Level I Developer Fee Study
for
Cinnabar Elementary School District

February 22, 2023

Ken Silman, Superintendent

Board of Trustees

Paul Sequeria, President

Cathy Thompson, Clerk

Rick O'Hare, Trustee

Jennifer Elu, Trustee

Ken Ishizu, Trustee

Prepared by:

Jack Schreder & Associates, Inc.

2230 K Street
Sacramento, CA 95816
916-441-0986

TABLE OF CONTENTS

EXECUTIVE SUMMARY 1
INTRODUCTION 3
SECTION I: DEVELOPER FEE JUSTIFICATION 6
Facilities Capacity 6
Reconstruction/Modernization 7
Reconstruction/Modernization Need 7
Residential Development and Fee Projections 11
Extent of Mitigation of School Facility Costs Provided by Level I Residential Fees 13
Commercial / Industrial Development and Fee Projections 13
Extent of Mitigation of School Facility Costs Provided by Level I Commercial/Industrial Fees 15
Summary 16
SECTION II: BACKGROUND OF DEVELOPER FEE LEGISLATION 16
SECTION III: REQUIREMENTS OF AB 1600 19
SECTION IV: REVENUE SOURCES FOR FUNDING FACILITIES 22
State Sources 22
Local Sources 22
SECTION V: ESTABLISHING THE COST, BENEFIT AND BURDEN NEXUS 24
SECTION VI: FACILITY FUNDING ALTERNATIVES 25
STATEMENT TO IDENTIFY PURPOSE OF FEE 26
ESTABLISHMENT OF A SPECIAL ACCOUNT 26
RECOMMENDATION 26
SOURCES 27

APPENDIX A: PER PUPIL CONSTRUCTION COSTS ..... APP 1
APPENDIX B: PER PUPIL GRANT AMOUNTS ..... APP 2
APPENDIX C: COMMERCIAL/INDUSTRIAL CALCULATIONS ..... APP 3
APPENDIX D: PROJECTED DEVELOPMENT SUMMARY ..... APP 4

LIST OF TABLES

Page

Table 1: Construction Costs 9
Table 2: Projected Students from Proposed Development 10
Table 3: 25 year Reconstruction/modernization Need 11
Table 4: Summary of Projected Residential Square Footage 12
Table 5: Facilities Cost per SF from Proposed Residential Construction 12
Table 6: Commercial and Industrial Generation Factors 14
Table 7: Commercial and Industrial Facilities Cost Impact 15

EXECUTIVE SUMMARY

- Education Code Section 17620 authorizes school districts to levy a fee, charge, dedication or other form of requirement against any development project for the construction or reconstruction/modernization of school facilities, provided the District can show justification for levying of fees.

- 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 Cinnabar Elementary School District shares developer fees with the Petaluma Joint Union High School District. The High School District collects 46 percent of the Level I Fee and the Cinnabar Elementary School District collects 54 percent of the Level I Fee.

- The Cinnabar Elementary School District is justified in collecting $2.59 (54 percent of $4.79) per square foot of residential construction and $0.42 (54 percent of $0.78) per square foot of commercial/industrial construction, with the exception of mini storage and agriculture. The mini storage category of construction should be collected at a rate of $0.02 per square foot and agriculture at $0.31 per square foot.

- In general, 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 percent of the cost to construct new facilities.

- The residential justification is based on the Cinnabar Elementary School District's projected reconstruction/modernization need of $1,937,060 for students generated from residential development over the next 25 years and the projected residential square footage of 257,030.

- Based on the reconstruction/modernization need for students generated from projected residential development and the projected residential square footage,

each square foot of residential construction will create a school facilities cost of $7.54 ($1,937,060/257,030).

- Each square foot of commercial/industrial construction will create a school facilities cost ranging from $0.02 to $2.20 per square foot of new commercial/industrial construction.

- For both residential and commercial/industrial development, the fees authorized by Government Code section 65995 are justified.

INTRODUCTION

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 which states in part "...the governing board of any school district is authorized to levy a fee, charge, dedication or other form of requirement against any development project for the construction or reconstruction/modernization of school facilities."

The Level I fee that can be levied is adjusted every two years according to the inflation rate, as listed by the state-wide index for Class B construction set by the State Allocation Board. In January of 1992, the State Allocation Board increased the Level I fee to $1.65 per square foot for residential construction and $0.27 per square foot for commercial and industrial construction.

Senate Bill 1287 (Chapter 1354/Statutes of 1992) effective January 1, 1993, affected the facility mitigation requirements a school district could impose on developers. Senate Bill 1287 allowed school districts to levy an additional $1.00 per square foot of residential construction (Government Code Section 65995.3). The authority to levy the additional $1.00 was rescinded by the failure of Proposition 170 on the November 1993 ballot.

In January 1994, the State Allocation Board's biennial inflation adjustment changed the fee to $1.72 per square foot for residential construction and $0.28 per square foot for commercial/industrial construction.

In January 1996, the State Allocation Board's biennial inflation adjustment changed the fee to $1.84 per square foot for residential construction and $0.30 per square foot for commercial/industrial construction.

In January 1998, the State Allocation Board's biennial inflation adjustment changed the fee to $1.93 per square foot for residential construction and $0.31 per square foot for commercial/industrial construction.

In January 2000, the State Allocation Board's biennial inflation adjustment changed the fee to $2.05 per square foot for residential construction and $0.33 per square foot for commercial/industrial construction.

In January 2002, the State Allocation Board's biennial inflation adjustment changed the fee to $2.14 per square foot for residential construction and $0.36 per square foot for commercial/industrial construction.

In January 2004, the State Allocation Board's biennial inflation adjustment changed the fee to $2.24 per square foot for residential construction and $0.41 per square foot for commercial/industrial construction.

In January 2006, the State Allocation Board's biennial inflation adjustment changed the fee to $2.63 per square foot for residential construction and $0.42 per square foot for commercial/industrial construction.

In January 2008, the State Allocation Board's biennial inflation adjustment changed the fee to $2.97 per square foot for residential construction and $0.47 per square foot for commercial/industrial construction.

In January 2010, the State Allocation Board's biennial inflation adjustment maintained the fee at $2.97 per square foot for residential construction and $0.47 per square foot for commercial/industrial construction.

In January 2012, the State Allocation Board's biennial inflation adjustment changed the fee to $3.20 per square foot for residential construction and $0.51 per square foot for commercial/industrial construction.

In January 2014, the State Allocation Board's biennial inflation adjustment changed the fee to $3.36 per square foot for residential construction and $0.54 per square foot for commercial/industrial construction.

In February 2016, the State Allocation Board's biennial inflation adjustment changed the fee to $3.48 per square foot for residential construction and $0.56 per square foot for commercial/industrial construction.

