
**DEVELOPMENT FEE JUSTIFICATION STUDY/
SCHOOL FACILITIES NEEDS ANALYSIS**

Prepared for

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SECTION A

INTRODUCTION AND FINDINGS

INTRODUCTION

School districts are authorized to collect fees on new residential and commercial/industrial development in accordance with Education Code Section 17620 and Government Code Section 65995. The traditional development fees (referred to as “Level 1” fees) are currently capped at \$4.08 per square foot for residential development and \$0.66 per square foot for commercial/industrial development.

For many districts, the maximum Level 1 residential fee amount is inadequate to fully fund the needed facilities. Pursuant to Government Code Sections 65995.5, 65995.6, and 65995.7, which became effective November 4, 1998, districts can charge alternative fees (referred to as “Level 2” and “Level 3” fees) that exceed the Level 1 maximum fee of \$4.08 per square foot. The Level 2 fee is intended to provide up to one-half the cost of providing school facilities for students from new development, with state funding under the Leroy F. Greene School Facilities Act of 1998 providing the other one-half. The Level 3 fee, which is intended to fully fund the cost of school facilities, is only applicable if state funds for new facility construction are not available.¹

To be eligible to impose Level 2 or Level 3 fees, Government Code Section 65995.5(b) states that a school district must satisfy three separate requirements.

- (1) The district must make timely application to and be determined to be eligible by the State Allocation Board for new school facility construction funding.
- (2) The district must satisfy at least two of four alternative conditions set forth in Government Code Section 65995.5 (b)(3). The four alternative conditions are:
 - (a) the district has substantial enrollment on a multi-track year-round schedule;
 - (b) the district has placed a local general obligation bond measure for school facilities on the ballot in the last four years that received at least 50 percent plus one vote;
 - (c) the district has issued debt or incurred obligations for capital outlay in an amount equivalent to 15 percent of its local bonding capacity; or in an amount equivalent to 30 percent of such local bonding capacity, if special taxes levied pursuant to Chapter 2.5 (commencing with Section 53311) of Division 2 of Title 5, approved by a vote of landowners after November 4, 1998, are included in the repayment of indebtedness;
 - (d) at least 20 percent of the district’s teaching stations are relocatable classrooms.

¹ Pursuant to Government Code Section 65995.7(a), state funds are considered not available if the State Allocation Board is no longer approving apportionments for new construction pursuant to Article 5 (commencing with Section 17072.20) of Chapter 12.5 of Part 10 of the Education Code due to a lack of funds available for new construction.

- (3) The district must conduct and adopt a school facilities needs analysis pursuant to Government Code Section 65995.6. The needs analysis identifies school facilities needs and determines the Level 2 fee using a prescribed methodology. Because the Level 2 methodology requires use of state standard allowances for site size and construction costs, the resulting Level 2 fee is typically conservative, but may still provide more funding for the district than the capped Level 1 fee.

Requirement 1, above, is met because the District has been determined to be eligible by the State Allocation Board for new school facility construction funding and has applied for such funding. Requirement 2 has been met because the District meets the local bonding capacity requirement and because at least 20 percent of the District's teaching stations are relocatable classrooms. Requirement 3 is will be met through the preparation and adoption of this report.

FINDINGS

This Development Fee Justification Study/School Facilities Needs Analysis provides the information and analysis necessary to demonstrate that the Elk Grove Unified School District is justified in collecting Level 1 fees on new residential and commercial/industrial development (\$4.08 and \$0.66 per square foot, respectively), and a Level 2 fee of \$6.34 per square foot for residential development.

In order to charge development fees, Section 66001 of the Government Code requires that the District determine that there is a reasonable relationship or nexus between:

- the fee's use and the type of development project on which the fee is imposed;
- the need for the public facility and the type of development project on which the fee is imposed; and
- the amount of the fee and the cost of the public facility or portion of the public facility attributable to the development on which the fee is imposed.

As required by Government Code Section 66001, this study demonstrates the following:

a. New residential and commercial/industrial development relates directly to the need for school facilities in the District.

- Based upon past development activity, adopted land use plans and approved development projects, an additional 9,400 single family units, 750 multiple family units and approximately 2.21 million square feet of commercial/industrial development will be constructed in the District during the next five years (see Section B, Step 1 and Appendix C-1).
- Students will be generated by new residential and commercial/industrial development. Single family residential development generates an average of .7001 grades TK-12 students per unit (see Section B, Step 2). Multiple family units generate an average of .4088 grades TK-12 students. Commercial and industrial development generates between .056 and .255 TK-12 students per 1,000 square feet, depending on category of development (see Section C, Table C-1).

- New development is expected to generate approximately 6,887 additional students in the District during the next five years, including 3,641 in grades TK-6, 1,039 in grades 7-8, 1,922 in grades 9-12, 39 SDC Non-severe students and 246 SDC Severe students (see Section B, Step 2).
- b. The District needs additional school facilities to accommodate students from new development.**
- The District currently lacks facilities capacity to adequately house existing students in grades TK-6, 7-8, 9-12 and SDC Severe (see Section B, Step 3).
 - The District will need additional school facilities to house the following number of students generated by new development during the next five years: 3,641 in grades TK-6, 1,039 in grades 7-8, 1,922 in grades 9-12, and 246 SDC Severe students (see Section B, Step 4).
- c. The amount of the fees charged is reasonably related to the need attributable to new development projects.**
- Section B justifies a Level 2 Fee of \$6.34 per square foot and a Level 3 Fee of \$12.69 per square foot. The Level 2 and Level 3 fees are intended to provide 50% and 100% of the cost of providing school facilities for students from new development, respectively, using prescribed state cost allowances. Therefore, the fees are reasonably related to the cost of facilities attributable to new development projects. However, the specific and limited methodology for the calculation of Level 2 and 3 fees may not reflect the full cost to the District for providing facilities for students from new development.
 - The residential fee per square foot justified by this report to fund the cost of providing school facilities to students from new development, based on 100% of state allowable costs, is \$12.68 per square foot (see Section B, Step 8). The maximum allowable Level 1 residential fee (\$4.08 per square foot) falls substantially short of funding the full cost of providing school facilities to students from new development.
 - A fee on commercial and industrial development may be charged as a supplement to the residential fee if the residential fee does not cover the cost of providing school facilities to students from new development. The justifiable fees for commercial and industrial development by category are presented in Table C-1, which shows that the maximum commercial/industrial fee of \$0.66 per square foot can be justified in all categories.

