

WEST CONTRA COSTA UNIFIED SCHOOL DISTRICT 7-11 Committee Meeting

October 20, 2022

6:00 PM

Staff: Luis Freese (Associate Superintendent, Operations) & Robert McEntire (Associate Superintendent, Chief Business Official)

<u>Agenda Documentation</u>: If available, backup documentation for items on the Agenda will be posted on the district website at the time the agenda is posted. <u>District Committees webpage</u> & <u>District 7-11 Committee webpage</u>

<u>Meeting Locations</u>: As authorized by the Governor's Emergency Executive Order issued on March 17, 2020, the West Contra Costa Unified School District will conduct the 7-11 Committee meetings in person and via video conference/teleconference until further notice.

Physical Location: 1400 Marina Way S, Richmond, CA 94804.

The meeting will be streamed via Zoom using the following link:

Please click the link below to join the webinar: https://wccusd.zoom.us/j/91992616214

Or via Telephone: +1 669 444 9171 webinar ID 919 9261 6214

Participating in Committee Meetings:

Due to the ongoing COVID-19 crisis, the manner in which meetings are conducted has changed. Thank you in advance for your understanding and cooperation as we experiment with new ways to conduct the people's business while allowing for maximum participation and adhering to our values of respect and safety for the community.

This meeting will provide public comment opportunities through the Zoom app or by telephone. To indicate your desire to speak on an agenda item, "raise your hand" by clicking on the appropriate icon in the Zoom app or by pressing *9 if accessing the meeting by phone. In order to be recognized to speak, your hand must be "raised" before public comment begins for the item.

Due to the Brown Act, Committee members cannot discuss items that are not on the agenda and do not usually respond to items presented in Public Comment.

Order of Business: ORDER OF BUSINESS MAY BE CHANGED WITHOUT NOTICE

MEETING AGENDA

A. OPENING PROCEDURES

- A.1 Roll Call
- A.2 Approval of Agenda
- A.3 Approval of Meeting Minutes: July 28, 2022, & September 13, 2022
- A.3 Next Meeting: November 3, 2022, & November 17, 2022

B. PUBLIC COMMENT

B.1 Public Comment

Members of the public are invited to speak on any matter related to the 7-11 Committee at this time. Members of the public may speak on individual items of interest in the agenda as the items are discussed.

D. DISCUSSION ITEMS

D.1 Review of Disposition of Real Property by a School District. Presented: Nancy Taylor, Orbach, Huff & Henderson Nancy will present the different options for the disposition of surplus property.

D.2 Review of Properties and Options. Presented: Scott Sheldon & Barry Schimmel, Terra Realty

Terra Realty will lead a discussion on the four properties and present the different types of consideration. The Committee will review the information previously provided for the four sites and discuss options and recommendations for each.

E. ACTION ITEMS

- E.1 Election of 7-11 Committee officers. Moderated: Staff
- a. Nominations and vote for Chairperson
- b. Nominations and vote for Vice Chairperson
- c. Nominations and vote for Secretary



WEST CONTRA COSTA UNIFIED SCHOOL DISTRICT

7-11 Committee Meeting July 28, 2022 6:00 PM

Staff: Luis Freese (Associate Superintendent, Operations) & Robert McEntire (Associate Superintendent, Chief Business Official)

<u>Agenda Documentation</u>: If available, backup documentation for items on the agenda will be posted on the district website at the time the agenda is posted. <u>District Committees webpage</u> & <u>District 7-11 Committee webpage</u>

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MEETING MINUTES https://youtu.be/chUydmNdB7A

A. OPENING PROCEDURES

A.1Welcome & Introductions. (District Staff & 7-11 Consultants, Committee Members)Staff: Luis Freese, Robert McEntire, Melissa PayneConsultants: Sout Sheldon, Barry Schimmel, Nancy TaylorCommittee: Don Gosney, James Henry-Sanders, Summer Sigler, Samantha Ann Torres, Doreen ChanA.2Approval of AgendaAgenda was approvedA.3Future Committee Meeting Dates (August 25, 2022, September 15, 2022, October 13, 2022)

B. PUBLIC COMMENT

B.1 Public Comment

Members of the public are invited to speak on any matter related to the 7-11 Committee at this time. Members of the public may speak on individual items of interest in the agenda as the items are discussed.