In January 2018, the State Allocation Board's biennial inflation adjustment changed the fee to $3.79 per square foot for residential construction and $0.61 per square foot for commercial/industrial construction.

In January 2020, the State Allocation Board's biennial inflation adjustment changed the fee to $4.08 per square foot for residential construction and $0.66 per square foot for commercial/industrial construction.

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 next adjustment to the fee will occur at the January 2024 State Allocation Board meeting.

In order to levy a fee, a district must make a finding that the fee to be paid bears a reasonable relationship and be limited to the needs of the community for elementary or high school facilities and be reasonably related to the need for schools caused by the development. Fees are different from taxes and do not require a vote of the electorate. Fees may be used only for specific purposes and there must be a reasonable relationship between the levying of fees and the impact created by development.

In accordance with the recent decision in the *Cresta Bella* LP v. *Poway Unified School District*, 218 Cal. App.4th 438(2013) court case, school districts are now required to demonstrate that reconstruction projects will generate an increase in the student population thereby creating an impact on the school district's facilities. School districts must establish a reasonable relationship between an increase in student facilities needs and the reconstruction project in order to levy developer fees.

Purpose of Study

This study will demonstrate the relationship between residential, commercial and industrial growth and the need for the reconstruction/modernization of school facilities in the Cinnabar Elementary School District.

SECTION I: DEVELOPER FEE JUSTIFICATION

Developer fee law requires that before fees can be levied a district must find that justification exists for the fee. Government Code Section 66001 (g) states that a fee shall not include the costs attributable to existing deficiencies in public facilities, but may include the costs attributable to the increased demand for public facilities reasonably related to the development project in order to refurbish existing facilities to maintain the existing level of service or achieve an adopted level of service that is consistent with a general plan. This section of the study will show that justification does exist for levying developer fees in the Cinnabar Elementary School District.

Facilities Capacity

The District's capacity is adequate to house the District's current student population. Facility needs exist regardless of the availability of capacity to house student enrollments, inclusive of student enrollment generated from new development. New students generated from future development will create a burden on existing school facilities. Capital improvements, including upgrades or the replacement of existing facilities with new facilities for their continued long-term use, are necessary to adequately house future enrollment growth at all school levels.

The District's current total student capacity will diminish over time if the District does not modernize its facilities. Without reconstruction/modernization of aging buildings, some facilities will become unavailable, which will decrease the District's total student capacity. New development in the District necessitates that reconstruction/modernization occur in order to continue to have available school housing for newly generated students. As part of these reconstruction/modernization efforts, the District plans to modernize existing schools and to replace some of its existing schools with new buildings on the same site as the existing schools become old, inadequate, and pose health and safety challenges.

Reconstruction/Modernization

Extending the useful life of a school is a cost effective and prudent way to house students generated from future development. The state of California recognizes the need to extend the life of existing schools and provides reconstruction/modernization funding through the State School Facility Program. For the purpose of this report, reconstruction/modernization and reconstruction are used interchangeably since many of the improvements are common to both programs. Developer fees may not be used for regular maintenance, routine repair of school buildings and facilities or deferred maintenance. The District plans to use developer fees for projects including, but not limited to, constructing an outdoor stage and music area and expanding the multi-use room and outdoor lunch area. Projects will be funded as developer fee revenue is generated. The authorization to justify reconstruction/modernization of school facilities and extend the useful life of existing schools is contained in Education Code Section 17620 and Government Code Section 66001 (g). School districts are permitted to modernize or replace existing facilities or build new school facilities with developer fees as justified by this Study.

Reconstruction/Modernization Need

As new students are generated by new development, the need to increase the useful life of school facilities will be necessary. In order to calculate the District's estimated reconstruction/modernization need generated by students from new development, it is necessary to determine the following factors: the number of units included in proposed developments, the District student yield factor, and the per pupil cost to modernize facilities.

Projected Development

The Cinnabar Elementary School District is located within the Sonoma County and City of Petaluma planning jurisdictions. According to the Sonoma County's Travel Model – Updating General Plan Buildout Estimates, an estimated 184 residential units may be constructed in the next 25 years. Of the potential units, 155 are projected to be single family and 29 are projected to be multi family. Appendix D includes a development summary along with the Report methodology used to project

development. The Report included in Appendix D is dated October 24, 2018; the Study is in the process of being updated. The report was included to explain the methodology used to project development along with the current projections provided by the Sonoma County Transportation Authority.

The School Facility Program allows districts to apply for reconstruction/ modernization funding for classrooms over 25 (permanent) or 20 (portable) years, meaning that school facilities are presumed to be eligible for, and therefore need, reconstruction/modernization after that time period. It is therefore generally presumed that school facilities have a useful life span of 25 years before reconstruction/ modernization is needed in order to maintain the same level of service as previously existed. The same would be true for reconstruction/modernization of buildings 25 years after their initial reconstruction/modernization. In some cases, these older buildings may need to be closed entirely for the health and safety of students, teachers, staff and other occupants. Aging infrastructure and building problems can profoundly impact a school's ability to safely remain in service and to continue delivering the instructional program to students at existing levels of service. Therefore, the District's reconstruction/modernization needs are considered over a 25 year period, and a 25 year projection has been included in the Study when considering the homes that will generate students for the facilities in question. Future development will generate additional students for the District to house. Developer fees generated from future development may be used to modernize or construct facilities to house students from planned future development.

School facilities have a limited usable lifespan, and school districts must consider the lifespan for each facility when planning and determining student housing needs in the future. Residential units will be built at different times over the coming years, and it is difficult to predict when construction on these projects will be complete. Additionally, the homes in these developments may be immediately occupied with families with school-aged children, or they may not be occupied by school-aged children for another five, ten or fifteen years as young people who move in begin to have families. Thus, the District must be prepared to house students from new developments for the next several decades.

Student Generation Rate

In determining the impact of new development, the District is required to show how many students will be generated from the new development. In order to ensure that new development is paying only for the impact of those students that are being generated by new homes and businesses, the student generation rate is applied to the number of new housing units to determine development-related impacts. The student generation rate identifies the number of students per housing unit and provides a link between new residential construction projects and projected enrollment.

To identify the number of students anticipated to be generated by new residential development, a student yield factor of .5 has been utilized for the Cinnabar Elementary School District. The yield factor is based on State wide student yield averages calculated by the Office of Public School Construction.

Construction Cost

The construction cost per TK-8 pupil is $51,228. Construction costs are based on information provided by California Department of Education and research completed by Jack Schreder & Associates. Appendix A includes the cost per student calculations. Table 1 shows the weighted average to construct facilities per TK-8 pupil.

