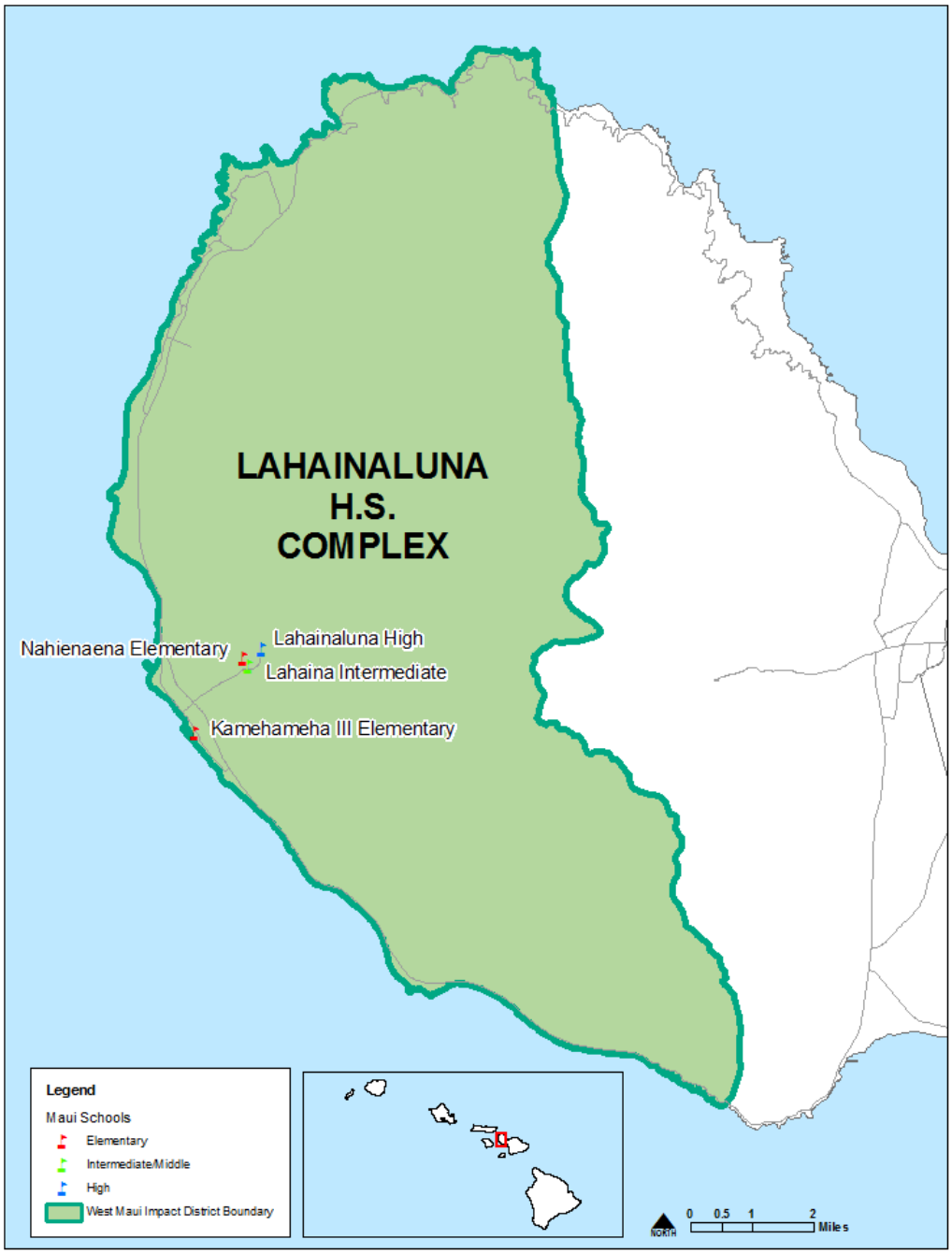
ANALYSIS OF THE WEST MAUI SCHOOL IMPACT DISTRICT



West 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 West Maui School Impact District on October 27, 2010 at Lahainaluna High School.

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

THE WEST 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 West 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 West 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 8,900 new residential units are proposed in the next 25-30 years within the Impact District. These new units will generate over 3,300 additional public school students who will attend area public schools. Please refer to Appendix A for list of proposed West Maui projects and their projected number of new units.

