



# Developer Fee Justification Study

## Wheatland School District

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## TABLE OF CONTENTS

EXECUTIVE SUMMARY .....	1
DEVELOPER FEE JUSTIFICATION: RESIDENTIAL DEVELOPMENT .....	4
Wheatland School District .....	4
Capacity and Enrollment.....	5
Projected Residential Development .....	5
Student Generation Rates.....	5
Projected School Facilities Needs .....	6
New Construction Cost vs. Modernization .....	7
DEVELOPER FEE JUSTIFICATION: COMMERCIAL/INDUSTRIAL PROJECTS .....	9
Commercial/Industrial Development Fee Calculations .....	9
SUMMARY AND FINDINGS.....	12
ADMINISTRATION OF THE FEES .....	13
Administrative Requirements .....	13
Reporting Requirements.....	13
Government Code Section 66001 (a) (1): Purpose of Fees.....	13
Government Code Section 66001 (a) (2): Use of Fees.....	13
Government Code Section 66001 (a) (3): Reasonable Relationship between the Fee's Use and the Type of Development Project on which the Fee is Imposed .....	14
Government Code Section 66001 (a) (4): Reasonable Relationship Between the Need for the Public Facility and the Type of Project Upon Which the Fee is Imposed .....	14
Government Code Section 66001 (b): Reasonable Relationship Between the Amount of the Fee and the Cost of the Public Facility.....	15
REVENUE SOURCES/FUNDING FACILITIES .....	16
State School Facility Program .....	16
General Obligation Bonds .....	16
Parcel Taxes .....	16
Mello-Roos Community Facilities Districts .....	16
RECOMMENDATIONS .....	17
SOURCES .....	18

## LIST OF TABLES

Table 1. District Capacities and Enrollments.....	5
Table 2. Student Generation Rates and Students Generated.....	6
Table 3. Housing Units and Calculation of Weighted Square Footage .....	7
Table 4. Cost per Student for New Construction .....	7
Table 5. District Total Modernization Need.....	8
Table 6. District Modernization Facilities Cost per Square Foot.....	8
Table 7. Commercial/Industrial Employee Generation Factors.....	10
Table 8. Commercial/Industrial Base Cost per Square Foot (Except Mini-Storage) .....	10
Table 9. Mini-Storage Base Cost per Square Foot .....	11

## EXECUTIVE SUMMARY

The Wheatland School District (“WSD” or the “District”) serves the City of Wheatland, California, and some surrounding areas of unincorporated Yuba County. The District serves a total of 1,495 K-8th grade students at one elementary school serving K-3, one elementary school serving K-5, one K-5 charter elementary school and one middle school (which serves grades 4-5 for the City of Wheatland as well).

In February 2022, the State Allocation Board’s biennial inflation adjustment changed the fee to \$4.79 per square foot for residential construction and \$0.78 per square foot for commercial/industrial construction. The District splits its collected developer fees with the Wheatland Union High School District, with WSD retaining 60% of the collected fee. The following Developer Fee Justification Study demonstrates the District is justified in collecting the statutory Level I residential and statutory commercial/industrial fees in the amounts specified above on future development within the District based on the following analysis:

- The District’s total enrollment at its school sites in 2021-22 was 1,495 students;
- Based on State loading standards, the District has a classroom capacity of 1,628 students;
- The City of Wheatland and Yuba County planning departments collectively estimate a total of 1,648 new residential units to be constructed over the next twenty years. These units will be a mix of single-family (1,500 units), and affordable (148 units);
- Based on information provided by the City of Wheatland and the County of Yuba it is estimated that the weighted average square footage of new homes will be 1,896 square feet;
- Based on a weighted average of single-family detached units constructed within the District and affordable units constructed in a “similar to” District in Yuba County, new residential units will generate 0.455 K-8th grade students per unit for the District to house;
- The 1,648 new units are projected to generate 750 K-8<sup>th</sup> grade students for the District to house;
- Many District facilities are over 25 years old and in need of modernization to continue housing existing students and students generated by new development at the existing level of service over the next 20 years;
- It is fiscally more prudent to extend the useful life of an existing facility than to construct new facilities when possible;
  - The cost to modernize facilities is approximately 41.1% of the cost to construct new facilities;
  - The total estimated cost to reconstruct and/or modernize facilities for the students generated from new development is \$25,765,500.
- Based on the cost of reconstructed school facilities, the impact equates to \$8.25 per square foot of residential development;
- All categories of commercial/industrial development except for mini-storage create a modernization cost to the District of \$2.65 per square foot;
- Mini-storage construction creates a cost of \$0.06 per square foot;
- The District is justified to adopt its 60% share of the statutory Level I Developer Fees, currently \$2.87 per square foot for residential construction and \$0.47 per square foot for commercial/industrial construction, except for mini-storage which should be charged at \$0.06 per square foot.

