$115,480,320
<b>Middle School</b>	\$852,174	3.3333	\$2,840,552
<b>High School</b>	\$1,081,134	12.7407	\$13,774,404
<b>Central Admin Impacts</b>	\$800	994	\$795,200
<b>Total</b>	<b>N/A</b>	<b>N/A</b>	<b>\$132,890,476</b>

**G. SCHOOL FACILITIES COST IMPACTS PER RESIDENTIAL UNIT**

To determine the total school facilities cost impacts per future residential unit, the total school facilities cost impacts listed above need to first be apportioned by land use based on the number of elementary school, middle school, and high school students to be generated from such land use. Table 11 on the following page shows total school facilities cost impacts by land use.

T A B L E 1 1  
**TOTAL SCHOOL FACILITIES COST IMPACTS BY LAND USE (2022\$)**

School Level	Single Family Detached Units	Multi-Family Attached Units	Total School Facilities Cost Impacts
Elementary School	\$102,265,339	\$13,662,981	\$115,928,320
Middle School	\$2,621,297	\$291,255	\$2,912,552
High School	\$13,028,557	\$1,021,047	\$14,049,604
<b>Total</b>	<b>\$117,915,193</b>	<b>\$14,975,283</b>	<b>\$132,890,476</b>

Total school facilities cost impacts for each land use were then divided by the number of Future Units in such land use to determine school facilities cost impacts per SFD unit and MFA unit. These impacts are shown in Table 12.

T A B L E 1 2  
**SCHOOL FACILITIES COST IMPACTS PER FUTURE UNIT (2022\$)**

Land Uses	Total School Facilities Cost Impacts	Future Units	School Facilities Cost Impacts per Residential Unit
Single Family Detached	\$117,915,193	3,405	\$34,630
Multi-Family Attached	\$14,975,283	1,135	\$13,194

**H. SCHOOL FACILITIES COST IMPACTS PER SQUARE FOOT**

To determine the school facilities cost impacts per square foot of residential construction for each land use, the school facilities cost impacts per unit listed in Table 12 were divided by the average square footage of such type of residential unit. Using square footage information for units constructed within the School District obtained ParcelQuest, Cooperative Strategies estimates that the average square footage of an SFD unit in the School District is projected to be 2,071 square feet while the average square footage of an MFA unit is projected to be 1,150 square feet. Table 13 shows the school facilities cost impacts per square foot of residential construction in the School District.

T A B L E 13

**SCHOOL FACILITIES COST IMPACTS PER RESIDENTIAL SQUARE FOOT (2022\$)**

<b>Land Uses</b>	<b>School Facilities Cost Impacts per Residential Unit</b>	<b>Average Square Footage</b>	<b>School Facilities Cost Impacts per Square Foot</b>
<b>Single Family Detached</b>	\$34,630	2,071	\$16.72
<b>Multi-Family Attached</b>	\$13,194	1,150	\$11.47

## VI. IMPACT OF COMMERCIAL/INDUSTRIAL DEVELOPMENT ON SCHOOL FACILITIES NEEDS

This section presents the quantitative findings of the commercial/industrial nexus analysis summarized in Section III. In particular, this section presents estimates of the following:

1. All "linkage impacts" discussed in Section III, by CID land use category.
2. Gross school facilities cost impacts per 1,000 square feet of commercial/industrial floor space.
3. Net school facilities cost impacts (i.e., gross school facility cost impacts minus residential revenues) per 1,000 square feet of commercial/industrial floor space.
4. The percentage of the maximum CID School Fee per square foot allowed by law that can be justified to pay for new school facilities.

### A. EMPLOYMENT IMPACTS

As indicated in Section III, employment impacts for different CID categories equal the estimated number of on-site employees generated per 1,000 square feet of commercial/industrial floor space, which are referred to in the Study as CID Land Use Categories. Consistent with the provisions of Section 17621(e)(1)(B) of the Education Code, employment impacts for each category are based on data from SANDAG. The employment impacts are shown in Table 14 on the following page.