Over 3,300 new public school students over the next 30 years would require four to five new schools, with a total acreage of approximately 96 acres. The new law would result in developers providing approximately 64 of those school acres if, and when, every proposed project is completed (Table 12).

The total amount of impact fees generated from 8,950 residential units would be approximately $16 million (Table 12). 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 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 three to four. That growth slowed down in the past decade and a half, with the number of schools remaining at four.

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 West Maui comes close to the estimated 27,000 people, the DOE will be responsible for providing a number of new or expanded schools.

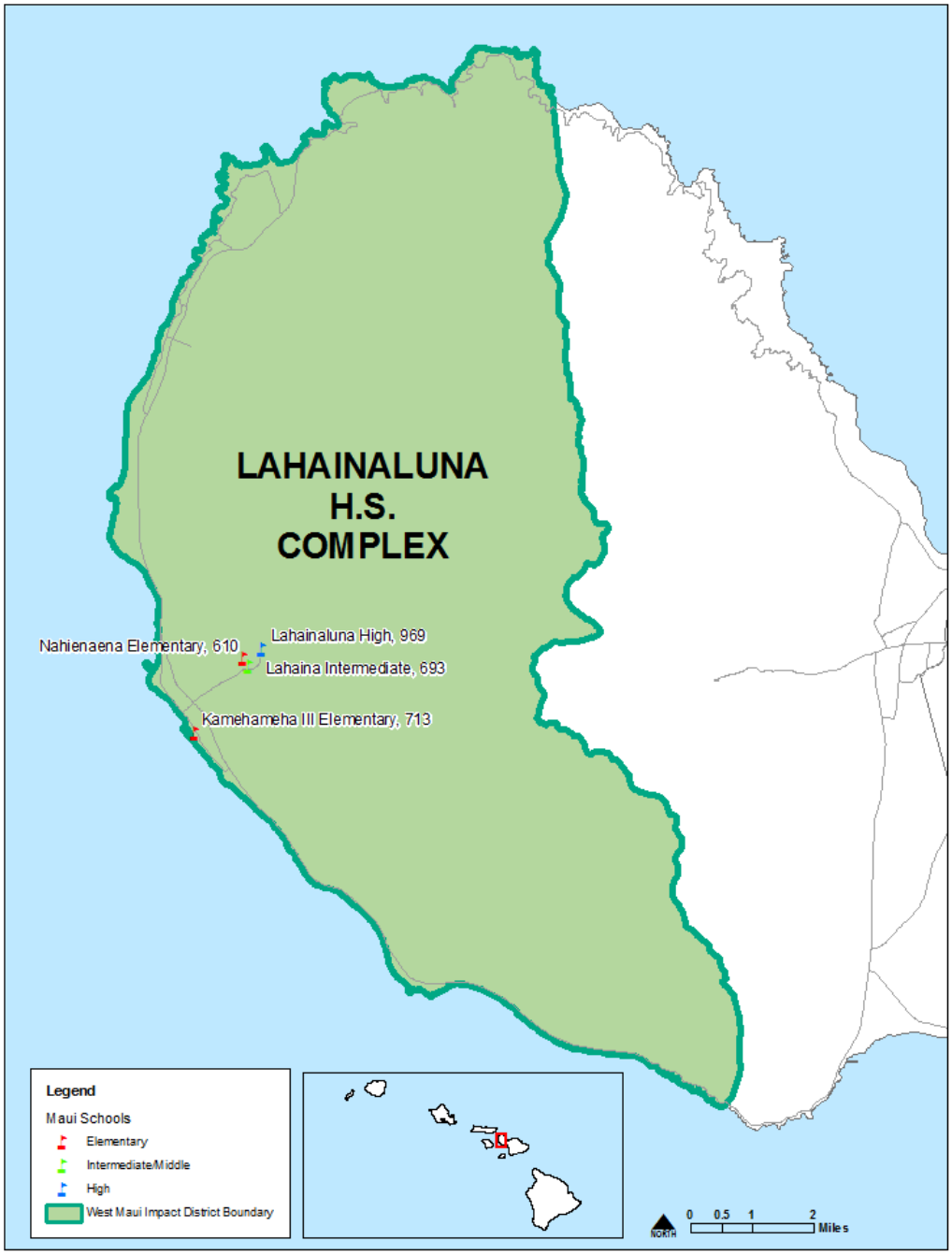
II. The West Maui School Impact District

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 West Maui development projects have represented their projects as communities for full-time, year-round residents.

