DEVELOPMENT FEE JUSTIFICATION STUDY/ SCHOOL FACILITIES NEEDS ANALYSIS

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TABLE OF CONTENTS

SECTION 1

INTRODUCTION AND FINDINGS

INTRODUCTION

School districts are authorized to collect fees on new residential and commercial/industrial development in accordance with Education Code Section 17620 and Government Code Section 65995. The traditional development fees (referred to as "Level 1" fees) are currently capped at $5.17 per square foot for residential development and $0.84 per square foot for commercial/industrial development.

For many districts, the maximum Level 1 residential fee amount is inadequate to fully fund the needed facilities. Pursuant to Government Code Sections 65995.5, 65995.6, and 65995.7, which became effective November 4, 1998, districts can charge alternative fees (referred to as "Level 2" and "Level 3" fees) that exceed the Level 1 maximum fee of $5.17 per square foot. The Level 2 fee is intended to provide up to one-half the cost of providing school facilities for students from new development, with state funding under the Leroy F. Greene School Facilities Act of 1998 providing the other one-half. The Level 3 fee, which is intended to fully fund the cost of school facilities, is only applicable if state funds for new facility construction are not available.[1]

To be eligible to impose Level 2 or Level 3 fees, Government Code Section 65995.5(b) states that a school district must satisfy three separate requirements.

(1) The district must make timely application to and be determined to be eligible by the State Allocation Board for new school facility construction funding.

(2) The district must satisfy at least two of four alternative conditions set forth in Government Code Section 65995.5 (b)(3). The four alternative conditions are:

   (a) the district has substantial enrollment on a multi-track year-round schedule;

   (b) the district has placed a local general obligation bond measure for school facilities on the ballot in the last four years that received at least 50 percent plus one vote;

   (c) the district has issued debt or incurred obligations for capital outlay in an amount equivalent to 15 percent of its local bonding capacity; or in an amount equivalent to 30 percent of such local bonding capacity, if special taxes levied pursuant to Chapter 2.5 (commencing with Section 53311) of Division 2 of Title 5, approved by a vote of landowners after November 4, 1998, are included in the repayment of indebtedness;

   (d) at least 20 percent of the district's teaching stations are relocatable classrooms.

[1] Pursuant to Government Code Section 65995.7(b), state funds are considered not available if the State Allocation Board is no longer approving apportionments for new construction pursuant to Article 5 (commencing with Section 17072.20) of Chapter 12.5 of Part 10 of the Education Code due to a lack of funds available for new construction.

(3) The district must conduct and adopt a school facilities needs analysis pursuant to Government Code Section 65995.6. The needs analysis identifies school facilities needs and determines the Level 2 fee using a prescribed methodology. Because the Level 2 methodology requires use of state standard allowances for site size and construction costs, the resulting Level 2 fee is typically conservative, but may still provide more funding for the district than the capped Level 1 fee.

With respect to the above requirements, the District has been determined by the State Allocation Board to meet the eligibility requirements for new school construction funding. In addition, the District has issued debt or incurred obligations for capital outlay in an amount equivalent to 15 percent of its local bonding capacity and the District has placed a local general obligation bond measure for school facilities that has received at least 50 percent plus one vote . Finally, at least 20 percent of the District's teaching stations are relocatable classrooms.

This study is organized into three sections:

- Section 1 sets forth the purpose of the study and the findings necessary to charge development fees;
- Section 2 determines the justifiable residential development fees; and
- Section 3 determines the justifiable commercial/industrial development fees by category of development.

FINDINGS

This Development Fee Justification Study/School Facilities Needs Analysis provides the information and analysis necessary to demonstrate that the Clovis Unified School District is justified in collecting Level 1 fees on new residential and commercial/industrial development ($5.17 and $0.84 per square foot, respectively), and Level 2 and Level 3 fees of $5.86 per square foot and $11.73 per square foot for residential development, respectively. As required by Government Code Section 66001, this study demonstrates the following:

a. New residential and commercial/industrial development relates directly to the need for school facilities in the District.

- Based upon past development activity and reasonable future projections, an additional 6,750 single family residential units, 1,950 multiple family residential units and approximately 1.92 million square feet of commercial/industrial development will be constructed in the District during the next five years (see Section 2, Step 1 and Appendix 5).
- Students will be generated by new residential and commercial/industrial development. Single family residential development generates an average of .5530 grades TK-12 students per unit (see Section 2, Step 2). Multiple family development generates an average of .2002 TK-12 students per unit. Commercial and industrial development generates between .029 and .193 students per 1,000 square feet, depending on category of development (see Section 3, Table 19).
- New development is expected to generate approximately 4,124 additional students in the District during the next five years, including 2,412 students in grades TK-6, 586 students

in grades 7-8, 998 students in grades 9-12, and 128 Special Day Class (SDC) students (see Section 2, Step 2).

b. The District needs additional school facilities to accommodate students from new development.

- The District does not have existing capacity to accommodate projected students from new development. Therefore, the District will need additional school facilities during the next five years for approximately 2,412 students in grades TK-6, 586 students in grades 7-8, 998 students in grades 9-12, and 128 SDC students (see Section 2, Steps 3 and 4).

c. The amount of the fees charged is reasonably related to the need attributable to new development projects.

- This report justifies a Level 2 fee of $5.86 per square foot and a Level 3 fee of $11.73 per square foot. The Level 2 fee is intended to provide 50 percent, and the Level 3 fee 100 percent, of the cost of providing school facilities for students from new development using prescribed state cost allowances. Therefore, the fees are reasonably related to the cost of facilities attributable to new development projects. However, the specific and limited methodology required to be used in the Level 2 and Level 3 fee calculations falls short of providing 50 percent or 100 percent, respectively, of the true cost to the District for providing facilities for students from new development.
- The residential fee per square foot justified by this report to fully fund the cost of providing school facilities to students from new development is $26.11 per square foot. (see Section 2, Step 8). The maximum allowable Level 1 residential fee ($5.17 per square foot) falls substantially short of funding the full cost of providing school facilities to students from new development.
- A fee on commercial and industrial development may be charged as a supplement to the residential fee if the residential fee does not cover the cost of providing school facilities to students from new development. The justifiable fees for commercial and industrial development by category are presented in Section 3, Table 19, which shows that the maximum commercial/industrial fee of $0.84 per square foot can be justified in all categories.

