RESIDENTIAL AND COMMERCIAL/INDUSTRIAL DEVELOPMENT SCHOOL FEE JUSTIFICATION STUDY

FALLBROOK UNION ELEMENTARY SCHOOL DISTRICT

APRIL 25, 2024

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TABLE OF CONTENTS

EXHIBITS

EXECUTIVE SUMMARY

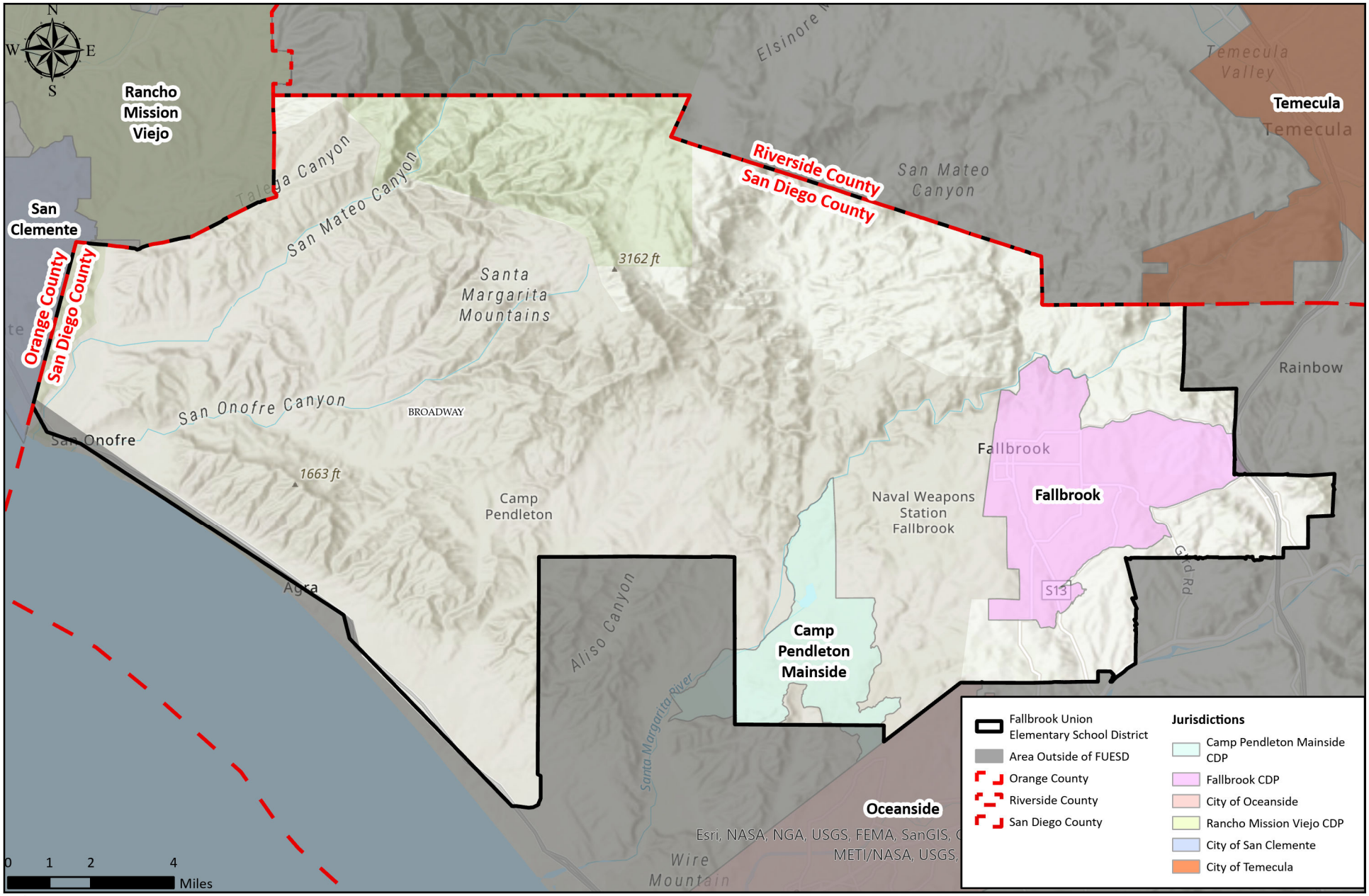
This Residential and Commercial/Industrial Development School Fee Justification Study ("Study") is intended to determine the extent to which a nexus can be established in the Fallbrook Union Elementary School District ("School District") between residential and commercial/industrial ("CID") development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

The School District provides education to students in grades transitional kindergarten ("TK") through 8 residing within a portion of the unincorporated County of San Diego ("County") (please see map on following page for a geographic profile of the School District). Collectively, the School District's school facilities in school year 2023/2024 have a capacity of 6,189 students based on information provided by the School District. Of these 6,189 seats, 4,732 are at the elementary school level (i.e., grades TK through 6) and 1,457 are at the junior high school level (i.e., grades 7 and 8). Please see Exhibit A for an updated school facilities capacity calculation. Based on data provided by the School District, student enrollment is 5,108 in school year 2023/2024. Comparing student enrollment to facilities capacity reveals that facilities capacity exceeds student enrollment at both school levels in school year 2023/2024 (please see Section IV for more information on student enrollment and facilities capacity).