SECTION B

RESIDENTIAL FEE JUSTIFICATION

INTRODUCTION

This section presents a step-by-step calculation of the school facilities fees that can be justified for new residential development in the District. To facilitate concurrent evaluation of Level 1 and Level 2 fees, the more restrictive Level 2 fee methodology is used in accordance with the requirements of Government Code Sections 65995.5 and 65995.6. The Level 3 fee is also calculated pursuant to Government Code Section 65995.7.

STEP 1: FIVE-YEAR PROJECTION OF RESIDENTIAL UNITS

The first step in the analysis is to project the number of residential units to be constructed in the District during the next five years. As a first step in this process, it is appropriate to evaluate District development activity in the recent past and to consider local agency plans and projections for residential development activity.

Residential development activity in the District between January 1, 2015, and December 31, 2019, based on developer fee records, is shown below on Table 1-1.

TABLE 1-1
Elk Grove Unified School District
RESIDENTIAL DEVELOPMENT 2015-2019

Year	Single Family Units	Multiple Family Units	Condominium Units	Total Residential Units
2015	1,067	270	0	1,337
2016	994	112	0	1,106
2017	782	365	0	1,147
2018	1,062	0	0	1,062
2019	1,514	96	0	1,610
Total	5,419	843	0	6,262
Average	1,084	169	0	1,252

Source: Elk Grove Unified School District (Developer Fee Records), 2015-2019

Table 1-1 indicates that developer fees were paid for 5,419 single family units in the District during the past five years. The number of units ranged from a high of 1,514 in 2019 to a low of 782 in 2017. The five-year average was 1,084 single family units per year.

The number of multiple family units during the past five years ranged from a high of 365 units in 2017 to a low of zero units in 2018. The annual average for the past five years was 169 units.

Table 1-1 indicates that no developer fees were paid for condominium units during the past five years.

The Sacramento County 2030 General Plan was adopted by the Sacramento County Board of Supervisors on November 9, 2011. The County currently has adequate residential holding capacity to meet its housing needs through 2030. Approximately 60% of this existing holding capacity is in

the Elk Grove Unified School District. The 2030 General Plan includes a growth management strategy, a strong focus on addressing existing communities and revitalizing aging commercial corridors, an Economic Development Element, and strategies to reduce greenhouse gas emissions consistent with state law.

The City of Elk Grove adopted its new General Plan in February 2019. The new General Plan estimates a population increase of approximately 160,000. All expected growth in the current and proposed City of Elk Grove General Plan is within the boundaries of EGUSD. The City of Sacramento’s 2030 General Plan, adopted in March 2009, anticipates very little growth in the EGUSD portion of its boundaries. The City of Rancho Cordova General Plan, adopted in June 2006, anticipates thousands of additional residential units in new growth areas of the Sunrise Douglas Community Plan area.

Projections for residential development during the next five years are presented in Table 1-2. Table 1-2 projects that approximately 9,400 single family units, 750 multiple family units and no condominium units will be constructed during the next five years. The projections take into consideration current housing market conditions in the District, adopted land use plans and approved development projects.

**TABLE 1-2
Elk Grove Unified School District
PROJECTED RESIDENTIAL DEVELOPMENT**

Year	Single Family Units	Multiple Family Units	Condominium Units	Total Residential Units
2020-21	1,600	150	0	1,750
2021-22	1,800	150	0	1,950
2022-23	2,000	150	0	2,150
2023-24	2,000	150	0	2,150
2024-25	2,000	150	0	2,150
Total	9,400	750	0	10,150

Source: Elk Grove Unified School District, 2020 (Appendix B-1)

**STEP 2: PROJECT NUMBER OF STUDENTS GENERATED
BY NEW RESIDENTIAL UNITS**

The number of students generated by residential units constructed during the next five years is projected by multiplying the student generation rates for new residential development in the District by the number of units projected in Step 1. The student generation rates for new residential units in the District are shown in Table 2-1. No generation rates are provided for condominium units since no condominium development is projected during the next five years. The methodology used by the District to determine the student generation rates is detailed in Appendix B-2.

**TABLE 2-1
Elk Grove Unified School District
STUDENT GENERATION RATES**

Grade Level	Single Family Units	Multi-Family Units
Elementary (TK-6)	0.3846	0.2572
Middle School (7-8)	0.1093	0.0710
High School (9-12)	0.2063	0.0806
Total (TK-12)	0.7001	0.4088

Source: Elk Grove Unified School District (Appendix B-2), 2020

Table 2-2 shows the projected number of students generated by residential units constructed during the next five years. As indicated by the table, a total of 3,808 elementary school students, 1,080 middle school students and 1,999 high school students are projected to be generated by residential units projected to be constructed during the next five years.

**TABLE 2-2
Elk Grove Unified School District
STUDENTS GENERATED BY RESIDENTIAL UNITS
CONSTRUCTED DURING THE NEXT FIVE YEARS**

Grade Level	Number of Units	Student Generation Rate	New Development Students
<i>Single Family Development</i>			
TK-6	9,400	0.3846	3,615
7-8	9,400	0.1093	1,027
9-12	9,400	0.2063	1,939
<i>Multiple Family Development</i>			
TK-6	750	0.2572	193
7-8	750	0.0710	53
9-12	750	0.0806	60
<i>Total Students From New Development</i>			
TK-6			3,808
7-8			1,080
9-12			1,999

Source: Elk Grove Unified School District (Development Projections & Student Generation Rates), 2020

The number of students generated in Table 2-2 is adjusted in Table 2-3 to account for the number of Special Day Class (SDC) students that would be generated by new development. Based upon the existing percentage of SDC students in each grade grouping, Table 2-3 estimates the number of SDC students generated by new development (39 Non-severe and 246 Severe) and subtracts them from the number of students projected in Table 2-2. The net number of students generated by new development, less SDC students, would be 3,641 in grades TK-6, 1,039 in grades 7-8 and 1,922 in grades 9-12.

