

**Office of  
The City Attorney  
City of San Diego**

**MEMORANDUM**

**DATE:** April 16, 2012

**TO:** Javier Mainar, Fire Chief, San Diego Fire-Rescue Department

**FROM:** City Attorney

**SUBJECT:** Proposition 26 Review of Proposed Fire-Rescue Department User Fees for FY 2013

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**INTRODUCTION**

Under Council Policy 100-05, general fund departments are required to conduct comprehensive user fee studies every three years. These fee studies ensure City departments identify and recover all reasonable and allowable costs incurred in providing government services.

Financial Management staff has asked participating departments to obtain an opinion on the legality of their proposed user fee adjustments and additions from the Office of the City Attorney in light of Proposition 26. Approved by the voters in 2010, Proposition 26 amends articles XIII A and XIII C of the California Constitution to provide that a levy, charge, or exaction of any kind imposed, increased, or extended by a local government is a tax unless an exception applies. Exceptions to Proposition 26 include user fees; government service or product fees; regulatory fees; government property entrance fees; fines and penalties imposed by a court or local government; property development impact fees; and assessments and property-related fees governed by Proposition 218.<sup>1</sup>

Each Proposition 26 exception involves its own legal standard for determining the amount of a legally permissible fee. Under article XIII C, section 1(e)(1)(2)(3) of the California Constitution, which discusses some of the exceptions to Proposition 26, no fee may exceed the reasonable cost of providing the service. However, such fees should reimburse the government entity for all reasonable direct and indirect expenses incurred. *United Business Commission v. City of San Diego*, 91 Cal. App. 3d 156, 166 (1979). As noted in *United Business Commission*, “... the municipality need only apply sound judgment and consider ‘probabilities according to the best honest viewpoint of informed officials’ in determining the amount of the fee.” *Id.* This Office has advised City staff to explain the link between the cost and the service provided and justify all fee calculations based on a study of the costs associated with the fee for Council’s consideration

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<sup>1</sup> For a fuller discussion of Proposition 26, see City Att'y MOL No. 11-3 (Mar. 4, 2011), “Proposition 26 and Its Impact on City Fees and Charges.”

and approval. Therefore, depending on the particular type of fee and individual department activities, staff for each City department developed their proposed user fee adjustments using the comprehensive Citywide method developed by Financial Management and Comptroller staff.<sup>2</sup>

We have reviewed a detailed summary of the Fire-Rescue Department's cost recovery calculations as described in Exhibit A and proposed fee adjustments as described in Exhibit B. Our Proposition 26 analysis of each fee is discussed below.

## **ANALYSIS**

### **I. PUBLIC ASSEMBLY PERMIT FEE**

A public assembly permit allows for gatherings of fifty or more people in an area not normally used for public assembly. The Fire-Rescue Department is allowed to issue a public assembly permit pursuant to the California Fire Code (CFC).<sup>3</sup> The Fire-Rescue Department is allowed to recover the costs associated with issuing the permits pursuant to chapter one of the California Fire Code.<sup>4</sup>

A fee for a permit is a fee for a specific government benefit or privilege. Under Proposition 26, such fees are exempted from the stringent voter approval requirements imposed by that law provided these fees do not exceed the reasonable costs to the City of conferring the benefit or privilege.<sup>5</sup> Since a public assembly permit grants only the holder the privilege of staging an event which would otherwise be prohibited by law and the holder is only charged the permitting costs, we believe that the public assembly permitting fee is defensible as an exception to Proposition 26.

### **II. FIREWORKS/PYROTECHNICS PERMIT FEE**

A fireworks/pyrotechnics permit is issued by the Fire-Rescue Department after a plan check and site inspection for activities associated with pyrotechnics or fireworks. The Fire-Rescue Department is allowed to issue a fireworks/pyrotechnics permit pursuant to the California Fire Code.<sup>6</sup> The Fire-Rescue Department is allowed to recover the costs associated with issuing the permits pursuant to chapter one of the California Fire Code.<sup>7</sup>

A fee for a permit is a fee for a specific government benefit or privilege. Under Proposition 26, such fees are exempted from the stringent voter approval requirements imposed by that law provided these fees do not exceed the reasonable costs to the City of conferring the benefit or

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<sup>2</sup> The method was approved by Financial Management and the Comptroller and provided to the departments by Financial Management. The number (budget item) used to apportion rates (overhead and load) against direct cost is the responsibility of each department based on the contents and knowledge of their individual department activities. This Office did not independently verify or recalculate the numbers provided or the validity of the methodology.

<sup>3</sup> CFC § 105.6.34.

<sup>4</sup> CFC § 113.

<sup>5</sup> Cal. Const. art. XIII and XIIIIC, § 1(e)(1).

<sup>6</sup> CFC § 105.6.14.

<sup>7</sup> CFC § 113.

privilege.<sup>8</sup> Since a fireworks/ pyrotechnics permit allows only the permit holder to utilize fireworks or pyrotechnic effects that would otherwise be prohibited by law and since the fee is based on the City's permitting cost, we believe that the fireworks/pyrotechnics permitting fee is defensible as an exception to Proposition 26.

### **III. TRADE SHOW PERMIT FEE**

A permit is required for trade shows after the Fire-Rescue Department conducts a site inspection and conducts a plan check. The Fire-Rescue Department is allowed to issue a trade show permit pursuant to the California Fire Code.<sup>9</sup> The Fire-Rescue Department is allowed to recover the costs associated with issuing the permits pursuant to chapter one of the California Fire Code.<sup>10</sup>

A fee for a permit is a fee for a specific government benefit or privilege. Under Proposition 26, such fees are exempted from the stringent voter approval requirements imposed by that law provided these fees do not exceed the reasonable costs to the City of conferring the benefit or privilege.<sup>11</sup> A trade show permit only grants the permit holder the privilege of holding an event and the permit is based on the City's permitting cost. Therefore, we believe that the trade show permitting fee is defensible as an exception to Proposition 26.

### **IV. TENT/CANOPY PERMIT FEE**

The Fire-Rescue Department will issue a permit after a plan check and inspection of any tents or canopies. The Fire-Rescue Department is allowed to issue a tent/canopy permit pursuant to the California Fire Code.<sup>12</sup> The Fire-Rescue Department is allowed to recover the costs associated with issuing the permits pursuant to chapter one of the California Fire Code.<sup>13</sup>

A fee for a permit is a fee for a specific government benefit or privilege. Under Proposition 26, such fees are exempted from the stringent voter approval requirements imposed by that law provided these fees do not exceed the reasonable costs to the City of conferring the benefit or privilege.<sup>14</sup> Since the tent/canopy permit allows only the holder the benefit of raising a tent/canopy for an event and since the fee is based on the City's costs of permitting, we believe that the tent/canopy permitting fee is defensible as an exception to Proposition 26.

### **V. STANDBY SERVICES FEE**

During certain special events or public assemblies, the Fire-Rescue Department may require the presence of one or more Fire-Rescue Department standby personnel. The Fire-Rescue Department is allowed to offer standby services for fire prevention personnel pursuant to the

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<sup>8</sup> Cal. Const. art. XIII and XIIIC, § 1(e)(1).

<sup>9</sup> CFC § 105.6.13.

<sup>10</sup> CFC § 113.

<sup>11</sup> Cal. Const. art. XIII and XIIIC, § 1(e)(1).

<sup>12</sup> CFC § 105.6.43.

<sup>13</sup> CFC § 113.

<sup>14</sup> Cal. Const. article XIII and XIIIC, § 1(e)(1).

San Diego Municipal Code.<sup>15</sup> The Fire-Rescue Department is allowed to recover the costs associated with standby services pursuant to the California Constitution and state law.<sup>16</sup>

A fee for standby services is a fee for a specific government good or service. Under Proposition 26, such fees are exempted from the stringent voter approval requirements imposed by that law provided the fee does not exceed the reasonable cost to the City of providing the service or product.<sup>17</sup> Since the standby services fee is only charged to those who request these services and based on the City's cost of providing the service, we believe that the standby services fee is defensible as an exception to Proposition 26.