Table 1:
Construction Costs

Grade Level	Construction Costs
TK-6	$49,425
7-8	$58,440
Weighted Average ($49,425 x 8) +($58,440 x 2)/10	$51,228

Source: California Department of Education, Jack Schreder & Associates.

Reconstruction/Modernization Cost

The cost to modernize facilities is 41.1 percent of new construction costs. The percentage is based on the comparison of the State per pupil reconstruction/ modernization grant (including 3% for Americans with Disabilities and Fire, Life Safety improvements) and the State per pupil new construction grant. For example, the State provides $14,623 per TK-8 pupil to construct new facilities and $5,568 to modernize facilities, which is 38.1 percent ($5,568 / $14,623) of the new construction grant amount. In addition, the State provides a minimum of three percent for ADA/FLS improvements which are required by the Department of State Architect's (DSA) office. Based on the per pupil grant amounts and the ADA/FLS costs, the estimated cost to modernize facilities is 41.1 percent of the cost to construct facilities. The School Facility Program per pupil grant amounts are included in Appendix B.

The construction cost per TK-8 pupil is $51,228 and is outlined in Table 1. Therefore, the per pupil cost to modernize facilities per TK-8 pupil is $21,055 ($51,228 x .411).

25 year Reconstruction/modernization Need

Based on the student generation rate and the projected number of residential units, 92 TK-8 students are projected from proposed new development. The calculation is included in Table 2.

Table 2:
Projected Students from Proposed Development

Projected Units	Student Generation Rate	Projected Students
184	.5	92

Source: Cinnabar Elementary School District, Sonoma County Transportation Authority, Office of Public School Construction.

The District's estimated reconstruction/modernization need generated by students from new residential development is $1,937,060. The calculation is included in Table 3.

Table 3:
25 year Reconstruction/modernization Need

Per Pupil Reconstruction/modernization Cost	$21,055
Students Generated	x 92
Reconstruction/modernization Need	**$1,937,060**

Source: Cinnabar Elementary School District, Office of Public School Construction, Jack Schreder & Associates, Sonoma County Transportation Authority.

Residential Development and Fee Projections

To show a reasonable relationship exists between the construction of new housing units and the need for modernized school facilities, it will be shown that residential construction will create a school facility cost impact on the Cinnabar Elementary School District by students generated from new development.

The Cinnabar Elementary School District is located within the Sonoma County and City of Petaluma planning jurisdictions. According to the Sonoma County's Travel Model – Updating General Plan Buildout Estimates, an estimated 184 residential units may be constructed in the next 25 years. Based on the recent construction, single family units may average an estimated 1,488 square feet. Due to minimal multi family construction within the District's boundary, the average multi family square footage is based on a district in the same County. An average of 910 square feet was included for multi family units. It is projected that 155 single family and 29 multi residential units totaling 257,030 square feet may be constructed in the next 25 years. Appendix D includes a development along with the Report methodology used to project development. The Report included in Appendix D is dated October 24, 2018; the Study is in the process of being updated. The report was included to explain the methodology used to project development along with the current projections provided by the Sonoma County Transportation Authority. Table 4 summarizes the projected square footage by unit type.

Table 4:

Summary of Projected Residential Square Footage

Unit Type	Projected Units	Average Square Footage	Total Square Footage
Single Family	155	1,488	230,640
Multi Family	29	910	26,390
Total	184		257,030

Source: Cinnabar Elementary School District, Jack Schreder & Associates, Sonoma County Transportation Authority.

Based on the District's reconstruction/modernization need of $1,937,060 generated by students from residential construction and the total projected residential square footage of 257,030, residential construction will create a facilities cost of $7.54 per square foot. The calculation is included in Table 5. However, the Level I statutory fee is $4.79 per square foot and the District has a fee sharing arrangement with the Petaluma Joint Union High School District. The High School district collects 46 percent of the fee and the Cinnabar Elementary School District collects 54 percent of the fee. Therefore, the District is justified to collect $2.59 (54 percent of $4.79) per square foot of residential construction.

Table 5:

Facilities Cost per SF from Proposed Residential Construction

Reconstruction/Mod. Need	Total Square Footage		Facilities Cost
$1,937,060	/257,030	=	$7.54

Source: Cinnabar Elementary School District, Jack Schreder & Associates, Office of Public School Construction, Sonoma County Transportation Authority.

Extent of Mitigation of School Facility Costs Provided by Level I Residential Fees

Based on development projections, an estimated 257,030 residential square feet may be constructed in the next 25 years. Based on the statutory Level I fee of $2.59 (54 percent of $4.79) per square foot, the District is projected to collect $665,708 ($2.59 x 257,030) in residential developer fees. The $665,708 in total residential Level I fee revenue will cover only 34 percent of the $1,937,060 in total school facility reconstruction/modernization costs attributable to new residential development over the next 25 years.

Commercial / Industrial Development and Fee Projections

In order to levy developer fees on commercial and industrial development, a district must conduct a study to determine the impact of the increased number of employees anticipated to result from commercial and industrial development upon the cost of providing school facilities within the district. For the purposes of making this determination, the developer fee justification study shall utilize employee generation estimates that are calculated on either an individual project or categorical basis. Those employee generation estimates shall be based upon commercial and industrial factors within the district or upon, in whole or part, the applicable employee generation estimates as set forth in the January 1990 edition of "San Diego Traffic Generators," a report of the San Diego Association of Governments (Education Code Section 17621). The initial study that was completed in January of 1990 (updated annually) identifies the number of employees generated for every 1,000 square feet of floor area for several development categories. These generation factors are shown in Table 6.

Table 6 indicates the number of employees generated for every 1,000 square feet of new commercial and industrial development and the number of District households generated for every employee in 12 categories of commercial and industrial development. The number of District households is calculated by adjusting the number of employees for the percentage of employees that live in the District and are heads of households. School facility costs for development projects not included on the list may be estimated by using the closest employee per 1,000 square feet ratio available for the proposed development.

In addition, an adjustment in the formula is necessary so that students moving into new residential units that have paid residential fees are not counted in the commercial/industrial fee calculation. Based on 2020 US Census data, 20.2 percent of all employees in the District live in existing housing units. The 20.2 percent adjustment eliminates double counting the impact. This adjustment is shown in the worksheets in Appendix C and in Table 6.

When these figures are compared to the cost to house students, it can be shown that each square foot of commercial and industrial development creates a cost impact greater than the maximum fee, with the exception of mini storage and mini storage. The data in Table 7 is based on the per student costs shown in Table 1. These figures are multiplied by the student yield factor to determine the number of students generated per square foot of commercial and industrial development. To determine the school facilities square foot impact of commercial and industrial development shown in Table 7, the students per square foot are multiplied by the cost of providing school facilities.