SECTION 2

RESIDENTIAL FEE JUSTIFICATION

INTRODUCTION

This section presents a step-by-step calculation of the school facilities fees that can be justified for new residential development in the District. The more restrictive Level 2 fee methodology is used in accordance with the requirements of Government Code Sections 65995.5 and 69995.6 through Step 7 to calculate the Level 2 fee. The Level 3 fee is calculated in Step 8. Finally, the Level 1 fee is then calculated in Step 9, using the cost factors appropriate for Level 1 fee justification.

STEP 1: PROJECT NUMBER OF NEW RESIDENTIAL UNITS

The first step in the analysis is to project the number of residential units to be constructed in the District during the next five years. This can be estimated by evaluating recent development activity and current proposals in the District, as well as local agency plans and projections for future development activity.

Single and multiple family residential permit activity for the past fifteen years (2009-2023) are shown on Chart 1 and Table 1 (on the following page). Table 1 indicates that building permits were issued for an average of 1,185 single family units and 270 multiple family units per year during this period. The highest levels of single family activity occurred during the past five years (2019- 2023), averaging 1,478 units per year. This is substantially higher than the fifteen-year average of 1,185 units per year and the ten-year average of 1,348 units per year. The lowest level of single family permit activity occurred from 2009-2012, reflecting the effects of the great recession and poor housing market conditions.

Similar to single family permit activity, the highest number of multiple family units have been permitted during the past five years, with an average of 485 units per year, as compared to the ten-year average of 391 units per year and the fifteen-year average of 270 units per year.

The District has a substantial amount of land available for future development. Full development of the areas planned for urban development within the general plans of the Cities of Fresno and Clovis and Fresno County would increase the population of the District by approximately 195,000.

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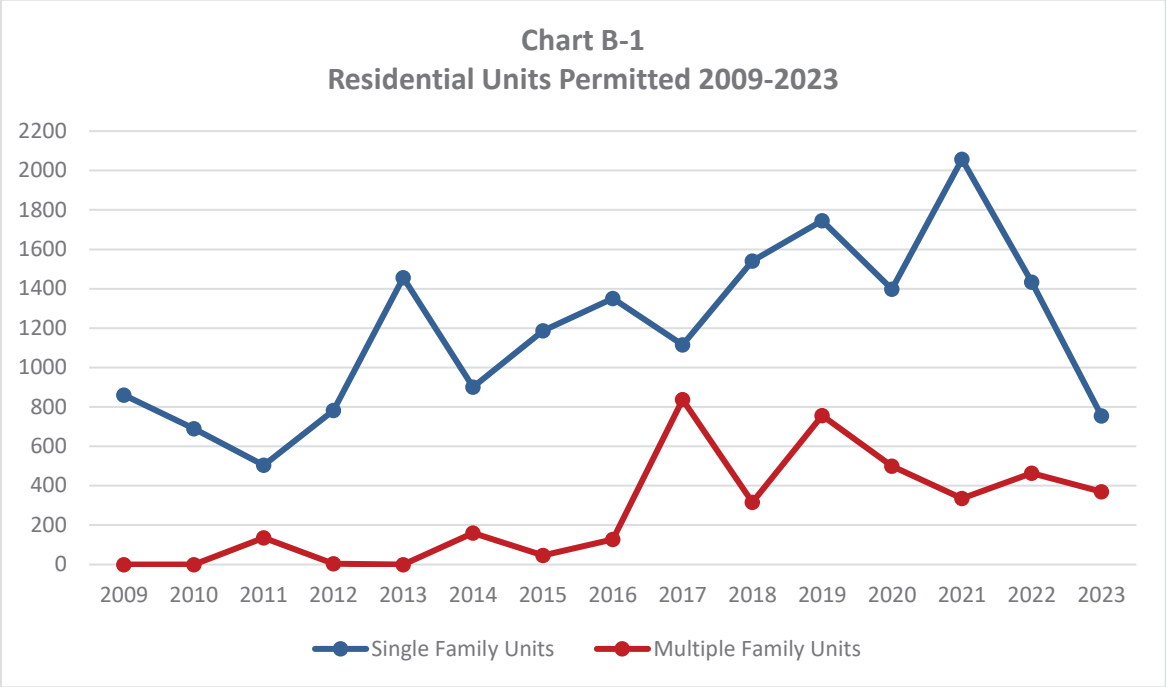

TABLE 1
CLOVIS UNIFIED SCHOOL DISTRICT
RESIDENTIAL UNITS PERMITTED 2009-2023

Year	Single Family Units	Multiple Family Units
2009	860	0
2010	689	0
2011	504	136
2012	782	4
2013	1,457	0
2014	901	160
2015	1,187	47
2016	1,350	128
2017	1,116	837
2018	1,540	316
2019	1,746	757
2020	1,398	500
2021	2,057	335
2022	1,434	464
2023	754	370
5-Year Average	1,478	485
10-Year Average	1,348	391
15-Year Average	1,185	270

Source: CUSD Fee Certificate Records; City of Fresno, City of Clovis Building Permit Records

Both single family and multiple family development activity have been strong in the District during the past five years. The majority of residential development activity in the Fresno/Clovis metropolitan areas is occurring in the District and this is expected to continue. Last year, the District saw an unusual decline in single-family residential permits. This drop is perceived to be a culmination of factors coming together at once, including environmental and VMT challenges, utility infrastructure delays, a historically wet winter delaying housing starts and rising interest rates. Although these factors have had a dampening effect on housing construction, the District's educational reputation, the desirability of the community as a place to live, and the relatively low cost of housing compared to many areas of the state will likely assure a substantial level of development activity in the District.

The housing unit projections in the District for the next five years are shown in Table 2. The preceding paragraph, this study projects that the rate of housing development will approximate the ten-year average (1,350 single family units and 390 multiple family units per year). Using the ten-year average aligns with the District's past practice in recent years and maintains our consistent methodology.

