

The Economics of Land Use



Report

2022-23 Analysis and Regional Comparison of Development Impact Fees in Western Riverside County

Prepared for:

Western Riverside Council of Governments (WRCOG)

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January 9, 2023

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1. Introduction and Findings

The Western Riverside Council of Governments (WRCOG) commissioned this Report to provide increased regional understanding of development impact fees on new development in Western Riverside County. More specifically, the purpose of this report is to: (1) indicate the types and relative scale of the development impact fees placed on different land uses within WRCOG member jurisdictions, and (2) indicate the level of fees relative to overall development costs in Western Riverside County. The report is also intended to provide helpful background information on the impact of the regional Transportation Uniform Mitigation Fee (TUMF) by placing the TUMF in the context of the broader development impact fee composition, overall development costs, and other regional dynamics.

This report (the 2022-23 Study) represents an update to the 2018-19 Study, which provided similar information on development impact fees and development costs. Information in this report is primarily based fee schedules and development cost estimates from 2022, while the prior study was primarily on schedules and estimates from 2018.

This report recognizes that there are substantive and ongoing debates about the appropriate levels of development impact fees in regions throughout California and elsewhere in the United States. On the one hand, development impact fees provide revenue to support the construction of critical infrastructure and capital facilities (or in-kind capital facility development) that can generate development value, economic development, and quality of life benefits. On the other hand, these fees act as an additional development cost that can influence development feasibility and potentially impact the pace of new development. **Each fee-adopting jurisdiction must weigh the costs and benefits of potential new or increased fee levels in the context of their goals, capital improvement needs, and economic and development dynamics.**

This report considers development impact fees defined as one-time fees collected for the purposes of funding infrastructure and capital facilities.¹ Reflecting the broad range of land use and development projects in Western Riverside County, prototype development projects for single-family, multifamily, retail, Class A/B office, and large industrial use types were all selected to support comparisons of fees in different jurisdictions.

A summary of key findings is provided below, followed by a description of the organization of this report.

¹ As used in this report and discussed further below, the phrase “development impact fee” includes all fees adopted pursuant to the Mitigation Fee Act and other monetary exactions due at the time of development. The term “fee,” as used in this report, means “development impact fee.”

Summary of Findings

FINDING #1: New development in Western Riverside County pay a wide range of one-time infrastructure/capital facilities associated fees with different public agencies.

New development in Western Riverside County is required to pay development impact fees to help fund:

- Water and Sewer Facilities
- School Facilities
- Regional Transportation Infrastructure
- Additional Local Infrastructure/Capital Facilities (local transportation, parks and recreation, public facility, community/civic facilities, and storm drain infrastructure).
- Subregional/Area Fees (habitat mitigation fees, Road and Bridge Benefit Assessment Districts, and other area-specific infrastructure/capital facilities fees).

These fees are set/administered by a combination of water districts, school districts, individual cities, the County, the Western Riverside Council of Governments, the Western Riverside County Regional Conservation Authority, and other special districts.

- **Fees for each land use type have increased on average by between 6.9 and 24.5 percent since the prior 2018-19 Study.** As shown in **Table 1**, average fee totals for residential uses now range from \$32,099 for multifamily units to \$57,078 for single-family units, and average fee totals for nonresidential uses now range from \$6.48 per square foot for industrial projects to \$25.27 per square foot for retail projects.

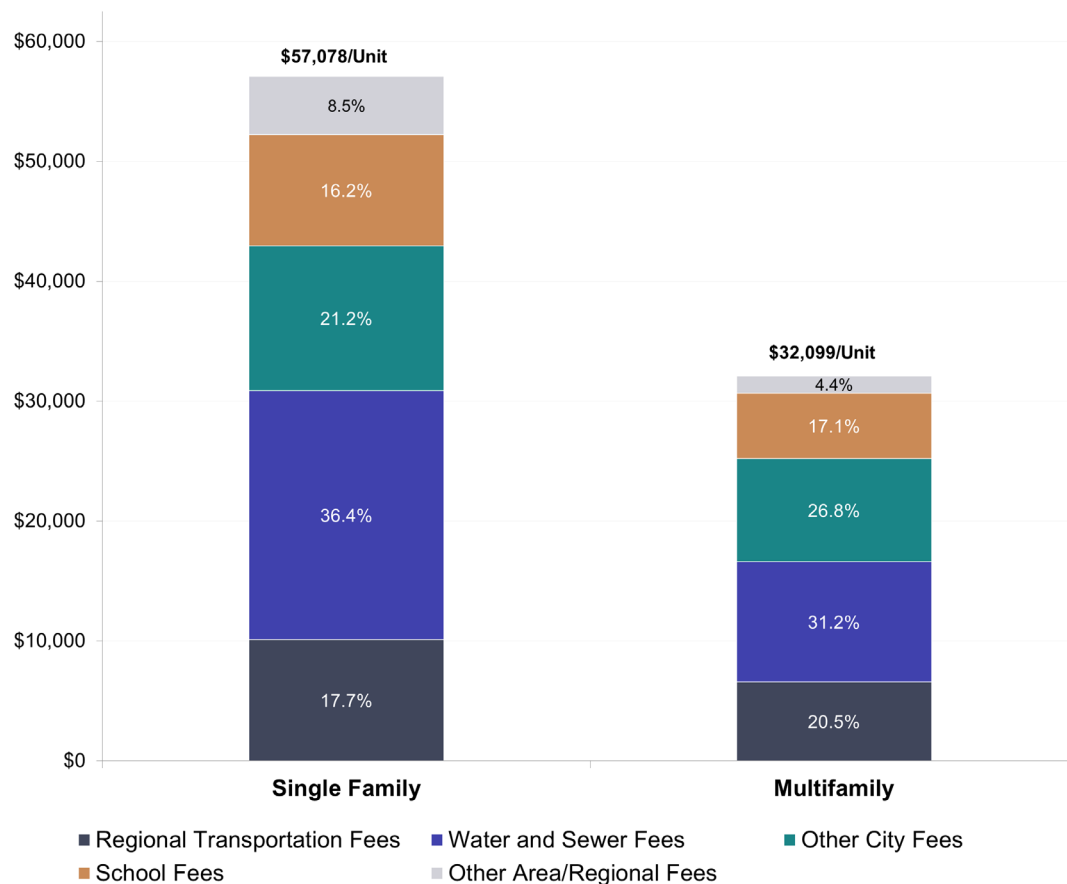
Table 1 Average Total Fee Amounts & Changes since 2018-19 Study by Land Use Type

Land Use	2022-23	2018-19	% Change
Single Family			
Total Fees per Unit	\$57,078	\$47,470	20.2%
Multifamily			
Total Fees per Unit	\$32,099	\$29,706	8.1%
Retail			
Total Fees per SF	\$25.27	\$23.63	6.9%
Office			
Total Fees per SF	\$17.04	\$14.06	21.2%
Industrial			
Total Fees per SF	\$6.48	\$5.20	24.5%

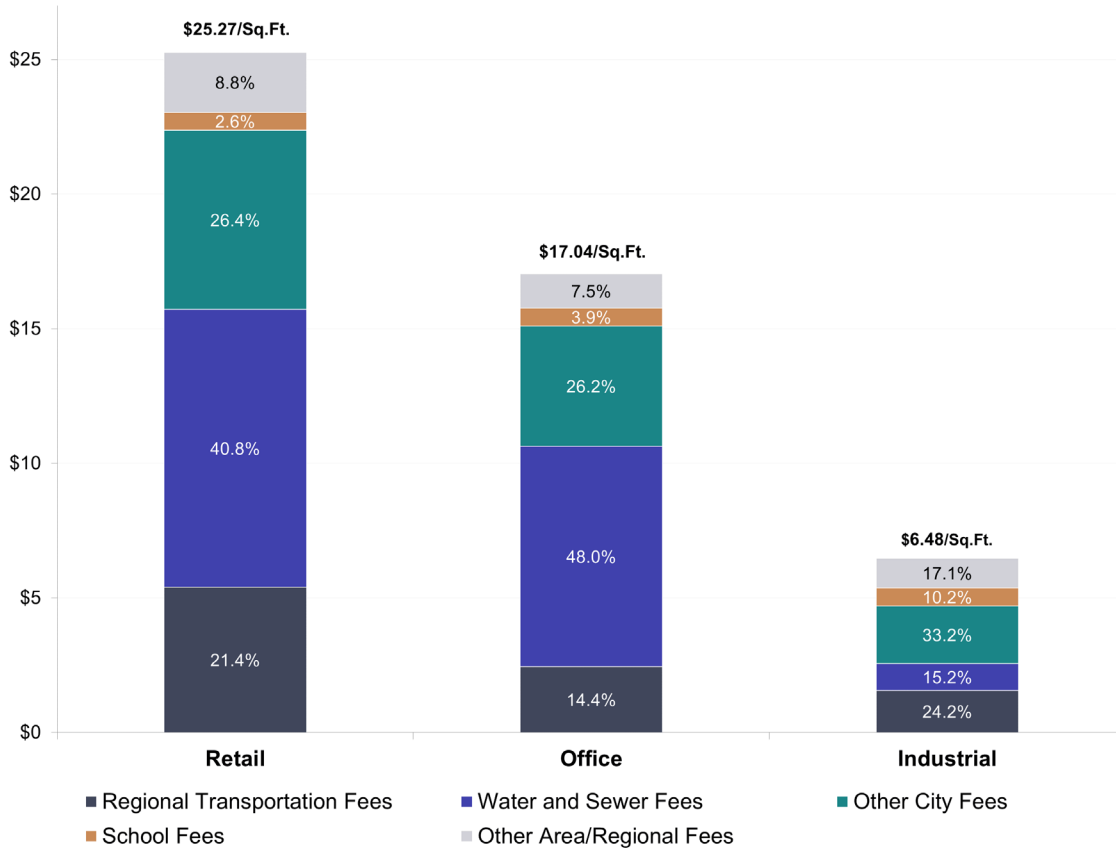
FINDING #2: TUMF represents a modest proportion of total residential development impact fees in Western Riverside County and a more variable proportion of nonresidential development impact fees.

- **For residential developments, TUMF represents close to 20 percent of total development impact fees for both single-family and multifamily development.** Other fee categories are shown in **Figure 1** below. Water and Sewer Fees together represent the greatest proportion of residential development impact fees. The smallest proportion is associated with Other Area/Regional Fees.

Figure 1 Average WRCOG Residential Development Impact Fees by Fee Category

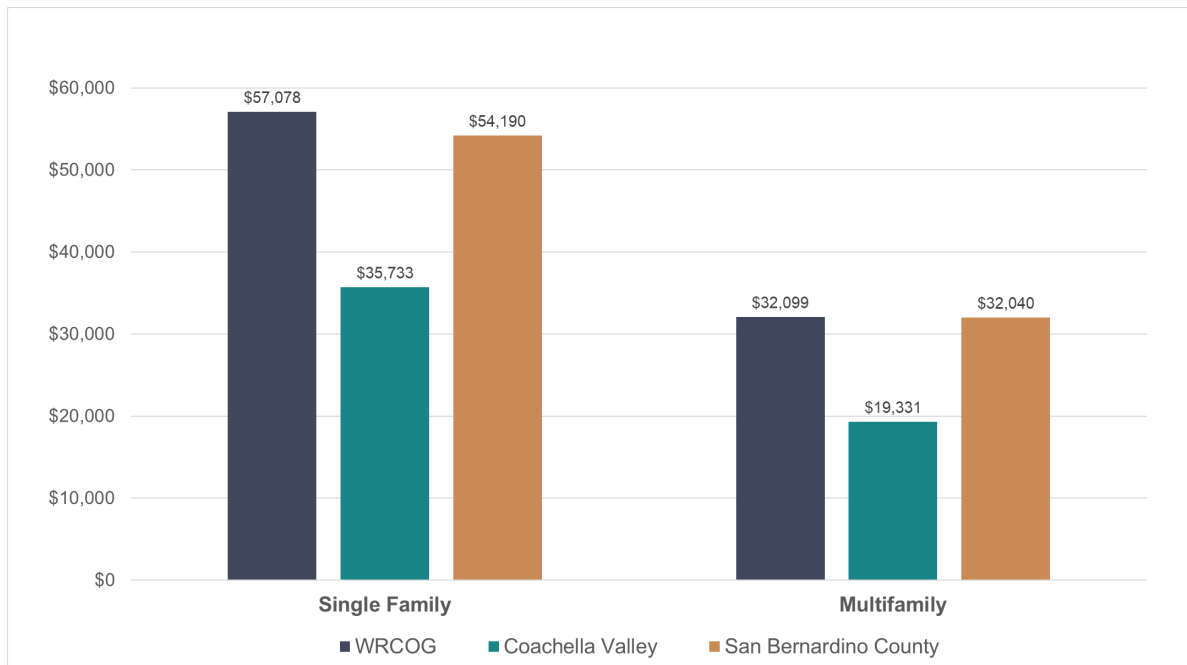


- **Regional Transportation Fees (TUMF) as a proportion of total development impact fees show more variation for nonresidential land uses.** Retail and office fees are dominated by Water and Sewer Fees. For industrial developments, Water and Sewer Fees are substantially lower and Other City Fees are the greatest proportion of total fees (**Figure 2**).

