

CITRUS HEIGHTS NORTH SPECIFIC PLAN FINAL ENVIRONMENTAL IMPACT REPORT

State Clearinghouse No. 2003111125

Prepared for

CITY OF FONTANA
COMMUNITY DEVELOPMENT DEPARTMENT

Prepared by

ULTRASYSTEMS ENVIRONMENTAL, INC.

MAY 2004

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**CITY OF FONTANA
COMMUNITY DEVELOPMENT DEPARTMENT
PLANNING DIVISION
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MAY 2004

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SUMMARY

This Final Environmental Impact Report (FEIR) for the proposed Citrus Heights North Specific Plan in the City of Fontana consists of the separately published Draft Environmental Impact Report (DEIR) (March 2004) and with this volume, which contains a Summary, Errata for the DEIR (Section 1), Comments and Response to Comments (Section 2), and School Facilities Analyses (Appendix A).

The objectives of the proposed project are:

- To provide a high-end residential community with a complementary mix of housing types that will contribute to the range of existing housing choices in north Fontana;
- To provide a convenient "walking-distance" neighborhood commercial center with retail businesses;
- To create a unique and distinctive residential community identity and character through control of project design elements such as architecture, landscaping, walls, signage, private streets, pocket parks, and access-controlled (gated) entries;
- To implement a plan that is sensitive to the surrounding environment and aesthetically pleasing; and
- To provide infrastructure systems to support the project and contribute to Fontana's roadway and circulation system improvements, including the installation of streetscape landscaping along the project's frontage.

The Citrus Heights North Specific Plan project proposes to construct the following elements on a 212-acre vacant site in the northwestern portion of the City of Fontana, north of Summit Avenue between Lytle Creek Road and Citrus Avenue: 802 single-family homes; 425 multifamily dwelling units; a 9-acre neighborhood retail center; recreational amenities including small parks and a community sports center; infrastructure improvements to the water, wastewater, and drainage systems; and improvements to adjacent roadways and the City's circulation system (including a northern extension of Knox Avenue).

The surface streets bounding the site are Citrus Avenue on the east, Summit Avenue on the south, and Lytle Creek Road on the west. The western two-thirds of the site is bounded on the north by the right-of-way for Three Mile Road, while the eastern one-third of the site extends about ¼ mile further north. The site is traversed by two utility easements, neither of which is part of the project; a 450-foot northeast-southwest corridor with power transmission towers, used by Southern California Edison (SCE), Southern California Gas (SCG), and the Metropolitan Water District (MWD); and a 300-foot east-west corridor used by MWD.

The residential dwelling units would be located on 177.0 acres of the project site. The single-family lots would range in size from 4,200 to 10,000 square feet. The neighborhood commercial area would be located on 9 acres on the northwest corner of Summit Avenue and Citrus Avenue. There would be three private recreation areas and an 11.3-acre park located near the southwest corner of the project site, which also would function as a detention basin. Adjacent to the detention basin/park would be a 3.6-acre (public) community sports center. The residential acreage would include internal streets and common areas such as expanded entries and pocket parks (in addition to the designated parks). The gross acreage includes future areas for public right-of-way improvements to Summit Avenue, Citrus Avenue, and Lytle Creek Road.

In Letter #3, the Fontana Unified School District (in a letter written on behalf of FUSD by Parker & Covert, attorneys at law) commented extensively on the DEIR's discussion of impacts on public schools. The FUSD cited its student generation factors, which are the same factors as were used in the DEIR to estimate the number of new students from the proposed project. However, the City points out that the actual number of students generated by the adjacent Sierra Lakes residential development (which is similar in type of housing to the proposed project) is much lower than would have been predicted using the FUSD factors, and that the FUSD may be overestimating both the number of additional students that would be generated by the proposed project and the associated school facilities costs.

FUSD noted that the existing schools that would service the proposed development are at or above capacity, and that its total enrollment is projected to increase in the next five years from 40,400 to 46,750 students. In particular, both Sierra Lakes Elementary School and A.B. Miller High School are already at capacity and could not accommodate the proposed project's additional students, although Summit High School is scheduled to open in September 2005 with a capacity of 2,880, and will be adjacent to the project site. The City responded that, although the project's elementary school students could not be accommodated at Sierra Lakes School, Summit High School would accommodate the project's new high school students, which are projected to number 368 at most.

The costs of providing school facilities are estimated by FUSD to be \$24,909 per new dwelling unit. Using an average residence size of 1,967 assessable square feet (sf), the authorized school fee to be paid by developers of \$5.69 per residential square foot, and the authorized fee of \$0.34 per commercial square foot, FUSD projects that it would raise only \$11,192 per project dwelling unit. FUSD estimates the total cost of serving the proposed project to be over \$30,000,000 (including per-student costs and additional buses and relocatable buildings), and concludes that the project would cause a significant shortfall in facilities construction funds for which full mitigation would require the developer fee to be \$12.66/sf. The City notes that school facilities have other sources of funding, such as property taxes and State funding to expand school capacity, including more than \$166,000,000 that FUSD has received (between late 2002 and early 2004) for new construction that is authorized by Proposition 47.

FUSD states that at least one new elementary school needs to be built near the project site, and cites the DEIR's conclusion that the proposed project would have a significant impact on schools. The City agrees that the DEIR does find a significant impact, but notes that this finding is an initial conclusion that applies only before consideration of the mandated developer fees, which would mitigate the impact to less than significant. FUSD believes that the DEIR should discuss pedestrian safety (particularly the danger of heavy arterial traffic to students), that any new elementary school should be sited north of Summit Avenue (to avoid increased traffic on Summit Avenue), and that the EIR should incorporate pedestrian safety mitigation measures on Summit Avenue near the planned Summit High School. The City points out that pedestrian safety depends on many factors other than traffic volume, and that EIRs typically do not address increased pedestrian risk related to traffic volume unless an intersection or roadway segment has had a higher incidence of accidents than normal.

In Letter #4, the California Department of Conservation commented that the proposed project site is not inside an oil or gas field, and that there are no known oil, gas, or injection wells on the site. As requested by the Department, the City agrees to notify the Division of Oil, Gas, and Geothermal Resources if any unrecorded well is discovered on the project site.

In Letter #5, Omnitrans described the local bus service that it plans to implement in the project area, including potential stops along Summit Avenue at the intersections of Knox Avenue and Citrus Avenue, and suggested certain pedestrian amenities, possible bus turnouts, and curbside lanes wide enough to accommodate buses stopping without impeding traffic. Omnitrans offered the assistance of its staff during the design of transit shelters and other bus-related infrastructure, and the City stated that it will take into consideration the established standards of Omnitrans.

The environmental impacts associated with the No-Project—No-Build Alternative would result in the least environmental impacts, but this alternative would not satisfy the project objectives. The No-Project—Reasonably Foreseeable Future Use of the Site Alternative with future residential and neighborhood commercial development would also result in similar or less environmental impact as the proposed project, but also fails to address all the project objectives of the *Citrus Heights North Specific Plan*.

An EIR considers a reduced-project alternative to determine whether such an alternative could reduce or avoid the project's significant or potentially significant adverse environmental effects. The Reduced-Project Alternative would consist of a housing development and small neighborhood commercial center on the same 211.9-acre project site, consistent with the existing *City of Fontana General Plan* zoning designations, but with a lower residential and commercial density than that of the proposed project.

The Reduced-Project Alternative would generally result in reduced environmental effects compared with those of the proposed project. However, the Reduced-Project Alternative would not achieve (to the same extent as the proposed project) the density and mix of housing as the proposed project. Nor would this alternative develop the land to its maximum potential as planned and intended by the City, as expressed in the *General Plan* zoning designations and planned buildout in northern Fontana. The Reduced-Project Alternative would still result in potentially significant, adverse air quality impacts that cannot be mitigated to levels of insignificance.

As with the Reduced-Project Alternative, an EIR considers an alternative site design to determine whether such an alternative design could reduce or avoid the project's significant or potentially significant adverse environmental effects. The Alternative Site Design Alternative would consist of a housing development that would be consistent with the existing *General Plan* designation of R-PC, but at a different location than the site of the proposed project. The environmental impacts of the Alternative Site Design are similar to those of the No-Project—Reasonable Foreseeable Future Use of the Site Alternative, so are generally considered in the impact discussions in Section S.3.1. The environmental impacts of the Alternative Site Design would result in similar environmental impacts as the proposed project, and would not reduce the potentially significant, adverse environmental impacts compared to those of the proposed project. This alternative also fails to address all the project objectives of the *Citrus Heights North Specific Plan*.

For the reasons given below, the City rejected the following three alternatives: No-Project Alternative, Reduced-Project Alternative, and Alternative Site Design.

This No-Project Alternative would result in no significant impacts associated with a physical change in the environment because the construction of the residential development with neighborhood retail and recreational amenities would not occur, and the project site would remain vacant. With this alternative, the vacant site would not satisfy any of the project's objectives. Although the No-Project—No-Build Alternative would be an environmentally superior alternative, this alternative would fail to address any of the project objectives, as stated in the *Citrus Heights North Specific Plan*. The No-Project—Reasonably Foreseeable Future Use of the Site would result in impacts similar to those of the proposed project, and would fail to meet some of the project objectives.

The Reduced-Project Alternative would not fully meet the project objectives. This alternative would result in environmental effects that would be generally reduced from those of the proposed project. However, this alternative would still result in potentially significant, adverse air quality impacts that could not be reduced to levels of insignificance.

The Alternative Site Design would not fully meet the project objectives and its environmental impacts would be similar to those of the proposed project.

