



SCHOOL FEE JUSTIFICATION STUDY

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PREPARED FOR:

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EXECUTIVE SUMMARY

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

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

The State Allocation Board (“SAB”) reviews and may adjust the maximum authorized School Fees every January in even-numbered years. The SAB increased the Level I fees on February 23, 2022 and the maximum School Fees authorized by Education Code Section 17620 are currently \$4.79 per square foot for residential construction/reconstruction and \$0.78 per square foot for commercial/industrial construction. The School District currently collects Level I school fees in the amount of \$4.08 per square foot for residential construction/reconstruction and up to \$0.66 per square foot for commercial/industrial construction. The levy of such Level I school fees were justified by the findings presented in the Developer Fee Justification and Impact Analysis prepared for the School District and dated June 2020 (“2020 Fee Study”). Based on the findings presented in this Study, the School District is justified in collecting Level I school fees at an amount equal to the maximum authorized School Fees of \$4.79 per square foot for residential construction/reconstruction and \$0.78 per square foot for categories of commercial/industrial development. The findings are summarized below:

RESIDENTIAL DEVELOPMENT

New residential development in the School District is projected over the next ten (10) years. Based on School District-wide student generation rates and the projected development of residential dwelling units within the School District, such development could generate an estimated 2,359 new students over the next ten (10) years. The school facilities cost impact per residential square foot attributable to students generated from new residential construction as determined in this Study is shown in the following table. The cost impacts per square foot shown in Table E-1 exceeds the current maximum authorized residential School Fee of \$4.79, therefore, the School District is reasonably justified in levying the Level I school fees in an amount up to but not exceeding \$4.79 per square for residential development (“Applicable Residential School Fee”).

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

IMPACT PER SQUARE FOOT	MAXIMUM APPLICABLE SCHOOL FEE PER SQUARE FOOT
\$5.87	\$4.79

COMMERCIAL/INDUSTRIAL DEVELOPMENT

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

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

TABLE E-2
COMMERCIAL/INDUSTRIAL SCHOOL FACILITIES COST IMPACTS/APPLICABLE SCHOOL FEES

COMMERCIAL/INDUSTRIAL CATEGORY	IMPACT PER SQUARE FOOT	MAXIMUM APPLICABLE SCHOOL FEE PER SQUARE FOOT
Banks	\$7.64	\$0.78
Community Shopping Center	\$4.16	\$0.78
Neighborhood Shopping Center	\$7.57	\$0.78
Industrial Business Parks	\$9.51	\$0.78
Industrial Parks/ Warehousing/ Manufacturing	\$3.65	\$0.78
Rental Self-Storage	\$0.18	\$0.18
Research & Development	\$8.23	\$0.78
Hospitality (Lodging)	\$3.06	\$0.78
Commercial Offices (Standard)	\$12.96	\$0.78
Commercial Offices (Large High Rise)	\$12.30	\$0.78
Corporate Offices	\$7.26	\$0.78
Medical Offices	\$11.53	\$0.78

SECTION I. INTRODUCTION

A. PURPOSE OF THE STUDY

The purpose of this Study is to determine if a reasonable relationship exists between new residential and commercial/industrial development and the School District's need for the construction and/or reconstruction of school facilities. The findings presented in this Study have been made pursuant to and in compliance with Education Code Section 17620 and Government Code Section 66001 *et seq.* and serve as a basis for determining such a relationship.

B. GENERAL DESCRIPTION OF THE SCHOOL DISTRICT

The School District serves portions of the Cities of Rialto, San Bernardino, Colton, and Fontana. Additionally, the School District covers unincorporated areas of the County of San Bernardino ("County") and educates a total student population of approximately 24,083 transitional kindergarten (TK) through continuation high school students. The School District currently operates nineteen (19) elementary schools, five (5) middle schools, three (3) comprehensive high schools, one (1) continuation high school, and one (1) alternative school.

SECTION II. LEGISLATION AND LEGAL REQUIREMENTS

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

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

AB 1600 was enacted by the State legislature in 1987 and created Government Code Sections 66000 *et seq.* These sections require a public agency to satisfy the 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 use to which the fee is to be put;
3. Determine how there is a reasonable relationship between the fee’s use and the type of development project on which the fee is imposed;
4. Determine that there is a reasonable relationship between the need for the public facilities and the type of development project on which the fee is imposed;
5. Determine that there is a reasonable relationship between the amount of the fee and the cost, or portion of the cost of the public facility attributable to the development on which the fee is imposed; and
6. Provide an annual accounting of any portion of the fee remaining unspent or held for projects for more than five (5) years after collection.

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

In 1998, Governor Wilson signed into law Senate Bill 50 (“SB 50”), the Leroy F. Greene School Facilities Act of 1998, which reformed State’s School Building Program and developer school fee legislation. A significant provision of SB 50 provides school districts the option of adopting alternative school fees (also known as Level II and Level III fees) in excess of the Level I fee

upon meeting certain requirements. SB 50 also placed a \$9.2 billion State Bond measure on the November 3, 1998 ballot (Proposition 1A). With the passage of Proposition 1A in November 1998, SB 50 became operative.