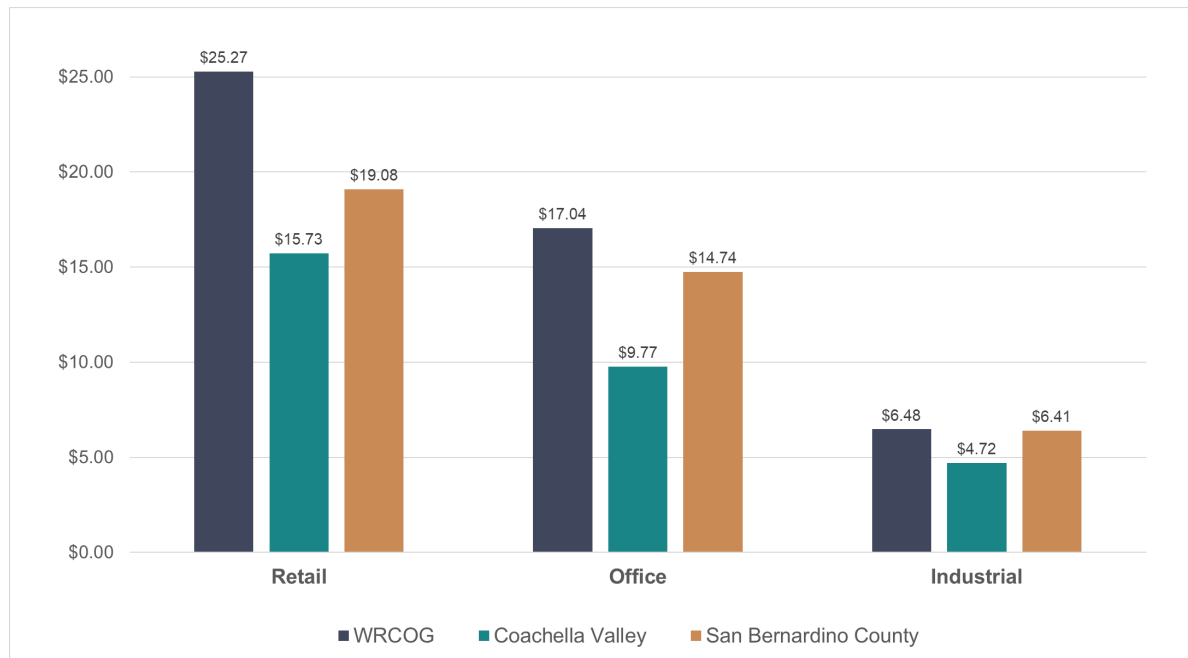
Figure 2 Average WRCOG Nonresidential Development Impact Fees

FINDING #3: Average development impact fees in WRCOG member jurisdictions are generally similar to those in San Bernardino County, though higher than those in Coachella Valley.

- Average residential development impact fees for WRCOG jurisdictions are equal to or somewhat higher than the average of selected San Bernardino County cities and the average of selected Coachella Valley cities.** As seen in **Figure 3** below, when compared with the average of selected San Bernardino County cities (Fontana, Yucaipa, San Bernardino, Ontario, Chino, and Rialto) and Coachella Valley cities (Indio, Palm Desert, and Palm Springs), the WRCOG average is slightly higher than the San Bernadino County fees for single-family development and the same for multifamily development. Coachella Valley has substantially lower fees on both single-family and multifamily development.

Figure 3 Average Residential Development Impact Fees in Neighboring Jurisdictions

- Average nonresidential development impact fees for WRCOG jurisdictions are either higher than or similar to the average of selected San Bernardino County cities for the different land use categories. The average of selected Coachella Valley cities is lower for all land use categories.** As seen in **Figure 4** below, comparing average nonresidential development impact fees in WRCOG to selected San Bernardino County cities shows that, on average, WRCOG fees are substantially higher for retail, somewhat higher for office development, and the same for industrial development. The selected Coachella Valley cities have the lowest average fees in all these nonresidential land uses.

Figure 4 Average Nonresidential Development Impact Fees in Neighboring Jurisdictions

FINDING #4: Average development impact fees among WRCOG member jurisdictions represent between 3.9 percent and 8.9 percent of total development costs/returns, with TUMF as a lower fraction of these proportions.

- Total development impact fees represent between 3.9 percent and 8.9 percent of total development costs/returns for the prototype feasible projects.** As shown in **Table 2** below, development impact fees represent 8.9 percent of total development costs/returns for the prototype single-family and 7.9 percent of total costs/returns for multifamily developments. As is common, nonresidential development impact fees are lower as a percent of total development cost/return at 3.9 percent for industrial development and 4.7 percent for office development. For retail development, the fee level is 6.8 percent of total costs/returns, between that of residential uses and other nonresidential uses.
- TUMF represents between 0.7 percent and 1.6 percent of total development costs/returns for the prototype feasible projects. While changes in the TUMF can add or subtract from total development costs, it would take a substantial change to increase/decrease overall development costs/returns by more than 1 percent.** As a proportion of overall development costs, TUMF represents 1.6 percent for both single-family and multifamily. For nonresidential uses, TUMF represents 0.7 percent of total development costs for office development, 1.0 percent for industrial development, and 1.4 percent for retail development. TUMF represents between 14.4 percent and 21.4 percent of total development impact fees with the highest ratios for retail and industrial development and lowest for office development, as seen previously in **Figure 2**.

Table 2 Development Impact Fees as % of Total Developments Cost/Returns*

Development Impact Fees	Single Family	Multifamily	Industrial	Retail	Office
TUMF	1.6%	1.6%	1.0%	1.4%	0.7%
Other Development Impact Fees	<u>7.4%</u>	<u>6.2%</u>	<u>3.0%</u>	<u>5.3%</u>	<u>4.0%</u>
Total Development Fees	8.9%	7.9%	3.9%	6.8%	4.7%

*Totals may not sum due to rounding.

Organization of Report

After this initial chapter, this report is divided into three other chapters and several appendices. **Chapter 2** describes the definitions, methodology, and results of the fee review and comparison for WRCOG and non-WRCOG jurisdictions. **Chapter 3** describes the TUMF and other development impact fees as components of overall estimated development costs and returns for each development prototypes evaluated. Finally, **Chapter 4** provides a brief conclusion on the purposes and goals of this and other development impact fee comparison studies.

The appendices provide a substantial amount of additional supporting detail and information, including:

- **APPENDIX A** provides detailed information on the Development Prototypes.
- **APPENDIX B** provides information on assumptions around location and corresponding service provider (e.g., water district, school district) assignments within each jurisdiction.
- **APPENDIX C** provides fee comparison summaries and detailed fee estimation information for each WRCOG jurisdiction/area and each land use category.

2. Development Impact Fee Review and Comparison

To accomplish the study purpose outlined in **Chapter 1**, development impact fees were estimated for each WRCOG jurisdictions as well as for selected neighboring jurisdictions in Coachella Valley and San Bernardino County. This required detailed research into fee schedules and calculation methodologies for each of these jurisdictions and associated service providers.

All the development impact fee estimates shown are based on fee schedules and information available at the time the research was conducted, primarily during the summer of 2022. EPS attempted to use the most current and up-to-date fee information to enhance comparability and create a representation of fee levels at a single moment in time. However, limited online availability of complete fee information in some jurisdictions and annual fee program update schedules (typically in July) in several jurisdictions added an additional challenge in pinpointing fees at a given moment in time. While every effort was made to ensure that fees are updated and comparable, the final estimates should be considered as planning-level approximations. The actual fees due for a particular project will depend on the specifications of the individual project and the fee schedule at the time of project application.

The first section below provides some key definitions. The subsequent section provides a detailed description of the fee research methodology. The final section provides findings concerning development impacts fees in WRCOG member jurisdictions and other jurisdictions studied. In general, the definitions and approach in this study are consistent with those in the 2018-19 Study to maintain consistency. In some situations, as noted below, refinements were necessary; for example, some water districts provided new information on the water meter assumptions to be used in fee calculations.

Study Definition

Development impact fees have become an increasingly used mechanism among California jurisdictions to require new development to fund the demands it places on local and regional infrastructure and capital facilities. As already noted, this report defines development impact fees as one-time fees collected for the purposes of funding infrastructure and capital facilities. This includes fees for the funding of a broad range of capital improvements, including water, sewer, storm drain, transportation, parks and recreation, public safety, and numerous other types of civic/community facilities. The majority of these fees are adopted under or consistent with the Mitigation Fee Act, though the analysis also includes other one-time capital facilities fees, such as parkland in-lieu fees under the Quimby Act and one-time charges through Community Facilities Districts or Benefit Assessment Districts among others.

This report does not include estimates of other types of fees charged by cities including permitting, planning, and processing fees that are charged on new development, and that do not fund capital facilities/infrastructure. These fees are typically associated with some sort of review

or administrative service provided by a jurisdiction and are typically more modest charges relative to development impact fees (most studies find them to be in the 5 to 15 percent range of development impact fees, between 1 and 2 percent of total development costs).

Some typical fee types that fall in this category of permitting, planning, and processing fees and that are standard across most development projects include:

- **Building Permit Fee** – This fee is charged in a various of ways. Jurisdictions charge based on development size, development valuation, or flat fee.
- **Plan Check Fee** – This fee is charged in a various of ways. Jurisdictions charge based on development size, development valuation, flat fee, percentage of the Building Permit Fee, or an hourly charge.
- **California Building Standards Commission Fee** – This fee is calculated by charging \$1 per \$25,000 of a development's valuation multiplied by the development's area.
- **Strong Motion Instrumentation Program Fee** – This fee is calculated by charging \$13 per \$100,000 of a development's valuation multiplied by the development's area.
- **Technology Surcharge** – This fee is charged differently by jurisdiction. Some jurisdictions charge based on the development's valuation and area, while other some jurisdictions choose to charge this as a percentage of the Building Permit Fee.

Many other fee types exist that are project-dependent and may be related to: various inspections, tentative tract/parcel maps, conditional use permits, plan amendments, annexations, and a wide variety of minor permits. These are typically charged through some combination of flat fee, deposit, and/or actual hourly costs incurred by planning or building department staffs.

Methodology

In order to provide a fee comparison that was as close as possible to an “apples-to-apples” comparison, WRCOG staff and EPS identified the following parameters to guide the study:

- Jurisdictions to be studied.
- Land uses to be evaluated and associated development prototypes.
- Selection of service providers where there are multiple service providers in same jurisdiction.
- Categorization of the various types of development impact fees

This section describes these study parameters as well as the process of review with the jurisdictions/relevant service providers.

Selection of Jurisdictions for Prototype Analysis

Jurisdictions selected for this analysis include all eighteen (18) WRCOG member cities. WRCOG staff and the EPS also identified three additional unincorporated areas to study, the March JPA, Temescal Valley, and Winchester, all locations where substantial growth is occurring and/or planned within the WRCOG region.

A separate prototype was tested for each city within the WRCOG, as well as three unincorporated areas. Wherever possible, this analysis sought to use the same jurisdictional assumptions as in the 2018-19 Study. Where cities or unincorporated areas are served by multiple school districts, utility districts, and other subdistricts or assessment zones, assumptions were made around subarea locations, as discussed later in this Chapter.

Table 3 shows the cities/communities evaluated, including the twenty-one (21) WRCOG cities/communities and the nine (9) non-WRCOG comparison communities.

Table 3 Jurisdictions Included in Fee Study

WRCOG Jurisdiction		Coachella Valley	San Bernardino County
Banning	Murrieta	Indio	Fontana
Beaumont	Norco	Palm Desert	Yucaipa
Calimesa	Perris	Palm Springs	San Bernardino
Canyon Lake	Riverside		Ontario
Corona	San Jacinto		Chino
Eastvale	Temecula		Rialto
Hemet	Wildomar		
Jurupa Valley	Temescal Valley		
Lake Elsinore	Winchester		
Menifee	March JPA		
Moreno Valley			

Land Uses and Development Prototypes

Land Uses

Development impact fees are levied on a variety of residential and nonresidential land uses with variations for different uses and certain product types often built into the fee programs.

For the purposes of this study, five (5) common land use types that reflect typical development projects and are consistent with prior studies were selected: single-family residential, multifamily residential, retail, office, and "high-cube" industrial²

Development Prototype Selections

Within each of the five (5) general land use types selected, this study identifies a detailed development prototype meant to represent a typical development that may likely occur anywhere within the WRCOG region. Based on the characteristics of the prototype, the development impact fees can be calculated for each jurisdiction based on applicable fee levels.

² "High Cube" is defined as warehouses/distribution centers with a minimum gross floor area of 200,000 sq. ft., minimum ceiling height of 24 feet, and minimum dock-high door loading ratio of 1 door per 10,000 sq. ft.

