LEGISLATIVE REPORT

SUBJECT: School Impact Fees

REFERENCE: Act 245, SLH 2007 (HB 19, HD2, SD2, CD1)

ACTION REQUESTED: Requires the DOE to implement a law establishing school impact fees to be paid by the developers of new housing. The fees offset the impact of the new housing on public school facilities.

DOE REPORT:

Introduction: The Legislature in 2007 passed Act 245 requiring the Department of Education (DOE) to charge housing developers an impact fee comprised of land and/or money. The fees would be used for new or enlarged public school facilities. The bill included a formula for calculating land and money amounts.

Act 245 requires the identification of districts where the impact fees will be imposed and an impact fee analysis for each of the proposed districts.

No funding was provided for the required analysis.

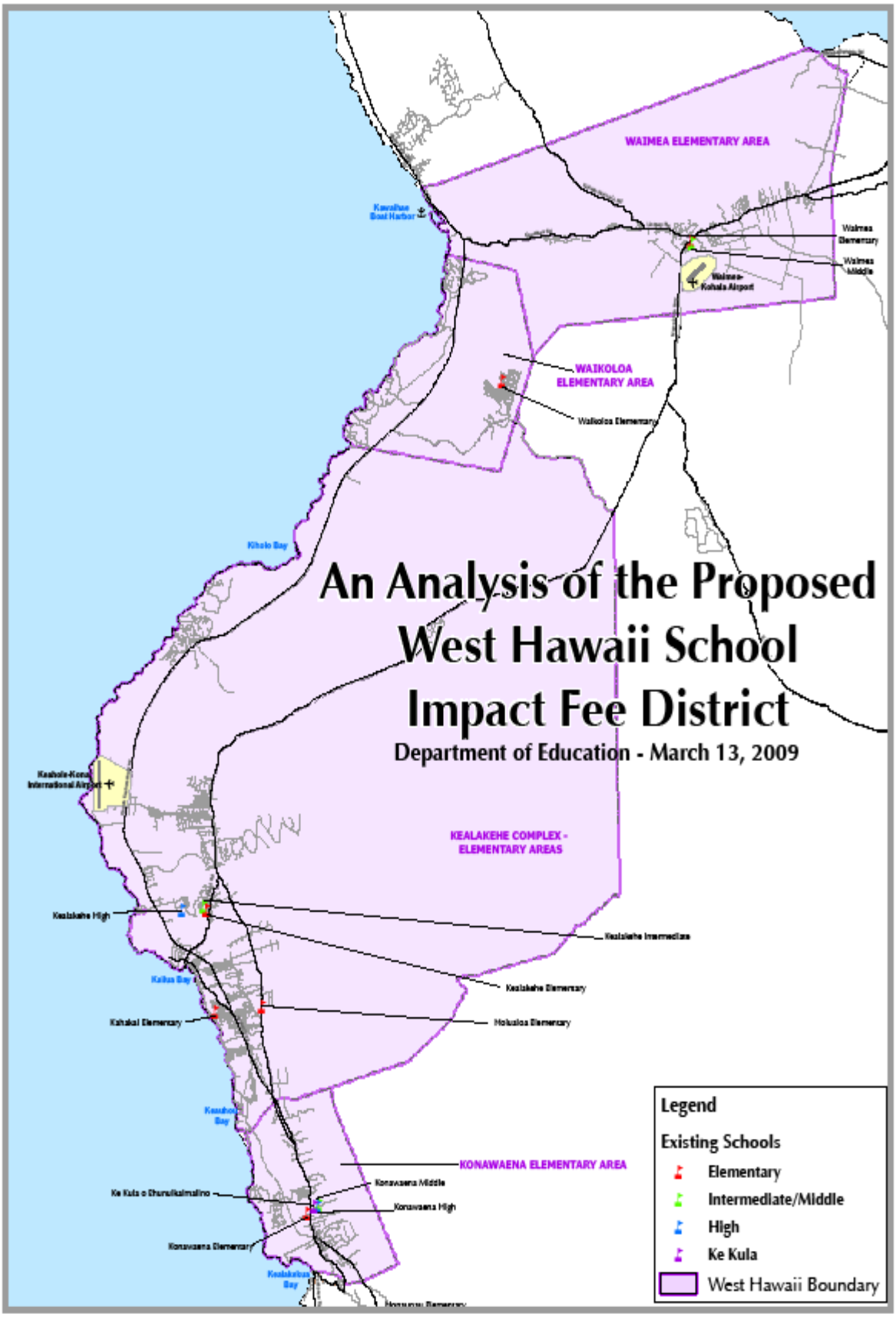
Status Report on Act 245.

The DOE completed the impact fee analysis for West Hawaii (attached). The analysis indicated that the magnitude of residential development planned in West Hawaii would generate significantly more students than the present schools can accommodate.

The Board of Education (BOE) is considering adoption of the first district before the end of 2009. There are approximately five (5) to seven (7) possible additional districts. Each district requires identification, analysis, a public hearing and BOE approval.

FINDINGS: DOE has completed analysis of the first district and has begun the analysis of the second one.

RECOMMENDATIONS: None.


WAIMEA ELEMENTARY AREA
Kawaihae Boat Harbor
Waimea Elementary
Waimea Middle
Waimea-Kohala Airport
WAIKOLOA ELEMENTARY AREA
Waikoloa Elementary
Kiholo Bay
An Analysis of the Proposed West Hawaii School Impact Fee District
Department of Education - March 13, 2009
Keahole-Kona International Airport
KEALAKEHE COMPLEX - ELEMENTARY AREAS
Kealakehe High
Kealakehe Intermediate
Kealakehe Elementary
Kaloa Bay
Kahakai Elementary
Holualoa Elementary
Kaudom Bay
KONAWAENA ELEMENTARY AREA
Konawaena Middle
Ke Kula o Ehunuikaimalino
Konawaena High
Konawaena Elementary
Kealakekua Bay
Legend
Existing Schools
Elementary
Intermediate/Middle
High
Ke Kula
West Hawaii Boundary

This report was prepared in accordance with
Act 245, Session Laws of Hawaii 2007

Group 70 International, Inc.

The Board Of Education will consider public comments before the proposed District comes up for approval in May or June, 2009. Public comments can be submitted at the public hearing on April 13, 2009 at Kealakehe High School library, or emailed to heidi_meeker@notes.k12.hi.us .

A map and this report regarding the proposed West Hawaii impact district are available at http://doe.k12.hi.us . Copies are also available at the West Hawaii Complex Area Office (75-140 Hualalai Road, adjacent to the Kailua-Kona Public Library) or by calling the DOE Facilities Development Branch at 808-377-8301.

THE PROPOSED WEST HAWAII IMPACT FEE DISTRICT

I. Introduction and Background

In recent decades the requirement to provide land and money for schools was imposed by state and county agencies as a condition of urbanizing land. The Department of Education (hereinafter "DOE") collected payments of school land and cash from some developers when their projects were required to make "fair-share contributions" by the State Land Use Commission or the counties to gain project approval. The DOE was only granted its own authority to collect impact fees two years ago by Act 245, Session Laws of Hawaii 2007.

Prior to Act 245, the State Legislature in 2005 established a School Impact Fee Working Group (hereinafter "Working Group"). The Working Group submitted its findings and recommendations in a report, *Hawaii School Impact Fee Working Group Report* (hereinafter "2007 Report"), prepared by Duncan Associates and Group 70 International, Inc., in March 2007. The report analyzed salient issues, including "Fair Share" practices; conducted two case studies for specific areas in Central Oahu; and offered impact fee legislative language. The 2007 report also provided a framework, or procedure, for determining fee schedules for those areas of the state experiencing enough new residential development to create the need for new or expanded school facilities.