SB 50 also limited the power of cities and counties to require mitigation of school facilities impacts as a condition of approving new development and suspended the court cases known as Mira-Hart-Murrieta. The Mira-Hart-Murrieta cases previously permitted school districts to collect mitigation fees in excess of school fees under certain circumstances.

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

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

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

Furthermore, effective January 1, 2022, AB 602 amended certain standards and procedures relevant to “impact fee nexus studies” prepared by local agencies. As of the current date, school impact fee justification studies are included within the requirements of AB 602. AB 602 added Government Code section 66016.5 to the code to require, among other items, that “when applicable, the nexus study “shall identify the existing level of service for each public facility, identify the proposed new level of service, and include an explanation of why the new level of service is appropriate.”

“Level of service” is not a commonly applied measure of the suitability or condition of school programs and buildings in California. Like all school districts, the School District follows California state standards related to public education and is mandated to serve all children that live within their boundaries and choose to attend, regardless of age or circumstance. District are charged with ensuring that sound and safe facilities are ready and available to accommodate all children when needed and often without advance notice.

State-imposed minimum requirements for school facilities are contained in Title 5 of the California Code of Regulations. The information contained in this Study is based upon all of the foregoing concepts and standards, as further informed by local school board policy, preferences, and educational specifications for school design, which evolve over time. The information contained in this Study is based on the District’s assessment of existing facility capacity (i.e., its

existing levels of service) and the degree to which residential and commercial development increases need and demand for new, expanded or refurbished school facilities (i.e., new or improved levels of service) that meet state and local educational specifications. Thus, the analysis provided in this study addresses the “level of service” analysis required by AB 602.

SECTION III. PROJECTED UNHOUSED STUDENTS AND FACILITY REQUIREMENTS

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

A. SCHOOL DISTRICT CAPACITY AND CURRENT STUDENT ENROLLMENT

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

The School District currently operates nineteen (19) elementary schools, five (5) middle schools, three (3) comprehensive high schools, one (1) continuation school and one (1) alternative education school. These facilities include 992 eligible permanent teaching stations. As further described in this Study, many of the portable classrooms at the School District's sites are aged and have been deemed inadequate for long-term use and require replacement. Accordingly, the number of eligible classrooms was adjusted to exclude portables since the collection of Applicable School Fees will be used in part to replace portable classrooms with new classrooms. Based on loading standards set forth in the California Code of Regulations, Title II, Section 1859.35, which sets capacity on a district-wide basis rather than school-level, and is consistent with the loading standards recognized by the Office of Public School Construction (OPSC) the eligible classrooms have capacity to accommodate 25,854 seats. Appendix "B" provides a more detailed breakout of eligible facilities capacity.

Based on October 2021 California Basic Educational Data System (CBEDS) data, the student enrollment of the School District is 24,083 students. This enrollment figure does not include preschool students. The School District's enrollment as of October 2021 is summarized in Appendix "C". Current available capacity is calculated by subtracting current student enrollment from existing school facilities capacity for each school level. This operation results in available seats at the elementary school, middle school and high school levels. The existing school facilities available capacity determination is shown in Table 1.

TABLE 1
FACILITIES CAPACITY AND STUDENT ENROLLMENT

SCHOOL LEVEL	EXISTING FACILITIES CAPACITY ^[1]	STUDENT ENROLLMENT (OCTOBER 2021)	AVAILABLE / (DEFICIT) CAPACITY
Elementary School (TK-5)	11,625	10,728	897
Middle School (6-8)	6,075	5,543	532
High School (9-12)	8,154	7,812	342
TOTAL	25,854	24,083	1,771

[1] Appendix “B” provides a detailed breakout of the facility capacity determination.

B. PROJECTED UNHOUSED STUDENTS

1. Projected Residential Units

In order to estimate the development of projected residential units over the next ten (10) years, Koppel & Gruber Public Finance (“K&G Public Finance”) first obtained and reviewed information provided by the Cities of Rialto, San Bernardino, Fontana and Colton and the County of San Bernardino Planning Departments, including but not limited to: city housing element updates, specific plans, tract and land entitlement information, and actions taken by local agency planning commissions. It is projected based on this information that the School District could experience the development of 3,540 residential units over the next ten (10) years (“Total Projected Units”). The projected residential units (“Projected Units”) are summarized by residential category in Table 2 below. The types of residential units considered include (i) single family detached (“SFD”) and (iii) multi-family units (“MF”). Units classified as single family detached (“SFD”) are those units with no common walls; and multi-family units (“MF”) are those units which share a single assessor’s parcel and/or share a common wall (e.g. apartments, duplexes, townhomes, condominiums, etc.).

Projected residential units having mitigated their impact through an alternative to paying School Fees, such as participation in a Community Facilities District or through execution of a mitigation agreement are subtracted from the Total Projected Units. However, currently no property owners have mitigated their impact to the School District through participation in a Community Facilities District or through execution of a mitigation agreement.

The number of Projected Units is summarized by residential category in Table 2.

