

**UPDATED COMMERCIAL LINKAGE FEE
NEXUS STUDY**

Submitted To

San Luis Obispo County

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TABLE OF CONTENTS
SAN LUIS OBISPO COUNTY COMMERCIAL LINKAGE FEE
NEXUS STUDY

EXECUTIVE SUMMARY 1

INTRODUCTION..... 2

CALCULATION OF MAXIMUM LINKAGE FEE 3

POTENTIAL REVENUES FROM A LINKAGE FEE 7

POLICY CONSIDERATIONS 8

ANNUAL ADJUSTMENT MECHANISM..... 12

APPENDIX: NEXUS CALCULATION TABLE..... A-1

SAN LUIS OBISPO COUNTY UPDATED COMMERCIAL LINKAGE FEE NEXUS STUDY

EXECUTIVE SUMMARY

San Luis Obispo County has not updated its Housing Impact Fee levied on new non-residential development in five years. The requirement for this fee is established in the County's Inclusionary Housing Ordinance. As part of a review of the County's Inclusionary Ordinance, the County will consider updating its Housing Impact Fee charged on new non-residential development. In order to provide a rational nexus (connection) between a housing impact fee and non-residential development, it is necessary to undertake a Commercial Linkage Fee Nexus Analysis. This Nexus Study provides this analysis and is a companion study to the *Housing Impact Fee Nexus Study* also prepared for the Inclusionary Housing Program.

The purpose of this nexus analysis is to quantify the increase in demand for affordable housing that accompanies new non-residential development. It is assumed that there will be a net gain in employment when new commercial space is built. The ability of new employees to pay for housing costs is linked to their occupations (and hence salaries). Additional housing units will be needed for those employees who will both work and live in the unincorporated area. Housing units at all price levels are needed. Given anticipated incomes, there may be an affordability "gap" between what some households can afford to pay (to rent or to buy) and the actual costs of new residential development. This "gap" provides the basis for an updated fee calculation.

The current Inclusionary Ordinance specifies five land uses for which fees are required. These uses include commercial service (retail), commercial service (office), hotel/motel, industrial/warehouse, and other non-residential (which covers uses such as indoor and outdoor recreation areas as well as marinas).

The fee amounts calculated for this study are directly related to employment densities. Employment densities are used to estimate the number of employees that will work in a new commercial development. These densities are based on the number of square feet per employee which varies across commercial prototypes. For example, there are fewer industrial employees in a given amount of space than there are workers in office buildings. Consequently, the non-residential development housing impact fee for office space is higher than the fee for industrial space. Because of variation in employment densities, a separate fee is calculated for each property use that is subject to a commercial development housing impact fee.

Attachment C – Updated Commercial Linkage Fee Nexus Study

Table ES-1 below presents the maximum fee amounts by land use category, as well as three reduced fee amounts ranging from 20% to five percent of the maximum fee amount. While a Nexus Study establishes a maximum fee level for the County’s consideration, the County can select a lower fee amount, but it cannot select a higher fee amount. Assuming that the County still supports a fee that is defined as five percent of the maximum fee justified in this nexus study, the fee changes range from a decrease of 13% (for office uses) to an increase of 53% for Hotel/Motel and Other Non-Residential Uses.¹

Table ES-1: San Luis Obispo County Potential Non-Residential Development Housing Impact Fees per Square Foot

Property Type	Commercial/ Retail	Commercial/ Office	Hotel/ Motel	Industrial	Other Non- Residential
Maximum Linkage Fee Per SF	\$64.80	\$45.00	\$68.00	\$27.00	\$59.40
20% of Maximum Fee	\$12.96	\$9.00	\$13.60	\$5.40	\$11.88
10% of Maximum Fee	\$6.48	\$4.50	\$6.80	\$2.70	\$5.94
5% of Maximum Fee	\$3.24	\$2.25	\$3.40	\$1.35	\$2.97
2012 Fees	\$2.22	\$2.58	\$2.22	\$1.03	\$1.94
Ratio of Revised Fees at 5% with 2012 Fees	146%	87%	153%	131%	153%
Percent Change (5% of Maximum Fee Compared with 2012 Fees)	46%	-13%	53%	31%	53%

Source: Vernazza Wolfe Associates Inc.

