



Rialto Unified School District
2024 Fee Justification Study

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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 fee justification study pursuant to the provisions of Education Code Section 17620 and Sections 65995 and 66001 of the Government Code. The 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 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, 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 fee on January 24, 2024 and the maximum School Fees authorized by Education Code Section 17620 are currently \$5.17 per square foot for residential construction/reconstruction and \$0.84 per square foot for commercial/industrial construction for unified school districts.

The School District serves areas within the Cities of Colton, Fontana, Rialto and San Bernardino (each a “City” or collectively the “Cities”) as well as portions of unincorporated areas of the County of San Bernardino (“County”) and provides education for transitional kindergarten (TK) through 12th grade. 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 \$5.17 per square foot for residential construction/reconstruction and \$0.84 per square foot for categories of commercial/industrial development¹.

Residential Development

New residential development in the School District is projected over the next ten (10) years and beyond. Based on student generation rates determined for the School District, new residential development could generate an estimated 2,331 new students over the next ten (10) years. An analysis of the School District’s existing permanent facilities capacity and enrollment demonstrates the projected student enrollment does not support the need for the acquisition of new school sites or the construction of additional school campuses. The analysis does support expansion, construction and/or modernization of existing school facilities. The school facilities cost impact per residential square foot as determined in this Study are shown in Table E-1.

¹ Except for the new commercial/industrial development categorized as Rental Self-storage facilities, as further described in this Study.

TABLE E-1
**Residential School Facilities Cost Impact/
 Applicable Residential School Fee Per Square Foot**

Impact Per Square Foot	Applicable Residential School Fee Per Square Foot
\$5.49	\$5.17

The cost impact per square foot of residential construction/reconstruction shown in Table E-1 is greater than the maximum authorized residential School Fee, which is \$5.17 per square foot; therefore, the School District is reasonably justified in levying statutory Level I school fees in an amount up to but not exceeding \$5.17 per square foot (the “Applicable Residential School Fee”).

Commercial/Industrial Development

As commercial/industrial properties develop, new jobs are created. The imposition of School Fees on new commercial/industrial development is based upon the premise that this type of development will tend to attract families, thereby increasing the need for new residential development and further impacting the School District’s facilities. Additionally, many employees living outside of but working at new jobs within the School District boundaries will enroll students on an inter-district basis. 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 construction are equal to or exceed \$0.84 per square foot, the School District’s maximum authorized School Fee per square foot applicable to new commercial/industrial development; except for Community Shopping Center where a School Fee of \$0.54 per square foot is justified, Industrial Parks/Warehousing/Manufacturing where a School Fee of \$0.48 per square foot is justified, Rental Self-Storage where a School Fee of \$0.02 per square foot is justified, and Hospitality (Lodging) where a School Fee of \$0.40 per square foot is justified (“Applicable Com/Ind School Fees”). Therefore, the School District is fully justified in levying commercial/industrial School Fees on new commercial/industrial development in an amount up to but not exceeding the Applicable

Com/Ind School Fees. The Applicable Com/Ind School Fees that may be charged by the School District are summarized in Table E-2.

TABLE E-2
Commercial/Industrial School Facilities Cost Impacts/ Applicable School Fees

Commercial/Industrial Category	Impact Per Square Foot	Maximum Applicable Com/Ind School Fees
Banks	\$1.00	\$0.84
Community Shopping Center	\$0.54	\$0.54
Neighborhood Shopping Center	\$0.99	\$0.84
Industrial Business Parks	\$1.24	\$0.84
Industrial Parks/Warehousing/Manufacturing	\$0.48	\$0.48
Rental Self-Storage	\$0.02	\$0.02
Research & Development	\$1.08	\$0.84
Hospitality (Lodging)	\$0.40	\$0.40
Commercial Offices (Standard)	\$1.69	\$0.84
Commercial Offices (Large High Rise)	\$1.61	\$0.84
Corporate Offices	\$0.95	\$0.84
Medical Offices	\$1.51	\$0.84

SECTION I. LEGISLATION AND LEGAL REQUIREMENTS

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

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

AB 1600 was enacted by the State legislature in 1987 and created Government Code Sections 66000 *et seq.* These sections require a public agency to satisfy the 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.

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

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.

SECTION II. PROJECTED UNHOUSED STUDENTS AND ESTIMATED FACILITY AND PER STUDENT COSTS

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 the following sections to evaluate the cost impact per square foot for new residential and commercial/industrial property. Although many of the figures in this section are primarily derived from residential development projections and impacts, they are adjusted in Section IV to evaluate the impact of commercial/industrial development.

A. SCHOOL DISTRICT CAPACITY AND 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) schools serving grades TK through 5 ("Elementary School"), five (5) school serving grades 6 through 8 ("Middle School"), three (3) high schools serving grades 9 through 12 and one (1) continuation high school ("High School") and one (1) independent study and virtual program academy serving grades TK through 12. Per Education Code Section 17071.10 et seq., these facilities have a capacity to accommodate 28,681 students. Pursuant to Education Code Section 17071.30, portable classrooms were not included in the calculation to the extent they are (i) leased through the State Relocatable Classroom Program, (ii) leased when needed as interim housing (project basis), or (iii) represent the number of portables that exceed 25% of the School District's permanent classrooms. Appendix "B" provides a calculation of the updated facility capacity. It should be noted these capacities are driven by State loading standards and do not necessarily reflect the School District's program goals or the condition of such facilities.