Table S-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES
Citrus Heights North Specific Plan, Fontana

<i>Potential Environmental Impact</i>	<i>Mitigation Measure(s)</i>	<i>Level of Significance After Mitigation</i>
Air Quality		
During construction activities, the proposed project will generate criteria pollutant emissions that exceed SCAQMD thresholds for NO _x from the operation of construction equipment and dust during grading.	AQ-1 During construction, the construction manager shall ensure that oxidation catalysts are in use on all diesel construction equipment.	Less than Significant in Construction Phases 1, 2, and 4; Potentially Significant in Phase 3
	AQ-2 During construction, the construction manager shall ensure that aqueous diesel fuel is used for construction equipment.	
	AQ-3 During construction, the construction manager shall ensure that equipment engines are maintained in proper tune and ensure that all construction equipment are properly serviced and maintained in good operating condition.	
	AQ-4 During construction, the construction manager shall ensure that the continuous idling of any construction equipment is restricted to 10 minutes.	
	AQ-5 During construction, the construction manager shall ensure that catalytic converters are used on all gasoline equipment (except for small 2-cylinder generator engines).	
	AQ-6 During construction, the construction manager shall cease construction during periods of high ambient O ₃ concentrations (i.e., Stage-2 smog alerts) near the construction area.	
	AQ-7 During construction, the construction manager shall schedule all material deliveries to the construction site outside of peak traffic hours, and minimize other truck trips during peak traffic hours, or as approved by local jurisdictions.	
	AQ-8 During construction, the construction manager shall utilize as much as possible precoated and/or natural-colored building materials; water-based or low-VOC coatings; and coating transfer or spray equipment that has high transfer efficiency, such as the high-volume, low-pressure (HVL _P) spray method; or manual application of coatings (such as using a paint brush, hand roller, trowel, spatula, dauber, rag, or sponge).	
	AQ-9 During project design, the applicant shall incorporate structural-related emission-reducing technologies, such as insulation beyond Title 24 Standards of the Uniform Building Code (UBC) and efficient electrical equipment such as lower wattage lighting.	
	AQ-10 As requested by the City or County, the applicant shall incorporate trip-reduction measures into the project design, including bicycle racks, pedestrian amenities, street lighting, and public transportation facilities.	
ROG emissions for architectural coating operations could cause ROG emissions exceedances.		Less than Significant
Operation of the proposed project and vehicular traffic generated by the proposed project could generate NO _x and ROG that would exceed SCAQMD thresholds.		Significant

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Citrus Heights North Specific Plan, Fontana

<i>Potential Environmental Impact</i>	<i>Mitigation Measure(s)</i>	<i>Level of Significance After Mitigation</i>
Noise		
Construction-related activities, primarily site preparation and building construction, would result in significant short-term noise impacts.	<p>N-1 Construction activities shall comply with §18-63 (9) of the Fontana Municipal Code, which states that construction noise is limited to weekdays, between 7:00 A.M. and 6:00 P.M.</p> <p>N-2 All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers.</p> <p>N-3 Stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers.</p> <p>N-4 Stockpiling and vehicle-staging areas shall be located as far as practical from noise-sensitive receptors during construction activities.</p> <p>N-5 When necessary, use temporary sound barriers to reduce the impact of construction noise.</p>	Less than Significant
Public Services		
The proposed project would require extending public services into an area currently not requiring significant levels of services by the City (as it is vacant) and providing additional public services that would be needed by the project's residents, employees, commercial patrons, and property owners.	<p>PS-1 The developer will pay all City of Fontana development impact fees to the City before issuance of a building permit to pay the developer's share of the increased cost of services such as fire and police protection, other emergency services, public schools, and public libraries.</p>	Less than Significant
Recreation		
The increased number of residents would create increased demand on the City's existing parks and recreation staff, services, and facilities.	<p>PS-1 The developer will pay the City of Fontana Park Fee to the City before issuance of a building permit to pay the project's share of the City's increased costs related to parks and recreation facilities.</p>	Less than Significant

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<i>Potential Environmental Impact</i>	<i>Mitigation Measure(s)</i>	<i>Level of Significance After Mitigation</i>
Under year 2025 with-project conditions, seven freeway segments would not meet the CMP's LOS E standard., and lane additions would be required to improve freeway operations in accord with CMP requirements.	<p>TT-15 I-15, between Foothill Boulevard and Baseline Road: Add three northbound mixed-flow lanes; add one northbound high-occupancy-vehicle (HOV) lane; add two southbound mixed-flow lanes; add one southbound HOV lane.</p> <p>TT-16 I-15, between Baseline Road and SR-210: add two northbound mixed-flow lanes; add one northbound HOV lane; add two southbound mixed-flow lanes; add one southbound HOV lane.</p> <p>TT-17 I-15, between SR-210 and Summit Avenue: add three northbound mixed-flow lanes; add one northbound HOV lane; add four southbound mixed-flow lanes; add one southbound HOV lane.</p> <p>TT-18 SR-210, between Day Creek Boulevard and I-15: add two eastbound mixed-flow lanes; add two westbound mixed-flow lanes.</p> <p>TT-19 SR-210, between Citrus Avenue and Alder Avenue: add one eastbound mixed-flow lane; add one westbound mixed-flow lane.</p> <p>TT-20 SR-210, between Alder Avenue and Riverside Avenue: Add one eastbound mixed-flow lane.</p> <p>TT-21 SR-210, between Riverside Avenue and Pepper Avenue: Add one eastbound mixed-flow lane; add one westbound mixed-flow lane.</p>	Less than Significant
Utilities and Service Systems		
Additional stormwater drainage facilities are expected to be required due to the increase of impermeable surface area.	US-1 The project proponent will pay Storm Drainage Fees according to the City of Fontana's Comprehensive Fee Schedule.	Less than Significant

1—ERRATA FOR THE DRAFT EIR

The following errata specify revisions to the text of the Draft Environmental Impact Report (DEIR) (March 2004) for the Citrus Heights North Specific Plan in the City of Fontana.

These revisions to the DEIR have been made in response to written letters of comment submitted by governmental and other public agencies to the City of Fontana (City) during the public circulation period (March 22 to May 6, 2004) of the DEIR. Each erratum is cross-referenced to one or more comment(s), as itemized and reproduced in Section 2. Deleted text is designated by strikethrough ("~~strikethrough~~"); added text is designated by underscoring ("underscoring").

DEIR, Page 3-162

In Section 3.14.2.4, Environmental Impact Analysis, Utilities and Service Systems, Environmental Impact Analysis, Project Impacts, Water Supply, Projected Water Usage, revise text as follows:

Projected Water Usage. The factors used by the Fontana Water Company (FWC) to estimate water usage are:

- Single-Family Residential: ~~270 900~~ gallons per day (gpd) per unit
- Multifamily Residential: ~~270 500~~ gpd per unit
- Commercial Property: 3,000 gpd per (gross) acre; and
- Parkland: 4,000 gpd per (gross) acre.

Using these factors, the daily water usage of the proposed project would be a total of ~~391,200~~ 994,210 gallons, calculated as follows:

- Single-Family Residential: 802 units multiplied by 270 900 gallons per day (gpd) per unit = ~~216,540~~ 721,800 gpd;
- Multifamily Residential: 425 units multiplied by 270 500 gpd/unit = ~~114,750~~ 212,500 gpd;
- Commercial Property: 117,600 square feet¹²⁰ multiplied by 100 gpd/1,000 sq. ft. = 11,760 gpd; and
- Parkland:¹²¹ 21.4 acres multiplied 2,250 gpd/acre = 48,150 gpd.

DEIR, Page 3-163

In Section 3.14.2.4, Environmental Impact Analysis, Utilities and Service Systems, Environmental Impact Analysis, Project Impacts, Water Providers, Water Supply Assessments, revise text as follows:

Water Supply Assessments. In compliance with CEQA Guideline §15083.5, the City of Fontana requested (on January 28, 2004) the FWC and the WVWD to prepare water supply assessments for the proposed project, supporting their stated capabilities of supplying water to the project. ~~These assessments are due to the City by April 26, 2004, and before the City approves the project. WVWD has submitted its analysis (dated April 22, 2004) to the City; submittal of the FWC analysis was still pending at the time of publication of this FEIR.~~

2—COMMENTS AND RESPONSE TO COMMENTS

1.1 INTRODUCTION

Pursuant to §15086, 15087, and 15105 of the *State CEQA Guidelines*, the Draft Environmental Impact Report (DEIR) on the Citrus Heights North Specific Plan was publicly circulated or otherwise made available for public review and comment for a CEQA-mandated period of forty-five days, beginning on March 22, 2004, and running through May 6, 2004.

The City of Fontana received seven written comments on the DEIR within the review and comment period. The City also received one comment letter after the May 6, 2004, deadline, which, however, was postmarked April 28, 2004, before the deadline. In accordance with *State CEQA Guidelines* §15088, the City has evaluated each written comment in these eight letters, and has prepared a written response to each environmental concern raised by the authors.

1.2 COMMENT LETTERS RECEIVED

<i>Letter</i>	<i>Commenter</i>	<i>Affiliation</i>	<i>Date on Letter</i>	<i>Date Received</i>
1	Lon Tsai Chief Engineer	West Valley Water District	4-01-04	On/before 4-13-04
2	Michael J. McGraw General Manager	Fontana Water Company	4-05-04	On/before 4-13-04
3	Jonathan J. Mott Parker & Covert, LLP	Fontana Unified School District	4-12-04	On/before 4-13-04
4	Paul Frost Associate Oil & Gas Engineer	California Department of Conservation	4-22-04	4-26-04
5	Mervin Acebo Associate Planner	Omnitrans	4-22-04	4-26-04
6	Rita Kurth Water Resource Administrator	Cucamonga Valley Water District	4-29-04	5-05-04
7	Samuel Martinez Analyst	Local Agency Formation Commission	5-05-04	5-05-04
8	Jeffrey M. Smith, A.I.C.P. Senior Regional Planner	Southern California Association of Governments (SCAG)	4-28-04	5-11-04

1.3 COMMENT LETTERS AND RESPONSES BY CITY

See following pages for copies of all comment letters received and the City's responses to them.

Response to Comment Letter 1, from West Valley Water District

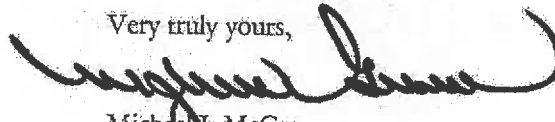
- Response 1a:** The City of Fontana has received the Water Supply Analysis (dated April 22, 2004) from the West Valley Water District. The analysis concludes that “WVWD’s existing potable water supply is sufficient to supply the Citrus Heights North Specific Plan for the planned 560 residential units.” (The project’s remaining residential units are in the portion of the project site that would be served by the Fontana Water Company.)
- Response 1b:** Comment noted. These required infrastructure improvements have been added to Page 3-163 (Section 3.14.2.4, Water Supply, Water Providers, West Valley Water District [WVWD]), of the EIR.

