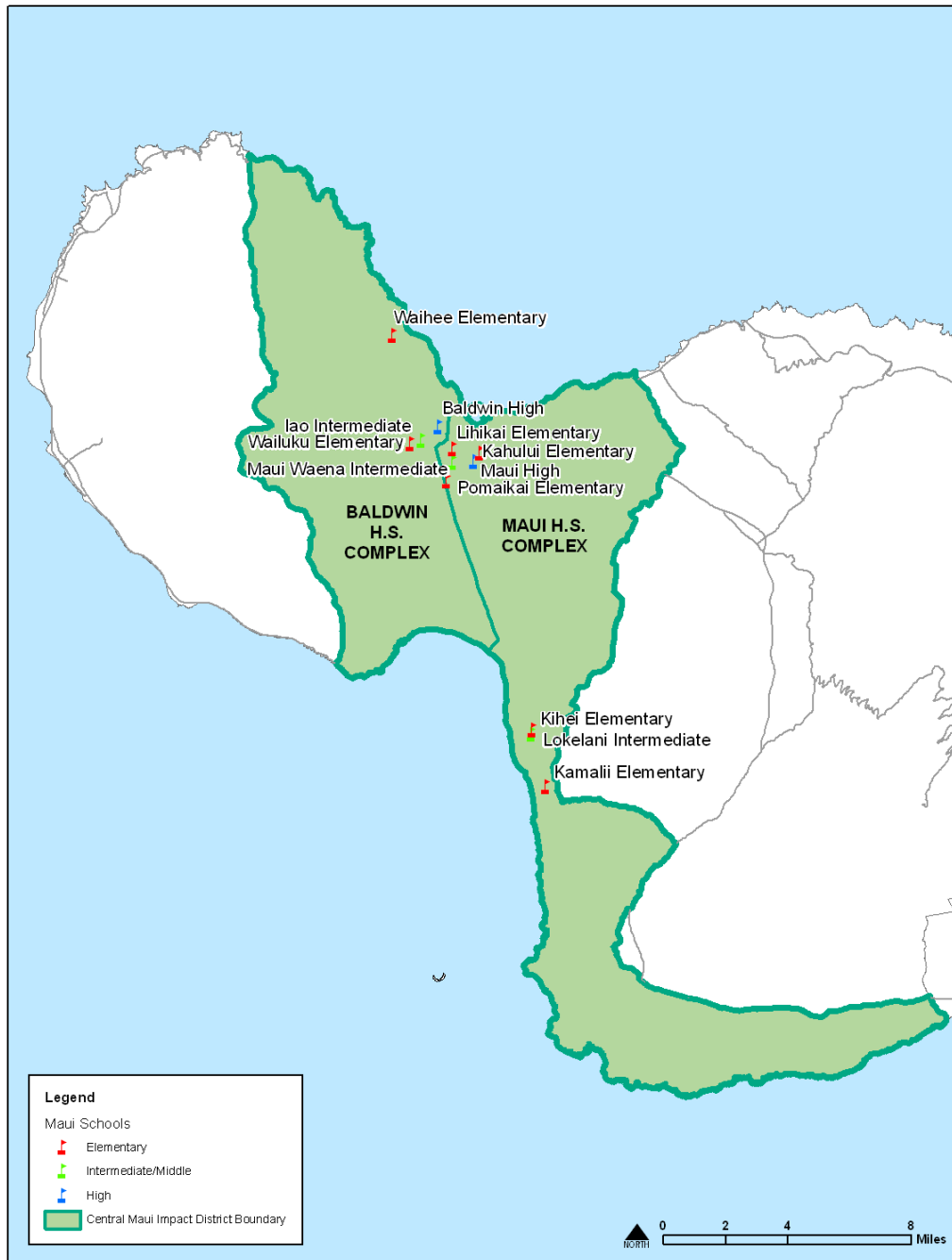


ANALYSIS OF THE CENTRAL MAUI SCHOOL IMPACT DISTRICT



Central Maui School Impact District

**This report was prepared in accordance with
Act 245, Session Laws of Hawaii 2007 and Act 188, Session Laws of Hawaii 2010**

The Department of Education held a public hearing on the Central Maui School Impact District on October 27, 2010 at the Pomaikai Elementary School.

Comments on the Central Maui School Impact District can be emailed to heidi_meeker@notes.k12.hi.us.

THE CENTRAL MAUI IMPACT DISTRICT

I. Introduction and Background

Since the early 1980's, residential developers have been required to provide land and money for public schools by state and county agencies approving the urbanization land. The Department of Education (hereinafter "DOE") collected payments of school land and cash from developers when their projects were required to make "fair-share contributions" by the State Land Use Commission or the counties to gain project approval. The DOE was only granted its own authority to collect impact fees three years ago by Act 245, Session Laws of Hawaii 2007.

The groundwork for Act 245, was done by School Impact Fee Working Group (hereinafter "Group") created by the State Legislature in 2005. The Group submitted its findings and recommendations in a report, *Hawaii School Impact Fee Working Group Report* (hereinafter "2007 Report"), prepared by Duncan Associates and Group 70 International, Inc., in March 2007. The 2007 Report provided a framework, or procedure, for determining fee schedules for those areas of the state experiencing enough new residential development to require new or expanded school facilities.

The New Law

Act 245 incorporated many of the findings and recommendations in the 2007 Report. It allows DOE to charge impact fees within school impact districts where new public schools must be constructed or expanded to accommodate students from new homes.

The 2007 Report determined that from 1997 to 2007, it cost approximately \$17,102 in school construction to house the additional students generated by one new unit of single family housing. Every 100 units of new single family homes required 0.856 acres of land for schools.

Act 245 requires developers to provide most of the land needed for new schools. In addition, developers are also required to contribute either ten percent (10%) of all new school construction costs, or ten percent (10%) of the construction costs of expanding an existing school. The balance of school construction funds would continue to come from state tax revenues.

The school impact fee law did not exempt developers of small projects or individual homeowners. For the purposes of this analysis the term developer is mean to include all home builders regardless of the number of units being constructed.

The Legislature determined that new residential developments within identified school impact districts create demand for public school facilities. Therefore, developers of new housing are required to pay a portion of the cost of providing new or enlarged public schools to serve the additional students who will be living in the new housing. The land or fees charged are based on each new development's proportionate share of the additional demand on public school facilities.

The law requires the DOE to identify impact districts where the fees could be charged. It also requires the DOE to conduct an analysis of each of the proposed districts to verify the need for new school facilities and to determine the amount of fees charged. The written analysis must contain a map showing the boundaries of the impact district, and analysis to support the need to construct new or expand existing school facilities within the next twenty-five years to accommodate projected growth in the district.

The school impact fee law was amended in 2010 by Act 188. Act 188 (2010) clarified many aspects of the school impact fee law, including the analysis required of the Department prior to seeking the adoption of a school impact district by the Board of Education.

What follows is the required analysis, based on recent history and DOE's best predictions for the future. Analyzing the future is not an easy task, especially in light of unprecedented uncertainty about the economy and home building in particular.

Summary of Findings

The DOE selected Central Maui as the location of a new school impact district. The Board of Education previously designated the West Hawaii School Impact District in April 2010. The identification of the Central Maui School Impact District (hereinafter "Impact District") is based on the growth experienced over the past 20 to 30 years (Table 1), as well as on the growth expected over the next 20 to 30 years (Table 2).

More than 16,000 new residential units are proposed in the next 25-30 years within the Impact District. These new units will generate over 6,000 additional public school students who will attend area public schools. Please refer to Appendix A for list of proposed Central Maui projects and their projected number of new units.

Over 6,000 new public school students over the next 30 years would require six to twelve new schools, with a total acreage of approximately 171 acres. The new law would result in developers providing approximately 115 of those school acres if, and when, every proposed project is completed (Table 13).

The total amount of impact fees generated from 16,000 residential units would be approximately \$26 million (Table 13). It is difficult to project the total construction cost of a large number of new or expanded schools over the next 30 years. However, for some perspective, the total cost of constructing two DOE elementary schools in 2006 was \$90 million. The full fee schedule can be found in Appendix C.

The DOE's analysis of population and enrollment growth in the Impact District concludes that there was substantial growth during the 1980's and part of the 1990's (Table 1). The number of schools serving the Impact District during that period grew from eight to eleven. That growth slowed down in the past decade and a half, with the number of schools increasing to twelve.

At some point 20 to 30 years in the future, upon the completion of most of the new residential construction proposed within the Impact District, and when the population of Wailuku, Kahului, and Kihei comes close to the estimated 104,000 people, the DOE will be responsible for providing a number of new or expanded schools.