## **VI. FIRE COMPANY INSPECTION PROGRAM FEE**

The Fire-Rescue Department conducts inspections of structures and buildings within the City of San Diego to ensure compliance with the Fire Code and other safety-related regulations. The Fire-Rescue Department is allowed to conduct the fire company inspection program pursuant to the California Fire Code.<sup>18</sup> The Fire-Rescue Department is allowed to recover the costs associated with conducting these inspections pursuant to chapter one of the California Fire Code.<sup>19</sup>

A fee for a regulatory inspection is a fee for costs of regulating an activity. Under Proposition 26, such fees are exempted from the stringent voter approval requirements imposed by that law provided the charge is related to the reasonable regulatory costs of the activity.<sup>20</sup> The fire company inspection program fee is only charged to those who need inspections and is based on the reasonable costs of regulation. Therefore, we believe that the fire company inspection program fee is defensible as an exception to Proposition 26.

## **VII. PRE-INSPECTION FEE**

The owners and operators of care facilities are required by law to arrange a pre-inspection of their buildings in order to begin business. The Fire-Rescue Department is allowed to conduct pre-inspections pursuant to the California Fire Code.<sup>21</sup> The Fire-Rescue Department is allowed to recover the costs associated with conducting these inspections pursuant to chapter one of the California Fire Code.<sup>22</sup>

A fee for a regulatory inspection is a fee for costs of regulating an activity. Under Proposition 26, such fees are exempted from the stringent voter approval requirements imposed by that law provided the charge is related to the reasonable regulatory costs of the activity.<sup>23</sup> Since the pre-

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<sup>15</sup> San Diego Municipal Code § 55.0403(a).

<sup>16</sup> CFC § 113.

<sup>17</sup> Cal. Const. art. XIII and XIIIC, § 1(e)(2).

<sup>18</sup> See CFC chapter 1.

<sup>19</sup> CFC § 113.

<sup>20</sup> Cal. Const. art. XIII and XIIIC, § 1(e)(3).

<sup>21</sup> See CFC chapter 1.

<sup>22</sup> CFC § 113.

<sup>23</sup> Cal. Const. art. XIII and XIIIC, § 1(e)(3).

inspection fee is only charged to those who require this inspection and the fee is based on the reasonable cost of regulating this activity, we believe that the pre-inspection fee is defensible as an exception to Proposition 26.

### **VIII. SPECIAL SURVEY INSPECTION FEE**

The owners of buildings and structures may request to meet with a Fire-Rescue Department inspector in order to review fire-related building requirements. The Fire-Rescue Department is allowed to conduct special survey inspections pursuant to the California Fire Code.<sup>24</sup> The Fire-Rescue Department is allowed to recover the costs associated with conducting these inspections pursuant to chapter one of the California Fire Code.<sup>25</sup>

A fee for a regulatory inspection is a fee for costs of regulating an activity. Under Proposition 26, such fees are exempted from the stringent voter approval requirements imposed by that law provided the charge is related to the reasonable regulatory costs of the activity.<sup>26</sup> This fee is only charged to those requesting the special survey inspection and the fee is based on the reasonable costs of regulation. Therefore, we believe that the special survey inspection fee is defensible as an exception to Proposition 26.

### **IX. FIRE LANE INSPECTION FEE**

Fire-Rescue Department engine companies conduct inspections of fire lanes every two years. The Fire-Rescue Department is allowed to conduct fire lane inspections pursuant to the California Fire Code.<sup>27</sup> The Fire-Rescue Department is allowed to recover the costs associated with conducting these inspections pursuant to chapter one of the California Fire Code.<sup>28</sup>

A fee for a regulatory inspection is a fee for costs of regulating an activity. Under Proposition 26, such fees are exempted from the stringent voter approval requirements imposed by that law provided the charge is related to the reasonable regulatory costs of the activity.<sup>29</sup> Since the fee is only charged to those requiring an inspection and the fee is based on the reasonable costs of conducting the inspection, we believe that the fire lane inspection fee is defensible as an exception to Proposition 26.

### **X. TECHNICAL SERVICES/HAZMAT PERMITS AND INSPECTIONS FEE**

The Fire-Rescue Department also conducts inspections and issues permits related to the installation, removal, or repair of hazardous materials systems or containers. The Fire-Rescue Department is allowed to issue technical services/HAZMAT permits and conduct technical

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<sup>24</sup> See CFC chapter 1.

<sup>25</sup> CFC § 113.

<sup>26</sup> Cal. Const. art. XIII and XIIIC, § 1(e)(3).

<sup>27</sup> See CFC chapter 1.

<sup>28</sup> CFC § 113.

<sup>29</sup> Cal. Const. art. XIII and XIIIC, § 1(e)(3).

services/HAZMAT inspections pursuant to the California Fire Code.<sup>30</sup> The Fire-Rescue Department is allowed to recover the costs associated with issuing these permits and conducting these inspections pursuant to chapter one of the California Fire Code.<sup>31</sup>

A fee for a permit is a fee for a specific government benefit or privilege, and a fee for a regulatory inspection is a fee for costs of regulating an activity. Under Proposition 26, such fees are exempted from the stringent voter approval requirements imposed by that law provided the regulatory charge is related to the reasonable regulatory costs of the activity and the permit fee does not exceed the reasonable costs to the City of conferring the benefit or privilege.<sup>32</sup> Since the technical services/HAZMAT permit gives only the permit holder the ability to handle these materials and because the fee is based on the City's costs of permitting this activity, we believe that the technical services/HAZMAT permit fee is defensible as an exception to Proposition 26. We also believe the technical services/HAZMAT inspections fee is an exception to Proposition 26 because it is only charged to those requiring the inspection and is based on the reasonable costs of regulating the activity.

## XI. CEDMAT PERMITS AND INSPECTIONS FEE

Businesses that store or utilize combustible, explosive, or dangerous materials must have Fire-Rescue Department issued permits and subject themselves to site inspections. The Fire-Rescue Department is allowed to issue CEDMAT permits and conduct CEDMAT inspections pursuant to the San Diego Municipal Code.<sup>33</sup> The Fire-Rescue Department is allowed to recover the costs associated with issuing these permits and conducting these inspections pursuant to the San Diego Municipal Code.<sup>34</sup>

A fee for a permit is a fee for a specific government benefit or privilege, and a fee for a regulatory inspection is a fee for costs of regulating an activity. Under Proposition 26, such fees are exempted from the stringent voter approval requirements imposed by that law provided the regulatory charge is related to the reasonable regulatory costs of the activity and the permit fee does not exceed the reasonable costs to the City of conferring the benefit or privilege.<sup>35</sup> Since the CEDMAT permit fees are only charged to those requiring a permit and the fee is based on the reasonable cost of providing that benefit, we believe that the CEDMAT permit fee is defensible as an exception to Proposition 26. We also believe the CEDMAT inspections fee is an exception to Proposition 26 because it is only charged to those requiring the inspection and is based on the reasonable costs of regulating the activity.

## XII. EXPLOSIVE PERMITS AND INSPECTIONS FEE

Any time explosives are used in the City, the Fire-Rescue Department must conduct a site inspection and issue a permit to the user. The Fire-Rescue Department is allowed to issue

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<sup>30</sup> See CFC chapter 1.

<sup>31</sup> CFC § 113.

<sup>32</sup> Cal. Const. art. XIII and XIIIC, §§ 1(e)(1), (e)(3).

<sup>33</sup> SDMC § 55.2701.

<sup>34</sup> SDMC § 55.2701(e).