The next step in the process is for public officials in the County to update its non-residential housing impact fee. In making this decision, the County will consider many factors, such as commercial development housing impact fees in neighboring jurisdictions, as well as the overall County fees already charged on non-residential development.

INTRODUCTION

A commercial linkage fee is a housing impact fee that is charged on new, non-residential development. This fee is justified on the basis that a portion of the new employees who will work in new space will require affordable housing. The funds raised by this fee are deposited into a housing trust fund specifically reserved to support affordable housing. The imposition of a non-residential housing impact fee is one way that commercial developers can contribute to

¹ The explanation for a decrease in the office housing impact fee is explained in the body of this report.

Attachment C – Updated Commercial Linkage Fee Nexus Study

solving housing affordability problems generated by employment growth due to new commercial development.

The County established a non-residential housing impact fee in its 2008 Inclusionary Ordinance. This Study updates this fee. In order to update the fee, a commercial linkage nexus study is required under AB 1600 (Section 66001 et seq. of the Government Code). A nexus study establishes and quantifies a causal link or “nexus” between new commercial/industrial development and the need for additional housing affordable to new workers.

CALCULATION OF MAXIMUM LINKAGE FEE

The basic approach in quantifying housing impacts from new development is to estimate the number of additional housing units that will be needed to accommodate growth in employment. Housing units at all price levels are needed and are linked to the occupations and, thus, salaries of new employees. Given anticipated worker (and household) incomes, there may be an “affordability gap” between what households can afford to pay to rent or to purchase housing and the actual costs of new, modest housing. This “gap” provides the basis for the fee calculation. To reach this point, several steps are required. These steps begin with establishing several assumptions, and then, based on these assumptions, the Nexus calculations are performed.

Nexus Study Assumptions

This Study relies on many of the same assumptions that applied to the 2007 Study. There are also some changes to the original assumptions.

Retained Assumptions

- Five property types
- Property sizes
- Employment densities
- Average number of wage-earners per household
- Income cut-off (160% AMI)

Attachment C – Updated Commercial Linkage Fee Nexus Study

New Assumptions for 2012 Study

- Updated percentage of new employees that would live and work in unincorporated San Luis Obispo County (39% of new employees. (The prior study used 37.6 %.)
- Updated average household size of two used to determine income cut-off. (Prior study used three.)²
- Improved income information is now based on the occupations of employees that will work in the new space and their associated incomes. The occupational distribution of employment by land use is based on the 2007 National Industry-Specific Occupational Employment for selected Industries/NAICS codes. Associated incomes are from 2012 BLS data. (The prior study relied on the current income distribution of households in the unincorporated County and assumed new worker households would have the same income distribution as the existing population.)

Non-Residential Housing Impact Fee Calculations by Land Use

In order to calculate the maximum non-residential development housing impact fee, several computations are necessary. These are listed below in the order required.

- Determine what non-residential property types to consider.
- Calculate appropriate employment density factors.
- Develop a prototype project size for each development type.
- Calculate the number of employees who will work in the new space of each development prototype.
- Estimate the number of new employees who will move to unincorporated San Luis Obispo County.³
- Estimate the number of new households that these employees represent.
- Determine the percentage of new households at or below 160% Area Median Income (AMI).
- Estimate the housing affordability gap based on the difference between the costs of new housing and affordable housing prices.⁴

² According to 2010 population estimates provided by SLOCOG, the average household size for the unincorporated area is 2.15 persons per household.

³ This analysis does not consider unemployment when estimating the number of new employees that will work in the newly constructed space. Although unemployment is higher in 2012 in comparison to the rate in 2008 when the Ordinance was passed, there is not always a match of unemployed workers' job skills and employment history with the new job openings. The earlier study also did not factor in unemployment when estimating job impacts.