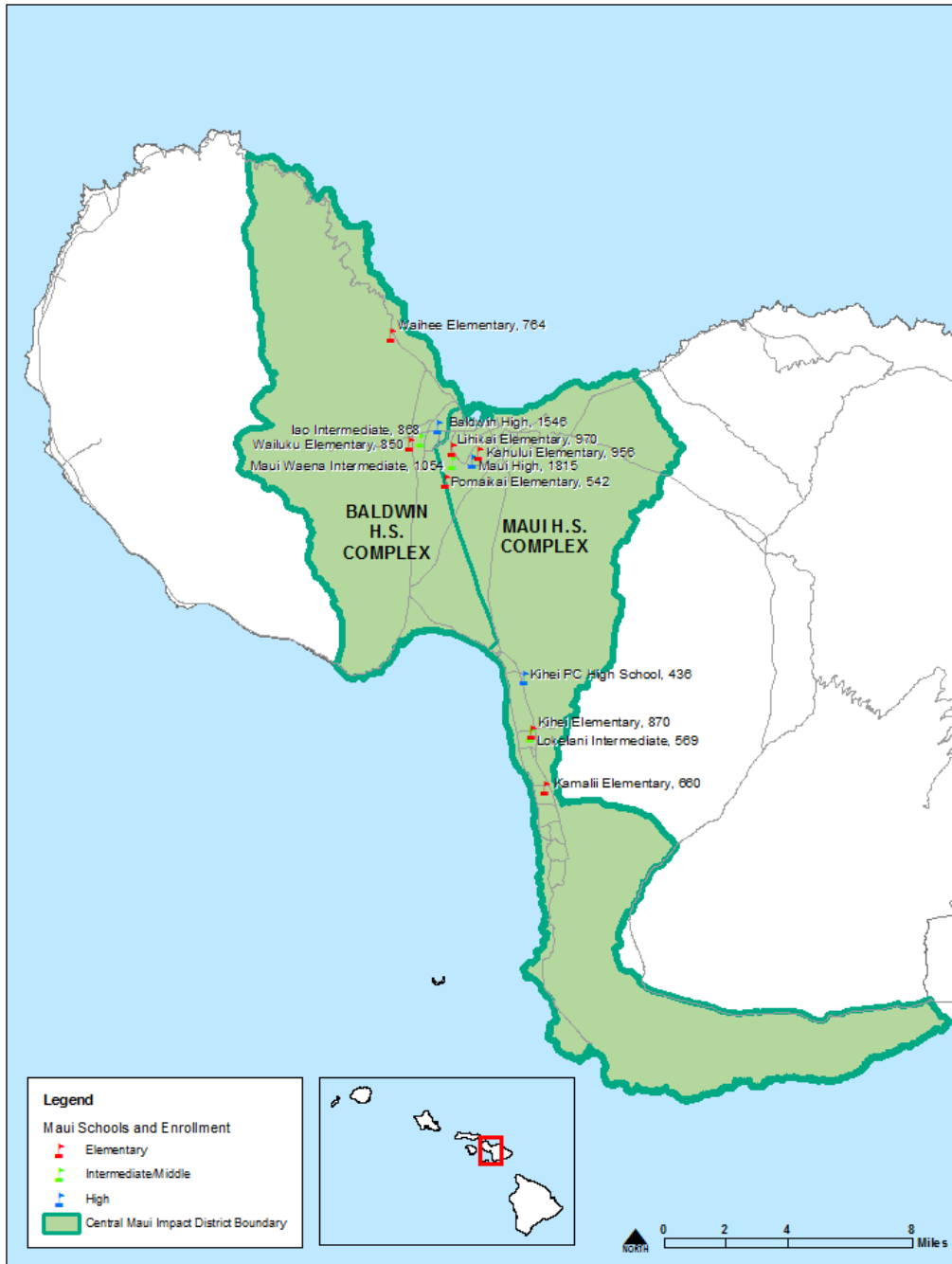
II. The Central Maui School Impact District

Act 245 defines "school impact district" as a geographic area designated by the Board of Education where anticipated growth will create the need for one or more new schools or the expansion of one or more existing schools. These schools are or will be located within the area and will primarily serve new housing units within the area. The analysis must demonstrate that growth and development are occurring and creating the need for new or expanded school facilities.

The owners or developers of many of the proposed Central Maui development projects have represented their projects as communities for full-time, year-round residents.

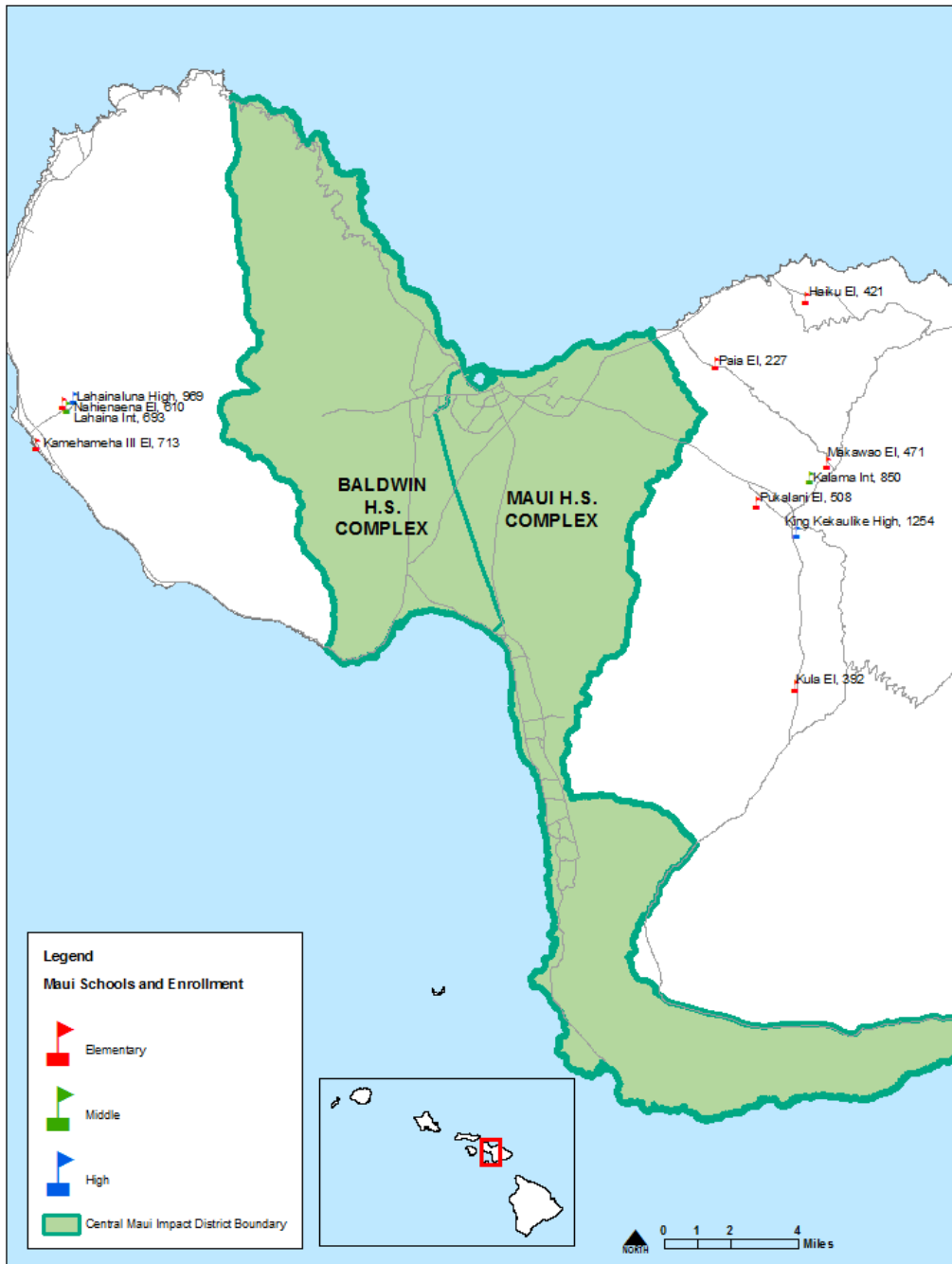
The analysis focuses on the direct impact of new development on Central Maui schools. The boundaries the DOE selected for the Impact District are the existing school service boundaries of the Maui and Baldwin complexes.

Figure 1
Map of the Central Maui School Impact District, with 2009-10 Enrollment of Schools in District



Central Maui School Impact District

Figure 2
Map of Schools Near the Central Maui School Impact District, with 2009-10 Enrollment. The
labeled schools are not within the Impact District Itself.



Schools Near the Central Maui Impact District

Description of the Central Maui School Impact District

Central Maui had substantial growth in the 1970s and 1980s. It has continued to grow since then, though at a somewhat slower rate. In 2005, Central Maui had a population of 72,235.

Table 1
Recent Population Trends

Region	1960	1970	1980	1990	2000	2005
Maui Island	35,717	38,691	62,823	91,361	117,644	129,471
Kihei-Makena		1,636	7,263	15,365	22,870	25,609
Wailuku-Kahului				32,816	41,503	46,626
Total, Kihei-Makena, Wailuku-Kahului				48,181	64,373	72,235

Source: Maui Island Plan, 2009 Draft

Maui Island has also had substantial growth over the past 45 years, with the fastest growth occurring between 1970 and 1980. During that 10 year period, the island-wide population increased by over 60%, and the population in Kihei-Makena increased by over 340%. While the *rate* of growth has slightly tapered off in recent years, Maui Island has continued to grow. Roughly 55% of Maui Island's population lived in Central Maui in 2005.

Table 2
Population Projection for Maui Island and Central Maui

Region	2010	2015	2020	2025	2030	2010-20, % change	2020-30, % change
Maui Island	135,838	146,739	157,390	167,239	176,687	15.9%	12.3%
Kihei-Makena	27,222	29,731	32,208	34,528	36,767	18.3%	14.2%
Wailuku-Kahului	49,684	54,374	59,010	63,363	67,565	18.8%	14.5%
Total, Kihei-Makena, Wailuku-Kahului	76,906	84,105	91,218	97,891	104,332	18.6%	14.4%

Source: Maui Island Plan, 2009 Draft

As detailed above, the Impact District is projected to increase in population by 36% between the present and 2030.

Enrollment in Central Maui School Impact District

The Impact District is the service area of all the schools in the Maui High and Baldwin Complexes, which includes Kahului, Kamalii, Kihei, Lihikai, Pomaikai, Waihee, and Wailuku Elementary Schools; Iao Intermediate, Lokelani Intermediate, and Maui Waena Intermediate Schools; and Maui High and Baldwin High Schools. Kihei Charter School is also within the Impact District. Historical and projected enrollment figures from 1980-2015 are shown below.

