



DATE: June 1, 2016

TO: Dr. Stephen Hanke, Superintendent, Dublin Unified School District

FROM: Lisa Vorderbrueggen, BIA|Bay Area East Bay Governmental Affairs

RE: Draft 2016 School Facilities Needs Analysis

Dear Dr. Hanke,

Thank you for the opportunity to submit a series of questions related to DUSD's 2016 School Facilities Needs Analysis. Given the significant proposed increase in the Level II fee, our members requested an in-depth review of the SFNA and greater detail about the sources of the proposed 55 percent fee hike. DUSD and residential developers are both coping with the impacts of increased development costs, so I am confident that you understand the importance of conducting due diligence at every level.

To that end, here are our questions:

1. The number of unmitigated units identified in the district's 2016 SFNA reflects a substantial increase from the 2015 estimate, rising from 927 to 1,719, or 85.4 percent. Would you please explain this increase?
2. The 2016 SFNA identified 2,236 mitigated units projected for the next five years but the 2015 SFNA did not identify mitigated units. How many mitigated units did DUSD project in 2015? And where specifically will the mitigated students attend school?
3. With respect to the total number of residential units projected, did DUSD obtain written confirmation of those numbers from the City of Dublin? If so, would you please provide us a copy?
4. Both the 2015 and 2016 SFNAs identify the district's total capacity at 9,143 students. Education Code Section 17071.35 provides for adjustments based on pupils reported pursuant to Section 42268. Has the district reported pupils under that section since 2009? Please provide information regarding the district's reporting of pupils per this statute (if any).
5. The 2016 SFNA appears to rely on student generation rates that were based on a sampling of units, per DUSD's methodology specified in its Fall 2015 draft projections. How many units were included in the samples for each type of unit?

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6. The 2016 SFNA uses the 10.2-acre JM Amador Elementary School site as the basis of its estimated site acquisition costs. DUSD has indicated that it expects it will be reimbursed by the state for costs related to this school. Has the state agreed to fund this project, specifically at the rate of \$482,964 per acre? What type of documentation does the district have confirming that the state has signed off on these costs?
7. Did the SFNA double count general site development costs? Gov't Code 65995.5(c) (1) states that the number of unhoused pupils "shall be multiplied by the appropriate amounts provided in subdivision (a) of [Education Code] Section 17072.10." The per pupil grant amounts are set by statute in Education Code Section 17072.10 subdivision (a). The SFNA, however, multiplies the number of unhoused pupils by a combination of the grant amount in Education Code §17072.10 (a) added to the separate grant amount for general site development in Section 17072.10 (b). The SFNA includes general site development in the first step of the fee calculation. The SFNA then appears to include general site development again pursuant to the site acquisition and site development provisions in §65995.5(h). That section governs the calculation of site acquisition and site development for purposes of the SB Fee calculation and expressly caps those components. With respect to site development pursuant to §65995.5(h), the SFNA provides an estimate of total site development costs expressed as a per acre cost by grade level. The SFNA provides no indication that this total site development cost does not include general site development costs. By apparently including general site development costs in this part of the calculation, while also including general site development in the per pupil grant amount, the SFNA appears to double count general site development.
8. The 2015 SFNA assumed no land acquisition costs for the district's next K-8 school. At the time, the SFNA notes that DUSD and the City of Dublin had an MOU for a site lease. But the 2016 SFNA included land acquisition costs for that same site, noting that the agreement reached between the city and DUSD on March 8, 2016, included an option for the district to purchase the land. As I understand it, the district wanted to preserve its ability to request state reimbursement for land acquisition costs. In either case, the district is not paying for the site out of its funds. Why did the district change its treatment of land acquisition costs here? What would the Level II and Level III fees be if the land acquisition costs were treated in 2016 the same as they were in 2015?
9. The 2016 SFNA states that the land value of the 10.2 acre Amador site was based on a land appraisal dated May 27, 2014. Would you please provide us a copy of the appraisal?

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10. The district's total site cost for a K-8 school is based on a site size of 13.4 acres. Where are the proposed K-8 school sites located and what are the acreages for each?
11. For the district's second high school, your total site costs are based on the SB 50 maximum size of 47.1 acres for 2,500 students. Given that the SFNA is intended to measure impacts of the next five years and that the district has said that it only needs a high school for 1,500 students within that time period, why didn't the district base its SB 50 calculation on a 1,500-student school? What parcels are under consideration for the new high school and what are the acreages for each of the sites?
12. The 2015 SFNA incorporated \$28,000 a year in rental income from Nielsen Education while the 2016 SFNA appears to make no mention of Nielsen. Why wasn't rental income credited in 2016?
13. The estimated cost impacts to the district attributed to 1,288 inter-district and currently unhoused students is \$161.5 million. In what time period did the district incur these costs? What facilities were constructed for these students? Where specifically do these students attend school today?

Thank you very much for taking time to meet with BIA representatives last week. Please confirm your receipt of this communication and let me know when I may expect your reply. BIA is preparing a comment letter on the 2016 SFNA and the proposed Level II and Level III fee public hearing set for June 14, 2016, and intends to rely on the requested information to inform our comments.

Sincerely yours,

A handwritten signature in cursive script that reads "Lisa Vorderbrueggen".

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