<sup>35</sup> Cal. Const. art. XIII and XIIIC, §§ 1(e)(1), (e)(3).

explosive permits and conduct explosive inspections pursuant to the California Fire Code.<sup>36</sup> The Fire-Rescue Department is allowed to recover the costs associated with issuing these permits and conducting these inspections pursuant to chapter one of the California Fire Code.<sup>37</sup>

A fee for a permit is a fee for a specific government benefit or privilege, and a fee for a regulatory inspection is a fee for costs of regulating an activity. Under Proposition 26, such fees are exempted from the stringent voter approval requirements imposed by that law provided the regulatory charge is related to the reasonable regulatory costs of the activity and the permit fee does not exceed the reasonable costs to the City of conferring the benefit or privilege.<sup>38</sup> Since the explosive permit fees are only charged to those requiring a permit and the fee is based on the reasonable cost of providing that benefit, we believe that the explosives permit fee is defensible as an exception to Proposition 26. We also believe the explosives inspections fee is an exception to Proposition 26 because it is only charged to those requiring the inspection and is based on the reasonable costs of regulating the activity.

### XIII. KEY BOX INSTALLATION INSPECTION FEE

Gated buildings or structures may install a key box (colloquially known as a “knox box”) to allow emergency responders quick access into a gated area. The Fire-Rescue Department is allowed to conduct key box installation inspections pursuant to the California Fire Code.<sup>39</sup> The Fire-Rescue Department may recover the costs associated with conducting these inspections pursuant to chapter one of the California Fire Code.<sup>40</sup>

A fee for a regulatory inspection is a fee for costs of regulating an activity. Under Proposition 26, such fees are exempted from the stringent voter approval requirements imposed by that law provided the charge is related to the reasonable regulatory costs of the activity.<sup>41</sup> Since the key box installation inspection fee is charged only to those requiring this inspection and the fee is based on the reasonable costs of regulating this activity, we believe that the key box installation inspection fee is defensible as an exception to Proposition 26.

### XIV. VESSEL TOWING/IMPOUNDING FEE

Impounded vessels are towed to a secure dock after being impounded. Ship owners may also request a tow from the Fire-Rescue Department during normal operating hours. The Fire-Rescue Department is allowed to impound and tow vessels pursuant to the San Diego Municipal Code.<sup>42</sup> The Fire-Rescue Department may recover the costs associated with impounding and towing these vessels pursuant to the San Diego Municipal Code.<sup>43</sup>

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<sup>36</sup> See CFC chapter 1.

<sup>37</sup> CFC § 113.

<sup>38</sup> Cal. Const. art. XIII and XIIIC, §§ 1(e)(1), (e)(3).

<sup>39</sup> See CFC chapter 1.

<sup>40</sup> CFC § 113.

<sup>41</sup> Cal. Const. art. XIII and XIIIC, § 1(e)(3).

<sup>42</sup> SDMC § 63.25.3(d).

<sup>43</sup> *Id.*

A fee for towing or impounding a vessel is a fee for a specific government good or service. Under Proposition 26, such fees are exempted from the stringent voter approval requirements imposed by that law provided the fee does not exceed the reasonable cost to the City of providing the service or product.<sup>44</sup> Because the vessel towing/impounding fee is only charged to the owners of the vessel and the fee is based on the City's costs to impound or tow, we believe that the vessel towing and impound fee is defensible as an exception to Proposition 26.

#### **XV. VESSEL STORAGE FEE**

Vessels impounded by the Fire-Rescue Department must be stored. The Fire-Rescue Department is allowed to store vessels pursuant to the San Diego Municipal Code.<sup>45</sup> The Fire-Rescue Department is allowed to recover the costs associated with storing these vessels pursuant to the San Diego Municipal Code.<sup>46</sup>

A fee for storing a vessel is a fee for a specific government good or service. Under Proposition 26, such fees are exempted from the stringent voter approval requirements imposed by that law provided the fee does not exceed the reasonable cost to the City of providing the service or product.<sup>47</sup> Since only the owner of the vessel is charged the vessel storage fee and the fee is based on the cost to store, we believe that the vessel storage fee is defensible as an exception to Proposition 26.

#### **XVI. VESSEL PUMPING AND SALVAGE FEE**

If a vessel is sinking or damaged, the Fire-Rescue Department may perform vessel pumping or salvage services during emergency operations. The Fire-Rescue Department is allowed to pump and salvage vessels pursuant to the San Diego Municipal Code.<sup>48</sup> The Fire-Rescue Department is allowed to recover the costs associated with pumping and salvaging these vessels pursuant to the San Diego Municipal Code.<sup>49</sup>

A fee for pumping and salvaging a vessel is a fee for a specific government good or service. Under Proposition 26, such fees are exempted from the stringent voter approval requirements imposed by that law provided the fee does not exceed the reasonable cost to the City of providing the service or product.<sup>50</sup> Since the vessel pumping and salvage fee is only charged to those utilizing the service and the fee is based on the costs of pumping and salvage, we believe that the vessel pumping and salvage fee is defensible as an exception to Proposition 26.

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<sup>44</sup> Cal. Const. art. XIII and XIIIC, § 1(e)(2).

<sup>45</sup> SDMC § 63.20.22(c).

<sup>46</sup> SDMC § 63.20.22(c).

<sup>47</sup> Cal. Const. art. XIII and XIIIC, § 1(e)(2).

<sup>48</sup> See SDMC § 22.1502 for the powers currently exercised by the SDFD Fire Chief regarding lifeguard operations.

<sup>49</sup> See SDMC § 22.1502.

<sup>50</sup> Cal. Const. art. XIII and XIIIC, § 1(e)(2).

## XVII. FOAMING OF BOAT BILGES FEE

If there is a fire hazard present on a vessel, the Fire-Rescue Department may, upon request, utilize a fire boat to foam the vessel's bilges. The Fire-Rescue Department is allowed to foam boat bilges pursuant to the San Diego Municipal Code.<sup>51</sup> The Fire-Rescue Department is allowed to recover the costs associated with foaming the boat bilges pursuant to the San Diego Municipal Code.<sup>52</sup>

A fee for foaming a boat bilge is a fee for a specific government good or service. Under Proposition 26, such fees are exempted from the stringent voter approval requirements imposed by that law provided the fee does not exceed the reasonable cost to the City of providing the service or product.<sup>53</sup> Since the foaming fee is only charged to those who request their bilges be foamed and the fee is based on the City's cost in providing this service, we believe that the foaming of boat bilges fee is defensible as an exception to Proposition 26.

## XVIII. STANDBY LIFEGUARD SERVICES FEE

During certain special events or public assemblies, the Fire-Rescue Department may require the presence of one or more Fire-Rescue Department standby personnel. The Fire-Rescue Department is allowed to offer standby lifeguard services for safety purposes pursuant to the San Diego Municipal Code.<sup>54</sup> The Fire-Rescue Department is allowed to recover the costs associated with standby lifeguard services pursuant to the California Constitution and state law.<sup>55</sup>

A fee for standby lifeguard services is a fee for a specific government good or service. Under Proposition 26, such fees are exempted from the stringent voter approval requirements imposed by that law provided the fee does not exceed the reasonable cost to the City of providing the service or product.<sup>56</sup> This fee is only charged to those requiring such standby services and the fee is based on the costs of providing this service. Therefore, we believe that the standby lifeguard fee is defensible as an exception to Proposition 26.

## XIX. LIFEGUARD EVENT PERMIT FEE

The Fire-Rescue Department will issue a permit for water events that require lifeguard services. The Fire-Rescue Department is allowed to issue a lifeguard event permit pursuant to the San Diego Municipal Code.<sup>57</sup> The Fire-Rescue Department is allowed to recover the costs associated with issuing the permits pursuant to the San Diego Municipal Code.<sup>58</sup>

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<sup>51</sup> See SDMC § 22.1502 for the powers currently exercised by the SDFD Fire Chief regarding lifeguard operations.

<sup>52</sup> See SDMC § 22.1502.

<sup>53</sup> Cal. Const. art. XIII and XIIIC, § 1(e)(2).

<sup>54</sup> See SDMC § 22.1502 for the powers currently exercised by the SDFD Fire Chief regarding lifeguard operations.

<sup>55</sup> See SDMC § 22.1502

<sup>56</sup> Cal. Const. art. XIII and XIIIC, § 1(e)(2).

<sup>57</sup> SDMC § 63.0103.