Public Comments: No public comment

D. DISCUSSION ITEMS

D.1 Presentation of the 7-11 Committee Process & Brown Act. Presented: Nancy Taylor, Orbach Huff & Henderson Nancy provided an overview of the legal process for the Committee and the disposition of surplus property. She also provided an overview of the Brown Act requirements and considerations to be mindful of throughout the operation of the Committee.

D.2 Preliminary Review of the Properties Under Consideration. Presented: Scott Sheldon & Barry Schimmel, Terra Realty Terra Realty presented a brief overview of the properties under consideration, Seaview, Harmon Knolls, Adams, and Portola.

Adams: Site Location: 5000 Paterson Circle, Richmond, CA 94805 Size: 8.85. Acres - Closed in 2009 Zoning: Government / Public use The site is improved with the original school buildings Hayward Fault runs through part of this school site

Harmon Knolls: Location: 2853 Groom Drive, Richmond, CA 94806 Size: 8.87 Acres - Closed in 2003 Zoning: Government / Public use The property is vacant land Park is located right next to the property.

Portola Site: Location: Navellier Street Size: 8.87 Acres - Closed in 2010 The property is vacant land Possible landslide issues due to the type of soil. This property has views from the Bay Bridge, Richmond bridge, and SF bridge.

Seaview Site: Location: 2000 Southwood Drive, San Pablo, CA 94806 Closed in 2005 / 2009 - Zoning: Government / Public Use The property is vacant land Railroads are located on either side of the school site. Two separate parcels comprise this site. One of the parcels has a footbridge for pedestrians and limited vehicular access. Deed restrictions are placed on the original school site limiting the use of single-family homes. A change in zoning is possible if 50% or more of the surrounding community vote and agree to a change.

There was a discussion about coordinating a field trip to each site. However, the coordination and logistics will make this difficult.

One of the members had left the meeting, which put the committee member number at four members. As a result, there was no quorum, and the officer selection process was postponed.

E. ACTION ITEMS

- E.1 Election of 7-11 Committee officers. Moderated: Staff
- a. Nominations and vote for Chairperson
- b. Nominations and vote for Vice Chairperson
- c. Nominations and vote for Secretary

E.2 Calendar for Future Committee Meeting Dates. Presented: Committee Chairperson

- a. Discussion of Future Committee Meeting Dates.
- b. Motion to Approve Future Meeting Dates and Vote



WEST CONTRA COSTA UNIFIED SCHOOL DISTRICT

7-11 Committee Meeting September 13, 2022 6:00 PM

Staff: Luis Freese (Associate Superintendent, Operations) & Robert McEntire (Associate Superintendent, Chief Business Official)

<u>Agenda Documentation</u>: If available, backup documentation for items on the Agenda will be posted on the district website at the time the agenda is posted. <u>District Committees webpage</u> & <u>District 7-11 Committee webpage</u>

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Order of Business: ORDER OF BUSINESS MAY BE CHANGED WITHOUT NOTICE

MEETING MINUTES https://youtu.be/AUVRu2OHX4Y

A. OPENING PROCEDURES

 A.1
 Roll Call

 Staff: Luis Freese, Robert McEntire, Melissa Payne

 Consultants: Scott Sheldon, Barry Schimmel

 Committee: Don Gosney, James Henry-Sanders, Summer Sigler, Samantha Ann Torres, Doreen Chan, Trey Holland

 A.2
 Approval of Agenda

 Agenda was approved

 A.3
 Next Meeting: September 27, 2022

B. PUBLIC COMMENT

B.1 Public Comment

Members of the public are invited to speak on any matter related to the 7-11 Committee at this time. Members of the public may speak on individual items of interest in the agenda as the items are discussed.

Public Comments: No public comment

D. DISCUSSION ITEMS

D.1 District Real Property Assessment. Presented: Scott Sheldon & Barry Schimmel, Terra Realty

Terra Realty will present all four properties with photos, maps, property history and documentation as well as an opinion of value.

Adams- Unincorporated Contra Costa County

General Plan- Current: Public/Semi-Public; Proposed: To be Determined Current Zoning- R-6

- There are approximately 90,000sf of existing buildings on the site.
- Patterson Circle is owned by the city.
- Site is in an active fault zone.