Table 6:

Commercial and Industrial Generation Factors

Type of Development	*Employees per 1,000 sf	**Dist HH Per Emp.	***% Emp in Exist HH	Adj.%Emp Dist HH/Emp
Medical Offices	4.27	.2	.202	.0404
Corporate Offices	2.68	.2	.202	.0404
Commercial Offices	4.78	.2	.202	.0404
Lodging	1.55	.3	.202	.0606
Scientific R&D	3.04	.2	.202	.0404
Industrial Parks	1.68	.2	.202	.0404
Industrial/Business Parks	2.21	.2	.202	.0404
Neighborhood Shopping Centers	3.62	.3	.202	.0606
Community Shopping Centers	1.09	.3	.202	.0606
Banks	2.82	.3	.202	.0606
Mini-Storage	.06	.2	.202	.0404
Agriculture	.31	.5	.202	0.10

* *Source: San Diego Association of Governments.*

** *Source: Jack Schreder and Associates. Original Research.*

*** *Source: 2020 US Census*

Table 7:

Commercial and Industrial Facilities Cost Impact

Type of Development	Cost Impact Per Sq. Ft.
Medical Offices	$1.73
Corporate Offices	$1.09
Commercial Offices	$1.94
Lodging	$0.94
Scientific R&D	$1.23
Industrial/Business Parks	$0.68
Industrial/Com Park	$0.90
Commercial Shopping Centers	$2.20
Community Shopping Centers	$0.66
Banks	$1.71
Mini-Storage	$0.02
Agriculture	$0.31

**Sources: San Diego Association of Governments and Jack Schreder and Associates, Original Research.*

Table 7 shows that all types of commercial and industrial development will create a square foot cost justifying a commercial/industrial fee. Thus, a reasonable relationship between commercial and industrial development and the impact on the District is shown. Based on this relationship, the levying of commercial and industrial developer fees is justified in the District.

Extent of Mitigation of School Facility Costs Provided by Level I Commercial/Industrial Fees

Each square foot of commercial and industrial development creates a school facility cost ranging from $0.02 to $2.20 per square foot. The cost per square foot of commercial/industrial construction exceeds the District's share of the Level I commercial fee of $0.42 (54 percent of $0.78) in all categories of construction, with the exception of agriculture and mini storage. Mini storage should be collected at $0.02 per square foot of construction and agriculture at $0.31 per square foot. Therefore, the District is justified to collect $0.42 (54 percent of $0.78) per square foot of

commercial/industrial construction for all other categories of commercial/industrial construction.

Summary

The cost impact on the District imposed by new students to be generated from new or expanded residential, commercial, and industrial development is greater than the maximum allowable fees. Each square foot of residential development creates a school facility cost of $7.54 per square foot. Each square foot of commercial and industrial development creates a school facility cost ranging from $0.02 to $2.20 per square foot. The cost to provide additional school facilities exceeds the amount of residential and commercial/industrial fees to be generated directly and indirectly by residential construction. However, the District currently has a Level I Fee Sharing Agreement with the Petaluma Joint Union High School District. The High School District collects 46 percent of the Level I fee and the Elementary School District collect 54 percent of the fee. Therefore, the Cinnabar Elementary School District is justified to collect $2.59 (54 percent of $4.79) per square foot of residential construction and $0.42 (54 percent of $0.78) per square foot of commercial/industrial construction, with the exception of mini storage and agriculture. The mini storage category of construction should be collected at the rate of $0.02 per square foot and agriculture at $0.31 per square foot.

SECTION II: BACKGROUND OF DEVELOPER FEE LEGISLATION

Initially, the allowable developer fee was limited by Government Code Section 65995 to $1.50 per square foot of covered or enclosed space for residential development and $0.25 per square foot of covered or enclosed space of commercial or industrial development. The Level I fee that can be levied is adjusted every two years, according to the inflation rate as listed by the state-wide index for Class B construction set by the State Allocation Board. In February of 2022, the State Allocation Board changed the Level I fee to $4.79 per square foot of residential construction and $0.78 per square foot of commercial and industrial construction.

The fees collected are to be used by the school district for the construction or reconstruction/modernization of school facilities and may be used by the district to pay

bonds, notes, loans, leases or other installment agreements for temporary as well as permanent facilities.

Assembly Bill 3980 (Chapter 418/Statutes of 1988) added Government Code Section 66006 to require segregation of school facilities fees into a separate capital facilities account or fund and specifies that those fees and the interest earned on those fees can only be expended for the purposes for which they were collected.

Senate Bill 519 (Chapter 1346/Statutes of 1987) added Section 17625 to the Education Code. It provides that a school district can charge a fee on manufactured or mobile homes only in compliance with all of the following:

1. The fee, charge, dedication, or other form of requirement is applied to the initial location, installation, or occupancy of the manufactured home or mobile home within the school district.

2. The manufactured home or mobile home is to be located, installed, or occupied on a space or site on which no other manufactured home or mobile home was previously located, installed, or occupied.

3. The manufactured home or mobile home is to be located, installed, or occupied on a space in a mobile home park, on which the construction of the pad or foundation system commenced after September 1, 1986.

Senate Bill 1151 (Chapter 1037/Statutes of 1987) concerns agricultural buildings and adds Section 17622 to the Education Code. It provides that no school fee may be imposed and collected on a greenhouse or other space covered or enclosed for agricultural purposes unless the school district has made findings supported by substantial evidence as follows:

1. The amount of the fees bears a reasonable relationship and is limited to the needs for school facilities created by the greenhouse or other space covered or enclosed for agricultural purposes.

2. The amount of the fee does not exceed the estimated reasonable costs of the school facilities necessitated by the structures as to which the fees are to be collected.

3. In determining the amount of the fees, the school district shall consider the relationship between the proposed increase in the number of employees, if any, the size and specific use of the structure, as well as the cost of construction.

In order to levy developer fees, a study is required to assess the impact of new growth and the ability of the local school district to accommodate that growth. The need for new school construction and reconstruction/modernization must be determined along with the costs involved. The sources of revenue need to be evaluated to determine if the district can fund the new construction and reconstruction/modernization. Finally, a relationship between needs and funding raised by the fee must be quantified.

Assembly Bill 181 (Chapter 1109/Statutes of 1989) which became effective October 2, 1989, was enacted to clarify several areas of developer fee law. Assembly Bill 181 provisions include the following:

1. Exempts residential remodels of less than 500 square feet from fees.

2. Prohibits the use of developer fee revenue for routine maintenance and repair, most asbestos work, and deferred maintenance.

3. Allows the fees to be used to pay for the cost of performing developer fee justification studies.

4. States that fees are to be collected at the time of occupancy, unless the district can justify earlier collection. The fees can be collected at the time the building permit is issued if the district has established a developer fee account and funds have been appropriated for which the district has adopted a proposed construction schedule or plan prior to the issuance of the certificate of occupancy.