<sup>58</sup> SDMC § 63.03.

Javier Mainar, Fire Chief

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A fee for a permit is a fee for a specific government benefit or privilege. Under Proposition 26, such fees are exempted from the stringent voter approval requirements imposed by that law provided these fees do not exceed the reasonable costs to the City of conferring the benefit or privilege.<sup>59</sup> Since the lifeguard event permit allows only the holder the benefit of holding a water event requiring lifeguard supervision and since the fee is based on the City's costs of permitting, we believe that the lifeguard event permit fee is defensible as an exception to Proposition 26.

## **XX. FEES NOT BEING MODIFIED**

Proposition 26 does not apply to fees that are not being modified as long as the authority for the fee has not expired or been rescinded. The fee schedule currently in use by the Fire-Rescue Department was approved by the City Council on May 12, 2009, by San Diego Resolution R-304861, effective July 1, 2009. The authorization of these fees did not include an expiration date, and these fees remain in place until withdrawn.

## **CONCLUSION**

We conclude that the fees listed in the User Fee Summary are likely exempt from the definition of "tax" contained in Proposition 26 based on the information provided.

JAN I. GOLDSMITH, City Attorney

By

Noah J. Brazier  
Deputy City Attorney

NJB:jdf:ccm:amt

Attachments: Exhibits A and B

cc: Mark Leonard, Director, Financial Management

MS-2012-10

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<sup>59</sup> Cal. Const. art. XIII and XIIIIC, § 1(e)(1).

**Exhibit A**

**Fiscal Year 2013 Proposed User Fee Adjustments**

**Cost Recovery Calculations**

## User Fee Departmental Cost Recovery Calculations

Department: Fire-Rescue      Dept No: 1912      Fee Title: Special Events Permits, Inspections and Sta Load Rate: 23.0%  
 Preparer/Contact: Dianne Mod Date: 12-16-11      Fee Legal Authority: Overhead Rate: 34.5%

**Fee Description:** Includes inspection services for public assembly permits, fireworks/pyrotechnic permits, trade show permits, tent/canopy permits and standby services at places of public assembly and special events.

PE Costs	A	B	C	D	E	F	G	INDIRECT COSTS		TOTAL COSTS (DIRECT COSTS + LABOR LOAD + OVERHEAD + FRINGE LOAD)	J
								LABOR COST (HOURLY RATE X HOURS)	ESTIMATED HOURLY FRINGE	FRINGE COST (EST. HOURLY FRINGE x HOURS)	
JOB CLASS and CLASS CODE				(A x B)	(D x E)	(C + E)	(C x load rate (%)			(C + G) x OH (%)	(E x load rate (%)
(.10) Assistant Fire Marshall 1156	\$ 59.44	208.00	\$ 12,363.52	\$ 36.77	\$ 7,648.16	\$ 20,011.68	\$ 2,843.61	\$ 5,246.46	\$ 1,759.08	\$ 29,880.83	
(.5) Fire Prevention Supervisor 1476	\$ 51.01	1,040.00	\$ 53,050.40	\$ 34.20	\$ 35,568.00	\$ 88,618.40	\$ 12,201.59	\$ 22,511.94	\$ 8,180.64	\$ 131,512.57	
(2.50) Fire Prevention Inspector II	\$ 44.21	5,200.00	\$ 229,892.00	\$ 34.14	\$ 177,528.00	\$ 407,420.00	\$ 52,875.16	\$ 97,554.67	\$ 40,831.44	\$ 598,681.27	
(.75) Clerical Assistant II 1535	\$ 17.34	1,560.00	\$ 27,050.40	\$ 14.98	\$ 23,368.80	\$ 50,419.20	\$ 6,221.59	\$ 11,478.84	\$ 5,374.82	\$ 73,494.45	
	8,008.00	\$ 322,356.32	\$ 120.09	\$ 244,112.96	\$ 566,469.28	\$ 74,141.95	\$ 136,791.90	\$ 56,145.98			

Total Inspectable Hours (1,500 x 2.50 Fire Prevention Inspector II)  
 Fee \$ 3,750  
 Total Program Cost \$ 833,519.12  
 Fee \$ 222.28

**Revenue code is:** 416045, 416046, 416047, 416048, 416056, 4222235  
**Notes:** Assistant Fire Marshall Hourly Salary = \$48.13 (Hourly Salary) + \$7.22 (15% Admin Speciality Pay) + \$4.09 (8.5% EMT Pay) = \$59.44. Assistant Fire Marshall, Fire Prevention Supervisor and Fire Prevention Inspector II hourly salary rate includes 15% Administrative Pay and 8.5% EMT special pay.

#### User Fee Departmental Cost Recovery Calculations

**Department:** Fire-Rescue      **Dept No:** 1912      **Fee Title:** Fire Company Inspection Program (FCIP)      **Load Rate:** 23.0%  
**Preparer/Contact:** Dianne Mod Date: 12-16-11      **Fee Legal Authority:** 34.5%  
**Overhead Rate:**

**Fee Description:** Inspections conducted by fire station personnel of City of San Diego structures to ensure compliance with Fire and Life Safety Codes.

PE Costs	A	B	C	D	E	F	G	H	I	J	
JOB CLASS and CLASS CODE	DIRECT COSTS					INDIRECT COSTS					<b>TOTAL COSTS (DIRECT COSTS + LABOR LOAD + OVERHEAD + FRINGE LOAD)</b>
	LABOR HOURS PER SERVICE OCCURRENCE	LABOR COST (HOURLY RATE x HOURS)	ESTIMATED HOURLY FRINGE	FRINGE COST (EST.HOURLY FRINGE x HOURS)	DIRECT COSTS (LABOR COST + FRINGE)	LABOR LOAD (LABOR COST x LOAD RATE)	DEPT/CITY OVERHEAD (LABOR LOAD x DEPT/CITY OVERHEAD)	FRINGE LOAD (FRINGE x LOAD RATE)	DEPT/CITY OVERHEAD (LABOR LOAD x DEPT/CITY OVERHEAD)	INDIRECT COSTS (C x load rate (F + G + H + I))	
(.20) Assistant Fire Marshall 1156	\$ 59.44	\$ 416.00	\$ 24,727.04	\$ 36.77	\$ 15,296.32	\$ 40,023.36	\$ 5,687.22	\$ 10,492.92	\$ 3,518.15	\$ 59,721.65	
(1.00) Fire Supervisor Prevention Supervisor 1476	\$ 51.01	\$ 2,080.00	\$ 106,100.80	\$ 34.20	\$ 71,136.00	\$ 177,236.80	\$ 24,403.18	\$ 45,023.87	\$ 16,361.28	\$ 263,025.14	
(6.00) Fire Prevention Inspector II	\$ 44.21	\$ 12,480.00	\$ 551,740.80	\$ 34.14	\$ 426,067.20	\$ 977,808.00	\$ 126,900.38	\$ 234,131.21	\$ 97,995.46	\$ 1,436,835.05	
1475 (.50) Clerical Assistant II 1535	\$ 17.34	\$ 1,040.00	\$ 18,033.60	\$ 14.98	\$ 15,579.20	\$ 33,612.80	\$ 4,147.73	\$ 7,652.56	\$ 3,583.22	\$ 48,986.30	
16,016.00 \$ 700,602.24 \$ 120.09 \$ 528,078.72 \$ 1,228,680.96 \$ 161,138.52 \$ 297,300.56 \$ 121,458.11  Total Inspectable Hours (1,500 hrs x 6 Fire Prevention Inspector II) \$ 1,808,578.14 Fee - Labor Component (Total Program Cost/Total Inspectable Hours) \$ 9,000 Equipment Charge \$ 200.95 Total Fee \$ 34.56  <b>Revenue code is:</b> 422061 <b>Notes:</b> Assistant Fire Marshall, Fire Prevention Supervisor and Fire Prevention Inspector II hourly salary rate includes 15% Administrative special pay and 8.5% EMT special pay.											