T A B L E 1 4

**EMPLOYMENT IMPACTS PER 1,000 SQUARE FEET (2022\$)**

<b>CID Land Use Category</b>	<b>Square Feet per Employee</b>
<b>Retail and Services</b>	447
<b>Office</b>	286
<b>Research and Development</b>	329
<b>Industrial/Warehouse/Manufacturing</b>	371
<b>Hospital</b>	360
<b>Hotel/Motel</b>	883
<b>Self-Storage</b>	15,552

**B. HOUSEHOLD IMPACTS**

As noted in Section III, household impacts equal the estimated number of households associated with each category of employment impacts, per 1,000 square feet of commercial/industrial floor space. Household impacts include the following components:

1. Households per Employee

The average number of households per employee are calculated based on information obtained from the Census. Based on this information, the total household impacts are 0.9525 households per employee within the School District.

2. Employed Persons Living within the School District

In order to determine the number of employed persons who live within the School District, Cooperative Strategies utilized data from the Census. Based on this data, approximately 31.74 percent of the employed persons within the School District are estimated to live within the School District. This trend is expected to increase as new residential and CID projects are approved and additional homes and jobs are created within the School District.

3. Propensity to Occupy New Homes

The propensity to occupy new housing within the general area of the School District helps determine the number of employees generated from new homes. Based on data on recent resales and new home sales obtained from CoreLogic, new home sales in the School District were estimated to equal 10.53 percent of the total housing units which experienced occupant turnover between 2020 and 2021.

4. Total Household Impact

In order to determine the Total Household Impact of new residential units, the Study multiplied the average employed persons per household, employed person living within the School District, and the propensity to occupy new homes. This helps determine the number of new employees coming to live and work within the School District produced by new residential development, as shown in Table 15.

T A B L E 1 5

**TOTAL HOUSEHOLD IMPACTS FROM NEW CID**

Household Impact	Factor
<b>Households per Employees</b>	0.9525
<b>Employees Living within the School Districts</b>	31.74%
<b>Households with Employees Working within the School District</b>	<b>0.3023</b>
<b>Propensity to Occupy New Homes</b>	10.53%
<b>Total Household Impacts</b>	<b>0.0318</b>

**C. STUDENT GENERATION IMPACTS**

As noted in Section III, student generation impacts equal the number of the School District's students associated with each category of CID space. Separate student generation impacts are estimated for each CID category and school level.



**1. RESIDENTIAL STUDENT GENERATION IMPACTS**

In order to analyze household formation as a result of new CID, the SGFs shown in Table 5 must be blended. To blend the SGFs of the two (2) land uses into a single SGF for each school level, the land uses were weighted in proportion to each type's percentage of the future residential units to be constructed within the School District. Applying these weighting factors yields the following blended SGFs shown in Table 16.

T A B L E 1 6

**BLENDED STUDENT GENERATION FACTORS**

School Level	Student Generation Factors
Elementary School	0.1348
Middle School	0.0707
High School	0.0863

**2. TOTAL STUDENT GENERATION IMPACTS**

Multiplying total household impacts shown in Table 15 by the blended SGFs shown in Table 16 results in the average student generation impacts. These average student generation impacts are shown by school level in Table 17.

T A B L E 1 7

**AVERAGE STUDENT GENERATION IMPACTS**

School Level	Student Generation Factors	Total Household Impacts	Average Student Generation Impacts
Elementary School	0.1348	0.0318	0.0043
Middle School	0.0707	0.0318	0.0022
High School	0.0863	0.0318	0.0027

**D. INTER-DISTRICT TRANSFER IMPACTS**

The Study also evaluates the impact of students attending the School District on an inter-district transfer basis. The inter-district transfer rate is determined by calculating the ratio of student transfers into the School District's schools by the number of persons employed within its boundaries. Based on information provided by the School District, total student transfers into the School District's schools for school year 2021/2022 total 230 at the elementary school level, 48 at the middle school level, and 10 at the high school level. Employment within the School District's area is estimated at 33,827 persons based on employment estimates provided by Corelogic. Table 18 shows the inter-district transfer impacts by school level.