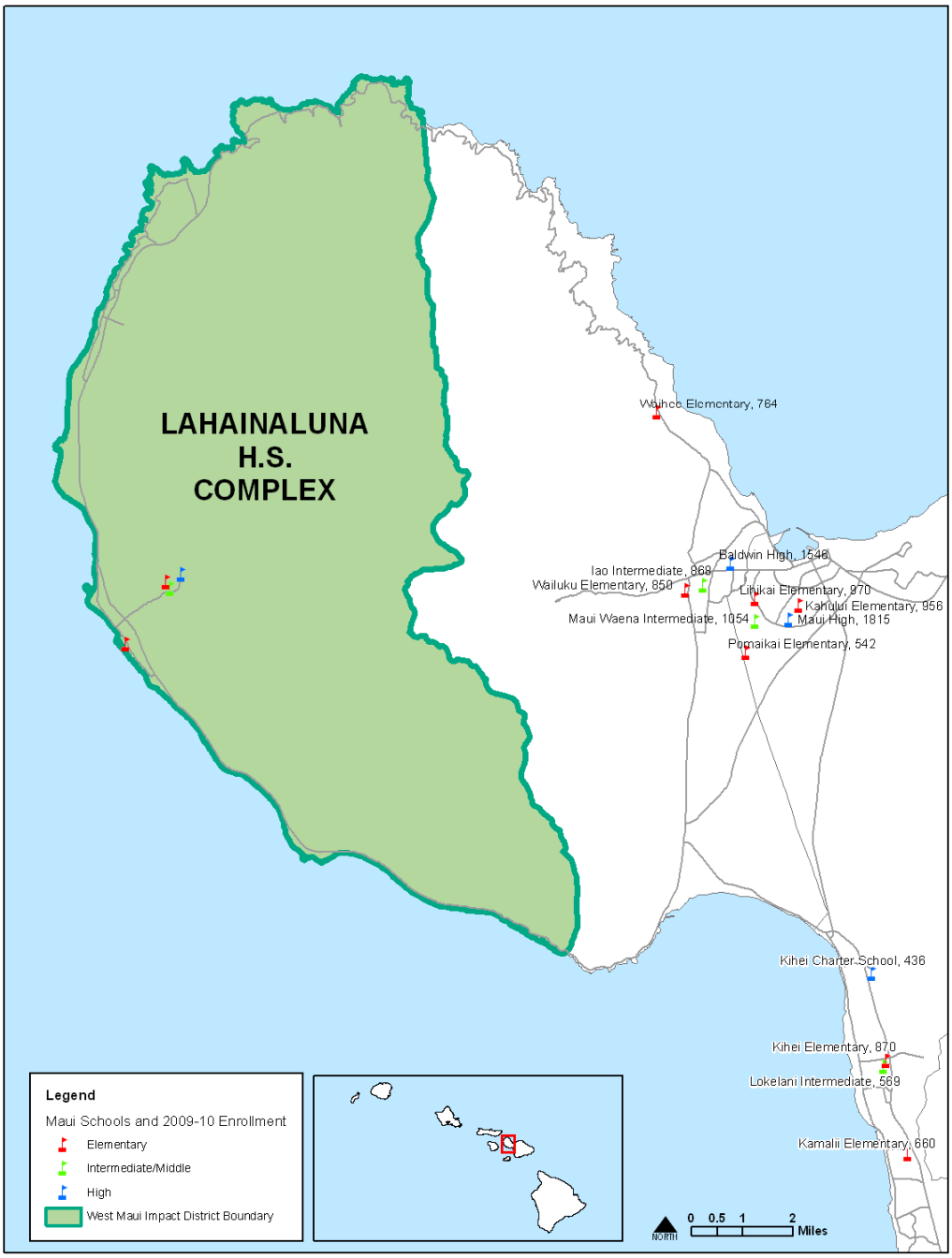
The analysis focuses on the direct impact of new development on West Maui schools. The boundaries the DOE selected for the Impact District are the existing school service boundaries of the Lahainaluna complex.