TABLE 2
CLOVIS UNIFIED SCHOOL DISTRICT
PROJECTED RESIDENTIAL DEVELOPMENT
(NEXT FIVE YEARS)

Single Family Units		Multiple Family Units	
Five Year Total	Average	Five Year Total	Average
6,750	1,350	1,950	390

Source: Clovis Unified School District, 2024

STEP 2: PROJECT NUMBER OF STUDENTS GENERATED BY NEW RESIDENTIAL UNITS

The number of students generated by residential units constructed during the next five years is projected by multiplying the student generation rates for residential development in the District by the number of units projected in Step 1. The student generation rates used for projected residential units in the District are shown in Table 3. The methodology used by the District to determine the student generation rates is detailed in Appendix 1.

TABLE 3
CLOVIS UNIFIED SCHOOL DISTRICT
STUDENT GENERATION RATES

Grade Level	Single Family Units	Multi-Family Units
Elementary (TK-6)	.3346	.1205
Intermediate School (7-8)	.0814	.0259
High School (9-12)	.1370	.0538
Total (TK-12)	.5530	.2002

Source: Clovis Unified School District, 2024

Table 4 shows the projected number of students generated by residential units constructed during the next five years. As indicated in the table, residential unit construction during this time period is anticipated to generate 2,494 elementary school students, 600 intermediate school students and 1,030 high school students.

TABLE 4
CLOVIS UNIFIED SCHOOL DISTRICT
STUDENTS GENERATED BY NEW RESIDENTIAL UNITS
(FIVE-YEAR PERIOD)

Grade Level	Number of Units	Student Generation Rate	New Development Students
Single Family Units			
TK-6	6,750	.3346	2,259
7-8	6,750	.0814	549
9-12	6,750	.1370	925
Multiple Family Units			
TK-6	1,950	.1205	235
7-8	1,950	.0259	51
9-12	1,950	.0538	105
Total Students			
TK-6			2,494
7-8			600
9-12			1,030

Source: Clovis Unified School District, 2024

The number of students generated in Table 4 is adjusted in Table 5 to account for the number of Special Day Class (SDC) students that would be generated by new development.[2] Based upon the existing percentage of SDC students in each grade grouping (3.29 percent for grades TK-6, 2.27 percent of grades 7-8, and 3.07 percent for grades 9-12), Table 5 estimates that new development would generate 128 SDC students: 82 in grades TK-6, 14 in grades 7-8, and 32 in grades 9-12. Therefore, the net number of students generated by new development, less SDC students, would be 2,412 in grades TK-6, 586 in grades 7-8, and 998 in grades 9-12.

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[2] All SDC students referred to in this report are SDC Severe students. For purposes of the state facilities program, the District does not categorize SDC Non-severe students.

TABLE 5
CLOVIS UNIFIED SCHOOL DISTRICT
SDC STUDENTS GENERATED BY RESIDENTIAL UNITS

Grade Level	Students Projected In Table 4	SDC Percentage	SDC Students	Table 4 Students Less SDC
TK-6	2,494	3.29%	82	2,412
7-8	600	2.27%	14	586
9-12	1,030	3.07%	32	998
Total SDC			128	

Source: Clovis Unified School District, 2024

STEP 3: DETERMINE AVAILABLE FACILITIES CAPACITY FOR NEW DEVELOPMENT STUDENTS

The District's school building capacity was determined to be 22,766 for grades TK-6, 6,561 for grades 7-8, 12,135 for grades 9-12 and 324 for SDC Severe (see Appendix 2).

Section 65995.6(b)(2) of the Government Code requires that the analysis "identify and consider the extent to which projected enrollment growth may be accommodated by excess capacity in existing facilities." To determine whether there is any excess capacity to house new development students, Table 6 compares the current District enrollment (2023-24 school year) in each grade grouping to the existing school building capacity. As shown by Table 6, the District needs capacity for 60 students in grades TK-6, 171 students in grades 7-8, 727 students in grades 9-12, and 939 SDC Severe students.

Currently, transitional kindergarten (or "TK") serves children who turn 5 years old between September 2 and April 2. In July 2021, SB 130 was signed into law which detailed the rollout of Universal TK to school districts. With its expansion, TK will be available to all 4-year-olds through a phased roll-out through the 2025-26 school year. It is projected that this grade level expansion will require an additional 1,100 students to be housed by the District. This amount is reflected in the capacity needed for grades TK-6.

TABLE 6
CLOVIS UNIFIED SCHOOL DISTRICT
AVAILABLE FACILITIES CAPACITY FOR NEW DEVELOPMENT STUDENTS

Grade Level	Facilities Capacity	District Enrollment	Projected UTK Enrollment	Available Capacity or (Capacity Needed)
TK-6	22,766	21,726	1,100	(60)[3]
7-8	6,561	6,732	N/A	(171)
9-12	12,135	12,862	N/A	(727)
SDC Severe	324	1,263	N/A	(939)

Source: Clovis Unified School District, 2024

[3] TK-6 capacity needed includes an additional 1,100 students projected to be housed as a result of the TK expansion.

STEP 4: DETERMINE NUMBER OF UNHOUSED STUDENTS GENERATED BY NEW DEVELOPMENT

The number of unhoused students from new development for the next five years is determined in Table 7 by subtracting any available capacity in Table 6 from the number of students generated by new development. Since there is no capacity available in grades TK-6, grades 7,8, 9-12 and SDC Severe, all of the projected new development students in these grade levels are considered unhoused.

TABLE 7
CLOVIS UNIFIED SCHOOL DISTRICT
UNHOUSED STUDENTS GENERATED BY NEW DEVELOPMENT

Grade Level	New Development Students	Available Capacity	Unhoused Students
TK-6	2,412	0	2,412
7-8	586	0	586
9-12	998	0	998
SDC Severe	128	0	128

Source: Clovis Unified School District, 2024

STEP 5: CALCULATE ALLOWABLE SCHOOL FACILITIES COST FOR UNHOUSED NEW DEVELOPMENT STUDENTS

The cost of school facilities is broken down into three categories: building construction, site acquisition and site development. The allowable District cost of school building construction for unhoused students from new development is calculated by multiplying the number of new development students needing facilities by the per student cost allowances specified in Education Code Section 17072.10(a), as annually adjusted by the State Allocation Board.[4]

As indicated by Table 8, the total allowable District building construction cost for unhoused students generated by new development during the next five years is $76,040,950.