Based on Student Enrollment Data as of October 2023, the student enrollment of the School District is 23,368 students. A summary of the student enrollment data is included in Appendix "C". Current available capacity is calculated by subtracting current student enrollment from existing school facilities capacity for each school level. In order to be consistent with the State loading factor reporting requirements under Education Code Section 17071.25, the capacity and enrollment school level configuration has been adjusted to represent grades transitional kindergarten through 6 at the elementary level and grades 7 and 8 at the middle school level. This operation results in a available capacity at all school levels. The available capacity calculation is shown in Table 1.

TABLE 1
Facilities Capacity and Student Enrollment

School Level	Facilities Capacity	Student Enrollment (October 2023) ¹	Available/(Deficit) Capacity
Elementary School (TK-6)	13,398	12,518	880
Middle School (7-8)	6,562	3,633	2,929
High School (9-12)	8,721	7,217	1,504
Total	28,681	23,368	5,313

1 The School District currently operates grades TK-5 Elementary Schools, grades 6-8 Middle Schools and grades 9-12 High Schools; the figures above have been categorized by school level to be consistent with the capacity calculations specified under Education Code Section 17071.25 .

B. PROJECTED UNHOUSED STUDENTS

1. Projected Residential Units

To estimate projected residential unit growth over the next ten (10) years, Koppel & Gruber Public Finance (“K&G Public Finance”) obtained and compiled information from the City Planning Divisions including, but not limited to: (i) a list of residential projects planned, approved and under construction and (ii) building permit records. Such information was used to project residential development for areas within each planning jurisdiction by housing type. Based on the information, it is estimated the School District could experience the development of an estimated 3,654 residential units over the next ten (10) years (“Projected Units”).

The types of residential units² considered include:

- (i) **Single family detached (“SFD”)** – dwelling units with no common walls and assigned an individual and separate assessor’s parcel;
- (ii) **Multi-family Attached units (“MFA”)** – dwelling units which share a single assessor’s parcel and/or share a common wall (e.g. apartments, duplexes, condominiums, townhomes, etc.).

It should be noted that Mobile homes are not included in this analysis.³ The estimated total Projected Units in the entire School District are summarized by residential category in Table 2 on the following page.

² Accessory Dwelling Units (ADUs) or Junior ADUs are independent residential dwelling units located on the same parcel as a primary residential dwelling. ADUs may be detached, attached, or located within the primary dwelling, including within garages and storage areas. ADUs are generally considered new construction because they are living areas that did not previously exist on the parcel or as a part of the primary home. Whether ADUs are called casitas, granny flats, in-law units, generational units, or converted living space, these areas are intended to provide a new area for living and sleeping – essentially a new residential unit which did not previously exist. The School District recognizes that students are projected to be generated from ADUs and will charge the appropriate fee rate for these types of new construction projects.

³ Education Code Section 17625 sets forth the prerequisites that must be met before school districts may levy school fees on mobile homes. Since it is often difficult to determine and make projections relating to mobile homes that meet those requirements, the mobile home category is omitted from this Study.

TABLE 2
Projected Units by Residential Category

Residential Category	Total Projected Units
Single-Family Detached (SFD)	1,648
Multi-Family Attached (MFA)	2,006
Total	3,654

2. Student Generation Rates

In order to calculate student generation rates (“SGRs”), K&G Public Finance first obtained property characteristic data from the County Assessor’s Office as of July 2023. Additional GIS data was obtained from the County. Parcels in the data file were classified by unit type (SFD, MFA) and residential parcels were extracted.

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 2023. The student enrollment address information was matched to the address (situs address) information of parcels in the County property characteristic database as well as to GIS data provided by the County. The number of students matched was then queried by school level and residential category. 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

School Level	SFD Units	MFA Units
Elementary School	0.3064	0.2940
Middle School	0.1517	0.1432
High School	0.2043	0.1805
Total	0.6624	0.6177

3. Projected Student Enrollment

Projected student enrollment was determined by multiplying the SGRs in Table 3 by the number of Projected Units as shown in Table 2. A total of 2,331 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	1,095
Middle School	537
High School	699
Total	2,331

4. Projected Unhoused Students

As shown in Table 1, existing facilities capacity exceeds enrollment across all school levels based on current student enrollment and existing capacity at the School District. While these findings indicate the School District’s collective capacity per school level is available to accommodate projected students from new development over the course of the ten-year planning period, the analysis and availability of seats to house Projected Student Enrollment does not consider projected student enrollment trends from existing housing nor does the analysis addresses (i) the condition and adequacy of existing capacity, and (ii) the service and educational goals of the School District. The capacity analysis does confirm the lack of need to acquire new school sites or the construction of additional school campuses, and rather supports expansion of school facilities at existing campuses, as needed.