City of Fontana
Page 2
April 5, 2004

Fontana Water Company remains ready, willing, and able to furnish public utility water service and provide for all of the water service requirements for the Citrus Heights North development. }

If you should have any question, or require additional information about water supply to the proposed project, please call me.

Very truly yours,



Michael V. McGraw
Manager

MJM:bf
Enclosure

Ultra Systems

Page 2

December 22, 2003

1. *Question – What is the capacity of your water storage, treatment, supply, and transmission system (e.g., reservoirs, transmission mains, and local water mains) in the project area?*

Response – The Company currently has 12 reservoirs in service with a total capacity of 31 million gallons (mg) of storage. In addition, one new 3 mg reservoir is under construction and is expected to be in service by the end of the year.

The Company owns and operates a surface water treatment plant capable of treating up to 20 mgd of a combination of both surface water and State Water Project water. Total water supply capacity which includes both surface as well groundwater sources is approximately 105 mgd, although capacity can vary significantly due to drought conditions and/or groundwater contamination.

The Company produces water for domestic uses from stream flow in Lytle Creek, a horizontal tunnel, and 37 water production wells in the Chino groundwater basin, the Lytle Creek Region, the Colton-Rialto Basin, and elsewhere. In addition, the Company's infrastructure includes more than 500 miles of pipeline which form a completely integrated water system that has the capacity to produce, transport and deliver water throughout the Company's service area. The company has water mains of sufficient size in streets bordering the project site capable of meeting the water demand requirements of the development and those facilities can be extended to provide water utility service to the project.

2. *Question – Does your agency have adequate capacity to meet the water demand of this project?*

Response – Yes, the Company has access to ample water resources that are capable of meeting the anticipated water requirements of the project.

3. *Question – Does your agency have adequate facilities to provide water service to the project?*

Response – Yes, as mentioned above, the Company has facilities of sufficient size near the project site that can be readily extended to provide service.

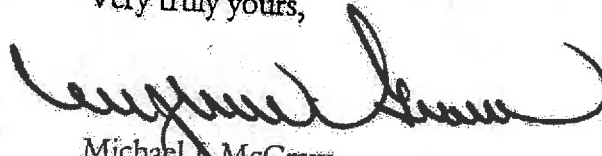
4. *Question – Will any water supply, treatment, storage, or transmission facilities need to be constructed or expanded to accommodate the water demand and service requirements of this project?*

Response – Yes. The Company will determine what additional water facilities are necessary to provide service to the Citrus Heights North project once we have had

Ultra Systems
Page 4
December 22, 2003

Fontana Water Company, a division of
San Gabriel Valley Water Company
Attention: Mr. Michael J. McGraw, General Manager
8440 Nuevo Avenue
Post Office Box 987
Fontana, California 92334
Telephone: (909) 822-2201

Very truly yours,



Michael J. McGraw
General Manager

MJM:bf
Enclosure

Response to Comment Letter 2, from Fontana Water Company

Response 2a: The text on Page 3-162 of the DEIR (in Section 3.14.2.4, Environmental Impact Analysis, Utilities and Service Systems, Environmental Impact Analysis, Project Impacts, Water Supply, Projected Water Usage) has been revised as follows for the FEIR:

"Projected Water Usage. The factors used by the Fontana Water Company (FWC) to estimate water usage are:

- Single-Family Residential: ~~270~~ 900 gallons per day (gpd) per unit
- Multifamily Residential: ~~270~~ 500 gpd per unit
- Commercial Property: 3,000 gpd per (gross) acre; and
- Parkland: 4,000 gpd per (gross) acre.

Using these factors, the daily water usage of the proposed project would be a total of ~~391,200~~ 994,210 gallons, calculated as follows:

- Single-Family Residential: 802 units multiplied by ~~270~~ 900 gallons per day (gpd) per unit = ~~216,540~~ 721,800 gpd;
- Multifamily Residential: 425 units multiplied by : ~~270~~ 500 gpd/unit = ~~114,750~~ 212,500 gpd;
- Commercial Property: 117,600 square feet¹²⁰ multiplied by 100 gpd/1,000 sq. ft. = 11,760 gpd; and
- Parkland:¹²¹ 21.4 acres multiplied 2,250 gpd/acre = 48,150 gpd."

(Footnotes 120 and 121 remain unrevised.)

Response 2b: As of the publication date of this FEIR, receipt of the Fontana Water Company's Water Supply Assessment is still pending.

Response 2c: Comment noted.

PARKER & COVERT LLP

Orlando Hernandez
 April 12, 2004
 Page 2

Therefore, it is anticipated that this project will generate 810 K-5 students, 368 students in grades 6-8, and 368 students in grades 9-12.

3A
 cont.

Impact on the District's Facilities

The District currently operates 26 elementary, 8 middle, and 3 comprehensive high schools with a current enrollment in excess of 40,401 students. The existing schools that would serve this project are already at or above capacity and will not be able to accommodate all of the students expected to be generated from this project in addition to students to be generated from other projects within the District in the next five years. According to the District's enrollment projections, total enrollment by 2006-7 will be over 46,750.

3B

Sierra Lakes Elementary School, 5740 Avenal Place, adjacent to the project at its southeast corner has a capacity of 615 and current enrollment of 604. It lacks capacity for the estimated 810 new elementary school students from this project.

A.B. Miller High School, 6921 Oleander Ave., has a capacity of 3,768 and current enrollment of 3,584. Adding the estimated 368 new high school students from this project would leave it overcrowded. As noted in the draft EIR, Summit High School, 15551 Summit Avenue, adjacent to the project at its southwest corner, is scheduled to open in September 2005 with a capacity of 2,880.

3C

The District's current cost of providing new grade K-12 facilities is \$24,909 per dwelling unit. The District is currently authorized to collect \$5.69 per square foot of assessable space on new residential construction pursuant to Government Code sections 65995, 65995.5 and 65995.6. The District has adopted a resolution to that effect. However, for an average multi-family attached residential unit of 1,967 square feet, the amount raised from fees would be \$11,192 as opposed to the actual cost of school facilities of \$24,909. It is clear that the \$5.69 per square foot fee does not provide nearly enough funds for the District to provide the necessary school facilities. The District's current estimated costs for new elementary, middle, and high schools are as follows:

3D

Elementary School:	\$12,476,566 (733 students)
Middle School:	\$25,117,090 (1,400 students)
High School:	\$56,504,732 (2,500 students)

EWFP040-FinanceLTR Hernandez jrn 040204.wpd

PARKER & COVERT LLP

Orlando Hernandez

April 12, 2004

Page 4

There remains a need for at least one new elementary school in or adjacent to the project area. The estimated 810 new elementary school students from this project cannot be accommodated in portable classrooms at Sierra Lakes Elementary, as suggested in the draft EIR (page 3-87), as the site lacks the ground space and other facilities to accommodate such a large increase in the total number of students on the site. Redrawing school boundaries is likewise not a feasible solution, as all other elementary schools in the District are also at or above capacity.

**3F
cont.**

The District will require payment of its level 2 school facility fees, currently \$5.69 per square foot on residential development, and commercial-industrial fees, currently \$0.34 per square foot, on commercial development in the project.

3G**Mitigation of Traffic Impact on Adjacent Schools**

As noted in the draft EIR, two of the District's schools are or will be located adjacent to the project: Sierra Lakes Elementary at the southeast corner of Summit Avenue and Citrus Avenue; and Summit High School (estimated completion in September 2005) at the southeast corner of Summit Avenue and Lytle Creek Road.

3H

Traffic volumes along Summit Avenue, Citrus Avenue, and Lytle Creek Road are projected to show large increases as a result of the proposed project by 2007 and thereafter. Heavy, fast-moving traffic presents a danger to children going to and from school and having to cross major arterial streets such as Summit Avenue, Citrus Avenue, and Lytle Creek Road. There is no discussion of this issue nor of pedestrian safety in general anywhere in the draft EIR.

Due to traffic volumes on Summit Avenue and Citrus Avenue, both of which would have to be crossed to reach Sierra Lakes Elementary School from any portion of the project, it is inadvisable to have elementary school age children from the project attend Sierra Lakes Elementary. This is a reason why a new elementary school site should be provided north of Summit Avenue.

3I

With respect to the location of Summit High School, the draft EIR should incorporate pedestrian safety mitigation measures including pedestrian crossing signals and marked school crosswalks on Summit Avenue at both Lytle Creek Road and Knox Avenue. Crossing guards should also be provided at these locations during immediate pre-school and after-school hours, when school is in session.

3J

I:\WPFO\40-Finance\CTR Hernandez.jm 040204.wpd

Response to Comment Letter 3, from Parker & Covert on behalf of the Fontana Unified School District

Response 3a: The student generation factors cited by FUSD agree with those used in the DEIR, as shown in Table 3-24 (Students Generated by the Project) on Page 3-87.

However, after issuance of the DEIR, the City found that FUSD's student generation factors are much higher than the actual number of students generated by the Sierra Lakes project, an adjacent existing residential development that is similar in type to what is planned for Citrus Heights North. According to the *School Facility Needs Analysis* prepared for FUSD in March 2004¹ and adopted by FUSD on May 5, 2004, the Sierra Lakes development has generated (per residential unit) 0.26 student in Grades K-5, 0.09 student in Grades 6-8, and 0.30 student in Grades 9-12. If these lower factors were applied to the Citrus Heights North development, the number of projected students would be 319 in Grades K-5, 110 in Grades 6-8, and 147 in Grades 9-12; the total would be 576 students, which is substantially lower than the 1,546 students projected by FUSD.

The Sierra Lakes students-generated factors may be better indicators of the projected number of students that would be generated by Citrus Heights North than are the FUSD generation factors. If so, then the DEIR has actually overestimated the project's number of additional students, and FUSD is overestimating both the project's number of additional students and the associated costs of additional school facilities.

Response 3b: Comment noted.

The City acknowledges that the elementary and middle schools serving the project area are at capacity. However, the City notes that FUSD is planning to accommodate expected growth in its high school population by opening a new high school (Summit High School, immediately adjacent to the project site). This school is scheduled to open in September 2005, so will be available to enroll students from the Citrus Heights North development.