To establish a nexus and a justifiable residential School Fee level, the Study evaluated the number and cost of new facilities required to house students generated from future residential development within the School District. Based on data provided by the San Diego Association of Governments ("SANDAG") approximately 1,188 additional residential units are expected be constructed within the School District's boundaries through calendar year 2050 ("Future Units"). Of these 1,188 Future Units, 699 are expected to be single family detached ("SFD") and 489 are expected to be multi-family attached ("MFA") units.

FALLBROOK UNION ELEMENTARY SCHOOL DISTRICT

GEOGRAPHIC PROFILE



March 2024

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To determine the impact on the School District from Future Units, the Study first multiplied the number of Future Units by the student generation factors ("SGFs") calculated by Woolpert (formerly Cooperative Strategies), to determine the projected student enrollment from Future Units. The results were that 233 unhoused elementary school students and 63 unhoused junior high school students are anticipated to be generated from Future Units ("Projected Unhoused Students").

To adequately house the Projected Unhoused Students, the School District will need to expand existing elementary school and junior high school facilities. Using design capacities of 25 students at the elementary school level and 27 students at the junior high school level, the School District will need to construct 10 new elementary school classrooms and three (3) new junior high school classrooms to accommodate the Projected Unhoused Students from the Future Units projected to be constructed at this time. The cost of expanding the existing elementary school and junior high school facilities by adding additional teaching stations is based on information provided in the School District's Master Plan.

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

TABLE ES-1

TOTAL SCHOOL FACILITIES COST IMPACTS (2024$)

School Levels	Cost Per Facility	Facilities Required/Students Generated	Total School Facilities Cost Impacts
Elementary School	$1,043,246	9.3200	$9,723,053
Junior High School	$1,043,246	2.3333	$2,434,206
Central Admin Impacts	$800	296	$236,800
Total	**N/A**	**N/A**	**$12,394,059**

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

TABLE ES-2

TOTAL SCHOOL FACILITIES COST IMPACTS PER RESIDENTIAL UNIT (2024$)

Land Use	Total School Facilities Cost Impacts	Future Units	School Facilities Cost Impacts per Residential Unit
Single Family Detached	$5,900,866	699	$8,442
Multi-Family Attached	$6,493,193	489	$13,279

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

TABLE ES-3

TOTAL SCHOOL FACILITIES COST IMPACTS PER RESIDENTIAL SQUARE FOOT (2024$)

Land Use	School Facilities Cost Impacts per Future Units	Average Square Footage	School Facilities Cost Impacts per Residential Square Foot
Single Family Detached	$8,442	2,163	$3.90
Multi-Family Attached	$13,279	1,350	$9.84

To determine the commercial/industrial School Fee levels that satisfy the rigorous nexus requirements of Assembly Bill ("AB") 181, the Study divides commercial/industrial development ("CID") into seven (7) land use categories: retail and services, office, research and development, industrial/warehouse/ manufacturing, hospital, hotel/motel, and self-storage.

The employment impacts of each of these land uses, in terms of the number of employees per 1,000 square feet of building space, are based on information from SANDAG pursuant to Section 17621 (e)(1)(B) of the Education Code. These employee impacts are shown in Table ES-4 on the following page.

TABLE ES-4

EMPLOYMENT IMPACTS PER 1,000 SQUARE FEET CID

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

Additional data from SANDAG, the U.S. Bureau of Census ("Census"), and Zillow provide a basis for estimating net school district household impacts. This number includes only those households occupying new housing units within the School District, as opposed to existing units whose previous occupants may have included school-aged children. Multiplying net school district households by (i) the number of students per household and (ii) total school facilities costs per student, results in estimates of school facilities cost impacts. Collectively, this calculation represents the total school facilities cost impacts per 1,000 square feet of commercial/industrial floor space, expressed in 2024 dollars. These results are summarized in Table ES-5.