Table 3
Historical and Projected Enrollment, Central Maui School Impact District

	1980-81 school year	1990-91 school year	2000-01 school year	2009-10 school year	2015-16 school year Projected	Net Gain/ Loss, '80 to '90	Net Gain/ Loss, '90 to 2000	Net Gain/ Loss, 2000 to 2009	Total Net Gain/ Loss, 1980 to 2009	Projected Net Gain/ Loss, 2009- 2016
Baldwin Complex										
Waihee	248	493	859	764	808	245	366	-95	516	44
Wailuku	807	1,057	934	850	996	250	-123	-84	43	146
Iao Intermediate	400	641	887	868	965	241	246	-19	468	97
Baldwin High	1,382	1,725	1,707	1,546	1,714	343	-18	-161	164	168
<i>Baldwin Complex Total</i>	<i>2,837</i>	<i>3,916</i>	<i>4,387</i>	<i>4,028</i>	<i>4,483</i>	<i>1,079</i>	<i>471</i>	<i>-359</i>	<i>1,191</i>	<i>455</i>
Maui High Complex										
Kahului	968	1,050	864	956	977	82	-186	92	-12	21
Kamalii			848	660	696	0	848	-188	660	36
Kihei	772	1,216	779	870	988	444	-437	91	98	118
Lihikai	860	945	1,119	970	996	85	174	-149	110	26
Lokelani Intermediate		309	673	569	623	309	364	-104	569	54
Pomaikai				542	658	0	0	542	542	116
Maui Waena Intermediate		508	960	1,054	1,148	508	452	94	1,054	94
Maui High	1,362	1,658	1,734	1,815	1,946	296	76	81	453	131
<i>Maui Complex Total</i>	<i>3,962</i>	<i>5,686</i>	<i>6,977</i>	<i>7,436</i>	<i>8,032</i>	<i>1,724</i>	<i>1,291</i>	<i>459</i>	<i>3,474</i>	<i>596</i>
Kihei Charter				436	500	0	0	436	436	64
Central Maui School Impact District Total	6,799	9,602	11,364	11,900	13,015	2,803	1,762	536	5,101	1,115

Source: Department of Education

Public school enrollment in the Impact District has increased by over 60% from 1980 to 2000. During that period, three new schools were completed: Kamalii Elementary, Lokelani Intermediate, and Maui Waena Intermediate. All of these schools are in the Maui High Complex.

From 2000-2009, one new school, Pomaikai Elementary in the Maui High Complex, was completed. Kihei Charter School was also established during this timeframe.

In the 2009-10 school year, excluding Kihei Charter School, 5,612 students in the Impact District were in elementary schools, 2,491 students were in intermediate schools, and 3,361 students were in high schools. Enrollment in the district has increased by 5,101 over the past 29 years and is expected to continue to increase. Total projected enrollment for these schools for the next five years to the 2015-16 school year is expected to exceed 13,000 students.

Projected Growth in the Impact District

The DOE predicts 16,000 additional units in proposed residential projects in the Impact District over the next 25 years. A list of potential projects is available in Appendix A.

Table 4
New Units Projected in the Central Maui District

Region	Single Family	Multi-Family	Total Units
Baldwin Complex	3,534	2,971	6,505
Maui Complex	5,741	4,069	9,810
TOTAL	9,275	7,040	16,315

Source: DOE Analysis

Student Generation Rates

Table 5 below illustrates the number of students expected to reside in the future units. The student count is calculated by multiplying the unit counts by a set of student generation rates (SGR).

Table 5
New Students Generated from New Projected Units

Region	Single Family	Multi-Family	Total Students
Baldwin Complex	1,732	654	2,386
Maui Complex	2,813	895	3,708
Total	4,545	1,549	6,094

The SGR is the average number of students that will reside in each unit after a project has reached maturity, when it achieves a stable population. Appendix B provides an explanation of how the Impact District SGRs were calculated.

A SGR is the average number of students that are expected per unit. For example, the Impact District's single family SGR totals 0.49. This means that, on average, the DOE expects 0.49 students per single family unit. Put another way, the DOE expects 49 students per every 100 new single family units.

An analysis of school impacts within an impact district requires a district-wide student generation rate. Table 6 illustrates how the District SGRs are applied to future unit counts to produce an estimated number of additional students.

Table 6
New Students Generated by New Development in the
Central Maui Impact District through 2035

	Single Family SGR	Students in Single Family Units	Multi-Family SGR	Students in Multi-Family Units	Total
Total # units		9,275		7,040	
Elementary	0.23	2,133	0.13	915	3,048
Middle	0.11	1,020	0.04	282	1,302
High	0.15	1,391	0.05	352	1,743
Total Students		4,545		1,549	6,094

III. HOW THE IMPACT FEE FORMULA WORKS

The required impact fee consists of a land requirement, either through land dedicated by the developer or a fee in lieu, and a construction cost through a fee based on the development's proportionate share¹ of the need to build additional public school facilities.

Land component

The amount of land dedication is based on the following three variables:

- 1) Projected number of new students generated within the Central Maui District;
- 2) The number of dwelling units in the development; and
- 3) The average acres per student provided in schools built statewide in the past 10 years.

The projected number of new students is determined by multiplying the District's SGRs by the amount of single family and multi-family units. That number is then multiplied by the average acres per student to arrive at the total school land requirement for a particular development.

Act 245 supplied the average acres per student for elementary (K-5), middle (6-8) and high (9-12) schools. Based on all DOE schools built between 1987 and 2007, the actual school acreage per student figures are laid out in Table 7.

Table 7
Average Acres per Student Based On Recent School Construction

New Schools built 1997-2007	Total Acreage of all schools	Total Designed Enrollment of all Schools	Acres/Student
7 Elementary Schools	87.05	5,591	0.0156
3 Middle Schools	49.76	4,527	0.0110
3 High Schools	144.34	4,711	0.0306

Source: Hawai'i School Impact Fee Working Group Report, March 2007

¹ In determining proportionate share, new developments shall be charged for a level of service that is equal to, and no higher than, the current level of service that is being provided to existing residential areas.

Table 8
Calculating the Land Cost Component of the School Impact Fees

School type	(1) Central Maui SGR	(2)Number of Units/ Project	(3)Avg. acres/student provided '97-'07	Land fee in acres for 1 SF unit	Land fee in acres for 100 SF units
Elem	0.23	1	0.0156	0.00359	0.359
Middle	0.11	1	0.0110	0.00121	0.121
High	0.15	1	0.0306	0.00459	0.459
Acreage for Central Maui Single Family Units				0.00939	0.939
				1 Multi-family unit	100 Multi-family units
Elem	0.13	1	0.0156	0.00203	0.203
Middle	0.04	1	0.0110	0.00044	0.044
High	0.05	1	0.0306	0.00153	0.153
Acreage for Central Maui Multi-family Units				0.00400	0.400

School Land Formula

To calculate the land dedication requirement for an individual project, the acres per student required for elementary, middle and high school is each multiplied by the total number of single family and multi-family units in the project. The results are then all added together for the total acreage required from the project.

According to the land formula above, in the Impact District, the school land required to accommodate new students is 0.939 acres for every 100 single family homes and 0.400 acres for every 100 multi-family homes.

Fee-in-Lieu of Land

If the DOE determines it does not need land, it will notify a developer of a need for a fee-in-lieu of land.

The dollar amount of the fee-in-lieu of land is determined using the following formula: the total school land requirement multiplied by the value per acre of existing school sites in the district. The value is based on the appraised fair market value of improved, school sites, zoned for residential use with the necessary infrastructure. The DOE had an appraisal completed in September 2010 for the value of elementary, middle, and high school land in Central Maui.

**Table 9
Per-Acre Land Figures Based on Appraisal and Fee-in-Lieu of Land Per Unit**

	Value Per Acre from Appraisal	Land Fee Per SF Unit (Acres)	Fee-in-Lieu Per SF Unit
Elementary	\$445,250	0.00359	\$ 1,598
Middle	\$398,167	0.00121	\$ 482
High	\$248,420	0.00459	\$ 1,140
Total Fee-in-Lieu of Land per Single Family Unit			\$ 3,220
		Land Fee Per MF Unit (Acres)	Fee-in-Lieu per MF Unit
Elementary	\$445,250	0.00203	\$ 903
Middle	\$398,167	0.00044	\$ 175
High	\$248,420	0.00153	\$ 380
Total Fee-in-Lieu of Land per Multi-Family Unit			\$ 1,458

School Construction Cost Component

In addition to the land dedication requirement, developers must also provide 10% of all new school construction costs.

The construction cost impact fee is based on the following five variables:

- 1) Student generation rates for the Central Maui District;
- 2) Recent statewide public school construction costs per student;
- 3) The statewide percentages of students in permanent school facilities;
- 4) The area-distinct construction cost factors for the twenty-six geographically defined cost districts; and
- 5) The number of single family and multi-family dwelling units in the development.

Student generation rates were discussed earlier in this document. Recent public school construction costs per student are from the 2007 *Hawaii School Impact Fee Working Group Report*. The construction cost factor is 1.15 for Wailuku and 1.25 for Makawao, as specified in Act 245. Most of the Central Maui Impact District is in the Wailuku Cost District; however, a portion of the Kihei area is in the Makawao Cost District.

The statewide percentage of permanent classrooms to all classrooms is below. In the case of schools with grades of K-8, K-12, or 6-12, the classrooms were pro-rated based on 6 elementary school grades, 3 middle school grades, and 4 high school grades. For example, if a K-8 school had 9 permanent classrooms and 3 portable classrooms, 6 permanent classrooms and 2 portable classrooms would be treated as elementary school classrooms, and 3 permanent classrooms and 1 portable classroom would be treated as middle school classrooms.

Table 10
Statewide Permanent and Portable Classrooms

	Permanent Classrooms	Portable Classrooms	Total Classrooms	Percentage of Classrooms that are Permanent
Elementary	5,402	981	6,383	84.6%
Middle	1,822	233	2,055	88.7%
High	2,637	443	3,080	85.6%
Total	9,861	1,657	11,518	85.6%

Source: DOE Data, 2009-10 Classroom Utilization.