## DEVELOPER FEES: BACKGROUND

School districts are continually evaluating the condition of their capital facilities throughout their districts. Districts may use various sources of funds for these capital facility projects, including Developer Fees, State program funds, redevelopment funds, certificates of participation, sale of capital assets, and mitigation measures. In September 1986, the Governor signed into law Assembly Bill 2926 (Chapter 887/Statutes 1986), which granted school district governing boards the authority to impose developer fees. This authority is codified in Education Code Section 17620, et seq. which states in part "...the governing board of any school district is authorized to levy a fee, charge, dedication or other requirement against any construction within the boundaries of the district for the purpose of funding for the construction or reconstruction of school facilities."

School districts were provided a mechanism to assist in funding with the adoption of the Mitigation Fee Act (Government Code Section 66000 et seq.). This act governs the imposition of fees by a district as a condition of approval of a development project. In order to impose such a fee, a reasonable connection must exist between the new development and the construction and/or improvement of school facilities for which the fees are to be assessed.

Level I fees (also known as statutory fees) are adjusted every two years according to the inflation rate for Class B construction as determined by the State Allocation Board. With the passage of SB50 in 1998, a cap was placed on the amount that could be charged under the Level I fee calculation. The law allowed for adjustments of the cap as noted in Government Code Section 65995(b)(3), which specifies in part that "...fees shall be increased every two years, according to the adjustment for inflation set forth in the statewide cost index for Class B Construction, as determined by the State Allocation Board at its February meeting, which increase shall be effective as of the date of that meeting."

Level II developer fees are outlined in Government Code Section 65995.5 and allow a school district to impose a higher fee on residential construction only if certain conditions can be met and a study conducted to provide justification for the higher residential fee per square foot.

As of February 2022, Government Code Section 65995 authorizes school districts to collect Developer Fees on future development of no more than \$4.79 per square foot for residential construction and \$0.78 for commercial/industrial construction (Level I fees).

Pursuant to Government Code Section 66016.5 the District has prepared and will adopt this impact fee nexus study ("Study") supporting the increase in the District's existing Developer Fees by reviewing the assumptions supporting the original fee and the amount of fees collected in prior years and justifying the increase in those fees through valid methods of calculation. In making the findings required in Government Code Section 66001, as done in the final pages of this Study, the District demonstrates its compliance with Section 66016.5(a)(3).

The Study justifies the applicable fee increase through detailed calculations of the appropriate dollar amount proportional to the square footage of anticipated residential and commercial/industrial development within the District, pursuant to Government Code section 66015(5)(A), establishing the presumption that a valid method has been used to establish a reasonable relationship between the fee charged and the burden posed by the development.

The content of this Study will show that the Wheatland School District is justified in levying the statutory maximum Level I Developer Fee.