Choosing a representative prototype that is the same across all jurisdictions ensures that the fee comparison will be “apples-to-apples”.

As a starting point, this study utilized the development prototypes used in the 2018-19 Study for each of the five land uses. EPS then reviewed recent data on new single-family, multifamily, office, retail, and industrial developments throughout WRCOG jurisdictions to confirm whether the prototypes still match common characteristics.

Information on multifamily, retail, office, and industrial developments built between 2017 and 2022 was reviewed as was information on single-family developments between 2019 and 2022. Single-family developments were reviewed over a shorter timeframe based on the much larger size of the dataset available (the number of homes built has been much greater relative to the number of other projects). From this data, EPS identified the median building/home size in square feet (and lot size for single-family developments) for each of the land use types and compared these against the prior prototypes.

Based on this analysis, EPS confirmed that all prototypes were still representative of typical projects in the WRCOG region and could be used in this study update. That said, the number of very large industrial projects has increased in recent years, along with the median project size. WRCOG Staff and EPS considered doubling the size of the industrial prototype to reflect this trend and focus specifically on high-cube development, however, it was ultimately decided that utilizing the same prototype as prior studies would be more valuable in providing a better comparison to fee levels in the 2018-19 Study. Furthermore, it was determined that the selected industrial prototype still reflects a common, high-cube industrial development, and the per square foot fee estimates can still be viewed as representative of typical development impact fees for industrial projects.

These prototypes used were also vetted and reviewed in 2018 by the WRCOG Planning Directors’ Committee, Public Works Committee, and Technical Advisory Committee. The prototypes are summarized below along with images that represent examples projects with matching characteristics.

Single-Family Residential Development

50-unit residential subdivision; 2,700 square foot homes and 7,200 square foot lots



Example Prototype Single-Family Home, City of Riverside

Multifamily Residential Development

200-unit market-rate, 260,000 gross square foot apartment building



Example Prototype Multi-Family Development, City of Temecula

Retail Development

10,000-gross square foot retail building



Example Prototype Retail Development, City of Hemet

Office Development

20,000-gross square foot, Class A or Class B office building



Example Prototype Office Development, City of Hemet

Industrial Development

265,000 gross square foot “high cube” industrial building³



Example Prototype Industrial Development, City of Perris

In addition to building size, several other development characteristics can affect development impact fees. For example, many water facilities fees are tied to the number and size of meters

³ “High cube” is defined as warehouses/distribution centers with a minimum gross floor area of 200,000 sq. ft., minimum ceiling height of 24 feet, and minimum dock-high door loading ratio of 1 door per 10,000 sq. ft.

associated with a new development. Other fees are tied to the gross site or lot area. EPS utilized a set of additional development prototypes assumptions detailed in **Appendix A**.

In general, and wherever possible, these assumptions were kept consistent with those used in the 2018-19 Study to improve comparability. The 2018-19 assumptions were developed based on a review of equivalent assumptions used in other regional fee studies (e.g., in the San Joaquin Valley and the Sacramento Valley) and refined through feedback from Western Riverside County service providers. In a few cases, fee calculation formulas required even more assumptions, such as estimates of water/sewage flow rates, which were specific to and provided by each service provider.

Where assumptions differed from 2018-19, changes primarily occurred where service providers provided updated information on their typical water meter assumptions or otherwise recommended changes. In certain cases, small deviations from listed prototype assumptions were used. For example, Jurupa Community Services District (JCSD) indicated that they typically permit new single-family homes with $\frac{3}{4}$ " water pipes, which is slightly smaller than the prototype assumption of a 1" pipe, but $\frac{3}{4}$ " is more representative of typical/comparable development fees (JCSD charges much higher fees for the larger 1" pipes, so developers rarely use them) and was used in the estimate.

Subarea Location Assumptions

In some cities, there are multiple service providers providing the same type of facilities in different parts of the city. For example, some cities are served by two or more distinct school districts, and many cities are served by two or more water and/or sewer districts. Therefore, an assumption around location within a subarea or zone associated with a given service provider had to be made in order to calculate each fee estimate. Where possible, these assumptions were kept consistent with those used in the 2018-19 Study, and which were developed based on the following factors:

- Suggestions from the City.
- Commonality of service provider between multiple cities; for example, Eastern Municipal Water District serves many cities.
- Scale/nature of service areas was also considered; for example, in some cases the majority of a City was served by one service provider and/or the majority of the growth areas were served by a particular service provider.
- In some cases, there was one service provider – e.g., the City – with different fees by City subarea (e.g., storm drain). In these cases, an effort was made to select the area expected to see the most growth based on discussions with City and WRCOG staff.
- In other cases, area-specific one-time fees/assessments/special taxes were in place to cover the costs of capital facilities in a new growth area. Where substantial in scale, these areas and the associated area fees were used in the fee comparison.

The location and corresponding service provider assignment assumptions are shown in **Appendix B**.

Fee Types and Categories

The primary focus of the fee research is to develop estimates of existing development impact fees charged on new development in the selected jurisdictions. While some fees are highly uniform, such as school district fees, there is substantial variation in the naming and types of facilities included in other development impact fees. The fee review sought to organize the full set of fees in a normalized set of categories to allow for best comparison. The key fee categories are as follows, which are consistent with the 2018-19 Study:

- **Regional Transportation Fees.** This category includes the respective TUMFs in Western Riverside County and Coachella Valley. TUMF in Western Riverside County is charged by WRCOG directly on the following bases:
 - **Single-Family Residential Development** - Per unit basis.
 - **Multifamily Residential Development** - Per unit basis.
 - **Retail Development** - Per gross building square foot basis. There is no fee on the first 3,000 square feet of an retail development.
 - **Industrial Development** - Per gross building square foot basis. The industrial fee includes a base fee on square footage up to 200,000 square feet and then, where the building meets the definition of a "high cube" building⁴, an effective discount of 73 percent in the base fee for all additional development above 200,000 square feet.
 - **Office Development** - Per gross building square foot basis.

This category also includes regional transportation impact fees in other subregions/jurisdictions where they are clearly called out. In San Bernardino County, cities are similarly required to contribute towards regional transportation funding, but not all of them distinguish between local and regional fees, in which case all transportation fees fall under the "Other City Fees" category.

- **Water and Sewer Fees.** All development locations studied were subject to some form of water and sewer development impact fees, whether a connection or capacity related charge, and these are combined into one category. These are typically collected either by a city or directly by a service provider
- **Other City Fees.** Beyond water/sewer fees (which are sometimes charged or collected by cities), jurisdictions frequently adopt a large number of additional citywide (or countywide)

⁴ "High Cube" is defined as warehouses/distribution centers with a minimum gross floor area of 200,000 sq. ft., minimum ceiling height of 24 feet, and minimum dock-high door loading ratio of 1 door per 10,000 sq. ft.

fees used to fund various capital facilities. This category captures a wide variety of fees including: local transportation fees, parks and recreation facilities fees, Quimby Act in-lieu parkland fees, storm drain fees, public safety facilities fees, other civic/community facilities fees, and, on occasion, affordable housing, or public art in-lieu fees.

- **School Fees.** School facilities fees are governed by State law and therefore show more similarity between jurisdictions than most fees. Under State law, School Districts can charge specified Level 1 development impact fees. If School Districts go through the process of identifying and estimating required capital improvement costs, higher Level 2 fees can be charged to fund up to 50 percent of the School District's capital improvement costs. Only five school districts serving WRCOG jurisdictions charged Level 2 fees at the time of this study.
- **Other Area/Regional Fees.** A final category was developed to capture other fees not included in the above categories, typically other sub-regional fees or area-specific fees. For example, this category includes the Western Riverside County Multiple Species Habitat Conservation Plan mitigation fee, various Road and Bridge Benefit Districts (RBBD) fees, as well as other one-time community facilities district charges/fees for infrastructure/capital facilities applied in particular growth areas.

Fee Estimation and Review Process

For WRCOG member jurisdictions, EPS worked with WRCOG staff to complete the following data collection and review process to come up with each fee estimate:

- Confirm base assumptions including development prototype characteristics and set of service providers
- Use online sources to obtain development impact fee schedules from each jurisdiction or service provider.
- Identify and list development impact fees charged in jurisdiction and/or for each service provider.
- Where fee schedule provided insufficient information, review available mitigation fee nexus studies, ordinances, or resolutions, as applicable.
- Where sufficient data was not available or incomplete, contact City, County, or other service provider to obtain/confirm appropriate fee schedules.
- Develop initial estimates of each development impact fee for each development prototype.
- Review estimates in comparison with 2018 fee amounts to identify unusual or unexpected discrepancies or large changes in fee levels.
- Compile summary charts showing initial fee estimates and share with representatives of each jurisdiction and/or relevant service providers (e.g., Eastern Municipal Water District).
- Receive feedback, corrections, and refinements (and in some cases actual fee calculations).
- Refine fee estimates based on feedback and confirm changes with jurisdictions.

For non-WRCOG jurisdictions, the process followed was largely the same, except that fee estimate information was not reviewed by jurisdiction representatives.

Findings from WRCOG Member Jurisdiction Fee Review

General findings from fee research for the WRCOG region are summarized below.

On average, WRCOG TUMF residential fees represent close to 20 percent of total development impact fees for both single-family and multifamily development. Regional Transportation Fees (or TUMF) for both single-family TUMF and multifamily TUMF represent around 20 percent of the respective average total development impact fees, with the percentage for single-family development being slightly lower at 17.7% compared with 20.5% for multifamily development. However, within individual jurisdictions, fee totals vary widely – from \$41,338 per unit to \$82,711 per unit for single-family development and from \$19,267 per unit to \$47,196 per unit for multifamily development – and TUMF, which is the same across jurisdictions, therefore varies as a percent of total fees from 12.2 percent to 24.4 percent for single-family development and 13.9 percent to 34.2 percent for multifamily development (see **Table 4**, and **Figure 5**). Nominal average fee totals by fee category are shown in **Table 5**.

Table 4 TUMF as a Proportion of Total Fees

Item	Average	Range	
		Low	High
Single Family			
Total Fees per Unit	\$57,078	\$41,338	\$82,711
TUMF as a % of Total Fees	17.7%	24.4%	12.2%
Multifamily			
Total Fees per Unit	\$32,099	\$19,267	\$47,196
TUMF as a % of Total Fees	20.5%	34.2%	13.9%
Industrial			
Total Fees per SF	\$6.48	\$4.02	\$10.98
TUMF as a % of Total Fees	24.2%	39.0%	14.3%
Retail			
Total Fees per SF	\$25.27	\$14.21	\$39.61
TUMF as a % of Total Fees	21.4%	38.0%	13.6%
Office			
Total Fees per SF	\$17.04	\$8.30	\$25.11
TUMF as a % of Total Fees	14.4%	29.5%	9.8%

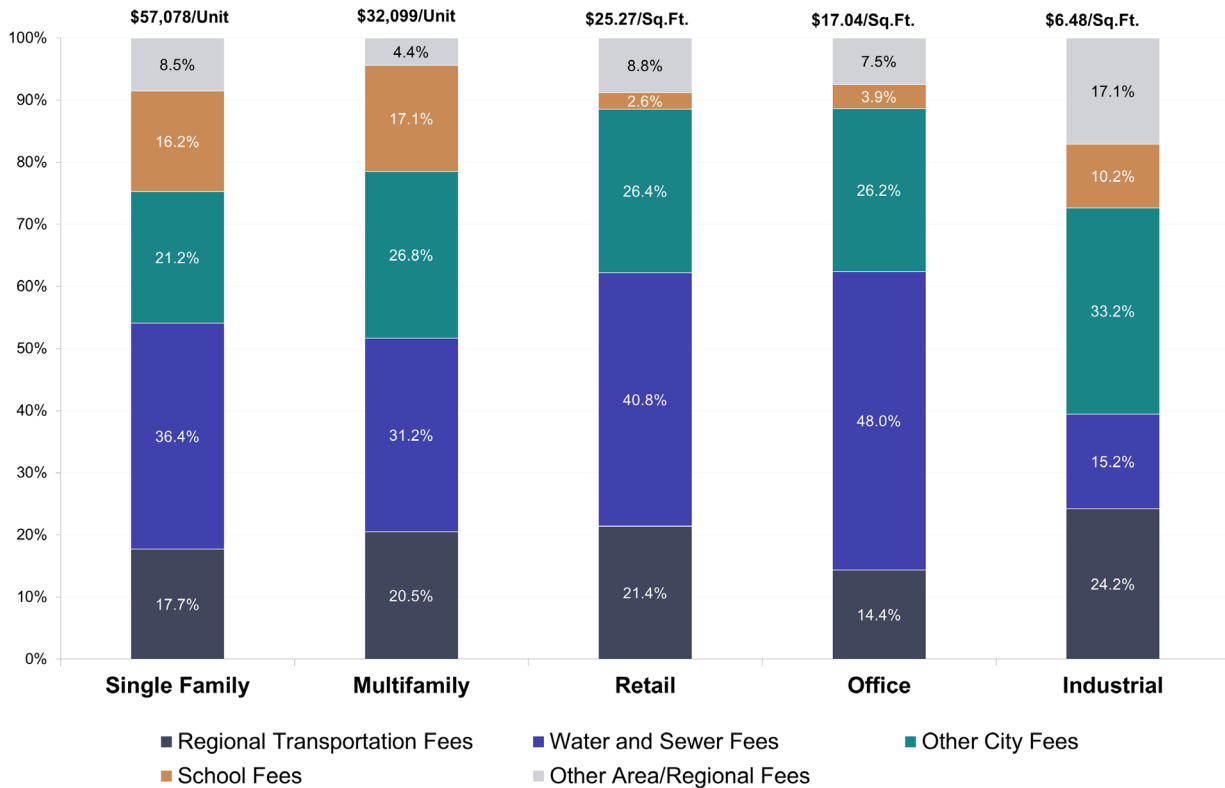
* Average and ranges as shown encompass 21 jurisdiction, including 18 cities and the incorporated areas of Temescal Valley, Winchester, and March JPA.