Impact fees cannot be used to provide a higher level of service than is already being provided. Impact fees must be based on a level of service standard that “shall apply equally to existing and new public facilities.”² Act 245 defines “Level of service” as the percentage of classrooms that are in permanent structures, as opposed to portable buildings.

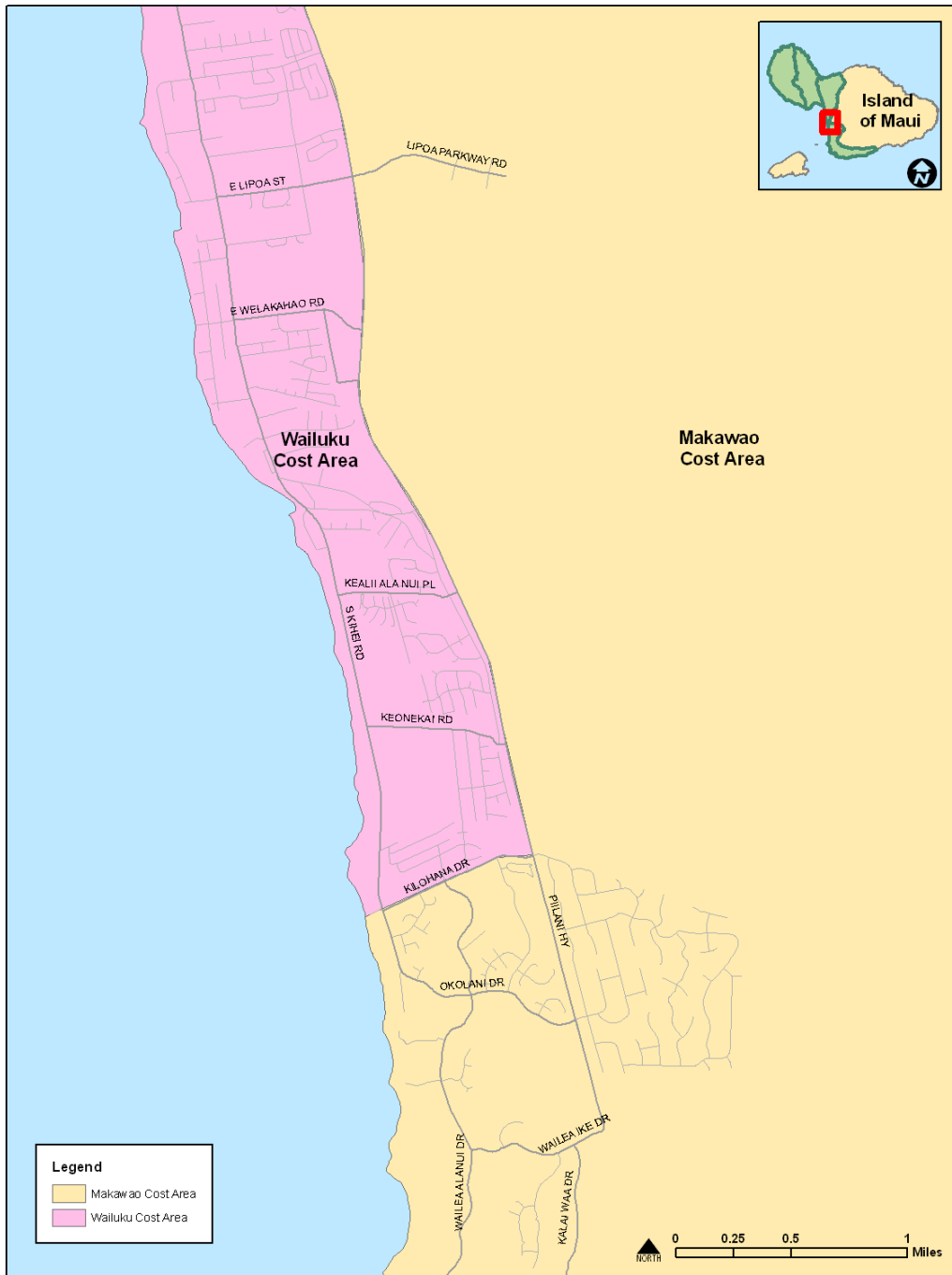
A discussion of the percent of Maui students in permanent school facilities follows under the heading “Current Local Levels of Service.”

The Central Maui Impact District crosses two construction cost areas, Makawao and Wailuku, which means two construction fee schedules are required. The DOE follows the cost districts set by the Department of Accounting and General Services for its cost areas:

- Projects in the Baldwin Complex are in the Wailuku cost area.
- Currently, most Maui High Complex projects are in the Wailuku cost area, except for projects in Kihei-Makena.
- Kihei-Makena projects that are mauka of Piilani Highway or south of Kilohana Drive are in the Makawao cost area, as shown in Figure 3.
- Kihei projects that are makai of Piilani Highway and north of Kilohana Drive are in the Wailuku cost area, as shown in Figure 3.

² *Hawaii School Impact Fee Working Group Report*, Duncan and Associates and Group 70 International, Inc., March 2007, page 44.

Figure 3: Cost Areas, Impact District, Kihei-Makena Region



Cost Areas in the Central Maui School Impact District

Table 11
Calculating the Construction Cost Component of the School Impact Fees:
Baldwin Complex and Maui Complex within the Wailuku Cost Area

Type of School	(1) Central Maui SGR	(2) Recent School Construction Costs/student	(3) Discounted by the per cent of statewide classrooms in permanent structures	(4) Construction Cost Factor for Wailuku	(5) Number of Units/ Project	Construction Costs per 1 unit of housing	10% of cost = fee amount
Elem	0.23	\$35,357	0.846	1.15	1	\$ 7,912	\$ 791
Mid	0.11	\$36,097	0.887	1.15	1	\$ 4,050	\$ 405
High	0.15	\$64,780	0.856	1.15	1	\$ 9,565	\$ 957
Construction Fee for Single Family Units in the Baldwin Complex and in the Maui Complex within the Wailuku Cost Area							\$2,153
Elem	0.13	\$35,357	0.846	1.15	1	\$ 4,472	\$ 447
Mid	0.04	\$36,097	0.887	1.15	1	\$ 1,473	\$ 147
High	0.05	\$64,780	0.856	1.15	1	\$ 3,188	\$ 319
Construction Fee for Multi-Family Units in the Baldwin Complex and in the Maui Complex within the Wailuku Cost Area							\$ 913

Table 12
Calculating the Construction Cost Component of the School Impact Fees:
Maui Complex within the Makawao Cost Area

Type of School	(1) Central Maui SGR	(2) Recent School Construction Costs/student	(3) Discounted by the per cent of statewide classrooms in permanent structures	(4) Construction Cost Factor for Makawao	(5) Number of Units/ Project	Construction Costs per 1 unit of housing	10% of cost = fee amount
Elem	0.23	\$35,357	0.846	1.25	1	\$ 8,600	\$ 860
Mid	0.11	\$36,097	0.887	1.25	1	\$ 4,402	\$ 440
High	0.15	\$64,780	0.856	1.25	1	\$ 10,397	\$1,040
Construction Fee for Single Family Units in the Maui Complex within the Makawao Cost Area							\$2,340
Elem	0.13	\$35,357	0.846	1.25	1	\$ 4,861	\$ 486
Mid	0.04	\$36,097	0.887	1.25	1	\$ 1,601	\$ 160
High	0.05	\$64,780	0.856	1.25	1	\$ 3,466	\$ 347
Construction Fee for Multi-Family Units in the Maui Complex within the Makawao Cost Area							\$ 993

The Formula (for either single family or multi-family units):

Elementary SGR per unit (x) elementary school cost per student (x) percentage of existing elementary students in permanent buildings (x) construction cost district factor;
 plus (+)

Middle or intermediate school student generation rate per unit (x) middle or intermediate school cost per student (x) statewide percentage of existing middle school students in permanent buildings (x) cost district factor;

plus (+)

High school student generation rate per unit (x) high school cost per student (x) statewide percentage of existing high school students in permanent buildings (x) cost district factor;

equals (=)

School construction cost per unit.

The school construction cost per unit (x) 10% = construction fee amount.³

The construction cost per unit, for elementary, middle and high schools and for single family and multi-family units is then multiplied by the number of single family and multi-family units, respectively.

The components of Tables 7-12 are subject to revision as required by Act 245 and Act 188. The DOE anticipates that the next revision will be in January 2011.

An Estimated Total of Impact Fees for the District

Based on the foregoing analysis, over the next 25 to 30 years in the Impact District, over 16,000 additional residential units and over 6,000 new public school students will require that developers contribute a total of 115.25 acres and over \$26 million in construction impact fees. See Table 13, below. In Table 13, only the Wailuku Cost Area is used for Maui Complex projects.

Table 13
Estimate of Total Impact Fees for Central Maui School Impact District, Based on Projected Number of New Units

Complex	Unit Type	Units	Total Land Fee (acres)	Total Construction Fee
Baldwin	Single Family	3,534	33.18	\$ 7,608,702
	Multi-Family	2,971	11.88	\$ 2,712,523
Maui	Single Family	5,741	53.91	\$12,360,373
	Multi-Family	4,069	16.28	\$ 3,714,997
Total		16,315	115.25	\$26,396,595

Board of Education Policy

Table 7 sets the historic average acreage per student provided from 1997 to 2007. That is the basis for calculating the land component of the impact fee. The BOE policy for future schools reflects a range of school sizes, including campus acreage and number of students. The average acreage per student for actual future schools (Table 14) may be larger than the historic average acreage (Table 7) used to calculate the fee amount.

³ Act 245 (§302A-1605, Hawaii Revised Statutes) states the fee for construction shall be 10% of the construction cost per unit.