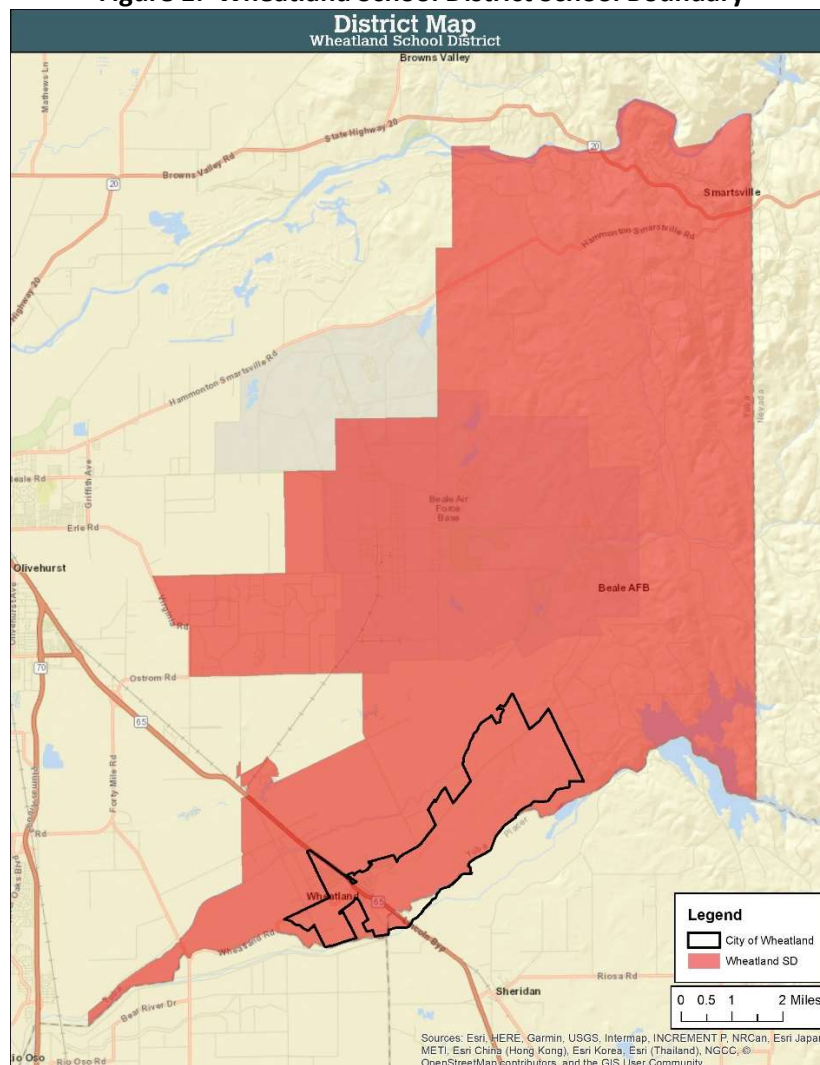
The Wheatland School District splits collected developer fees with the Wheatland Union High School District, retaining 60% of collected fees. Therefore, the maximum statutory fees WSD can collect are residential fees at a rate of \$2.87 per square foot and commercial/industrial fees at a rate of \$0.47 per square foot.

## DEVELOPER FEE JUSTIFICATION: RESIDENTIAL DEVELOPMENT

### Wheatland School District

The Wheatland School District serves the City of Wheatland, California and some surrounding areas of unincorporated Yuba County. The Wheatland School District was established in 1871, when the former Bear River School District was divided into Virginia and Wheatland School Districts. The town of Wheatland is valued by its residents for its small-town atmosphere and rural setting. Located in Northern California's Central Valley along State Route 65 in Yuba County, Wheatland is approximately one mile north of the Bear River and the tri-county boundary of Sutter, Placer, and Yuba Counties and 40 miles north of Sacramento. Beale Air Force Base is located eight miles to the northeast, and many students from the base's military families attend Wheatland School District schools. The District serves K-8th grade students and has one elementary school in Wheatland serving grades K-3, one elementary school near the air force base serving grades K-5, one K-5 charter elementary school, and one middle school (which serves grades 4-5 for the City of Wheatland as well). Figure 1 provides the location of the District's boundary.

**Figure 1. Wheatland School District School Boundary**



### Capacity and Enrollment

The District's capacity calculation utilizes State loading standards of 25 K-6<sup>th</sup> grade students per classroom, 27 7<sup>th</sup>-8<sup>th</sup> grade students per classroom, and 13 Non-Severe Special Day Class and 9 Severe Special Day Class students per classroom. Classroom counts are based on the District's documentation filed with the Office of Public School Construction as part of its New Construction eligibility establishment and updates. Table 1 outlines the capacity vs. the enrollments for the current school year, noting unused capacity.

**Table 1. District Capacities and Enrollments**

Capacity	21-22 Enrollments	Unused Capacity
1,628	1,495	133

### Projected Residential Development

Residential development generates students for the District to house in facilities, new and/or renovated. Therefore, it is imperative to research residential development to project growth and associated student generation within the District. According to the City of Wheatland, 48 affordable units may be constructed within the District over the next 20 years. Yuba County confirmed 1,500 single-family units and 100 affordable units may be constructed within the District over the next 20 years.

### Student Generation Rates

The average number of students generated by each housing unit provides a student generation rate or "yield factor". The number of students emanating from new housing units within the District's boundaries was assessed for the District by surveying recently constructed housing units in comparison with the 2021-2022 WSD student list to see how many students, by grade level, are generated by a new home. King Consulting surveyed 247 recently built single-family homes within WSD, which collectively generated 111 students, for a K-8th grade student generation rate of 0.449. There have been no affordable units recently constructed within the District boundary; therefore, the student generation rates for a school district located in Yuba County and "similar to" the Wheatland School District were utilized. King Consulting surveyed 306 affordable units, which generated 159 K-8<sup>th</sup> grade students for an affordable student generation rate of 0.520.