In May 2023, the School District Board of Education adopted a 2022-23 Facilities Master Plan (“2023 Plan”), which among other items, provides detailed campus facility assessments. The 2023 Plan and the School District’s facility needs are discussed in more detail in Section II.C.1. The facility needs exist regardless of the availability of capacity to house student enrollment, inclusive of student enrollment generated from new development. Therefore, for the purpose of this analysis, Projected Student Enrollment is not adjusted by available capacity and student enrollment attributable to new housing that requires a seat (facilities), including new facilities and/or facilities to be replaced for their continued useful life (“Projected Unhoused Students”) is equal to Projected Student Enrollment. Table 5 shows the determination of Projected Unhoused Students by school level.

TABLE 5
Projected Unhoused Students

School Level	Projected Unhoused Students
Elementary School	1,095
Middle School	537
High School	699
Total	2,331

C. FACILITY NEEDS AND ESTIMATED PER SEAT/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 2023 Plan identifies both short-range and long-range facility needs and establishes a framework to guide implementation of improvements, repairs and upgrades at School District campuses in order to enhance the educational environment and with a commitment to school security, school connectedness, energy efficiencies and cost savings. The method of assessing the facilities and incorporating them into the 2023 Plan were conducted in three defining aspects: Codes and Safety, Housekeeping and Transformation. The facilities needs include, but are not limited to, the repair, reconfiguration and modernization of existing classrooms, the replacement of portable classrooms with permanent construction, construction of new classroom upgrades for ADA compliance, and system and security repairs and upgrades. The total budgeted cost of the facilities projects outlined in the 2023 Plan was \$642,610,271 in 2023 dollars.

The facilities needs established in the 2023 Plan are comprehensive in nature and exceed the School District current ability to fund the total estimated costs in their entirety. The primary source of funding for the projects is expected from general obligation bond sales issued under the School District’s Measure A bond authorization and State funding. Measure A was a local bond measure approved by the voters on November 8, 2022 and authorized the School District to issue up to \$340,000,000 in bonds to “*upgrade school fire/security/safety systems, science, engineering, math, arts, vocational classrooms; replace drinking water pipes, gas lines, leaky roofs, portable classrooms, electrical wiring; remove asbestos, lead paint, mold*” (“Measure A Authorization”). As of the date of this Study, the School District has issued one series of bonds under the Measure A Authorization totaling \$79,996.359.65, leaving \$260,003,640.35 of the authorization unissued.

Therefore, revenues from the imposition the School Fees are intended (i) to help bridge

the funding gap between (a) monies available from future general obligation bond proceeds, potentials funds from the State Facilities Program, funds on hand, and (b) the estimated costs of the capital improvement projects outlined in the 2023 Plan and (ii) other project costs not specified in the 2023 Plan.

The proposed 2023 Plan capital improvement projects will benefit both student enrollment from existing housing and student enrollment as a result of new development, and the presence of Projected Student Enrollment from new development will contribute toward the demand for such capital improvement projects. Revenues from the imposition of the applicable School Fees are intended to fund, in part, estimated costs for the implementation of capital improvement projects, inclusive of those identified in the 2023 Plan, required to accommodate Projected Unhoused Students. Table 6 below summarizes by school level the eligible cost estimates described in 2023 Plan, adjusted to 2024 dollars. The eligible estimated costs exclude deferred maintenance items identified in the 2023 Plan as Housekeeping, such as the upgrade and repair of HVAC systems, lighting, electrical and plumbing.

Table 6
Eligible Estimated Facilities Costs Per School Level

School Level	Eligible Estimated Facilities Costs ¹
Elementary School	\$234,127,872
Middle School	\$83,067,426
High School	\$116,891,578

¹ As determined in the 2023 Plan.

2. Estimated Cost Per Seat/Student

The estimated cost per student to provide adequate school facilities to house Projected Unhoused Students was derived from the estimated eligible costs of projects/modernization at specific school sites as outlined in the 2023 Plan and summarized in Table 6. The total costs were then divided by the existing facilities capacity (to determine the total Facilities Cost Impact per Seat/Student. This determination is shown in Table 7.

TABLE 7
Total Facilities Cost Impact Per Seat/Student

School Level	Eligible Estimated Facilities Costs ¹	Facilities Capacity ¹	Facilities Cost Impact per Seat/Student
Elementary School	\$234,127,872	13,398	\$17,475
Middle School	\$83,067,426	6,562	\$12,659
High School	\$116,891,578	8,721	\$13,403

¹ As determined in the 2023 Plan and adjusted to 2024 dollars.

SECTION III. PROJECTED IMPACT OF RESIDENTIAL DEVELOPMENT

The following sections present the school facility impact analysis for new residential development and provide step-by-step calculations of the estimated per residential square foot cost impact.

To determine the school facilities cost impact per square foot attributable to new residential development, first the Facilities Cost Impact per Seat/Student determined in Table 7 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 8 and reflects the estimated school facilities cost impact to house Projected Unhoused Students.