5. Clarifies that the establishment or increase of fees is not subject to the California Environmental Quality Act.

6. Clarifies that the impact of commercial and industrial development may be analyzed by categories of development as well as an individual project-by-project basis. An appeal process for individual projects would be required if analysis was done by categories.

7. Changes the frequency of the annual inflation adjustment on the Level I fee to every two years.

8. Exempts from fees - development used exclusively for religious purposes, private schools, and government-owned development.

9. Expands the definition of senior housing, which is limited to the commercial/industrial fee and requires the conversion from senior housing to be approved by the city/county after notification of the school district.

10. Extends the commercial/industrial fee to mobile home parks limited to older persons.

SECTION III: REQUIREMENTS OF AB 1600

Assembly Bill 1600 (Chapter 927/Statutes of 1987) adds Section 66000 through 66003 to the Government Code:

Section 66000 defines various terms used in AB 1600:

"Fee" is defined as monetary exaction (except a tax or a special assessment) which is charged by a local agency to the applicant in connection with the approval of a development project for the purpose of defraying all or a portion of the costs of public facilities related to the development project.

"Development project" is defined broadly to mean any project undertaken for purposes of development. This would include residential, commercial, or industrial projects.

"Public facilities" is defined to include public improvements, public services, and community amenities.

Section 66001 (a) sets forth the requirements for establishing, increasing or imposing fees. Local agencies are required to do the following:

1. Identify the purpose of the fee.

2. Identify the use to which the fee is to be put.

3. Determine how there is a reasonable relationship between the fee's use and the type of development project on which the fee is imposed.

4. Determine how there is a reasonable relationship between the need for the public facility and the type of development project on which the fee is imposed.

Section 66001 (c) requires that any fee subject to AB 1600 be deposited in an account established pursuant to Government Code Section 66006. Section 66006 requires that development fees be deposited in a capital facilities account or fund. To avoid any commingling of the fees with other revenues and funds of the local agency, the fees can only be expended for the purpose for which they were collected. Any income earned on the fees should be deposited in the account and expended only for the purposes for which the fee was collected.

Section 66001 (d) as amended by Senate Bill 1693 (Monteith/Statutes of 1996, Chapter 569), requires that for the fifth year following the first deposit into a developer fee fund, and for every five years thereafter, a school district must make certain findings as to such funds. These findings are required regardless of whether the funds are committed or uncommitted. Formerly only remaining unexpended or uncommitted fees were subject to the mandatory findings and potential refund process. Under this

section as amended, relating to unexpended fee revenue, two specific findings must be made as a part of the public information required to be formulated and made available to the public. These findings are:

1. Identification of all sources and amounts of funding anticipated to provide adequate revenue to complete any incomplete improvements identified pursuant to the requirements of Section 66001 (a)(2).

2. A designation of the approximate date upon which the anticipated funding will be received by the school district to complete the identified but as yet, incomplete improvements.

If the two findings are not made, a school district must refund the developer fee revenue on account in the manner provided in Section 66001 (e).

Section 66001 (e) provides that the local agency shall refund to the current record owners of the development project or projects on a prorated basis the unexpended or uncommitted portion of the fees and any accrued interest for which the local agency is unable to make the findings required by Section 66001 (d) that it still needs the fees.

Section 66002 provides that any local agency which levies a development fee subject to Section 66001 may adopt a capital improvement plan which shall be updated annually and which shall indicate the approximate location, size, time of availability and estimates of cost for all facilities or improvements to be financed by the fees.

Assembly Bill 1600 and the Justification for Levying Developer Fees

Effective January 1, 1989, Assembly Bill 1600 requires that any school district which establishes, increases or imposes a fee as a condition of approval of development shall make specific findings as follows:

1. A cost nexus must be established. A cost nexus means that the amount of the fee cannot exceed the cost of providing adequate school facilities for students generated by development. Essentially, it prohibits a school

district from charging a fee greater than their cost to construct or modernize facilities for use by students generated by development.

2. A benefit nexus must be established. A benefit nexus is established if the fee is used to construct or modernize school facilities benefiting students to be generated from development projects.

3. A burden nexus must be established. A burden nexus is established if a project, by the generation of students, creates a need for additional facilities or a need to modernize existing facilities.

SECTION IV: REVENUE SOURCES FOR FUNDING FACILITIES

Two general sources exist for funding facility construction and reconstruction/modernization - state sources and local sources. The District has considered the following available sources:

State Sources

State School Facility Program

Senate Bill 50 reformed the State School Building Lease-Purchase Program in August of 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 will be a 50/50 match for construction projects and 60/40 (District/State) match for reconstruction/modernization projects. Districts may levy the current statutory developer fee as long as a district can justify collecting that fee. If a district desires to collect more than the statutory fee (Level 2 or Level 3), that district must meet certain requirements outlined in the law, as well as conduct a needs assessment to enable a higher fee to be calculated.

Local Sources

Mello-Roos Community Facilities Act

The Mello-Roos Community Facilities Act of 1982 allows school districts to establish a community facilities district in order to impose a special tax to raise funds to finance the construction of school facilities.

1. The voter approved tax levy requires a two-thirds vote by the voters of the proposed Mello-Roos district.

2. If a Mello-Roos district is established in an area in which fewer than twelve registered voters reside, the property owners may elect to establish a Mello-Roos district.

General Obligation Bonds

General Obligation (GO) bonds may be issued by any school district for the purposes of purchasing real property or constructing or purchasing buildings or equipment "of a permanent nature." Because GO bonds are secured by an ad valorem tax levied on all taxable property in the district, their issuance is subject to two-thirds voter approval or 55% majority vote under Proposition 39 in an election. School districts are obligated, in the event of delinquent payments on the part of the property owners, to raise the amount of tax levied against the non-delinquent properties to a level sufficient to pay the principal and interest coming due on the bonds.

The District passed a bond November 2014 in the amount of $2.5 million for which the funds have been expended.

Developer Fees

The District's developer fees are dedicated to the current needs related directly to reconstruction/modernization and replacement of school facilities.

School District General Funds

The District's general funds are needed by the District to provide for the operation of its instructional program.

Expenditure of Lottery Funds

Government Code Section 8880.5 states: "It is the intent of this chapter that all funds allocated from the California State Lottery Education Fund shall be used exclusively for the education of pupils and students and no funds shall be spent for acquisition of real property, construction of facilities, financing research, or any other non-instructional purpose."

SECTION V: ESTABLISHING THE COST, BENEFIT AND BURDEN NEXUS

In accordance with Government Code Section 66001, the District has established a cost nexus and identified the purpose of the fee, established a benefit nexus, and a burden nexus:

Establishment of a Cost Nexus & Identify Purpose of the Fee

The Cinnabar Elementary School District chooses to replace and/or modernize facilities for the additional students created by development in the district and the cost to replace and/or modernize facilities exceeds the amount of developer fees to be collected.