TABLE ES-5

GROSS SCHOOL FACILITIES COSTS IMPACTS PER HOUSEHOLD (2024$)

School Level	Total Student Generation Impacts	Cost per Student	Gross School Facilities Costs Impacts per Unit
Elementary School	0.0163	$42,530	$693.24
Junior High School	0.0030	$39,438	$118.31
Impact per Household	**N/A**	**N/A**	**$811.55**

The revenue component of the Study estimates the potential fee revenues generated by CID, including residential fees paid by CID related households, as well as CID School Fees. CID related residential revenues are calculated based on the proposed residential School Fee of $3.45 per square foot, justified in this Study. The residential revenues per household are then subtracted from the impact per household listed above. This results in net impact per household, as summarized in Table ES-6.

TABLE ES-6

NET SCHOOL FACILITIES COST IMPACTS PER HOUSEHOLD (2024$)

Item	Amount
Impact per Household	$811.55
Residential Revenue Per Household	$42.89
Net School Facilities Cost Impacts Per Household	**$768.66**

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

TABLE ES-7

NET SCHOOL FACILITIES COST IMPACTS PER SQUARE FOOT (2024$)

School Level	Net Impact per Household	Square Feet per Employee	Cost Impact per Square Foot Of CID
Retail and Services	$768.66	447	$1.720
Office	$768.66	286	$2.688
Research and Development	$768.66	329	$2.336
Industrial/Warehouse/Manufacturing	$768.66	371	$2.072
Hospital	$768.66	360	$2.135
Hotel/Motel	$768.66	883	$0.871
Self-Storage	$768.66	15,552	$0.049

On January 24, 2024, the SAB increased the maximum Residential and CID School Fees authorized by Section 17620 of the Education Code from $4.79 to $5.17 per residential building square foot, and from $0.78 to $0.84 per CID square foot for unified school districts.

Based on the School District's fee sharing agreement with the Fallbrook Union High School District ("FUHSD"), the School District can collect 66.67 percent, or $3.45 per square foot, for all new Future Units built within its boundaries. Since the School District's share of the current maximum School Fee is less than the school facilities cost impacts per square foot, as shown in Table ES-3, the School District is fully justified in levying $3.45 per square foot for all new residential development within its boundaries, which represents its portion of the maximum residential School Fee subject to the limitations under the law.

The maximum the School District can receive from new CID is approximately 66.67 percent of the School Fees, or $0.56 per square foot of CID constructed within its boundaries. Justification of the CID School Fee is based on a comparison of cost impacts per CID square foot, as shown in Table ES-7, against the maximum CID Fee per square foot as noted above. As shown in Table ES-8, the School District is justified in levying:

TABLE ES-8

MAXIMUM SCHOOL FEE PER SQUARE FOOT OF CID

CID Land Use Category	Maximum School Fee
Retail and Service	$0.560
Office	$0.560
Research and Development	$0.560
Industrial/Warehouse/Manufacturing	$0.560
Hospitals	$0.560
Hotel/Motel	$0.560
Self-Storage	$0.049

INTRODUCTION

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

1. Issuance of State general obligation bonds in an amount not to exceed $9.2 billion;
2. Reformation of the State School Facility Program; and
3. Reformation of the School Fee collection procedure, amounts and options, including the ability of districts to levy alternative school fees in excess of statutory school fees, upon meeting certain conditions.

Since the adoption of SB 50, later legislation and voter initiatives created additional revenue to fund the State School Facility Program, but the basic requirements associated with the levy of School Fees has remained largely the same. School districts must still rely on School Fees as a funding source for school facilities required by new development. However, before a school district may levy School Fees on new development, State law requires that certain nexus findings must be made and documented. The objective of this Study is to provide a rigorous basis for such findings.

LEGISLATION

State legislation, provides guidelines, procedures, and restrictions on the levy of School Fees for school facilities. Below are summaries of some of the key pieces of legislation enacted over time that inform the analysis contained in this Study.

A. AB 2926

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

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

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

B. AB 1600

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

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

3. Determine that there is a reasonable relationship between the need for public facilities and the type of development on which a fee is imposed.

4. Determine that there is a reasonable relationship between the amount of the fee and the public facility or portion of the public facility attributable to the development on which the fee is imposed.

5. Provide an annual accounting of any portion of the fee remaining unexpended, whether committed or uncommitted, in the School District's accounts five or more years after it was collected.

In other words, the law limits the ability of a school district to levy School Fees unless (i) there is a need for the School Fee revenues generated and (ii) there is a nexus or relationship between the need for School Fee revenues and the type of development project on which the School Fee is imposed. The Study will provide information necessary to establish such a nexus between School Fees and residential development.