**TABLE 8
Total Facilities Cost Impact**

School Level	Facilities Cost Impact per Seat/Student	Projected Unhoused Students	Facilities Cost Impact
Elementary School	\$17,475	1,095	\$19,134,950
Middle School	\$12,659	537	\$6,797,808
High School	\$13,403	699	\$9,369,019
Total			\$35,301,776

The total school facilities impact shown in Table 8 above was then divided by the number of Projected Units shown in Table 2 to determine the school facilities cost per residential unit. The cost per residential unit is shown in Table 9.

**TABLE 9
School Facilities Cost per Residential Unit**

Total Facilities Cost Impact	Projected Units	Facilities Cost Impact per Residential Unit
\$35,301,776	3,654	\$9,661

The school facilities cost impact per residential square foot is calculated by dividing the school facilities cost per residential unit determined in Table 9 by the weighted average square footage of each residential unit type. This calculation is shown in Table 10. The weighted average square footage square footage of the Projected Units is estimated based on square footage information from recently constructed and ongoing development projects within the School District and in the Cities.

**TABLE 10
School Facilities Cost per Residential Square Foot**

Facilities Cost Impact per Residential Unit	Weighted Average Square Footage	Facilities Cost per Residential Square Foot
\$9,661	1,760	\$5.49

The school facilities impact per residential square foot determined in Table 10 is greater than the School District's current maximum authorized residential School Fees of \$5.17 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 IV. COMMERCIAL/INDUSTRIAL SCHOOL IMPACT ANALYSIS

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

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 11. The land use categories listed are based on those categories described in the Traffic Study and include all land uses recommended by the provisions of Education Code Section 17621(e)(1)(B).

**TABLE 11
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 11 were first used to determine the impact of commercial/industrial development on a per household basis. Based on information derived from U.S. Census Bureau data⁴, there are approximately 1.67 employed persons per household on average for households located within the School District. Dividing the employee generation estimates listed in Table 11 by 1.67 results in the estimated number of households per 1,000 square feet of commercial/industrial development (“Total Household Impact”).

The Total Household Impact determined in the preceding paragraph takes into consideration all employees generated from commercial/industrial development. Since some of those employees will live outside the School District and will therefore have no impact on the School District, the figures are adjusted to reflect only those households within the School District occupied by employees generated from commercial/industrial development built within the School District. Based on information derived from U.S. Census Bureau data⁵, it is estimated that approximately 18.90% percent of employees both live and work within the School District. Multiplying the Total Household Impact by 18.90% percent 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 12.

TABLE 12
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	0.3198
Community Shopping Center	0.1737
Neighborhood Shopping Center	0.3167
Industrial Business Parks	0.3979
Industrial Parks/Warehousing/Manufacturing	0.1525
Rental Self-Storage	0.0073
Research & Development	0.3441
Hospitality(Lodging)	0.1282
Commercial Offices (Standard)	0.5421
Commercial Offices (Large High Rise)	0.5143
Corporate Offices	0.3038
Medical Offices	0.4827

⁴ 2022 American Community Survey 5-Year Estimates; DP04-Selected Housing; DP03-Economic Characteristics (Civilian Employed).

⁵ 2022 American Community Survey 5-Year Estimates; S0801-Commuting Characteristics (Work in place of residence).

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 12 by blended student generation rates determined for each school level. The result of this calculation is shown in Table 13. The determination of student generation rates are shown and described in Appendix “D” of this Study.

TABLE 13
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	0.0958	0.0470	0.0611	0.2039
Community Shopping Center	0.0520	0.0255	0.0332	0.1107
Neighborhood Shopping Center	0.0949	0.0466	0.0606	0.2021
Industrial Business Parks	0.1192	0.0585	0.0761	0.2538
Industrial Parks/Warehousing/ Manufacturing	0.0457	0.0224	0.0292	0.0973
Rental Self-Storage	0.0022	0.0011	0.0014	0.0047
Research & Development	0.1031	0.0506	0.0658	0.2195
Hospitality (Lodging)	0.0384	0.0188	0.0245	0.0817
Commercial Offices (Standard)	0.1624	0.0797	0.1036	0.3457
Commercial Offices (Large High Rise)	0.1541	0.0756	0.0983	0.3280
Corporate Offices	0.0910	0.0447	0.0581	0.1938
Medical Offices	0.1446	0.0710	0.0923	0.3079

3. Inter-District Student Impact

Based on information provided by the School District, 1,079 students were enrolled at the School District on an inter-district basis as of October 2023, including 479 students at the Elementary School level, 269 students at the Middle School level, and 331 students at the High School level. Many of those inter-district students attend the School District as a result of their parents or guardians being employed at businesses located within the School District boundaries. To determine the inter-district impact of new commercial/industrial development, the number of inter-district students at each school level was first divided by the estimated number of employees within the School District’s area. Employment was estimated at 55,887⁶ based on data obtained from the U.S. Census Bureau. The ratio of inter-district students to estimated employment for each school level was then multiplied by the employee generation factors for each of the commercial/industrial categories as shown in Table 11. The calculation results in the Inter-District Student Impacts shown in Table 14.