Based on development projections, an estimated 257,030 residential square feet may be constructed in the next 25 years. Based on the statutory Level I fee of $2.59 (54 percent of $4.79) per square foot, the District is projected to collect $665,708 ($2.59 x 257,030) in residential developer fees. The $665,708 in total residential Level I fee revenue will cover only 34 percent of the $1,937,060 in total school facility reconstruction/modernization costs attributable to new residential development over the next 25 years. Each square foot of commercial and industrial development creates a school facility cost ranging from $0.02 to $2.20 per square foot. The cost per square foot of commercial/industrial construction exceeds the District's share of the Level I commercial fee of $0.42 (54 percent of $0.78) in all categories of construction, with the exception of mini storage and agriculture. Mini storage should be collected at $0.02 per square foot of construction and agriculture at $0.31 per square foot. It is clear that when educational facilities are provided for students generated by new residential,

commercial and industrial development that the cost of replacing and/or modernizing facilities exceeds developer fee generation, thereby establishing a cost nexus.

Establishment of a Benefit Nexus

Students generated by new residential, commercial and industrial development will be attending District schools. Housing District students in replaced and/or modernized facilities will directly benefit those students from the new development projects upon which the fee is imposed, therefore, a benefit nexus is established.

Establishment of a Burden Nexus

Future residential and commercial/industrial development will cause new families to move into the District and, consequently, will generate additional students in the District. While facilities are currently designed to meet the projected student enrollment, the existing facilities will need to remain in sufficient condition to maintain existing levels of service for the newly generated students. Future residential and commercial/industrial development, therefore, creates a need for the reconstruction and/or reconstruction/modernization of existing school facilities. The fee's use for school facility reconstruction and/or reconstruction/modernization efforts is, therefore, reasonably related to the future residential and commercial/industrial development upon which it is imposed.

The need for reconstructing and/or modernizing facilities will be, in part, satisfied by the levying of developer fees on new residential and commercial/industrial developments, therefore, a burden nexus is established.

SECTION VI: FACILITY FUNDING ALTERNATIVES

The District does not currently have funds to provide for the shortfall in reconstruction/modernization costs. We suggest the District continue to consider all available State facility funding sources.

STATEMENT TO IDENTIFY PURPOSE OF FEE

It is a requirement of AB 1600 that the District identify the purpose of the fee. The purpose of fees being levied shall be used for the replacement and/or reconstruction/ modernization of school facilities. The District will provide for the replacement and/or reconstruction/modernization of school facilities, in part, with developer fees. The District plans to use developer fees for projects including, but not limited to, constructing an outdoor stage and music area and expanding the multi-use room and outdoor lunch area. Projects will be funded as developer fee revenue is generated.

ESTABLISHMENT OF A SPECIAL ACCOUNT

Pursuant to Government Code section 66006, the District has established a special account in which fees for capital facilities are deposited. The fees collected in this account will be expended only for the purpose for which they were collected. Any interest income earned on the fees that are deposited in such an account must remain with the principal. The school district must make specific information available to the public within 180 days of the end of each fiscal year pertaining to each developer fee fund. The information required to be made available to the public by Section 66006 (b) (1) was amended by SB 1693 and includes specific information on fees expended and refunds made during the year.

RECOMMENDATION

Based on the fee justification provided in this report, it is recommended that the Cinnabar Elementary School District levy residential development fees and commercial/industrial fees up to the statutory fee for which justification has been determined.

SOURCES

Barney, Christopher. Senior Transportation Planner, Sonoma County.

California Basic Educational Data System. California State Department of Education. October Enrollments, 2019-2022.

California Department of Education, Dataquest.

Collard, Gary. Lead Housing Analyst for Southern California. California State Department of Housing and Community Development.

Local Control Accountability Plan. Cinnabar Elementary School District. 2021-2022.

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

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

Schreder, Jack and Associates. Original research.

Silman, Ken. Superintendent, Cinnabar Elementary School District.

United States Census, 2020.

APPENDIX A

CONSTRUCTION COSTS

Elementary School Facility Construction Costs - Permanent Construction			
I. Allowable Building Area			
	A. Total Student Capacity		
	B. Building Area		
	600 students @ 71sf/student		42,600
	Speech/Resource Specialist		600
	Total		43,200
II. Site Requirements			
	A. Purchase Price of Property (10 Acres)		
	Cost per Acre		$0
	B. Appraisals		$0
	C. Costs Incurred in Escrow		$0
	D. Surveys		$0
	E. Other Costs, Geo. and Soils Reports		$0
	Total-Acquisition of Site		$0
III. Plans			
	A. Architect's Fee for Plans		$2,173,690
	B. DSA Plans Check Fee		$169,065
	C. School Planning, Plans Check Fee		$9,243
	D. Preliminary Tests		$8,362
	E. Other Costs, Energy Cons. & Advertising		$62,226
			$2,422,586
IV. Construction Requirements			
	A. Utility Services		$595,164
	B. Off-site Development		$892,744
	C. Site Development, Service		$1,428,389
	D. Site Development, General		$952,259
	E. New Construction		$19,472,832
	F. Unconventional Energy Source		$810,726
	Total Construction		$24,152,114
	Total Items II, III and IV		$26,574,700
	Contingency 10%		$2,657,470
	Construction Tests		$181,141
	Inspection		$241,521
	TOTAL ESTIMATED PROJECT COSTS		**$29,654,832**
	ESTIMATED COST PER STUDENT		**$49,425**
**Source: California Department of Education, Jack Schreder & Associates.*			

Middle School Facility Construction Costs - Permanent Construction			
I. Allowable Building Area			
	A. Total Student Capacity		
	B. Building Area		
	1000 students @ 85sf/student		85,000
	Speech/Resource Specialist		1,360
	Total		86,360
II. Site Requirements			
	A. Purchase Price of Property (20 Acres)		
	Cost per Acre		$0
	B. Appraisals		$0
	C. Costs Incurred in Escrow		$0
	D. Surveys		$0
	E. Other Costs, Geo. and Soils Reports		$0
	Total-Acquisition of Site		$0
III. Plans			
	A. Architect's Fee for Plans		$4,287,237
	B. OSA Plans Check Fee		$333,452
	C. School Planning, Plans Check Fee		$10,611
	D. Preliminary Tests		$11,789
	E. Other Costs, Energy Cons. & Advertising		$90,784
			$4,733,873
IV. Construction Requirements			
	A. Utility Services		$873,189
	B. Off-site Development		$982,715
	C. Site Development, Service		$2,714,467
	D. Site Development, General		$1,936,195
	E. New Construction		$39,742,872
	F. Unconventional Energy Source		$1,386,533
	Total Construction		$47,635,971
	Total Items II, III and IV		$52,369,844
	Contingency		$5,236,984
	Construction Tests		$357,270
	Inspection		$476,360
	TOTAL ESTIMATED PROJECT COSTS		**$58,440,458**
	ESTIMATED COST PER STUDENT		**$58,440**
**Source: California Department of Education, Jack Schreder & Associates.*			