Response 3c: The DEIR acknowledges that the project's estimated 810 elementary students would exceed the capacity of Sierra Lakes Elementary School, and that A.B. Miller High School is near capacity. However, the capacity of A.B. Miller High School is not an issue because Summit High School is scheduled to open in September 2005; Summit will be adjacent to the project and therefore closer than A.B. Miller, and Summit's planned capacity of 2,800 will accommodate the project's estimated 368 high school students.

Response 3d: Comment noted.

The City notes that FUSD's claimed facilities cost per residential unit is not a factor in determining the significance of a project's impact on public schools. California Government Code §65995(e) and (h) and §65996 provide that the authorized school fee (currently \$5.69 per square foot of assessable residential space) is full and complete mitigation of project impacts on public schools, and no further mitigation can be required. Nor is it standard or common practice for project owners to provide any additional payment for a project's impacts on school facilities.

¹ *School Facility Needs Analysis*, prepared for the Fontana Unified School District by Brenda Curtis, School Planning Services, Mission Viejo, CA, March 2004 (Appendix A1 of this FEIR).

Response 3i: Comment noted.

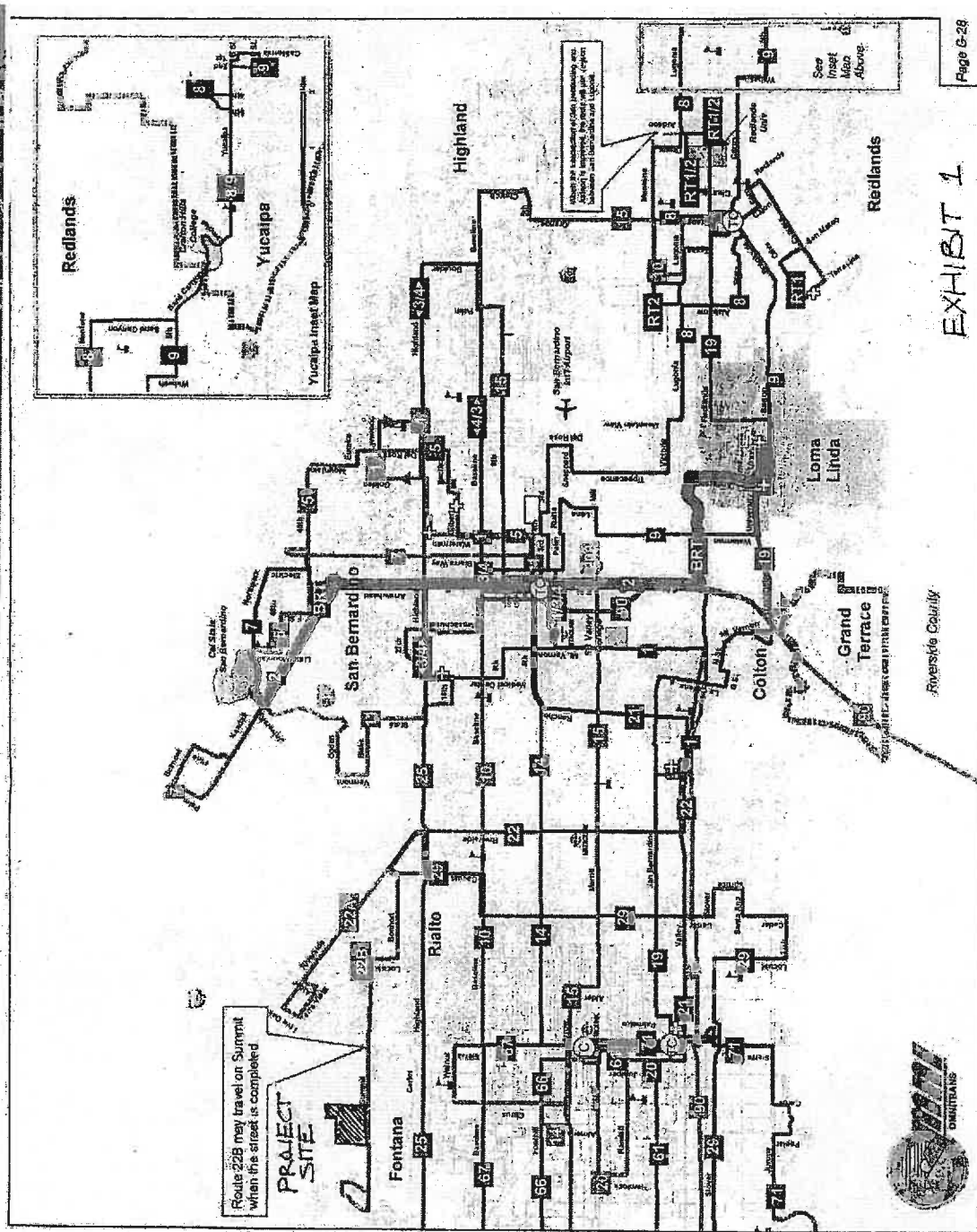
The City agrees that building a new elementary school site north of Summit Avenue would avoid the necessity of elementary students crossing Summit, particularly because the number of students estimated to be generated by the project in itself constitutes a reasonable capacity for an elementary school. However, the responsibility for constructing school facilities and staffing them to meet the needs of new Fontana residents lies with FUSD, not the City or the project developer.

Response 3j: Comment noted. Please see Response 3i.

Response 3k: Comment noted. The FUSD is already on the mailing list to receive future notices of meetings regarding the EIR.

Response to Comment Letter 4, from the California Department of Conservation

Response 4a: Comment noted. If any unrecorded oil, gas, or injection well is discovered during project construction, the Cypress office of the Department of Conservation will be notified.



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Response 6a: Comment noted.

Response 7a: Comment noted.



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San Diego County: Transportation Commission; John Love, Miramar

San Diego County: Transportation Commission; John Love, Miramar

December 17, 2003

Mr. Orlando Hernandez
Senior Planner
Community Development Department
City of Fontana
8353 Sierra Avenue
Fontana, CA 92335

RE: Comments on the Notice of Preparation for a Draft Environmental Impact Report for the Citrus Heights North Specific Plan - SCAG No. I 20030662

Dear Mr. Hernandez:

Thank you for submitting the Notice of Preparation for a Draft Environmental Impact Report for the Citrus Heights North Specific Plan to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the Notice of Preparation, and have determined that the proposed Project is regionally significant per California Environmental Quality Act (CEQA) Guidelines (Section 15206). The proposed Project considers the construction of more than 500 dwelling units. CEQA requires that EIRs discuss any inconsistencies between the proposed project and the applicable general plans and regional plans (Section 15125 [d]). If there are inconsistencies, an explanation and rationalization for such inconsistencies should be provided.

Policies of SCAG's Regional Comprehensive Plan and Guide and Regional Transportation Plan, which may be applicable to your project, are outlined in the attachment. We expect the DEIR to specifically cite the appropriate SCAG policies and address the manner in which the Project is consistent with applicable core policies or supportive of applicable ancillary policies. Please use our policy numbers to refer to them in your DEIR. Also, we would encourage you to use a side-by-side comparison of SCAG policies with a discussion of the consistency or support of the policy with the Proposed Project.

Please provide a minimum of 45 days for SCAG to review the DEIR when this document is available. If you have any questions regarding the attached comments, please contact me at (213) 236-1867. Thank you.

Sincerely,

JEFFREY M. SMITH, AICP
Senior Regional Planner
Intergovernmental Review

December 17, 2003
Mr. Orlando Hernandez
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Fontana	2000	2005	2010	2015	2020	2025
Household	33,088	39,123	42,874	47,058	52,512	63,671

8A
cont.

3.03 *The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL STANDARD OF LIVING

The Growth Management goals to develop urban forms that enable individuals to spend less income on housing cost, that minimize public and private development costs, and that enable firms to be more competitive, strengthen the regional strategic goal to stimulate the regional economy. The evaluation of the proposed project in relation to the following policies would be intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers.

8B

- 3.05 *Encourage patterns of urban development and land use, which reduce costs on infrastructure construction and make better use of existing facilities.*
- 3.09 *Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.*
- 3.10 *Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.*

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL QUALITY OF LIFE

The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

8C

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local land use powers.

3.24 Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.

3.27 Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.

8D
cont.

REGIONAL TRANSPORTATION PLAN

The Regional Transportation Plan (RTP) also has goals, objectives, policies and actions pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. Among the relevant goals, objectives, policies and actions of the RTP are the following:

Core Regional Transportation Plan Policies

4.01 Transportation investments shall be based on SCAG's adopted Regional Performance Indicators:

Mobility - Transportation Systems should meet the public need for improved access, and for safe, comfortable, convenient, faster and economical movements of people and goods.

- *Average Work Trip Travel Time in Minutes – 25 minutes (Auto)*
- *PM Peak Freeway Travel Speed – 45 minutes (Transit)*
- *PM Peak Non-Freeway Travel Speed*
- *Percent of PM Peak Travel in Delay (Fwy)*
- *Percent of PM Peak Travel in Delay (Non-Fwy)*

Accessibility - Transportation system should ensure the ease with which opportunities are reached. Transportation and land use measures should be employed to ensure minimal time and cost.

- *Work Opportunities within 45 Minutes door to door travel time (Mode Neutral)*
- *Average transit access time*

8E

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assessed.

- 5.11* *Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.*

8F
cont.

OPEN SPACE CHAPTER ANCILLARY GOALS

Outdoor Recreation

- 9.01 *Provide adequate land resources to meet the outdoor recreation needs of the present and future residents in the region and to promote tourism in the region.*
- 9.02 *Increase the accessibility to open space lands for outdoor recreation.*
- 9.03 *Promote self-sustaining regional recreation resources and facilities.*

Public Health and Safety

- 9.04 *Maintain open space for adequate protection of lives and properties against natural and man-made hazards.*
- 9.05 *Minimize potentially hazardous developments in hillsides, canyons, areas susceptible to flooding, earthquakes, wildfire and other known hazards, and areas with limited access for emergency equipment.*

8G

Resource Production

- 9.07 *Maintain adequate viable resource production land, particularly lands devoted to commercial agriculture and mining operations.*

Resource Protection

- 9.08 *Develop well-managed viable ecosystems or known habitats of rare, threatened and endangered species, including wetlands.*

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- Ensure environmental justice regardless of race, ethnicity or income class.
- Support local and state fiscal policies that encourage balanced growth
- Encourage civic engagement.