**TABLE 2-3
Elk Grove Unified School District
SDC STUDENTS GENERATED BY NEW RESIDENTIAL UNITS
(FIVE YEARS)**

Grade Level	Students Projected in Table 2-2	SDC Percentage		SDC Students		Table 2-2 Students Less SDC
		Non-severe	Severe	Non-Severe	Severe	
TK-6	3,808	0.48%	3.92%	18	149	3,641
7-8	1,080	0.68%	3.14%	7	34	1,039
9-12	1,999	0.68%	3.14%	14	63	1,922
Total SDC				39	246	

Source: Elk Grove Unified School District, 2020; Odell Planning & Research, Inc., 2020

STEP 3: DETERMINE EXCESS FACILITIES CAPACITY

Based on the information on the District’s most recent Capacity Baseline Adjustment Worksheet, the District’s existing school building capacity is 26,564 for grades TK-6, 9,547 for grades 7-8, 18,893 for grades 9-12, 975 for SDC Non-severe students and 351 for SDC Severe students. The total capacity is inclusive of projects at all grade levels that have been approved for apportionment by the State Allocation Board but have not yet completed construction.

Section 65995.6(b)(2) of the Government Code requires that the analysis “identify and consider the extent to which projected enrollment growth may be accommodated by excess capacity in existing facilities.” To determine whether there is any excess capacity to house new development students, Table 3-1 compares the 2019-20 enrollment in each grade grouping to the existing school building capacity. As shown by Table 3-1, facilities capacity exists to accommodate 614 SDC Non-severe students; however, the District currently needs capacity for 6,027 students in grades TK-6, 573 students in grades 7-8, 1,185 students in grades 9-12 and 1,874 SDC Severe students.

**TABLE 3-1
Elk Grove Unified School District
EXCESS FACILITIES CAPACITY (OR CAPACITY NEEDED)**

Grade Level	Facilities Capacity	2019-20 Enrollment	Excess Capacity (or Capacity Needed)
TK-6	26,564	32,591	None (6,027)
7-8	9,547	10,120	None (573)
9-12	18,839	20,078	None (1,185)
SDC Non-severe	975	361	614
SDC Severe	351	2,225	None (1,874)

Source: Elk Grove Unified School District, 2020

STEP 4: DETERMINE NUMBER OF UNHOUSED STUDENTS GENERATED BY NEW DEVELOPMENT

The number of unhoused students from new development for the next five years is determined in Table 4-1 by subtracting any available capacity in Table 3-1 from the number of students generated by new development. Since there is no capacity available in grades TK-6, 7-8, 9-12 and SDC Severe, all of the students projected from new development in grades TK-6, 7-8, 9-12 and SDC Severe will be unhoused. However, Table 4-1 shows that there is excess capacity for 614 SDC Non-severe students. Therefore, no SDC Non-severe students generated by new development would be unhoused.

**TABLE 4-1
Elk Grove Unified School District
UNHOUSED STUDENTS GENERATED BY NEW DEVELOPMENT**

Grade Level	New Development Students	Excess Capacity	Unhoused Students
TK-6	3,641	0	3,641
7-8	1,039	0	1,039
9-12	1,922	0	1,922
SDC Non-severe	39	614	0
SDC Severe	246	0	246

Source: Odell Planning & Research, 2018; Elk Grove Unified School District, 2020

STEP 5: CALCULATE ALLOWABLE SCHOOL FACILITIES COSTS

School facilities costs are broken down into three categories: building construction, site acquisition and site development. The allowable District cost of school building construction for unhoused students from new development is calculated by multiplying the number of new development students needing facilities by the per student cost allowances specified in Education Code Section 17072.10(a), as annually adjusted by the State Allocation Board. The allowances used in this report include the adjusted additional grants for automatic fire detection and sprinkler systems.

As indicated by Table 5-1, the total allowable District building construction cost for unhoused students generated by new development during the next five years is \$101,661,142.

TABLE 5-1
Elk Grove Unified School District
ALLOWABLE BUILDING CONSTRUCTION COST FOR UNHOUSED
NEW DEVELOPMENT STUDENTS

Grade Level	Unhoused Students	Cost Per Student	Allowable Cost
TK-6	3,641	\$12,675	\$46,149,675
7-8	1,039	\$13,437	\$13,961,043
9-12	1,922	\$17,048	\$32,766,256
SDC Non-severe	0	\$23,885	\$0
SDC Severe	246	\$35,708	\$8,784,168
Total			\$101,661,142

Source: Odell Planning & Research, Inc., 2020; State Allocation Board, January 2020.

Government Code Section 65995.5(c)(1) allows site acquisition and development costs to be added to the building construction cost for new development students. According to Section 65995.5(h), site acquisition costs “shall not exceed half of the amount determined by multiplying the land acreage determined to be necessary under the guidelines of the State Department of Education, as published in the ‘School Site Analysis and Development Handbook,’ as that handbook read as of January 1, 1998, by the estimated cost determined pursuant to Section 17072.12 of the Education Code. Site development costs shall not exceed the estimated amount that would be funded by the State Allocation Board pursuant to its regulations governing grants for site development costs.”

Site acquisition costs are estimated by the District, as follows: \$3,359,429 for an elementary school site and \$25,531,659 for a combined middle school and high school site (see Appendix B-3). (Future middle and high schools will be constructed on combined sites). One-half of these respective amounts, divided by a typical capacity of 850 for an elementary school, 1,200 for a middle school and 2,200 for a high school (3,400 total for secondary grades), equals an allowable District cost per student for site acquisition of \$1,976 per elementary school student and \$3,755 per middle and high school student. Site acquisition costs for SDC students were calculated based on a weighted average between elementary and secondary costs based on the projected proportion of SDC students in the elementary and secondary grades.

Table 5-2 indicates that the total allowable site acquisition cost to accommodate projected students from new development is \$18,986,179.