C. AB 181

AB 181, enacted by the State in 1989, created additional requirements and procedures for imposing School Fees and other conditions on new development. Specifically, AB 181 imposed more stringent nexus requirements on school districts that wish to levy School Fees on CID, as follows:

1. In order to levy a School Fee on CID, a formal study must be conducted to determine the impact of "the increased number of employees anticipated to result" from new CID on the "cost of providing school facilities within the School District."

2. Only that portion of the School Fee justified by the "nexus findings" contained in this study may be levied. Nexus findings must be made on an individual project basis or on the basis of categories of CID and must "utilize employee generation estimates that are based on commercial/industrial factors within the school district." Categories to be evaluated may include, but are not limited to, office, retail, transportation, communications and utilities, light industrial, heavy industrial, research and development, and warehouse uses.

3. Starting in 1990, maximum School Fees for residential and CID will be subject to increases every two (2) years rather than annually.

4. An appeals procedure shall be established whereby the levy of School Fees on a commercial/industrial project may be appealed to the governing board of a school district. Grounds for an appeal must include, but are not limited to, improper project classification by commercial/industrial category, or the application of improper or inaccurate employee or student generation factors to the project.

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

D. AB 602

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 phrase or metric to measure 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. The California Department of Education (CDE) envisions school facilities that "enhance the achievement of all students and are learner-centered, safe, sustainable, and centers of the community."

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 already addresses the requirements of AB 602.

METHODOLOGY OF STUDY

Woolpert is projecting an increase in student enrollment attributable to new development in future years. This projected growth will create a demand for new, expanded or refurbished school facilities to be constructed within the School District and the need to incur significant school facilities costs to meet that demand. As a result, the School District has determined that School Fees should be levied on new development projects. The objective of the Study is to provide a basis for such findings consistent with the requirements of AB 2926, AB 1600, AB 1818, AB 602 and the provisions of Section 66001 et seq. of the Government Code.

A. RESIDENTIAL METHODOLOGY

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

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

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

B. COMMERCIAL/INDUSTRIAL METHODOLOGY

Woolpert has also determined that School Fees must be levied on new CID projects. In order to determine the nexus relationships identified in AB 181, the Study analyzes the various linkages between CID and

(i) the need for school facilities, (ii) the cost of school facilities, and (iii) the amount of the School Fee that can justifiably be levied. The primary connections or linkages include the following:

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

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

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

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

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

C. COMMERCIAL/INDUSTRIAL LAND USE CATEGORIES

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

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

RETAIL AND SERVICES

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

OFFICE

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

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

RESEARCH AND DEVELOPMENT

Research and development facilities are those primarily associated with the application of scientific research to the development of high technology products. Areas of concentration include materials, science, computer, electronic, and telecommunications products.

Facilities may also contain offices and fabrication areas. Activities performed range from pure research to product development, testing, assembly, and distribution.

INDUSTRIAL/WAREHOUSE/MANUFACTURING

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

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

HOSPITAL

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

HOTEL/MOTEL

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

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

SELF-STORAGE

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

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

FACILITIES CAPACITY AND STUDENT ENROLLMENT

In order to determine whether the School District's existing school facilities contain excess capacity to house students generated by new residential and CID development, school year 2023/2024 student enrollment and school facilities capacity of the School District were evaluated.

Collectively, the School District's school facilities in school year 2023/2024 have a capacity of 6,189 students based on information provided by the School District. Of these 6,189 existing seats, 4,732 are at the elementary school level and 1,457 are at the junior high school level. Please see Exhibit A for an updated school facilities capacity calculation. The enrollment of the School District in school year 2023/2024 is 5,108 students. As shown in Table 1, the School District's facilities capacity exceeds student enrollment at the both school levels in school year 2023/2024.

TABLE 1

EXISTING SCHOOL FACILITIES CAPACITY AND STUDENT ENROLLMENT

School Level	2023/2024 Facilities Capacity	2023/2024 Student Enrollment	Excess/ (Shortage) Capacity
Elementary School (Grades TK-6)	4,732	4,118	614
Junior High School (Grades 7-8)	1,457	990	467
Total	**6,189**	**5,108**	**1,081**

As indicated in Table 1, 614 elementary school seats and 467 junior high school seats are available to accomodate students generated from Future Units. Because the School District has two (2) elementary schools located on a military base and the facilities capacity at those two locations are not available to house student enrollment from Future Units, any surplus seats available at those school sites are reserved for students who reside on the military base. Therefore, no additional facilities capacity is available to house Projected Unhoused Students from Future Units.