Principle 4: Promote sustainability for future generations

- Preserve rural, agricultural, recreational and environmentally sensitive areas.
- Focus development in urban centers and existing cities.
- Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.
- Utilize "green" development techniques.

8I
cont.

CONCLUSIONS

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA.

8J

Response 8a: CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIESRegarding SCAG Policy 3.01:

During the 1980s, Fontana was one of the fastest growing cities in San Bernardino County. Between 1980 and 1990, the City's population increased 135%, from 37,100 to 87,100.³ Most of this population growth resulted from new residential development that attracted additional persons into the City. Housing also increased substantially; according to the 1990 U.S. Census, during the same decade, the number of housing units in Fontana increased by 106%, reaching 28,800 housing units in 1990.

In the next decade, housing unit growth slowed dramatically, to 29%, the population increased much more rapidly—by 46%..⁴ The need for housing is continuing to grow as a result of this population growth and demolition of existing units. Based on SCAG projections and Department of Finance (DOF) average household size estimates, the City will need 52,512 dwelling by 2020 and 63,371 units by 2025. According to SCAG's Regional Housing Needs Assessment (RHNA) for the City of Fontana, the City is expected to grow to 52,512 dwelling units in 2020 and to 63,671 units by 2025. These projections show that, between 2005 and 2025, the City will need to add 24,548 dwelling units. These new households will need to be accommodated under the buildout of the Land Use Element of the Fontana *General Plan*.

The proposed project would add 1,227 dwelling units. Based on 3.93 persons per household in Fontana,⁵ the project would add approximately 4,822 persons, and increase the City's population by 3.3%.

The proposed project would be consistent with Goal 5.1 of both the City's existing Housing Element⁶ (*Encourage the provision of a wide range of housing by location, type of unit, and price to meet the existing and future needs of Fontana residents.*) and the City's updated Housing Element⁷ (*"A wide range of housing units by location, type of unit and price are provided in our city to meet the existing and future needs of Fontana residents."*).

Because the City's Housing Element is required by State Housing Law to adopt the RHNA numbers established by SCAG in order to provide the City's "fair share" of the regional housing needs, and the proposed project, in turn, is consistent with the City's Housing Element, the EIR for the proposed project is consistent with SCAG's population, housing, and job forecast numbers.

Regarding SCAG Policy 3.03:

As indicated in Section 3.14 (Utilities and Service Systems) of the DEIR, the proposed project will comply with the updated Fontana *General Plan* (October 21, 2003) relating

³ City of Fontana *General Plan*, Housing Element, pg.6.

⁴ City of Fontana *General Plan*, Revised HCD Hearing Draft of Housing Element, Tables 5-4 and 5-7, January 2004.

⁵ California Department of Finance, January 1, 2003.

⁶ City of Fontana *General Plan*, September 2, 1997, Housing Element.

⁷ Although the City's General Plan was updated on October 21, 2003, State approval of the January 2004 draft of the plan's Housing Element is still pending.

QUALITY OF LIFERegarding SCAG Policy 3.12:

The proposed project includes a 9-acre neighborhood commercial center and a community sports center, both of which would be within walking distance for most residents of the development. In addition, Omnitrans plans to extend regular bus service to the project area, which will reduce the number of auto trips.

Regarding SCAG Policy 3.14:

The proposed project includes multifamily dwelling units close to Summit Avenue, which would likely be served by the additional bus routes to be implemented by Omnitrans.

Regarding SCAG Policy 3.17:

The proposed project has a wide range of types of housing, with densities ranging from 3.2 to 15.6 units per acre.

Regarding SCAG Policy 3.18:

The location of the proposed development is restricted to a highly disturbed vacant area with sparse vegetation, no water source, a lack of native species of plants or animals, and no suitable habitat for sensitive species. The site is flat and geologically stable, has no known cultural resources, and poses no known danger from hazardous substances or wastes.

Regarding SCAG Policy 3.19:

Not applicable; the project site is not in a planned open space area.

Regarding SCAG Policy 3.20:

Because the project site is highly disturbed and has no available water resources, it has no sensitive biological resources to be protected. There is no agriculture on the site. The project's conversion of open, vacant land to residential use would increase the area of impervious surfaces, which could reduce the amount of recharge into the groundwater. However, the amount of landscaping provided for the site would offset some of any such loss by impervious surfaces, as would regular irrigation of landscaping by homeowners. The size of the development is approximately 212 acres, so any reduction in groundwater is not expected to be substantial.

Regarding SCAG Policy 3.21:

Based on a cultural resources survey conducted for the project by a certified archaeologist, there are no known cultural resources on the project site and the potential for uncovering cultural resources is low. In the unlikely event that archaeological resources are uncovered during grading and project construction, all activity would be suspended and the materials would be evaluated for potential significance by a qualified archaeologist. A qualified archaeologist would attend a pre-grade meeting and inform construction managers about appropriate procedures to minimize any damage to such uncovered archaeological remains.

Regarding SCAG Policy 3.22:

The project site has a relatively flat topography and is located on an alluvial fan. The relative absence of problematic geologic and soil conditions onsite and in the project

specific impacts on the entire regional transportation system and on regional air quality. However the traffic impact analysis was prepared using forecast traffic data obtained from SCAG's Comprehensive Transportation Plan (CTP) traffic model. Therefore, the proposed project is in conformance with SCAG's Regional Performance Indicators to the extent that the CTP model's socioeconomic data and resulting traffic forecasts are in conformance with the same.

Regarding SCAG Policy 4.16:

The City of Fontana and the San Bernardino County Associated Governments (SANBAG) agree with this policy.

Response 8f: AIR QUALITY CHAPTER CORE ACTIONS

Regarding SCAG Policy 5.07:

The proposed project includes high-speed digital telecommunications lines into all dwelling units, which would enhance opportunities for them to work and study at home (telecommute), thus reducing vehicle trips.

In addition, the project would comply with the following policies relating to Public Transit in the Circulation Element of the City *General Plan*.

Policy 4.2.2: Continue to support the regional bus system to provide intra-city service, inter-city service to major employment centers, and connection to other regional transportation transfer points.

Policy 4.3.4: Continue to Coordinate transit planning with the Southern California Association of Governments (SCAG), the San Bernardino Associated Governments (SANBAG), the Los Angeles County Metropolitan Transportation Authority (MTA), the Southern California Regional Rail Authority (Metrolink), Omnitrans and adjacent communities.

Regarding SCAG Policy 5.11:

The Citrus Heights North Specific Plan EIR incorporates consideration of all applicable local, subregional, and regional plans regarding air quality, land use, and transportation, and is consistent with them.

Response 8g: OPEN SPACE CHAPTER ANCILLARY GOALS

Regarding SCAG Policy 9.01:

The proposed project would not remove any existing park facilities, either on or adjacent to the site. However, the addition of project residents would generally increase the demand for and use of existing parks and other recreational facilities in the area, both local and regional. The Citrus Heights North Specific Plan would provide residents with several recreation facilities: pocket parks, open spaces with a dual purpose of recreation and drainage control, and private parks with amenities such as playgrounds and swimming pools. In addition, the project would provide a community sports center that would be open to the general public as well as to residents.

The project would mitigate impacts on local park and recreation facilities by paying a City fee, charged per dwelling unit. Impacts on regional parks would be offset by the additional property taxes that would be paid by the project's property owners. The City fee and property tax would provide land resources consistent with SCAG policy.

into account traffic projections up to 2025. The proposed project places new housing and a neighborhood shopping center contiguous to other existing or planned residential developments, and is within a few miles of the commercial and industrial areas that provide most of the jobs in Fontana. The project would also be served by an Omnitrans bus route, giving residents an option to making auto trips.

Regarding SCAG Principle 2 (Livability):

The proposed project includes a broad range of housing—from single-family homes on 10,000-square-foot lots to multifamily dwelling units with densities as high as 15.6 units per acre. With its 9-acre neighborhood shopping center (immediately adjacent to the residential area) and various recreational amenities, the project puts its residents within walking distance of shops, parks, passive open space, a community sports center, other recreational facilities, and a high school (scheduled to open in the fall of 2005).

Regarding SCAG Principle 3 (Prosperity):

The proposed project would provide a wide variety of housing types by incorporating both single-family and multifamily dwelling units, at densities ranging from 3.2 to 15.6 units per acre, so would be accessible to families at many income levels. The potential environmental impacts of the project would not discriminate disproportionately against a racial or ethnic group or an income class. The project also is consistent with the City's overall growth plan to build out northern Fontana.

Regarding SCAG Principle 4 (Sustainability):

The proposed project site has no agricultural, recreational, or environmentally sensitive areas to be sustained. However, the project would fulfill the SCAG strategy of focusing development in existing cities, and its incorporation of a neighborhood shopping center would reduce air pollution by encouraging residents to walk rather than drive when doing local errands.

Response 8j: CONCLUSIONS

The proposed project is consistent with SCAG's goal of using all feasible measures needed to mitigate any potentially negative regional impacts, in accordance with CEQA.

APPENDIX A SCHOOL FACILITIES ANALYSES

Appendix A1

**SCHOOL FACILITIES NEEDS ANALYSIS
prepared for the Fontana Unified School District
by School Planning services
(March 2004)**

SCHOOL PLANNING SERVICES

Demographic Needs Assessments

Enrollment Forecasts

Development Impact Analyses

SCHOOL FACILITY NEEDS ANALYSIS

Prepared for:

Fontana Unified School District

March 2004

Prepared by:

Brenda Curtis

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INTRODUCTION

The passage in November 1998 of Proposition 1A by the California electorate has altered the methods of financing school construction in the State of California in a manner unparalleled since the 1986 School Facilities Act, drastically modifying the ability of school districts to mitigate the impact of new residential development on their facilities. The bond passage, by triggering those provisions of SB-50 which had not already become law by virtue of the Governor's signature, not only appears to preclude the so-called "full mitigation" of the impact of development which was available conditionally to school districts under the umbrella of the *Mira/Hart/Murietta* decisions, but also strictly limits the amount of fees which may be collected and defines in some detail the procedures required of districts to implement fee collections.