TABLE 2
PROJECTED UNITS BY RESIDENTIAL CATEGORY

RESIDENTIAL CATEGORY	PROJECTED UNITS
Single-Family Detached (SFD)	1,713
Multi-Family (MF)	1,827
TOTAL	3,540

2. Student Generation Rates

In order to calculate student generation rates (“SGRs”), K&G Public Finance obtained County property characteristic data. The property characteristic database contains property information for parcels within the School District, including land use class designations (i.e. condominiums, single family dwellings, etc.), physical address (situs), and number of units for many but not all parcels. Parcels in the database were classified by unit type (SFD, SFA and MF) and the number of units applicable to these properties was researched and inputted as needed. Since the County property data was missing unit counts for many of the residential parcels contained therein, K&G Public Finance relied on housing information from the U.S. Census Bureau¹ to estimate the total number of residential units located within the School District by residential category.

K&G Public Finance then obtained a student database from the School District, which contained the school attended, grade level and physical address information for each student enrolled in the School District. The student database is reflective of student enrollment information as of October 2021. The student enrollment address information was matched to parcels in the County property characteristic database. Students could not be matched if they were inter-district or they did not have a valid residential address. The number of students matched was then queried by school level and residential category, as provided by the U.S. Census Bureau. Table 3 provides a summary of the SGRs by school level and residential category. A more detailed analysis of the SGR determinations is contained within Appendix “D”.

TABLE 3
STUDENT GENERATION RATES SUMMARY

SCHOOL LEVEL	SFD UNITS	MF UNITS
Elementary School (TK-5)	0.2986	0.3090
Middle School (6-8)	0.1529	0.1585
High School (9-12)	0.2201	0.1933
TOTAL	0.6716	0.6608

¹ 2020 American Community Survey 5-Year Estimates: DP04 - Selected Housing Characteristics

3. Projected Student Enrollment

Projected student enrollment was determined by multiplying the SGRs in Table 3 by the number of Projected Units shown in Table 2. A total of 2,359 students are estimated to be generated from Projected Units. The projected student enrollment is summarized by school level in Table 4.

TABLE 4
PROJECTED STUDENT ENROLLMENT BY SCHOOL LEVEL

SCHOOL LEVEL	PROJECTED STUDENT ENROLLMENT
Elementary School (TK-5)	1,077
Middle School (6-8)	552
High School (9-12)	730
TOTAL	2,359

4. Projected Unhoused Students

As shown in Table 1, there is available facility capacity at the elementary school, middle school and high school levels. It should be noted that while these findings indicate the School District's collective permanent capacity exceeds current enrollment, the analysis doesn't consider (i) the availability of capacity within areas of the School District where a greater and disproportionate amount of new development is expected (ii) the condition and adequacy of existing capacity, or (iii) the service and educational goals of the School District.

It anticipated that future student enrollment will exceed existing permanent facilities capacity. Reducing available seats by projected student enrollment at each school level results in the number of Projected Unhoused Students, which is summarized in Table 5 below.

TABLE 5
PROJECTED UNHOUSED STUDENTS

SCHOOL LEVEL	PROJECTED STUDENT ENROLLMENT (10-YEAR)	AVAILABLE SEAT ADJUSTMENT	PROJECTED UNHOUSED STUDENTS
Elementary School (TK-5)	1,077	897	180
Middle School (6-8)	552	532	20
High School (9-12)	730	342	388
TOTAL	2,359	1,771	588

C. FACILITIES NEEDS COSTS AND ESTIMATED PER STUDENT COST

1. Facilities Needs

Government Code Section 66001 (g) allows School Fees to include the costs attributable to the increased demand for public facilities reasonably related to the development project(s) in which the fee is imposed in order to (1) refurbish existing facilities to maintain the existing level of service or (2) achieve an adopted level of service that is consistent with the general plan.

The determination of projected unhoused students shown in Table 5 demonstrates that adequate permanent facilities capacity does not exist to house the total number of Projected Student Enrollment at the elementary school, middle school and high school levels. Thus, the expansion of school facilities will be required to accommodate the Projected Unhoused Students. Further, California Assembly Bill 130, a TK-12 trailer bill which was signed by the Governor in September 2021, expands TK age eligibility in two-birth month increments over a period of 4 years commencing with the 2022-23 school year (the “Universal Transitional Kindergarten Program”). The Universal Transitional Program also requires TK programs to operate with a student-teacher ratio of 12:1 in 2022-23 and transitioning to a 10:1 ratio by 2023-24, contingent upon budget appropriations. While the effects of the Universal Transitional Program on the School District’s school facilities are difficult to realistically project for the purposes of this Study, it’s anticipated the program will increase enrollment growth from both existing housing as well as Projected Units, and such enrollment growth could increase the demand on school facilities.

In addition to the need for the expansion of school facilities to accommodate Projected Unhoused Students, capital improvement projects are necessary for the long-term use and adequate housing of student enrollment at the School District’s existing facilities to maintain and achieve an adopted level of service. The facilities needs exist regardless of the availability of capacity to house student enrollment, inclusive of student enrollment generated from new development. As of the date of this report, the School District is in the early stages of completing an updated Facilities Master Plan (“FMP”). It is expected that the FMP will provide recommendations for repair, replacement or upgrade of facilities on the basis of multiple objectives, including updated building and safety codes, energy savings potential, and program needs.