T A B L E 1 8

**INTER-DISTRICT TRANSFER IMPACTS**

School Level	Inter-District Transfer Impacts
Elementary School	0.0068
Middle School	0.0014
High School	0.0003

**E. TOTAL STUDENT GENERATION IMPACT**

To determine the total student generation impacts of CID on the School District, the average student generation impacts from Table 17 are added to the inter-district transfer impacts from Table 18. The resulting total student generation impacts are displayed in Table 19.

T A B L E 1 9

**TOTAL STUDENT GENERATION IMPACTS**

School Level	Average Student Generation Impacts	Inter-District Transfer Impacts	Total Student Generation Impacts
Elementary School	0.0043	0.0068	0.0111
Middle School	0.0022	0.0014	0.0036
High School	0.0027	0.0003	0.0030

**F. GROSS SCHOOL FACILITIES COST IMPACTS**

As noted in Section III, school facilities cost impacts equal the gross school facilities cost impacts (exclusive of residential revenues) associated with the total student generation impact of each CID category.

**1. SCHOOL FACILITIES COSTS PER STUDENT**

The school facilities costs per student are the average cost impact produced by students generated from Future Units. This impact estimate is derived from the school facilities costs (Table 11) divided by the Projected Student Enrollment from Future Units (Table 7) by school level. Multiplying the total student generation impacts by the school facilities costs per student results in the gross school facilities cost impacts shown in Table 20.

T A B L E 2 0

**GROSS SCHOOL FACILITIES COSTS IMPACTS PER HOUSEHOLD (2022\$)**

School Level	Total Student Generation Impacts	Cost per Student	Gross School Facilities Costs Impacts per Household
Elementary School	0.0111	\$189,425	\$2,102.62
Middle School	0.0036	\$9,073	\$32.66
High School	0.0030	\$35,841	\$107.52
<b>Total</b>	<b>N/A</b>	<b>N/A</b>	<b>\$2,242.80</b>

**G. FEE REVENUES**

As noted in Section III, fee revenues include two (2) components: residential revenues and potential CID School Fee revenues.

**1. RESIDENTIAL REVENUES AND NET SCHOOL FACILITY COSTS**

Residential revenues equal the maximum revenues from residential development associated with each school level. These revenues are derived from the School District's proposed School Fee of \$4.79 per square foot multiplied by the School District's weighted average square footage for residential units of 1,841 square feet. Based on this calculation, the residential revenues per unit in the School District are estimated to be \$8,818. Multiplying the total household impact shown in Table 15 by residential revenues results in the residential revenues per student shown in Table 21.

T A B L E 2 1

**RESIDENTIAL REVENUES PER HOUSEHOLD (2022\$)**

Item	Amount
<b>Revenue per Residential Unit</b>	\$8,818
<b>Total Household Impact</b>	0.0318
<b>Residential Revenue per Household</b>	<b>\$280.41</b>

**2. NET SCHOOL FACILITIES COST IMPACTS**

In order to calculate the net school facilities cost impacts per grade level, the residential revenues shown in Table 21 were subtracted from the gross school facilities cost impacts shown in Table 20. The results are the net school facilities cost impacts that must be funded by CID School Fees, as shown in Table 22.

T A B L E 2 2

**NET SCHOOL FACILITIES COST IMPACTS  
PER HOUSEHOLD (2022\$)**

Item	Amount
<b>Gross School Facilities Cost Impacts per Household</b>	\$2,242.80
<b>Residential Revenue per Household</b>	\$280.41
<b>Net School Facilities Cost Impacts per Household</b>	<b>\$1,962.39</b>

**H. JUSTIFICATION OF COMMERCIAL/INDUSTRIAL SCHOOL FEES**

Dividing net school facilities cost impacts shown in Table 22 by total the square feet per employee for each land use category, as shown in Table 14, results in the CID impacts shown in Table 23.