**TABLE 5-2
Elk Grove Unified School District
ALLOWABLE SITE ACQUISITION COST FOR UNHOUSED
NEW DEVELOPMENT STUDENTS**

Grade Level	Unhoused Students	Cost Per Student	Allowable Cost
TK-6	3,641	\$1,976	\$7,194,616
7-8	1,039	\$3,755	\$3,901,445
9-12	1,922	\$3,755	\$7,217,110
SDC Non-severe	0	\$2,992	\$0
SDC Severe	246	\$2,738	\$673,548
Total			\$18,986,179

Source: Elk Grove Unified School District (Appendix B-3), 2020; Odell Planning & Research, Inc., 2020

Allowable site development costs include service site, offsite, utilities and general site costs. One-half the estimated service site, offsite, and utilities costs are allowable. Allowable general site amounts are based on a per acre grant amount plus a percent of the base student construction grant amount (see Appendix B-4 for details). The per student amounts in Table 5-3 are the sum of the service site, offsite, utilities, and general site amounts. Table 5-3 indicates that the total allowable site development cost to accommodate projected students from new development is \$24,409,306.

**TABLE 5-3
Elk Grove Unified School District
ALLOWABLE SITE DEVELOPMENT COST FOR UNHOUSED
NEW DEVELOPMENT STUDENTS**

Grade Level	Unhoused Students	Cost Per Student	Allowable Cost
TK-6	3,641	\$3,731	\$13,584,571
7-8	1,039	\$3,463	\$3,598,057
9-12	1,922	\$3,301	\$6,344,522
SDC Non-severe	0	\$3,532	\$0
SDC Severe	246	\$3,586	\$882,156
Total			\$24,409,306

Source: Elk Grove Unified School District (Appendix B-4), 2020; Odell Planning & Research, Inc., 2020

The total allowable school facilities costs to accommodate students generated by new development during the next five years are shown on Table 5-4. The total costs were determined to be \$145,057,167.

TABLE 5-4
Elk Grove Unified School District
TOTAL ALLOWABLE SCHOOL FACILITIES COSTS
FOR UNHOUSED NEW DEVELOPMENT STUDENTS

Type of Cost	Allowable Costs
Building Construction	\$101,661,142
Site Acquisition	\$18,986,719
Site Development	\$24,409,306
Total	\$145,057,167

A list of the District’s planned school facilities projects, for which developer fees will be expended, is included in Appendix B-5.

STEP 6: DETERMINE DEDICATED LOCAL FUNDS

Pursuant to Section 69995.5(c)(2), the full amount of any local funds dedicated to school facilities necessitated by students from new development must be subtracted from the cost determined in Step 5. The District has the following possible sources of local funding:

Reimbursements: There have been instances when the District received reimbursement money for infrastructure development not funded by the State School Building Program but reimbursed by the County of Sacramento or utility companies. Any reimbursements have been accounted for in the site development costs used in this analysis.

Redevelopment Pass-Throughs: The District’s RDA income for the 2019-20 fiscal year as of January 6, 2020, was \$118,584.

Excess Tax Proceeds: Excess tax proceeds refer to special tax dollars collected above the cost of the debt service owed on bonds. The District has not yet received any excess tax proceeds for the 2019-20 fiscal year, but the District’s estimate for the 2019-20 fiscal year is \$1,537,420. Excess tax revenue will be expended on operational costs, staff, to pay claims against the special tax district and to fund school projects.

School Fees: The District collects \$0.61 per square foot in statutory school fees for commercial and industrial development and \$5.94 per square foot for residential construction. In 2019, fees were collected on 548,622 square feet of non-exempt commercial/industrial development, which amounted to \$334,659. As of January 6, 2018, the District had \$40,411,150 in its developer fee fund. These funds are not available to provide facilities to students generated by new development over the next five years because the funds are necessary to provide adequate facilities for students from prior development. The cost to provide facilities for existing unhoused students is approximately \$226.6 million (see Table 6-1).

Mello-Roos Special Tax: Because of funding deficiencies associated with state funds and developer fees, the District, in 1987, implemented a Mello-Roos Special Tax. On March 10, 1998, the voters approved an additional \$205 million of bond authorization. Mello-Roos funds are intended to provide an alternate source of funds to mitigate the late arrival of state funds, offset state funding shortfalls, finance facilities needs that are not funded by the state building program or developer

fees, and to provide funding for modernization, deferred maintenance related projects, core facility additions, non-growth related improvements, technology and student support services. Mello-Roos funds, therefore, are not considered by the District to be available to supplement the developer fee.

Measure M: In November 2016, voters residing within EGUSD voted to pass a general obligation bond (Measure M). Measure M will provide EGUSD students and the community with \$476 million to fund critical improvements to existing school buildings and grounds. Currently, there are no plans to use Measure M funds for the construction of facilities needed to accommodate new students generated from newly constructed homes.

As shown in Step 3, the District currently lacks capacity for 6,027 students in grades TK-6, 573 students in grades 7-8, 1,185 students in grades 9-12 and 1,874 SDC Severe students. The cost to house these students from existing development is presented in Table 6-1 and is based upon the allowable per student costs for building construction, site acquisition and site development shown in Tables 5-1, 5-2 and 5-3.

TABLE 6-1
Elk Grove Unified School District
COST TO PROVIDE FACILITIES FOR EXISTING UNHOUSED STUDENTS

Grade Level	Number of Students	Cost Per Student	Total Cost
<i>Building Construction Cost</i>			
TK-6	6,027	\$12,675	\$76,392,225
7-8	573	\$13,437	\$7,699,401
9-12	1,185	\$17,048	\$20,201,880
SDC Non-severe	0	\$23,885	\$0
SDC Severe	1,874	\$35,708	\$66,916,792
<i>Site Acquisition Cost</i>			
TK-6	4,327	\$1,976	\$8,550,152
7-8	573	\$3,755	\$2,151,615
9-12	1,185	\$3,755	\$4,449,675
SDC Non-severe	0	\$2,992	\$0
SDC Severe	1,874	\$2,738	\$5,131,012
<i>Site Development Cost</i>			
TK-6	6,027	\$3,713	\$22,486,737
7-8	573	\$3,463	\$1,984,299
9-12	1,185	\$3,301	\$3,911,685
SDC Non-severe	0	\$3,532	\$0
SDC Severe	1,874	\$3,586	\$6,720,164
<i>Total Cost</i>			
TK-6			\$107,429,114
7-8			\$11,835,315
9-12			\$28,563,240
SDC Non-severe			\$0
SDC Severe			\$78,767,968
Total			\$226,595,637

Source: Elk Grove Unified School District, 2020; Odell Planning & Research, Inc., 2020.