By using the numbers of each type of unit projected to be built in the District over the next 20 years, a weighted average is determined for their student generation rate. The number of students expected to be generated by each type of residential development are totaled and divided by the total number of all residential units to obtain this weighted average. This calculation is shown in Table 2. This weighted student generation rate can then be applied to the projected housing units to assist in determining the new students entering the District.



**Table 2. Student Generation Rates and Students Generated**

<b>Development Type</b>	<b>Projected Number of Units</b>	<b>Student Generation Rate</b>	<b>Expected Students Generated</b>	<b>Weighted Student Generation Rate</b>
Single-Family	1,500	.449	673	
Affordable	148	.520	77	
<b>Total</b>	<b>1,648</b>		<b>750</b>	<b>0.455</b>

### Projected School Facilities Needs

As demonstrated by Table 1 and Table 2, the Wheatland School District has available capacity to house students generated by projected new residential development. However, as new students are generated by development, the need to increase the useful life of school facilities becomes more apparent. Only with regular modernization can the District maintain facilities to their current quality to ensure they can still be effectively used to house students over the next 20 years. Without the ongoing modernization of its existing facilities to maintain the existing level of service, some WSD school facilities may not be available over the next 20 years to house students in the future. But for the students generated by new residential development, the District would not need to maintain as many facilities at the existing level of service. As shown below, the justified fee is calculated based only on these anticipated modernization costs attributable to new students projected to be generated from new development.

The majority of District facilities were constructed more than 25 years ago and are incompatible with the evolving pace of educational technology, changing school security standards, or otherwise aged and in disrepair. The District needs to perform significant modernization and reconstruction at all school levels to adequately serve students in the future and bring these facilities up to an adopted level of service as identified in Government Code Section 66001(g). Only the proportion of reconstruction costs attributable to seats of existing capacity that will be used to accommodate enrollment from future enrollment are used to calculate the applicable fees.

The Wheatland School District currently has \$3,067,698 in available capital facility funds, all of which is obligated for planned facilities projects for current facilities and students. In addition, the District is undertaking work to replace portable classrooms with permanent facilities as it is feasible. Providing these up-to-date classrooms and learning technology is an essential component of preparing students to succeed in a competitive economy and of being able to maintain the equivalent existing level of service for the next 20 years.

To calculate the modernization needs generated by students from new development, the District must analyze the number of new units to be constructed, the square footage of those units, and, utilizing the weighted student generation rate, the number of students to be generated by those developments. Once this analysis is completed, the per pupil cost to house those students can be calculated based on the cost to modernize facilities. To calculate a weighted average square footage, the average square footage for each type of residential development, as supplied by the City of Wheatland and Yuba County, are multiplied by the number of units expected to be constructed. This provides a total square footage, which

is divided by the total number of units to produce the average square footage for all units. These calculations are shown in Table 3.

**Table 3. Housing Units and Calculation of Weighted Square Footage**

Residential Type	Total Projected Housing Units	Average Square Footage	Total Projected Square Footage	Weighted Average Square Footage
Single-Family	1,500	2,000	3,000,000	
Affordable	148	840	124,256	
<b>Total</b>	<b>1,648</b>		<b>3,124,256</b>	<b>1,896</b>

### New Construction Cost vs. Modernization

The cost per student to construct new school facilities within the Wheatland School District is \$83,586 as shown in Table 4. Construction costs were provided by Van Pelt Construction Services based on records of past and present projects in recent new construction school projects in the Northern California region (Appendix A).

The cost to modernize facilities is 41.1% of new construction costs. This percentage is based on the comparison of the per pupil grant for the State School Facility Program modernization program and the State per pupil new construction grant. In addition, the State program provides additional grants for American with Disabilities Act (ADA) and Fire, Life and Safety (FLS). When analyzing the cost to construct new facilities, the State provides \$14,623 per K-5 pupil and \$5,568 to modernize facilities. For 6-8 pupils, the State provides \$15,466 for new construction and \$5,888 for modernization.

The weighted average of the modernization grants is 38.1% of the new construction grants. However, this 38.1% is a base grant; once ADA and FLS are added into the grant, the percentage becomes 41.1% of the cost of new construction. Appendix B details the School Facility Program per pupil grant amounts.

**Table 4. Cost per Student for New Construction**

Grade Level	New Construction Cost per Student
K-5	\$77,998
6-8	\$94,763
<b>Weighted Average</b> <b><math>((\\$77,998 \times 6) + (\\$94,763 \times 3)) / 9</math></b>	<b>\$83,586</b>

Since the new construction cost per student is \$83,586, the modernization cost per student for the Wheatland School District is 41.1% of this value, or \$34,354.