Attachment C – Updated Commercial Linkage Fee Nexus Study

- Estimate the total affordability housing gap amount for new households for each building prototype by multiplying the number of new households by the average housing affordability gap.
- Estimate a maximum non-residential housing impact fee per square foot (SF) by dividing through the total housing affordability gap by the prototype building size for each land use.

Table 1 presents the results of these computations. According to these results, five percent of the maximum SF fee ranges from a high of \$3.40/SF for hotel/motel development to a low of \$1.35 for industrial space.⁵ The higher fees are charged for those land uses that pay lower wages (on average) to their employees.

⁴ This is the same gap as the one used in the residential nexus analysis. The explanation for this gap analysis is presented in a companion report, *Housing Impact Fee Nexus Study*.

⁵ This table provides several potential fee values, ranging from the maximum fee that could be charged, followed by 20%, 10%, and 5% of the maximum fee. Since the County adopted a policy of charging five percent of the total fee, the discussion in this report assumes that five percent of the maximum fee will continue to be county policy.

Attachment C – Updated Commercial Linkage Fee Nexus Study

Table 1: San Luis Obispo County Potential Commercial Development Housing Impact Fees per Square Foot⁶

	Commercial/ Retail	Commercial/ Office	Hotel/ Motel	Industrial	Other Non- Residential
Prototype Project Size (square feet)	20,000	12,000	54,000	12,000	20,000
Density Factors (square feet per employee)	350	300	350	750	400
Number of employees (project size divided by density factor)	57	40	154	16	50
Number of Employees Moving to Unincorporated San Luis Obispo County (39 % of total)	22	16	60	6	20
Number of Households Moving to Unincorporated San Luis Obispo County ⁷	13	9	34	4	11
Number of New Households Requiring Subsidies ⁸	12	5	34	3	11
Total Housing Affordability Gap of Households ⁹	\$1,296,000	\$540,000	\$3,672,000	\$324,000	\$1,188,000
Maximum Linkage Fee Per SF (total gap divided by building sizes of prototypes)	\$64.80	\$45.00	\$68.00	\$27.00	\$59.40
20% of Maximum Fee	\$12.96	\$9.00	\$13.60	\$5.40	\$11.88
10% of Maximum Fee	\$6.48	\$4.50	\$6.80	\$2.70	\$5.94
5% of Maximum Fee	\$3.24	\$2.25	\$3.40	\$1.35	\$2.97
2012 Fees	\$2.22	\$2.58	\$2.22	\$1.03	\$1.94

Source: Vernazza Wolfe Associates Inc.

⁶ This percentage (39%) represents the percentage of the county labor force that lives in the unincorporated area.

⁷ At the time this analysis was undertaken, the variable, average number of wage earners per household for the unincorporated area, was unavailable from the 2010 Census. Thus, this analysis used the equivalent variable from the 2000 Census. It is reasonable to consider what potential bias could be introduced through the use of an older figure, particularly since unemployment would have been higher in 2010 than in 2000. One would expect that the average number of wage earners per household would be lower in 2010 than in 2000. Since this variable is used to estimate the number of households relative to employment growth, the use of 2000 data could result in a projection of the number of households that is below what it would be if the equivalent measure was based on the 2010 Census. The number of households determines the size of the total housing affordability gap. Thus, a smaller number of households results in estimating a lower overall housing gap and hence a lower fee level. In other words, the use of 2000 Census information may result in calculating slightly lower fees.

⁸ Only those new households whose incomes are below \$96,480 are carried forward in the analysis.

⁹ The number of households requiring subsidies is multiplied by \$108,000 per household.

Attachment C – Updated Commercial Linkage Fee Nexus Study

POTENTIAL REVENUES FROM A LINKAGE FEE

The nexus calculations determine the maximum fee that can be charged. It is rare that a jurisdiction selects this maximum amount. Since affordable housing receives subsidies, such as low-income housing tax credits and other state and federal grants, it is not necessary for the linkage fees to cover the entire affordability gap which is used in the nexus calculation. In addition, jurisdictions consider the overall impact of a new fee on its existing fee structure. The goal of a development impact fee is not to discourage development, but to offset impacts from new development. The initial fee adopted in 2008 was based on five percent of the maximum fee amount. Consequently, in estimating potential revenues from a linkage fee, this Study assumes that the County adopts a fee that represents five percent of the maximum fee amount. Table 2 also provides estimates of potential revenues based on ten percent of the maximum for comparative purposes.