Revenues from the imposition of the applicable school fees are intended to fund, in part, estimated costs for the construction of new classroom facilities and capital improvement projects required to accommodate Projected Student Enrollment.

2. Estimated per Student Cost

The estimated total cost impact per student to provide adequate school facilities to house Projected Unhoused Students for each school level was derived using cost estimates provided to the School District for the construction of a new two-story building planned to replace thirty portable classrooms and adjusted to 2022 dollars. The estimated cost per square foot was then multiplied by the square footage requirements per student as determined by the California Department of Education Report on Complete Students, dated May 23, 2007, which results in the Total Facilities Cost Impact per Seat/Student. This computation is shown in Table 6 and provides the resulting estimated average Facilities Cost Impact per Student/Seat by school level.

TABLE 6
FACILITIES COST IMPACT PER STUDENT

SCHOOL LEVEL	SQUARE FOOTAGE REQUIREMENT PER STUDENT ¹	ESTIMATED COST PER SQUARE FOOT	FACILITIES COST IMPACT PER STUDENT/SEAT
Elementary School (TK-5)	73	\$725	\$52,925
Middle School (6-8)	80	\$725	\$58,000
High School (9-12)	95	\$725	\$68,875

¹ Source: California Department of Education Report on Complete Schools, dated May 23, 2007

SECTION IV. PROJECTED IMPACT OF RESIDENTIAL DEVELOPMENT

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

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

**TABLE 7
FACILITIES COST IMPACT**

SCHOOL LEVEL	PROJECTED UNHOUSED STUDENTS	FACILITIES COST IMPACT PER STUDENT/SEAT	TOTAL FACILITIES COST IMPACT
Elementary School (TK-5)	180	\$52,925	\$9,526,500
Intermediate School (6-8)	20	\$58,000	\$1,160,000
High School (9-12)	388	\$68,875	\$26,723,500
TOTAL			\$37,410,000

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

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

TOTAL FACILITIES COST IMPACT	PROJECTED UNITS	FACILITIES COST IMPACT PER RESIDENTIAL UNIT
\$37,410,000	3,540	\$10,568

The school facilities cost impact per residential square foot is calculated by dividing the school facilities cost per residential unit determined in Table 8 by the average square footage of a residential unit. This calculation is shown in Table 9. The weighted average square footage was based upon historical property characteristic data within the District and residential projects anticipated to complete within the next ten years, and the composition of projected development types.

TABLE 9
SCHOOL FACILITIES COST PER RESIDENTIAL SQUARE FOOT

FACILITIES COST IMPACT PER RESIDENTIAL UNIT	WEIGHTED AVERAGE SQUARE FOOTAGE	FACILITIES COST PER RESIDENTIAL SQUARE FOOT
\$10,568	1,800	\$5.87

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

SECTION V. COMMERCIAL/INDUSTRIAL SCHOOL IMPACT ANALYSIS

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

A. EMPLOYEE GENERATION

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

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

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

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

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

B. RESIDENTIAL IMPACT

1. Households

To evaluate the impact of commercial/industrial development on School District facilities, the employee generation estimates listed in Table 10 were first used to determine the impact of commercial/industrial development on a per household basis. Based on information obtained from the U.S. Census Bureau², there are approximately 1.68 employed persons per household on average for households located within the School District. Dividing the employee generation estimates listed in Table 10 by 1.68 results in the estimated number of households per 1,000 square feet of commercial/industrial development (“Total Household Impact”).

The Total Household Impact determined in the preceding paragraph takes into consideration all employees generated from commercial/industrial development. Since some of those employees will live outside the School District and therefore will have no impact on the School District, the figures are adjusted to reflect only those households within the School District occupied by employees generated from commercial/industrial development built within the School District. Based on information derived from U.S. Census Bureau data³, it is estimated that approximately 14.8% of employees both live and work within the School District. Multiplying the Total Household Impact by 14.8% results in the households within the School District impacted per 1,000 square feet commercial/industrial development. The results of these computations are shown in Table 11.

² Based on data for the District drawn from the 2020 American Community Survey 5-Year Estimates: DP04 - Selected Housing Characteristics and DP03 - Selected Economic Characteristics.

³ 2020 American Community Survey 5-Year Estimates: S0801 - Commuting Characteristics (Worked in place of residence).

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

COMMERCIAL/INDUSTRIAL CATEGORY	SCHOOL DISTRICT HOUSEHOLDS PER 1,000 SQUARE FEET COM./IND.
Banks	0.2489
Community Shopping Center	0.1352
Neighborhood Shopping Center	0.2465
Industrial Business Parks	0.3097
Industrial/Warehousing/Manufacturing	0.1187
Rental Self-Storage	0.0057
Research & Development	0.2679
Hospitality (Lodging)	0.0998
Commercial Offices (Standard)	0.4219
Commercial Offices (Large High Rise)	0.4003
Corporate Offices	0.2365
Medical Offices	0.3758

2. Household Student Generation

The student generation impacts per 1,000 square feet of commercial/industrial development were calculated by multiplying the household impacts shown in Table 11 by blended student generation rates determined for each school level. The result of this calculation is shown in Table 12. The determination of the student generation rates are shown and described in Appendix “D” of this Study.