The New Law

Act 245 incorporated many of the findings and recommendations in the 2007 Report. It allows DOE to charge impact fees within school impact districts where new public schools must be constructed or expanded to accommodate the children from new homes.

The 2007 Report determined that from 1997 to 2007, the state paid approximately $17,102 in school construction to house the additional students generated by one new unit of single-family housing. For every 100 units of new single-family homes, the state was providing .856 acres of school land.

The law requires developers to provide much of the land needed for new schools. In addition, developers are also required to contribute either ten percent (10%) of all new school construction costs, or ten percent (10%) of the construction costs of expanding an existing school. The balance of school construction funds would continue to come from state tax revenues.

The Legislature determined that new residential developments within identified school impact districts create additional demand for public school facilities. Therefore, developers of new housing are required to pay a portion of the cost of providing new or enlarged public schools to serve the additional students who will be living in the new housing. The land or fees charged are based on each new development's proportionate share of the additional demand on public school facilities.

The law requires that the DOE identify impact districts where the fees could be charged. It also requires that an analysis be conducted on each of the proposed districts to verify the need for new school facilities and to determine the amount of fees charged. The written analysis must contain a map showing the boundaries of the impact district, and analysis to support the

need to construct new or expand existing school facilities within the next 25 years to accommodate projected growth in the area.

What follows is the required analysis, based on recent history and DOE's best predictions for the future. Analyzing the future is not an easy task, especially in light of unprecedented uncertainty about the economy and home building in particular.

Summary of Findings

The DOE selected West Hawaii as the location of its first school impact fee district based on the high growth experienced over the past 20 to 30 years (Table 1), as well as on the high growth expected over the next 20 to 30 years (Table 2).

There are over 28,000 new residential units projected in the next 25-30 years in the West Hawaii Impact Fee District (hereinafter "District"). These new units will generate over 17,000 additional public school students who will attend area public schools. Please refer to Appendix A for list of proposed projects by school complex and their projected new units.

Over 17,000 new public school students over the next thirty years (Table 6) would require a large number of new schools, with a total acreage of between 400 to 500 acres. The new law would result in developers providing approximately 300 of those school acres if, and when, every proposed project is completed (Table 10).

The total amount of impact fees generated from 28,000 residential units would be approximately $79 million (Table 10). It is difficult to project the total construction cost of a large number of new or expanded schools over the next thirty years. However, for some perspective, it cost the DOE approximately $90 million to construct two elementary schools in 2006.

The DOE's analysis of population and enrollment growth in the proposed District concludes that there was tremendous growth during the 1980's and part of the 1990's (Table 3). The number of schools serving the District during that period grew from 6 to 13. That growth slowed down in the current decade, with the number of schools increasing to 17.

At some point 25 to 30 years in the future, upon the completion of most of the new residential construction proposed with in the School Impact District, and when the combined population of North Kona and South Kohala comes close to the estimated 78,000 range, the DOE will be responsible for providing a very large number of new or expanded schools.

The Legislature gave the DOE the authority and responsibility to collect impact fees from established impact fee districts. Within an approved district, the DOE should be able to plan for, and count on, securing sites for new schools and some construction funding. The impact fees would come from the growth areas that will fill the new schools. Those schools in turn become part of the foundation for new communities.

II. The West Hawaii Impact Fee District

The 2007 Report made a recommendation that the State of Hawaii implement school impact fees in areas that: 1) are experiencing overall enrollment growth; 2) are expected to experience enough residential development within the next ten years to require additional school facilities and 3) have limited additional student capacity in their existing school facilities.

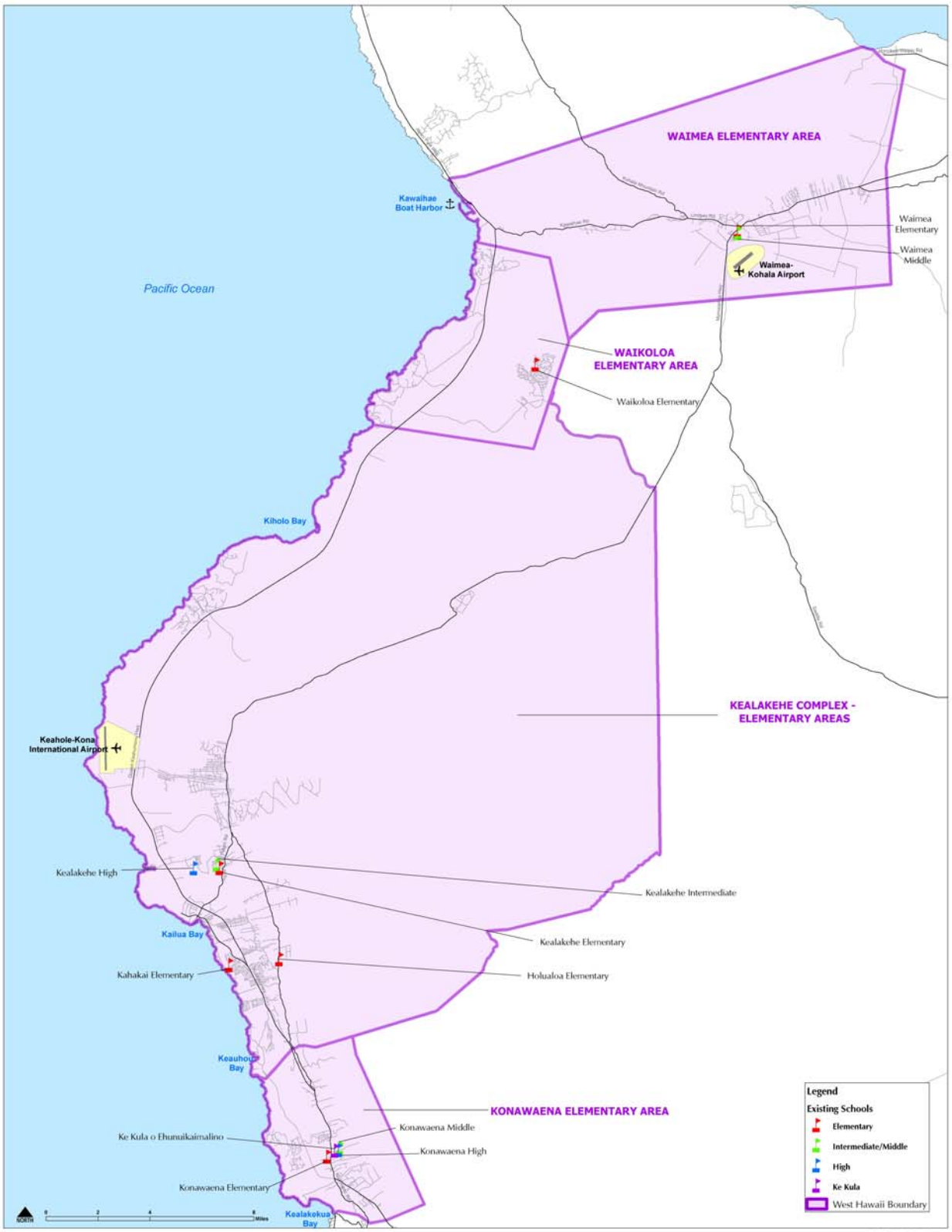
Act 245 defines "school impact district" as a geographic area designated by the Board of Education where growth in the next 25 years will create the need for one or more new schools or the expansion of one or more existing schools. These schools are or will be located within the area and will primarily serve new housing units within the area. The analysis must demonstrate that growth and development are occurring and creating the need for new or expanded school facilities.