### User Fee Departmental Cost Recovery Calculations

Department: Fire-Rescue    Dept No: 19112    Fee Title: CEDMAT  
 Preparer/Contact: Dianne Mod Date:

Fee Legal Authority:

Load Rate:  
 23.0%  
 Overhead Rate:  
 34.5%

**Fee Description:** Site inspections of all businesses to include biotechs that store or utilize combustible, explosive or other dangerous materials to ensure compliance with Fire and Life Safety Codes.

PE Costs	A	B	C	D	E	F	G	H	I	J	
LABOR COST (HOURLY RATE X HOURS)		ESTIMATED HOURLY RATE X FRINGE		FRINGE COST (EST. HOURLY FRINGE X HOURS)		LABOR LOAD (LABOR COST X LOAD RATE)		DEPT/CITY OVERHEAD (LABOR LOAD X DEPT/CITY OVERHEAD)		TOTAL COSTS (DIRECT COSTS + LABOR LOAD + OVERHEAD + FRINGE LOAD)	
JOB CLASS and CLASS CODE	(A x B)	(A x B)	(D x E)	(C + E)	(C x %)	(C x load rate (C + G) x OH (C x %))	(C x load rate (C + G) x OH (C x %))	(F x load rate (F + G + H + I) (F x %))	(F x load rate (F + G + H + I) (F x %))	(F x load rate (F + G + H + I) (F x %))	(F x load rate (F + G + H + I) (F x %))
(.20) Assistant Fire Marshall 1156	\$ 59.44	\$ 416.00	\$ 24,727.04	\$ 36.77	\$ 15,296.32	\$ 40,023.36	\$ 5,687.22	\$ 10,492.92	\$ 3,518.15	\$ 59,721.65	
(.5) Fire Prevention Supervisor 1476	\$ 51.01	\$ 1,040.00	\$ 53,050.40	\$ 34.20	\$ 35,568.00	\$ 88,618.40	\$ 12,201.59	\$ 22,511.94	\$ 8,180.64	\$ 131,512.57	
(3.00) Fire Prevention Inspector II	\$ 44.21	\$ 6,240.00	\$ 275,870.40	\$ 34.14	\$ 213,033.60	\$ 488,904.00	\$ 63,450.19	\$ 117,065.60	\$ 48,997.73	\$ 718,417.52	
(.50) Word Processing Operator 1746	\$ 18.23	\$ 1,040.00	\$ 18,959.20	\$ 15.42	\$ 16,036.80	\$ 34,996.00	\$ 4,360.62	\$ 8,045.34	\$ 3,688.46	\$ 51,090.42	
<b>Total Inspectable Hours (1.500 x 3.00 Fire Prevention Inspector II)</b>											
<b>Total Program Cost</b>											
<b>Fee</b>											
<b>\$ 960,742.16</b>											
<b>4,500</b>											
<b>213.50</b>											

Revenue code is: 422236, 422292

**Notes:** Assistant Fire Marshall Hourly Salary = \$48.13 (Hourly Salary) + \$7.22 (15% Admin Speciality Pay) + \$4.09 (8.5% EMT Pay) = \$59.44.

Total Inspectable Hours (1.500 x 3.00 Fire Prevention Inspector II)	
Fee	\$ 213.50





**User Fee Departmental Cost Recovery Calculations**

**Department:** Fire-Rescue      **Dept No:** 1912      **Fee Title:** Fire Prevention and Foaming  
**Preparer/Contact:** Max Affarano      **Date:** 12-12-11      **Fee Legal Authority:**

**Load Rate:**  
23.0%  
Overhead Rate:  
34.5%

**Fee Description:** This function is performed in response to a potential fire/ explosion hazard on board a vessel. A Fire Boat with 3 crew is used for this operation.

PE Costs	A	B	C	D	E	F	G	H	I	J
JOB CLASS and CLASS CODE	HOURLY SALARY RATE	LABOR HOURS PER SERVICE OCCURRENCE	LABOR COST (HOURLY RATE x HOURS)	ESTIMATED HOURLY FRINGE	FRINGE COST (EST HOURLY FRINGE x HOURS)	DIRECT COSTS (LABOR COST + FRINGE)	LABOR LOAD (LABOR COST x LABOR LOAD)	DEPT/CITY OVERHEAD (LABOR LOAD x DEPT/CITY OVERHEAD)	FRINGE LOAD (FRINGE x LABOR LOAD)	TOTAL COSTS (DIRECT COSTS + LABOR LOAD + OVERHEAD + FRINGE LOAD)
20000604 - LG Sgt	\$ 37.42	1.00	\$ 37.42	\$ 25.31	\$ 25.31	\$ 62.73	\$ 8.61	\$ 15.88	\$ 5.82	\$ 93.04
20000619 - LGII	\$ 34.19	1.00	\$ 34.19	\$ 23.98	\$ 23.98	\$ 58.17	\$ 7.86	\$ 14.51	\$ 5.52	\$ 86.06
20000606 - LGII	\$ 31.03	1.00	\$ 31.03	\$ 22.63	\$ 22.63	\$ 53.66	\$ 7.14	\$ 13.17	\$ 5.20	\$ 79.17
20000927 - Sr. Clerk/Typist	\$ 20.92	0.50	\$ 10.46	\$ 16.77	\$ 8.39	\$ 18.85	\$ 2.41	\$ 4.44	\$ 1.93	\$ 27.62
NPE - Fire Boat	\$ 71.23	1.00	\$ 71.23	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total cost (fee) calculation is referenced in the Notes section below.										
										\$ 357.12

Revenue code is: 422129

**Notes:** All lifeguard uniformed positions include 8.5% EMT pay - A Fire Boat crew consists of 1 LGII, 1 LGIII and 1 LG Sgt.- 30 minutes administrative work are also added to this fee

### User Fee Departmental Cost Recovery Calculations

**Department:** Fire-Rescue      **Dept No:** 1912      **Fee Title:** Lifeguard Safety - Fire Boat  
**Preparer/Contact:** Max Affarano      **Date:** 12-12-11      **Fee Legal Authority:**

**Load Rate:** 23.0%  
**Overhead Rate:** 34.5%

**Fee Description:** Often times the Lifeguard Division is asked to provide Lifeguard presence for safety purposes during sport events, movie shootings etc. - In these circumstances Lifeguards are assigned to go on availability. This allows to "mix and match" resources as needed and appropriately charge for full cost recovery.

PE Costs	A	B	C	D	E	F	G	H	I	J
JOB CLASS and CLASS CODE	HOURLY SALARY RATE	LABOR HOURS PER SERVICE OCCURRENCE	LABOR COST (HOURLY RATE x HOURS)	ESTIMATED HOURLY FRINGE	FRINGE COST (EST HOURLY FRINGE x HOURS)	DIRECT COSTS (LABOR COST + FRINGE)	LABOR LOAD (LABOR COST x LABOR LOAD)	DEPT/CITY OVERHEAD (LABOR LOAD x DEPT/CITY OVERHEAD)	FRINGE LOAD (FRINGE x LABOR LOAD)	TOTAL COSTS (DIRECT COSTS + LABOR LOAD + OVERHEAD + FRINGE LOAD)
NPE - Fire Boat	\$ 71.23	1.00	\$ 71.23	\$ -	\$ 71.23	\$ -	\$ -	\$ -	\$ -	\$ 71.23
Total cost (fee) calculation is referenced in the Notes section below										

Revenue code is: 422129

**Notes:** A Lifeguard Fire Boat might be needed to complement the presence of Lifeguards during special events on beaches.

### User Fee Departmental Cost Recovery Calculations

Department: Fire-Rescue  
 Preparer/Contact: Max Affarano  
**Dept No:** 1912    **Fee Title:** Lifeguard Safety - LG I EMT  
**Date:** 12-12-11    **Fee Legal Authority:**

**Load Rate:** 23.0%  
**Overhead Rate:** 34.5%

**Fee Description:** Often times the Lifeguard Division is asked to provide Lifeguard presence for safety purposes during sport events, movie shootings etc. - In these circumstances Lifeguards are assigned to go on availability. This allows to "mix and match" resources as needed and appropriately charge for full cost recovery.