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

COMMERCIAL/INDUSTRIAL CATEGORY	ELEMENTARY SCHOOL STUDENT GENERATION	MIDDLE SCHOOL STUDENT GENERATION	HIGH SCHOOL STUDENT GENERATION	TOTAL STUDENT GENERATION
Banks	0.0757	0.0388	0.0513	0.1658
Community Shopping Center	0.0411	0.0211	0.0279	0.0901
Neighborhood Shopping Center	0.0749	0.0384	0.0509	0.1642
Industrial Business Parks	0.0941	0.0483	0.0639	0.2063
Industrial/Warehousing/ Manufacturing	0.0361	0.0185	0.0245	0.0791
Rental Self-Storage	0.0017	0.0009	0.0012	0.0038
Research & Development	0.0814	0.0417	0.0553	0.1784
Hospitality (Lodging)	0.0303	0.0155	0.0206	0.0664
Commercial Offices (Standard)	0.1283	0.0657	0.0870	0.2810
Commercial Offices (Large High Rise)	0.1217	0.0624	0.0826	0.2667
Corporate Offices	0.0719	0.0368	0.0488	0.1575
Medical Offices	0.1142	0.0585	0.0775	0.2502

C. NET IMPACT PER COMMERCIAL/INDUSTRIAL SQUARE FOOT

1. Cost Impact

To estimate the school facilities costs required to house new students as a result of additional commercial/industrial development, the total school facilities cost per student was determined by multiplying the costs per student summarized in Table 6 by the total student generation impacts calculated in Table 12. The school facilities cost impacts are shown in Table 13 by commercial/industrial development category and school level.

TABLE 13
SCHOOL FACILITIES COSTS PER 1,000 SQUARE FEET OF
COMMERCIAL/INDUSTRIAL DEVELOPMENT

COMMERCIAL/INDUSTRIAL CATEGORY	ELEMENTARY SCHOOL IMPACT	MIDDLE SCHOOL IMPACT	HIGH SCHOOL IMPACT	TOTAL COST IMPACT
Banks	\$4,006	\$2,250	\$3,533	\$9,789
Community Shopping Center	\$2,175	\$1,224	\$1,922	\$5,321
Neighborhood Shopping Center	\$3,964	\$2,227	\$3,506	\$9,697
Industrial Business Parks	\$4,980	\$2,801	\$4,401	\$12,182
Industrial/Warehousing/ Manufacturing	\$1,911	\$1,073	\$1,687	\$4,671
Rental Self-Storage	\$90	\$52	\$83	\$225
Research & Development	\$4,308	\$2,419	\$3,809	\$10,536
Hospitality (Lodging)	\$1,604	\$899	\$1,419	\$3,922
Commercial Offices (Standard)	\$6,790	\$3,811	\$5,992	\$16,593
Commercial Offices (Large High Rise)	\$6,441	\$3,619	\$5,689	\$15,749
Corporate Offices	\$3,805	\$2,134	\$3,361	\$9,300
Medical Offices	\$6,044	\$3,393	\$5,338	\$14,775

2. Residential Fee Offsets

New commercial/industrial development within the School District will generate new employees, thereby increasing the need for new residential development to house those employees living in the School District. Applicable residential school fees adopted by the School District under applicable law will also be imposed by the School District on such new residential development. To prevent new commercial/industrial development from paying the portion of impact that is mitigated by the applicable residential school fees, this amount has been calculated and deducted from the school facilities impact costs calculated in Table 13.

The residential fee offsets are first calculated by using the proposed Level I Fee of \$4.79 per square foot for residential development and multiplying that amount by the weighted average square footage of a residential unit in the School District, which is 1,800 square feet. This calculation provides the average residential revenues from a

residential unit of \$8,622 (\$4.79 x 1,800). The average residential revenues from a residential unit multiplied by Household Impacts per 1,000 square feet of commercial/industrial development, as shown in Table 11, results in the residential school fee revenues per 1,000 square feet of commercial/industrial development (“Residential Fee Offset”). This computation is shown in Table 14.

**TABLE 14
RESIDENTIAL FEE OFFSET**

COMMERCIAL/INDUSTRIAL CATEGORY	HOUSEHOLDS PER 1,000 SQUARE FEET COM./IND.	RESIDENTIAL FEE OFFSET PER 1,000 SQUARE FEET COM./IND.
Banks	0.2489	\$2,146
Community Shopping Center	0.1352	\$1,166
Neighborhood Shopping Center	0.2465	\$2,125
Industrial Business Parks	0.3097	\$2,670
Industrial/Warehousing/Manufacturing	0.1187	\$1,023
Rental Self-Storage	0.0057	\$49
Research & Development	0.2679	\$2,310
Hospitality (Lodging)	0.0998	\$860
Commercial Offices (Standard)	0.4219	\$3,638
Commercial Offices (Large High Rise)	0.4003	\$3,451
Corporate Offices	0.2365	\$2,039
Medical Offices	0.3758	\$3,240

3. Net School Facilities Costs

Subtracting the Residential Fee Offset determined in Table 14 from the total school facilities costs listed in Table 13 results in the net school facilities costs per 1,000 square feet of commercial/industrial development (“Net School Facilities Costs”). The Net School Facilities Costs are listed in Table 15.