IMPACT OF RESIDENTIAL DEVELOPMENT ON SCHOOL FACILITIES NEEDS

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

A. PROJECTED RESIDENTIAL DEVELOPMENT WITHIN THE SCHOOL DISTRICT

The initial step in developing a nexus as required by the law is to determine the number of Future Units to be constructed within the School District's boundaries. Based on information provided by SANDAG, the School District expects the construction of approximately 1,188 Future Units through calendar year 2050. Of these 1,188 Future Units, 699 are expected to be SFD units and 489 are expected to be MFA[1] units. Table 2 distinguishes Future Units by land use.

TABLE 2

FUTURE UNITS

Land Uses	Total Future Units
Single Family Detached	699
Multi-Family Attached	489
Total Units	**1,188**

[1]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.

B. RECONSTRUCTION

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

B1. RESIDENTIAL RECONSTRUCTION

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

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

B2. RECONSTRUCTION OF COMMERCIAL/INDUSTRIAL CONSTRUCTION INTO RESIDENTIAL CONSTRUCTION

CID Reconstructon refers to the voluntary demolition of existing commercial/industrial buildings and replacement of them with new residential development, and is a different category of Reconstruction. Woolpert is aware that such types of Reconstruction may occur within the School District in the future; however, Woolpert was unable to find information (i) about the amount planned within the School District in the future or (ii) historical levels, which might indicate the amount to be expected in the future.

Due to the lack of information, the School District will evaluate the impacts of CID Reconstruction projects on a case-by-case basis and will make a determination of whether a fee credit is justified based on the nature of the project.

C. STUDENT GENERATION FACTORS PER RESIDENTIAL UNIT

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

Sorting and extracting the County Assessor records by land use, Woolpert developed a database of 10,415 SFD units. This database was then compared with the School District's student enrollment database to identify address matches. Upon comparison of the two (2) databases, 1,918 student matches were found, resulting in the SGFs shown in Table 3.

TABLE 3

STUDENT GENERATION FACTORS FOR SINGLE FAMILY DETACHED UNITS

School Level	Students Matched	Single Family Detached Units	Student Generation Factors
Elementary School	1,501	10,415	0.1441
Junior High School	417	10,415	0.0400
Total	**1,918**	**N/A**	**0.1841**

A procedure identical to the one used in calculating the SGFs for SFD units was used to determine SGFs for MFA units. A total of 1,318 students matched to the MFA database which consisted of 4,529 units. The resulting SGFs for MFA units are shown in Table 4.

TABLE 4

STUDENT GENERATION FACTORS FOR MUTLI-FAMILY ATTACHED UNITS

School Level	Students Matched	Multi-Family Attached Units	Student Generation Factors
Elementary School	1,046	4,529	0.2310
Junior High School	272	4,529	0.0601
Total	**1,318**	**N/A**	**0.2911**

However, due to incomplete and incorrect address information in both the student enrollment and residential databases, Woolpert was unable to match all of the School District's students. The results are SGFs that understate the number of students generated by SFD and MFA units. After accounting for incoming interdistrict students that reside outside of the School District's boundaries, as well as students residing within the Marine Corps Base Camp Pendleton, there were 318 unmatched students.

Therefore, Woolpert adjusted the SGFs listed in Tables 3 and 4 based on a rate which considers the number of students successfully matched to a school level and land use. The adjusted SGFs for each land use by school level are shown in Table 5.

TABLE 5

ADJUSTED STUDENT GENERATION FACTORS

School Levels	Single Family Detached Units	Multi-Family Attached Units
Elementary School	0.1573	0.2522
Junior High School	0.0437	0.0654
Total	**0.2010**	**0.3175**

D. SCHOOL DISTRICT FACILITIES REQUIREMENTS

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

TABLE 6

PROJECTED STUDENT ENROLLMENT FROM FUTURE UNITS

School Level	Projected Student Enrollment from Future SFD Units	Projected Student Enrollment from Future MFA Units	Projected Student Enrollment from Future Units
Elementary School	110	123	233
Junior High School	31	32	63
Total	**141**	**155**	**296**

To determine the number of elementary school and junior high school facilities necessary to adequately house the Projected Unhoused Students, Woolpert divided the Projected Unhoused Students by the estimated school facilities capacity at each school level, as provided by the School District. The additional school facilities requirements are identified in Table 7 on the following page.

TABLE 7

ADDITIONAL SCHOOL FACILITIES FOR PROJECTED UNHOUSED STUDENTS

School Levels	Projected Unhoused Students	Estimated Facilities Capacity	Additional Facilities Needed
Elementary School	233	25	9.3200
Junior High School	63	27	2.3333

E. SCHOOL DISTRICT FACILITIES COSTS

The cost of expanding the existing elementary school and junior high school facilities by adding additional teaching stations is based on information provided in the School District's Master Plan. It must be noted that the facilities costs are in 2024 dollars and do not include interest costs associated with debt incurred to finance the construction of facilities. The estimated site costs and facility construction costs by school level are shown in Table 8.