⁶ 2022 American Community Survey 5-Year Estimates; DP03-Economic Characteristics (Civilian Employed).

TABLE 14
Inter-District Cost Impact per 1,000 Square Feet of Commercial/Industrial Development

Commercial/Industrial Category	Elementary School Cost Impact	Middle School Cost Impact	High School Cost Impact	Total Inter-District Cost Impact
Banks	0.0243	0.0136	0.0167	0.0546
Community Shopping Center	0.0132	0.0074	0.0091	0.0297
Neighborhood Shopping Center	0.0241	0.0134	0.0165	0.0540
Industrial Business Parks	0.0302	0.0169	0.0207	0.0678
Industrial Parks/ Warehousing/Manufacturing	0.0116	0.0065	0.0079	0.0260
Rental Self-Storage	0.0006	0.0003	0.0004	0.0013
Research & Development	0.0262	0.0146	0.0179	0.0587
Hospitality (Lodging)	0.0097	0.0054	0.0067	0.0218
Commercial Offices (Standard)	0.0412	0.0230	0.0283	0.0925
Commercial Offices (Large High Rise)	0.0391	0.0218	0.0268	0.0877
Corporate Offices	0.0231	0.0129	0.0158	0.0518
Medical Offices	0.0367	0.0205	0.0252	0.0824

4. Total Student Generation Impact

The Total Student Generation Impact is determined by adding the Student Generation Impacts shown in Table 13 to the Inter-District Impacts determined in Table 14. The Total Student Generation Impacts are listed in Table 15.

TABLE 15
Total Student Generation Impact
per 1,000 Square Feet of Commercial/Industrial Development

Commercial/Industrial Category	Elementary School Cost Impact	Middle School Cost Impact	High School Cost Impact	Total Student Generation Cost Impact
Banks	0.1201	0.0606	0.0778	0.2585
Community Shopping Center	0.0652	0.0329	0.0423	0.1404
Neighborhood Shopping Center	0.1190	0.0600	0.0771	0.2561
Industrial Business Parks	0.1494	0.0754	0.0968	0.3216
Industrial Parks/ Warehousing/Manufacturing	0.0573	0.0289	0.0371	0.1233
Rental Self-Storage	0.0028	0.0014	0.0018	0.0060
Research & Development	0.1293	0.0652	0.0837	0.2782
Hospitality (Lodging)	0.0481	0.0242	0.0312	0.1035
Commercial Offices (Standard)	0.2036	0.1027	0.1319	0.4382
Commercial Offices (Large High Rise)	0.1932	0.0974	0.1251	0.4157
Corporate Offices	0.1141	0.0576	0.0739	0.2456
Medical Offices	0.1813	0.0915	0.1175	0.3903

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 Facilities Cost Impact per Seat/Student determined in Table 7 is multiplied by the household impacts calculated in Table 15, resulting in the total school facilities cost impact per 1,000 square feet of commercial/industrial development. The total school facilities cost impacts are shown in Table 16 by commercial/industrial development category.

TABLE 16
School Facilities Costs per 1,000 Square Feet of Commercial/Industrial Development

Commercial/Industrial Category	Elementary School Cost Impact	Middle School Cost Impact	High School Cost Impact	Total School Facilities Cost Impact
Banks	\$2,099	\$767	\$1,043	\$3,909
Community Shopping Center	\$1,139	\$416	\$567	\$2,122
Neighborhood Shopping Center	\$2,080	\$760	\$1,033	\$3,873
Industrial Business Parks	\$2,611	\$954	\$1,297	\$4,862
Industrial Parks/ Warehousing/Manufacturing	\$1,001	\$366	\$497	\$1,864
Rental Self-Storage	\$49	\$18	\$24	\$91
Research & Development	\$2,259	\$825	\$1,122	\$4,206
Hospitality (Lodging)	\$841	\$306	\$418	\$1,565
Commercial Offices (Standard)	\$3,558	\$1,300	\$1,768	\$6,626
Commercial Offices (Large High Rise)	\$3,376	\$1,233	\$1,677	\$6,286
Corporate Offices	\$1,994	\$729	\$991	\$3,714
Medical Offices	\$3,168	\$1,158	\$1,575	\$5,901

2. Residential Fee Offsets

The total cost impacts determined in Table 16 represent the amounts required to fully mitigate the impact on school facilities, as a result of new commercial/industrial development within the School District. Many employees as a result of new commercial/industrial development will commute from areas outside of the School District boundaries or will reside in existing homes, from which no mitigation will be received from the housing in which they reside. However, new commercial/industrial development, and thereby new employee generation, will also increase 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 16.

The residential fee offsets are first calculated by using the Applicable Residential School Fee of \$5.17 per square foot and multiplying that amount by the weighted average square footage of a residential unit in the School District, which is 1,730 square feet. This calculation provides the average residential revenues from a residential unit of \$9,099 (1,760 x \$5.17). The average residential revenues from a residential unit multiplied by the Household Impacts per 1,000 square feet of commercial/industrial

development, as shown in Table 12, 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 17.