This modernization cost per student is multiplied by the total students generated from Table 2 to determine the District's total modernization need (Table 5). Dividing the total modernization need by the total projected square footage in Table 3 provides the modernization facilities cost per square foot (Table 6).

**Table 5. District Total Modernization Need**

<b>Modernization Cost per Student</b>	<b>Total Students Generated</b>	<b>Total Modernization Need</b>
\$34,354	750	\$25,765,500

**Table 6. District Modernization Facilities Cost per Square Foot**

<b>Total Modernization Need</b>	<b>Total Projected Square Footage</b>	<b>Facilities Cost per Square Foot</b>
\$25,765,500	3,124,256	<b>\$8.25</b>

The Wheatland School District is justified in collecting residential developer fees at a rate \$8.25 that exceeds 60% of the current statutory Level I fee of \$2.87 (60% of \$4.79). Therefore, the District is justified to collect its 60% share of the full amount of the statutory fee per square foot of new residential construction, currently \$2.87.

## DEVELOPER FEE JUSTIFICATION: COMMERCIAL/INDUSTRIAL PROJECTS

California Assembly Bill 181 provides that a district “must 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 district. For the purposes of making this determination, the study shall utilize employee generation estimates that are based on commercial and industrial factors within the district, as calculated on either an individual project or categorical basis”. However, Assembly Bill 530 modified the requirements of AB 181 by allowing the use of a set of statewide employee generation factors. These factors are identified in the San Diego Association of Governments report, “San Diego Traffic Generators”. This study has become the standard in the industry for the calculation of the commercial/industrial fees.

### Commercial/Industrial Development Fee Calculations

The construction of commercial/industrial buildings within a community generates new employees and, therefore, new residents for a school district. The link between creating new jobs and student enrollment has been acknowledged by the State Allocation Board and in statute. The Legislature has also determined that if there is more impact than can be mitigated by residential fees, and some of this impact is caused by commercial/industrial development, then commercial/industrial development can also be charged fees. As shown above, the District is justified to collect a higher residential fee than the current statutory level.

To determine the impact of commercial/industrial development, several factors must be analyzed to calculate the modernization cost per square foot of this development. Assembly Bill 530 allows for the use of state-wide employee generation factors, specifically those derived from a report entitled San Diego Traffic Generators published by the San Diego Association of Governments in 1990. This report demonstrates the number of employees generated per square foot of commercial/industrial development, by category. Table 7 displays these categories and the number of employees generated for each square foot of space. An average employees/square foot value is then determined for WSD based on these categories.

**Table 7. Commercial/Industrial Employee Generation Factors**

<b>Development Category</b>	<b>Employees/Square Foot</b>
Agriculture	0.00031
Banks	0.00282
Commercial Offices	0.00478
Community Shopping Centers	0.00109
Corporate Offices	0.00268
Industrial Parks	0.00168
Industrial/Business Parks	0.00221
Lodging	0.00155
Medical Offices	0.00427
Neighborhood Shopping Centers	0.00362
Scientific R&D	0.00304
<b>Average</b>	<b>0.00255</b>

Additional data is used to determine the base school facility impact incurred to the District by commercial/industrial development. As shown in Table 8, the calculations also consider the percent of employees in the District who also live in the District, the number of households per employee, the students generated per household, and the modernization cost for each student. Data for percent of employees living in the District and households per employee are sourced from The United States Census Bureau's 2019 American Community Survey. The weighted average of students generated per household was previously shown in Table 2, while the modernization cost per student was shown in Table 4.

**Table 8. Commercial/Industrial Base Cost per Square Foot (Except Mini-Storage)**

<b>Employees/ Square Foot</b>	<b>% Employees Living in District</b>	<b>Households per Employee</b>	<b>K-12 Students per Household</b>	<b>Modernization Cost per Student</b>	<b>Commercial/Industrial Cost per Square Foot</b>
0.00255	9.7	0.686	0.455	\$34,354	<b>\$2.65</b>

It is important to note the mini-storage category of commercial development as an exception to the rates in Table 7. This type of development has a much lower impact than all other categories of commercial/industrial development, with only 0.00006 employees generated per square foot. Table 9 demonstrates the base cost per square foot for mini-storage development only.

