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SCHOOL DISTRICT OF MANATEE COUNTY

June 6, 2019

Mr. Travis Vengroff
One Stop Housing
8440 N Tamiami Trail
Sarasota, FL 34243

Independent Impact Fee Study – Robin's Apartments

Dear Mr. Vengroff:

My staff has collaborated with school district legal counsel and our impact fee consultant to review the independent impact fee study for Robin's Apartments. Pursuant to my authority provided per Sec. 2-29-85(c) of Ordinance 16-03 (School Impact Fee Ordinance) the independent study is approved based on the recording of a Land Use Restriction Agreement within six months of the date of this letter, unless extended in writing by me. The LURA shall contain the following information:

1. There is a maximum of two occupants per dwelling unit; provided, however, children under the age of 4 years of age (prior to September 1st of any given year) shall not be counted towards the occupancy count for a unit. No more than one occupant of a unit shall be under the age of 18.
2. In the event of a violation of the restrictions of the LURA, the owners of Robin's Apartments, upon written notification, shall have thirty (30) days to bring the operations into compliance with the LURA. Failing to do so within the thirty (30) day period, the difference between the full amount of the fees at the time of the violation and the amount previously paid under the Independent Impact Fee Analysis shall become due and payable by the owners and shall be paid within thirty (30) days in the manner then in effect for payment of such impact fees.
3. In the event the LURA expires or is terminated for any reason, the difference between the full amount of the fees at the time of expiration or termination and the amount previously paid under the Independent Impact Fee Analysis shall become due and payable by the owners and shall be paid within thirty (30) days in the manner then in effect for payment of such impact fees, unless the County, the School Board, and the owners agree to enter into a new LURA.
4. The LURA shall run with the land and shall be recorded in the public records of Manatee County, Florida.
5. The LURA shall be for the benefit of and can be enforced by the School Board and the County.

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Robin's Apartments repurposed an older motel into 240 efficiency apartments, plus a one-bedroom manager's apartment. You have represented that a land use restriction agreement will be recorded with the County that will restrict units to no more than two residents each, with an exception for children under four years of age (prior to September 1st of any given year), which are not included in the occupancy count.

Manatee County's educational impact fee ordinance (see Sec. 2-29-81 et. Seq.) lists the impact fee for a multi-family unit to be \$3,502, regardless of size of unit. Section 2-29-85(c) of the ordinance also provides that in lieu of utilizing the fee schedule, an independent fee calculation may be performed. You retained the services of Duncan Associates to prepare the alternative impact fee calculation. Duncan Associates is a nationally respected firm that specializes in impact fee calculations.

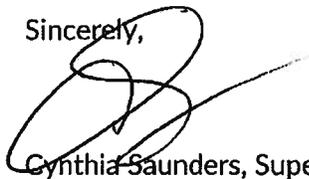
The U.S. Census Bureau's 2017 American Community Survey (ACS) utilized by Duncan Associates is the best data available to conduct the type of demographic analysis required for the alternative fee calculation. This is the same data source utilized by the School District's Impact Fee Consultant (TischlerBise) to calculate the public school generation rates by housing unit for the 2017 educational impact fee study.

The Duncan Associates methodology and analysis appropriately recognizes that the 2017 ACS data has an insufficient sample size for efficiency units and combines efficiency units with one-bedroom units to produce a sufficient sample size of 501 units, which can be deemed statistically-reliable for this evaluation. Further, the analysis and methodology recognize the ACS data does not include the square footage of the unit and appropriately uses *total* apartment units (occupied or unoccupied) with no more than one bedroom and no more than two occupants. When this is compared to the occupancy rate, the student generation rate can be determined.

In summary, the Duncan Associates methodology and data source is appropriate when combined with a LURA containing the information herein to warrant a fee per unit of \$138.00. Failure to record a LURA containing the information herein will require payment of the full amount of fees for multi-family units.

Please let me know if you have any questions, or if I can be of additional assistance.

Sincerely,



Cynthia Saunders, Superintendent

Cc: Mike Pendley
Manatee County Impact Fee Coordinator