PE Costs	A		B		C		D		E		F		G		H		I		J		
			DIRECT COSTS										INDIRECT COSTS								
JOB CLASS and CLASS CODE	HOURLY SALARY RATE	LABOR HOURS PER SERVICE OCCURRENCE		LABOR COST (HOURLY RATE x HOURS)		ESTIMATED HOURLY FRINGE		FRINGE COST (EST HOURLY FRINGE x HOURS)		DIRECT COSTS (LABOR COST + FRINGE)		LABOR LOAD (LABOR x COST x LABOR LOAD)		DEPT/CITY OVERHEAD (LABOR LOAD x DEPT/CITY OVERHEAD)		FRINGE LOAD (FRINGE x LABOR LOAD)		DEPT/CITY OVERHEAD + LABOR LOAD + OVERHEAD + FRINGE LOAD		TOTAL COSTS (DIRECT COSTS + LABOR LOAD + OVERHEAD + FRINGE LOAD)	
		(A x B)		(D x B)		(C + E)		(C x labor load %)		(C + G) x OH %)		(E x labor load %)		(F + G + H + I)		(E x labor load %)		(F + G + H + I)			
200000603 - LGI EMT	\$ 21.16	\$ 1.00	\$ 21.16	\$ 17.05	\$ 1.78	\$ -	\$ -	\$ 22.94	\$ 4.87	\$ -	\$ -	\$ 8.98	\$ 0.41	\$ 37.20	\$ -	\$ -	\$ -	\$ -	\$ 37.20		
<b>Total cost (fee) calculation is referenced in the Notes section below:</b>																					
<b>Revenue code is: 422129</b>																					

**Notes:** LGI will require regular time rates

User Fee Departmental Cost Recovery Calculations

Department: Fire-Rescue      Dept No: 1912      Fee Title: Lifeguard Safety - LG II  
 Preparer/Contact: Max Afranaro      Date: 12-12-11      Fee Legal Authority:  
 Load Rate: 23.0%  
 Overhead Rate: 34.5%

Fee Description: Often times the Lifeguard Division is asked to provide Lifeguard presence for safety purposes during sport events, movie shootings etc. - In these circumstances Lifeguards are assigned to go on availability. This allows to "mix and match" resources as needed and appropriately charge for full cost recovery.

IPE Costs	A	B	C	D	E	F	G	H	I	J
Job Title	Labor Hours per service Occurrence	Salary	EMT add on	Fringe	Total	Hourly Salary	Hourly Labor Load	Hourly Fringe Load	Hourly Rate	Hourly Rate
Lifeguard II	1	\$9,268	\$0.06*	\$7,081	111,625	\$11,625	31.03	7.14	73.81	13.17
<b>TOTAL FEE:</b>							22.63		66.01	5.21

Revenue code is: 42129

Notes: LG II will require OT rates

IPE Costs	A	B	C	D	E	F	G	H	I	J
Job Title	Labor Hours per service Occurrence	Salary	EMT add on	Fringe	Total	Hourly Salary	Hourly Labor Load	Hourly Fringe Load	Hourly Rate	Hourly Rate
Lifeguard II	1	\$9,268	\$0.06*	\$7,081	111,625	\$11,625	31.03	7.14	73.81	13.17
<b>TOTAL FEE:</b>							22.63		66.01	5.21

Revenue code is: 42129

Notes: LG II will require OT rates

User Fee Departmental Cost Recovery Calculations

Department: Fire-Rescue      Dept No: 1912      Fee Title: Lifeguard Safety - LG III

Preparer/Contact: Max Afranro      Date: 12-12-11      Fee Legal Authority:

Fee Description: Often times the Lifeguard Division is asked to provide lifeguard presence for safety purposes during sport events, movie shootings etc. - In these circumstances Lifeguards are assigned to go on availability. This allows to "mix and match" resources as needed and appropriately charge for full cost recovery.

PE Costs	A	B	C	D	E	F	G	H	I	J
Job Title	Labor Hours per service Occurrence	Salary	EMT	add on	Fringe	Total	Hourly Salary	Hourly Labor Load	Hourly Fringe Load	Hourly Rate (labor+load)
Lifeguard III	1	66.541	5.571		49,861	120,393	34.19	7.66	23.93	532
<b>TOTAL FEE</b>										

Notes: LGIII will require OT rate

User Fee Departmental Cost Recovery Calculations
Load Rate: 23.0%
Overhead Rate: 34.5%
OT Fringe Rate: 0.74
OT Fringe Load Rate: 0.77
OT Hourly Salary: 51.28
OT Hourly Rate: 51.79
OT Overhead: 17.9
OT Fringe Recovery: 34.5%
OT Fringe Load Recovery: 34.5%
OT Fringe Load Rate: 55.75

User Fee Departmental Cost Recovery Calculations

Department: Fire-Rescue      Dept No: 1912      Fee Title: Lifeguard Safety - LG Sgt  
 Preparer/Contact: Max Afranano      Date: 12-12-11      Load Rate: 23.0%  
 Fee Legal Authority:      Overhead Rate: 34.5%

Fee Description: Often times the Lifeguard Division is asked to provide Lifeguard presence for safety purposes during sport events, movie shootings etc. - In these circumstances Lifeguards are assigned to go on availability. This allows to "mix and match" resources as needed and appropriately charge for full cost recovery.

PE Costs										
Job Title	Labor Hours per service Occurrence	Salary	EMT add on	Fringe	Total	Hourly Salary	Hourly Labor Load	Hourly Fringe Load	Hourly Fringe Rate (cal/mRate d)	Cost Recovery Hourly Rate
Lifeguard Sergeant	1	71,739	8,098	\$2,640	130,477	37.42	8.61	24.31	5.82	15.38
<b>TOTAL FEE:</b>										
Revenue code is: 422129										

Notes: LG Sgt. Will require OT Rates

User Fee Departmental Cost Recovery Calculations										
Job Title	Labor Hours per service Occurrence	Salary	EMT add on	Fringe	Total	Hourly Salary	Hourly Labor Load	Hourly Fringe Load	Hourly Fringe Rate (cal/mRate d)	Cost Recovery Hourly Rate
Lifeguard Sergeant	1	71,739	8,098	\$2,640	130,477	37.42	8.61	24.31	5.82	15.38
<b>TOTAL FEE:</b>										
Revenue code is: 422129										

User Fee Departmental Cost Recovery Calculations										
Job Title	Labor Hours per service Occurrence	Salary	EMT add on	Fringe	Total	Hourly Salary	Hourly Labor Load	Hourly Fringe Load	Hourly Fringe Rate (cal/mRate d)	Cost Recovery Hourly Rate
Lifeguard Sergeant	1	71,739	8,098	\$2,640	130,477	37.42	8.61	24.31	5.82	15.38
<b>TOTAL FEE:</b>										
Revenue code is: 422129										

### User Fee Departmental Cost Recovery Calculations

**Department:** Fire-Rescue  
**Preparer/Contact:** Max Affarano  
**Dept No:** 1912    **Fee Title:** Lifeguard Safety - PickUp Truck  
**Date:** 12-12-11    **Fee Legal Authority:**

Load Rate:  
23.0%

Overhead Rate:  
34.5%

**Fee Description:** Often times the Lifeguard Division is asked to provide Lifeguard presence for safety purposes during sport events, movie shootings etc. - In these circumstances Lifeguards are assigned to go on availability. This allows to "mix and match" resources as needed and appropriately charge for full cost recovery.