**Table 9. Mini-Storage Base Cost per Square Foot**

<b>Employees/ Square Foot</b>	<b>% Employees Living in District</b>	<b>Households per Employee</b>	<b>K-12 Students per Household</b>	<b>Modernization Cost per Student</b>	<b>Commercial/Industrial Cost per Square Foot</b>
0.00006	9.7	.686	0.455	\$34,354	<b>\$0.06</b>

The Wheatland School District is therefore justified in collecting commercial/industrial developer fees at a rate of \$2.65 that exceeds 60% of the current statutory Level I fee of \$0.47 (60% of \$0.78), with the exception of mini-storage development. Therefore, the District is justified to collect its 60% share of the full amount of the statutory fee per square foot of new commercial/industrial construction, which is currently \$0.47, except for mini-storage development, which should be collected at \$0.06 per square foot.

## SUMMARY AND FINDINGS

This study finds that the Wheatland School District is justified in the collection of the statutory developer fees per square foot of both residential and commercial/industrial construction. The District should move forward with adopting the new fees. This requires the District to follow the appropriate notices for a public hearing and meeting all noticing requirements.

This justification is based on the following conclusions of the study:

- While the District currently has capacity to house its students, there remains a need to modernize its school facilities to continue housing new students who are generated from new development at the existing level of service;
  - Modernization costs are 41.1% of new construction costs;
- Residential development will generate 0.455 K-8<sup>th</sup> grade students per unit for the District to house;
  - The District's modernization cost for students generated from residential development is \$8.25 per square foot;
- Commercial/Industrial calculations also indicate a cost to house pupils that would be generated from local housing as a result of residents moving into the District;
  - This modernization cost for students generated from commercial/residential development is \$2.65 per square foot, except for mini-storage development which is \$0.06 per square foot;
- The District meets the criteria to impose the statutory developer fee.

Due to these factors, the District should proceed with adopting its 60% share of the statutory Level I Developer Fees, currently \$2.87 per square foot for residential construction and \$0.47 per square foot for commercial/industrial construction, except for mini-storage which is charged at \$0.06 per square foot.

## ADMINISTRATION OF THE FEES

### Administrative Requirements

The District must maintain a special account for the developer fees collected and any interest which accrues from the fees collected.

### Reporting Requirements

Government Code sections 66006 and 66001 require, annually within 180 days of the end of each fiscal year, that the District make available to the public certain information and adopt prescribed findings relative to Developer Fees adopted pursuant to Education Code section 17620 and Government Code section 65995.

For the fifth fiscal year following the first deposit into the fund, and every five years thereafter, the District is required to make additional findings with respect to that portion of the fund remaining unexpended, whether committed or uncommitted.

This accounting will identify a description of the fee and its amount as well as a beginning and ending fund balance. Also, in the report will be the portion of the collected funds that have been expended, those remaining funds, and the purpose to which those have been and will be put to use. The report must also identify the approximate date upon which a school district anticipates receiving adequate revenue to complete any improvements required as a result of students generated from residential or commercial construction projects.

### Government Code Section 66001 (a) (1): Purpose of Fees

The purpose of the fee is school facility construction and reconstruction to help the District continue to provide school facilities to all pupils, current and new, over the next 20 years by continuing to reconstruct or modernize the existing facilities to maintain the existing level of service for all students.

### Government Code Section 66001 (a) (2): Use of Fees

The District's use of the fee will involve construction and/or reconstruction of school facilities and/or additional permanent facilities on existing school campuses, including but not limited to the types of projects included in this Study and the District's Facility Master Plan. In addition, the District may need to purchase or lease portable classrooms to use for interim housing while permanent facilities are being constructed. Revenue from fees collected on residential and commercial/industrial development may be used to pay for any of the following:

1. Design of School Facilities;
2. Purchase of land for School Facilities;
3. Construction or reconstruction of school facilities including both classroom and instructional spaces, and ancillary supporting facilities.
4. Furniture for use in new school facilities;
5. Testing and inspection of school sites and school buildings and permit and plan check fees;
6. Interim school facilities to house students generated by new development while permanent facilities are being constructed;
7. Legal and administrative costs associated with providing facilities to students generated by new development;



8. Administration of the collection of developer fees;
9. Miscellaneous purposes resulting from student enrollment growth caused by new residential development; and
10. Any other use permitted by law.

#### **Government Code Section 66001 (a) (3): Reasonable Relationship between the Fee's Use and the Type of Development Project on which the Fee is Imposed**

Future residential development will cause new families to move into the District and, consequently, generate additional students in the District. In order to continue providing facilities at the existing level of service for future students, the District will need to modernize and/or reconstruct facilities. The fee's use is therefore reasonably related to the type of project upon which it is imposed.