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[4] The per student cost allowances are intended to provide the District's 50 percent share of the cost of facilities, with the remaining 50 percent provided by the state building program. The actual District cost for school facilities is greater than the state allowances. The allowances used in this report include the adjusted additional grants for new fire protection system requirements, as authorized by the State Allocation Board.

TABLE 8
CLOVIS UNIFIED SCHOOL DISTRICT
ALLOWABLE BUILDING CONSTRUCTION COST FOR
UNHOUSED NEW DEVELOPMENT STUDENTS

Grade Level	Unhoused Students	Cost Allowance Per Student	Allowable Cost
TK-6	2,412	$16,053	$38,719,836
7-8	586	$17,019	$9,973,134
9-12	998	$21,602	$21,558,796
SDC Severe	128	$45,228	$5,789,184
Total			$76,040,950

Source: Clovis Unified School District, 2024; State Allocation Board, February 2024.

Government Code Section 65995.5(c)(1) allows site acquisition and development costs to be added to the building construction cost for new development students. According to Section 65995.5(h), "site acquisition costs shall not exceed half of the amount determined by multiplying the land acreage determined to be necessary under the guidelines of the State Department of Education, as published in the 'School Site Analysis and Development Handbook,' as that handbook read as of January 1, 1998, by the estimated cost determined pursuant to Section 17072.12 of the Education Code. Site development costs shall not exceed the estimated amount that would be funded by the State Allocation Board pursuant to its regulations governing grants for site development costs."

The allowable site acquisition costs are estimated by the District to be $1,385 per elementary school student, $1,505 per intermediate and high school student and $1,437 per SDC student (see Appendix 3). (Intermediate and high schools are constructed on combined sites). The allowable site acquisition costs are based upon the guidelines of the State Department of Education's School Site Analysis and Development Handbook as of January 1, 1998 and the loading factors specified in the Leroy F. Greene School Facilities Act of 1998.

The District currently owns four future elementary school sites (Minnewawa-Perrin, Minnewawa-International, and an elementary site in the Millerton Specific Plan Area) as well as the Bradley Educational Center site, which would accommodate a future high school, intermediate school, and elementary school. The District, therefore, has school site capacity for all projected students in all grade levels, and thus no site acquisition costs are included in this report.

The allowable site development costs are estimated to be $6,517 per elementary school student, $5,881 per intermediate school student, $5,676 per high school student, and $6,196 per SDC student (see Appendix 3). The allowable site development costs are based upon the items listed under Section 1859.76 of the OPSC Regulations relating to the Leroy F. Greene School Facilities Act of 1998, as applied to District schools and the loading factors specified in the act.

Table 9 shows that the total allowable District site development cost to accommodate projected students from new development is $25,579,838.

TABLE 9
CLOVIS UNIFIED SCHOOL DISTRICT
ALLOWABLE SITE DEVELOPMENT COST FOR
UNHOUSED NEW DEVELOPMENT STUDENTS

Grade Level	Unhoused Students	Cost Per Student	Allowable Cost
TK-6	2,412	$6,517	$15,719,004
7-8	586	$5,851	$3,428,686
9-12	998	$5,646	$5,634,708
SDC Severe	128	$6,230	$797,440
Total			$25,579,838

Source: Appendix 3

The total allowable school facilities cost to accommodate students generated by new development during the next five years is shown on Table 10. The total cost was determined to be $101,620,788.

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TABLE 10
CLOVIS UNIFIED SCHOOL DISTRICT
TOTAL ALLOWABLE SCHOOL FACILITIES COST
FOR UNHOUSED NEW DEVELOPMENT STUDENTS

Type of Cost	Allowable Cost
Building Construction	$76,040,950
Site Acquisition	$0
Site Development	$25,579,838
Total	$101,620,788

The development fees collected by the District may be used for construction and reconstruction of school facilities, site development, relocatable classrooms on existing or future sites and other facilities necessitated by students generated by new development. Probable school facilities projects over the next five years include construction of a new intermediate school and high school and the purchase and relocation of portable classroom facilities, as needed.

STEP 6: DETERMINE DEDICATED LOCAL FUNDS

Pursuant to Section 65995.5(c)(2), the full amount of any local funds the District Board has dedicated to school facilities necessitated by students from new development must be subtracted from the cost determined in Step 5. In November 2020, the voters of the District approved a $335 million bond measure ("Measure A") to maintain neighborhood schools, upgrade security/health measures and avoid overcrowding by: building, modernizing, and repairing school and career/vocational facilities. Bonds from Measure A are sold as development occurs and the need arises. The District projects it will have approximately $280 million in bond funds available for school facilities within the five year time frame of this analysis.

In addition to local bond funds, the District has interest on investments and existing school facilities fees. The District's estimated local funds are shown in Table 11.

TABLE 11
CLOVIS UNIFIED SCHOOL DISTRICT
LOCAL FUNDING SOURCES FOR FACILITIES

Category	Amount
Local Bonds	$280,000,000
Interest on Investments	$2,109,000
School Facilities Fees	$962,000
Total	$283,071,000

Source: Clovis Unified School District, 2024

Table 12 shows a breakdown of how the $283,071,000 in local funds is to be allocated: $193,477,800 for new schools and sites, $73,793,200 for non-academic facilities, $3,500,000 for building remodels and upgrades, and $12,300,000 for site improvement projects.