On average, WRCOG nonresidential TUMF shows more variation in level and in proportion of overall development impact fees (between 10 percent and 39 percent) than for the residential fee categories. Average total retail fees are about \$25 per square foot, of which Regional Transportation Fees represent 21 percent. Due to the variation in the total fees on retail development among jurisdictions (from \$14.21 to \$39.26 per square foot), TUMF as a percent of total fees ranges from 13.6 percent to 38 percent. Average total industrial fees are substantially lower at \$6.48 per square foot with a range from \$4.08 per square foot to \$10.98 per square foot. TUMF represents about 24 percent of the average total industrial fees, with a range from 14.3 percent to 39 percent. Total fees on office development fall in between the retail and industrial fees at an average of \$17.04 per square foot and a range from \$8.30 to \$25.11 per square foot. The TUMF fee represents a relatively low 14.4 percent of average overall fees on office development with a range from 9.8 percent to 29.5 percent (see **Table 4**, **Table 5**, and **Figure 5**).

Nonresidential development impact fees show more variation in terms of the distribution between fee categories. Retail fees are dominated by water and sewer fees (40.8 percent) as well as Regional Transportation Fees (21.4 percent). Fees for industrial buildings, which are typically less intensive water users, are lower overall and more dominated on a proportionate basis by Other City fees (33.2 percent) and Regional Transportation Fees (24.2 percent). Office fees reflect a different pattern with substantial Water and Sewer Fees at 48 percent followed by Other City fees at 26.2 percent (see **Table 5** and **Figure 5**).

Table 5 Average Development Impact Fee Costs by Category in WRCOG Region

Fee	Single Family (per Unit)	Multifamily (per Unit)	Industrial (per Sq.Ft)	Retail (per Sq.Ft)	Office (per Sq.Ft)
Regional Transportation Fees	\$10,104	\$6,580	\$1.57	\$5.40	\$2.45
Water and Sewer Fees	\$20,772	\$10,012	\$0.99	\$10.31	\$8.19
Other City Fees	\$12,075	\$8,608	\$2.15	\$6.66	\$4.47
School Fees	\$9,275	\$5,480	\$0.66	\$0.66	\$0.66
Other Area/Regional Fees	<u>\$4,853</u>	<u>\$1,418</u>	<u>\$1.11</u>	<u>\$2.23</u>	<u>\$1.27</u>
Total Fees	\$57,078	\$32,099	\$6.48	\$25.27	\$17.04

Figure 5 Average Development Impact Fee Costs in WRCOG Jurisdictions

Unincorporated jurisdictions have slightly lower total fees as compared to the average for all WRCOG study jurisdictions. For single-family and multifamily residential uses, total fees for the unincorporated study areas were 85 percent and 95 percent, respectively, of the WRCOG average total fee amount for residential uses, as shown in **Table 6**. For nonresidential uses, total fees for unincorporated study areas were between 67 and 73 percent of the WRCOG average for nonresidential uses. Across land use types, this difference can be primarily attributed to fewer fees in the Other City Fees category.

Table 6 Unincorporated Jurisdictions/March JPA and Total Jurisdictions Comparisons

Item	Single Family (per Unit)	Multifamily (per Unit)	Industrial (per Sq.Ft)	Retail (per Sq.Ft)	Office (per Sq.Ft)
Unincorporated Jurisdictions and March JPA	\$48,672	\$30,341	\$4.37	\$17.61	\$12.49
Total Jurisdictions	\$57,078	\$32,099	\$6.48	\$25.27	\$17.04
Unincorporated Jurisdictions and March JPA / Total Jurisdiction	85%	95%	67%	70%	73%

Fee Level Changes since 2018-19 Study

Table 7 through **Table 11** provide additional detail on the changes in fee levels by fee category.

Table 7 Single Family 2018-2022 Fee Comparison

Single Family	Average Fee Per Dwelling Unit			
	2018	2022	\$ Change	% Change
Regional Transportation Fees	\$8,873	\$10,104	\$1,231.00	13.9%
Water and Sewer Fees	\$17,070	\$20,772	\$3,702	21.7%
Other City Fees	\$10,055	\$12,075	\$2,020	20.1%
School Fees	\$8,785	\$9,275	\$489	5.6%
Other Area/Regional Fees	\$2,686	\$4,853	\$2,167	80.7%
Total Fees	\$47,470	\$57,078	\$9,609	20.2%

Table 8 Multifamily 2018-2022 Fee Comparison

Multifamily	Average Fee Per Dwelling Unit			
	2018	2022	\$ Change	% Change
Regional Transportation Fees	\$6,134	\$6,580	\$446	7.3%
Water and Sewer Fees	\$9,636	\$10,012	\$376	3.9%
Other City Fees	\$7,231	\$8,608	\$1,377	19.0%
School Fees	\$5,191	\$5,480	\$289	5.6%
Other Area/Regional Fees	\$1,512	\$1,418	-\$94	-6.2%
Total Fees	\$29,706	\$32,099	\$2,393	8.1%

Table 9 Retail 2018-2022 Fee Comparison

Retail	Average Fee Per Square Foot			
	2018	2022	\$ Change	% Change
Regional Transportation Fees	\$7.50	\$5.40	-\$2.10	-27.9%
Water and Sewer Fees	\$9.84	\$10.31	\$0.47	4.8%
Other City Fees	\$4.75	\$6.66	\$1.91	40.3%
School Fees	\$0.59	\$0.66	\$0.07	11.7%
Other Area/Regional Fees	\$0.95	\$2.23	\$1.28	135.7%
Total Fees	\$23.63	\$25.27	\$1.64	6.9%

Table 10 Office 2018-2022 Fee Comparison

Office	Average Fee Per Square Foot			
	2018	2022	\$ Change	% Change
Regional Transportation Fees	\$2.19	\$2.45	\$0.26	11.9%
Water and Sewer Fees	\$7.34	\$8.19	\$0.84	11.5%
Other City Fees	\$3.39	\$4.47	\$1.07	31.6%
School Fees	\$0.59	\$0.66	\$0.07	11.7%
Other Area/Regional Fees	\$0.54	\$1.27	\$0.73	135.8%
Total Fees	\$14.06	\$17.04	\$2.98	21.2%

Table 11 Industrial 2018-2022 Fee Comparison

Industrial	Average Fee Per Square Foot			
	2018	2022	\$ Change	% Change
Regional Transportation Fees	\$1.45	\$1.57	\$0.11	7.9%
Water and Sewer Fees	\$1.04	\$0.99	-\$0.05	-4.7%
Other City Fees	\$1.65	\$2.15	\$0.50	30.1%
School Fees	\$0.59	\$0.66	\$0.07	11.7%
Other Area/Regional Fees	\$0.47	\$1.11	\$0.64	137.1%
Total Fees	\$5.20	\$6.48	\$1.27	24.5%

Findings from Fee Comparison with Non-WRCOG Jurisdictions

Figure 6 through **Figure 9** compare the average overall WRCOG development impact fees (and their proportionate distributions between the five major fee categories) with other cities/groups of cities for all five land uses/development prototypes studied. The comparative cities/subregions include selected jurisdictions in the Coachella Valley and San Bernardino County.

Average development impact fees for WRCOG jurisdictions are equal to or somewhat higher than the average of selected San Bernardino County cities. When compared with the average of selected San Bernardino County cities (Fontana, Yucaipa, San Bernardino, Ontario, Chino, and Rialto), the WRCOG average is higher for all land uses, and roughly equivalent for multifamily and industrial. New development in San Bernardino County cities is required to make payments towards regional transportation infrastructure, though the distinction between the regional and local transportation fees is often unclear. Overall, the combination of Regional Transportation Fees, Other City fees, and Area/Other Regional fees is lower in San Bernardino County than in Riverside County for all land uses.

The average development impact fees for selected Coachella Valley cities are lower than the WRCOG averages for all land uses. The average for selected Coachella Valley cities (Indio, Palm Desert, and Palm Springs) is substantially lower for single-family, multifamily, office, and retail development, and modestly lower industrial development. In the case of residential uses, this is primarily due to lower Regional Transportation Fees and Other City Fees. For nonresidential uses, this is more generally attributable to lower Water and Sewer Fees and lower Other Area/Regional Fees.

Figure 6 Average Single-Family Development Impact Fee Costs and Proportions in Neighboring Jurisdictions

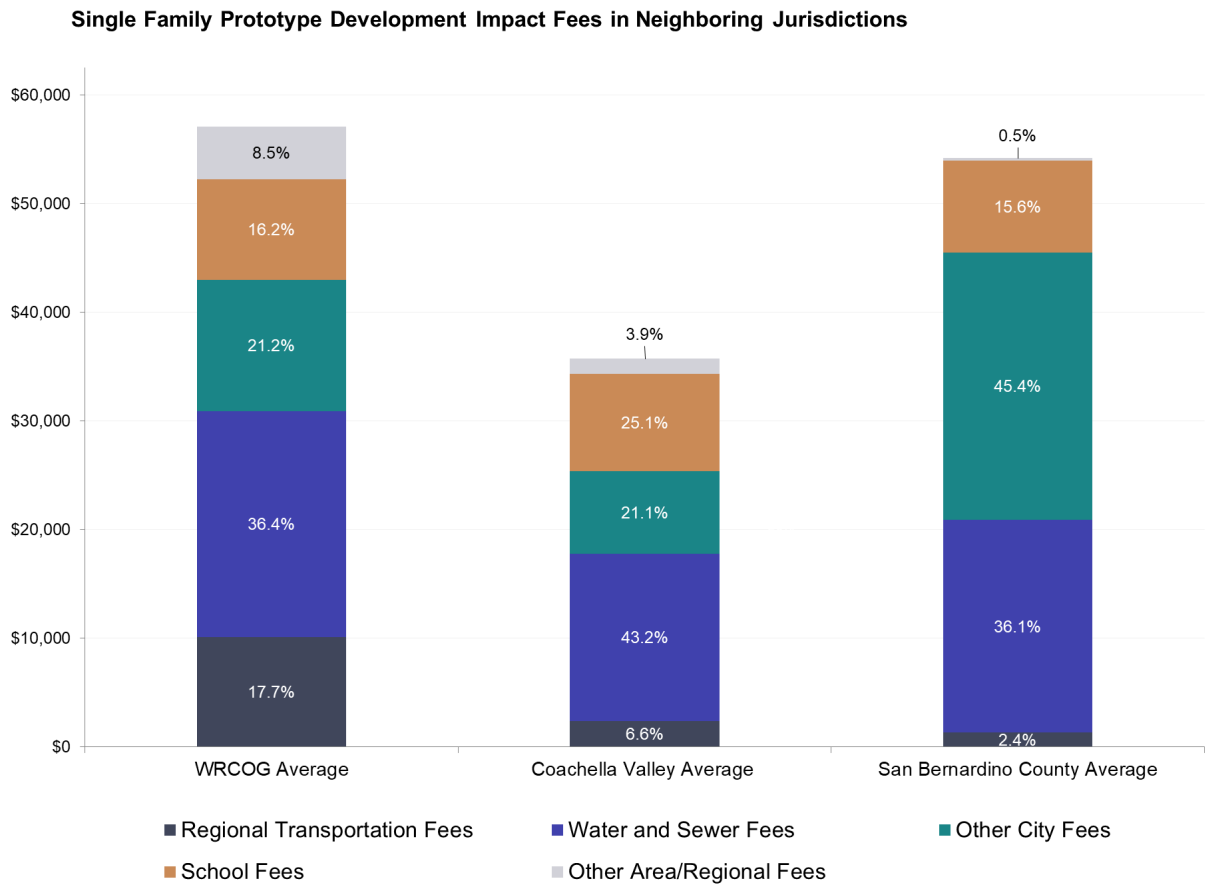


Figure 7 Average Multifamily Development Impact Fee Costs and Proportions in Neighboring Jurisdictions