**Table 14
New BOE Policy on Acreage and Enrollment**

	Usable⁴ Acres/school	Enrollment/school	Acres/student
Elementary	8-15	400- 750	.02
Middle	15-20	500-1,000	.02-.03
High	45-55	800-1,600	.0343-.0562

The new BOE policy for school size could mean that when the Impact District is built out, the additional enrollment would require between six and twelve new schools, with a total land requirement of approximately 171 acres. As calculated in Table 13 above, developers would be required to provide approximately 115 acres. The balance of the land would have to be purchased with state revenues or could be provided by developers and credited against their construction fee requirement.

**Table 15
New Central Maui Students and Number of New Schools Needed**

	# additional students in district	# schools based on minimum enrollment size	# schools based on maximum enrollment size	Acres per student	Acres needed (approx.)
Elementary	3,048	8	4	0.020	61
Middle	1,302	3	1	0.023	30
High	1,743	2	1	0.046	80
Total	6,094	12	6		171

IV. Legal Tests and Required Considerations

Rational Nexus and Rough Proportionality

The amount of new schools and potential impact fees must meet the “rational nexus” and “rough proportionality” tests established by court decisions.

“Rational nexus” was defined in the case of *Nollan v. California Coastal Commission*, 483 U.S. 825 (1987), as the reasonable connection that must exist between new development and the new or expanded facilities required to accommodate that development. “Rough proportionality” was defined in the case of *Dolan v. City of Tigard*, 512 U.S. 374 (1994), as an expansion of the rational nexus test, adding that there must be a “rough proportionality” between the impact of the new development and burden of the exaction imposed on it.

In this analysis, the required additional public school facilities are a direct result of the anticipated development’s additional residential units and their additional public school students. The District anticipates over 16,000 new residential units (Appendix A), which will generate over 6,000 additional new public school students. To accommodate the increase in enrollment, a large number of new public schools will be required.

Both the land and construction cost requirement of the impact fee are roughly proportional to the amount of anticipated new development. The acreage requirements for new school facilities are based on actual historic school construction averages, not an arbitrary amount. The cost of the land, when used to

⁴ *DOE Policy #6701*; Usable is generally defined as land free of encumbrances determined to be unnecessary by the department of education, slope of five percent or less, with no ravines or stream beds. The DOE will make the final determination as to whether land is usable based on an evaluation of the specific property taken in the context of the development as a whole.

determine the fee in-lieu, is the fee simple value of school sites in the impact district as if it was vacant land, zoned for residential use with the necessary infrastructure.

In addition, each development pays the same amount per unit and the fees can only be used to build school facilities serving the students in the impact district.

Current Local Level of Service

The following table provides information on existing and projected conditions in the DOE schools located within the Impact District.

As shown below, Waihee Elementary, Iao Intermediate, Maui Waena Intermediate, and Maui High School have 2009-2010 enrollments greater than their 2009-10 facility capacity. Kahului Elementary, Kihei Elementary, Lihikai Elementary, and Baldwin High School are very close to their facility capacity.

**Table 16
2009-2010 Enrollment and Facility Capacity in the Impact District**

School	Type	Facility Capacity, 2009-10	Enrollment, 2009-10	% of Existing Capacity	# Perm. Class Rooms	# Portables	% Port to All Class rooms
Kahului	Elem	963	956	99%	38	13	25.5%
Kamalii	Elem	809	660	82%	39	0	0.0%
Kihei	Elem	923	870	94%	40	13	24.5%
Lihikai	Elem	1,072	970	90%	32	26	44.8%
Pomaikai	Elem	885	542	61%	44	0	0.0%
Waihee	Elem	683	764	112%	32	10	23.8%
Wailuku	Elem	1,057	850	80%	51	9	15.0%
Iao	Middle	767	868	113%	39	7	15.2%
Lokelani	Middle	808	569	70%	25	14	35.9%
Maui Waena	Middle	909	1,054	116%	42	12	22.2%
Baldwin	High	1,555	1,546	99%	67	24	26.4%
Maui	High	1,701	1,815	107%	57	36	38.7%

Source: DOE data and 2007 Statewide School Impact Fee Report

By school level, the above table can be summarized by the table below.

**Table 17
2009-2010 Enrollment and Facility Capacity by School Level**

	Facility Capacity, 2009-10	Enrollment, 2009-10	% of Existing Capacity
Elementary	6,392	5,612	88%
Middle	2,484	2,491	100%
High	3,256	3,361	103%

This shows that currently, without considering future enrollment, there is a need for additional middle and high school facility capacity within the Impact District.

Related Issues

Act 188 requires a statewide classroom utilization report, which contains the current design enrollment per school, the current total student enrollment per school, and the current number of classrooms not being used for active teaching. That data can be found in Appendix E.

Underutilized School Facilities

Act 245 (§302A-1605, Hawaii Revised Statutes) requires an analysis of proposed redistricting, listing the advantages and disadvantages by making more efficient use of existing underutilized assets.

Generally the schools with the largest amount of excess facility capacity are located outside the impact fee boundaries. The Impact District is self-contained; no schools serving its students are outside of the Impact District.

Schools like Kula Elementary, Lahaina Intermediate, and Kekaulike High could only accommodate students from Central Maui growth areas by transporting them extremely long distances through considerable traffic congestion, as shown on Figures 1 and 2. Long daily school commutes have been extremely unpopular with parents and students. The long commute times may preclude students from participating in extracurricular activities such as sports and music, and students can spend almost an hour, or even more, commuting.

Table 18
Some Commute Times to Schools Serving the District

Route	Miles	Time
Kahakuloa to Waihee Elementary	9.9	29 minutes
Maalaea to Baldwin High	7.3	17 minutes
Makena to Maui High	18.6	42 minutes

There is a small amount of excess capacity in Kahului Elementary, Kihei Elementary, Lihikai Elementary, and Baldwin High, and a moderate amount of excess capacity in Kamalii Elementary, Pomaikai Elementary, Wailuku Elementary, and Lokelani Intermediate. However, the available capacity is not sufficient to accommodate the number of additional students expected in the Central Maui area over the next 25 to 30 years.

The DOE is currently reviewing school consolidations across the state. None of the currently contemplated consolidations would affect schools serving the Impact District.

Concurrently with this study of Central Maui as a school impact district, the DOE is studying West Maui as a school impact district. Any current excess capacity in West Maui schools is projected to disappear based on plans for residential development projects in West Maui.

Busing and Redistricting to Relieve Overcrowded Schools

As discussed above, due to the distance between the Central Maui schools and the Lahainaluna and Kekaulike Complexes, busing and redistricting would not be practical.

School Design Issues

Act 245 (§302A-1605, HRS) requires an analysis of appropriate school land area and enrollment capacity, which may include non-traditional (i.e. mid-rise or high-rise structures) facilities to accommodate the need for public school facilities in high growth areas within existing urban developments.

There are advantages of both single-story and multi-story school construction. Single-story construction eliminates the cost of stairwells and elevators, is more residential in character, and makes it easier to utilize natural light. Single-story construction also provides for more flexibility in construction, such as allowing DOE to postpone some of the classroom wings in the planned new Ewa Makai facility until additional funding becomes available. The main advantage of multi-story schools is that they require a smaller footprint on the site, which allows for smaller sites and/or more open space on a site. Multi-story construction also facilitates stacking of utilities and shorter utility lines.

The DOE encourages the preservation of open space on its school sites, and therefore strongly supports the use of multi-story structures when appropriate. Typically, this has resulted in the stacking of the classroom buildings. Ten of the last 13 schools built by DOE have had multi-story classroom facilities. The advantages of multi-story schools in terms of reduced site area per student has already been incorporated into the historical design standards used in this report to determine land dedication requirements. Higher than two-story structures might be considered in more urban areas, but are probably not appropriate in Central Maui.

The U.S. Census Bureau defines an urban area as: “Core census block groups or blocks that have a population density of at least 1,000 people per square mile and surrounding census blocks that have an overall density of at least 500 people per square mile.” In 2000, the Census identified resident population per square mile for Maui County to be 110.5, considerably less than either 1,000 or 500 per square mile. Given this definition, the Impact District would not be defined as being located within an existing urban development.

Geographic Exceptions

There are numerous reasons why parents request geographic exceptions (GE) so their children are able to attend schools outside the service area where they reside. The DOE administrative rules⁵ govern the method of granting a student a GE. The decision to grant or deny GE’s belongs solely with the principal of each school.

Very little data exists on the number of students applying or receiving GE’s at individual schools, at the complex level, or statewide, but the numbers are generally small. Every school probably has some outside students coming in to attend that school as well as some students from the area going to schools outside the area. The net effect of GE’s on enrollment at most schools is minimal. The number of GE students at individual schools can fluctuate year to year by the actions of one or two families.

When a school is crowded or faces the likelihood of overcrowding, a principal can decide not to accept any GE applications. However, any student residing in the school’s service area must be allowed to enroll.

The rules of the federal government’s No Child Left Behind Act⁶ permit students from failing schools to transfer to schools in good standing. There have been very few requests in Central Maui for transfers based on the federal Act.

⁵ *Hawaii Administrative Rules*, Title 8, Chapter 12, Compulsory Attendance Exceptions

⁶ Public Law 107-110

The number of GE's in any school, in any given year, is not statistically significant enough to address school overcrowding issues.

Charter Schools

The Hawaii Revised Statutes (Chapter 302A-1608) is silent as to whether impact fees can or cannot be used for charter schools. The intent of the impact fee is to provide school facilities for the students generated by the development against which the impact fee is levied. Therefore, school impact fees may be utilized for charter schools, provided that school serves a sufficient amount of students generated from the development. A charter school could enroll students from around the island, but would have to provide a specified number of spaces to offset the enrollment impact of the development creating the need for a school.

There is one charter school in Central Maui: Kihei Charter School.