Most of the new development projects have represented themselves as being future communities for Kona residents, people with jobs and families, not vacationers or part-time residents. Many of the proposed projects are located in the North Kona areas, between Keahole and Kealakehe and between the Queen Kaahumanu and Mamalahoa Highways, where there are currently no schools.

The analysis focuses on the direct impact of new development on area schools. The boundaries the DOE selected for the proposed School Impact Fee District rely on the existing school service boundaries of six contiguous elementary schools—Waimea, Waikoloa, Kealakehe, Holualoa, Kahakai and Konawaena. It was most logical to use existing school boundaries, with school specific data, rather than create new boundaries, or relying on non school-related boundaries, especially since these smaller boundaries capture the future growth areas more precisely.

Using just the elementary school boundaries means there will still be enrollment growth in the middle and high schools linked to the six elementary schools. But those middle and high schools often serve more than just the high growth impact district. For example, Konawaena Middle and Konawaena High serve some parts of growing North Kona as well as slower growing South Kona.

The Proposed West Hawaii School Impact Fee District



Proposed West Hawaii School Impact Fee District

GROUP 70 INTERNATIONAL

Date:10/13/2008

Description of the Impact District

South Kohala
Due to the growth in tourism within the district, the population of South Kohala increased dramatically over the past 30 years.

Although tourism is currently the leading economic industry in the district, the area is also well known for cattle ranching, vegetable production, egg production and other forms of agriculture.

Future large-scale planned development in this area includes over 3,200 homes at Aina Lea, Waikoloa and over 2,500 homes at Waikoloa Heights.

North Kona
Spurred primarily by the employment opportunities created by the expanding visitor industry, population has greatly increased in the North Kona area over the last 30 years.

Most of the Big Island's coffee production is in the North and South Kona Districts. Other agricultural enterprises include cattle ranching and the growing of fruits, macadamia nuts and vegetables.

The North Kona district was once the major visitor destination on the island. However, this distinction is now shared with the South Kohala district due to the development of numerous hotel complexes along the South Kohala coast.

Large-scale planned developments in this area include Kaloko Makai and Kaloko Heights, with over 6,500 residential units; Palamanui with over 1,100 residential units; and Keahuolu with over 2,200 homes planned.

Population Trends and Projections

TABLE 1
Recent Population Trends

Judicial District	**1980**	**1990**	**2000**	**1980-90 % change**	**1990-00 % change**
North Kona	13,748	22,284	28,543	62.1	28.1
South Kohala	4,607	9,140	13,131	98.4	43.7
TOTAL	**18,355**	**31,424**	**41,674**	**71.2**	**32.6**

Source: Hawaii County General Plan (February 2005)

Table 1, above, illustrates the population growth in the North Kona and South Kohala judicial districts. It is clear that the larger population increase in both districts occurred in the 1980's, but there was still significant growth in the 1990's. Almost as dramatic as the population growth over the last thirty years is the projected population increase through the year 2035, as shown in Table 2 below. The 2010 population is expected to increase about 25% from 2000 levels. Another almost 50% increase is projected from 2010 to 2035.

TABLE 2
Population Projection for West Hawaii

Judicial District	2000	2010 projection	2035 projection	2000-2010 % change	2010-2035 % change
North Kona and South Kohala	41,674	52,208[1]	78,176[2]	25.3	49.7

A Description of the School Population

Population growth in North Kona and South Kohala in the 20 years between 1980 and 2000 was reflected in growing school enrollments in those schools located in the proposed impact district and in the schools serving the impact district. The growth is illustrated in the next chart, Table 3.

[1] *Hawaii County General Plan*, February 2005

[2] *DBEDT Population and Economic Projections for the State of Hawaii to 2035.* All of Hawaii County is projected to be 185,800 in 2010 and 279,200 in 2035. In a 2010 population projection based on census tracts, the North Kona Coast is projected to be 52,208 in 2010. The 2010 figure of 52,208 is 28% of the County total for 2010. Therefore, 78,186 for 2035 is also 28% of the projected 2035 County total of 279,200.

TABLE 3
Historic & Projected Enrollment in Impact District Schools
1980-2013

	1980	1990	2000	2008	Projected Enroll. 2013	Net Gain/ Loss '80 to '90	Net Gain/ Loss '90 to 2000	Net Gain/ Loss 2000 to 2008	Total Net Gain/ Loss '80 to 2008	Projected Net Gain/ Loss 2008 to 2013
Schools whose service areas make up the Impact District										
Waimea El	683	1206	1154	595	639	523	-52	-559	-88	44
Waikoloa El			564	702	866	0	564	138	702	164
Holualoa El	223	373	425	477	429	150	52	52	254	-48
Kahakai El		663	680	607	601	663	17	-73	607	-6
Kealakehe El	1344	940	970	943	1018	-404	30	-27	-401	75
Konawaena El	597	660	788	572	570	63	128	-216	-25	-2
subtotal	2847	3842	4581	3896	4123	995	739	-685	**1049**	227
Schools that serve students living in the Impact District										
Waimea Mid-Conversion				357	523	0	0	357	357	166
Honokaa Hi & Mid	601	773	794	790	845	172	21	-4	189	55
Kealakehe Mid		754	933	904	933	754	179	-29	904	29
Konawaena Mid			235	426	459	0	235	191	426	33
Kealakehe High			1475	1650	1465	0	1475	175	1650	-185
Konawaena High	1251	1616	868	731	675	365	-748	-137	-520	-56
Ke Kula O Ehunuikaimalino K-12				188	203	0	0	188	188	15
subtotal	1852	3141	4305	5046	5103	1291	1162	741	**3194**	57
Charter Schools that serve students in the Impact District										
Kanu O Ka`aina K-12			127	199	250		127	72	199	51
Innovations 1-7				168	250		0	168	168	82
West HI Exploration Academy 7-12			121	166	250		121	45	166	84
Kona Pacific K-4				91	232		0	91	91	141
Subtotal			248	624	982		248	376	**624**	358
TOTALS	4699	6985	9134	9566	10208	2286	2149	432	**4867**	642

Enrollment in impact district schools and district-serving schools almost doubled from 4,699 to 9,134 students in the 20 years from 1980 to 2000. During that period the number of schools increased from 6 regular schools to 11 regular and 2 charter schools. In reviewing the table it should be noted that large declines in one individual school are generally explained by the opening of new schools.

In the last 8 years, 2000 to 2008, the rate of enrollment growth slowed down, with the exception of charter schools which increased from 2 to 4 schools. The total current enrollment of the schools in or serving the impact district is 9,566, an increase of 103.5% over the last 28 years.

The total projected enrollment for these schools in the next five years, to the 2013-2014 school year, is expected to exceed 10,000 students. A significant portion of the projected growth is expected to come from the charter schools.

Projected Growth in the Impact District

In the West Hawaii Impact District, through 2035, over 28,000 new residential units are expected to create about 17,000 new public school students. Appendix A provides a rough list of proposed projects sorted by the area's present school complex. Table 4, below, is a summary of that list.

TABLE 4
New Units Projected in the District Through 2035

Complex	Single-family	Multi-family	Total units
Konawaena	1,118	885	2,003
Kealakehe	9,757	6,470	16,227
Honoka`a	7,208	2,744	9,952
TOTAL	18,083	10,099	**28,182**

Source: Research by DOE, 2007-2035

Student Generation Rates

Table 5, below, illustrates the number of students expected to reside in the future units. The student count is calculated by multiplying the unit counts by a set of student generation rates (SGR).

TABLE 5
New Students Generated from New Projected Units Through 2035

Complex	Single-family	Multi-family	Total students
Konawaena	805	354	1,159
Kealakehe	7,025	2,588	9,613
Honoka`a	5,190	1,098	6,288
TOTAL	13,020	4,040	**17,060**

The SGR is the average number of students that will reside in each unit after a project has reached maturity, when it achieves a stable population. SGRs are determined by analysts in the DOE Information Resource Management Branch.