Figure 1
Map of the West Maui School Impact District, with Enrollment of Schools in District



West Maui School Impact District

Figure 2
Map of Schools Near the West Maui School Impact District. The labeled schools are not within the Impact District Itself.



Schools Near the West Maui School Impact District

Date: 8/26/2010

Description of the West Maui School Impact District

West Maui had substantial growth in the 1970s and 1980s. It has continued to grow since then, though at a somewhat slower rate. In 2005, West Maui had a population of 19,852.

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
West Maui		5,524	10,284	14,574	17,967	19,852

Source: Lahaina Community Plan, 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 West Maui increased by over 85%. While the *rate* of growth has slightly tapered off in recent years, Maui Island has continued to grow. Roughly 15% of Maui Island's population lived in West Maui in 2005.

Table 2
Population Projection for Maui Island and West 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%
West Maui	20,892	22,627	24,326	25,904	27,419	16.4%	12.7%

Source: Maui Island Plan, 2009 Draft

As detailed above, the Impact District is projected to increase in population by 31% between the present and 2030.

Enrollment in West Maui School Impact District

The Impact District is the service area of all the schools in the Lahainaluna Complex, which includes Kamehameha III and Nahienaena Elementary Schools, Lahaina Intermediate School, and Lahainaluna High School. Historical and projected enrollment figures from 1980-2015 are shown below.

Table 3
Historical and Projected Enrollment, West 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, 2009-2015
Lahainaluna Complex										
Kamehameha III	801	658	620	713	788	-143	-38	93	-88	75
Nahienaena		369	645	610	675	369	276	-35	610	65
Lahaina Intermediate	247	410	626	693	672	163	216	67	446	-15
Lahainaluna High	675	758	924	969	1,081	83	166	45	294	112
Lahainaluna Complex Total	*1,723*	*2,195*	*2,815*	*2,985*	*3,216*	*472*	*620*	*170*	*1,262*	*237*

Source: Department of Education

Public school enrollment in the Impact District has increased by over 60% from 1980 to 2000. During that period, one new school was completed: Nahienaena Elementary.

In the 2009-10 school year, 1,323 students in the Impact District were in elementary schools, 693 were in intermediate school, and 969 were in high school. Enrollment in the Impact District has increased by 1,269 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 3,200 students.

Projected Growth in the Impact District

The DOE predicts 8,950 additional residential units in proposed residential projects in the Impact District over the next 25 years. This includes 2,440 units of proposed housing in projects too early in their planning stages to determine the split between multi-family and single family units. For the purpose of this analysis, the undefined 2,440 units were split 50:50 between multi-family and single family units creating the totals for each type of housing listed below.

Table 4
New Units Projected in the West Maui District

Region	Single Family	Multi-Family	Total Units
Lahainaluna Complex	5,377	3,573	8,950

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
Lahainaluna Complex	2,688	644	3,332

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 number of units not yet defined as being either single family or multi-family were split equally and added to each category of housing.

A SGR is the average number of students that are expected per unit. For example, the Impact District's single family SGR totals 0.50. This means that, on average, the DOE expects 0.50 students per single family unit. Put another way, the DOE expects 50 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
West Maui Impact District through 2035

	Single Family SGR	Students in Single Family Units	Multi-Family SGR	Students in Multi-Family Units	Total
Total # units		5,377		3,573	
Elementary	0.22	1,183	0.09	322	1,505
Middle	0.12	645	0.04	143	788
High	0.16	860	0.05	179	1,039
Total Students		2,688		644	3,332

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 share[1] 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 West 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.

[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.