TABLE 8

ESTIMATED SCHOOL FACILITIES COSTS (2024$)

School Levels	Estimated Total Cost per Facility
Elementary School	$1,043,246
Junior High School	$1,043,246

The costs in Table 8 do not include costs associated with Central Administrative and Support Facilities. As indicated in Table 7, Future Units will cause the enrollment of the School District to increase by approximately 296 students. The SAB-approved standard for Central Administrative and Support Facilities requires approximately four (4) square feet of central administrative and support facilities for every student.

Based on this report and the estimated cost per square foot to construct and furnish these types of facilities, the Study incorporates a Central Administrative and Support Facilities cost impact of $800 per student.

F. TOTAL SCHOOL FACILITIES COST IMPACTS

To determine the total school facilities cost impacts caused by Future Units, Woolpert (i) multiplied the school facilities costs (Table 8) by the additional school facilities needed (Table 7) and (ii) multiplied the central administrative and support facilities costs per student (above paragraph) by the Projected Unhoused Students (Table 6). Table 9 illustrates the total school facilities cost impacts from future residential development.

TABLE 9

TOTAL SCHOOL FACILITIES COST IMPACTS FROM FUTURE UNITS (2024$)

Item	Cost per Facility/	Facilities/ Students Generated	Total School Facilities Cost Impacts
Elementary School	$1,043,246	9.3200	$9,723,053
Junior High School	$1,043,246	2.3333	$2,434,206
Central Admin Impacts	$800	296	$236,800
Total	**N/A**	**N/A**	**$12,394,059**

G. SCHOOL FACILITIES COST IMPACTS PER RESIDENTIAL UNIT

To determine the total school facilities cost impacts per future residential unit, the total school facilities cost impacts listed above need to first be apportioned by land use based on the number of elementary and junior high school students to be generated from such land use. Table 10 on the following page shows total school facilities cost impacts by land use.

TABLE 10

TOTAL SCHOOL FACILITIES COST IMPACTS BY LAND USE (2024$)

School Level	Single Family Detached Units	Multi-Family Attached Units	Total School Facilities Cost Impacts
Elementary School	$4,678,283	$5,231,170	$9,909,453
Junior High School	$1,222,584	$1,262,022	$2,484,606
Total	**$5,900,866**	**$6,493,193**	**$12,394,059**

Total school facilities cost impacts for each land use were then divided by the number of Future Units in such land use to determine school facilities cost impacts per SFD unit and MFA unit. These impacts are shown in Table 11.

TABLE 11

SCHOOL FACILITIES COST IMPACTS PER FUTURE UNIT (2024$)

Land Uses	Total School Facilities Cost Impacts	Future Units	School Facilities Cost Impacts per Residential Unit
Single Family Detached	$5,900,866	699	$8,442
Multi-Family Attached	$6,493,193	489	$13,279

H. SCHOOL FACILITIES COST IMPACTS PER SQUARE FOOT

To determine the school facilities cost impacts per square foot of residential construction for each land use, the school facilities cost impacts per unit listed in Table 11 were divided by the average square footage of such type of residential unit. Using square footage information from Zillow for units constructed within the School District. Woolpert estimates that the average square footage of an SFD unit in the School District is projected to be 2,163 square feet while the average square footage of an MFA unit is projected to be 1,350 square feet. Table 12 on the following page shows the school facilities cost impacts per square foot of residential construction in the School District.

TABLE 12

SCHOOL FACILITIES COST IMPACTS PER RESIDENTIAL SQUARE FOOT (2024$)

Land Uses	School Facilities Cost Impacts per Residential Unit	Average Square Footage	School Facilities Cost Impacts per Square Foot
Single Family Detached	$8,442	2,163	$3.90
Multi-Family Attached	$13,279	1,350	$9.84

IMPACT OF COMMERCIAL/INDUSTRIAL DEVELOPMENT ON SCHOOL FACILITIES NEEDS

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

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

A. EMPLOYMENT IMPACTS

As indicated in Section III, employment impacts for different CID categories equal the estimated number of on-site employees generated per 1,000 square feet of commercial/industrial floor space, which are referred to in the Study as CID Land Use Categories. Consistent with the provisions of Section 17621(e)(1)(B) of the Education Code, employment impacts for each category are based on data from SANDAG. The employment impacts are shown in Table 13.

TABLE 13

EMPLOYMENT IMPACTS PER 1,000 SQUARE FEET (2024$)

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

B. HOUSEHOLD IMPACTS

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

1. Households per Employee

   The average number of households per employee are calculated based on information obtained from the Census. Based on this information, the total household impacts are 0.8603 households per employee within the School District.