The District owns two future elementary school sites purchased using previously collected developer fees. Because these sites can provide capacity for 1,700 students when constructed (850 x 2), the number of existing unhoused TK-6 students for the purpose of calculating site acquisition cost in Table 6-1 has been reduced to 4,327 students (6,027 – 1,700).

By comparing the potentially available local funds for new construction with the cost of providing school facilities for unhoused students from existing development in Table 6-1, it is evident that all possible local funds for new construction would be exhausted providing school facilities for unhoused students from existing development. Therefore, no local funding will be available to provide facilities for projected unhoused students from new development.

STEP 7: CALCULATE LEVEL 2 FEE

In accordance with Section 65995.5(c)(3) of the Government Code, the District’s justifiable Level 2 fee is calculated by dividing the allowable school facilities costs for new development students determined in Step 5 by the projected total square footage of assessable space of residential units anticipated to be constructed during the next five years. The total square footage for residential units projected to be constructed in the District is presented in Table 7-1. This was determined by multiplying the respective average square footage of single family and multiple family units developed in the District during the past three years (see Appendix B-6) by the projected number of units determined in Step 1.

**TABLE 7-1
Elk Grove Unified School District
PROJECTED RESIDENTIAL SQUARE FOOTAGE
(FIVE-YEAR PERIOD)**

Number/Type of Units	Square Footage Per Unit	Total Square Footage Constructed
9,400 Single Family	2,352	22,108,800
750 Multiple Family	1,010	757,500
Total		22,866,300

Source: Elk Grove Unified School District (Developer Fee Records); Odell Planning & Research, Inc., 2020

Table 7-2 calculates the Level 2 fee by dividing the allowable school facilities costs for projected students generated by new development (Step 5) by the projected residential square footage determined in Table 7-1. The resulting Level 2 residential fee is \$6.34 per square foot.

**TABLE 7-2
Elk Grove Unified School District
LEVEL 2 FEE**

Allowable Costs For New Development Students	Projected Residential Square Footage	Cost Per Square Foot (Level 2 Fee)
\$145,057,167	22,866,300	\$6.34

Source: Odell Planning & Research, Inc., 2020

STEP 8: DETERMINE LEVEL 3 AND LEVEL 1 FEES

For the Level 3 fee, Government Code Section 65995.7(a) provides that if state funds for new facility construction are not available, a district that complies with Section 65995.5 may increase the alternative fee by an amount not to exceed the amount determined previously in Step 7. In other words, if state funding is not available, the Level 2 fee may be effectively doubled to cover the full state-allowed cost of facilities. Therefore, the Level 3 fee is calculated in Table 8-1 by dividing the full state-allowed facilities costs by the projected residential square footage.

**TABLE 8-1
Elk Grove Unified School District
LEVEL 3 FEE**

100% State Facilities Costs For New Development Students	Projected Residential Square Footage	Cost Per Square Foot (Level 3 Fee)
\$290,114,334	22,866,300	\$12.69

Source: Odell Planning & Research, Inc., 2020

As indicated in the previous steps, the Level 2 fee was determined using 50 percent of the state allowed cost to provide facilities for students from new development. The Level 1 fee, however, is calculated using full facilities costs, but is capped at \$4.08 per square foot. As shown in Table 8-1, if 100 percent of the state-allowed facilities costs are used to calculate the fee, a fee of \$12.6; per square foot would result. This amount far exceeds the current cap of \$4.08 per square foot; however, \$4.08 is the highest Level 1 fee that can currently be charged by the District.

SECTION C

COMMERCIAL/INDUSTRIAL FEE JUSTIFICATION

INTRODUCTION

This section presents a step-by-step explanation of the methodology used to determine the District's commercial/industrial development fees, as shown in Table C-1. The maximum commercial/industrial fee that can be charged pursuant to Education Code Section 17620 and Government Code Section 65995 is \$0.66 per square foot.

STEP 1: DETERMINE SQUARE FOOTAGE PER EMPLOYEE

Commercial and industrial development generates employees, and the children of employees living in the District will need to be housed in District schools. The number of employees per 1,000 square feet generated by various types of commercial and industrial development is shown in Table C-1.¹

STEP 2: DETERMINE NUMBER OF STUDENTS PER EMPLOYEE

The average number of students per employee was determined by using 2018 U.S. Census Bureau American Community Survey (ACS) data for the Elk Grove Unified School District and 2018 CBEDS enrollment information from the California Department of Education (CDE) DataQuest web site. According to ACS data, there were 151,024 civilian employed persons residing in the District. The CDE web site indicates that 63,917 students were enrolled in grades TK-12 in the District in 2018-19. This is a ratio of 0.423 students per employee. This ratio, however, has been adjusted by including only the estimated percentage of employees that would move into the District as a result of employment opportunities (16.9 percent).² The discounted student per employee ratio, therefore, is 0.071 (16.9 percent of 0.423).

STEP 3: CALCULATE STUDENT GENERATION RATE PER 1,000 SQUARE FEET

The student generation rate per 1,000 square feet of commercial/industrial development in each category was calculated by multiplying the number of employees per 1,000 square feet by the number of students per employee. (The numbers are presented per 1,000 square feet rather than per square foot for ease of presentation and data manipulation.)

STEP 4: DETERMINE SCHOOL FACILITIES COST PER STUDENT

The average cost of school facilities per student is \$42,365 and was determined by dividing the cost of providing facilities for new development students determined in Section B, Table 8-1 (\$290,114,334) by the 6,848 new development students needing facilities (unhoused students in Section B, Table 4-1).