TABLE 17
Residential Fee Offsets

Commercial/Industrial Category	School District Households per 1,000 Square Feet Com./Ind.	Residential Fee per Unit	Residential Fee Offset per 1,000 Square Feet Com./Ind.
Banks	0.3198	\$9,099	\$2,910
Community Shopping Center	0.1737	\$9,099	\$1,580
Neighborhood Shopping Center	0.3167	\$9,099	\$2,882
Industrial Business Parks	0.3979	\$9,099	\$3,620
Industrial Parks/ Warehousing/Manufacturing	0.1525	\$9,099	\$1,388
Rental Self-Storage	0.0073	\$9,099	\$66
Research & Development	0.3441	\$9,099	\$3,131
Hospitality (Lodging)	0.1282	\$9,099	\$1,166
Commercial Offices (Standard)	0.5421	\$9,099	\$4,933
Commercial Offices (Large High Rise)	0.5143	\$9,099	\$4,680
Corporate Offices	0.3038	\$9,099	\$2,764
Medical Offices	0.4827	\$9,099	\$4,392

3. Net School Facilities Costs

Subtracting the Residential Fee Offset determined in Table 17 from the total school facilities costs listed in Table 16 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 18.

TABLE 18
Net School Facilities Costs Per 1,000 Square Feet Commercial/Industrial Development

Commercial/Industrial Category	Total School Facilities Cost Impact	Residential Fee Offset	Net School Facilities Cost Impact
Banks	\$3,909	\$2,910	\$999
Community Shopping Center	\$2,122	\$1,580	\$542
Neighborhood Shopping Center	\$3,873	\$2,882	\$991
Industrial Business Parks	\$4,862	\$3,620	\$1,242
Industrial Parks/ Warehousing/Manufacturing	\$1,864	\$1,388	\$476
Rental Self-Storage	\$91	\$66	\$25
Research & Development	\$4,206	\$3,131	\$1,075
Hospitality (Lodging)	\$1,565	\$1,166	\$399
Commercial Offices (Standard)	\$6,626	\$4,933	\$1,693
Commercial Offices (Large High Rise)	\$6,286	\$4,680	\$1,606
Corporate Offices	\$3,714	\$2,764	\$950
Medical Offices	\$5,901	\$4,392	\$1,509

The Net School Facilities Cost Impacts determined in Table 18 were then divided by 1,000 ⁷ to provide the cost impact on a square foot basis. These cost impacts are listed in Table 19.

TABLE 19
Net School Facilities Cost Impacts Per Square Foot of Commercial/Industrial Development

Commercial/Industrial Category	Net School Facilities Cost Impacts per Square Foot
Banks	\$1.00
Community Shopping Center	\$0.54
Neighborhood Shopping Center	\$0.99
Industrial Business Parks	\$1.24
Industrial Parks/ Warehousing/Manufacturing	\$0.48
Rental Self-Storage	\$0.02
Research & Development	\$1.08
Hospitality (Lodging)	\$0.40
Commercial Offices (Standard)	\$1.69
Commercial Offices (Large High Rise)	\$1.61
Corporate Offices	\$0.95
Medical Offices	\$1.51

The net school facilities cost impacts per commercial/industrial square shown in Table

⁷ The Employee Generation Rates derived from the SANDAG Traffic Study are estimated per 1,000 square feet of development.

19 are equal to or exceed the maximum authorized statutory school fee for commercial/industrial development of \$0.84 per square foot, except for the categories of Community Shopping Center, Industrial Parks/Warehousing/Manufacturing, Rental Self-Storage, and Hospitality (Lodging). Therefore, the School District is justified in levying school fees on commercial/industrial development in an amount up to but not exceeding the maximum authorized statutory fee, or the net cost impacts determined for the categories of Community Shopping Center, Industrial Parks/Warehousing/Manufacturing, Rental Self-Storage, and Hospitality (Lodging).

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 11, 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 \$0.84 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 Covenants, Conditions, and Restrictions (“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 V. 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 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 units 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.

Redevelopment projects featuring a transition in commercial/industrial categorical classification (e.g. a project redeveloping a Hospitality (lodging) into Commercial office (standard) space) should be assessed based on the Applicable School Fee for the new commercial/industrial category multiplied by the total assessable space of the new commercial/industrial project in the case of a complete site redevelopment. In the case where there is a partial redevelopment, or an addition to an existing development, the Applicable School Fee should be calculated on a basis of the marginal assessable space increase multiplied by the maximum Applicable School Fee for the assessable space.