Use of Public Land

The primary consideration in determining where to locate a new public school is convenience to public school students. New schools should be located where there will be large numbers of new houses. The DOE locates schools on a case-by-case basis as it negotiates with large landowners, both private and state, and adapts to their development schedules. In the future, it is more likely that larger high school sites will come from state owned land, as few private development projects are large enough to be required to provide 45 to 55 acres for a high school.

The DOE, in the past, has used state land for public schools in situations where large amounts of state land are developed for residential use. For example, all of the schools in the Kapolei (Oahu) and Kealakehe (Hawai'i) developments were built on state lands. The use and responsibility for school land is transferred from the State to the DOE in executive orders from the Governor.

The DOE will continue to seek school sites in any future large development of state land in the same manner as DOE pursues school sites in large developments of private land. Future school sites are reserved in state developments in East Kapolei (Oahu), Keahuolu (Kealakehe), and Lealii (Lahaina). It is likely DOE will continue to request and receive state parcels within state residential developments.

There is no guarantee that DOE will receive state parcels that stand alone, outside of state residential developments. Sometimes land is considered for one agency and then gets redirected to serve another purpose.

When private developers provide school sites, they also provide the infrastructure for the school site, including water, sewage and drainage. The private developers also build the roads that provide access to the school sites. If DOE were provided a stand-alone state parcel, the additional costs for improving the school site would most likely be borne by taxpayers.

Department of Hawaiian Home Lands

Please see Appendix D for a response provided by The Department of Hawaiian Home Lands (DHHL).

Maui Island Plan—General Plan Update 2030

As of this writing, Maui County is in the process of updating its general plan for 2030. The Maui County Council is reviewing a draft Maui Island Plan which will include growth boundaries. The DOE must locate most of its schools within residential developments that will provide the school sites. DOE will continue to coordinate with the County of Maui so it can be assured its future school sites are adequate and well located.

Appendix A
List of Proposed Projects

Table 19 has a list of proposed projects in Central Maui. This list represents the future projects in Central Maui that the DOE is aware of as of October 28, 2010. Some of these projects lack entitlements or approvals. Additional projects that are not on this list may be proposed or developed in the future.

The presence of a project on this list should not be interpreted to mean that the project will happen or that the project has all of its approvals and entitlements.

Table 19
Proposed Central Maui Projects and Proposed Number of Units

Project	Owner/Developer	SF	MF	Total
Baldwin Complex				
901 Lower Main Street	Habitat for Humanity	0	40	40
Hale Mua	Sterling Kim	466	0	466
Kehalani	Sanford Carr	560	611	1,171
Maalaea Triangle workforce	Victory	0	100	100
Malaihi	Betsill	10	0	10
Pi'ihana		95	440	535
Pu'unani	Towne	238	0	238
Valley Isle Fellowship		0	100	100
Wai'aie Growth Area		1,350	1,200	2,550
Waiehu 'Aina (ag lot)	Bear	17	0	17
Waihee Mauka (ag lot)	Betsill (RDD LLC)	16	0	16
Waihee Valley Large Lot		24	0	24
Waikapu Country Town	Atherton	750	480	1,230
Waikapu Ranch		8	0	8
Baldwin Complex Subtotal		3,534	2,971	6,505
Maui Complex				
Alahele subdivision	Wilshire DMK I, LLC	48	0	48
Aloha Village Townhomes	Towne	0	78	78
Fairways (Maui Lani)	VP & PK	50	0	50
Hale Pama Condo		0	6	6
Haleakala Ranch	Haleakala Ranch	975	525	1,500
Hokulani Golf Villas	Signature Homes	152	0	152
Honua'ula (Wailea 670)		560	840	1,400
Hoohani Subdivision		0	28	28
Iwi View	Horizon	0	28	28
Kaonoulu Phase VI	Betsill	0	166	166
Kahului Town Center	A&B	0	442	442
Kahului Town Terrace	Hui Kauhale, EAH	0	72	72
Kaiwahine Subdivision	Royal Main Prop.	47	0	47
Kane Street	A&B Kane	0	103	103
Ka Ola Place	Lokahi Pacific	10	0	10
Keaka	Dowling	0	13	13
Keala Villiage	Canco Construction	49	0	49

Project	Owner/Developer	SF	MF	Total
Kenolio Leilani (afford)	Transpacific	7	0	7
Kenolio Place	Betsill	0	18	18
Kihei Hanalei	Majid Dezahd	0	4	4
Kihei Residential Project	A&B	95	505	600
Kilohana Waena	D&I Enterprises	31	0	31
Liloha Village Subdivision	Medo LLC	65	0	65
Maui Lani	HRT	620	306	926
Maui Lani Horton	Horton	71	0	71
Maui Lani Mills & Expansion	Mills	840	482	1,322
Nani Loa Condo	Victory Devel.	0	64	64
Nu'u aina Estates	Betsill	68	0	68
Ohukai	Stanford Carr	700	0	700
Pacifica Resources		52	0	52
Papaanui Subdivision	Papaanui	7	0	7
Paradise Ridge Estates		0	32	32
Kamali'i Alayna (Waipuilani Estates)		92	0	92
Wailea Kai Malu (MF-7)	A&B	0	75	75
Wailea MF-5 (Kanani Wailea)	Pacific Land & Homes	28	0	28
Wailea MF-9 (Ho'olei)	MF-9 Assoc.	0	120	120
Wailea MF-10		0	144	144
Wailea 10 M-35		15	0	15
Wailea MF-19	A&B	9	0	9
Walaka Village	Angres Trust	0	18	18
MF21 Subdivision		7	0	7
One Palauea Bay		17	0	17
One Wailea Development		21	0	21
Makena Resort		1,105	0	1,105
Maui Complex Subtotal		5,741	4,069	9,810
Central Maui Impact District Total		9,275	7,040	16,315

Appendix B
Calculation of Student Generation Rates

The Student Generation Rate (SGR) is the number of expected public school students, on average, per unit within a development or district. For example, a SGR of 0.5 means that, on average, 0.5 public school students per unit, or 50 students per 100 units, are expected.

The DOE determined SGRs for the Central Maui Impact District by first taking the number of students attending Central Maui public schools who also live in Central Maui. The DOE divided this by the number of existing single-family and multi-family units in Central Maui.

Table 20
Student Generation Rate Calculation for the Central Maui Impact District

Grade Levels	Existing Units in Central Maui District		Students Enrolled in the Central Maui District		Student Generation Rates	
	Single Family Units	Multi-Family Units	Single Family Units	Multi-Family Units	Single Family	Multi-Family
Elementary	19,361	8,266	4,496	1,063	0.23	0.13
Middle	19,361	8,266	2,061	354	0.11	0.04
High	19,361	8,266	2,883	387	0.15	0.05
Total	19,361	8,266	9,940	1,804	0.49	0.22

The number of units in the table above does not include units that are considered vacation rentals or timeshares.

Appendix C
Fee Schedule

Projects in the Central Maui School Impact District will pay a construction fee and *either* contribute land *or* pay a fee in lieu of a land contribution.

For more detail on these calculations, please see Table 8 for the land fee, Table 9 for the fee-in-lieu of land, and Table 11 and Table 12 for the construction fee.

The components of these fees are subject to occasional updates pursuant to Act 245, as amended.

Table 21
Fee Schedule: Wailuku Cost District Only

# Units	Est # of Total Students	Construction Fee		Land Amount		Fee-in-Lieu of Land		Construction and Fee-in-Lieu
		Per Unit	Total	Acres Per Unit	Total Acres	Per Unit	Total	
Single Family								
1	0.49	\$2,153	\$2,153	0.009388	0.009388	\$3,220	\$ 3,220	\$ 5,373
2	0.98	"	\$4,306	"	0.018776	"	\$ 6,440	\$ 10,746
5	2.45	"	\$10,765	"	0.046940	"	\$ 16,100	\$ 26,865
100	49	"	\$215,300	"	0.938800	"	\$ 322,000	\$ 537,300
1000	490	"	\$2,153,000	"	9.388000	"	\$ 3,220,000	\$ 5,373,000
Multi-Family								
1	0.22	\$913	\$913	0.003998	0.003998	\$1,458	\$ 1,458	\$ 2,371
2	0.44	"	\$1,826	"	0.007996	"	\$ 2,916	\$ 4,742
5	1.1	"	\$4,565	"	0.001999	"	\$ 7,290	\$ 11,855
100	22	"	\$91,300	"	0.399800	"	\$ 145,800	\$ 237,100
1000	220	"	\$913,000	"	3.998000	"	\$ 1,458,000	\$ 2,371,000

Table 22
Fee Schedule: Makawao Cost District Only

# Units	Est # of Total Students	Construction Fee		Land Amount		Fee in Lieu of Land		Construction and Fee-in-Lieu
		Per Unit	Total	Acres Per Unit	Total	Per Unit	Total	
Single Family								
1	0.49	\$2,340	\$2,340	0.009388	0.009388	\$3,220	\$ 3,220	\$ 5,560
2	0.98	"	\$4,680	"	0.018776	"	\$ 6,440	\$ 11,120
5	2.45	"	\$11,700	"	0.046940	"	\$ 16,100	\$ 27,800
100	49	"	\$234,000	"	0.938800	"	\$ 322,000	\$ 556,000
1000	490	"	\$2,340,000	"	9.388000	"	\$ 3,220,000	\$ 5,560,000
Multi-Family								
1	0.22	\$993	\$993	0.003998	0.003998	\$1,458	\$ 1,458	\$ 2,451
2	0.44	"	\$1,986	"	0.007996	"	\$ 2,916	\$ 4,902
5	1.10	"	\$4,965	"	0.019990	"	\$ 7,290	\$ 12,255
100	22	"	\$99,300	"	0.399800	"	\$ 145,800	\$ 245,100
1000	220	"	\$993,000	"	3.998000	"	\$ 1,458,000	\$ 2,451,000

Appendix D
A Response from the Department of Hawaiian Home Lands

Because the Department of Hawaiian Home Lands (DHHL) does not need state or county land use approvals, it has not been required to provide land and fair-share contributions to the DOE. DHHL acknowledges that its communities need schools but is of the opinion that it should not be required to pay such impact fees to the DOE. A major reason of this opinion is the fact that DHHL is a state agency that develops homes in accordance with the Hawaiian Homes Commission Act of 1920, as amended (Act). The policy of this Act is to “enable native Hawaiians to return to their lands in order to fully support self-sufficiency for native Hawaiians and the self-determination of native Hawaiians in the administration of this Act, and the preservation of the values, traditions, and culture of native Hawaiians.”