Proposed Land Use Assumptions:

- Low-density single-family homes on approximately 6 acres of useable land.
- Assumed 6 units/ac or approximately 36 new homes.
- Demo cost, including hazmat: TBD
- Comps in the area indicate a range of values of \$25-\$35/sf: \$6.5M \$9.1M
- Demo costs would be deducted from this range of values.

Harmon Knolls- City of Richmond

General Plan Current - Parks and Recreation

Zoning- Current Parks and Recreation

- District acquired title to this property in 1965.
- Various utility easements with right of access: PG&E & others.
- Certain water rights are reserved.
- Conditions, Covenants & Restrictions restricting land use to residential and business use per designation on City zoning maps.
- Building set-back restrictions on portions of the property.
- Slope easement and lack of *abutters rights*.
- Provision for multi-family housing on the school site if not used for school purposes stated in the CC&Rs.
- Proposed Land Use Assumptions:
- Medium Density Townhome project on approximately 5 acres of the site
- Assumed 18 units/ac or approximately 90 new townhomes.
- Further discussions with the City of Richmond needs to occur regarding the additional 3.78 ac.
- Comps in the area indicate a range of values of \$35-\$39/sf: **\$7.6M \$8.5M.**

Portola Site- El Cerrito

General Plan – Institutional & Utility

Zoning – Public/Semi Public

- Site is vacant.
- Site has drainage ditches running through the property.
- Site challenges: Geotechnical and Landslide Site Conditions
- Views of the Bay
- Large PG&E substation across the street from the site.
- City Park on the south side of the site

Proposed Land Use Assumptions:

- Medium Density Townhome project on approximately 5 acres of useable land
- Assumed 15 units/ac or approximately 75 new townhomes
- Subject to further geo-tech research
- Comps in the area indicate a range of values of \$75-\$90/sf: **\$17M \$20M**

Seaview Site- Unincorporated Contra Costa County

General Plan – Public/Semi Public; Proposed RMH Medium Density

Zoning – H-I & R-6

- Two separate parcels.
- Parcel 1 is where the old school was located. This parcel is 4.6 Acres.
- Parcel 2 is separated by a creek. This parcel is 3.3 acres.
- There is limited car access for Parcel 2, one way in and out of the site on a private road.
- Parcel 2 may be subject to a rise in sea level over time.
- District acquired title to this property in 1968.
- The school was built in 1972.
- No recorded public access to a portion of the property (field area).
- Various utility easements (wet & dry) on portions of the property.
- CC&Rs limiting the land use to single-family residential.
- Impact of two railroad tracks adjoining the properties.

Seaview Opinion of Value

- Low Density Single Family Homes on approximately 4.6 acres of the site.
- Assumed density to match the original Parcel Map showing approximately 21 new homes.
- No assumed value at this time for the property south of Garrity Creek.
- Comps in the area indicate a range of values of \$15-\$18/sf: \$3M \$3.6M

Public Comment

Rachel Lem Senior Park Specialist from the East Bay Regional Park District, participated in the discussion as a member of the public. They are working on a Bay trail connection from Point Pinole and regional park and regional shoreline trails through Wilson Point. Looking for a potential trail easement linearly along the northern side of the parcels that would pass through the property to connect the trails.

There was a general discussion about the information presented. There was also a discussion about arranging a field trip for the Committee members to visit each site. Staff to review and get back to the Committee on this matter.

E. ACTION ITEMS

Postponed

- E.1 Election of 7-11 Committee officers. Moderated: Staff
- a. Nominations and vote for Chairperson
- b. Nominations and vote for Vice Chairperson
- c. Nominations and vote for Secretary

7-11 Committee Meeting October 20, 2022



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Disposition of Real Property by a School District

Disposition of Surplus Property: 7-11 Committee Report

Committee Report should include:

- A determination regarding the highest and best use of property based, in part, on consultation with local zoning authorities to determine potential permissible uses
- Listing of acceptable uses
- (*Optional*) Information based on a District-obtained appraisal of the property to assist in determination of the most profitable use and fair market value; and
- (*Optional*) Information based on a District-obtained title report to evaluate the effect of any restrictions, covenants or reversionary clauses.
- **Report educates the Board on Committee's work**
- □ Following recommendations from Committee, Board adopts a resolution regarding intended disposition of the property, if any.