The rules and law underlying the collection of the basic statutory fees based on Government Code §65995 and Education Code §17620, currently \$2.24 per square foot for residential construction and \$0.36 for commercial/industrial and senior housing, are relatively unchanged; it is now common practice to refer to the statutory fees for residential construction as Level 1 Fees.

In addition to Level 1 Fees, two alternative fees are provided for under certain specified conditions:

Government Code §65995.5 allows for the imposition of fees on residential construction under prescribed conditions; such fees may be referred to as alternative or Level 2 Fees. Level 2 fees are purported to represent 50% of the cost of the school facilities necessitated by new residential development, and are based on a State-determined per pupil grant plus 50% of the costs associated with site acquisition and development. (In reality, the costs allowed under the legislation may not equal the actual costs of the construction of new facilities.) The State will then grant a like amount of funding, i.e., also equal to 50%, with the district required to certify that the combined funds are adequate for the completion of

The purpose of this study, then, is to address the District's eligibility under the SFP, and present the School Facilities Needs Analysis according to the specifications of Government Code §65995.6.

Estimation of New Residential Square Footage - A review of more than 1,700 units which received Certificates of Compliance from the District during the past five years revealed that the average square footage was 1,967. Additionally, information was collected from the Fontana Planning Department and the internet indicating that the average square footage for the planned Citrus Heights development will equal approximately 3,214 square feet. Multiplying both of these average square footages by the respective anticipated number of units results in a projection of a total of 9,044,138 square feet of unmitigated residential construction over the next five years.

STUDENT GENERATION FACTORS

As required by Government Code Section 65995.6, student generation factors were determined by first developing two address databases of all the new housing constructed in the District within the past five years, both those outside of Sierra Lakes and those from the mitigated Sierra Lakes project. These addresses were then matched to the addresses of enrolled students.

It was found that 1,845 District students lived in the 1,638 new households outside of Sierra Lakes which were identified by address; this results in a K-12 student generation factor ("SGF") for these homes of 1.13. A similar analysis of the new homes built in Sierra Lakes revealed a total of 429 students in 935 houses, for a K-12 SGF of 0.46.

PROJECTION OF UNHOUSED STUDENTS

Projected Students from New Housing - In total, the 4,293 forecast units should produce an additional 4,516 students, based on current student generation data for recently constructed homes in the District.

Estimated Number of Schools Required by Unmitigated New Development - Using the District's standards, the projected number of unhoused students was converted to the number of schools required to adequately house the projected students. It is found that there will be a need for 3.7 K-6 schools, 50% of a 7-8 middle school, and 50% of a new high school to house the students anticipated from *unmitigated* new residential construction.

Site Acquisition Costs - The combined site acquisition costs (unadjusted for inflation) for students from unmitigated new construction equal \$15.6 million.

Site Development Costs - The total estimated site development costs (also unadjusted for inflation) are approximately \$7.9 million to house students from unmitigated new construction within the next five years.

Allowable Site-related Costs - Per Section 65995.5, half of the estimated site acquisition costs and the site development costs for the projects required to house the students from unmitigated new construction may be claimed as additional grants – these allowable costs, then, equal \$11.8 million.

FEE CALCULATIONS - LEVEL 2

Total Grant Amount - Level 2 Fees are available to qualifying districts while the State has funds for new facility construction, and are based on the combination of the construction grant amounts and 50% of the site acquisition and development costs, a formula designed to represent approximately half of the required facilities costs. Based on these State guidelines, FUSD's Level 2 costs from new construction without mitigation will approximate \$41,900,972 within the next five years.

ELIGIBILITY REQUIREMENTS

In order to impose Level 2 or Level 3 fees, districts must meet the following requirements as specified in Section 65995.5:

Timely Application:

Fontana Unified School District has made a timely application to the State Allocation Board for new construction funding and has been determined to have met the eligibility requirements for such funding.

Satisfaction of Cost-Related Requirements

After January 1, 2000, districts must meet two of the four options listed below:

- 1) The district has "a substantial enrollment of its elementary school pupils on a multitrack year-round schedule."
- 2) The district has placed a general obligation bond on the ballot to finance school facilities within the preceding four years which received more than fifty percent of the votes cast.
- 3) The district has issued debt or incurred obligations for capital outlay in an amount equal to 15 percent of its bonding capacity if the debt does not include landowner-voted special taxes pursuant to the Mello-Roos Community Facilities Act of 1982 approved after November 4, 1998. If such special taxes are included in the debt

NEEDS ANALYSIS

EXISTING AND PROSPECTIVE HOUSING

In order to gauge the potential number of new homes to be constructed within Fontana Unified School District within the next five years, household¹ projections which had been produced by the Southern California Association of Governments were analyzed in conjunction with the 2000 Census count of households in the District area. Projections inherently require assumptions about current as well as future conditions, and consequently vary from agency to agency depending upon the methodologies and assumptions which are employed by that particular agency. SCAG is the Regional Planning Authority and one of the traditional sources for population and household projections.

Generally speaking, most local jurisdictions default to the projections of SCAG, because SCAG invites the cities and counties in its territory to participate in the development of the projections; therefore, input from the local planning departments is a major component of SCAG's projections. This study utilizes SCAG's most recent update which was based on the California Department of Finance's 1997 population and housing estimates.

In order to reflect the more recent conditions in the District, the rates of growth projected by SCAG for the various Census tracts were applied to the household counts from the 2000 Census, producing projections for the years 2005 and 2010.

Fontana USD, like most school districts, includes within its boundaries parts of several other jurisdictions, including both municipalities and unincorporated or County areas. Specifically, FUSD

¹ It is duly noted that housing units and households (or occupied housing units) are different statistical and actual entities; in this case however, the difference is irrelevant as long as the same characteristic is utilized consistently throughout the analysis.

Table 1
OCCUPIED HOUSING ESTIMATES BY CENSUS TRACTS AND PARTS THEREOF
2000 - 2010
Fontana Unified School District

Area of District	Census Tract	2000	2005	2010
Fontana	2010*	270	299	320
	2202*	6	8	10
	2301*	1,460	1,722	1,938
	2302*	1,075	1,268	1,427
	2303*	2,407	2,839	3,195
	2402*	483	532	617
	2502*	720	818	941
	2601*	479	553	629
	2602	1,917	2,211	2,519
	2603*	2,071	2,389	2,721
	2701*	101	247	319
	2800	3,363	3,635	4,009
	2901	1,121	1,249	1,419
	2902	1,750	1,950	2,215
	3000	690	869	1,109
	3100	2,453	2,649	2,913
	3200	2,045	2,184	2,375
	3300*	1,145	1,261	1,392
	3401*	838	1,066	1,244
	3402*	441	561	655
		24,835	28,310	31,967

By 2005, the Fontana area of the District is forecast to add approximately 3,475 new homes to its 2000 estimate of 24,835 households (at the rate of 695 per year on average), with an additional 3,657 homes scheduled for the following five years at an average of 731 per year. The compounded rate of household growth in the Fontana area, projected to be 2.7% per year for the period of 2000 to 2005, is now forecast by SCAG to drop marginally to 2.5% per year after 2005.

Table 2
ANALYSIS OF SCAG'S PROJECTED CHANGE IN HOUSEHOLDS
2000 - 2010
Fontana Unified School District

Areas within FUSD	2000 - 2005			2005 - 2010		
	Total Projected Change	Average Annual Change and Rate of Change		Total Projected Change	Average Annual Change and Rate of Change	
Fontana	3,475	695	2.7%	3,657	731	2.5%
San Bernardino County	1,454	291	3.3%	1,670	334	3.2%
Rialto	602	120	4.1%	468	94	2.7%
Rancho Cucamonga	14	3	6.8%	5	1	1.9%
Total	5,545	1,109	2.9%	5,800	1,160	2.7%

Source: SCAG, 2003; School Planning Services, 2004

Table 3
SUMMARY OF SCAG'S HOUSEHOLD ESTIMATES AND PROJECTIONS
Fontana Unified School District
2000 - 2010

Areas within FUSD	2000 Estimate	Share of Total	2005 Projection	Share of Total	2010 Projection	Share of Total
Fontana	24,835	69%	28,310	69%	31,967	68%
San Bernardino County	8,220	23%	9,674	23%	11,344	24%
Rialto	2,709	8%	3,311	8%	3,779	8%
Rancho Cucamonga	36	0%	50	0%	55	0%
Total	35,764	100%	41,295	100%	47,090	100%

Source: SCAG, 2000; School Planning Services, 2004

Analysis of SCAG Data

Rather than accepting SCAG's projections at face value, it is instructive to compare SCAG's projected rate of household growth to the estimated rate of growth derived from comparison of the 2000 census count and the DOF's most recent estimate of households for the entire City of Fontana. (Because of the very small proportion of total unincorporated area and Rialto City area in the District, data for these areas would not be representative of FUSD.)

Table 5 FIVE-YEAR HOUSEHOLD ESTIMATE Fontana Unified School District			
	2000	2005	2010
FUSD Households	35,764	41,295	47,090
Prorata Estimate - 2004 - 2009		5,689	
Source: SCAG; School Planning Services, 2004			

Tentative and Approved Plans

The adjusted numbers presented above were further validated by an examination of current approved specific and tentative plans and future plans known to the District, which identified more than 4,400 planned residential units.

Adjustment for Mitigated Units

The District has established either a Community Facilities District or a Mitigation Agreement with several developers who are constructing homes within the District and who collectively anticipate building approximately 1,396 units within the next five years. It is necessary, therefore, to reduce the total number of projected new residential units projected by 1,396 to reflect the existing mitigation for these particular units (Table 6).