¹ Based upon Sacramento Area Council of Governments employee yield data (1995).

² Based on 2018 U.S. Census Bureau American Community Survey data.

TABLE C-1
Elk Grove Unified School District
COMMERCIAL/INDUSTRIAL FEE CALCULATION

Category	Employees Per 1,000 Sq. Ft.	Students Per Employee	TK-12 Students Per 1,000 Sq. Ft.	Facilities Cost Per Student	Cost Per Square Foot	Residential Offset	Net Cost Per Sq. Ft. (Justifiable Fee)
Warehousing	0.787	0.071	0.056	\$42,365	\$2.37	\$1.17	\$1.20
Hotel & Motel	1.181	0.071	0.084	\$42,365	\$3.55	\$1.76	\$1.79
Industrial	1.312	0.071	0.093	\$42,365	\$3.95	\$1.95	\$1.99
Community Shopping Center	1.469	0.071	0.104	\$42,365	\$4.42	\$2.19	\$2.23
Research & Development	1.771	0.071	0.126	\$42,365	\$5.33	\$2.64	\$2.69
Commercial Strip	1.837	0.071	0.130	\$42,365	\$5.53	\$2.73	\$2.79
Auto Dealer	2.020	0.071	0.143	\$42,365	\$6.08	\$3.01	\$3.07
Neighborhood Shopping Center	2.296	0.071	0.163	\$42,365	\$6.91	\$3.42	\$3.49
Regional Shopping Center	2.755	0.071	0.196	\$42,365	\$8.29	\$4.10	\$4.19
Financial Institution	2.831	0.071	0.201	\$42,365	\$8.52	\$4.21	\$4.30
Medical Office	2.908	0.071	0.206	\$42,365	\$8.75	\$4.33	\$4.42
Commercial Office	3.597	0.071	0.255	\$42,365	\$10.82	\$5.35	\$5.47

Note: Distribution of cost per square foot between the residential offset and the net cost per square foot may not sum precisely due to rounding.
Source: Sacramento Area Council of Governments, 1995; U.S. Census Bureau American Community Survey, 2018; Odell Planning & Research, Inc., 2020

STEP 5: CALCULATE COST PER SQUARE FOOT

The school facilities cost per square foot for each commercial/industrial category was calculated by multiplying the student generation rate per 1,000 square feet by the average school facilities cost per student, and then dividing the product by 1,000.

STEP 6: CALCULATE RESIDENTIAL OFFSET

When employees are generated in the District as a result of new commercial/industrial development, fees will also be charged on the new residential units occupied by the employees and students generated by commercial/industrial development. To prevent a commercial or industrial development from paying for the portion of the impact that will be covered by the residential fee, this amount has been calculated and deducted from each category. This is referred to as the “residential offset” and is intended to avoid any possibility of overpayment for the same student impact. The residential offset amount is calculated by multiplying the following factors together and dividing the total by 1,000 (to convert from cost per 1,000 square feet to cost per square foot):

- The student generation rate per 1,000 square feet of commercial/industrial development.
- The number of dwelling units constructed for each student. This is 1.47, which is derived by taking the weighted average student generation rate for projected single family and multiple family residential development (0.6786) and dividing it into one.
- The average square feet per dwelling unit (2,249 sq. ft.). This is the weighted average square footage of projected single family, multiple family and condominium units, assuming that 93 percent of future units will be single family and 7 percent will be multiple family (see Table 7-1).
- The maximum residential fee that could be charged by the District (\$6.34 per square foot).

STEP 7: DETERMINE NET COST PER SQUARE FOOT (JUSTIFIABLE FEE)

After subtracting the residential offset, the net justifiable fee for all categories of commercial/industrial development in Table C-1 exceeds the maximum statutory fee of \$0.66 per square foot in all categories. Therefore, the District is justified in charging \$0.66 per square foot for all categories of commercial/industrial development.

APPENDIX B-1

PROJECTED NEW RESIDENTIAL UNITS DURING THE NEXT FIVE YEARS

Elk Grove Unified School District
Residential Units With the Potential to Develop Within Five Years

Year	New Homes Projected			
	Single-Family	Condominiums	Apartments	All Housing Types
2020-21	1,600	0	150	1,750
2021-22	1,800	0	150	1,950
2022-23	2,000	0	150	2,150
2023-24	2,000	0	150	2,150
2024-25	2,000	0	150	2,150
Five Year Total	9,400	0	750	10,150

APPENDIX B-2

STUDENT GENERATION RATE STUDY PRODEDURE AND RATES

2019-20 STUDENT GENERATION RATE STUDY PROCEDURE

The Elk Grove Unified School District's Student Generation Rate (SGR) study was done in four steps.

1 Determination of areas to be analyzed based upon age of housing

By law, in order for homes to be included in a school district's SGR study, they must have been constructed and occupied within the previous five years. In the past, Elk Grove Unified School District has designated three types of housing units: single-family homes, apartments and condominiums; however, for 2019-20 there were no eligible condominium complexes, so the analysis only includes single-family and apartment homes. Twenty single family subdivisions in our district met the guidelines and were used in the single-family housing study. Four apartment complexes met the criteria to be used for the multi-family housing study.

2 Determination of the number of owner occupied homes in the single family subdivisions

After the single-family study areas were selected, the total lots were counted within each of those areas. County assessor data and ArcGIS software were used to determine a precise count of each of the areas. Tax records for each individual parcel were researched to determine if it was owner occupied. All lots still owned by a development company were eliminated.

3 Determination of the number of students residing within those areas

The ArcGIS program was utilized to count the number of students within each of the selected study areas.

4 Calculation of the Student Generation Rates

The SGR's were calculated by dividing the total number of students by the number of occupied homes within each study area. For each of the apartment complexes, the total number of occupied apartments was divided by the total number of students residing in the complex. For both housing categories, the SGR was broken down into three grade levels: elementary (K-6), middle (7-8), and high (9-12).