Table 2 presents hypothetical revenues that the County could collect from an updated fee on approved projects and compares these potential revenues to revenues that could be collected if the impact fee is not updated. Under the five percent option, total revenues would be higher, and the County could collect \$424,200, or approximately \$100,000 more than under the current fee schedule.

Table 2: Potential Commercial Linkage Fee Revenues from Recently Approved Commercial Developments (2012)

Type of Property	Square Feet (Estimated)¹⁰	Potential Fees @ 10% of Maximum	Potential Fees @ 5% of Maximum	Potential Fees Under 2012 Fee Schedule
Commercial Service (Retail) ¹¹	30,587	\$198,204	\$99,102	\$67,903
Commercial Service (Office)	11,805	\$53,123	\$26,561	\$30,457
Hotel/Motel	6,734	\$45,791	\$22,896	\$14,949
Industrial/Warehouse	202,798	\$547,555	\$273,777	\$208,882
Other, Non-Residential	625	\$3,713	\$1,856	\$1,213
Total		\$848,385	\$424,192	\$323,404

Sources: San Luis Obispo County, Department of Planning and Building, and Table 1.

¹⁰ Information on potential developments was obtained from staff at the County Department of Planning and Building. Although wineries are exempt from the Housing Impact Fee, ancillary buildings, such as offices are subject to the fee. Since many of these commercial projects are not yet under construction, the number of square feet is an estimate at this time.

¹¹ The change in how incomes are entered into the model (now based on occupations instead of average incomes) results in a lower revised SF fee for Commercial Services (Office) in comparison to the original calculations in 2007.

POLICY CONSIDERATIONS

This study provides the economic analyses required to support updated housing impact fees on non-residential developments. These analyses provide the County with the answer to the question of “What are the maximum fees that the County can adopt on new commercial developments?” However, the economic analysis does not answer the question of “What housing impact fees should the County adopt?” The conclusion of this report provides a policy context to help guide County officials in determining the actual fees.

When cities and counties consider whether to offset the full affordable housing impacts of new development or a portion of those impacts, a number of factors may be considered. For non-residential development housing impact fees, policymakers may wish to consider the following:

- How much will commercial development fees increase?
- What are the non-residential housing impact fees in neighboring jurisdictions?
- What is the relationship between revenues to be collected from the non-residential housing impact fee and the County’s overall affordable housing strategy?

San Luis Obispo County Commercial Fees for Each Building Prototype

Table 3 presents information on current impact fees charged per square foot for each of the five non-residential prototypes included in the County’s Inclusionary Housing Ordinance. This Table also includes the current non-residential development housing impact fee and the proposed fee. Table 4 provides estimates of total fees for each of the non-residential prototypes and offers a comparison of total fees with the current non-residential development housing impact fee and the updated housing impact fee. Total County fees at present with the current Housing Impact for the five building prototypes are \$XXX for the commercial (retail) building prototype; \$XXX for the commercial (office) building prototype, \$XXX for the hotel/motel prototype, \$XXX for the industrial prototype, and \$XXX for the other, non-residential prototype.¹²

Table 3 is a helpful resource for the policy discussion regarding the update of the non-residential development housing impact fee. A fee that is set too high could work to discourage development. However, as Table 3 indicates, if five percent of the maximum fee were adopted, the total fees would only be slightly higher than the 2012 fees for four land uses and actually lower than the 2012 fee charged on an office development of 12,000 SF.

¹² The fee estimates presented above represent the best approximations available from the San Luis Obispo County. County imposed fees that are not considered “impact fees” are not included here.