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

SECTION VI. 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 School Fees described herein, 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, reconstruction or refurbishment of school facilities required to accommodate students generated by new residential and commercial/industrial development in areas of the School District where school facilities are needed;
- ii. Construction, reconstruction or refurbishment 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, adequate school facilities do not exist to accommodate students generated from new residential and commercial/industrial development in the areas of the School District where new development is anticipated. The fees imposed on such new development will be used to finance the acquisition of property and the construction, reconstruction and/or refurbishment 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 \$5.17 per square foot of residential development is justified as the fee is equal to or below the per square foot cost impacts 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 \$0.84 per square foot of commercial/industrial development is justified as the fee is 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 Community Shopping Center where a School Fee of \$0.54 per square foot is justified, Industrial Parks/Warehousing/Manufacturing where a School Fee of \$0.48 per square foot is justified, Rental Self-Storage where a School Fee of \$0.02 per square foot is justified, and Hospitality (Lodging) where a School Fee of \$0.40 per square foot is justified.

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.
Community Shopping Center	Shopping centers which sell merchandise and services to consumers. Include grocery stores, restaurants, retail centers, automotive sales. Community Shopping Centers have a total building square footage of 100,000 and more square feet of gross floor area
Neighborhood Shopping Center	Shopping centers which sell merchandise and services to consumers. Include grocery stores, restaurants, retail centers, automotive sales. Neighborhood Shopping Centers have a total building square footage of less than 100,000 square feet of gross floor area.
Industrial Business Parks	Include any combination of facilities engaged in manufacturing/assembly, warehousing, and/or storage with 15% or more of the total area designated for commercial use.
Industrial Parks/ Warehousing/Manufacturing	Include any combination of facilities engaged in manufacturing/assembly, warehousing, and/or storage with limited or no commercial use (less than 15% of the total area designated for commercial use).
Rental Self-Storage	Include warehouse developments which rent small storage vaults and often termed “mini-storage”.
Research & Development	Include scientific research and development laboratories, office and/or their supporting facilities.
Hospitality (Lodging)	Include establishments which provide lodging to the general public. Lodging types include hotels, motels, resort hotels and inns. The maximum term of occupancy for establishment within this category shall not exceed 30 days.
Commercial Offices (Standard) 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**

**TABLE B-1
Classroom Inventory**

School Level	School Site	Permanent Classrooms	Portable Classrooms	Total Classrooms	Special Use Classrooms	General Education Classrooms
Elementary School	Bemis	20	9	29	4	25
	Boyd	22	4	26	1	25
	Casey	22	11	33	2	31
	Curtis	30	0	30	3	27
	Dollahan	24	6	30	1	29
	Dunn	22	10	32	5	27
	Fitzgerald	26	0	26	3	23
	Garcia	26	2	28	0	28
	Henry	22	5	27	2	25
	Hughbanks	25	3	28	1	27
	Kelley	18	6	24	0	24
	Kordyak	39	0	39	6	33
	Morgan	18	10	28	1	27
	Morris	24	0	24	0	24
	Myers	20	5	25	1	24
	Preston	21	5	26	2	24
	Simpson	24	10	34	1	33
Trapp	24	0	24	0	24	
Werner	38	2	40	4	36	
ELEMENTARY SCHOOL TOTALS		465	88	553	37	516
Middle School	Frisbie	36	13	49	3	46
	Jehue	48	6	54	3	51
	Kolb	39	8	47	3	44
	Kucera	43	0	43	4	39
	Rialto	59	0	59	5	54
MIDDLE SCHOOL TOTALS		225	27	252	18	234
High School	Carter	114	0	114	6	108
	Eisenhower	72	9	81	9	72
	Rialto	116	4	120	7	113
	Milor/Zupanic	0	23	23	5	18
HIGH SCHOOL TOTALS		302	36	338	27	311
Total		992	151	1,143	82	1,061

**TABLE B-2
Classroom Building Capacity Determination**

Description	General Education			Non Severe ¹	Severe	Total
	TK-6	7-8	9-12			
I. Total Classroom Inventory	516	234	311	82	-	1,143
II. Permanent Classrooms						992
III. Portable Classrooms						151
IV. 25% of Permanent Classrooms						248
V. Adjustment (III. Minus IV.)	-	-	-	-	-	-
IV. Total (I. minus V.)	516	234	311	82	-	1,143
Building Capacity ²	12,900	6,318	8,397	1,066	-	28,681

¹ All Special Use Classrooms have been categorized as Non-Severe.

² School capacities are determined based on loading factors of 25 pupils per classroom for grades TK through 6, 27 pupils per classroom for grades 7 through 12, 13 pupils per classroom for Special Use Class.

**TABLE B-3
Classroom Building Capacity by School Levels**

Description	TK-6	7-8	9-12	Total
General Education	12,900	6,318	8,397	27,615
Proration of Non Severe Capacity	498	244	324	1,066
Proration of Severe Capacity	-	-	-	-
Total Building Capacity	13,398	6,562	8,721	28,681