TABLE 12
CLOVIS UNIFIED SCHOOL DISTRICT
LOCAL FUNDING ALLOCATION FOR FACILITIES

Category	Cost
New Schools and Sites	$193,477,800
Non-Academic Facilities	$73,793,200
Building Remodels and Upgrades	$3,500,000
Site Improvement Projects	$12,300,000
Total	$283,071,000

Source: Clovis Unified School District, 2024

Based upon Table 12, the District has $193,477,800 in local funding to put towards new schools and sites. However, there are costs that will count against this amount, as shown in Table 13. Table 6 of this report indicates that the District needs capacity for the following number of existing unhoused students: 60 in grades TK-6, 171 in grades 7-8, 727 in grades 9-12, and 939 SDC Severe. Using the cost factors in this report, the cost of facilities for existing unhoused students would amount to $193,245,082. The District will also incur portable classroom relocation costs over the next five years, which the District estimates at $7,500,000.

Table 13 indicates that when the listed items are deducted from the funding available for new schools and sites, no local funding would remain to defray facilities costs for new development students.

TABLE 13
CLOVIS UNIFIED SCHOOL DISTRICT
NET LOCAL FUNDING AVAILABLE FOR NEW DEVELOPMENT STUDENTS

Category	Cost
New Schools and Sites	$193,477,800
Facilities Costs for Existing Unhoused Students	($193,245,082)
New Portables Costs	($7,500,000)
Net Local Funds Remaining	($7,267,282)

Source: Clovis Unified School District, 2024

STEP 7: CALCULATE LEVEL 2 FEE

In accordance with Government Code section 65995.5(c)(3), the District's Level 2 fee is calculated by dividing the allowable school facilities cost for new development students determined in Step 5 (Table 10) by the projected total square footage of assessable space of residential units anticipated to be constructed during the next five years. The total square footage for residential units projected to be constructed in the District is presented in Table 14. This was determined by multiplying the respective average square footage of single family and multiple family units developed in the District by the projected number of units determined in Step 1.

TABLE 14
CLOVIS UNIFIED SCHOOL DISTRICT
PROJECTED RESIDENTIAL SQUARE FOOTAGE
(FIVE-YEAR PERIOD)

Number/Type of Units	Average Square Footage Per Unit*	Total Square Footage Constructed
6,750 Single Family	2,250	15,187,500
1,950 Multiple-Family	1,100	2,145,000
Total		17,332,500

Source: Clovis Unified School District Fee Certificates

Table 15 calculates the Level 2 fee by dividing the allowable school facilities cost for projected students generated by new residential development (Table 10) by the projected residential square footage determined in Table 14. The resulting Level 2 residential fee is $5.86 per square foot.

TABLE 15
CLOVIS UNIFIED SCHOOL DISTRICT
LEVEL 2 FEE CALCULATION

Allowable Cost for New Development Students	Projected Residential Square Footage	Cost Per Square Foot (Level 2 Fee)
$101,620,788	17,332,500	$5.86

Source: Clovis Unified School District, 2024

STEP 8: CALCULATE LEVEL 3 FEE

For the Level 3 fee, Government Code Section 65995.7(a) provides that if state funds for new facility construction are not available, a district that complies with Section 65995.5 may increase the alternative fee by an amount not to exceed the amount determined previously in Step 7, except for purposes of calculating this additional amount, local funds do not have to be subtracted from the facilities costs for new development students. The Level 3 fee is calculated in Table 16 by dividing the 100 percent state-allowed facilities costs by the projected residential square footage. The potential Level 3 fee is $11.73 per square foot.

TABLE 16
CLOVIS UNIFIED SCHOOL DISTRICT
LEVEL 3 FEE CALCULATION

100 Percent State-Allowable Facilities Costs for New Development Students	Projected Residential Square Footage	Cost Per Square Foot (Level 3 Fee)
$203,241,576	17,332,500	$11.73

Source: Clovis Unified School District, 2024

STEP 9: CALCULATE LEVEL 1 FEE

In the preceding steps, the Level 2 fee was determined using 50 percent of the cost to provide facilities for students from new development based on state prescribed costs, and the Level 3 fee was determined based on 100 percent of state prescribed costs. The Level 1 fee, however, is calculated using the full District cost of school facilities, as shown in Appendix 4. The full cost of school facilities to serve projected unhoused students from new development during the next five years ($452,559,141) is calculated in Table 17, on the following page.

Table 18 calculates the Level 1 fee by dividing the full school facilities cost for projected unhoused students generated by new residential development (Table 17) by the projected residential square footage determined in Table 14. The resulting Level 1 residential fee justified is $26.11 per square foot. The Level 1 fee, however, is currently capped by the state at a maximum of $5.17 per square foot. Therefore, $5.17 per square foot is the highest Level 1 fee that the District can charge. (Note: If a Level 2 or 3 fee is charged by a district, the Level 2 or 3 fee applies to new residential units, and the Level 1 fee would only apply to residential additions greater than 500 square feet. Additions of 500 feet or less are exempt from fees.)

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TABLE 17
CLOVIS UNIFIED SCHOOL DISTRICT
FULL COST TO PROVIDE FACILITIES FOR UNHOUSED
NEW DEVELOPMENT STUDENTS

Grade Level	Number of Students	Cost Per Student	Total Cost
School Facilities Cost			
TK-6	2,412	$90,351	$217,926,612
7-8	586	$134,492	$78,812,312
9-12	998	$134,492	$134,223,016
SDC Severe	128	$169,434	$21,687,552
Site Acquisition Cost			
TK-6	0	$4,244	$0
7-8	0	$3,810	$0
9-12	0	$3,810	$0
SDC Severe	0	$4,067	$0
Total Cost			
TK-6			$217,926,612
7-8			$78,812,312
9-12			$134,223,016
SDC Severe			$21,687,552
Total			$452,649,492

Source: Appendix 4; Clovis Unified School District, 2024

TABLE 18
CLOVIS UNIFIED SCHOOL DISTRICT
LEVEL 1 FEE CALCULATION

Full Facilities Cost for New Development Students	Projected Residential Square Footage	Cost Per Square Foot (Level 1 Fee)
$452,559,141	17,332,500	$26.11

Source: Clovis Unified School District, 2024

SECTION 3

COMMERCIAL/INDUSTRIAL FEE JUSTIFICATION

INTRODUCTION

This section presents a step-by-step explanation of the methodology used to determine the District's commercial/industrial development fees, as shown in Table 19. The maximum commercial/ industrial fee that can be charged pursuant to Education Code Section 17620 and Government Code Section 65995 is $0.84 per square foot.