Attachment C – Updated Commercial Linkage Fee Nexus Study

Table 3: San Luis Obispo County Impact Fees per Square Foot

	Public Facilities	School	Road Fee	Are there other fees?	Proposed Fee (5% of Maximum)	Current Fee
Land Use						
Commercial/Retail					\$3.24	\$2.22
Commercial/Service					\$2.25	\$2.58
Industrial					\$3.40	\$2.22
Hotel/Motel					\$1.35	\$1.03
Other Non-Residential					\$2.97	\$1.94

Sources: San Luis Obispo County Department of Planning and Building and Vernazza Wolfe Associates, Inc.

Table 4: San Luis Obispo County Total Impact Fees for Five Commercial Development Prototypes

	12,000 SF Office/R&D Building	54,000 SF Hotel/Motel¹³	20,000 SF Commercial/Retail Building	12,000 SF Industrial/Manufacturing Building	20,000 SF Other Residential
Current Commercial Development Fees, <u>excluding</u> <u>Housing Impact Fees</u>					
Current Commercial Development Fees, <u>including</u> <u>Current Housing Impact Fees</u>					
Current Commercial Development Fees, <u>including</u> <u>Updated Housing Impact Fees</u>					

Sources: San Luis Obispo County Department of Planning and Building and Vernazza Wolfe Associates, Inc.

Attachment C – Updated Commercial Linkage Fee Nexus Study

Comparison with Fees Imposed by Neighboring Jurisdictions¹⁴

For the most part, cities in San Luis Obispo County have not adopted non-residential housing impact fees. The two exceptions are the Cities of San Luis Obispo and Pismo Beach. The City of San Luis Obispo charges a housing impact fee on new commercial developments that exceed 2,500 SF in gross floor area. The City's Ordinance requires that developers build two affordable dwelling units per acre per project, or pay an in-lieu fee that is equivalent to five percent of the building's valuation. It is difficult to compare the non-residential housing impact fees charged in the City of San Luis Obispo with proposed housing impact fees in the County, since the actual cost of this requirement to a commercial developer in the City of San Luis Obispo is not a fixed amount, but can vary based on building quality. However, it is likely that the City's fee exceeds the proposed updated fee for San Luis Obispo County.¹⁵

Pismo Beach's Ordinance requires that, for every 5,000 SF of commercial area, developers provide in-lieu fees equal to or more than two percent of the building permit value. This requirement can also be satisfied by the provision of one or more dwelling units equal to the value of, or more than, the applicable fee.

None of the surrounding counties (Monterey, Santa Barbara, and San Benito), has a non-residential housing impact fee.

How the Commercial Development Housing Impact Fee Fits into San Luis Obispo's Overall Housing Strategy

In addition to funds collected through in-lieu fees and the non-residential housing impact fee, affordable housing built in the County has been funded through the use of a variety of financing sources from the state and federal government. In addition, equity is also provided directly by the developers and indirectly raised through the allocation and sale of Low-Income Housing Tax Credits. Finally, a portion of permanent financing comes from conventional loans obtained from private lending institutions.

Housing impact fees are deposited into a Housing Trust Fund. The purpose of the County's Housing Trust Fund is to provide some local match for new (and existing) affordable housing

¹⁴ This conclusion is based on a review of local ordinances, other internet research, telephone, and email communications.

¹⁵ Using the office prototype as an example and basing development costs on Type V Office Construction, the building valuation for a 12,000 SF building (based on \$68/SF) would be \$816,000, and the 5% charged under the City's Ordinance would be \$40,800. In contrast, with a proposed fee of \$2.25/SF, the total fee for the same size and type of building in the County would be \$27,000.

Attachment C – Updated Commercial Linkage Fee Nexus Study

developments that will be seeking additional sources of financing for new development or for refinancing and rehabilitation. This Trust Fund is one of several sources of housing subsidy funds available for affordable developments built in the County. Thus, it is not necessary for the non-residential development housing impact fee to cover the complete housing affordability gap that exists for low- and moderate-income households.