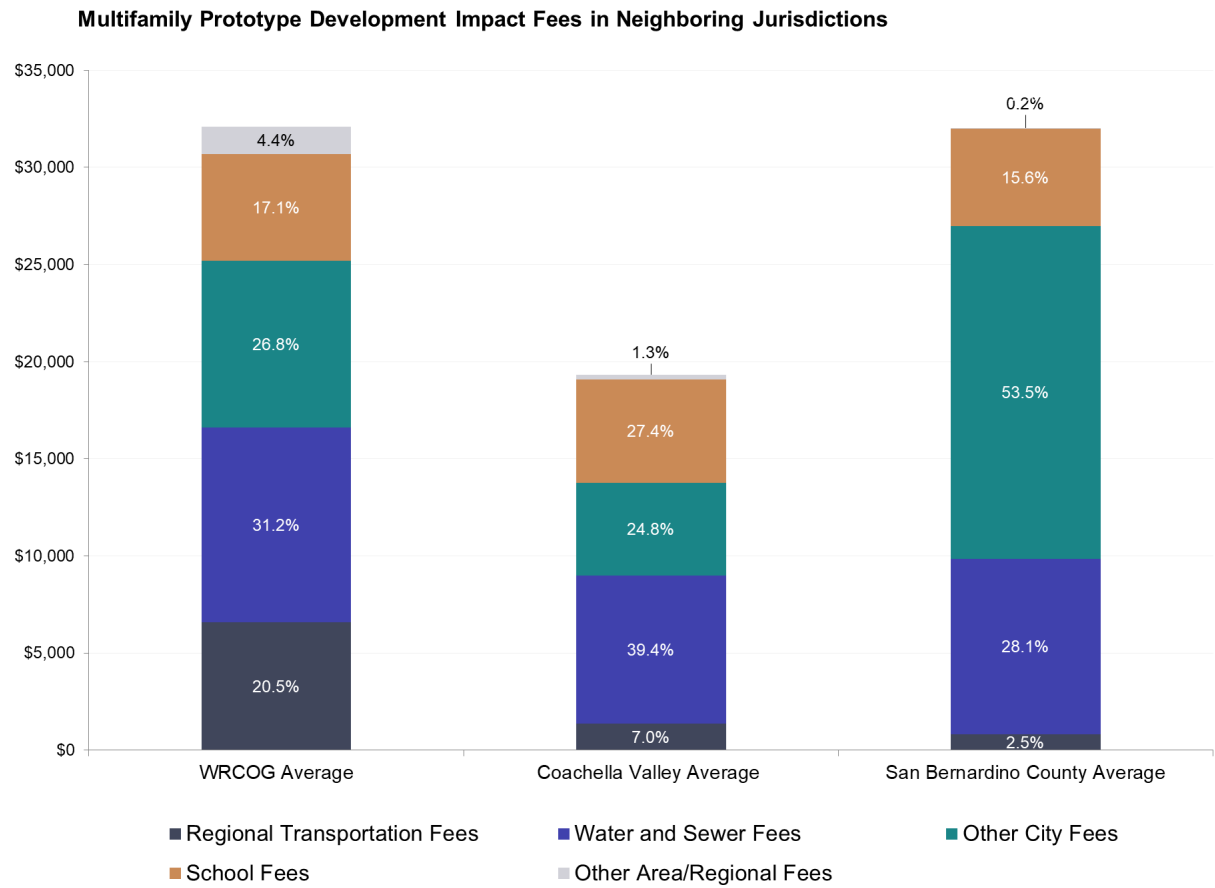


Figure 8 Average Retail Development Impact Fee Costs and Proportions in Neighboring Jurisdictions

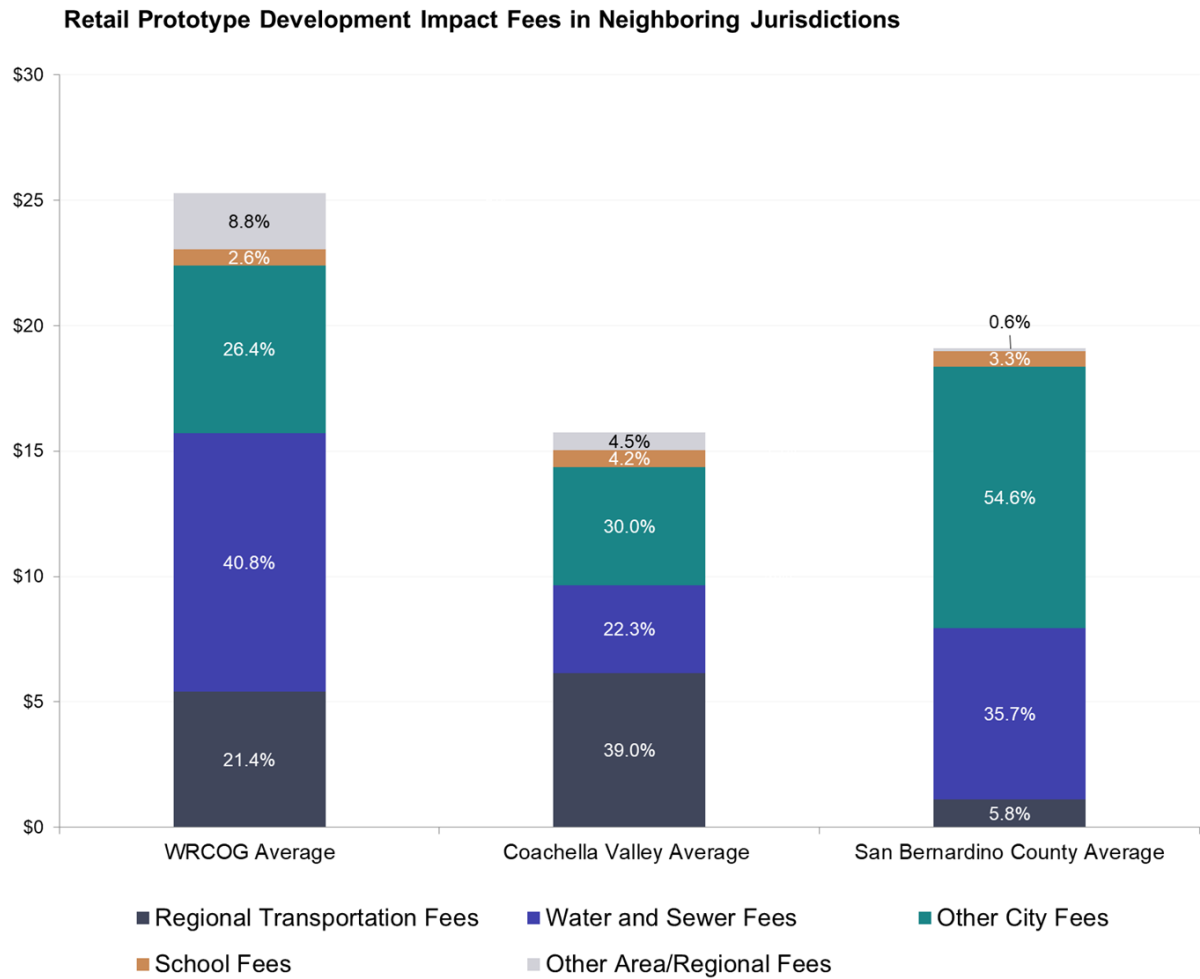


Figure 9 Average Office Development Impact Fee Costs and Proportions in Neighboring Jurisdictions

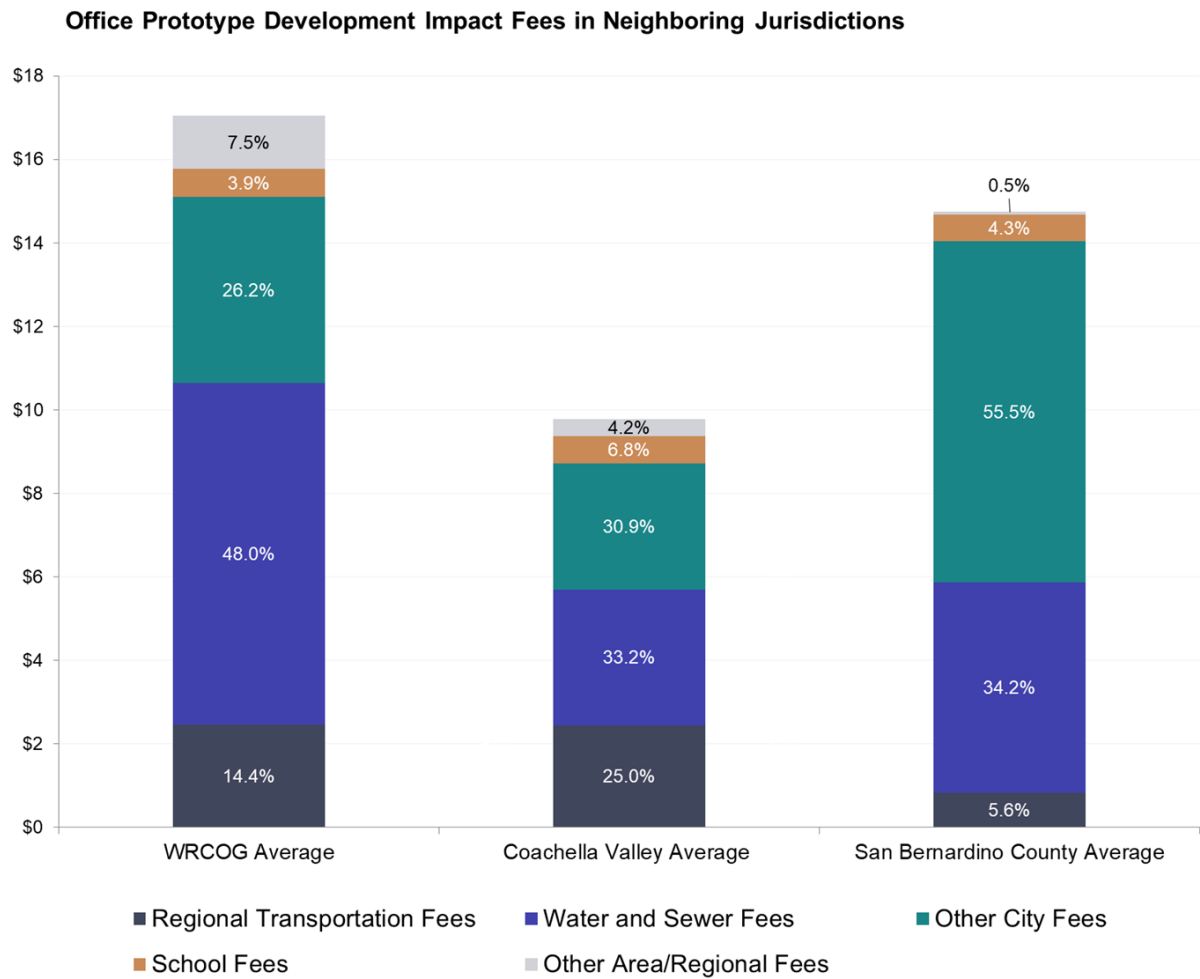
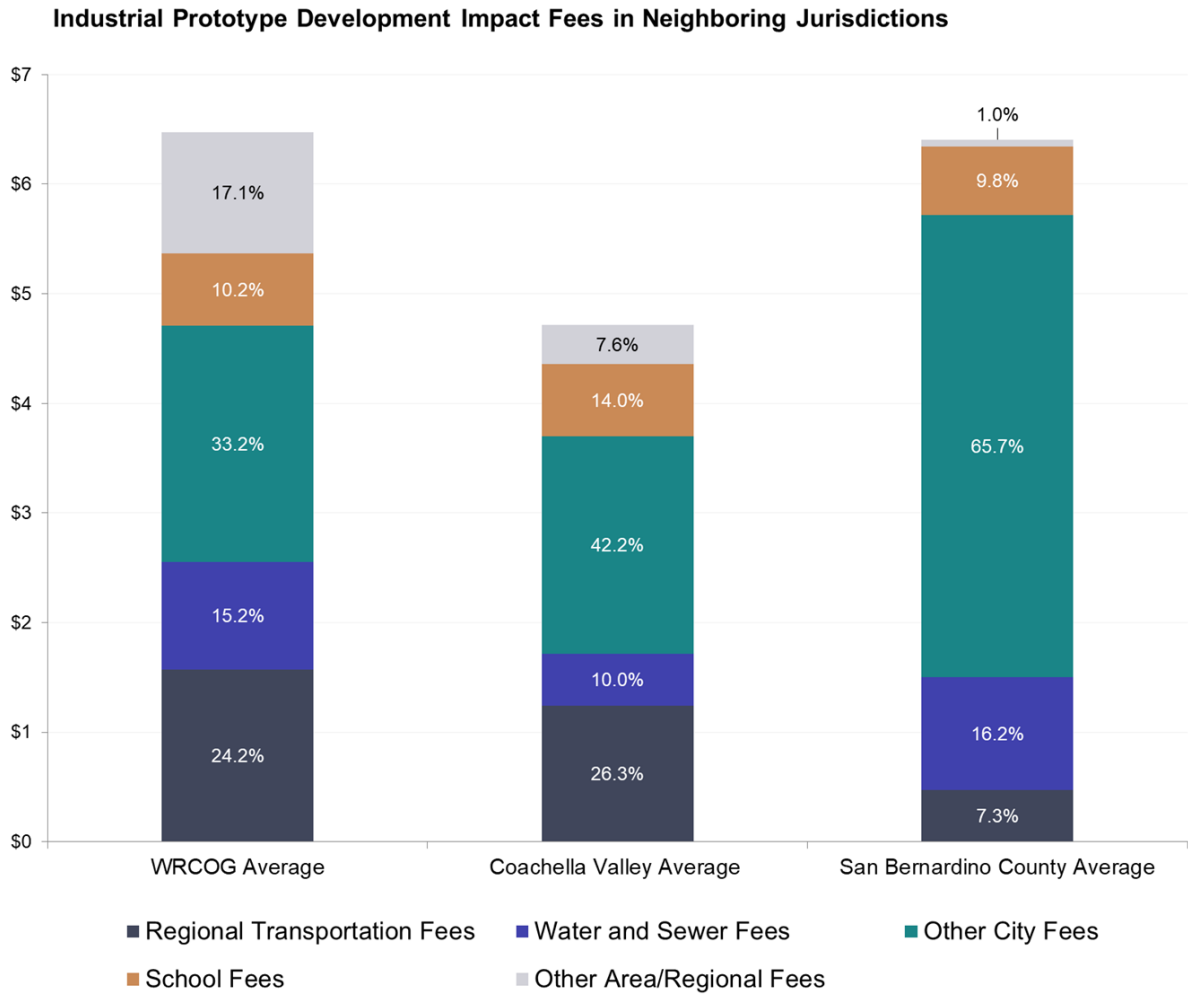