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

CATEGORY	TOTAL SCHOOL FACILITIES COSTS	RESIDENTIAL FEE OFFSET	NET SCHOOL FACILITIES COSTS
Banks	\$9,789	\$2,146	\$7,643
Community Shopping Center	\$5,321	\$1,166	\$4,155
Neighborhood Shopping Center	\$9,697	\$2,125	\$7,572
Industrial Business Parks	\$12,182	\$2,670	\$9,512
Industrial/Warehousing/Manufacturing	\$4,671	\$1,023	\$3,648
Rental Self-Storage	\$225	\$49	\$176
Research & Development	\$10,536	\$2,310	\$8,226
Hospitality (Lodging)	\$3,922	\$860	\$3,062
Commercial Offices (Standard)	\$16,593	\$3,638	\$12,955
Commercial Offices (Large High Rise)	\$15,749	\$3,451	\$12,298
Corporate Offices	\$9,300	\$2,039	\$7,261
Medical Offices	\$14,775	\$3,240	\$11,535

The Net School Facilities Costs determined in Table 15 were then divided by 1,000⁴ to provide the cost impact on a square foot basis. These cost impacts are listed in Table 16.

⁴ The Employee Generation Rates derived from the SANDAG Traffic Study are estimated per 1,000 square feet of development.

TABLE 16
NET COST IMPACTS
PER SQUARE FOOT OF COMMERCIAL/INDUSTRIAL DEVELOPMENT

CATEGORY	NET COST IMPACTS
Banks	\$7.64
Community Shopping Center	\$4.16
Neighborhood Shopping Center	\$7.57
Industrial Business Parks	\$9.51
Industrial/Warehousing/Manufacturing	\$3.65
Rental Self-Storage	\$0.18
Research & Development	\$8.23
Hospitality(Lodging)	\$3.06
Commercial Offices (Standard)	\$12.96
Commercial Offices (Large High Rise)	\$12.30
Corporate Offices	\$7.26
Medical Offices	\$11.53

The net cost impacts shown in Table 16 are equal to or exceed the maximum authorized statutory school fee for commercial/industrial development of \$0.78 per square foot, except for the categories of Rental Self-Storage development. Therefore, the School District is justified in levying school fees on commercial/industrial in amount up to but not exceeding the maximum authorized statutory fee, or the net cost impacts determined for the categories of Rental Self-Storage.

D. COMMERCIAL/INDUSTRIAL DEVELOPMENT NOT IN PRESCRIBED CATEGORIES

In cases where new commercial/industrial development does not fit within the prescribed categories shown in Table 16, the School District shall evaluate such development on a case-by-case basis to determine if the imposition of the School Fees on the development meets the nexus requirements set forth under Government Code Section 66000 et seq. The School District may levy School Fees on such development in an amount up to but not exceeding the cost per square foot impact determined through such evaluation.

E. AGE RESTRICTED (SENIOR) HOUSING

The School District must exercise discretion in determining whether a particular project qualifies as “senior citizen housing” for the purpose of imposing developer fees. (See California Ranch Homes Development Co. v. San Jacinto Unified School Dist. (1993) 17 Cal.App.4th 573, 580–581.) The School District acknowledges Section 65995.1 and will levy its share of School Fees on qualifying senior citizen housing projects at the current commercial/industrial rate of \$0.78 per square foot as justified herein. The School District

will require proof that such senior units are indeed restricted to seniors (i.e. a copy of the recorded CC&Rs or deed(s)) and reserves the right to revoke a Certificate of Compliance and/or require payment of difference of the amount per square foot paid to the then current amount of School Fees being levied on residential development per square foot should such CC&Rs or deed(s) be modified to allow students to reside in such the housing units. If there is any uncertainty as to whether a project qualifies as senior citizen housing or will, in fact, remain senior citizen housing beyond initial approval, the School District may wish to seek cooperation from the developer as a condition of levying the commercial/industrial School Fee rate. Such cooperation could take the form of an agreement by the developer to include a restriction in the recorded CC&Rs conditioning subsequent changes in residency requirements on the owner's payment of applicable developer fees, and to notify the School District of changes in residency requirements and/or to provide current residency data upon School District's request.

SECTION VI. REDEVELOPMENT

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

Redevelopment means voluntarily demolishing existing residential, commercial, and/or industrial structures and subsequently replacing them with new construction (“Redevelopment”). The School District is aware of Redevelopment projects completed within the School District boundaries and anticipates similar Redevelopment projects may be completed in the next ten (10) years and beyond. School fees authorized pursuant to Education Code Section 17620 and Government Code Sections 65995 et seq. shall be levied by the School District on new construction resulting from Redevelopment projects, if there is a nexus between the School Fees being imposed and the impact of new construction on school facilities, after the impact of pre-existing development has been taken into consideration. In determining such nexus, the School District shall review, evaluate and determine on a case-by-case basis, the additional impact of the proposed new development by comparing the projected square footage, student generation and cost impacts of the proposed new construction and the pre-existing residential, commercial and/or industrial development. Such analysis shall utilize the student generation rates identified in Table 3 of this Study, as applicable.