ANNUAL ADJUSTMENT MECHANISM

The County adjusts its non-residential housing impact fee annually by using an annual adjustment mechanism. The County uses the Construction Cost Index for the San Francisco area that is published by the Engineering News Record. In addition to revising the fee annually for inflation, the County is encouraged to continue updating the Nexus Study every five years. The purpose of this update is to insure that the fee is still based on a cost/revenue structure that remains applicable in the San Luis Obispo County housing market. In this way, the fee will more accurately reflect any structural changes between affordable prices/rents and development costs.

Attachment C – Updated Commercial Linkage Fee Nexus Study

APPENDIX: NEXUS CALCULATION TABLE

Occupations by Land Use	2007 National Worker Distribution by Occupation Distribution	2012 SLO County Mean Income (BLS)	Adjusted Household Income (Employee Income Multiplied by the Number of Wage Earners – 1.78 Workers per Household)	Total New Employees (Based on Bldg. Size, Employee Density, and Occupation Distribution)	Percent of County Labor Force Living in Unincorporated SLO County (39%)	No. of New Households (Divide Employment by # of Wage Earners per HH - 1.78)	No. of Households Below 160% AMI (HH=2 persons, \$96,480)	Maximum SF Fee Based on Affordability Gap of \$108,000 Multiplied by the # of Households Below \$96,480)
Commercial Service - Retail (20,000 SF, 350 SF per Worker)				57	22	1.78		\$108,000
Food Preparation and Serving Related Occupations	0.336	\$21,818	\$38,836	19	7	4	4	
Sales and Related Occupations	0.331	\$36,802	\$65,508	19	7	4	4	
Office and Administrative Support Occupations	0.103	\$36,409	\$64,808	6	2	1	1	
Installation, Maintenance and Repair Occupations	0.047	\$51,589	\$91,828	3	1	1	1	
Transportation and Material Moving Occupations	0.06	\$31,825	\$56,649	3	1	1	1	
All Other Related Occupations (including personal care)	0.122	\$27,854	\$49,580	7	3	2	2	

Attachment C – Updated Commercial Linkage Fee Nexus Study

Occupations by Land Use	2007 National Worker Distribution by Occupation Distribution	2012 SLO County Mean Income (BLS)	Adjusted Household Income (Employee Income Multiplied by the Number of Wage Earners – 1.78 Workers per Household)	Total New Employees (Based on Bldg. Size, Employee Density, and Occupation Distribution)	Percent of County Labor Force Living in Unincorporated SLO County (39%)	No. of New Households (Divide Employment by # of Wage Earners per HH - 1.78)	No. of Households Below 160% AMI (HH=2 persons, \$96,480)	Maximum SF Fee Based on Affordability Gap of \$108,000 Multiplied by the # of Households Below \$96,480)
Total	0.999			57	22	13	12	\$67.37
Commercial Service - Office (12,000 SF, 300 SF per Worker)								
Management	0.072	\$97,034	\$172,721	3	1	1	0	
Business & Financial Operations	0.122	\$66,037	\$117,546	5	2	1	0	
Computer and Mathematical	0.077	\$66,627	\$118,596	3	1	1	0	
Architecture & Engineering	0.05	\$78,632	\$139,965	2	1	0	0	
Healthcare Practitioners & Technical Occupations	0.082	\$83,387	\$148,429	3	1	1	0	
Healthcare Support	0.043	\$30,697	\$54,641	2	1	0	0	
Sales and Related	0.065	\$36,802	\$65,508	3	1	1	1	
Office and Administration Support	0.34	\$36,409	\$64,808	14	5	3	3	
All Other Office Related	0.148	\$32,539	\$57,919	6	2	1	1	
Total	0.999			40	16	9	5	\$47.01