An analysis of school impacts within a proposed impact district requires a district-wide student generation rate. Appendix B provides an explanation of how the West Hawaii District SGRs were calculated. Table 6 illustrates how the District SGRs are applied to future unit counts to produce an estimated number of additional students.

TABLE 6
New Students Generated by New Development in the West Hawaii Impact District through 2035

	Single family SGR[3]	Students in Single-family units	Multi-Family SGR	Students in Multi-family units	TOTAL
Total # units		18,083		10,099	28,182
Elementary	0.32	5,787	0.20	2,020	7,807
Middle	0.18	3,255	0.10	1,010	4,265
High	0.22	3,978	0.10	1,010	4,988
Total students		**13,020**		**4,040**	**17,060**

III. HOW THE IMPACT FEE FORMULA WORKS

The required impact fee consists of a land requirement, either through land dedicated by the developer or a fee in lieu, and a construction cost through a fee based on the development's proportionate share[4] of the need to build additional public school facilities.

Land component

The amount of land dedication is based on the following three variables:
1) Projected number of new students generated;
2) The number of dwelling units in the development; and
3) The average acres per student provided in schools built in the past 10 years.

The projected number of new students is determined by multiplying the District's SGRs by the amount of single-family and multi-family units. That number is then multiplied by the average acres per student to arrive at the total school land requirement for a particular development.

Act 245 supplied the average acres per student for elementary (K-5), middle (6-8) and high (9-12) schools. Based on all DOE schools built between 1987 and 2007, the historical average design standards during this time period are laid out in Table 7.

[3] Student Generation Rate discussion can be found in Appendix B.

[4] In determining proportionate share, new developments shall be charged for a level of service that is equal to, and no higher than, the current level of service that is being provided to existing residential areas.

TABLE 7
Average Acres per Student Based On Recent School Construction

New Schools built 1997-2007	Total Acreage of all schools	Total Designed Enrollment of all Schools	Acres/Student
7 Elementary Schools	**87.05**	**5,591**	**0.0156**
3 Middle Schools	**49.76**	**4,527**	**0.0110**
3 High Schools	**144.34**	**4,711**	**0.0306**

Source: Hawai`i School Impact Fee Working Group Report, March 2007

TABLE 8
Calculating the Land Cost Component of the School Impact Fees

School type	(1) West Hawaii SGR	(2)Number of Units/ Project	(3)Avg. acres/student provided '97-'07	Land fee in acres for 1 SF unit	Land fee in acres for 100 SF units
Elem	0.32	1	0.0156	0.005	0.4992
Middle	0.18	1	0.0110	0.002	0.198
High	0.22	1	0.0306	0.007	0.6732
Acreage for West Hawaii SF Units				**0.014**	**1.3704**
				1 Multi-family unit	100 Multi-family Units
Elem	0.20	1	0.0156	0.003	0.312
Middle	0.10	1	0.0110	0.001	0.11
High	0.10	1	0.0306	0.003	0.306
Acreage for West Hawaii Multi-family Units				**0.007**	**0.728**

School Land Formula

To calculate the land dedication requirement for an individual project, the acres per student required for elementary, middle and high school is each multiplied by the total number of single-family and multi-family units in the project. The results are then all added together for the total acreage required from the project.

According to the land formula above, (Table 8) in the West Hawaii Impact District, the school land required to accommodate new students is 1.37 acres for every 100 single family homes and .73 acres for every 100 multi-family homes.

Fee-in-Lieu of Land

If the DOE determines it does not need land, it will notify a developer of a need for a fee-in-lieu of land.

The dollar amount of the fee-in-lieu of land is determined using the following formula: the total school land requirement multiplied by the value per acre of land in the project. The value is based on the appraised fair market value of improved, vacant land, zoned for residential use with the necessary infrastructure.

School construction cost component

In addition to the land dedication requirement, developers must also provide 10% of all new school construction costs.

The construction cost impact fee is based on the following five variables:

1) Student generation rates;
2) Recent public school construction costs per student;
3) The statewide percentages of students in permanent school facilities;
4) The construction cost factors for the twenty-six geographically limited cost districts; and
5) The number of single-family and multi-family dwelling units in the development.

Impact fees cannot be used to provide a higher level of service than is already being provided. Impact fees must be based on a level of service standard that "shall apply equally to existing and new public facilities."[5] Act 245 defines "Level of service" as the percentage of classrooms that are in permanent structures, as opposed to portable buildings.

A discussion of the percent of West Hawaii students in permanent school facilities follows under the heading "Current Local Levels of Service."

TABLE 9
Calculating the Construction Cost Component of the School Impact Fees

Type of School	(1) West Hawaii SGR	(2) Recent School Construction Costs/student	(3) Discounted by the per cent of students in permanent structures	(4) Construction Cost Differential for S. Kohala and Kona	(5) Number of Units/ Project	Construction Fee per 1 unit of housing	10% of cost
Elem	0.32	$35,357	0.854	1.2	1	11,595	$1,159
Mid	0.18	$36,097	0.907	1.2	1	7,072	$707
High	0.22	$64,780	0.873	1.2	1	14,930	$1,493
Fee for West Hawaii SF Units							**$3,360**
Elem	0.20	$35,357	0.854	1.2	1	7,247	$725
Mid	0.10	$36,097	0.907	1.2	1	3,929	$393
High	0.10	$64,780	0.873	1.2	1	6,786	$679
Fee for West Hawaii Multi-Family Units							**$1,796**

The Formula *(for either single family or multi-family units):*

Elementary SGR per unit (x) elementary school cost per student (x) percentage of existing elementary students in permanent buildings (x) construction cost district factor;
plus (+)
Middle or intermediate school student generation rate per unit (x) middle or intermediate school cost per student (x) statewide percentage of existing middle school students in permanent buildings (x) cost district factor;
plus (+)
High school student generation rate per unit (x) high school cost per student (x) statewide percentage of existing high school students in permanent buildings (x) cost district factor;

[5] *Hawai`i School Impact Fee Working Group Report*, Duncan and Associates and Group 70 International, Inc., March 2007, page 44.

equals (=)
School construction cost per unit.

The construction cost per unit, for elementary, middle and high schools and for single-family and multi-family units is then multiplied by the number of single-family and multi-family units, respectively.

According to the formula above the school construction costs in the South Kohala and Kona Districts to offset the impact of increased enrollment is $33,594 for single-family dwellings and $17,961 for multi-family dwellings.

Act 245 states that the construction cost component impact fee shall be ten percent of the school construction cost attributable to each new residential development in the impact fee district. In the West Hawaii Impact District, the construction cost impact fee is then $3,359 per single family dwelling and $1,796 per multi-family dwelling. A fee schedule is located in Appendix D.

An Estimated Total of Impact Fees for the District

Based on the foregoing analysis, over the next 25 to 30 years in the West Hawaii impact fee district, over 28,000 additional residential units and over 17,000 new public school students will require that developers contribute a total of 322 acres and almost $79 million in construction impact fees. See Table 10, below.

TABLE 10
Estimate of Total Impact Fees for West Hawaii School Impact District, Based on Projected Number of New Units

# of units	Type of unit	Land Requirement	Construction Requirement		
		in Acres	per unit		total
18,083	single family	248	$3,359		$60,740,797
10,099	multi-family	74	$1,796		$18,137,804
		322			$78,878,601

A New Board of Education Policy

In June 2008, the Board of Education revised an existing policy relating to design enrollment guidelines for new schools. Table 9 above sets the historic average acreage per student provided from 1997 to 2007. That is the basis for calculating the land component of the impact fee. The revised BOE policy for future schools reflects a range of school sizes, including campus acreage and number of students. The average acreage per student for actual future schools (Table 11) will be larger than the historic average acreage used to calculate the fee amount.