Type of Housing - New Construction

To further support a meaningful forecast of the volume and the type of housing which is planned for the District in the next five years, five years of recent published building permit activity in the City of Fontana was investigated.¹ In reviewing the City's building permit data, it was found that

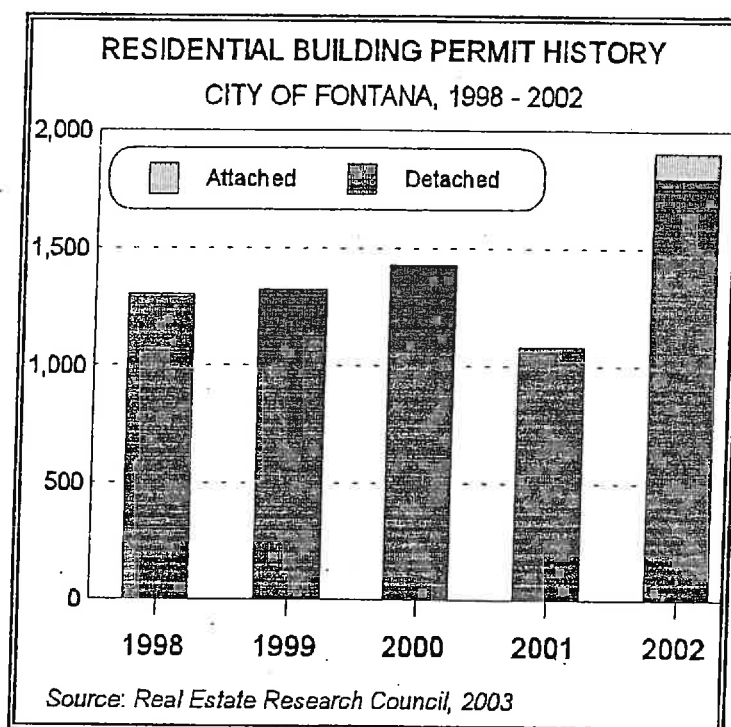


Figure 1

2002 had substantially more residential activity than the four preceding years, with total permits in 2002 registering at just over 1900 compared to levels of 1,400 or less in 1998 through 2001 (Figure 1). It is also noted that, for the first time in recent history, a small percentage of Fontana permits were for attached housing, which in this instance were for designated for seniors and

¹ It is again noted that most, but not all, of the City of Fontana is located in FUSD.

Table 7
PROJECTED UNMITIGATED NEW RESIDENTIAL CONSTRUCTION
BY SQUARE FOOTAGE
2004 - 2009

	Estimated Unmitigated New Units - Five Years	Average Square Footage	Total Estimated Square Footage
Citrus Heights	481	3,214	1,545,934
Other	3,812	1,967	7,498,204
	4,293		9,044,138

Source: SCAG; DOF; FUSD; Fontana Planning Dept.; School Planning Services, 2004

Table 8
STUDENT GENERATION FACTORS
FROM NEW HOUSING EXCLUDING SIERRA LAKES
DERIVED BY ADDRESS MATCHING
Fontana Unified School District
2003/2004

Grade Group	Housing Units	Student Count	SGF
K-5	1,638	939	0.57
6-8	1,638	443	0.27
9-12	1,638	463	0.28
K-12	1,638	1,845	1.13

Source: FUSD; School Planning Services, 2003/04

Table 9
STUDENT GENERATION FACTORS
FROM SIERRA LAKES DERIVED BY ADDRESS MATCHING
Fontana Unified School District
2003/2004

Grade Group	Housing Units	Student Count	SGF
K-5	935	240	0.26
6-8	935	81	0.09
9-12	935	108	0.12
K-12	935	429	0.46

Source: FUSD; School Planning Services, 2003/04

The K-6 student generation factor for Sierra Lakes computes to 0.28, with the 7-8 SGF 0.06; the high school rate is 0.12 (Table 11).

Table 11
STUDENT GENERATION FACTORS
FROM SIERRA LAKES DERIVED BY ADDRESS MATCHING
Fontana Unified School District
2003/2004

Grade Group	Housing Units	Student Count	SGF
K-6	935	264	0.28
7-8	935	57	0.06
9-12	935	108	0.12
K-12	935	429	0.46

Source: FUSD; School Planning Services, 2003/04

Table 12
PROJECTED STUDENTS FROM UNMITIGATED NEW HOUSING -
FIVE YEARS
Fontana Unified School District

	Projected Number of Unmitigated Households	Student Generation Factors from New Homes	Projected Number of Students
Citrus Heights			
K-6	481	0.28	136
7-8	481	0.06	29
9-12	481	0.12	56
K-12	481	0.46	221
Other			
K-6	3,812	0.67	2,551
7-8	3,812	0.17	666
9-12	3,812	0.28	1,078
K-12	3,812	1.13	4,295
TOTAL			
K-6	4,293		2,686
7-8	4,293		695
9-12	4,293		1,133
K-12	4,293		4,516
Source: FUSD; SCAG; Census; School Planning Services, 2003			

Existing Facilities Need

Based on District standards and CDE guidelines for school size which are detailed subsequently in the narrative, the existing need of the District has been converted to "Equivalent Schools" and "Equivalent Classrooms" ("CRs") in Table 14, revealing a **current** need for approximately 7.2 elementary schools, 1.2 middle schools, 70% of a high school, and 71 SDC classrooms.

Table 14 EXISTING FACILITIES NEED BY GRADE GROUP Fontana Unified School District 2004			
Grades	Current Capacity Shortfall	Standard School Size	Equivalent Schools Needed
K-6	5,253	733	7.2
7-8	1,728	1,400	1.2
9-12	1,818	2,500	0.7
		Standard Classroom	Equivalent CRs Needed
SDC	926	13	71
Source: FUSD; School Planning Services, 2004			

Government Code §65995.6 requires the District to "identify and consider the extent to which projected enrollment growth may be accommodated by excess capacity in existing facilities." Since there is no excess capacity in existing facilities, this requirement is moot.

NEW CONSTRUCTION GRANTS

As previously referenced, the School Facilities Program provides a grant amount based on the number of unhoused pupils per grade group anticipated from new residential construction. The grant amounts per unhoused pupil as of January 2004 are as follows:

1)	Elementary School Pupils	\$6,040
2)	Middle School Pupils	\$6,388
3)	High School Pupils	\$8,363

These figures will be adjusted annually by the State Allocation Board ("SAB") to reflect changes in construction costs, and it is the intention of the District to collect the maximum fee available to it.

In order to determine the total amount of the new construction grant, the per-unhoused pupil grant must be multiplied by the anticipated number of unhoused pupils projected to be generated by unmitigated new residential construction after allocation of current available space (Table 16).

Table 16 indicates that the new construction grant amount for K-6 students is \$16,226,182; for middle schools, the total is \$4,439,087, while the grant amount at the high school level computes to \$9,475,279. The grand total then equals \$30,140,548.

SITE ACQUISITION AND DEVELOPMENT COSTS

In addition to the new construction grants, the School Facilities Program also allows school districts to request funding assistance for site acquisition and site development subject to statutory requirements. To determine the appropriate costs, the acreage required for each school type, i.e., elementary, middle, and high school, is calculated based on both the district's educational policy regarding the number of students to be served at an individual school and the site size guidelines developed by the California Department of Education ("CDE") and published under the title "School Site Analysis and Development".

Site Size Standards

Base on the current CDE guidelines and District standards, then, FUSD's site size requirements are presented in Table 17 below. Specifically, for an elementary school with 733 students, the

Table 17 SUMMARY OF DISTRICT SITE STANDARDS Fontana Unified School District		
School Type	Optimal Number of Students	Recommended Site Size (acres)
Elementary	733	12.6
Middle	1,400	25.0
High	2,500	40.0
Source: FUSD; CDE "School Site Analysis and Development"; School Planning Services		

Estimated Number of Schools Required by Unmitigated New Development

Using the District's standards, the projected number of unhoused students anticipated from unmitigated new construction has been converted to the number of schools that will be required, and it has been found that there will be a need for 3.7 K-6 schools (based on housing 733 students per school), 50% of a 7-8 middle school, and 50% of a new high school (Table 19).

Table 19 ESTIMATED NUMBER OF SCHOOLS REQUIRED BY UNMITIGATED NEW DEVELOPMENT WITHIN FIVE YEARS Fontana Unified School District			
	Optimal Number of Students per School	Projected Number of Unhoused Students from New Construction	Number of Schools Required
Elementary - K-6	733	2,686	3.7
Middle - 7-8	1,400	695	0.5
High - 9-12	2,500	1,133	0.5

Source: FUSD; School Planning Services, 2004

Site Development Costs - Unmitigated New Construction

The site development costs for each of the three types of schools as estimated by the District based on State approvals are shown below in Table 21; in each case, the costs have been factored by the number of sites needed to house the students expected from unmitigated new construction. The total estimated site development costs to house these students over the next five years are approximately \$7.9 million.

Table 21 ESTIMATED SITE DEVELOPMENT COSTS FOR STUDENTS FROM UNMITIGATED NEW CONSTRUCTION Fontana Unified School District			
	Number of School Sites Required	Estimated Development Cost per Site	Total Estimated Site Development Cost
K-6 Elementary School	3.7	\$1,200,000	\$4,398,015
7-8 Middle School	0.5	\$1,761,940	\$874,564
High School	0.5	\$5,889,732	\$2,669,227
TOTAL			\$7,941,806
Note: The number of school sites has been taken from Table 19 and has not been rounded for purposes of the cost calculation.			
Source: FUSD; HMC Architects; LPA; School Planning Services, 2004			

LEVEL 2 FEE CALCULATIONS

Total Grant Amount

Level 2 Fees are available to qualifying districts while the State has funds for new facility construction, and are based on the combination of the construction grant amounts as derived in Table 16 and 50% of the site acquisition and development costs as developed in Tables 18 through 22. In combination, then, these figures are designed to represent approximately half of the required facilities costs. Based on these State formulae, FUSD's Level 2 costs from new construction without mitigation will equal approximate \$41,900,972 within the next five years (Table 23).

Table 23 MAXIMUM GRANT AMOUNTS BASED ON CONSTRUCTION GRANTS AND DEVELOPMENT COSTS FOR STUDENTS FROM UNMITIGATED NEW CONSTRUCTION Fontana Unified School District			
	Total Construction Grants	Allowable Site Costs	Total
Elementary School	\$16,226,182	\$6,637,201	\$22,863,384
Middle School	\$4,439,087	\$1,794,529	\$6,233,616
High School	\$9,475,279	\$3,328,693	\$12,803,972
TOTAL	\$30,140,548	\$11,760,423	\$41,900,972
Source: FUSD; HMC Architects; LPA; School Planning Services, 2004			

Fee per Square Foot of New Residential Construction

In Table 7, it was shown that FUSD can anticipate a total of 9,044,138 square feet of new residential construction within the next five years for which there is no mitigation. In Table 24, the total grant amount is divided by the total anticipated square footage, resulting in an average Level 2 Fee per square foot of new construction.