Figure 10 Average Industrial Development Impact Fee Costs and Proportions in Neighboring Jurisdictions



3. Development Impact Fees and Development Costs

This chapter evaluates development impact fees, including the TUMF, in Western Riverside County in the context of overall development costs. The first section below provides an overview of the complex factors that influence decisions to develop, one of which is development cost. The subsequent section describes the methodology used to estimate development costs for different land use types. The next section provides conclusions concerning the level of fees and TUMF in the context of overall costs.

It is critical to note that this analysis uses generalized development prototypes and development cost and return estimates to draw overall conclusions about development impact fees relative to development costs. This analysis does not represent a project-specific analysis as the development program, development costs, and returns associated with any individual project can vary widely. No conclusions concerning the feasibility of any specific project should be drawn from this analysis.

Economics of Development

Key Factors in New Development

The drivers of growth and development are complex and multifaceted, and market conditions influenced by broader global, national, and regional economic conditions are typically the strongest factor. Though regional and local policies (including the choice of whether and how much to charge in impact fees) will not be sufficient to attract or capture development when market conditions are poor, they can influence the feasibility and pace of development during more moderate or strong market conditions. Market strength is typically reflected by the price point or lease rate that users/homeowners/renters are willing to pay.

Developers (whether looking to do speculative development or to provide build-to-suit developments for larger users) will review a number of conditions before determining whether to move forward with site acquisition/optioning and pre-development activities. Factors will include: (1) the availability of appropriate sites, (2) the availability of/proximity to/quality of infrastructure/facilities (e.g., proximity to transportation corridors, schools, and other amenities), (3) local market strength (achievable sales prices/lease rates) in the context of competitive supply, (4) expected development costs (including land acquisition costs, construction materials and labor costs, the availability and costs of financing, and development impact fees, among others), and, (5) where sites are unentitled, the entitlement risk.

When the strength of market demand for new residential and nonresidential development is sufficient, it typically spurs more detailed review and evaluation of sites by developers. Even in cases where market factors look strong, there is a complex balance between development revenues, development costs, land costs, and required developer returns that must be achieved

to catalyze new development. Modest fluctuations in development revenues (i.e., market prices), development costs (materials, labor costs, etc.), and landowner expectations (perceived value of land) can all affect development decisions as can assessments of entitlement risk and complexity, where entitlements are still required.

While many of these factors, such as the price of steel, the complexities of CEQA, the market for labor, and land values, are outside of the control of local public agencies, development impact fees represent one factor that can be adjusted at the local level. That said, given limited sources of revenue for local jurisdictions, there are policy tradeoffs to not charging development impact fees, especially as they can have long-term influence on other factors that influence market demand, including local infrastructure/amenities, transportation connections to job centers, and school district quality.

Methodology

Every development project is different and will have different development costs. For the purposes of this analysis, EPS considered the same set of land use prototypes as for the fee review and comparison and developed an illustrative estimate of the full set of development costs. The steps taken in developing the development cost estimates are described in the subsections below.

Land Uses Evaluated

The development cost evaluation was completed for the same development prototypes as used in the estimation of development impact fees described in **Chapter 2**:

- Residential Single-family Development – Single-family homes in a 50-unit subdivision
- Residential Multifamily Development – Multifamily apartments in a 200-unit building
- Industrial Development – Industrial space in a 265,000 square foot “high cube” building
- Office Development – Office space in a 20,000 square foot office building
- Retail Development – Retail space in a 10,000 square foot retail building

Development Cost Estimates

An illustrative static pro forma structure was developed. The pro forma incorporated different categories of development costs (see below). It also considered potential land values/acquisition costs based on a residual land value approach that considered potential development values, subtracted direct and indirect development costs and developer return requirements, and indicated a potential residual land value. The development values were refined based on available market data ranges and the need to generate a land value of an appropriate level to support land acquisition and new development. Available information on land transactions was also reviewed. As noted above, this analysis is designed to provide overall insights on general economic relationships and does not draw conclusions concerning the feasibility of individual projects.

It is also important to note that the pro formas developed were specifically configured to represent a potentially feasible set of relationships, in terms of revenues, costs, and returns. This allows for consideration of development impact fees in the context of illustrative projects that would make sense to undertake. To the extent, development costs/returns are higher than those indicated – a reality which could certainly be true for many projects – development values would need to be higher or feasibility is not likely to be attained. To the extent, this is true, development impact fees as a proportion of development costs/returns would be lower than those shown.

In this study, major cost categories were revised from the 2018-19 Study, including direct construction costs, land costs, and development impact fees.

- **Direct Construction Costs** – Site Work/Improvements and Vertical Construction Costs. Estimates were taken from Marshal & Swift (a construction cost data provider) estimates, available pro formas, and information from developers where available.
- **Indirect Costs** – Architecture and Engineering Costs, Sales and Marketing, Financing, Development Impact Fee, and other soft costs. Estimates were taken from Marshal & Swift, the WRCOG Fee Comparison, available pro formas, and information from developers where available.
- **Developer Return Requirements** – Developer return requirements were set to be equal to between 9 and 10 percent of development value for all land uses. This represented between 10 and 20 percent of direct and indirect construction costs consistent with typical developer hurdle returns.
- **Land Costs** – Land costs were based on the estimated residual land values when costs and returns were subtracted from estimates of development value and/or information on actual land transactions. Land costs as a percent of development value were reviewed to make sure they fell within a viable range.

Results

As context for the description of the results of this analysis, it is worth repeating that there will be considerable variation throughout Western Riverside County in terms of different development cost components and overall development costs. On an average/illustrative basis, overall development costs included in this analysis may be conservative as they do not include union labor costs and may be conservative with regard to entitlement costs. Given that the focus of this analysis is on the relationship between development impact fees and total development costs, an underestimate in total development costs would mean that the proportionate significance of impact fees has been overestimated.

It is again important to note that the analysis shown here is not an evaluation of development feasibility. Such an analysis would require a more-location specific analysis and is highly dependent on site characteristics, local market conditions, and site land values, among other factors.

Table 12 summarizes the estimated development costs/returns on a per residential unit and per Nonresidential building square foot basis. **Table 13** converts the cost estimates into percent allocations out of the total development/return. It should be noted that the total cost/return (equivalent to the 100 percent) equals the sum of direct and indirect costs, estimated land costs, and required development return. This total cost/return is equivalent to the sales prices/capitalized building value a developer would need to command to cover all costs/return requirements. To the extent, actual costs are higher (e.g., higher land costs or construction costs), the achievable sales prices/capitalized lease rates would also need to be higher.

Table 12 Average Development Cost and Return Estimates by Development Prototype

Development Costs, Land Values, and Return	Single Family (per Unit)	Multifamily (per Unit)	Industrial (per Sq.Ft)	Retail (per Sq.Ft)	Office (per Sq.Ft)
<u>DIRECT</u>					
Basic Site Work/ Lot Improvement	\$30,000	\$9,257	\$11.50	\$25.00	\$14.29
Direct Construction Cost	<u>\$302,400</u>	<u>\$220,350</u>	<u>\$80.00</u>	<u>\$158.00</u>	<u>\$203.00</u>
Hard Cost Total	\$332,400	\$229,607	\$91.50	\$183.00	\$217.29
<u>INDIRECT</u>					
TUMF	\$10,104	\$6,580	\$1.57	\$5.40	\$2.45
Other Development Impact Fees	\$46,974	\$25,519	\$4.91	\$19.87	\$14.59
Other Soft Costs	<u>\$74,420</u>	<u>\$53,791</u>	<u>\$18.30</u>	<u>\$35.46</u>	<u>\$44.34</u>
Soft Cost Total	\$131,498	\$85,890	\$24.78	\$60.73	\$61.38
Total Direct and Indirect Costs:	\$463,898	\$315,497	\$116.28	\$243.73	\$278.66
Developer Return Requirement	\$63,800	\$40,863	\$15.00	\$34.61	\$38.18
Land Value	\$110,302	\$52,269	\$33.80	\$95.93	\$45.70
TOTAL COST/RETURN	\$638,000	\$408,629	\$165.08	\$374.27	\$362.54

* Assumes generally feasible market conditions (i.e. ability to generate developer return and positive land value).

Table 13 Proportional Development Costs and Returns by Development Prototype

Development Costs, Land Values, and Return	Single Family	Multifamily	Industrial	Retail	Office
DIRECT					
Basic Site Work/ Lot Improvement	4.7%	2.3%	7.0%	6.7%	3.9%
Direct Construction Cost	<u>47.4%</u>	<u>53.9%</u>	<u>48.5%</u>	<u>42.2%</u>	<u>56.0%</u>
Hard Cost Total	52.1%	56.2%	55.4%	48.9%	59.9%
INDIRECT					
TUMF	1.6%	1.6%	1.0%	1.4%	0.7%
Other Development Impact Fees	7.4%	6.2%	3.0%	5.3%	4.0%
Other Soft Costs	<u>11.7%</u>	<u>13.2%</u>	<u>11.1%</u>	<u>9.5%</u>	<u>12.2%</u>
Soft Cost Total	20.6%	21.0%	15.0%	16.2%	16.9%
Total Direct and Indirect Costs:	72.7%	77.2%	70.4%	65.1%	76.9%
Developer Return Requirement	10.0%	10.0%	9.1%	9.2%	10.5%
Land Value	17.3%	12.8%	20.5%	25.6%	12.6%
TOTAL COST/RETURN (%)	100.0%	100.0%	100.0%	100.0%	100.0%

* Assumes generally feasible market conditions (i.e. ability to generate developer return and positive land value).

Key findings include:

- Direct construction costs represent the largest proportion of total development costs/returns, typically followed by other land costs, other soft costs (collectively), developer returns, and development impact fees.** Unsurprisingly, direct construction costs are the largest cost, representing between 42.2 percent and 56 percent of total costs/returns for the prototypes evaluated. Land costs are likely to be most variable, and depending on circumstance, range from 12.6 percent to 25.6 percent for the prototypes. Other soft costs collectively are the next highest component, though their subcomponents (not shown), such as sales and marketing, architecture and engineering, financing costs, are smaller. The expected hurdle developer return at 9 to 10 percent is the next highest factor. The range for total development impact fees is below all these other ranges, though when indirect costs are considered individually development impact fees are larger than other subcomponents.
- Total development impact fees represent between 4 percent and 8.9 percent of total development costs/returns for the prototype feasible projects.** Total development impact fees represent 8.9 percent and 7.9 percent of total development costs/returns respectively for single-family and multifamily developments, respectively. As discussed in Chapter 2, these capital facilities fees included water and sewer fees, school district fees, other local jurisdiction fees, TUMF, and other agency/subarea fees. As is common, nonresidential development impact fees are lower as a percent though show a

significant range from 4 percent for industrial development, to 4.7 percent for office development, to 6.8 percent for retail development. Since the 2018-19 Study, the percent of costs that the development impact fees represent has seen a minimal change. The largest change was seen in the proportion of fees on multifamily projects, which decreased by 1 percentage point.