TABLE 11
New BOE Policy on Design Enrollment Guidelines

	Usable[6] Acres/school	Enrollment/school	Acres/student
Elementary	8-15	400-750	.02
Middle	15-20	500-1,000	.02-.03
High	45-55	800-1,600	.0343-.0562

The new BOE policy for school size could mean that upon the completion of most of the build out of the District, the number of new schools could range from 18 to 34, with a total land requirement of 413 to 565 acres. The balance of the land would have to be purchased with state revenues. The additional land could also be provided by the developers and credited against their construction fee requirement.

TABLE 12
Estimate of Total Number of New Schools Needed for West Hawaii School Impact District, Based on Projected Number of New Units

Type of school	Estimate # of additional students	# of schools based on minimum enrollment size	Minimum total acreage for all new schools	# of schools based on maximum enrollment size	Maximum total acreage for all new schools
Elementary	7,807	20	156	10*	156
Middle	4,265	9	128	4**	85
High	4,988	6	281	3	171
TOTAL	17,060	34	565	18	413
*Elementary school sites already identified: Waikoloa, Keahuolu					
** Middle school sites identified: Waikoloa					

IV. Legal Tests and Required Considerations

Rational Nexus and Rough Proportionality

The amount of new schools and potential impact fees must meet the "rational nexus" and "rough proportionality" test established by court decisions.

"Rational nexus" was defined in the *Nollan v. California Coastal Commission,* 483 U.S. 825 (1987), case as the reasonable connection that must exist between new development and the new or expanded facilities required to accommodate that development. "Rough proportionality" was defined in the *Dolan v. City of Tigard,* 512 U.S. 374 (1994), case as an expansion of the rational nexus test, adding that there must be a "rough proportionality" between the impact of the new development and burden of the exaction imposed on it.

[6] *DOE Policy #6701;* Usable is generally defined as land free of encumbrances determined to be unnecessary by the department of education, slope of five percent or less, with no ravines or stream beds. The DOE will make the final determination as to whether land is usable based on an evaluation of the specific property taken in the context of the development as a whole.

In this analysis, the required additional public school facilities are a direct result of the anticipated development's additional residential units and their additional public school students. The District anticipates over 28,000 new residential units (Appendix A), which will generate over 17,000 additional new public school students. To accommodate the increase in enrollment, a large number of new public schools will be required.

Both the land and construction cost requirement of the impact fee are roughly proportional to the amount of anticipated new development. The acreage requirements for new school facilities are based on actual historic school construction averages, not an arbitrary amount. The cost of the land, when used to determine the fee in-lieu, is the fee simple value based on the apprised fair market value of improved, vacant land, zoned for residential use with the necessary infrastructure.

In addition, each development pays the same amount per unit and the fees can only be used to build school facilities serving the students in the impact district.

Current Local Level of Service

The following table provides information on existing and projected conditions in the regular schools (i.e., excluding charter schools) located within the West Hawaii District, or located outside the District but serving students living in the District.

Table 13
Schools Serving the West Hawaii Impact District

School	Type	Facility Cap. '07-'08	Enroll '07-'08	% of Existing Capacity	# Permanent classrooms	# of Portables	% of Portables to All Classrooms
Honokaa	High	1149	837	73	48	11	18.6%
Waikoloa	Elem	685	702	102	35	0	0.0%
Waimea	Elem	697	595	85	35	5	12.5%
Waimea	Mid	374	357	95	16	25	61.0%
Holualoa	Elem	430	477	111	9	16	64.0%
Kahakai	Elem	781	607	78	35	7	16.7%
Kealakehe	Elem	981	943	96	33	20	37.7%
Kealakehe	Mid	1,037	904	87	49	9	15.5%
Kealakehe	High	1,455	1,650	113	72	3	4.0%
Konawaena	Elem	641	572	89	33	0	0.0%
Konawaena	Mid	728	426	59	30	5	14.3%
Konawaena	High	1,146	731	64	54	16	22.9%
Ke Kula	K-12	216	173	80	1	9	90.0%

Source: DOE updated data

As the table above shows, most facilities in the West Hawaii impact district are close to, or over, total capacity based on current enrollment and current facility capacity. Capacity in the district ranges from 59% at Konawaena Middle, to 113% of capacity at Kealakehe High School. Waikoloa and Holualoa Elementary Schools also exceed existing capacity.

Underutilized School Facilities

Act 245, §302 A-E (6), requires an analysis of proposed redistricting, listing the advantages and disadvantages by making more efficient use of existing underutilized assets.

Generally the schools with the largest amount of excess facility capacity are located outside the impact fee boundaries, but they serve some of the students living in the impact district. Schools like Honokaa High and Intermediate and Konawaena High could only accommodate students from new growth areas by transporting them extremely long distances through considerable traffic congestion. Long daily school commutes have been extremely unpopular with parents and students. The school bus pick-up and drop-off times shown below preclude students from participating in extracurricular activities such as sports and music, and students can spend almost an hour and a half, or even more, commuting.

Table 14
Some Commute Times to Schools Serving the District

Route	Miles	Time	Pick-up	Drop-off
Waikoloa to Waimea Middle	18.95	40 minutes	6:45am	3:35pm
Waikoloa to Kealakehe High	31.12	42 minutes	7:25am	4:45pm
Keauhou to Konawaena Mid. and High	6.73	17 minutes	7:10am	3:15pm

The impact district areas with the greatest amount of proposed new housing are presently undeveloped with no existing schools. These are the residential projects south of Waikoloa and north of Kealakehe. Their nearest schools are the schools in Kealakehe. Of those schools, only Kealakehe Intermediate has some excess capacity now with projected excess capacity of 104 students in 2013-2014. In 25 to 30 years, with the addition of 16,227 new units, we expect 2,400 new intermediate students in the Kealakehe vicinity. Existing schools cannot accommodate such a large influx of students.

There is excess capacity in Konawaena Middle and Konawaena High, but again not sufficient to accommodate the number of additional students expected in the Kealakehe area over the next 25 to 30 years.

Waimea Middle has excess capacity and did serve the middle school population of Waikoloa, but the long distance commute proved so unpopular that Waikoloa Elementary has expanded to include the 6^{th} and 7^{th} grades. Middle school students can now chose to go to either Waikoloa Elementary or Waimea Middle. Eventually, a middle school will be built in Waikoloa on a site already dedicated for that purpose.

The DOE is currently reviewing statewide school consolidation and is considering school consolidation in Hawaii County, including Honaunau and Hookena Elementary Schools, as well as some schools in the Kohala area. None of the contemplated consolidations would affect schools serving the West Hawaii District.

Redistricting Policies

It is highly likely that there will be some redistricting of schools in the District over the next 25 to 30 years. If enrollment grows at the rates anticipated and if all proposed projects are built, there would be a need to review school attendance boundaries to accommodate new schools. There could also be a need to relieve overcrowded schools.

Because of the large population expected north of the Kealakehe area, redistricting by itself would not eliminate the need for new schools. Those schools with significant excess facility capacity today are located beyond the boundaries of the District and far removed from the center of projected growth.

Design Enrollment Standards

Act 245, §302 A-E (7), requires an analysis of appropriate school land area and enrollment capacity, which may include non-traditional (i.e. mid-rise or high-rise structures) facilities to accommodate the need for public school facilities in high growth areas within existing urban developments.