APPENDIX C
ENROLLMENT SUMMARY

**RIALTO UNIFIED SCHOOL DISTRICT
2023/2024 ENROLLMENT
APPENDIX C**

Enrollment														
School Name	Elementary					Middle			High				Grand Total	
	TK/K	1	2	3	4	5	6	7	8	9	10	11		12
Bemis Elementary	102	106	94	82	80	91	0	0	0	0	0	0	0	555
Boyd Elementary	90	112	101	86	96	90	0	0	0	0	0	0	0	575
Carter High School	0	0	0	0	0	0	0	0	0	516	518	512	478	2,024
Casey Elementary	121	86	69	91	86	117	0	0	0	0	0	0	0	570
Curtis Elementary	150	106	112	99	107	97	0	0	0	0	0	0	0	671
Dollahan Elementary	154	86	108	90	97	88	0	0	0	0	0	0	0	623
Dunn Elementary	152	95	100	102	87	74	0	0	0	0	0	0	0	610
Eisenhower High School	0	0	0	0	0	0	0	0	0	542	563	532	509	2,146
Fitzgerald Elementary	75	46	69	79	65	71	0	0	0	0	0	0	0	405
Frisbie Middle School	0	0	0	0	0	0	312	321	303	0	0	0	0	936
Garcia Elementary	127	90	86	108	101	110	0	0	0	0	0	0	0	622
Henry Elementary	72	59	72	74	51	75	0	0	0	0	0	0	0	403
Hughbanks Elementary	87	63	64	63	76	81	0	0	0	0	0	0	0	434
Jehue Middle School	0	0	0	0	0	0	505	484	471	0	0	0	0	1,460
Kelley Elementary	101	110	102	134	125	94	0	0	0	0	0	0	0	666
Kolb Middle School	0	0	0	0	0	0	295	309	294	0	0	0	0	898
Kordyak Elementary	160	110	103	95	97	112	0	0	0	0	0	0	0	677
Kucera Middle School	0	0	0	0	0	0	304	361	301	0	0	0	0	966
Milor High School	0	0	0	0	0	0	0	0	0	0	0	25	168	193
Morgan Elementary	94	72	67	78	66	89	0	0	0	0	0	0	0	466
Morris Elementary	101	90	92	111	118	97	0	0	0	0	0	0	0	609
Myers Elementary	83	64	71	91	80	74	0	0	0	0	0	0	0	463
Preston Elementary	126	74	64	73	82	87	0	0	0	0	0	0	0	506
Rialto High School	0	0	0	0	0	0	0	0	0	652	758	659	671	2,740
Rialto Middle School	0	0	0	0	0	0	343	359	383	0	0	0	0	1,085
Simpson Elementary	144	89	101	102	110	89	0	0	0	0	0	0	0	635
Trapp Elementary	86	81	81	104	92	99	0	0	0	0	0	0	0	543
Werner Elementary	112	118	111	110	118	111	0	0	0	0	0	0	0	680
Zupanic Virtual Academy	7	4	9	6	1	9	10	19	28	19	22	33	40	207
GRAND TOTAL	2,144	1,661	1,676	1,778	1,735	1,755	1,769	1,853	1,780	1,729	1,861	1,761	1,866	23,368
TOTAL BY SCHOOL LEVEL						10,749			5,402				7,217	23,368
ADJUSTED FOR CAPACITY ANALYSIS ¹							12,518		3,633				7,217	23,368

APPENDIX D STUDENT GENERATION RATES

Student Generation Rates (“SGRs”) used in this Study are based on student enrollment address information from the School District, as of October 2023.

The student enrollment address information was matched to the address (situs) information from the property characteristic/GIS data. The number of students matched was then queried by school level and residential category. Students could not be matched if they were inter-district or if they did not have a valid physical address (e.g. only P.O. Box was listed). Mobile homes are not considered in the SGR determination, and therefore have been omitted. The number of students matched, at each residential category and school level, was then divided by unit counts obtained from the U.S. Census Bureau, yielding the SGRs. This determination of the SGRs is summarized in Tables D-1 through D-3.

**TABLE D-1
Student Generation Rates**

School Level	SFD Units	MFA Units
Elementary School (TK-5)	0.3064	0.2940
Middle School (6-8)	0.1517	0.1432
High School (9-12)	0.2043	0.1805
Total	0.6624	0.6177

**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)	7,396	24,136	0.3064
Middle School (6-8)	3,661	24,136	0.1517
High School (9-12)	4,930	24,136	0.2043
Total	15,987	NA	0.6624

¹ Obtained from the U.S. Census Bureau’s 2022 American Community Survey 5-Year Estimates

**TABLE D-3
Multi Family Attached (MFA) Student Generation Rates**

School Level	No. of Students Matched	Total Units ¹	Student Generation Rate
Elementary School (TK-5)	1,969	6,698	0.2940
Middle School (6-8)	959	6,698	0.1432
High School (9-12)	1,209	6,698	0.1805
Total	4,137	NA	0.6177

¹ Obtained from the U.S. Census Bureau’s 2022 American Community Survey 5-Year Estimates

The student generation rates for each residential category listed in Table D-1 were blended into a single student generation rate for each school level based on the percentage allocation of Projected Units. The percentage allocations are shown in Table D-4

TABLE D-4
Allocation of Net Projected Units by Residential Category

Residential Category	Net Projected Units	Percentage Allocation
SFD	1,648	45.10%
MFA	2,006	54.90%
Total	3,654	100.00%

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)	0.2996
Middle School (6-8)	0.1470
High School (9-12)	0.1912
Total	0.6378