STEP 1: DETERMINE SQUARE FOOTAGE PER EMPLOYEE

Commercial and industrial development generates employees, and the children of employees living in the District will need to be housed in District schools. The number of employees per 1,000 square feet generated by various types of commercial and industrial development is shown in Table 19.[1]

STEP 2: DETERMINE NUMBER OF STUDENTS PER EMPLOYEE

The average number of students per employee was determined by using U.S. Census Bureau 2022 American Community Survey (ACS) data for the Clovis Unified School District and CBEDS enrollment information from the California Department of Education (CDE) DataQuest web site. According to ACS data, there were 108,385 civilian employed persons residing in the District. The CDE web site indicates that 41,989 students were enrolled in grades TK-12 in the District during 2022-23. This calculates to a ratio of 0.387 students per employee. This ratio, however, must be further adjusted by including only the estimated percentage of employees that would move into the District as a result of employment opportunities (10.7 percent)[2] The discounted student per employee ratio, therefore, is 0.041 (10.7 percent of 0.387).

STEP 3: CALCULATE STUDENT GENERATION RATE PER 1,000 SQUARE FEET

The student generation rate per 1,000 square feet of commercial/industrial development in each category was calculated by multiplying the number of employees per 1,000 square feet by the number of students per employee. (The numbers are presented per 1,000 square feet rather than per square foot for ease of presentation and data manipulation.)

[1] Employee density data from the San Diego Association of Governments (SANDAG) Traffic Generators Manual is used in Table 19, as allowed by law.

[2] Based on U.S. Census Bureau American Community Survey 2022 5-Year Data Profiles

TABLE 19

Clovis Unified School District
COMMERCIAL/INDUSTRIAL FEE CALCULATION

Category	Employees Per 1,000 Square Feet	Students Per Employee	Students Per 1,000 Square Feet	Facilities Cost Per Student	Cost Per Square Foot	Residential Offset	Net Cost Per Square Foot (Justifiable Fee)
Warehouse	0.70	0.041	0.029	$109,760	$3.15	$0.71	$2.44
Lodging	1.11	0.041	0.046	$109,760	$5.00	$1.12	$3.87
Industrial Park	1.68	0.041	0.069	$109,760	$7.56	$1.70	$5.86
Community Shopping Center	1.74	0.041	0.071	$109,760	$7.83	$1.76	$6.07
Corporate Office	2.68	0.041	0.110	$109,760	$12.06	$2.71	$9.35
Neighborhood Shopping Center	2.80	0.041	0.115	$109,760	$12.60	$2.83	$9.77
Bank	2.83	0.041	0.116	$109,760	$12.74	$2.86	$9.88
Scientific Research & Development	3.04	0.041	0.125	$109,760	$13.68	$3.07	$10.61
Business Park	3.73	0.041	0.153	$109,760	$16.79	$3.77	$13.02
Medical Office	4.27	0.041	0.175	$109,760	$19.22	$4.31	$14.90
Commercial Office	4.71	0.041	0.193	$109,760	$21.20	$4.76	$16.44

Note: Distribution of cost per square foot between the residential offset and the net cost per square foot may not sum precisely due to rounding.
Source: SANDAG Traffic Generators Manual, 1990; U.S. Census American Community Survey, 2022; Clovis Unified School District, 2024

STEP 4: DETERMINE SCHOOL FACILITIES COST PER STUDENT

The average cost of school facilities per student is $109,760 and was determined by dividing the cost of providing facilities for new development students determined in Section 2, Table 17 ($452,649,492) by the 4,124 new development students needing facilities (total number of unhoused students in Table 7).

STEP 5: CALCULATE COST PER SQUARE FOOT

The school facilities cost per square foot for each commercial/industrial category was calculated by multiplying the student generation rate per 1,000 square feet by the average school facilities cost per student, and then dividing the product by 1,000.

STEP 6: CALCULATE RESIDENTIAL OFFSET

When employees are generated in the District as a result of new commercial/industrial development, fees will also be charged on the new residential units occupied by the employees and students generated by commercial/industrial development. To prevent a commercial or industrial development from paying for the portion of the impact that will be covered by the residential fee, this amount has been calculated and deducted from each category. This is referred to as the "residential offset" and is intended to avoid any possibility of overpayment for the same student impact. The residential offset amount is calculated by multiplying the following factors together and dividing the total by 1,000 (to convert from cost per 1,000 square feet to cost per square foot):

- The student generation rate per 1,000 square feet of commercial/industrial development.
- The number of dwelling units constructed for each student. This is 2.11, which is derived by taking the weighted average student generation rate for projected single and multiple family residential development (0.474) and dividing it into one.
- The average square feet per dwelling unit (1,992). This is the weighted average square footage of projected single and multiple family units, assuming that 77.6 percent of future units will be single family and that 22.4 percent of future units will be multiple family (see Table 2).
- The maximum residential fee that could be charged by the District ($5.86 per square foot Level 2 fee).

STEP 7: DETERMINE NET COST PER SQUARE FOOT (JUSTIFIABLE FEE)

After subtracting the residential offset, the net justifiable fee for all categories of commercial/ industrial development in Table 19 exceeds the maximum statutory fee of $0.78 per square foot in all categories.

APPENDICES

APPENDIX 1

STUDENT GENERATION RATE METHODOLOGY

The student generation rates for new residential units were determined by the District using a methodology in which the addresses for dwelling units constructed in the District during the past five years (based on data obtained using the ParcelQuest-Online program) were sorted against the addresses of all enrolled students. Separate sorts for single family and multiple family units were conducted so that generation rates for each type of unit could be determined. The number of students found to be residing in the units was divided by the number of units to determine the student generation rates (see tables below).