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

SECTION VII. GOVERNMENT CODE SECTION 66000

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

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

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

PURPOSE OF THE SCHOOL FEE

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

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

IDENTIFY THE USE OF THE SCHOOL FEE

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

- (i). Construction or reconstruction of school facilities required to accommodate students generated by new residential and commercial/industrial development in areas of the School District where existing school facilities are needed;
- (ii). Construction or reconstruction of administrative and operations facilities required in response to new student growth from new development;
- (iii). Acquisition or lease of property for unhoused students generated from new development;
- (iv). Purchase or lease of interim and/or temporary school facilities in order to accommodate student capacity demands;
- (v). Costs associated with the administration, collection, and justification for the Applicable School Fees;
- (vi). Provide local funding that may be required if the School District applies for State funding through SB 50.

RELATIONSHIP BETWEEN THE USE OF THE FEE, THE NEED FOR SCHOOL FACILITIES AND THE TYPE OF DEVELOPMENT ON WHICH THE FEE IS IMPOSED

As determined in the preceding sections, existing school facilities are in need of upgrade for their continued long-term use and to provide adequate and safe housing for existing student enrollment and students generated from new residential and commercial/industrial development. The fees imposed on such new development will be used, in part, to finance the construction and/or reconstruction of school facilities required to accommodate student enrollment growth generated by new residential and commercial/industrial development.

DETERMINATION OF THE RELATIONSHIP BETWEEN THE FEE AMOUNT AND THE SCHOOL FACILITIES COSTS ATTRIBUTABLE TO TYPE OF DEVELOPMENT ON WHICH THE FEE IS IMPOSED

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

Similarly, the imposition of the Applicable Com/Ind. School Fees of \$0.78 per square foot of commercial/industrial development are justified as the fees are equal to or below the estimated per square foot net cost impact to provide adequate school facilities required as a result of such new commercial/industrial development, except for Rental Self-Storage development. For the listed commercial/industrial categories, the net cost impacts determined herein are below the applicable maximum outlined fee of \$0.78 per square foot. Therefore, the applicable commercial/industrial School Fees imposed on new commercial/industrial development classified under these categories shall not exceed the Net Cost Impacts.

ACCOUNTING PROCEDURES FOR THE FEES

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

APPENDIX A
COMMERCIAL/INDUSTRIAL DEVELOPMENT DESCRIPTIONS

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

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

APPENDIX B - FACILITIES CAPACITY UPDATE

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

Classroom Inventory

School Level	School Site	Permanent Classrooms	Portable Classrooms	Total Classrooms
Elementary School	Bemis	20	9	29
	Boyd	22	4	26
	Casey	22	14	36
	Curtis	30	0	30
	Dollahan	24	6	30
	Dunn	22	10	32
	Fitzgerald	26	0	26
	Garcia	26	2	28
	Henry	22	7	29
	Hughbanks	25	3	28
	Kelley	18	6	24
	Kordyak	39	0	39
	Morgan	18	10	28
	Morris	24	0	24
	Myers	20	5	25
	Preston	21	5	26
Simpson	24	10	34	
Trapp	24	0	24	
Werner	38	2	40	
ELEMENTARY SCHOOL TOTALS		465	93	558
Middle School	Frisbie	36	13	49
	Jehue	48	6	54
	Kolb	39	8	47
	Kucera	43	0	43
	Rialto	59	0	59
MIDDLE SCHOOL TOTALS		225	27	252
High School	Carter	114	0	114
	Eisenhower	72	40	112
	Rialto	116	4	120
	Milor/Zupanic	0	23	23
HIGH SCHOOL TOTALS		302	67	369
Total		992	187	1,179

Facilities Capacity by School Levels

Description	K-5	6-8	9-12
Permanent Classrooms	465	225	302
Loading Standard per Classroom	25	27	27
Facilities Capacity¹	11,625	6,075	8,154

¹ School capacities are determined based on loading factors of 25 pupils per classroom for grades K through 6, 27 pupils per classroom for grades 7 through 12, 9 pupils per classroom for severe pupils and 13 pupils

per classroom for non-severe pupils as set forth in the California Code of Regulation, Title II, Section 1859.35.