There are advantages of both single-story and multi-story school construction. Single-story construction eliminates the cost of stairwells and elevators, is more residential in character, and makes it easier to utilize natural light. Single-story construction also provides for more flexibility in construction, by allowing DOE to postpone some of the classroom wings in the planned new Ewa Makai facility until additional funding becomes available. The main advantage of multi-story schools is that they require a smaller footprint on the site, which allows for more open space on a site. Multi-story construction also facilitates stacking of utilities and shorter utility lines.

The DOE encourages the preservation of open space on its school sites, and therefore strongly supports the use of multi-story structures when appropriate. Typically, this has resulted in the stacking of the classroom buildings. Ten of the last 13 schools built by DOE have had multi-story classroom facilities. The advantages of multi-story schools in terms of reduced site area per student has already been incorporated into the historical design standards used in this report to determine land dedication requirements. Higher than two-story structures might be considered in more urban areas, but are probably not appropriate in West Hawaii.

The U.S. Census Bureau defines an urban area as: "Core census block groups or blocks that have a population density of at least 1,000 people per square mile and surrounding census blocks that have an overall density of at least 500 people per square mile." In 2000, the Census identified resident population per square mile for Hawaii County to be 36.9, no where close to either 1,000 or 500 per square mile. Given this definition, the West Hawaii Impact Fee District would not be defined as being located within an existing urban development.

V. Issues Raised at the November 2008 Hearing

Geographic Exceptions

There are numerous reasons why parents request geographic exceptions (GE) so their children are able to attend schools outside the service area where they reside. The DOE has administrative rules[7] governing the method of granting a student a GE. The decision to grant or deny GE's belongs solely with the principal of each school.

Very little data exists on the number of students applying or receiving GE's at each individual school, at the complex level, or statewide, but the numbers are generally very small. Every

[7] *Hawaii Administrative Rules*, Title 8, Chapter 12, Compulsory Attendance Exceptions

school probably has some outside students coming in to attend that school as well as some students from the area going to schools outside the area. The net effect of GE's on enrollment at most schools is minimal. The number of GE students at individual schools can fluctuate year to year by the actions of one or two families.

When a school is crowded or faces the likelihood of overcrowding, a principal can decide not to accept any GE applications. However, any student residing in the school's service area must be allowed to enroll.

The rules of the federal government's No Child Left Behind Act[8] permit students from failing schools to transfer to schools in better standing. There have been very few requests in West Hawaii for transfers based on the federal Act.

The number of GE's in any school, in any given year, is not statistically significant enough to address school overcrowding issues.

Charter Schools

The Hawaii Revised Statutes (Chapter 302A-1608) is silent as to whether impact fees can or cannot be used for charter schools. The intent of the impact fee is to provide school facilities for the students generated by the development against which the impact fee is levied. Therefore, school impact fees may be utilized for charter schools, provided that school serves a sufficient amount of students generated from the development. A charter school could enroll students from around the island, but would have to provide a specified number of spaces to offset the enrollment impact of the development creating the need for a school.

There are four stand-alone charter schools located in West Hawaii that serve students living in West Hawaii, as well as the rest of the island. The official combined enrollment at the four schools is 624 students for the 2008-2009 school year. That number is approximately 6% of the 10,331 public school students in all of the schools in the Honokaa, Kealakehe and Konawaena complexes combined.

Within the District, Waimea Middle converted from a regular public school to a charter school in 2002 and it continues to operate on a DOE campus. For the purposes of this analysis Waimea Middle is categorized as a regular school because it must continue to serve all students in its service area and the DOE continues to be responsible for its facilities.

Enrollment at the West Hawaii charters has grown swiftly in the nine years since the 2000-2001 school year, when the first two schools opened. All four schools are expected to continue to grow over the next five years, when their combined enrollment is expected to be 982 students in the 2013-2014 school year. Each school is projected to grow at roughly the same rate, and total projected enrollment at each school is approximately 250 students.

Most of the students in the four West Hawaii stand-alone charters live within the boundaries of the proposed West Hawaii School Impact Fee District. Therefore, the projected enrollment growth of 358 charter school students in the next five years (See Table 3) is significant when compared to the total projected growth of 284 students from the regular schools located within, or serving, the impact District.

[8] Public Law 107-110

However, it should be noted that charter schools submit their own enrollment projections. Regular school enrollment projections are generated by DOE Information Resource Management Branch.

Use of Public Land

The primary consideration in determining where to locate a new public school is convenience to public school students. New schools should be located where there will be large numbers of new houses. The DOE locates schools on a case-by-case basis as it negotiates with large landowners, both private and state, and adapts to their development schedules. In the future, it is more likely that larger high school sites will come from state owned land, as few private development projects are large enough to be required to provide 45 to 55 acres for a high school.

The DOE, in the past, has used state land for public schools in situations where large amounts of state land are developed for residential use. For example, all of the schools in the Kapolei (Oahu) and Kealakehe (Hawai`i) developments were built on state lands. The use and responsibility for school land is transferred from the State to the DOE in executive orders from the Governor.

The DOE will continue to seek school sites in any future large development of state land in the same manner as DOE pursues school sites in large developments of private land. Future school sites are reserved in state developments in East Kapolei (Oahu), Keahuolu (Kealakehe), and Lealii (Lahaina). It is highly likely DOE will continue to receive state parcels within state residential developments.

There is no guarantee that DOE will receive state parcels that stand alone, outside of state residential developments. The Department of Land and Natural Resources (DLNR) denied a request from DOE for a school site on state-owned land in East Kapolei after DLNR initially offered the site to DOE. Instead, the parcel was granted to the state's Hawaii Housing Finance and Development Corporation (HHFDC) for residential development. DOE now hopes to work with HHFDC to use a portion of that parcel for a school.

DLNR also turned down a request from DOE to consider state-owned parcels in Kalaoa and O`oma, West Hawaii, for possible school sites.

When private developers provide school sites, they also provide the infrastructure for the school site, including water, sewage and drainage. The private developers also build the roads that provide access to the school sites. If DOE were provided a stand alone state parcel, the additional costs for improving the school site would most likely be borne by taxpayers.

Public Land Trusts

The DOE has the responsibility of operating public schools, which includes providing and maintaining adequate school facilities. It is not the responsibility of the DOE to study and lobby for alternative funding mechanisms for the schools.

The state is currently in a legal controversy over the actual ownership of state lands and how revenues from those lands should be allocated. It is highly unlikely, in this current climate regarding ceded lands, that the state would entertain the idea of creating a new public education land trust, diverting land and revenue that is heavily contested and under current

review by the United States Supreme Court. According to current state law, the DOE is prohibited from owning land.

If the suggestion of a public education land trust was somehow based on the idea that school campuses could be the basis of a public education land trust and then redeveloped for revenue generation, it would be important to acknowledge that roughly 25% of school lands are owned by the counties. It is also extremely doubtful that surplus school lands could generate a revenue stream sufficient to purchase new school sites and build new schools.

Finally, it should be noted that it is the responsibility of the DLNR to manage state lands and maximize revenues from those lands. As DLNR steps up its effort to maximize land revenue to better maintain its recreational resources, it would seem unlikely the state would transfer its revenue generating land into an education land trust.

Department of Hawaiian Home Lands

Please see Appendix C for a response provided by The Department of Hawaiian Home Lands (DHHL).

Kona Community Development Plan

The County of Hawaii General Plan section 15.1 (February 2005, as amended) calls for the preparation of community development plans "to translate the broad General Plan statements to specific actions as they apply to specific geographical areas". The General Plan requires community plans to be adopted as an "ordinance", giving the plans force of law. The Kona Community Development Plan (hereinafter "KCDP") was adopted by the Hawaii County Council on September 25, 2008.