- **TUMF represent between 0.7 percent and 1.6 percent of total development costs/returns for the prototype feasible projects.** As a proportion of overall development costs, TUMF represent 1.6 percent total residential development costs for both single-family and multifamily. For nonresidential uses there is greater variation with TUMF representing 0.7 percent of total costs for office development, 1 percent of total costs for industrial development, and 1.4 percent of total costs for retail development. TUMF represent between 14.4 percent and 24.2 percent of total development impact fees, on average, as indicated in the Fee Comparison with the highest ratios for industrial development and lowest for office development.

4. Conclusions

The Western Riverside Council of Governments (WRCOG) commissioned this and prior studies to provide increased regional understanding of development impact fees on new development in Western Riverside County. It is common practice for new and updated Development Impact Fee Nexus Studies to be accompanied by some consideration of impact fees in neighboring and peer communities and, less frequently, by consideration of impact fees in the context of overall development costs and economics. This is true where individual jurisdictions are introducing/updating a single development impact fee category (e.g. transportation or parks) as well as when undertaking a more comprehensive update to multiple fee categories.

Following the first study in 2016, WRCOG recommended that this report and study be updated periodically to ensure the regional understanding of the region's impact fees remains current in the context of: (1) frequent adjustments to fee levels by individual jurisdictions, (2) changing development cost and economic conditions, and (3) less frequent, but highly significant changes in State law that affect the use and availability of other public financing tools.

The development of this updated study follows that recommendation and represents the second effort to bring the original study up to date.

APPENDIX A: Development Prototypes



Single Family Prototype

- Reflects median home size for Western Riverside County home sales since 2014

Product Type:	Single Family Detached Unit
Development Type:	Residential Subdivision
No. of Acres:	10 Acres
No. of Units:	50 Units
Building Sq.Ft.	2,700 Sq.Ft.
No. of Bedrooms:	4
No. of Bathrooms:	3
Garage Space (Sq.Ft.):	500 Sq.Ft.
Habitable Space (Sq.Ft.):	2,200 Sq.Ft.
Lot Size:	7,200 Sq.Ft.
Density:	5 DU/AC
Lot Width:	60 Ft.
Lot Depth:	120 Ft.
Total Lot Dimensions (Sq.Ft.):	7,200 Sq.Ft.
Water Meter Size	One 1 Inch Meter



Example Prototype Home, City of Riverside

Multi-Family Prototype

- Reflects median building size for multi-family developments since 2010



Example Prototype Multi-Family Development, City of Temecula

Product Type:	Multi Family Apartment Unit
Development Type:	Multi Family Apartment Building
Number of Acres:	10 Acres
Apartment Building Square Feet:	260,000 Sq.Ft.
FAR:	0.60
Number of Stories:	3
Dwelling Units:	200
Density:	20.0 DU/AC
Average Unit Size:	1,100
Water Meter Sizes*:	Eight 2 inch Meters
Roof Area:	86,667 Sq.Ft.
Lot Width:	515.0 Ft.
Lot Depth:	846.6 Ft.

*Note: Assumption is for analytical simplicity. Different assumptions are used where recommended by individual jurisdictions.

Industrial Prototype

- Reflects median building size for industrial developments since 2010

Product Type:	Warehouse/ Distribution
Criteria:	Meets criteria for High-Cube
No. of Acres:	15.2 Acres
Rentable Square Feet:	265,000 Sq.Ft.
FAR:	0.4
Water Meter Sizes:	One 2 Inch Meter
Roof Area:	265,000 Sq.Ft.
Lot Width:	813.7 Ft.
Lot Depth:	813.7 Ft.



Example Prototype Industrial Development, City of Perris

Retail Prototype

- Reflects building size for retail developments since 2010



Example Prototype Retail Development, City of Hemet

Product Type:	Retail Building
No. of Acres:	1.15 Acres
Rentable Square Feet:	10,000 Sq.Ft.
FAR:	0.2
No. of Stories:	1
Water Meter Sizes:	One 2 Inch Meter
Roof Area:	10,000 Sq.Ft.
Lot Width:	223.6 Ft.
Lot Depth:	223.6 Ft.

Office Prototype

- Reflects median building size for office developments since 2010

Product Type:	Office Building
Number of Acres:	1.3 Acres
Rentable Square Feet:	20,000 Sq.Ft.
FAR:	0.35
No. of Stories:	2
Water Meter Sizes:	One 2 Inch Meter
Roof Area:	10,000 Sq.Ft.
Lot Width:	239.0 Ft.
Lot Depth:	239.0 Ft.



Example Prototype Office Development, City of Hemet

APPENDIX B:

Location & Service Provider Assumptions



Study Location and Service Provider Assumptions

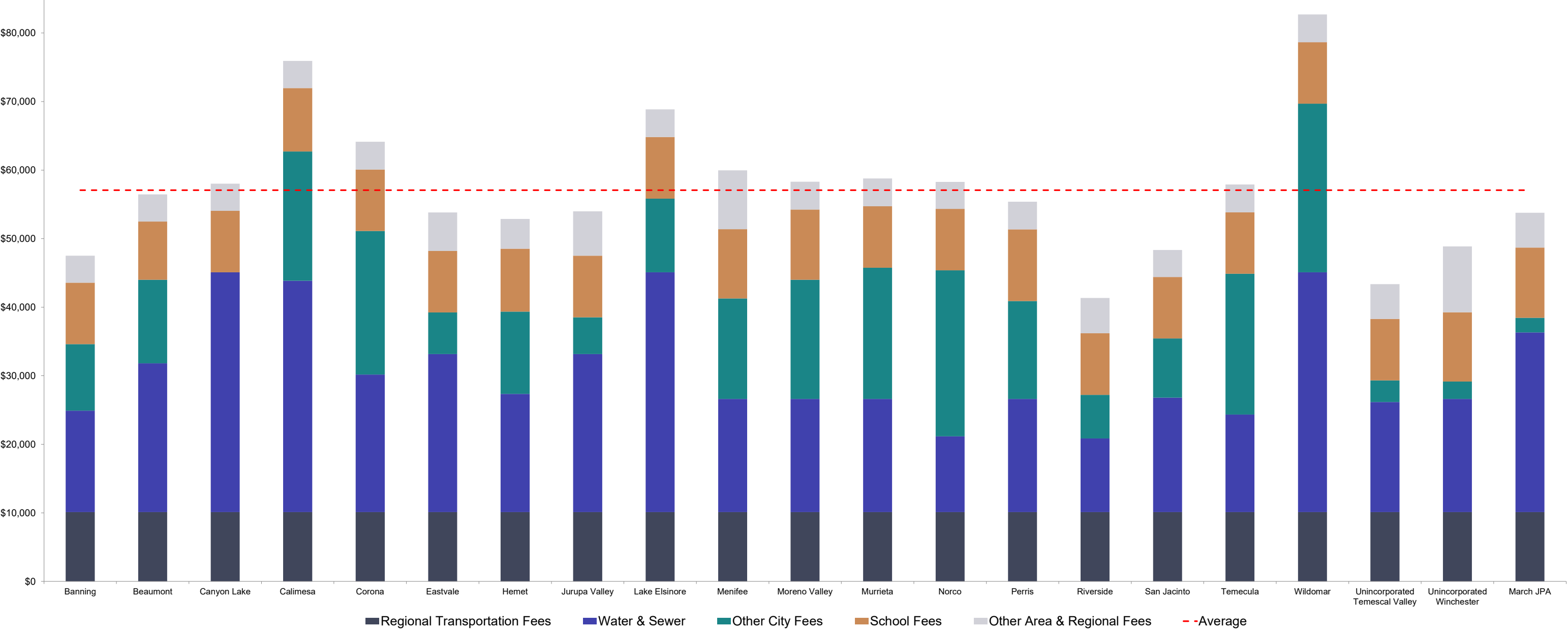
City / Location	School District	Water District	Sewer District
<u>Western Riverside Council of Governments</u>			
1 Banning	Banning Unified School District	City of Banning	City of Banning
2 Beaumont	Beaumont Unified School District	Beaumont-Cherry Valley Water District	City of Beaumont Sewer & Refuse Service
3 Calimesa	Yucaipa- Calimesa Joint Unified School District	Yucaipa Valley Water District	Yucaipa Valley Water District
4 Canyon Lake	Lake Elsinore Unified School District	Elsinore Valley Municipal Water District	Elsinore Valley Municipal Water District
5 Corona	Corona-Norco Unified School District	City of Corona	City of Corona
6 Eastvale	Corona-Norco Unified School District	Jurupa Community Services District (JCSD)	Jurupa Community Services District (JCSD)
7 Hemet	Hemet Unified School District	Eastern Municipal Water District (EMWD)	Eastern Municipal Water District (EMWD)
8 Jurupa Valley	Jurupa Unified School District	Jurupa Community Services District (JCSD)	Jurupa Community Services District (JCSD)
9 Lake Elsinore	Lake Elsinore Unified School District	Elsinore Valley Municipal Water District	Elsinore Valley Municipal Water District
10 Menifee	Menifee Union (Elementary) & Perris Union (High)	Eastern Municipal Water District (EMWD)	Eastern Municipal Water District (EMWD)
11 Moreno Valley	Moreno Valley Unified School District	Eastern Municipal Water District (EMWD)	Eastern Municipal Water District (EMWD)
12 Murrieta	Murrieta Valley Unified School District	Eastern Municipal Water District (EMWD)	Eastern Municipal Water District (EMWD)
13 Norco	Corona-Norco Unified School District	City of Norco	City of Norco
14 Perris	Perris Union High & Perris Union Elementary	Eastern Municipal Water District (EMWD)	Eastern Municipal Water District
15 Riverside	Riverside Unified School District	City of Riverside	City of Riverside
16 San Jacinto	San Jacinto Unified School District	Eastern Municipal Water District	Eastern Municipal Water District (EMWD)
17 Temecula	Temecula Valley Unified School District	Rancho California Water District	Eastern Municipal Water District (EMWD)
18 Wildomar	Lake Elsinore Unified School District	Elsinore Valley Municipal Water District	Elsinore Valley Municipal Water District
19 Unincorporated Temescal Valley	Corona-Norco Unified School District	Temescal Valley Water District	Temescal Valley Water District
20 Unincorporated Winchester	Menifee Union (Elementary) & Perris Union (High)	Eastern Municipal Water District (EMWD)	Eastern Municipal Water District (EMWD)
21 March JPA	Moreno Valley Unified School District	Western Municipal Water District (WMWD)	Western Municipal Water District (WMWD)
<u>San Bernardino County</u>			
1 Fontana	Fontana unified School District	Fontana Water Company	City of Fontana
2 Yucaipa	Yucaipa- Calimesa Joint Unified School District	Yucaipa Valley Water District	Yucaipa Valley Water District
3 San Bernardino	San Bernadino City Unified School District	East Valley Water District	San Bernardino Municipal Water Department
4 Ontario	Ontario-Montclier School District	Inland Empire Utilities Agency	Inland Empire Utilities Agency (formerly Ontario Municipal Utilities Company)
5 Chino	Chino Valley Unified School District	Inland Empire Utilities Agency	Inland Empire Utilities Agency (formerly City of Chino Public Works Department)
6 Rialto	Rialto Unified School District	Rialto Water Services	Rialto Water Services
<u>Coachella Valley Association of Governments</u>			
1 Indio	Desert Sands Unified School District	Indio Water Authority	Valley Sanitary District
2 Palm Desert	Desert Sands Unified School District	Coachella Valley Water District	Coachella Valley Water District
3 Palm Spring	Palm Springs Unified School District	Desert Water Agency	Desert Water Agency

APPENDIX C:

Development Impact Fee Comparison by WRCOG Jurisdictions

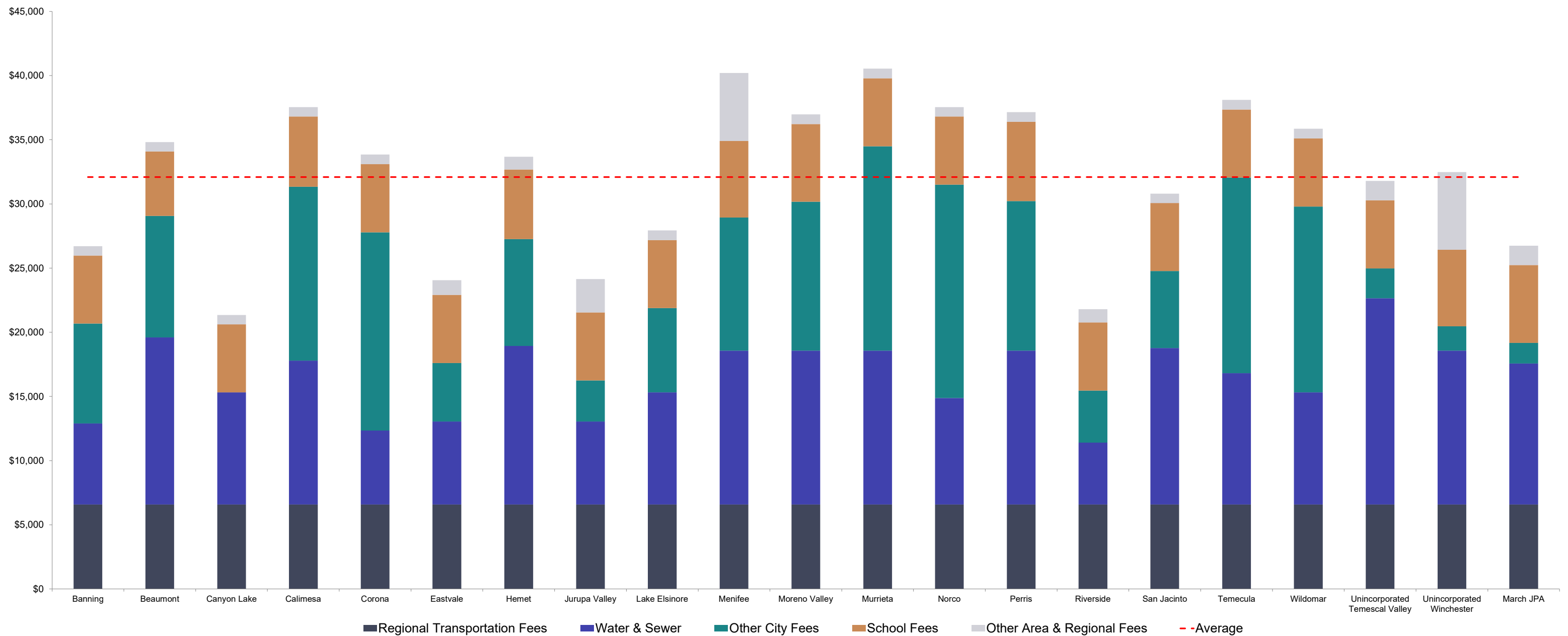


Single Family Prototype
Development Fees by Jurisdiction (Per Unit)



Fee estimates for specified development prototypes as of 2022. Actual fees will vary based on project specifics and any fee updates.
"Other Area Fees/ Regional Fees" include, but are not limited to, roads and bridges, regional parks, trails, multiservice center fees, area specific fees, and habitat mitigation fees.

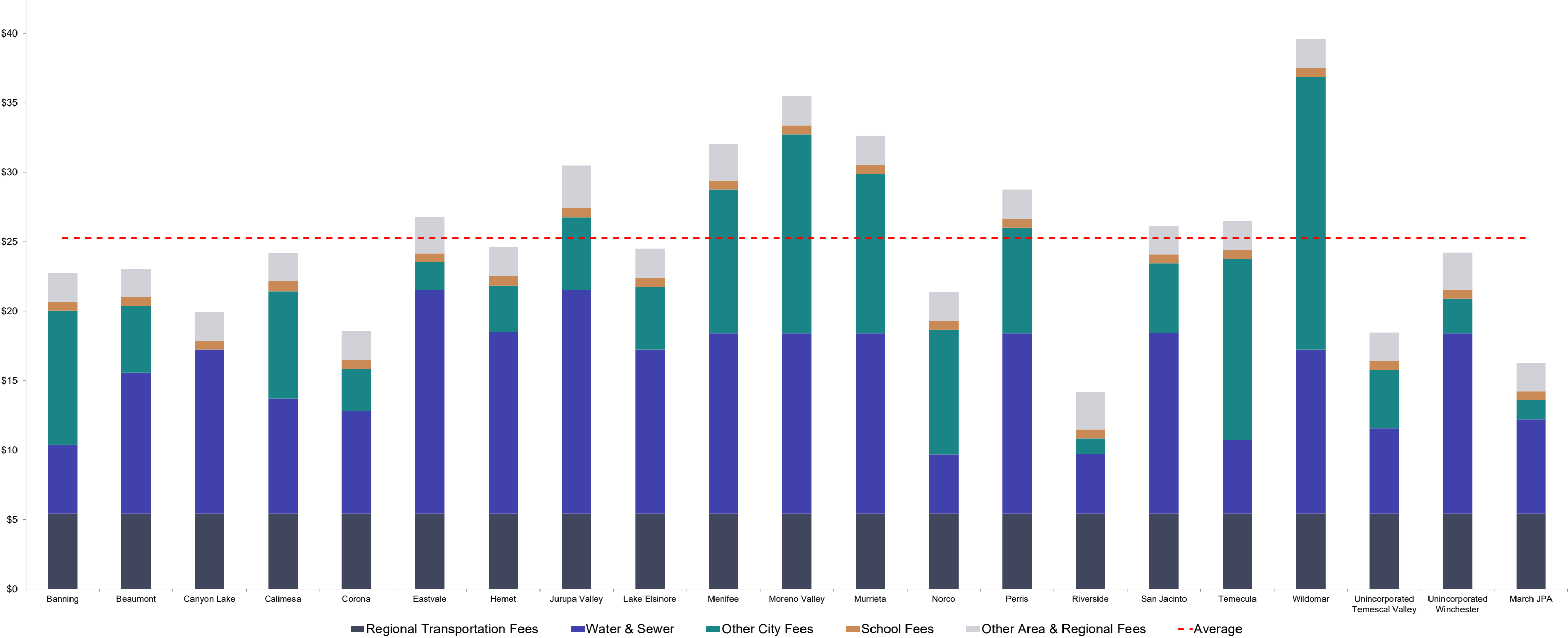
**Multifamily Prototype
Development Fees by Jurisdiction (Per Unit)**



Fee estimates for specified development prototypes as of 2022. Actual fees will vary based on project specifics and any fee updates.

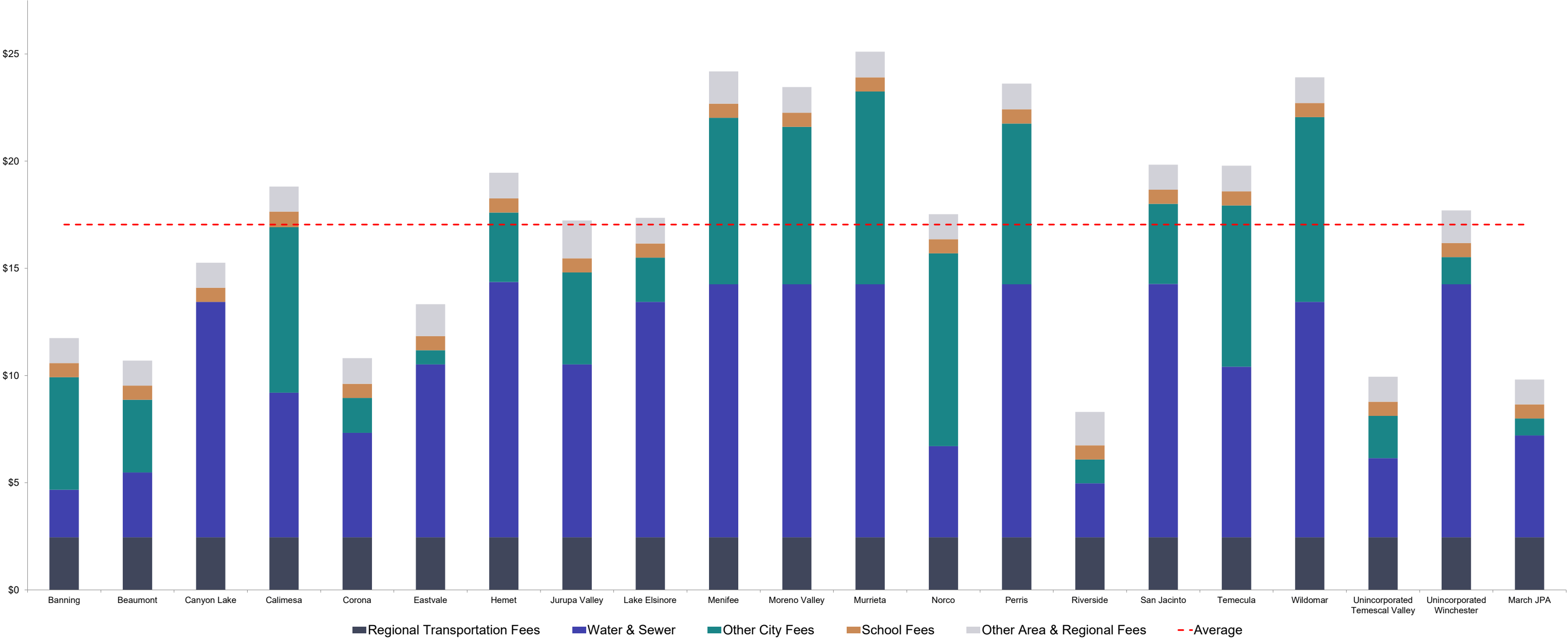
"Other Area Fees/ Regional Fees" include, but are not limited to, roads and bridges, regional parks, trails, multiservice center fees, area specific fees, and habitat mitigation fees.

**Retail Prototype
Development Fees by Jurisdiction (Per Square Foot)**



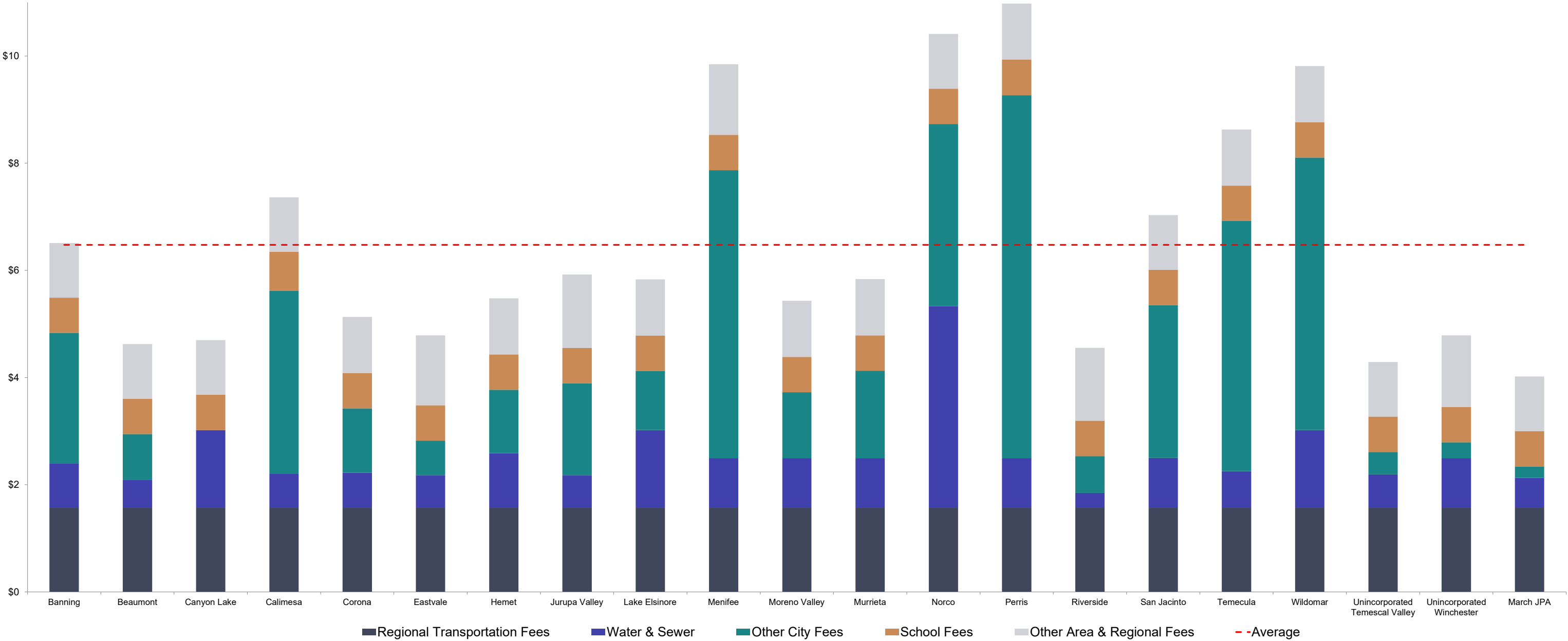
Fee estimates for specified development prototypes as of 2022. Actual fees will vary based on project specifics and any fee updates.
"Other Area Fees/ Regional Fees" include, but are not limited to, roads and bridges, regional parks, trails, multiservice center fees, area specific fees, and habitat mitigation fees.

Office Prototype
Development Fees by Jurisdiction (Per Square Foot)



Fee estimates for specified development prototypes as of 2022. Actual fees will vary based on project specifics and any fee updates.
"Other Area Fees/ Regional Fees" include, but are not limited to, roads and bridges, regional parks, trails, multiservice center fees, area specific fees, and habitat mitigation fees.

Industrial Prototype
Development Fees by Jurisdiction (Per Square Foot)



Fee estimates for specified development prototypes as of 2022. Actual fees will vary based on project specifics and any fee updates.
"Other Area Fees/ Regional Fees" include, but are not limited to, regional parks, trails, multiservice center fees, area specific fees, and habitat mitigation fees.