Attachment C – Updated Commercial Linkage Fee Nexus Study

Occupations by Land Use	2007 National Worker Distribution by Occupation Distribution	2012 SLO County Mean Income (BLS)	Adjusted Household Income (Employee Income Multiplied by the Number of Wage Earners – 1.78 Workers per Household)	Total New Employees (Based on Bldg. Size, Employee Density, and Occupation Distribution)	Percent of County Labor Force Living in Unincorporated SLO County (39%)	No. of New Households (Divide Employment by # of Wage Earners per HH - 1.78)	No. of Households Below 160% AMI (HH=2 persons, \$96,480)	Maximum SF Fee Based on Affordability Gap of \$108,000 Multiplied by the # of Households Below \$96,480)
Hotel/Motel (54,000 SF, 350 SF per Worker)				154	60			
Food Preparation and Serving Related Occupations	0.26	\$21,818	\$38,836	40	16	9	9	
Building and Grounds Cleaning and Maintenance Occupations	0.295	\$30,308	\$53,948	46	18	10	10	
Personal Care and Service Occupations	0.071	\$27,854	\$49,580	11	4	2	2	
Office and Administrative Support Occupations	0.187	\$36,409	\$64,808	29	11	6	6	
Installation, Maintenance and Repair Occupations	0.043	\$51,589	\$91,828	7	3	1	1	
Other Hotel Related Occupations	0.143	\$25,688	\$45,724	22	9	5	5	
Total	0.999			154	60	34	34	\$67.54
Industrial/Warehouse (12,000 SF, 750 SF per Worker)				16	6	4		

Attachment C – Updated Commercial Linkage Fee Nexus Study

Occupations by Land Use	2007 National Worker Distribution by Occupation Distribution	2012 SLO County Mean Income (BLS)	Adjusted Household Income (Employee Income Multiplied by the Number of Wage Earners – 1.78 Workers per Household)	Total New Employees (Based on Bldg. Size, Employee Density, and Occupation Distribution)	Percent of County Labor Force Living in Unincorporated SLO County (39%)	No. of New Households (Divide Employment by # of Wage Earners per HH - 1.78)	No. of Households Below 160% AMI (HH=2 persons, \$96,480)	Maximum SF Fee Based on Affordability Gap of \$108,000 Multiplied by the # of Households Below \$96,480)
Sales and Related Occupations	0.058	\$36,802	\$65,508	1	0	0	0	
Office and Administrative Support Occupations	0.131	\$36,409	\$64,808	2	1	0	0	
Construction and Exaction Occupations	0.221	\$58,173	\$103,548	4	1	1	0	
Installation, Maintenance and Repair Occupations	0.091	\$51,589	\$91,828	1	1	0	0	
Production Occupations	0.198	\$39,813	\$70,867	3	1	1	1	
Transportation and Material Moving Occupations	0.204	\$31,825	\$56,649	3	1	1	1	
All Other Industrial/Warehouse Related Occupations	0.098	\$38,152	\$67,911	2	1	0	0	
Total	1.001			16	6	4	3	\$24.61
Other Non-Residential (20,000 SF, 400 SF per Worker) (1)				50	20	11		

Attachment C – Updated Commercial Linkage Fee Nexus Study

Occupations by Land Use	2007 National Worker Distribution by Occupation Distribution	2012 SLO County Mean Income (BLS)	Adjusted Household Income (Employee Income Multiplied by the Number of Wage Earners – 1.78 Workers per Household)	Total New Employees (Based on Bldg. Size, Employee Density, and Occupation Distribution)	Percent of County Labor Force Living in Unincorporated SLO County (39%)	No. of New Households (Divide Employment by # of Wage Earners per HH - 1.78)	No. of Households Below 160% AMI (HH=2 persons, \$96,480)	Maximum SF Fee Based on Affordability Gap of \$108,000 Multiplied by the # of Households Below \$96,480)
\$24,614 - Lifeguards, recreation protective services	0.167	\$24,614	\$43,813	8	3	2	2	
\$20,085 - Amusement & recreation attendants	0.167	\$20,085	\$35,751	8	3	2	2	
\$24,267 - Recreation workers	0.167	\$24,267	\$43,195	8	3	2	2	
\$19,285 - Ushers, lobby workers, ticket takers	0.167	\$19,285	\$34,327	8	3	2	2	
\$29,962 - Counter & rental clerks	0.167	\$29,962	\$53,332	8	3	2	2	
\$36,802 - Sales & related occupations	0.167	\$36,802	\$65,508	8	3	2	2	
Total	1.000			50	20	11	11	\$59.16