Clovis Unified School District
SINGLE FAMILY RESIDENTIAL STUDENT GENERATION RATES

Grade Level	Students	Dwelling Units	Generation Rate
Elementary (TK-6)	1,907	5,700	.3346
Intermediate (7-8)	464	5,700	.0814
High School (9-12)	781	5,700	.1370
Total (TK-12)	3,152	5,700	.5530

Source: Clovis Unified School District, 2024

Clovis Unified School District
MULTIPLE FAMILY RESIDENTIAL STUDENT GENERATION RATES

Grade Level	Students	Dwelling Units	Generation Rate
Elementary (TK-6)	177	1,469	.1205
Intermediate (7-8)	38	1,469	.0259
High School (9-12)	79	1,469	.0538
Total (TK-12)	294	1,469	.2001

Source: Clovis Unified School District, 2024

APPENDIX 2

SCHOOL BUILDING CAPACITY

	K-6	7-8	9-12	SDC Severe
Form SAB 50-02[1]	14,075	5,238	8,127	225
CART[2]			380	
Century Elementary[3]	575			
Clovis Elementary[3]	878			
Freedom Elementary[4]	700			
Riverview Elementary[4]	700			
Fugman Elementary[5]	700			
Woods Elementary[6]	675			9
Reagan Elementary[7]	700			
Bud Rank Elementary[8]	675			9
Garfield Special Education Classrooms				36
Temperance-Kutner Kindergarten Classrooms	50			
Granite Ridge Intermediate[8]		1,026		
Clovis North High[8]			3,078	
Gateway High School Classrooms			189	
Roger Oraze Elementary[9]	688			
Clovis West Classrooms			307	
Clark Intermediate Classrooms		243		
Sierra Vista Classroom	25			
Virginia Boris Elementary[10]	675			9
Fugman Portable Addition	25			
Reagan Portable Addition	50			
Reyburn Portable Addition		54		
Clovis East High Classrooms			54	
Reagan Elem. Classroom	25			
Fugman Elem. Classroom				9
Oraze Elem. Classrooms	25			9
Janet Young Elementary[11]	675			18
Dry Creek Classrooms[12]	150			
Hirayama Elementary[13]	700			

TOTAL	22,766	6,561	12,135	324

[1]Clovis Unified School District Form SAB 50-02, Existing School Building Capacity, 8/16/00 (includes capacity of Reyburn Intermediate School and Clovis East High School)

[2]Center for Advanced Research and Technology. Opened September 2000.

[3]Opened fall 2000

[4]Opened fall 2002

[5]Opened fall 2004

[6]Opened fall 2005

[7]Opened fall 2006

[8]Opened fall 2007

[9]Opened fall 2011

[10]Opened August 2016

[11]Opened August 2020

[12]Opened August 2022

[13]Opening August 2024

APPENDIX 3

LEVEL 2
SITE ACQUISITION AND SITE DEVELOPMENT COSTS

ALLOWABLE ELEMENTARY SCHOOL SITE ACQUISITION COST

a. Land cost (12.4 acres[1] x $150,333 per acre[2])	$1,864,129
b. 4% allowance for appraisal, escrow, survey, site testing, CDE review/ approval and environmental site assessment or $50,000, whichever is greater	$74,565
c. Total Cost (a + b)	$1,938,694
d. Allowable Cost (c divided by 2)	$969,347
e. Allowable Cost Per Student (d divided by 700)[3]	$1,385

[1]12.4 acres is the land acreage determined to be necessary under the guidelines of the State Department of Education's School Site Analysis and Analysis Handbook as of January 1, 1998. The acreage normally required for the District to accommodate the District's educational program is 18 to 20 acres (gross).

[2]Based upon the average per acre land cost for the Janet Young, Minnewawa-International, and Hirayama school sites.

[3]The typical capacity of a new District elementary school is 700 students.

ALLOWABLE JOINT HIGH SCHOOL/INTERMED. SCHOOL SITE ACQUISITION COST

a. Land cost (69.3 acres[1] x $150,333 per acre[2])	$10,418,077
b. 4% allowance for appraisal, escrow, survey, site testing, CDE review/ approval and environmental site assessment or $50,000, whichever is greater	$416,723
c. Total Cost (a + b)	$10,834,800
d. Allowable Cost (c divided by 2)	$5,417,400
e. Allowable Cost Per Student (d divided by 3600)[3]	$1,505

[1]69.3 acres is the land acreage determined to be necessary for a high school and intermediate school site under the guidelines of the State Department of Education's School Site Analysis and Analysis Handbook as of January 1, 1998. The acreage normally required for a high school and intermediate school to accommodate the District's educational program would be approximately 100 acres (gross).

[2]Based upon the average per acre land cost for the Janet Young, Minnewawa-International, and Hirayama school sites.

[3]The site requirement tables contained in the State Department of Education's School Site Analysis and Analysis Handbook (as of January 1, 1998) are based upon the tables of the 1966 handbook. These tables (which have been updated but cannot be used for Level 2 fee justification) provide for a maximum site size based upon a capacity of 2,400 students for a high school and 1,200 for an intermediate school. Therefore, a total of 3,600 students is used for the capacity of combined high school and intermediate school for the purpose of determining allowable site acquisition cost.

Note: The site acquisition cost per SDC student was calculated using the weighted average of the elementary and secondary school student costs calculated above, based on the percentage of SDC students projected to attend the elementary and secondary grades (59.3.% and 40.7%, respectively). The calculated cost per SDC student is $1,434.

ALLOWABLE ELEMENTARY SCHOOL SITE DEVELOPMENT COST

a. Service Site Cost (Within School Property Lines)[1]	$3,570,107
b. Off-Site Cost[1]	$2,845,744
c. Utility Service Cost[1]	$746,497
d. Total Cost (a+b+c)	$7,162,348
e. Allowable Cost (d divided by 2)	$3,581,174
f. Allowable Cost Per Student (e divided by 750)[2]	$5,116
g. General Site Development Cost Allowance[3]	$1,401
h. Total Allowable Site Development Cost Per Student (f + g)	$6,517

[1]Based on architect estimates of state allowances for Janet Young Elementary School per OPSC Regulations Section 1859.76.

[2]The typical capacity of a new District elementary school is 700 students.

[3]Determined in accordance with OPSC Regulations Section 1859.76(d).