Everyday, DHHL operates to achieve the policy as stated in the most unique way. As noted, DHHL develops homes as a state agency and not as a private for-profit developer, or even as a non-profit organization. DHHL uses funds out of Act 14 and revenues generated by its income-producing properties. It does not generate any profits in the sale of homes to its beneficiaries. If DHHL was a for-profit organization, it would be selling its homes at a loss. For example, the cost to construct a residential lot and provide it with the necessary infrastructure, such as water, drainage, sewer and utilities, may cost up to \$200,000 per lot, depending on its location. The cost for the development of the lot is not passed on to the beneficiaries. Only the cost of the home is passed on to the beneficiaries and DHHL does not recover the cost of constructing the lot. A private for-profit developer or a non-profit would include the cost of any impact fees into the sales price of the home to recapture the fee as well as any cost to construct the lot. Another major reason for DHHL not to pay the impact fee is the fact that DHHL is returning the native Hawaiians to the land, land that they were originally on.

It is unknown whether DHHL would be legally compelled to pay impact fees when they develop new housing. DHHL is of the opinion, however, that any legislation can be created so DHHL is exempt from paying such fees for the reasons cited above.

Appendix E
Classroom Utilization Report

Act 188 (2010) requires the inclusion of a statewide classroom utilization report in this analysis. The report includes the current design enrollment per school, the current total enrollment per school, and the current number of classrooms not being used for active teaching.

Design enrollment is specifically defined in Act 188 as “the maximum number of students, or student capacity, a permanent school facility is designed to accommodate.”

The design enrollment column will only consist of permanent classroom buildings. In general, a permanent elementary school classroom holds 23 students, and a permanent middle or high school classroom holds 25 students. For example, if an elementary school had 10 permanent classrooms, its design enrollment is 230.

For schools with both elementary and middle or high school students, classrooms are pro-rated based on 6 elementary school grades, 3 middle school grades, and 4 high school grades.

For example, an elementary and middle school has 9 permanent classrooms. These classrooms are pro-rated based on 6 elementary school grades and 3 middle school grades. Six elementary classrooms hold 138 students, and 3 middle school classrooms hold 75 students, for a total design enrollment of 213.

Design enrollment, as specified by Act 188, differs significantly from capacity because, among other issues:

1. Capacity is modified for classrooms used for special education. Special education classrooms generally have significantly fewer students than regular education classrooms.
2. Capacity includes temporary classroom facilities. As defined by Act 188, design enrollment only consists of permanent school facilities.
3. Capacity includes adjustments based on program usage.

Classrooms not used for teaching or school level functions include classrooms that are used for complex and state offices and programs.

At the time of this writing, the most recent official classroom utilization data is from 2009-10.

Table 23
Classroom Utilization

School	Complex	2009-10 Enrollment	Design Enrollment	Classrooms Not Used for Teaching or School Level Functions
Aiea Elementary School	Aiea	323	759	2.50
Aiea High School	Aiea	1,183	1,825	1.00
Aiea Intermediate School	Aiea	583	1,075	0.50
Alvah Scott Elementary School	Aiea	475	920	1.00
Pearl Ridge Elementary School	Aiea	598	506	0.00
Waimalu Elementary School	Aiea	539	690	1.00
Webling Elementary School	Aiea	505	598	0.00
Baldwin High School	Baldwin	1,546	1,675	3.50
Iao School	Baldwin	868	897	0.00
Waihe'e Elementary School	Baldwin	764	736	1.00

Wailuku Elementary School	Baldwin	850	1,173	0.75
Campbell High School	Campbell	2,639	2,675	0.00
Ewa Beach Elementary School	Campbell	424	828	8.00
Ewa Elementary School	Campbell	980	897	3.00
Holomua Elementary School	Campbell	1,428	920	0.00
Ilima Intermediate School	Campbell	1,337	1,518	0.00
Iroquois Point Elementary School	Campbell	718	828	1.00
Kaimiloa Elementary School	Campbell	638	644	1.00
Keone`ula Elementary School	Campbell	801	828	0.00
Pohakea Elementary School	Campbell	549	690	1.00
Ahuimanu Elementary School	Castle	415	506	0.00
Castle High School	Castle	1,421	1,925	0.00
He'eia Elementary School	Castle	484	828	1.00
Kahaluu Elementary School	Castle	233	552	0.00
Kaneohe Elementary School	Castle	618	805	0.50
Kapunahala Elementary School	Castle	568	690	0.00
King Intermediate School	Castle	663	1,450	7.00
Parker Elementary School	Castle	283	966	8.00
Puohala Elementary School	Castle	232	690	6.00
Waiahole Elementary School	Castle	63	276	2.00
Dole Middle School	Farrington	789	1,225	1.00
Farrington High School	Farrington	2,637	3,150	1.00
Fern Elementary School	Farrington	492	667	1.00
Ka`ewai Elementary School	Farrington	325	690	2.00
Kalakaua Middle School	Farrington	994	1,250	0.00
Kalihi Elementary School	Farrington	314	690	3.00
Kalihi Kai Elementary School	Farrington	623	1,035	1.00
Kalihi Uka Elementary School	Farrington	219	575	1.30
Kalihi Waena Elementary School	Farrington	552	759	0.00
Kapalama Elementary School	Farrington	687	851	0.50
Linapuni Elementary School	Farrington	242	368	0.00
Puuhale Elementary School	Farrington	239	437	2.00
Hana High & Elementary	Hana	337	525	0.00
De Silva Elementary School	Hilo	381	414	0.00
Ha'aheo Elementary School	Hilo	166	184	0.50
Hilo High School	Hilo	1,310	1,925	3.00
Hilo Intermediate School	Hilo	492	1,400	6.00
Hilo Union School	Hilo	446	759	3.00
Kalaniana`ole Elementary and Intermediate School	Hilo	261	1,089	2.00
Kapiolani Elementary School	Hilo	388	713	1.50
Kaumana Elementary School	Hilo	231	299	0.00
Keaukaha Elementary School	Hilo	326	483	8.00
Honoka'a Elementary School	Honokaa	351	483	0.30
Honokaa High and Intermediate School	Honokaa	764	1,200	2.00
Paauilo Elementary school	Honokaa	276	355	0.00
Waikoloa Elementary & Middle School	Honokaa	748	757	0.00
Waimea Elementary School	Honokaa	622	805	3.30
Waimea Middle-PCS	Honokaa	622	475	0.00
Hauula Elementary School	Kahuku	262	506	3.50
Kaaawa Elementary School	Kahuku	139	92	0.00
Kahuku Elementary School	Kahuku	466	667	0.00
Kahuku High and Intermediate School	Kahuku	1,663	1,875	2.00
Laie Elementary School	Kahuku	617	736	2.00
Lanikai PCS	Kahuku	617	345	0.00
Sunset Beach Elementary School	Kahuku	407	161	0.50
Enchanted Lake Elementary School	Kailua	420	874	0.00

Kaelepulu Elementary School	Kailua	193	368	1.00
Kailua High School	Kailua	902	1,925	3.50
Keolu Elementary School	Kailua	175	598	3.00
Maunawili Elementary School	Kailua	404	690	3.30
Olomana School	Kailua	136	0	0.00
Pope Elementary School	Kailua	230	598	1.00
Waimanalo Elementary and Intermediate School	Kailua	501	1,041	1.00
Ala Wai Elementary School	Kaimuki	483	782	1.00
Aliiolani Elementary School	Kaimuki	241	644	4.00
Hokulani Elementary School	Kaimuki	368	483	0.00
Jarrett Middle School	Kaimuki	237	950	5.00
Jefferson Elementary School	Kaimuki	392	943	5.00
Kaimuki High School	Kaimuki	1,161	2,175	1.00
Kuhio Elementary School	Kaimuki	330	575	0.00
Lunalilo Elementary School	Kaimuki	489	851	0.50
Palolo Elementary School	Kaimuki	285	897	10.00
Washington Middle School	Kaimuki	856	1,450	0.00
Aina Haina Elementary School	Kaiser	640	736	1.50
Hahaione Elementary School	Kaiser	471	828	2.00
Kaiser High School	Kaiser	1,017	1,500	0.00
Kamiloiki Elementary School	Kaiser	369	736	0.00
Koko Head Elementary School	Kaiser	281	851	11.00
Niu Valley Middle School	Kaiser	783	950	0.10
Aikahi Elementary School	Kalaheo	495	690	0.00
Kailua Elementary School	Kalaheo	356	713	0.50
Kailua Intermediate School	Kalaheo	680	1,550	3.00
Kainalu Elementary School	Kalaheo	509	966	1.50
Kalaheo High School	Kalaheo	859	1,650	0.00
Mokapu Elementary School	Kalaheo	794	851	2.00
Kahala Elementary School	Kalani	443	736	0.00
Kaimuki Middle School	Kalani	867	1,675	0.00
Kalani High School	Kalani	1,137	1,825	7.50
Liholiho Elementary School	Kalani	356	621	0.00
Lili'uokalani Elementary School	Kalani	127	552	2.80
Waikiki Elementary School	Kalani	426	552	0.00
Wilson Elementary School	Kalani	550	644	0.00
Hanalei Elementary School	Kapaa	225	184	1.00
Kapaa Elementary School	Kapaa	827	1,219	1.00
Kapa'a High School	Kapaa	1,033	1,400	0.30
Kapaa Middle School	Kapaa	652	1,225	6.00
Kilauea Elementary School	Kapaa	327	368	1.00
Barbers Point Elementary School	Kapolei	513	920	5.00
Kapolei Elementary School	Kapolei	1,054	874	1.00
Kapolei High School	Kapolei	2,159	2,450	0.00
Kapolei Middle School	Kapolei	1,488	1,425	0.00
Makakilo Elementary School	Kapolei	508	690	0.00
Mauka Lani Elementary School	Kapolei	578	483	0.00
Kau High and Pahala Elementary	Kau	576	939	0.00
Naalehu Elementary & Intermediate School	Kau	356	414	0.00
Chiefess Kamakahelei Middle School	Kauai	913	1,500	1.00
Kauai High School	Kauai	1,198	1,625	2.00
King Kaumualii Elementary School	Kauai	545	897	2.50
Koloa Elementary School	Kauai	243	345	1.50
Wilcox Elementary School	Kauai	914	1,081	1.50
Kea'au Elementary School	Keaau	803	1,035	0.00