Chapter 4 of the KCDP outlines the goals, objectives, policies and actions relating to land use. Of relevance is the designation of an Urban Area. Section 4.2.2 defines that most of the future growth in Kona will be directed to an Urban Area, as defined in the Official Kona Land Use Map (Figure 4-7). The Urban Area boundaries cover just south of Keauhou, through Kailua-Kona, to just north of Kona International Airport. The KCDP Urban Area is entirely within the District.

Appendix A
Proposed West Hawaii Projects by School Complex and Proposed Number of Units[9]

Project	Owner/Developer	SF	MF	Total
Kealakehe High				
Betsill Bros. Kailua 164 units	Betsill Bros.		164	164
Village 4 & 5 Laiopua (DHHL Kealakehe)	DHHL	363		363
POSTPONED Village 12-14 Laiopua	DHHL	1100		1100
Village 1 & 2	DHHL	520		520
Village 7, 10, 11	DHHL	180		180
Hall 12 unit Kailua	Hall, William E		12	12
Honokohau condos (transient only)	Jacoby Development			0
Hualalai Resort		380		380
Hualalai Village Condominium	AEKO-Hawaii		300	300
Hualalai Vista	Hualalai Vistas LLC		46	46
Iolani	Maryl Group, Inc.			0
Kaloko Makai	Stanford Carr	2512	2500	5012
Kaloko Heights	Stanford Carr	1250	250	1500
Ka`upulehu	3 Developers	630		630
Keahuolu QLT	Undetermined			0
Keahuolu Affordable	HHFDC	330	1876	2206
DHHL Keahuolu	DHHL	730		730
POSTPONED Kona Coffee Estates	Sanford Carr	57	56	113
Kona Hale Alii	Kona Hale Alii, LLC		92	92
Kona Oasis (93 unit Kailua)	Kona Oasis, Inc.		93	93
Kona Seacrest	Sunstone		291	291
Kona Vistas II (lots)	Gamrex, Inc.			0
Kukio 300 sf lots	WB Kukio Resort LLC	450		450
Kula Nei	Shopoff	200	50	250
Lehua Lani	Lehua Lani LLC			0
Lokahi Makai	Westpro (formerly Haseko	7		7
Maniniowali Residential Community	W.B. Maniniowali, LLC	107		107
Nani Kona	Nani Kona Aina LLC	43		43
O'oma 19 lots	O'oma LLC	19		19
Shores at Kohanaiki	Rutter	500		500
Palamanui (Hiluhilu)	Hiluhilu Development LLC	379	740	1116
Seascape Affordables	Westpro Development, Inc.			0
		9757	**6470**	**16224**

Project	Owner/Developer	SF	MF	Total
Waikoloa - mauka residential side				
Aina Lea	Bridge Puako	2066	1203	3269
County Affordable	Co. of Hawaii / Unidev.	500	500	1000
Waikoloa Multi-family	Horton		93	93
Wehilani	Castle & Cooke	404	248	652
Kilohana Kai	Hawn. Island Homes	70		70
Sunset Ridge	Towne			0

[9] Data on proposed projects and units gathered by the DOE.

PASSCO	Netric Passco Waikoloa LLC		300	300
Waikoloa Heights	B&Z	2325		2325
Waikoloa Highlands (rural lots)	Waikoloa Mauka LLC	400		400
Waikoloa - Makai (resort) side				
Ka Milo @ Mauna Lani	A&B/Brookfield			0
Fairways at Mauna Lani	Stanford Carr		54	54
Kulalani at Mauna Lani	Stanford Carr		126	126
Nohona Kai at Maunalani	Stanford Carr	92		92
Future Stanford Carr at Mauna Lani	Stanford Carr			0
Ocean Kona (Mauna Lani)	Ocean Kona Development	76		76
Villages at Mauna Lani	Maryl Group, Inc.			0
Halii Kai (aka Kamalani)	Centex		160	160
Kolea	Centex		60	60
Colony Villas	Stanford Carr			0
		5933	**2744**	**8677**

Project	Owner/Developer	SF	MF	Total
Konawaena High				
Alii Garden Unger	Alii Gardens			0
Alii Parkway Heights	Lava Kuakini		212	212
Hokulia (Villages at Hokukano)	Oceanside 1250			0
Hokulia (other parcels)	Oceanside 1250	58		58
Kahakai development	SCD Kahakai, LLC	14		14
Keauhou (488-acre rural lots)	Kamehameha Investment	307	211	518
Keauhou 46-lot subdivision	Kamehameha Investment	22		22
Keauhou Areas 14A-1 & 14B-1	Kamehameha Investment			0
Keauhou Multi-family 16 units	Kamehameha Investment		16	16
Keauhou Resort Parcel 53	Kamehameha Investment			0
Alii Heights Mauka (Keauhou View Estates)	Towne Development of K	164		164
Keopuka Lands	Pacific Star, LLC			0
Kiilae Estates (lots)	Quill	49		49
La'ipala Makai	Kona Heights, LLC	65		65
La'ipala Heights	Kona Heights, LLC	106	96	202
Pualani Estates Subdivision	D.R.Horton Inc. (Schuler	133		133
Pualani Makai 350 unit rental Kailua	Suffolk Investment, LLC		350	350
Pualani Mauka	Brian Cook	200		200
Uluwehi 21 lots	Uluwehi Properties, LLC			0
		1118	**885**	**2003**
Honokaa High and Intermediate				
Big Island Country Club Homes	Lynch	136		136
DHHL Lalamilo	DHHL	309		309
Honokaa Knolls Subdivision	Pleasant Ridge Corporation	99		99
Mauna Kea--Waiulaula	Moana Ikena/Maryl Group	102		102
Ouli Golf Community	KW-Puako, LLC	300		300
Lualaʻi (Parker Ranch 2020)	Horton	289		289
Ouli Affordable Housing	Hawaii Island Dev Corp	40		40
Pauoa Beach	Colony Capital			
		1275		**1275**
TOTAL				**28,179**

Appendix B
Calculation of Student Generation Rates[10]

A student generation rate (SGR) is a ratio of students expected from a housing unit in a new residential project. A ratio of 0.10, for example, will generate 0.10 students per unit. However, the rate is best expressed in terms of 100 units. Therefore, a ratio of 0.10 will generate 10 students per 100 units. Table 1 illustrates how future enrollments can be projected by multiplying the total number of new units by the appropriate student generation rate. Since a student generation rate focuses on projecting future enrollment from new projects, enrollment at existing school facilities is not part of the analysis.

Table 1
Projecting Future Enrollment Based on SGR

Total New Units	Student Generation Rate	Projected Future Enrollment
200	0.40	80
500	0.32	160

A student generation rate is determined by utilizing existing data from existing residential projects. The rate is computed by dividing the total number of students from an area by the total number of units. To establish the appropriate student generation rates for West Hawaii, a review of these ratios from projects past and current, similar to the impact district was conducted. The table below shows the appropriate student generation rates for West Hawaii after comparing projects comparable to the mix in the impacted district.

Table 2
Representative Student Generation Rates (SGR)

School Grade Level	Single-Family Unit SGR			Multi-Family Unit SGR		
	Afford	Middle	Luxury	Afford	Middle	Luxury
K-5 Elementary	0.40	0.32	0.01	0.30	0.20	0.01
6-8 Middle	0.20	0.18	0.01	0.15	0.10	0.01
9-12 High School	0.25	0.22	0.01	0.18	0.10	0.01

Two factors that account for the variety of rates are the type of units and income range. When comparing unit types, there may be differences, for example in bedroom sizes between a single-family affordable unit and a multi-family affordable unit. When comparing the range of income, an affordable single-family unit may have smaller bedrooms and living area compared to a middle or luxury single family unit. The different characteristics in the type of units generate different amounts of students.