Disposition of Surplus Property: Pre-Bid Statutory Requirements

- Now the District's Board can sell to the high bidder, right? (not quite yet . . .)
 - Public Offerings and Notice
 - (Optional) Offer to Child Care Development Agency
 - Vacant Classrooms to COE / SELPA
 - Naylor Act / Recreational Property

Disposition of Surplus Property: Public Offerings

- Notice to Local Planning Agency
 - District must provide notice to the local planning commission of its intent to sell or lease property. The planning commission has 40 days to "report" on the District's intention.
- □ Make offer for sale or lease with option to purchase at fair market value:
 - In writing to the following:
 - Director of General Services State of California
 - □ UC Regents
 - □ Trustees of the CSU
 - □ City in which property is located
 - □ County in which property is located
 - □ Public housing authority in the county where property is located
- By *public notice* addressed to any public district, public authority, public agency, public corporation, or any other political subdivision in the state, federal government, and to nonprofit charitable corporations by publication of notice of intent to sell or lease the property in a newspaper of general circulation in the District once a week for 3 successive weeks.

Disposition of Surplus Property: Public Offerings

- Any public entity has 60 days from the date of the third publication to notify the District of its intent to purchase or lease the property.
- If the parties do not agree on mutually satisfactory terms, the District may proceed to public bidding of the property.
- If the District receives offers from more than one public agency, the Board may exercise its discretion to determine which offer to accept and may negotiate the terms of acceptance.

Disposition of Surplus Property: Vacant Classrooms to COE / SELPA

- If the District intends to *lease vacant classrooms*, Board must first adopt Resolution of Intention and offer the classrooms to special education programs provided by other districts within its SELPA or by the County Office of Education
- The COE and the SELPA have 60 days to respond to the District's offer.

Disposition of Surplus Property: Naylor Act / Recreational Property

- □ If all or a portion of the property consists of land that has been used:
 - for at least 8 years
 - for playground, playing fields, or other outdoor recreational purposes
 and
 - is open space particularly suited for recreational purposes, the sale or lease must be treated in accordance with the Naylor Act.
- **D** The District must offer the property to:
 - (a) the City where the property is located
 - (b) any park or recreation district
 - (c) any regional park authority
 - (d) the county in which the property is located
- □ These agencies have 60 days to respond to the District's offer.

Disposition of Surplus Property: Naylor Act / Recreational Property

- Sale and Lease Price is limited by Education Code 17491
- The District may retain any portion of the school site containing structures or buildings, together with adjacent land necessary to avoid reducing the value of the land containing the buildings to less than 50% of fair market value.

Disposition of Surplus Property: Naylor Act / Recreational Property

(Separate from the Naylor Act)

- Make written offer for sale or lease with option to purchase for park, recreational or open space purposes (if the property is suited for such purposes):
 - To any park or recreation department of the city and county in which the property is situated;
 - To any regional park authority with jurisdiction over the property; and
 - To any applicable State Resource Agency

Disposition of Surplus Property: Formal Bidding

- □ If no offers are received by public entities or no agreement is reached with a public entity, then move to public bidding. (Ed. Code § 17464)
- **Formal Bidding**. Steps for formal bidding for highest price.
 - Board adopts resolution of intent to lease or sell which must include property description, minimum price, terms and conditions of sale or lease, and date bids will be considered. (Ed. Code § 17466)
 - District must provide notice to previous owner (Ed. Code § 17470)
 - District must post and publish notice of bid (Ed. Code § 17469)
 - Bid opening Occurs on day and time set forth in the resolution (Ed. Code § 17473)
 - Open session bid opening
 - Oral bids also considered

Disposition of Surplus Property: Formal Bidding: Use of Proceeds

- <u>Sale</u> Proceeds Must be Used in Specific Ways.
- Lease Proceeds May be Used in Any Way the Board Directs.

Alternative (Exceptions) to Surplus Property Process

- □ Joint Use (Ed. Code § 17527, et seq.)
- □ Joint Occupancy (Ed. Code § 17515, et seq.)
- □ Property Exchange (Ed. Code § 17536, et seq.)
- □ Workforce Housing (Ed. Code § 17391(b))
- Facilities Not Operated/Constructed for School Use (Ed. Code § 17391(c))
- □ Waiver Process (Ed. Code § 33050)
- □ Fee Generating Facilities (Gov. Code § 5956, et seq.)
- □ Community Recreation Act (Ed. Code § 10910, et seq.)