Keaau High School	Keaau	946	1,675	0.00
Keaau Middle School	Keaau	621	1,225	10.00
Mountain View Elementary School	Keaau	521	644	1.00
Holualoa Elementary School	Kealakehe	497	207	0.00
Kahakai Elem. School	Kealakehe	593	805	2.00
Kealakehe Elementary School	Kealakehe	946	759	2.50
Kealakehe High School	Kealakehe	1,610	1,800	0.00
Kealakehe Intermediate School	Kealakehe	850	1,225	1.80
Haiku Elementary School	Kekaulike	421	299	0.00
Kalama Intermediate School	Kekaulike	850	1,225	1.00
Kekaulike High School	Kekaulike	1,254	1,575	1.50
Kula Elementary School	Kekaulike	392	460	0.50
Makawao Elementary School	Kekaulike	471	598	0.00
Paia Elementary School	Kekaulike	227	483	0.00
Pukalani Elementary School	Kekaulike	508	552	0.00
Kohala Elementary School	Kohala	367	437	0.00
Kohala High School	Kohala	272	575	0.00
Kohala Middle School	Kohala	198	325	0.00
Honaunau Elementary School	Konawaena	128	230	0.00
Hookena Elementary School	Konawaena	131	230	0.00
Ke Kula 'o 'Ehunuikaimalino School	Konawaena	173	72	0.00
Konawaena Elementary School	Konawaena	576	759	0.00
Konawaena High School	Konawaena	669	1,350	3.00
Konawaena Middle School	Konawaena	454	750	4.00
Kamehameha III Elementary School	Lahaina	713	552	0.25
Lahaina Intermediate School	Lahaina	693	650	0.70
Lahainaluna High School	Lahaina	969	900	0.00
Nahienaena Elementary School	Lahaina	610	713	0.00
Lanai High and Elementary School	Lanai	542	1,132	0.00
Laupahoehoe High and Elementary School	Laupahoehoe	205	650	5.50
Hale Kula Elementary School	Leilehua	838	920	0.00
Helemano Elementary School	Leilehua	514	575	1.00
Iliahi Elementary School	Leilehua	420	690	0.00
Ka`ala Elementary School	Leilehua	428	690	1.50
Leilehua High School	Leilehua	1,900	2,000	2.00
Solomon Elementary School	Leilehua	1,161	966	0.00
Wahiawa Elementary School	Leilehua	492	920	3.33
Wahiawa Middle School	Leilehua	808	1,175	2.00
Wheeler Elementary School	Leilehua	436	851	1.00
Wheeler Middle School	Leilehua	780	1,025	0.00
Kahului Elementary School	Maui	956	874	0.50
Kamalii Elementary School	Maui	660	897	0.00
Kihei Elementary School	Maui	870	920	2.00
Lihikai Elementary School	Maui	970	736	1.00
Lokelani Intermediate School	Maui	569	625	0.00
Maui High School	Maui	1,815	1,425	1.00
Maui Waena Elementary School	Maui	1,054	1,050	0.00
Pomaikai Elementary School	Maui	542	1,012	0.00
Central Middle School	McKinley	407	1,075	6.00
Ka'ahumanu Elementary School	McKinley	582	782	0.00
Kaiulani Elementary School	McKinley	387	690	1.00
Kauluwela Elementary School	McKinley	364	644	0.00
Lanakila Elementary School	McKinley	403	713	1.00
Likelike Elementary School	McKinley	338	690	0.00
McKinley High School	McKinley	1,789	2,625	0.00
Royal School Elementary School	McKinley	330	529	0.00

Kipapa Elementary School	Mililani	639	736	1.00
Mililani High School	Mililani	2,460	2,200	1.50
Mililani 'Ike Elementary School	Mililani	1,072	828	0.00
Mililani Mauka Elementary School	Mililani	832	989	0.00
Mililani Middle School	Mililani	1,752	1,575	0.00
Mililani Uka Elementary School	Mililani	655	920	2.00
Mililani Waena Elementary School	Mililani	584	736	1.00
Kamaile Academy	Moanalua	431	736	0.00
Moanalua Elementary School	Moanalua	683	644	0.00
Moanalua High School	Moanalua	2,102	1,925	0.00
Moanalua Middle School	Moanalua	914	925	0.00
Red Hill Elementary School	Moanalua	431	736	2.00
Salt Lake Elementary School	Moanalua	791	897	6.00
Shafter Elementary School	Moanalua	163	460	2.60
Kaunakakai Elementary School	Molokai	229	552	0.00
Kilohana Elementary School	Molokai	105	184	0.00
Kualapuu PCS	Molokai	105	460	0.30
Maunaloa Elementary School	Molokai	61	230	0.00
Molokai High School	Molokai	334	625	0.00
Molokai Middle School	Molokai	171	325	0.00
Nanaikapono Elementary School	Nanakuli	882	1,334	0.00
Nanakuli Elementary School	Nanakuli	485	644	1.00
Nanakuli High and Intermediate School	Nanakuli	972	1,650	0.00
Keonepoko Elementary School	Pahoa	614	736	1.00
Pahoa Elementary School	Pahoa	410	345	0.60
Pahoa High School	Pahoa	717	1,550	0.00
Highlands Intermediate School	Pearl City	928	1,175	1.00
Kanoelani Elementary School	Pearl City	756	598	0.50
Lehua Elementary School	Pearl City	411	690	0.00
Manana Elementary School	Pearl City	397	552	1.00
Momilani Elementary School	Pearl City	415	368	0.00
Palisades Elementary School	Pearl City	368	759	0.00
Pearl City Elementary School	Pearl City	564	851	1.00
Pearl City High School	Pearl City	1,869	2,425	1.00
Pearl City Highlands Elementary School	Pearl City	389	690	0.00
Waiuu Elementary School	Pearl City	566	552	1.00
Aliamanu Elementary School	Radford	902	920	0.00
Aliamanu Middle School	Radford	715	1,075	2.00
Hickam Elementary School	Radford	627	690	0.00
Makalapa Elementary School	Radford	393	621	12.00
Mokulele Elementary School	Radford	435	690	1.00
Nimitz Elementary School	Radford	505	920	2.30
Pearl Harbor Elementary School	Radford	605	920	0.00
Pearl Harbor Kai Elementary School	Radford	672	874	0.00
Radford High School	Radford	1,188	1,800	3.00
Anuenue School	Roosevelt	378	667	0.00
Kawanakoa Middle School	Roosevelt	868	1,200	0.50
Lincoln Elementary School	Roosevelt	389	805	3.00
Ma'ema'e Elementary School	Roosevelt	652	851	0.00
Manoa Elementary School	Roosevelt	587	851	3.00
Noelani Elementary School	Roosevelt	468	460	0.00
Nuuanu Elementary School	Roosevelt	376	368	0.00
Pauoa Elementary School	Roosevelt	317	690	2.00
Roosevelt High School	Roosevelt	1,385	1,900	0.00
Stevenson Middle School	Roosevelt	642	1,225	2.50
Waialae Elementary PCS	Roosevelt	642	690	0.00
Waiakea Elementary School	Waiakea	840	989	0.00

Waiakea High School	Waiakea	1,226	1,875	5.50
Waiakea Intermediate School	Waiakea	864	1,100	0.00
Waiakeawaena Elementary School	Waiakea	746	851	0.00
Haleiwa Elementary School	Waialua	168	713	2.00
Waialua Elementary School	Waialua	529	552	0.00
Waialua High and Intermediate School	Waialua	609	1,200	3.00
Leihoku Elementary School	Waianae	853	874	1.00
Maili Elementary School	Waianae	772	782	1.00
Makaha Elementary School	Waianae	580	690	3.50
Waianae Elementary School	Waianae	583	989	1.00
Waianae High School	Waianae	1,909	2,250	0.00
Waianae Intermediate School	Waianae	875	1,325	1.00
Ele'ele Elementary School	Waimea	397	575	0.00
Kalaheo School	Waimea	513	598	0.00
Kekaha Elementary School	Waimea	340	460	0.00
Niihau School	Waimea	8	72	0.00
Waimea Canyon Middle School	Waimea	424	850	6.00
Waimea High School	Waimea	729	1,375	2.00
August Ahrens Elementary School	Waipahu	1,319	1,426	2.00
Honowai Elementary School	Waipahu	832	874	1.00
Kaleiopuu Elementary School	Waipahu	955	943	0.00
Waikele Elementary School	Waipahu	609	805	1.00
Waipahu Elementary School	Waipahu	975	943	2.00
Waipahu High School	Waipahu	2,458	2,425	0.00
Waipahu Intermediate School	Waipahu	1,230	1,575	0.00