2. Employed Persons Living within the School District

   In order to determine the number of employed persons who live within the School District, Woolpert utilized data from the Census. Based on this data, approximately 56.8 percent of the employed persons within the School District are estimated to live within the School District. This trend is expected to increase as new residential and CID projects are approved and additional homes and jobs are created within the School District.

3. Propensity to Occupy New Homes

   The propensity to occupy new housing within the general area of the School District helps determine the number of employees generated from new homes. Based on data on recent resales and new home sales obtained from Zillow, new home sales in the School District were estimated to equal 1.40 percent of the total housing units which will experience occupant turnover.

4. Total Household Impact

   In order to determine the Total Household Impact of new residential units, the Study multiplied the average employed persons per household, employed person living within the School District, and the propensity to occupy new homes. This helps determine the number of new employees coming to live and work within the School District produced by new residential development, as shown in Table 14 on the following page.

TABLE 14

TOTAL HOUSEHOLD IMPACTS FROM NEW CID

Household Impact	Factor
Households per Employees	0.8603
Employees Living within the School Districts	56.80%
Households with Employees Working within the School District	**0.4887**
Propensity to Occupy New Homes	1.40%
Total Household Impacts	**0.0068**

C. STUDENT GENERATION IMPACTS

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

1. RESIDENTIAL STUDENT GENERATION IMPACTS

In order to analyze household formation as a result of new CID, the SGFs shown in Table 5 must be blended. To blend the SGFs of the two (2) land uses into a single SGF for each school level, the land uses were weighted in proportion to each type's percentage of the future residential units to be constructed within the School District. Applying these weighting factors yields the following blended SGFs shown in Table 15.

TABLE 15

BLENDED STUDENT GENERATION FACTORS

School Level	Student Generation Factors
Elementary School	0.1963
Junior High School	0.0526

2. TOTAL STUDENT GENERATION IMPACTS

Multiplying total household impacts shown in Table 14 by the blended SGFs shown in Table 15 results in the average student generation impacts. These average student generation impacts are shown by school level in Table 16 on the following page.

TABLE 16

AVERAGE STUDENT GENERATION IMPACTS

School Level	Student Generation Factors	Total Household Impacts	Average Student Generation Impacts
Elementary School	0.1963	0.0068	0.0013
Junior High School	0.0526	0.0068	0.0004

D. INTER-DISTRICT TRANSFER IMPACTS

The Study also evaluates the impact of students attending the School District on an inter-district transfer basis. The inter-district transfer rate is determined by calculating the ratio of student transfers into the School District's schools by the number of persons employed within its boundaries. Based on information provided by the School District, total student transfers into the School District's schools for school year 2023/2024 total 168 at the elementary school level and 29 at the junior high school level. Employment within the School District's area is estimated at 11,225 persons based on employment estimates provided by SANDAG. Table 17 shows the inter-district transfer impacts by school level.

TABLE 17

INTER-DISTRICT TRANSFER IMPACTS

School Level	Inter-District Transfer Impacts
Elementary School	0.0150
Junior High School	0.0026

E. TOTAL STUDENT GENERATION IMPACT

To determine the total student generation impacts of CID on the School District, the average student generation impacts from Table 16 are added to the inter-district transfer impacts from Table 17. The resulting total student generation impacts are displayed in Table 18 on the following page.

TABLE 18

TOTAL STUDENT GENERATION IMPACTS

School Level	Average Student Generation Impacts	Inter-District Transfer Impacts	Total Student Generation Impacts
Elementary School	0.0013	0.0150	0.0163
Junior High School	0.0004	0.0026	0.0030

F. GROSS SCHOOL FACILITIES COST IMPACTS

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

1. SCHOOL FACILITIES COSTS PER STUDENT

The school facilities costs per student are the average cost impact produced by students generated from Future Units. This impact estimate is derived from the school facilities costs (Table 10) divided by the Projected Student Enrollment from Future Units (Table 6) by school level. Multiplying the total student generation impacts by the school facilities costs per student results in the gross school facilities cost impacts shown in Table 19.

TABLE 19

GROSS SCHOOL FACILITIES COSTS IMPACTS PER STUDENT (2024$)

School Level	Total Student Generation Impacts	Cost per Student	Gross School Facilities Costs Impacts per Student
Elementary School	0.0163	$42,530	$693.24
Junior High School	0.0030	$39,438	$118.31
Total	**N/A**	**N/A**	**$811.55**

G. FEE REVENUES

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

1. RESIDENTIAL REVENUES AND NET SCHOOL FACILITY COSTS

Residential revenues equal the maximum revenues from residential development associated with each school level. These revenues are derived from the School District's proposed School Fee of $3.45 per square foot multiplied by the School District's weighted average square footage for residential units of 1,828 square feet. Based on this calculation, the residential revenues per unit in the School District are estimated to be $6,307. Multiplying the total household impact shown in Table 14 by residential revenues results in the residential revenues per student shown in Table 20.