APPENDIX C – STUDENT ENROLLMENT SUMMARY

**RIALTO UNIFIED SCHOOL DISTRICT
2021/2022 ENROLLMENT
APPENDIX C**

Enrollment														
School Name							Middle			High				Grand Total
	TK/K	1	2	3	4	5	6	7	8	9	10	11	12	
BEMIS ELEMENTARY	99	70	84	81	81	100	0	0	0	0	0	0	0	515
BOYD ELEMENTARY	90	79	92	95	109	106	0	0	0	0	0	0	0	571
CARTER HIGH SCHOOL	0	0	0	0	0	0	0	0	0	586	566	633	523	2,308
CASEY ELEMENTARY	80	81	82	107	104	110	0	0	0	0	0	0	0	564
CURTIS ELEMENTARY	141	85	103	87	92	98	0	0	0	0	0	0	0	606
DOLLAHAN ELEMENTARY	111	89	83	79	91	113	0	0	0	0	0	0	0	566
DUNN ELEMENTARY	86	104	88	69	85	102	0	0	0	0	0	0	0	534
EISENHOWER HIGH SCHOOL	0	0	0	0	0	0	0	0	0	558	596	604	518	2,276
FITZGERALD ELEMENTARY	102	92	69	79	69	85	0	0	0	0	0	0	0	496
FRISBIE MIDDLE SCHOOL	0	0	0	0	0	0	303	324	329	0	0	0	0	956
GARCIA ELEMENTARY	74	105	93	99	109	106	0	0	0	0	0	0	0	586
HENRY ELEMENTARY	117	122	110	101	110	88	0	0	0	0	0	0	0	648
HUGHBANKS ELEMENTARY	71	53	66	74	86	68	0	0	0	0	0	0	0	418
JEHUE MIDDLE SCHOOL	0	0	0	0	0	0	449	467	534	0	0	0	0	1,450
KELLEY ELEMENTARY	86	131	123	109	113	112	0	0	0	0	0	0	0	674
KOLB MIDDLE SCHOOL	0	0	0	0	0	0	285	322	328	0	0	0	0	935
KORDYAK ELEMENTARY	84	94	84	103	79	122	0	0	0	0	0	0	0	566
KUCERA MIDDLE SCHOOL	0	0	0	0	0	0	286	315	331	0	0	0	0	932
MILOR HIGH SCHOOL	0	0	0	0	0	0	0	0	0	0	1	30	149	180
MORGAN ELEMENTARY	92	86	79	91	83	88	0	0	0	0	0	0	0	519
MORRIS ELEMENTARY	85	103	110	81	115	113	0	0	0	0	0	0	0	607
MYERS ELEMENTARY	85	84	84	60	82	84	0	0	0	0	0	0	0	479
PRESTON ELEMENTARY	100	79	84	90	82	84	0	0	0	0	0	0	0	519
RIALTO HIGH SCHOOL	0	0	0	0	0	0	0	0	0	721	788	757	591	2,857
RIALTO MIDDLE SCHOOL	0	0	0	0	0	0	456	386	428	0	0	0	0	1,270
SIMPSON ELEMENTARY	152	110	96	84	90	106	0	0	0	0	0	0	0	638
TRAPP ELEMENTARY	76	90	92	98	81	89	0	0	0	0	0	0	0	526
WERNER ELEMENTARY	95	113	122	119	139	108	0	0	0	0	0	0	0	696
ZUPANIC HIGH SCHOOL	0	0	0	0	0	0	0	0	0	34	46	54	57	191
GRAND TOTAL	1,826	1,770	1,744	1,706	1,800	1,882	1,779	1,814	1,950	1,899	1,997	2,078	1,838	24,083
TOTAL BY SCHOOL LEVEL						10,728			5,543				7,812	24,083

APPENDIX D – DISTRICT-WIDE STUDENT GENERATION RATES

**TABLE D-1
SCHOOL DISTRICT-WIDE
STUDENT GENERATION RATES**

SCHOOL LEVEL	SFD UNITS	MF UNITS
Elementary School (TK-5)	0.2986	0.3090
Middle School (6-8)	0.1529	0.1585
High School (9-12)	0.2201	0.1933
TOTAL	0.6716	0.6608

**TABLE D-2
SINGLE FAMILY DETACHED (SFD)
STUDENT GENERATION RATES**

SCHOOL LEVEL	NO. OF STUDENTS MATCHED	TOTAL UNITS ^[1]	STUDENT GENERATION RATE
Elementary School (TK-5)	7,148	23,940	0.2986
Middle School (6-8)	3,661	23,940	0.1529
High School (9-12)	5,270	23,940	0.2201
TOTAL	16,079	NA	0.6716

^[1]2020 American Community Survey 5-Year Estimates: DP04 - Selected Housing Characteristics

**TABLE D-3
MULTI-FAMILY (MF)
STUDENT GENERATION RATES**

SCHOOL LEVEL	NO. OF STUDENTS MATCHED	TOTAL UNITS ^[1]	STUDENT GENERATION RATE
Elementary School (TK-6)	1,899	6,145	0.3090
Middle School (7-8)	974	6,145	0.1585
High School (9-12)	1,188	6,145	0.1933
TOTAL	4,061	NA	0.6608

^[1]2020 American Community Survey 5-Year Estimates: DP04 - Selected Housing Characteristics

**TABLE D-4
ALLOCATION OF NET PROJECTED UNITS BY RESIDENTIAL CATEGORY**

RESIDENTIAL CATEGORY	NET PROJECTED UNITS	PERCENTAGE ALLOCATION
SFD	1,713	48%
MF	1,827	52%
TOTAL	3,540	100%

The Blended Student Generation Rates were determined by applying the percentage allocations, in Table D-4 by the Student Generation Rates shown in Table D-1, the results of which are shown in Table D-5.

**TABLE D-5
BLENDED STUDENT GENERATION RATES**

SCHOOL LEVEL	BLENDED STUDENT GENERATION RATE
Elementary School (TK-5)	0.3040
Middle School (6-8)	0.1558
High School (9-12)	0.2063
TOTAL	0.6661