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

APPENDIX C

COMMERCIAL/INDUSTRIAL CALCULATIONS

Cinnabar Elementary School District						
Commercial/Industrial Calculations						
	EMP/	DIST.HH/	HH/SF	% EMP IN	ADJUSTED	ADJ %
	1000 SQ.FT	EMP		EXIST HH	HH/SF	DIST HH/EMP
MEDICAL	4.27	0.2	0.000854	0.202	0.000172508	0.0404
CORP. OFFICE	2.68	0.2	0.000536	0.202	0.000108272	0.0404
COM. OFFICE	4.78	0.2	0.000956	0.202	0.000193112	0.0404
LODGING	1.55	0.3	0.000465	0.202	0.0000939	0.0606
R&D	3.04	0.2	0.000608	0.202	0.000122816	0.0404
IN. PARK	1.68	0.2	0.000336	0.202	0.000067872	0.0404
IN/COM PARK	2.21	0.2	0.000442	0.202	0.000089284	0.0404
NBHD COMM SC	3.62	0.3	0.001086	0.202	0.000219372	0.0606
COMMUNITY SC	1.09	0.3	0.000327	0.202	0.000066054	0.0606
BANKS	2.82	0.3	0.000846	0.202	0.000170892	0.0606
MINI-STORAGE	0.06	0.2	0.000012	0.202	0.000002424	0.0404
AGRICULTURE	0.31	0.5	0.000155	0.202	0.0000313	0.10
STUDENT GENERATION RATE			COST PER STUDENT			
TK-8	0.5000		TK-6	$20,061		
STUDENTS PER SQUARE FOOT						
(YIELD FACTORS X ADJ HH/SQ. FT IN COLUMN F)						
	TK-6					
MEDICAL	0.000086					
CORP. OFFICE	0.000054					
COM. OFFICE	0.000097					
LODGING	0.000047					
R&D	0.000061					
IN. PARK	0.000034					
IN/COM PARK	0.000045					
COM. SC.	0.000110					
COMMUNITY SC	0.000033					
BANKS	0.000085					
MINI STORAGE	0.000001					
AGRICULTURE	0.000016					
COSTS PER SQUARE FOOT						
(STUDENTS/ SQ. FOOT X STUDENT COST/SQ. FOOT IN EACH CATEGORY)						
	TK-6					
MEDICAL	$1.73					
CORP. OFFICE	$1.09					
COM. OFFICE	$1.94					
LODGING	$0.94					
R&D	$1.23					
IN. PARK	$0.68					
IN/COM PARK	$0.90					
COM. SC.	$2.20					
COMMUNITY SC	$0.66					
BANKS	$1.71					
MINI STORAGE	$0.02					
AGRICULTURE	$0.31					

APPENDIX D

PROJECTED DEVELOPMENT SUMMARY

Cinnabar Elementary School District--Projected Development

SF19	MF19	SH19	TOTAL HU	SF40	MF40	SH40	TOTAL HU 2040	Delta HU 2019 - 2040
692	55	0	747	847	84	0	931	**184**

Extracted from the Sonoma County Travel Model 12-2-2022 (6 Traffic Analysis Zones)

Key:

SF *Single Family Housing Units*

MF *Multifamily Housing Units*

SH *Senior/Group Housing Units*

Sonoma County Transportation Authority
Regional Climate Protection Authority

Staff Report

To: **Planning Advisory Committee**

From: **Chris Barney, Senior Transportation Planner**
Tanya Narath, Data Specialist

Item: **Sonoma County Travel Model – Updating General Plan Buildout Estimates**

Date: **10/25/2018**

Issue:

What is the status of Sonoma County Travel Model land use update?

Background:

SCTA maintains a number of different land use scenarios which are used to estimate existing and future travel conditions in Sonoma County. Modeling data products are used directly as part of SCTA's travel demand modeling program, but are also being used with greater frequency to support efforts associated with housing production and fire recovery. Modeling and other data analysis activities are greatly enhanced when the information being used is current and accurate. Existing conditions estimates have already been updated from 2010 - 2015 and staff is in the process of revising general plan build out (GPBO) estimates.

Existing Conditions (2015):

Travel model existing land use conditions have been updated from 2010 to 2015. Assessor's parcel data, information on permitted and completed projects, and other data and estimates from local jurisdictions have been used to complete this update. Existing conditions data is summarized at the parcel level. SCTM existing conditions data outlines the number of housing units, square feet of commercial or industrial uses, hotel rooms, students, hospital rooms, and recreational acres for each parcel. Updated parcel level housing and employment estimates were validated using US Census estimates (American Community Survey, LEHD, etc.), CA Department of Finance housing and demographic projections, State and national employment and school enrollment databases, and other data sources available at the census tract and jurisdiction level

General Plan Buildout Estimates:

SCTA develops and maintains a GPBO scenario as part of the SCTM to provide a future modeling alternative which is more consistent with local planning expectations and documents. MTC/ABAG forecasts, which are used to develop future year land use forecasts for the SCTA Comprehensive Transportation Plan, consider local general plans, land use policies, and zoning in their growth estimates, but also consider market and regional policies that may not be completely consistent with local planning assumptions and published estimates. SCTA staff used the methods and data sources outlined in *Attachment C* to produce GPBO estimates.

These estimates are now out of date and staff are in the process of updating GPBO estimates of future housing and employment growth potential. GPBO estimates broadly represent projected capacity based on land supply, infrastructure, and permitted development. GPBO estimates used by the travel model are summarized at the TAZ level and are calibrated or adjusted to match published build out estimates or ranges found in general plans and other local policy documents (see *Attachment A* for a list of referenced documents).

Staff have completed a review of GPBO housing estimates and have included them for review in *Attachment D*. This table summarizes existing housing, jurisdiction level GPBO housing capacity estimates, and comments outlining the sources that were used to update these estimates. Based on this review, countywide housing capacity has increased by just over 2,500 units (around a 1% increase) from the 2012 GPBO housing estimate. Jurisdiction level changes appear to be relatively minor with a few exceptions. Once summary estimates have been reviewed by local staff, staff will begin the process of allocating potential housing to travel model TAZs using the countywide pending and permitted projects database and the methods and tools outlined in *Attachment C*.