ALLOWABLE JOINT HIGH SCHOOL/INTERMEDIATE SCHOOL SITE DEVELOPMENT COST

a. Service Site Cost (Within School Property Lines)[1]	$18,340,297	
b. Off-Site Cost[1]	$15,203,250	
c. Utility Service Cost[1]	$2,950,112	
d. Total Cost (a+b+c)	$36,493,659	
e. Allowable Cost (d divided by 2)	$18,246,829	
f. Allowable Cost Per Student (e divided by 4,104)[2]	$4,446	
	Grades 7-8	Grades 9-12
g. General Site Development Cost Allowance[3]	$1,435	$1,229
h. Total Allowable Site Development Cost Per Student (f + g)	$5,881	$5,676

[1]Based on state allowances for Clovis North High School and Granite Ridge Intermediate School per OPSC Regulations Section 1859.76, increased in accordance with the Construction Cost Index as adopted by the State Allocation Board.

[2]Based upon the loading standards specified in the Leroy F. Greene School Facilities Act of 1998, the typical capacity of a high school and intermediate school constructed on a joint site would be 4,104.

[3]Determined in accordance with OPSC Regulations Section 1859.76(d).

Note: The site development cost per SDC student was calculated using the weighted average of the costs for grades K-6, 7-8 and 9-12 shown above. The calculated cost per SDC student is $6,196.

APPENDIX 4

LEVEL 1
SCHOOL FACILITIES COST ESTIMATES

ELEMENTARY SCHOOL COST

a. Building and Site Development	$53,245,860
b. Architect, DSA and CDE fees; printing & advertising	$3,000,000
c. Testing, inspection, furniture, equipment, insurance and contingency	$7,000,000
d. Total Cost (a+b+c)	$63,245,860
e. Cost Per Student (d divided by 700)[1]	$90,351

Source: Clovis Unified School District estimated costs for Hirayama Elementary School.

[1]Based upon the loading standards specified in the Leroy F. Greene School Facilities Act of 1998, the typical capacity of a new District elementary school is 700 students.

JOINT HIGH SCHOOL/INTERMEDIATE SCHOOL COST

a. Building and Site Development	$458,635,554
b. Architect, DSA and CDE fees; printing & advertising	$27,699,492
c. Testing, inspection, furniture, equipment and contingency	$65,623,641
d. Total Cost (a+b+c)	$551,958,687
e. Cost Per Student (d divided by 4104)[1]	$134,492

Source: Clovis Unified School District estimated costs for Terry P. Bradley Educational Center (7-12).

[1]Based upon the loading standards specified in the Leroy F. Greene School Facilities Act of 1998, the typical capacity of a high school and intermediate school constructed on a joint site would be 4,104.

Note: The building construction cost per SDC student was calculated using estimated construction costs for Hirayama Elementary with costs proportionally allocated based on the SDC capacity for the site ($169,434 per student).

ELEMENTARY SCHOOL SITE ACQUISITION COST

a. Land cost (19 acres[1] x $150,333 per acre[2])	$2,856,327
b. 4% allowance for appraisal, escrow, survey, site testing, CDE review/ approval and environmental site assessment or $50,000, whichever is greater	$114,253
c. Total Cost (a + b)	$2,970,580
d. Cost Per Student (c divided by 700)[3]	$4,244

[1] The acreage normally required for the District to accommodate the District's educational program is 18 to 20 acres (gross). For this estimate, an average figure of 19 acres is used.

[2]Based upon the average per acre land cost for the Janet Young, Minnewawa-International and Hirayama school sites.

[3]Based upon the loading standards specified in the Leroy F. Greene School Facilities Act of 1998, the typical capacity of a new District elementary school is 700 students.

JOINT HIGH SCHOOL/INTERMEDIATE SCHOOL SITE ACQUISITION COST

a. Land cost (100 acres[1] x $150,333 per acre[2])	$15,033,300
b. 4% allowance for appraisal, escrow, survey, site testing, CDE review/ approval and environmental site assessment or $50,000, whichever is greater	$601,332
c. Total Cost (a + b)	$15,634,632
d. Cost Per Student (c divided by 4,104)[3]	$3,810

[1]The acreage normally required for a high school and intermediate school to accommodate the District's educational program is approximately 100 acres (gross).

[2]Based upon the average per acre land cost for the Janet Young, Minnewawa-International and Hirayama school sites.

[3]Based upon the loading standards specified in the Leroy F. Greene School Facilities Act of 1998, the typical capacity of a high school and intermediate school constructed on a joint site would be 4,104.

Note: The site acquisition cost per SDC student was calculated using the weighted average of the elementary and secondary school student costs calculated above, based on the percentage of SDC students projected to attend the elementary and secondary grades (56.5. % and 43.5%, respectively). The calculated cost per SDC student is $4,055.

APPENDIX 5

COMMERCIAL/INDUSTRIAL DEVELOPMENT PROJECTION

The square footage of commercial/industrial development permitted in the District between January 1, 2014, and December 31, 2023, is shown in the table below.

Clovis Unified School District
COMMERCIAL/INDUSTRIAL SQUARE FOOTAGE PERMITTED 2014-2023

Year	Commercial/Industrial Building Square Footage
2014	483,375
2015	333,901
2016	382,512
2017	504,882
2018	491,785
2019	745,848
2020	191,535
2021	359,518
2022	267,839
2023	356,210
5 Year Total	1,920,950
5 Year Average	384,190
10 Year Total	4,117,405
10 Year Average	411,741

Source: Clovis Unified School District Developer Fee Certificates; ParcelQuest

The above table indicates that 4,117,405 square feet of commercial/industrial development has been permitted in the District during the past ten years, ranging from a high of 745,848 square feet in 2019 to a low of 191,535 square feet in 2020. The annual average for the past ten years was 411,741 square feet. The total square footage for the past five years was 1,920,950 square feet, with an annual average of 384,190 square feet.

The District has a substantial amount of land available for future commercial and industrial development. Based on the past activity and future potential, it is reasonable to expect that commercial/industrial development will at least continue at the five-year average of 384,190 square feet per year, which would result in a total of approximately 1.92 million square feet of commercial/industrial development being permitted in the District during the next five years.

APPENDIX 6

SOURCES CONSULTED

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