TABLE 20

RESIDENTIAL REVENUES PER HOUSEHOLD (2024$)

Item	Amount
Revenue per Residential Unit	$6,307
Total Household Impact	0.0068
Residential Revenue per Household	**$42.89**

2. NET SCHOOL FACILITIES COST IMPACTS

In order to calculate the net school facilities cost impacts per grade level, the residential revenues shown in Table 20 were subtracted from the gross school facilities cost impacts shown in Table 19. The results are the net school facilities cost impacts that must be funded by CID School Fees, as shown in Table 21.

TABLE 21

NET SCHOOL FACILITIES COST IMPACTS PER HOUSEHOLD (2024$)

Item	Amount
Gross School Facilities Cost Impacts per Household	$811.55
Residential Revenue per Household	$42.89
Net School Facilities Cost Impacts per Household	**$768.66**

H. JUSTIFICATION OF COMMERCIAL/INDUSTRIAL SCHOOL FEES

Dividing net school facilities cost impacts shown in Table 21 by total the square feet per employee for each land use category, as shown in Table 13, results in the CID impacts shown in Table 22.

TABLE 22

EMPLOYMENT IMPACTS PER 1,000 SQUARE FEET

CID Land Use Category	Net Impact per Household	Square Feet per Employee	Cost Impact per Square Foot Of CID
Retail and Services	$768.66	447	$1.720
Office	$768.66	286	$2.688
Research and Development	$768.66	329	$2.336
Industrial/Warehouse/Manufacturing	$768.66	371	$2.072
Hospital	$768.66	360	$2.135
Hotel/Motel	$768.66	883	$0.871
Self-Storage	$768.66	15,552	$0.049

CONCLUSION

On January 24, 2024, the SAB increased the maximum Residential and CID School Fees authorized by Section 17620 of the Education Code from $4.79 to $5.17 per residential building square foot, and from $0.78 to $0.84 per CID square foot for unified school districts.

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

1. RESIDENTIAL FEES

Based on the School District's fee sharing agreement with FUHSD, the School District can collect 66.67 percent, or $3.45 per square foot, for all new Future Units built within its boundaries. Since the School District's share of the current maximum School Fee is less than the school facilities cost impacts per square foot, as shown in Table 14, the School District is fully justified in levying $3.45 per square foot for all new residential development within its boundaries, which represents its portion of the maximum residential School Fee, subject to the limitations under the law.

Based on this information, the School District is justified in charging the Statutory Fee Amounts per square foot shown in Table 23 on new residential construction:

TABLE 23

MAXIMUM JUSTIFIED STATUTORY RESIDENTIAL FEE PER SQUARE FOOT (2024$)

Item	Residential Fee per Square Foot
Single Family Detached	$3.45
Multifamily Attached	$3.45

2. COMMERCIAL/INDUSTRIAL FEES

Pursuant to the School District's revenue sharing agreement FUHSD, the maximum the School District can receive from new CID is approximately 66.67 percent of the School Fees, or $0.56 per square foot of CID constructed within its boundaries. Justification of the CID School Fee is based on a comparison of cost impacts per CID square foot, as shown in Table 22, against the maximum CID Fee per square foot as noted above.

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

TABLE 24

MAXIMUM JUSTIFIED STATUTORY CID FEE PER SQUARE FOOT (2024$)

CID Land Use Category	CID Fee per Square Foot
Retail and Services	$0.560
Office	$0.560
Research and Development	$0.560
Industrial/Warehouse/Manufacturing	$0.560
Hospital	$0.560
Hotel/Motel	$0.560
Self-Storage	$0.049

EXHIBIT A

UPDATED SCHOOL FACILITIES CAPACITY CALCULATION

Fallbrook Union Elementary School District

School Facilities Capacity Calculation

Application	Item	Elementary School	Middle School
N/A	William H. Frazier Elementary	564	
N/A	Live Oak Elementary	740	
N/A	Fallbrook STEM Academy	739	
N/A	La Paloma Elementary	590	
N/A	Maie Ellis Elementary	652	
N/A	Mike Choate Early Education Center	151	
N/A	San Onofre School TK-8	560	240
N/A	Mary Fay Pendleton TK-8	736	316
N/A	Potter Junior High		901
Total Capacity	**N/A**	**4,732**	**1,457**