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

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

School type	(1) West 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	0.22	1	0.0156	0.00343	0.343
Middle	0.12	1	0.0110	0.00132	0.132
High	0.16	1	0.0306	0.00490	0.490
Acreage for West Maui Single Family Units				**0.00965**	**0.965**
				1 Multi-family unit	100 Multi-family Units
Elem	0.09	1	0.0156	0.00140	0.140
Middle	0.04	1	0.0110	0.00044	0.044
High	0.05	1	0.0306	0.00153	0.153
Acreage for West Maui Multi-family Units				**0.00337**	**0.337**

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 0.965 acres for every 100 single family homes and 0.337 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 West 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	0.00343	$1,527
Middle	$398,167	0.00132	$ 526
High	$248,420	0.00490	$1,217
Total Fee-in-Lieu of Land per Single Family Unit			**$3,270**
		Land Fee Per MF Unit (Acres)	Fee-in-Lieu per MF Unit
Elementary	$445,250	0.00140	$ 623
Middle	$398,167	0.00044	$ 175
High	$248,420	0.00153	$ 380
Total Fee-in-Lieu of Land per Multi-Family Unit			**$1,178**

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 West 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 1.30 for West Maui, as specified in Act 245.

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."

Table 11
Calculating the Construction Cost Component of the School Impact Fees:
Lahainaluna Complex

Type of School	(1) West 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 Lahaina	(5) Number of Units/ Project	Construction Costs per 1 unit of housing	10% of cost = fee amount
Elem	0.22	$35,357	0.846	1.30	1	$ 8,555	$ 855
Mid	0.12	$36,097	0.887	1.30	1	$ 4,995	$ 500
High	0.16	$64,780	0.856	1.30	1	$11,534	$1,153
Construction Fee for Single Family Units in Lahainaluna Complex							**$2,508**
Elem	0.09	$35,357	0.846	1.30	1	$3,500	$ 350
Mid	0.04	$36,097	0.887	1.30	1	$1,665	$ 167
High	0.05	$64,780	0.856	1.30	1	$3,604	$ 360
Construction Fee for Multi-Family Units in Lahainaluna Complex							**$ 877**

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;

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

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 7-11 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 8,900 additional residential units and over 3,300 new public school students will require that developers contribute a total of 63.93 acres and over $16 million in construction impact fees. See Table 12, below.

Table 12
Estimate of Total Impact Fees for West Maui School Impact District, Based on Projected Number of New Units

Complex	Unit Type	Units	Total Land Fee (acres)	Total Construction Fee
Lahainaluna	Single Family	5,377	51.89	$13,485,516
	Multi-Family	3,573	12.04	$ 3,133,521
Total		8,950	63.93	$16,619,037

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 13) may be larger than the historic average acreage (Table 7) used to calculate the fee amount.

Table 13
New BOE Policy on Acreage and Enrollment

	Usable[4] 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 four and five new schools, with a total land requirement of approximately 96 acres. As calculated in Table 12 above, developers would be required to provide

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

approximately 64 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 14
New West 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	1,505	3	2	.020	30
Middle	788	1	1	.023	18
High	1,039	1	1	.046	48
Total	3,332	5	4		96

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 8,900 new residential units (Appendix A), which will generate over 3,300 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 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.

Nahienaena Elementary, Lahaina Intermediate and Lahainaluna High School have 2009-2010 enrollments greater than their 2009-2010 facility capacity. Kamehameha III Elementary school is close to its facility capacity, as shown below.

Table 15
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
Kamehameha III	Elem	728	691	95%	24	14	36.8%
Nahienaena	Elem	585	627	107%	31	7	18.4%
Lahaina	Middle	522	693	133%	26	11	29.7%
Lahainaluna	High	903	990	110%	36	15	29.4%

Source: DOE data and 2007 Statewide School Impact Fee Report

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

Table 16
2009-2010 Enrollment and Facility Capacity by School Level

	Facility Capacity, 2009-10	Enrollment, 2009-10	% of Existing Capacity
Elementary	1,313	1,318	100%
Middle	522	693	133%
High	903	990	110%

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 Wailuku Elementary and Pomaikai Elementary could only accommodate students from West 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 17
Some Commute Times to Schools Serving the District

Route	Miles	Time
Kahana to King Kamehameha III Elementary	7.8	17 minutes
Kaanapali to Lahaina Intermediate	5.2	18 minutes
Olowalu to Lahainaluna High	7.4	20 minutes

There is a small amount of excess capacity in Kamehameha III, but again not sufficient to accommodate the number of additional students expected in the West 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 West Maui as a school impact district, the DOE is studying Central Maui as a school impact district. Any current excess capacity in Central Maui schools is projected to disappear based on plans for residential development projects in Central Maui.