In addition, new commercial/industrial development will cause new workers to move into the District. Because these workers will have school-age children, the District will need to provide facilities for these students. The fee's use is reasonably related to the type of project upon which it is imposed.

#### **Fees on Residential Reconstruction**

Residential Reconstruction consists of voluntarily demolishing existing residential units and replacing them with new residential development. To the extent reconstruction increases the residential square footage beyond what was demolished, the increase in square footage is subject to the applicable developer fees as such construction is considered new residential development. As for the amount of square footage constructed that replaces only the previously constructed 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 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.

#### **Reconstruction of Commercial/Industrial Square Footage**

The voluntary demolition of existing commercial/industrial buildings and replacement with new residential development is a different category of Reconstruction. The School District will evaluate the impacts of Commercial/Industrial Reconstruction projects on a case-by-case basis and will make a determination of whether a fee credit is justified based on the nature of the project.

#### **Government Code Section 66001 (a) (4): Reasonable Relationship Between the Need for the Public Facility and the Type of Project Upon Which the Fee is Imposed**

As demonstrated in this Study, current District school facilities require renovation/reconstruction to continue providing the existing level of service for the next 20 years. Existing residents and residents from new development, both residential and commercial/industrial, should share in these costs. Therefore, the need for adequate school facilities is directly related to the new residential and commercial/industrial development projects upon which the fee is imposed.

### Government Code Section 66001 (b): Reasonable Relationship Between the Amount of the Fee and the Cost of the Public Facility

The State School Facility Program provides a reference for the relative cost of reconstruction/modernization projects to new construction. This report demonstrates the cost per student for new construction projects, and by using the School Facility Program grant amounts for reference, the cost per student for reconstruction/modernization projects that will need to be undertaken to ensure the District can continue to provide school facilities at the existing level of service for all future students. This report also demonstrates that the cost impact to the District per square foot of development, whether residential or commercial/industrial, is greater than the statutory developer fees to be collected.

## REVENUE SOURCES/FUNDING FACILITIES

The District may also utilize other sources of funding for modernizing and/or reconstructing school facilities. These funding sources include:

### State School Facility Program

Senate Bill 50 reformed the State School Building Lease-Purchase Program in August, 1998. The new program, entitled the School Facility Program, provides funding under a “grant” program once a school district establishes eligibility. Funding required from districts is a 50/50 match for construction projects and a 60/40 match for modernization projects. While there is generally a shortfall between State funding and the District’s actual facility needs, the State monies aid in assisting the District in its facility needs.

### General Obligation Bonds

School districts can, with the approval of 2/3 or 55% of voters, issue General Obligation Bonds which are paid out of property taxes.

The Wheatland School District was successful in passing Measure R in November 2008, which authorized \$5.7 million in bonds in facility improvements. As of 2022 all these funds have been exhausted on completed projects.

### Parcel Taxes

Approval by 2/3 of the voters is required to impose taxes that are not based on the assessed value of individual parcels. The revenues from these taxes are usually minor. Parcel taxes are typically not used for capital outlay. Instead, revenue from such programs is generally used to fund curriculum, instructional enhancements, and other non-facility related expenditures.

### Mello-Roos Community Facilities Districts

This alternative uses a tax on property owners within a defined area to pay long-term bonds issued for specific public improvements. Mello-Roos taxes require approval from 2/3 of the voters in an election.

## RECOMMENDATIONS

This report recommends that the Wheatland School District levy its 60% share of the maximum statutory fee authorized by Government Code Section 65995 on new residential development (currently \$2.87 per square foot) per the District's fee sharing agreement with the high school district. This report also recommends that the Wheatland School District levy its 60% share of the maximum statutory fee authorized by Government Code Section 65995 (currently \$0.47 per square foot) on all categories of commercial/industrial development (except mini-storage) per their fee split agreement with the high school district.

These recommendations are based on the findings that residential and commercial/industrial development create a school facility cost for the Wheatland School District.

## SOURCES

California Basic Educational Data System. California State Department of Education. October Enrollments, 2021-22.

California State Department of Education. California Public School Directory.

California State Department of Finance. Population Research Division.

Perkins, Kevin. Planning Manager. Yuba County.

Valente, Kevin. Senior Planner. City of Wheatland.

Guensler, Craig. Superintendent. Wheatland School District.

Office of Public School Construction. Leroy F. Greene School Facilities Act, 1998.

RealQuest Online Database.

San Diego Association of Governments. Traffic Generators, January 1990.

United States Census Bureau, 2019 American Community Survey.