Table 24 CALCULATION OF LEVEL 2 FEES Fontana Unified School District 2004			
A	Total Construction Grants	\$30,140,548	
B	Allowable Site Costs	\$11,760,423	
C	Total Allowable Fees (A+B)	\$41,900,972	
D	Estimated Total Residential Square Footage w/o Mitigation (5 Yrs.)		9,044,138
	Level 2 Fee per Square Foot (C/D)		\$4.63
Source: FUSD; School Planning Services, 2004			

The Level 2 Fee which can be adopted by the District computes to \$4.63 per square foot of new residential construction.

FINDINGS

Based on the foregoing analysis, the following findings are appropriate:

1. That the purpose of the fee has been adequately identified, i.e., to assist in providing adequate school housing for District students generated by new unmitigated residential development;
2. That the facilities to be constructed have been adequately identified;
3. That the amount of fees to be paid by new residential development in the District is reasonably related to the needs of the community for school facilities generated by that development, and does not exceed that development's share of the cost of the facilities;
4. That the District has met the statutory requirements which entitle it to collect Level 2 Fees at the rate of \$4.63 per square foot from new unmitigated residential development and to collect Level 3 Fees at the rate of \$9.27 when the conditions pertaining to Level 3 Fees are applicable.

APPENDIX

Fontana Unified
Assessed Valuations Debt Worksheet
June 30, 2002

Total District Tax Roll Value	\$ 6,055,155,795.00
Limited percent 2.5%	\$ 151,378,894.88
Outstand Debt 6-30-02	\$ 98,101,059.00
Percent of Debt	64.80%

ENROLLMENT CERTIFICATION/PROJECTION

SAB 50-01 (Rev. 01/03) Excel (Rev. 2/27/2003)

SCHOOL DISTRICT

FONTANA UNIFIED

COUNTY

SAN BERNARDINO

FIVE DIGIT DISTRICT CODE NUMBER (see California Public School Directory)

67710

HIGH SCHOOL ATTENDANCE AREA (HSAA) OR SUPER HSAA (if applicable)

Part A. Enrollment Data - (districts or county
superintendent of schools)

Grade	3rd Previous 2000/01	2nd Previous 2001/02	Previous 2002/03	Current 2003/04
K	2,962	2,926	2,968	3,183
1	3,196	3,362	3,282	3,379
2	3,093	3,215	3,318	3,218
3	3,170	3,172	3,288	3,371
4	3,148	3,222	3,260	3,346
5	3,077	3,175	3,210	3,316
6	2,838	3,152	3,205	3,252
7	2,818	2,873	3,205	3,217
8	2,582	2,783	2,825	3,101
9	2,435	2,570	2,779	2,877
10	2,362	2,433	2,512	2,887
11	2,087	2,127	2,272	2,295
12	1,570	1,738	1,803	1,930
TOTAL	35,447	36,828	38,027	39,182

Part B. Pupils Attending Schools Chartered By Another District

3rd Previous	2nd Previous	Previous	Current

Part C. Continuation High School - (districts only)

Grade	3rd Previous	2nd Previous	Previous	Current
9	97	118	131	139
10	212	309	256	257
11	270	303	254	259
12	150	149	137	122

Part D. Special Day Class Pupils - (districts or county
superintendent of schools)

Elementary	Non-Severe	Severe	Secondary	Non-Severe	Severe
MR	34	62	MR	20	87
HH	1	11	HH	2	5
DEAF		4	DEAF		
HI			HI		
SLI	24		SLI	9	
VI	1	8	VI		3
SED	2	19	SED	4	38
OI	2	51	OI	2	25
OH	12	3	OH	6	
SLD	309		SLD	598	4
DB			DB		
MH	5	12	MH	2	11
AUT	11	15	AUT	3	11
TBI		2	TBI	3	2
TOTAL	401	187	TOTAL	849	186

Part E. Special Day Class Enrollment - (county
superintendent of schools only)

3rd Previous	2nd Previous	Previous	Current

Part F. Number of New Dwelling Units

2544

Part G. District Student Yield Factor

1.260

Part H. Five Year Projected Enrollment - School Facility Program
Projections - (except special day class pupils only)

K-6	7-8	9-12	TOTAL
27,436	7,467	13,426	48,329

Projections - special day class pupils only

Elementary	Non-Severe	Severe	Secondary	Non-Severe	Severe
MR	39	72	MR	23	102
HH	1	13	HH	2	6
DEAF		5	DEAF		
HI			HI		
SLI	28		SLI	11	
VI	1	9	VI		4
SED	2	22	SED	5	44
OI	2	59	OI	2	29
OH	14	3	OH	7	
SLD	357		SLD	689	5
DB			DB		
MH	6	14	MH	2	13
AUT	13	17	AUT	4	13
TBI		2	TBI	4	2
TOTAL	483	216	TOTAL	759	218

Part I

One Year Projected Enrollment - State Relocatable Program
Projections - (except special day class pupils only)

K-6	7-8	9-12	TOTAL
23,687	6,422	11,124	41,233

Projections - (special day class pupils only)
(includes Severe & Non-Severe)

Elementary	Secondary	Elementary	Secondary
MR	99	MR	54
HH	12	HH	15
DEAF	4	DEAF	317
HI		HI	
SLI	25	SLI	17
VI	9	VI	26
SED	22	SED	2
TOTAL	602	TOTAL	884

I certify, as the District Representative, that the information reported on this form is true and correct and that:
I am designated as an authorized district representative by the governing board of the district.

If the district is requesting an augmentation in the enrollment projection pursuant to Regulation Section 1859.42 (b), the local planning commission or approval authority has approved the tentative subdivision map used for augmentation of the enrollment and the district has identified dwelling units in that map to be contracted. All subdivision maps used for augmentation of enrollment are available at the district for review by the Office of Public School Construction (OPSC). This form is an exact duplicate (verbatim) of the form provided by the Office of Public School Construction.

In the event a conflict should exist, then the language in the OPSC form will prevail.

SIGNATURE OF DISTRICT REPRESENTATIVE

Pete Delito

DATE

12/18/03

Appendix A2

**STUDENT GENERATION FACTORS
AND DISTRICT FUNDING RESOURCES**

**by Jeanette C. Justus
(April 29, 2004)**

**Draft EIR for The Citrus Heights North Specific Plan
Response to the Fontana Unified School District letter sent April 12, 2004 by Parker
and Covert**

Anticipated Student Generation

Fontana Unified School District recently retained School Planning Services to prepare an updated School Facilities Needs Analysis (SFNA), dated March 2004. The SFNA determined the following student generation rates:

All New Housing Student Generation Factors

K-5	0.54
6-8	0.27
<u>9-12</u>	<u>0.28</u>
K-12	1.13

Sierra Lakes (Project similar to Citrus Heights) Student Generation Factors

K-5	0.26
6-8	0.09
<u>9-12</u>	<u>0.12</u>
K-12	0.46

School Planning Services did not analyze Student generation by product type; that is, the units, whether they are single family detached, condominiums or apartments are not differentiated from each other. Typically, new attached product---condominiums, townhomes, apartments, etc. have lower student generation rates than detached residential units. Therefore, School Planning Services Student Generation Factors will result in a student projection exaggerating the number of students when applied to projects with attached units, like Citrus Heights.

Assuming the New Housing Student Generation Factors, the Project will generate 663 elementary students, 331 middle school students and 344 high school students. Since 35 percent of the units are attached, this can be assumed to be an exaggerated number of students using the New Housing Student Generation Factors.

The more likely numbers of students can be estimated using the Sierra Lakes Student Generation Factors. Sierra Lakes is a new community in the District similar to the proposed Citrus Heights. Using the Sierra Lakes Student Generation Factors, 319 elementary students, 110 middle school students and 147 high school students are projected.

Additional Resources

Parker and Covert fail to mention the amount of state funding resources the District has to construct new capacity in the District. Below is a list of Fontana school construction projects with the amount of apportionment and date funded. The total amount of funding available to the district since 2002 to construct school facilities is over \$160 million.

Additional New Construction Projects funded out of Proposition 47
Data from State Allocation Board

County	District	Application No.	Apportionment	Date Funded
San Bernardino	Fontana Unified	50/67710-00-007	50,589,386	07/02/03
San Bernardino	Fontana Unified	50/67710-00-007	233,242	08/27/03
San Bernardino	Fontana Unified	50/67710-00-009	68,604	08/27/03
San Bernardino	Fontana Unified	50/67710-00-016	16,000	08/27/03
San Bernardino	Fontana Unified	50/67710-00-017	16,000	08/27/03
San Bernardino	Fontana Unified	50/67710-00-018	16,000	08/27/03
San Bernardino	Fontana Unified	50/67710-00-019	16,000	08/27/03
San Bernardino	Fontana Unified	50/67710-00-020	16,000	08/27/03
San Bernardino	Fontana Unified	50/67710-00-021	35,018	08/27/03
San Bernardino	Fontana Unified	50/67710-00-022	29,042	08/27/03
San Bernardino	Fontana Unified	50/67710-00-023	24,230	08/27/03
San Bernardino	Fontana Unified	50/67710-00-024	24,516	08/27/03
San Bernardino	Fontana Unified	50/67710-00-025	19,418	08/27/03
San Bernardino	Fontana Unified	50/67710-00-026	364,188	01/28/04
San Bernardino	Fontana Unified	50/67710-00-029	1,238,808	01/28/04
San Bernardino	Fontana Unified	50/67710-00-031	3,888,540	01/28/04
San Bernardino	Fontana Unified	50/67710-00-032	1,892,356	07/23/03
San Bernardino	Fontana Unified	50/67710-00-033	1,892,356	07/23/03
San Bernardino	Fontana Unified	50/67710-00-034	1,892,356	07/23/03
San Bernardino	Fontana Unified	50/67710-00-035	1,022,040	10/22/03
San Bernardino	Fontana Unified	50/67710-00-036	368,950	01/28/04

Total: \$63,663,050

FONTANA UNIFIED SCHOOL DISTRICT TOTAL:
\$166,475,327