PE Costs	A	B	C	D	E	F	G	H	I	J	
										DIRECT COSTS	
JOB CLASS and CLASS CODE	HOURLY SALARY RATE	LABOR HOURS PER SERVICE OCCURRENCE	LABOR COST (HOURLY RATE x HOURS)	ESTIMATED HOURLY FRINGE	FRINGE COST (EST. HOURLY FRINGE x HOURS)	DIRECT COSTS (LABOR COST + FRINGE)	DEPT/CITY OVERHEAD (LABOR LOAD x DEPT/CITY OVERHEAD)	FRINGE LOAD (FRINGE x LABOR LOAD)	DEPT/CITY OVERHEAD (LABOR COST x LABOR LOAD)	(F + G) x OH ((C + G) x OH / (C x labor load %))	(F + G + H + I) (E x labor load %)
NPE - LG Pick up Truck	\$ 6.64	1.00	\$ 6.64	\$ -	\$ 6.64	\$ -	\$ 6.64	\$ -	\$ -	\$ 6.64	\$ 6.64
Total cost (fee) calculation is referenced in the Notes section below.											

Revenue code is: 422129

**Notes:** A Lifeguard Pick up truck might be needed to complement the presence of Lifeguards during special events on beaches.

### User Fee Departmental Cost Recovery Calculations

**Department:** Fire-Rescue      **Dept No:** 1912      **Fee Title:** Lifeguard Safety - PWC  
**Preparer/Contact:** Max Affarano      **Date:** 12-12-11      **Fee Legal Authority:**

**Load Rate:** 23.0%  
**Overhead Rate:** 34.5%

**Fee Description:** Often times the Lifeguard Division is asked to provide Lifeguard presence for safety purposes during sport events, movie shootings etc. - In these circumstances Lifeguards are assigned to go on availability. This allows to "mix and match" resources as needed and appropriately charge for full cost recovery.

PE Costs	A	B	DIRECT COSTS			E	F	G	H	I	J
			LABOR COST (HOURLY RATE x HOURS)	LABOR HOURS PER SERVICE OCCURRENCE	ESTIMATED HOURLY FRINGE						
JOB CLASS and CLASS CODE			(A x B)		(D x B)	(C + E)	(C x labor load %)	((C + G) x OH %)	(E x labor load %)	(F + G + H + I)	
NPE - PWC	\$ 10.40	1.00	\$ 10.40	\$ -	\$ -	\$ 10.40	\$ -	\$ -	\$ -	\$ 10.40	
Total cost (fee) calculation is referenced in the Notes section below											

Revenue code is: 422129

**Notes:** A Lifeguard PWC might be needed to complement the presence of Lifeguards during special events on beaches.

### User Fee Departmental Cost Recovery Calculations

**Department:** Fire-Rescue      **Fee Title:** Lifeguard Safety Administration fee  
**Preparer/Contact:** Max Affarano      **Date:** 12-12-11      **Fee Legal Authority:**

**Load Rate:** 23.0%  
**Overhead Rate:** 34.5%

**Fee Description:** Often times the Lifeguard Division is asked to provide Lifeguard presence for safety purposes during sport events, movie shootings etc. - In these circumstances Lifeguards are assigned to go on availability. This allows to "mix and match" resources as needed and appropriately charge for full cost recovery.

PE Costs	A	B	C	DIRECT COSTS			G	INDIRECT COSTS	H	I	J
				LABOR COST (HOURLY RATE X HOURS)	ESTIMATED ESTIMATED HOURLY FRINGE	FRINGE COST (EST. HOURLY FRINGE X HOURS)		DIRECT COSTS (LABOR COST + FRINGE)	LABOR LOAD (LABOR COST X LABOR LOAD)	DEPT/CITY OVERHEAD (LABOR LOAD X DEPT/CITY OVERHEAD)	FRINGE LOAD (FRINGE X LABOR LOAD)
JOB CLASS and CLASS CODE				(A x B)	(D x E)	(C + E)	(C x labor load %)	((C + G) x OH load %)	(E x labor load %)	(F + G + H + I)	
2000009327 - Sr. Clerk/Typist	\$ 20.92	1.00	\$ 20.92	\$ 16.77	\$ 16.77	\$ 37.69	\$ 4.81	\$ 8.88	\$ 3.86	\$ 55.24	
Total cost (fee) calculation is referenced in the Notes section below				\$ -	\$ -		\$ -	\$ -	\$ -	\$ -	\$ 55.24

Revenue code is: 422129

Notes:

### User Fee Departmental Cost Recovery Calculations

**Department:** Fire-Rescue  
**Preparer/Contact:** Max Affarano  
**Dept No:** 1912    **Fee Title:** Lifeguard Safety - Surf Boat  
**Date:** 12-12-11    **Fee Legal Authority:**

23.0%  
34.5%

**Fee Description:** Often times the Lifeguard Division is asked to provide Lifeguard presence for safety purposes during sport events, movie shootings etc. - In these circumstances Lifeguards are assigned to go on availability. This allows to "mix and match" resources as needed and appropriately charge for full cost recovery.

PE Costs	A	B	C	D	E	F	G	H	I	J	INDIRECT COSTS		TOTAL COSTS (DIRECT COSTS + LABOR LOAD + OVERHEAD + FRINGE LOAD)				
											LABOR COST (HOURLY RATE x HOURS)	ESTIMATED HOURLY FRINGE	FRINGE COST (EST HOURS x FRINGE x HOURS)	DIRECT COSTS (LABOR COST + FRINGE)	LABOR LOAD (LABOR COST x LOAD)	DEPT/CITY OVERHEAD (LABOR COST + LABOR LOAD x DEPT/CITY OVERHEAD)	FRINGE LOAD (FRINGE x LABOR LOAD)
JOB CLASS and CLASS CODE											(D x B)	(A x B)	(D x E)	(C x labor load %)	((C + G) x OH load %)	(E x labor load %)	(F + G + H + I)
NPE- Surf Boat	\$ 41.88	1.00	\$ 41.88	\$ -	\$ -	\$ 41.88	\$ -	\$ -	\$ -	\$ -						\$ 41.88	
Total cost (fee) calculation is referenced in the Notes section below																\$ 41.88	

Revenue code is: 422129

**Notes:** A Lifeguard Surf Boat might be needed to complement the presence of Lifeguards during special events on beaches.

### User Fee Departmental Cost Recovery Calculations

**Department:** Fire-Rescue  
**Preparer/Contact:** Max Affarano  
**Dept No:** 1912    **Fee Title:** Lifeguard Safety - SUV  
**Date:** 12-12-11    **Fee Legal Authority:**

**Load Rate:** 23.0%  
**Overshead Rate:** 34.5%

**Fee Description:** Often times the Lifeguard Division is asked to provide Lifeguard presence for safety purposes during sport events, movie shootings etc. - In these circumstances Lifeguards are assigned to go on availability. This allows to "mix and match" resources as needed and appropriately charge for full cost recovery.

PE Costs	A	B	C	D	E	F	G	H	I	J	INDIRECT COSTS	
											LABOR LOAD (LABOR COST x LABOR LOAD)	DEPT/CITY OVERHEAD (LABOR COST + LABOR LOAD) x DEPT/CITY OVERHEAD
JOB CLASS and CLASS CODE												
NPE - LG sup truck (SUV)	\$ 6.23	1.00	\$ 6.23	\$ -	\$ -	\$ 6.23	\$ -	\$ -	\$ -	\$ 6.23		
Total cost (fee) calculation is referenced in the Notes section below												

Revenue code is: 422129

Notes: A Lifeguard SUV might be needed to complement the presence of Lifeguards during special events on beaches.

**User Fee Departmental Cost Recovery Calculations**

Department: Fire-Rescue  
 Preparer/Contact: Max Affarano

Dept No: 1912      Fee Title: Pumping and Salvage  
 Date: 12-12-11      Fee Legal Authority:

Load Rate:  
 Overhead Rate:

23.0%  
 34.5%

**Fee Description:** These emergency operations are performed in response to a sinking vessel. Historically it takes at least two hours to perform these functions.