**APPENDIX A**  
**CONSTRUCTION COSTS**



October 25, 2021

RE: Estimated Site Development Costs  
Subject: Per-Student Costs at Wheatland School District

To Whom it May Concern,

We have reviewed our records of past and present projects that involve recent new school Construction, within the Northern California region. Using a formula based on escalation from projects in previous years, our estimate for the Wheatland School District is as follows:

Elementary School - capacity of 600 students:	\$43,942,752
Construction cost per student	\$77,998
Middle School - capacity of 1000 students:	\$88,979,685
Construction cost per student	\$94,763

These costs assume a reasonably flat site with access to utilities consistent with an urban/residential area. These costs exclude site acquisition. The above estimated costs are for the purposes of discussing State eligibility and developer fees, and are not intended for use in developing budgets for specific projects with unique conditions. Projections beyond the next 12 months will require a minimum of 6.5% escalation compounded annually.

Thank you,

— DocuSigned by:

*Kelli Jurgenson*

Kelli Jurgenson, Vice President  
VPCS

**APPENDIX B**

**PER PUPIL GRANT AMOUNTS**



ATTACHMENT B

**ANNUAL ADJUSTMENT TO SCHOOL FACILITY PROGRAM GRANTS**

State Allocation Board Meeting, February 23, 2022

Grant Amount Adjustments

New Construction	SFP Regulation Section	Adjusted Grant Per Pupil Effective 1-1-21	Adjusted Grant Per Pupil Effective 1-1-22
Elementary	1859.71	\$12,628	\$14,623
Middle	1859.71	\$13,356	\$15,466
High	1859.71	\$16,994	\$19,679
Special Day Class – Severe	1859.71.1	\$35,484	\$41,090
Special Day Class – Non-Severe	1859.71.1	\$23,731	\$27,480
Automatic Fire Detection/Alarm System – Elementary	1859.71.2	\$15	\$17
Automatic Fire Detection/Alarm System – Middle	1859.71.2	\$20	\$23
Automatic Fire Detection/Alarm System – High	1859.71.2	\$34	\$39
Automatic Fire Detection/Alarm System – Special Day Class – Severe	1859.71.2	\$63	\$73
Automatic Fire Detection/Alarm System – Special Day Class – Non-Severe	1859.71.2	\$45	\$52
Automatic Sprinkler System – Elementary	1859.71.2	\$212	\$245
Automatic Sprinkler System – Middle	1859.71.2	\$252	\$292
Automatic Sprinkler System – High	1859.71.2	\$262	\$303
Automatic Sprinkler System – Special Day Class – Severe	1859.71.2	\$668	\$774
Automatic Sprinkler System – Special Day Class – Non-Severe	1859.71.2	\$448	\$519

ATTACHMENT B

**ANNUAL ADJUSTMENT TO SCHOOL FACILITY PROGRAM GRANTS**

State Allocation Board Meeting, February 23, 2022

Grant Amount Adjustments

Modernization	SFP Regulation Section	Adjusted Grant Per Pupil Effective 1-1-21	Adjusted Grant Per Pupil Effective 1-1-22
Elementary	1859.78	\$4,808	\$5,568
Middle	1859.78	\$5,085	\$5,888
High	1859.78	\$6,658	\$7,710
Special Day Class - Severe	1859.78.3	\$15,325	\$17,746
Special Day Class – Non-Severe	1859.78.3	\$10,253	\$11,873
State Special School – Severe	1859.78	\$25,543	\$29,579
Automatic Fire Detection/Alarm System – Elementary	1859.78.4	\$156	\$181
Automatic Fire Detection/Alarm System – Middle	1859.78.4	\$156	\$181
Automatic Fire Detection/Alarm System – High	1859.78.4	\$156	\$181
Automatic Fire Detection/Alarm System – Special Day Class – Severe	1859.78.4	\$430	\$498
Automatic Fire Detection/Alarm System – Special Day Class – Non-Severe	1859.78.4	\$288	\$334
Over 50 Years Old – Elementary	1859.78.6	\$6,680	\$7,735
Over 50 Years Old – Middle	1859.78.6	\$7,065	\$8,181
Over 50 Years Old – High	1859.78.6	\$9,248	\$10,709
Over 50 Years Old – Special Day Class – Severe	1859.78.6	\$21,291	\$24,655
Over 50 Years Old – Special Day Class – Non-Severe	1859.78.6	\$14,237	\$16,486
Over 50 Years Old – State Special Day School – Severe	1859.78.6	\$35,483	\$41,089