SCTA staff will begin working on updating non-housing GPBO estimates in November. Estimating non-housing related growth capacity is generally more difficult than estimating housing potential. Local planning documents generally provide less information on these types of uses, especially when considering long term capacity. Staff will use information available in general plans, employment forecasts, and the countywide pending and permitted projects database to update GPBO estimates of commercial and industrial square footage, hotel rooms, school enrollments and other non-housing uses. GPBO estimates of non-housing related growth should be available for review by the December PAC meeting.

Policy Impacts:

The GPBO scenario can be analyzed using the Sonoma County Travel Model to estimate project and plan transportation impacts. GPBO estimates have been used to analyze and better understand the regional and countywide housing crisis in Sonoma County.

Fiscal Impacts:

Staff will complete the general plan buildout update in-house and will coordinate with local planning staff to review updated model inputs. No additional fiscal impacts beyond staff time will be required for this update.

Staff Recommendation:

Staff will reach out to each jurisdiction individually to review updated GPBO estimates for their jurisdiction. Please review information provided in Attachments A, B, & D for reasonableness and completeness.

ATTACHMENT A: Summary of Local Planning Documents Reviewed for GPBO Updates

	Documents	**Date**
Cloverdale	General Plan	Adopted May 2009 Last amended January 2015
	Housing Element	December 2014
Cotati	Draft EIR	September 2014
	General Plan	March 2015
	Adopted Housing Element	December 2012
	Housing Element Update Public Draft	April 2015
Healdsburg	General Plan Policy Document	Adopted July 2009 Last amended January 2015
	Housing Element	November 2014
Petaluma	Draft EIR	September 2006
	General Plan 2025	Adopted May 2008 Last amended January 2012
	Housing Element	Adopted December 2014 Last amended November 2015
Rohnert Park	General Plan 8th Edition	Adopted July 2000 Last amended February 2017
	Housing Element	November 2014
	Central Rohnert Park Priority Development Area Plan	March 2016
Santa Rosa	General Plan FEIR	June 2009
	General Plan	November 2009
	Housing Element	July 2014
	Roseland Area Sebastopol Road Specific Plan	November 2016
Sebastopol	General Plan FEIR	July 2016
	General Plan	November 2016
	Housing Element	March 2015
Sonoma	General Plan EIR	September 2006
	General Plan	October 2006
	Housing Element	March 2015
Windsor	General Plan EIR	February 2018
	General Plan	April 2018
	Housing Element	Adopted January 2015 Last amended December 2017
Unincorporated County	Housing Element	December 2014
	Land Use Element	Adopted September 2008 Last amended August 2016

ATTACHMENT B: Local Build-out Assumptions Used in SCTM 2010 Update

Jurisdiction	Build-out Horizon	Density Ratio	Notes
Santa Rosa	2035	Midpoint	Provided TAZ level build-out last update.
Petaluma	2025	varies by use	Within UGB to 2018, expansion of UGB after 2018. Data provided at TAZ level last update.
County	2020	Res. - varies by use, near or at max. density. Non-res. – max. adjusted down based on identified constraints	Residential holding capacity provided at parcel level, non-res at TAZ level last update.
Cloverdale	2025	72% Res., 40% Non-res.	From GP EIR
Healdsburg	2030	Development Potential varies by site	Calculated by city staff. Provided at parcel level last update.
Windsor	2015	Midpoint	Max. allowable density also calculated. Data provided at parcel level last update.
Sebastopol	2013	Non-res. - max 75% of potential acres, Res. - max of 25 units/year	Growth management plan determines maximum residential development.
Rohnert Park	2020	Res. - max for all but MF, Non-res. greater than 50%, but less than max.	
Cotati	2015	varies by site	
Sonoma	2020	maximum build-out potential	From GP

ATTACHMENT C: GPBO Methodology and Data Sources:

Countywide Build-out Model:

Build-out data is not available at the TAZ or parcel level for all jurisdictions. Staff developed a simple GIS model to estimate build-out at the TAZ level for areas for which no locally generated build-out information is available. A basic outline of the general plan build-out estimation model is provided below:

1. Update GIS layer to incorporate local zoning code including the following information:
    a. Min/max units per acre.
    b. Maximum Floor Area Ratio (FAR) for commercial, industrial, and institutional land
    c. Generalized land use designation

2. Transfer zoning information to existing land use parcel layer.

3. Calculate parcel level maximum build-out using zoning designation:

    Housing: Parcel acres * maximum housing units per acre
    Non housing: Parcel square feet * maximum FAR

4. Calculate remaining capacity/development potential by subtracting existing uses from calculated maximum build-out. Summarize development potential/capacity at the Traffic Analysis Zone (TAZ) level.

    Development potential = Calculated Maximum build-out - Existing Land Use

5. Gather most current published General Plan build out by use from General Plans or GP EIRs to use as city-wide control total for build-out calculations.

    Jurisdictional Build-out Control Total (by land use type) = published number by land use type.

6. Update general plan build-out control total to include build-out published in area specific plans, specific area plans, or other localized planning documents which provide more detailed information on desired or permitted development for subsections of the city/jurisdiction. These subarea plans are generally detailed enough that ASP/SAP control totals can be assigned to individual or a few TAZs.

7. Assign ASP/SAP build-out growth to individual TAZs and subtract ASP/SAP TAZ level control totals from the citywide/jurisdictional control total. Use calculated development potential for TAZs to assign build-out for specific plan areas which cover multiple TAZs.

    Example: A SAP indicates that 100 single family homes may be built in the plan area. The plan area spans 2 traffic analysis zones (zones 3 & 4). Using zoning code and parcel area information, zone 3 has capacity for 150 new single family homes, and zone 4 has capacity for 50 new single family homes. Zone 3 contains 75% of calculated capacity and zone 4 contains 25% of calculated capacity, so 75 single family

homes are assigned to zone 3 and 25 single family homes are assigned to zone 4 in the build out scenario using this methodology.

General Plan Build-out Estimation Model Input Data and Data Sources:

1. *Countywide Planned Land Use Layer* – This GIS polygon layer summarizes zoning policy at the county level.
2. *Countywide Parcel Base* – Zoning restrictions can be applied to each parcel to determine development capacity for each parcel. Development capacity for each parcel was compared to existing development on each parcel to determine development potential beyond existing conditions.
3. *Local General and Area Specific Plans* – Local general and area specific plans were consulted to determine development minimum or maximums for different types of land uses in specific zoning areas. Zoning typically uses housing units, sq. ft., or floor area ratios as metrics of development.
4. *Existing build-out calculations or assumptions regarding infrastructure requirements for development* - Most jurisdictions do not use 100% build-out in their calculations. They generally default to 50-70% of maximum build-out to account for infrastructure and parking. *Attachment B* outlines local approaches to calculating build-out potential.