**Elk Grove Unified School District
Student Generation Rates
(2019-20 CBEDS Residing Students)**

Single Family - Detached			
<i>Grade</i>	<i>Students By Individual Grade</i>	<i>Students By Grade Level</i>	<i>Student Yield Factor</i>
TK	41		0.0107
K	196		0.0512
1	233		0.0609
2	229		0.0599
3	198		0.0518
4	191		0.0499
5	199		0.0520
6	184		0.0481
K-6		1,471	0.3846
7	206		0.0539
8	212		0.0554
7-8		418	0.1093
9	216		0.0565
10	207		0.0541
11	191		0.0499
12	175		0.0458
9-12		789	0.2063
Total	2,678	2,678	0.7001
Units			3,825

Multi Family - Apartments			
<i>Grade</i>	<i>Students By Individual Grade</i>	<i>Students By Grade Level</i>	<i>Student Yield Factor</i>
TK	3		0.0058
K	22		0.0422
1	16		0.0307
2	22		0.0422
3	21		0.0403
4	20		0.0384
5	18		0.0345
6	12		0.0230
K-6		134	0.2572
7	23		0.0441
8	14		0.0269
7-8		37	0.0710
9	9		0.0173
10	17		0.0326
11	9		0.0173
12	7		0.0134
9-12		42	0.0806
Total	210	213	0.4088
Units			521

APPENDIX B-3
SITE ACQUISITION COSTS

Elk Grove Unified School District Site Acquisition Costs

2020 School Facilities Needs Analysis/Fee Justification Study
(Based Upon a 2017 Appraisal of a Typical Elementary School Site)

Elementary School Site	Cost per Acre	Acquisition Cost	Escrow/Other (4%)	Total
10 acre elementary school site	\$323,022	\$3,230,220	\$129,209	\$3,359,429

Secondary School Site (Combined Middle/High School)	Cost per Acre	Acquisition Cost	Escrow/Other (4%)	Total
76 Acre High School/Middle School Site	\$323,022	\$24,549,672	\$981,987	\$25,531,659

APPENDIX B-4

SITE DEVELOPMENT COSTS

Elk Grove Unified School District

October 2019

Elementary School Site Development Costs

Site Development Category	Cost (\$)
Service Site Development	\$3,490,804
Off-Site Development	\$719,252
Utility Services	\$457,297
TOTAL	\$4,667,353

Based upon the actual site development costs for the new Franklin Elementary school, which is currently under construction in the City of Elk Grove

Secondary School Site Development Costs

Site Development Category	Cost (\$)
Service Site Development	\$9,659,156
Off-Site Development	\$3,800,167
Utility Services	\$1,637,105
TOTAL	\$15,096,428

Based upon Cosumnes Oaks High School/Elizabeth Pinkerton Middle School, which are the most recently constructed secondary schools. Costs have been escalated to 2019 values based upon the Bureau of Labor Statistics Consumer Price Index.

General Site Acreage Allowance

	Acres	Grant/Acre	Total	Grant/Student
Elementary (K-6) Site	10	\$20,266	\$202,660	\$238
Middle & High School (Grades 7-12)	76	\$20,266	\$1,540,216	\$453

General Site Per Student Grant

	Percent	Base Grant	Per Student
Elementary (K-6)	6%	\$12,451	\$747
Middle (7-8)	6%	\$13,169	\$790
High School (9-12)	3.75%	\$16,756	\$628

Total Site Development Per Student

	Site Development	General Site	Total
Elementary (K-6)	\$2,746	\$985	\$3,731
Middle (7-8)	\$2,220	\$1,243	\$3,463
High School (9-12)	\$2,220	\$1,081	\$3,301
SDC Non-Severe*			\$3,532
SDC Severe*			\$3,586

**Weighted average of K-6 and 7-12 costs based on existing percentage of SDC student in K-6 and 7-12
Sources: Elk Grove Unified, 2020; Odell Planning and Research, Inc., 2020; State Allocation Board, 2020*

APPENDIX B-5

PLANNED NEW SCHOOL FACILITIES AND OTHER SCHOOL PROJECTS

FUTURE SCHOOL FACILITIES

(As of 2020)

The following schools and other facilities have the potential for initial planning or construction within the next five years. For planning purposes, schools are designed well in advance of projected need in order to provide maximum flexibility for changing development within given regions or areas. For elementary schools, a minimum of two to three years for planning and construction is required prior to opening a new school. For high school/middle schools, a minimum of five to six years is required. Future student projections and funding availability may change the following: 1) the order in which schools are built; 2) the year in which school are built; and/or, 3) the number of schools built in any given year. Some projects may be dependent on the passage of future local and/or State bonds.

Elementary Schools

"Crooked Creek Estates Elementary"

"Florin Vineyard GAP Quadrant #1 Elementary"

"Laguna Ridge South Elementary"

"Sunridge Park Elementary"

"Vineyard Point Elementary"