Busing and Redistricting to Relieve Overcrowded Schools
As discussed above, due to the distance between the Lahainaluna Complex and the Central Maui schools, 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 West 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 rules[5] 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 Act[6] permit students from failing schools to transfer to schools in good standing. There have been very few requests in West Maui for transfers based on the federal Act.

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 are no charter schools in West Maui.

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

[5] *Hawaii Administrative Rules*, Title 8, Chapter 12, Compulsory Attendance Exceptions
[6] Public Law 107-110

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 18 has a list of the proposed projects in West 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 18
Proposed West Maui Projects and Proposed Number of Units

Project	Owner/Developer	Future Units To Be Built		
		SF	MF	Unknown
Lahainaluna High				
Hoonanea	Horton	0	100	0
Honua Kai	Intrawest	0	375	0
Honokowai	Lokahi	0	55	0
Kaanapali 2020	Kaanapali Devl.	0	0	940
Kaanapali Residences	Landtec, Inc	18	18	0
Kahana Wai	Smith (KSD)	4	0	0
Kahoma	Lokahi	31	0	0
Kahoma Rental	Lokahi	0	24	0
Kahoma Residential Subdivision	West Maui Land Co	57	0	0
Lanikeha	South Course Dev.	132	0	0
Lei`alii 1B	DHHL	253	0	0
Lei`alii Balance of Project	HHFDC	2,000	1,000	0
Lokahi Kuhua	Maui Co.	12	0	0
Naplili 10-lot	Landtec, Inc	20	0	0
Olowalu	Olowalu Elua Associates, LLC and Olowalu Ekolu, LLC	0	0	1,500
Opukea at Lahaina	Horton	0	81	0
South Beach Mauka	AMFAC/JMB	243	0	0
Various ML&P Projects	ML&P	1,087	284	0
Wainee	Kaanapali Devl.	300	416	0
Total		4,157	2,353	2,440

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

Table 19
Student Generation Rate Calculation for the West Maui Impact District

Grade Levels	Existing Units in West Maui District		Students Enrolled in the West Maui District		Student Generation Rates	
	Single Family Units	Multi-Family Units	Single Family Units	Multi-Family Units	Single Family	Multi-Family
Elementary	4,233	4,133	930	381	0.22	0.09
Middle	4,233	4,133	512	171	0.12	0.04
High	4,233	4,133	665	197	0.16	0.05
Total	4,233	4,133	2,107	749	0.50	0.18

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

To see the calculations behind these figures, please see Table 8 the land fee, Table 9 for the fee-in-lieu of land, and Table 11 for the construction fee.

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

Table 20
West Maui Fee Schedule

# Units	Est # of Total Students	Construction Fee		Land Amount		Fee-in-Lieu of Land		Construction and Fee-in-Lieu
Single Family		**Per Unit**	**Total**	**Acres Per Unit**	**Total Acres**	**Per Unit**	**Total**	
1	0.5	$2,508	$ 2,508	0.009648	0.009648	$3,270	$ 3,270	$ 5,778
2	1	"	$ 5,016	"	0.019296	"	$ 6,540	$ 11,556
5	2.5	"	$ 12,540	"	0.04824	"	$ 16,350	$ 28,890
100	50	"	$ 250,800	"	0.9648	"	$ 327,000	$ 577,800
1000	500	"	$2,508,000	"	9.648	"	$ 3,270,000	$ 5,778,000
Multi-Family								
1	0.18	$877	$ 877	0.003374	0.003374	$1,178	$ 1,178	$ 2,055
2	0.36	"	$ 1,754	"	0.006748	"	$ 2,356	$ 4,110
5	0.9	"	$ 4,385	"	0.01687	"	$ 5,890	$ 10,275
100	18	"	$ 87,700	"	0.3374	"	$ 117,800	$ 205,500
1000	180	"	$ 877,000	"	3.374	"	$ 1,178,000	$ 2,055,000

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 21
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
Iroqouis 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 Elelmentary 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
Waiau 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