Alternatives to Surplus Property Process: Joint Use

- □ Ed. Code section 17527, et seq.
- District can lease vacant space in operating school buildings to other school districts, education agencies, government agencies, nonprofit institutions, private agencies, businesses, and individuals, under certain conditions.
 - 5-year term limit
 - $\square \quad \text{Exception} \rightarrow 5 \text{-year terms does not apply to agreements in which capital outlay} improvements are made on school property for park and recreation purposes by public entities and nonprofit corporations.}$
 - □ Fair Market Rent (Public entity exception)
- Prior to entering into a Joint Use Lease Agreement, the Board must make the following findings

 that the proposed use will not:
 - Interfere with the educational program or activities of any school or class;
 - Unduly disrupt the residents of the neighborhood; and
 - Jeopardize the safety of children in the school.

Alternatives to Surplus Property Process: Joint Occupancy

- □ Ed. Code section 17515, et seq.
- Joint occupancy lease agreements for up to 99 years allow the District to lease to any private person, firm or corporation. The District maintains a presence on the site.
- □ **Board Adopts Resolution of Intention (ROI)**. Before advertising and issuing proposals, the Board must adopt an ROI to consider proposals.
- Publish the ROI and Issue Proposals. After the Board adopts the ROI, the District must publish the ROI once a week for three (3) weeks.
- □ Hold the Public Meeting Advertised in the ROI. This meeting must be not less than 90 days after adoption of the ROI.
- □ Board to select the proposal that "best meets the needs of the District".

Overview of the Surplus Property Process Alternatives to Surplus - Exchange

- □ Ed Code section 17536, et seq.
- The District may exchange any of its real property for real property of another entity.
- Any exchange shall be upon terms the parties may agree and may be entered into without complying with other disposition requirements.
- Board shall adopt, by a 2/3 vote, a resolution declaring its intention to exchange the property.
- Obtain appraisals, conduct due diligence, consider local zoning impacts

Overview of the Surplus Property Process Alternatives to Surplus

- □ Ed Code § 17391(b) Workforce Housing
 - Board may elect not to appoint a 7/11 committee for the sale, lease, or rental of property to be used for teacher or school district employee housing.
- Ed. Code § 17391(c) Not Operated/Constructed for School Use
 - Board may elect not to appoint a 7/11 committee for property that has not previously operated or was not constructed as an early childhood education facility or K-12 facility.

Overview of the Surplus Property Process Alternatives to Surplus

- □ Gov. Code § 5956, et seq. Fee-Generating Facility
- District may solicit proposals and enter into agreements with private entities for the design, construction, or reconstruction of certain types of fee-producing infrastructure projects.
 - "Fee-producing infrastructure project" means that it will be paid for by the persons or entities benefited by or utilizing that facility.
 - Private entity selected by competitive negotiation process, not by formal bidding.
 - Maximum Term of 35 Years.

Overview of the Surplus Property Process Alternatives to Surplus

- □ Ed. Code § 10910, et seq. Community Recreation Act
 - District can lease buildings, grounds and equipment to any other "public authority" for community recreational purposes. (Ed. Code §10910.)
 - "Public authority" is a "public corporation or district having authority to provide recreation." (Ed. Code § 10901)
 - Term of lease <u>not</u> limited to 5 years.
 - District <u>can</u> charge for use of fields.

Nancy Taylor

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7-11 COMMITTEE

DISTRICT REAL PROPERTY ASSESSMENT MEETING #3



PRESENTED BY TERRA REALTY ADVISORS, INC. OCTOBER 20, 2022







ADAMS Unincorporated Contra Costa County









ADAMS






ADAMS MIDDLE SCHOOL SITE

GEOTECHINAL AND GEOLOGIC SUMMARY

The site is on an active fault zone.

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- To build on the site would require approval from the Division of the State Architect and California Geological Society.
- Since the original school construction, earth has been moved and infill soil present creating landslide deposits.
 - Further construction on the site would require test borings and ground water conditions to identify slope related concerns.

Summary of Alan Kropp and Associates, Inc.