SGRs vary by grade level grouping due to a difference in the number of grades in each grade level and grade-level enrollment trends. An elementary school K-5 has 6 grades, a middle school 6-8 has 3 grades and a high school 9-12 has 4 grades. Also, enrollment tends to decrease as the grade levels get higher due to a variety of factors including students entering the job market and dropping out.

[10] Information compiled by the DOE Information Resource Management Branch

From this mixture of rates, a single set of SGRs for West Hawaii was determined to represent all single-family and multi-family units in the district. In the following table, the middle unit student generation rates best represented the appropriate combined ratios for West Hawaii. These ratios do not reflect the higher rates of the affordable units or the lower rates of the luxury units.

Table 3
West Hawaii Student Generation Rates

School Grade Level	Single-Family SGR	Multi-Family SGR
K-5 Elementary	0.32	0.20
6-8 Middle	0.18	0.10
9-12 High School	0.22	0.10

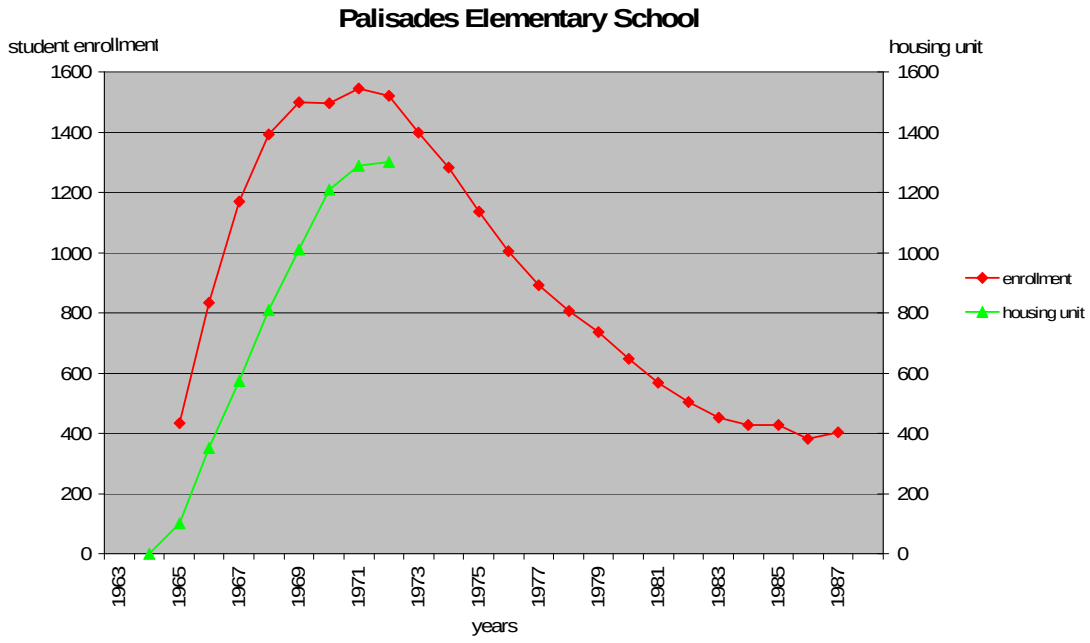
Student generation rates are based on a residential project or a community that has achieved stability and where schools are no longer impacted by large changes in enrollment. This indicates that developments move through different stages relative to enrollment. This can be explained by the "Aging of the Community" concept which describes 4 main periods that pattern enrollment trends:

- Growth
- Peak
- Decline
- Stability

Palisades Elementary School is an example of the aging of a community. Its enrollment and community housing history from 1963-1987 is seen in the following graph where the left-vertical axis is student enrollment; right-vertical axis is housing unit and the horizontal-axis years.

Graph 1

Enrollment Cycle



The lower (green) line reflects the start of the housing development cycle with 100 units completed in 1965. The upper (red) line represents student enrollment. During the time of development growth, a similar trend in enrollment occurred. This was also the beginning of the family cycle. Young couples with 0 to 1 child began moving in and as years passed may have had a 2nd child. In 1971 the project was build-out. This began the decline in enrollment as children moved through and exited the school system.

Appendix C
A Response from the Department of Hawaiian Home Lands

The Department of Hawaiian Home Lands (DHHL) has gone from having very little property in Kona, to becoming a major developer of housing in West Hawaii, on former state owned property that was transferred to the Home Lands' trust. The DHHL has completed a subdivision in Kealakehe, called the Villages of Lai`opua and is in the process of developing two more. DHHL is also responsible for large tracts of land in the Waimea and Kawaihae areas that have been part of the trust program for many decades.

Because the DHHL does not need state or county land use approvals, it has not been required to provide land and fair-share contributions to the DOE. DHHL acknowledges that its communities need schools but is of the opinion that it should not be required to pay such impact fees to the DOE. A major reason of this opinion is the fact the DHHL is a state agency that develops homes in accordance with the Hawaiian Homes Commission Act of 1920, as amended (Act). The policy of this Act is to "enable native Hawaiians to return to their lands in order to fully support self-sufficiency for native Hawaiians and the self-determination of native Hawaiians in the administration of this Act, and the preservation of the values, traditions, and culture of native Hawaiians."

Everyday, DHHL operates to achieve the policy as stated in the most unique way. As noted, DHHL develops homes as a state agency and not as a private for-profit developer, or even as a non-profit organization. DHHL uses funds out of Act 14 and revenues generated by its income-producing properties. It does not generate any profits in the sale of homes to its beneficiaries. If DHHL was a for-profit organization, it would be selling its homes at a loss. For example, the cost to construct a residential lot and provide it with the necessary infrastructure, such as water, drainage, sewer and utilities, may cost up to $200,000 per lot, depending on its location. The cost for the development of the lot is not passed on to the beneficiaries. Only the cost of the home is passed on to the beneficiaries and DHHL does not recover the cost of constructing the lot. A private for-profit developer or a non-profit would include the cost of any impact fees into the sales price of the home to recapture the fee as well as any cost to construct the lot. Another major reason for DHHL not to pay the impact fee is the fact that DHHL is returning the native Hawaiians to the land, land that they were originally on.

It is unknown whether DHHL would be legally compelled to pay impact fees when they develop new housing. DHHL is of the opinion, however, that any legislation can be created so DHHL is exempt from paying such fees for the reasons cited above.

Appendix D
The Fee Schedule

Estimate of Impact Fees in West Hawaii Impact Fee District
Based on W. Hawaii Impact District Student Generation Rates and
1997 to 2007 Historical School Land and Construction Amounts Provided

# of units	Type of unit	Est. # students, all grade levels	Construction Requirement		Land Requirement	Total Fee-in-Lieu of Land Requirement		
			Per unit	Total	In acres	$300k/Ac.	$400k/Ac.	$500k/Ac.
1	SF	0.72	$3359	$3359	0.0137*	$4,110	$5,480	$6,850
100	SF	72	$3359	$335,900	1.37	$411,120	$548,160	$685,200
500	SF	360	$3359	$1,679,500	6.85	$2,055,600	$2,740,800	$3,426,000
1000	SF	720	$3359	$3,359,000	13.70	$4,111,200	$5,481,600	$6,852,000
1	MF	0.4	$1796	$1796	0.0073**	$2,190	$2,920	$3,650
100	MF	40	$1796	$179,600	0.73	$218,400	$291,200	$364,000
500	MF	200	$1796	$898,000	3.64	$1,092,000	$1,456,000	$1,820,000
1000	MF	400	$1796	$1,796,000	7.28	$2,184,000	$2,912,000	$3,640,000
* 597 square feet								
**318 square feet								