High School and Middle Schools

Vineyard Area Middle School/High School

Sunrise Douglas Area Middle School/High School

Other Projects

Jesse Baker School Addition

Student Support Center Addition

Various Classroom Modifications/Additions to Accommodate Growth

APPENDIX B-6

AVERAGE RESIDENTIAL UNIT SQUARE FOOTAGE

Elk Grove Unified School District Average Square Footage Report
by Calendar Year

<i>Year</i>	<i>Month</i>	<i>Total S.F. Units</i>	<i>Total Apt. Units</i>	<i>Total Condo Units</i>	<i>Total Senior Units (SF & Apt)</i>	<i>Total S.F. Sq. Ft.</i>	<i>Total M.F. Sq. Ft.</i>	<i>Total Condo Sq. Ft.</i>	<i>Total Senior Sq. Ft.</i>	<i>Avg S.F. Sq. Ft.</i>	<i>Avg Apt. Sq. Ft.</i>	<i>Avg Condo Sq. Ft.</i>	<i>Avg Senior Sq. Ft. (SF & Apt)</i>
2017	January	64	0	0	0	163,883	0	0	0	2,561	N/A	N/A	N/A
	February	40	0	0	5	82,689	0	0	9,969	2,067	N/A	N/A	1,994
	March	58	0	0	0	149,060	0	0	0	2,570	N/A	N/A	N/A
	April	76	84	0	5	166,721	85,608	0	10,131	2,194	1,019	N/A	2,026
	May	71	0	0	4	159,424	0	0	7,979	2,245	N/A	N/A	1,995
	June	65	0	0	4	128,387	0	0	8,172	1,975	N/A	N/A	2,043
	July	43	114	0	4	91,573	125,331	0	7,844	2,130	1,099	N/A	1,961
	August	72	0	0	4	157,513	0	0	8,091	2,188	N/A	N/A	2,023
	September	80	55	0	20	180,048	57,247	0	39,602	2,251	1,041	N/A	1,980
	October	55	0	0	0	146,009	0	0	0	2,655	N/A	N/A	N/A
	November	65	0	0	0	160,822	0	0	0	2,474	N/A	N/A	N/A
	December	101	112	0	4	245,564	109,620	0	7,516	2,431	979	N/A	1,879
	2017 Total	790	365	0	50	1,831,693	377,806	0	99,304	2,319	1,035	0	1,986

<i>Year</i>	<i>Month</i>	<i>Total S.F. Units</i>	<i>Total Apt. Units</i>	<i>Total Condo Units</i>	<i>Total Senior Units (SF & Apt)</i>	<i>Total S.F. Sq. Ft.</i>	<i>Total M.F. Sq. Ft.</i>	<i>Total Condo Sq. Ft.</i>	<i>Total Senior Sq. Ft.</i>	<i>Avg S.F. Sq. Ft.</i>	<i>Avg Apt. Sq. Ft.</i>	<i>Avg Condo Sq. Ft.</i>	<i>Avg Senior Sq. Ft. (SF & Apt)</i>
2018	January	68	0	0	0	178,902	0	0	0	2,631	N/A	N/A	N/A
	February	49	0	0	4	121,625	0	0	7,844	2,482	N/A	N/A	1,961
	March	70	0	0	4	186,025	0	0	7,597	2,658	N/A	N/A	N/A
	April	69	0	0	8	180,372	0	0	15,553	2,614	N/A	N/A	1,944
	May	139	0	0	5	310,395	0	0	10,050	2,233	N/A	N/A	2,010
	June	119	0	0	25	294,084	0	0	62,225	2,471	N/A	N/A	2,489
	July	118	0	0	10	268,138	0	0	19,502	2,272	N/A	N/A	1,950
	August	90	0	0	12	243,020	0	0	23,204	2,700	N/A	N/A	1,934
	September	58	0	0	0	135,365	0	0	0	2,334	N/A	N/A	N/A
	October	87	0	0	0	222,578	0	0	0	2,558	N/A	N/A	N/A
	November	97	0	0	0	231,742	0	0	0	2,389	N/A	N/A	N/A
	December	104	0	0	4	249,960	0	0	8,172	2,403	N/A	N/A	2,043
	2018 Total	1,068	0	0	72	2,622,206	0	0	154,147	2,455	N/A	0	2,141

Elk Grove Unified School District Average Square Footage Report
by Calendar Year

<i>Year</i>	<i>Month</i>	<i>Total S.F. Units</i>	<i>Total Apt. Units</i>	<i>Total Condo Units</i>	<i>Total Senior Units (SF & Apt)</i>	<i>Total S.F. Sq. Ft.</i>	<i>Total M.F. Sq. Ft.</i>	<i>Total Condo Sq. Ft.</i>	<i>Total Senior Sq. Ft.</i>	<i>Avg S.F. Sq. Ft.</i>	<i>Avg Apt. Sq. Ft.</i>	<i>Avg Condo Sq. Ft.</i>	<i>Avg Senior Sq. Ft. (SF & Apt)</i>
2019	January	57	0	0	8	126,310	0	0	16,016	2,216	N/A	N/A	2,002
	February	69	0	0	0	162,216	0	0	0	2,351	N/A	N/A	N/A
	March	135	0	0	0	299,262	0	0	0	2,217	N/A	N/A	N/A
	April	304	0	0	0	705,849	0	0	0	2,322	N/A	N/A	N/A
	May	148	0	0	16	344,061	0	0	21,800	2,325	N/A	N/A	1,363
	June	140	0	0	8	329,402	0	0	16,016	2,353	N/A	N/A	2,002
	July	91	0	0	4	214,401	0	0	8,307	2,356	N/A	N/A	2,077
	August	134	0	0	0	302,878	0	0	0	2,260	N/A	N/A	N/A
	September	122	0	0	9	258,549	0	0	18,056	2,119	N/A	N/A	2,006
	October	89	0	0	4	195,091	0	0	8,307	2,192	N/A	N/A	2,077
	November	143	0	0	7	356,117	0	0	14,026	2,490	N/A	N/A	2,004
	December	82	96	0	5	181,788	87,912	0	9,749	2,217	916	N/A	1,950
	2019 Total	1,514	96	0	61	3,475,924	87,912	0	112,277	2,296	916	0	1,841

APPENDIX C-1

COMMERCIAL/INDUSTRIAL DEVELOPMENT PROJECTION

APPENDIX C-1

COMMERCIAL/INDUSTRIAL DEVELOPMENT PROJECTION

Chargeable commercial/industrial development in the District from January 1, 2015 to December 31, 2019 is shown below on Table C-1A.

**TABLE C-1A
Elk Grove Unified School District
CHARGEABLE COMMERCIAL/INDUSTRIAL DEVELOPMENT 2015-2019**

Year	Commercial/Industrial Building Square Footage
2015	434,072
2016	602,197
2017	172,003
2018	455,045
2019	548,622
Total	2,211,939
Average	442,388

Source: Elk Grove Unified School District Developer Fee Records

Table C-1A indicates that developer fees were paid for 2,211,939 square feet of commercial/industrial development during the past five years, ranging from a high of 602,197 square feet in 2016 to a low of 172,003 square feet in 2017. The annual average for the past five years was 442,388 square feet. The average of the past five years in Table C-1A is considered a reasonable projection for near-term future development. Based on this average, approximately 2.21 million square feet of commercial/industrial development is projected in the District during the next five years.