March 9, 2009 Report

ADAMS OPINION OF VALUE

Proposed Land Use Assumptions:

- I. Low Density Single Family homes on approximately 6 acres of useable land
- 2. Assumed 6 units/ac or approximately 36 new homes
- 3. Subject to further geo-tech research
- 4. Demo cost, including haz-mat:TBD

Comps in the area indicate a range of values of \$25-\$35/sf: **\$6.5M - \$9.1M** Demo costs would be a deduct from this range of values

ADAMS DISCUSSION:

- Is this site surplus to the District educational needs?
- If recommendation is to surplus the site, what are the follow up recommendations?
 - Use the property to create a new source of income to the WCCUSD
 - Work with Contra Costa Board of Supervisors to rezone the property to maximize value and potential revenue to WCCUSD
- Other recommendations? Naylor Act considerations

Harmon Knolls City of Richmond







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HARMON KNOLLS



GENERAL PLAN CURRENT PARKS AND RECREATION ZONING CURRENT PARKS AND RECREATION

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HARMON KNOLLS OPINION OF VALUE

Proposed Land Use Assumptions:

- I. Medium Density Townhome project on approximately 5 acres of the site
- 2. Assumed 18 units/ac or approximately 90 new townhomes
- Further discussions with the City of Richmond need to occur regarding the additional
 3.78 ac

Comps in the area indicate a range of values of \$35-\$39/sf: \$7.6M - \$8.5M

HARMON KNOLLS:

- Is this site surplus to the District educational needs?
- If recommendation is to surplus the site, what are the follow up recommendations?
 - Use the property to create a new source of income to the WCCUSD
 - Recommend WCCUSD work with the City of Richmond to address the 3.78-acre park site.
- Other recommendations? Naylor Act considerations

PORTOLA City of El Cerrito

21

Portola Site





23

PORTOLA

UNIX I



Agenda Item No. 6(B)

Parcel Detail Parcel Number : 50318 Address : 1021 I

OS-N

Year Built : Acres : 2.008 Land Square Feet : 87473 General Plan : Institu Zoning : PS Hazard Fault Zone : Not A Free Trimming Rotation : Tire Severity Zone : Not A Hazard Soils Zone : Not A Hazard Soils Zone : X In FEMA flood zone : No

Commands

General Plan Designations

TOHIMU TOMIMU Very Low Density Low Density Medium Density High Density Commercial Institutional & Utility Parks & Open

GENERAL PLAN CURRENT INSTITUTIONAL & UTILITY

Portola





Portola

Cerrito Vista Park

OS-N

PORTOLA OPINION OF VALUE

Proposed Land Use Assumptions:

- I. Medium Density Townhome project on approximately 5 acres of useable land
- 2. Assumed 15 units/ac or approximately 75 new townhomes
- 3. Subject to further geo-tech research

Comps in the area indicate a range of values of \$75-\$90/sf: \$17M - \$20M

PORTOLA:

- Is this site surplus to the District educational needs?
- If recommendation is to surplus the site, what are the follow up recommendations?
 - Use the property to create a new source of income to the WCCUSD
 - Work with the City of El Cerrito to rezone the property to maximize value and potential revenue to WCCUSD
- Other recommendations? Naylor Act considerations

SEAVIEW Unincorporated Contra Costa County







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SEAVIEW

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SEAVIEW



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ZONING CURRENT	
H-I& R-6	

ZONING PROPOSED H-1& R-6

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5- No trailer, garage, or other outbuilding shall34 used as a temporary or permanent residence nor shall any residential structure be moved to any lot from any other location. When the erection of any structure is begun, the work thereon must be prosecuted diligently and said structure must be completed within a reasonable time.

SEAVIEW OPINION OF VALUE

- I. Low Density Single Family Homes on approximately 4.6 acres of the site
- 2. Assumed density to match the original Parcel Map showing approximately 21 new homes
- 3. No assumed value at this time for the property south of Garrity Creek

Comps in the area indicate a range of values of \$15-\$18/sf: \$3M - \$3.6M

SEAVIEW:

- Is this site surplus to the District educational needs?
- If recommendation is to surplus the site, what are the follow up recommendations?
 - Use the property to create a new source of income to the WCCUSD
 - Work with Contra Costa Board of Supervisors to rezone the property to maximize value and potential revenue to WCCUSD
 - Working with East Bay Regional Park District to incorporate a portion of this site as a segment of their trail system?
 - Work with Contra Costa County on potential Park and Recreation uses for parcel 2?
- Other recommendations? Naylor Act considerations