T A B L E 2 3

**SCHOOL FACILITIES COST IMPACTS PER SQUARE FOOT (2022\$)**

<b>CID Land Use Category</b>	<b>Net Impact per Household</b>	<b>Square Feet per Employee</b>	<b>Cost Impact per Square Foot Of CID</b>
<b>Retail and Services</b>	\$1,962.39	447	\$4.390
<b>Office</b>	\$1,962.39	286	\$6.862
<b>Research and Development</b>	\$1,962.39	329	\$5.965
<b>Industrial/Warehouse/Manufacturing</b>	\$1,962.39	371	\$5.289
<b>Hospital</b>	\$1,962.39	360	\$5.451
<b>Hotel/Motel</b>	\$1,962.39	883	\$2.222
<b>Self-Storage</b>	\$1,962.39	15,552	\$0.126

# VII. CONCLUSION

On February 23, 2022, the SAB increased the maximum Residential and CID School Fees authorized by Section 17620 of the Education Code from \$4.08 to \$4.79 per residential building square foot, and from \$0.66 to \$0.78 per CID square foot for unified school districts.

This section summarizes the findings of the Study for new residential and commercial/industrial construction within the School District. In particular, this section summarizes the following:

## 1. RESIDENTIAL FEES

As shown in Table 13, the impact per residential square foot exceeds the maximum residential School Fee of \$4.79 per square foot and, therefore, School Fees would provide for less than 100 percent of the school facilities cost impacts. The Study concludes that the School District is fully justified in levying the maximum residential School Fee of \$4.79 per square foot for all new residential development within its boundaries, subject to the limitations under the law.

Based on this information, the School District is justified in charging the Statutory Fee Amounts per square foot shown in Table 24 on new residential construction:

T A B L E 2 4

**MAXIMUM JUSTIFIED STATUTORY RESIDENTIAL FEE PER SQUARE FOOT (2022\$)**

Item	Residential Fee per Square Foot
Single Family Detached	\$4.79
Multifamily Attached	\$4.79

**2. COMMERCIAL/INDUSTRIAL FEES**

As shown in Table 23, the impact per CID square foot exceeds the maximum CID School Fee of \$0.78 per square foot for all CID land use categories, except for Self-Storage. The Study concludes that the School District is fully justified in levying the maximum CID School Fee of \$0.78 per square foot for all CID land use categories, except for self-storage, where it is justified in levying \$0.126 per square foot of CID development.

Based on this information, the School District is justified in charging the Statutory Fee Amounts per square foot shown in Table 25 on new CID construction:

T A B L E 2 5  
**MAXIMUM JUSTIFIED STATUTORY CID FEE  
PER SQUARE FOOT (2022\$)**

CID Land Use Category	CID Fee per Square Foot
<b>Retail and Services</b>	\$0.78
<b>Office</b>	\$0.78
<b>Research and Development</b>	\$0.78
<b>Industrial/Warehouse/Manufacturing</b>	\$0.78
<b>Hospital</b>	\$0.78
<b>Hotel/Motel</b>	\$0.78
<b>Self-Storage</b>	\$0.126

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**EXHIBIT A**  
UPDATED SCHOOL FACILITIES CAPACITY  
CALCULATION



## Sierra Sands Unified School District

### School Facilities Capacity Calculation

<b>Item</b>	<b>Elementary School</b>	<b>Middle School</b>	<b>High School</b>
Feller Elementary School	560		
Gateway Elementary School	448		
Inyokern Elementary School	224		
Las Flores Elementary School	532		
Pierce Elementary School	420		
Richmond Elementary School	564		
Monroe Middle School		514	
Murray Middle School		550	
Burroughs High School			1,633
<b>N/A</b>	<b>2,748</b>	<b>1,064</b>	<b>1,633</b>