JOB CLASS and CLASS CODE	HOURLY SALARY RATE	LABOR HOURS PER SERVICE OCCURRENCE	DIRECT COSTS		FRINGE COST (EST HOURLY FRINGE x HOURS)	DIRECT COSTS (LABOR COST + FRINGE)	INDIRECT COSTS		TOTAL COSTS (DIRECT COSTS + LABOR LOAD + OVERHEAD + FRINGE LOAD)
			LABOR COST (HOURLY RATE x HOURS)	(A x B)			DEPT/CITY OVERHEAD (LABOR LOAD x DEPT/CITY OVERHEAD)	FRINGE LOAD (FRINGE x LABOR LOAD)	
			(A x B)	(D x B)			(C + E)	((C + G) x OH %)	
20000604 - LG Sgt	\$ 37.42	2.00 \$ 74.84	\$ 25.31	\$ 50.62	\$ 125.46	\$ 17.21	\$ 31.76	\$ 11.64	\$ 186.07
20000619 - LGIII	\$ 34.19	2.00 \$ 68.38	\$ 23.98	\$ 47.96	\$ 116.34	\$ 15.73	\$ 29.02	\$ 11.03	\$ 172.12
20000606 - LGII	\$ 31.03	2.00 \$ 62.06	\$ 22.63	\$ 45.26	\$ 107.32	\$ 14.27	\$ 26.34	\$ 10.41	\$ 158.34
20000927 - Sr. Clerk/Typist	\$ 20.92	0.50 \$ 10.46	\$ 16.77	\$ 8.39	\$ 18.85	\$ 2.41	\$ 4.44	\$ 1.93	\$ 27.62
NPE - Fire Boat	\$ 71.23	2.00 \$ 142.46	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 142.46
<i>Total cost (fee) calculation is referenced in the Notes section below.</i>		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
									\$ 686.67

Revenue code is: 422129

**Notes:** All lifeguard uniformed positions include 8.5% EMT pay - A Fire Boat crew consists of 1 LGII, 1 LGIII and 1 LG Sgt- 30 minutes administrative work are also added to this fee

### User Fee Departmental Cost Recovery Calculations

**Department:** Fire-Rescue      **Dept No:** 1912      **Fee Title:** Vessel Storage  
**Preparer/Contact:** Max Affarano      **Date:** 12-12-11      **Fee Legal Authority:**

**Load Rate:** 23.0%  
**Overhead Rate:** 34.5%

**Fee Description:** When vessels are abandoned or illegally moored, or in a condition that endangers waterway safety, they are impounded by Lifeguards and the owner is charged a daily fee for storage of the vessel.

PE Costs	A	B	C	D	E	F	G	H	I	J
	DIRECT COSTS				INDIRECT COSTS					
JOB CLASS and CLASS CODE	HOURLY SALARY RATE	LABOR HOURS PER SERVICE OCCURRENCE	LABOR COST (HOURLY RATE x HOURS)	ESTIMATED HOURLY FRINGE	FRINGE COST (EST HOURLY FRINGE x HOURS)	DIRECT COSTS (LABOR COST + FRINGE)	LABOR LOAD (LABOR COST x LABOR LOAD)	DEPT/CITY OVERHEAD (LABOR LOAD x DEPT/CITY OVERHEAD)	FRINGE LOAD (FRINGE x LABOR LOAD)	TOTAL COSTS (DIRECT COSTS + LABOR LOAD + OVERHEAD + FRINGE LOAD)
20000606 - LGII	\$ 31.03	0.75 \$ 23.27	\$ 22.63	\$ 16.97	\$ 40.24	\$ 5.35	\$ 9.87	\$ 3.90	\$ 59.37	
Total cost (fee) calculation is referenced in the Notes section below.										\$ 59.37

Revenue code is: 422129

**Notes:** All lifeguard uniformed positions include 8.5% EMT pay - LGI rate is taken from the above table (at regular time) 45 minute per 24 hours cycle is the estimated time needed to complete this task

### User Fee Departmental Cost Recovery Calculations

Department: Fire-Rescue      Dept No: 1912      Fee Title: Vessel Towing / Impound  
 Preparer/Contact: Max Affarano      Date: 12-12-11      Fee Legal Authority: Muni Code: SDMMC63.25.31(B)      Load Rate: 23.0%  
     Overhead Rate: 34.5%

**Fee Description:** This non-emergency operation involves the tow of a vessel to a nearby marina or dock. This operation is also necessary when impounding a vessel.

JOB CLASS and CLASS CODE	HOURLY SALARY RATE	(A x B)	DIRECT COSTS			(C + E)	(C x labor load %)	(C + G) x OH (%)	(E x labor load %)	(F + G + H + I)
			LABOR COST		FRINGE COST					
			ESTIMATED HOURLY RATE x HOURS	(EST HOURLY FRINGE x HOURS)	DIRECT COSTS (LABOR COST + FRINGE)					
20000604 - LG Sgt	\$ 37.42	1.00 \$ 37.42 \$ 25.31 \$ 62.73 \$ 8.61 \$ 15.88 \$ 5.82 \$ 93.04								
20000619 - LGII	\$ 34.19	1.00 \$ 34.19 \$ 23.98 \$ 58.17 \$ 7.86 \$ 14.51 \$ 5.52 \$ 86.06								
20000606 - LGII	\$ 31.03	1.00 \$ 31.03 \$ 22.63 \$ 53.66 \$ 7.14 \$ 13.17 \$ 5.20 \$ 79.17								
20000927 - Sr. Clerk/Typist	\$ 20.92	0.50 \$ 10.46 \$ 16.77 \$ 8.39 \$ 18.85 \$ 2.41 \$ 4.44 \$ 1.93 \$ 27.62								
NPE - Fire Boat	\$ 71.23	1.00 \$ 71.23 \$ - \$ - \$ - \$ - \$ - \$ - \$ - \$ -								
NPE- Surf Boat	\$ 41.88	1.00 \$ 41.88 \$ - \$ - \$ - \$ - \$ - \$ - \$ - \$ -								
Total cost (fee) calculation is referenced in the Notes section below	\$ -	\$ -								\$ 292.48

Revenue code is: 422129

**Notes:** All lifeguard uniformed positions include 8.5% EMT pay - Fire boat Crew= 1LGII, 1LGIII, 1 LG Sgt - Surf Boat crew = 2 LGII - Rates are added and averaged since there is no way to know which type of boat/crew will be available to respond to these types of calls

### User Fee Departmental Cost Recovery Calculations

**Department:** Fire-Rescue      **Dept No:** 1912      **Event Permit Processing Fee**  
**Prepare/Contact:** Max Affarano      **Date:** 12-12-11      **Fee Legal Authority:** (SDDMC) Chapter 6, Article 3      **Load Rate:** 23.0%  
**Overhead Rate:** 34.5%

**Fee Description:** This is a fee applied to processing a permit for an event that will be held in the ocean or the bay.

PE Costs	A	B	DIRECT COSTS			E	F	INDIRECT COSTS			J
			LABOR COST (HOURLY RATE X HOURS)	LABOR HOURS PER SERVICE OCCURRENCE	ESTIMATED HOURLY FRINGE			FRINGE COST (EST.HOURLY FRINGE X HOURS)	DIRECT COSTS (LABOR COST + FRINGE)	LABOR LOAD (LABOR X COST X LABOR LOAD)	
JOB CLASS and CLASS CODE			(A x B)	(A x B)	(D x B)	(C + E)	(D x B)	(C x labor load %)	((C + G) x OH (E x labor load %))	((C x labor load %) x overhead %)	(F + G + H + I)
20000927 - Sr. Clerk/Typist	\$ 20.92	2.00	\$ 41.84	\$ 16.77	\$ 33.54	\$ 75.38	\$ 9.62	\$ 17.75	\$ 7.71	\$ 110.47	
Total cost of fee calculation is referenced in the Notes section below.			\$ -	\$ -	\$ -		\$ -	\$ -	\$ -	\$ -	\$ 110.47

Revenue code is: 422129

Notes: Two hours is the average time of processing a permit

**Exhibit B**

**Fiscal Year 2013 Proposed User Fee Adjustments**

**Department Summary**

## FY 2013 User Fee Analysis - Proposed Fee Adjustments

Department	Fee Title	Unit of Measurement	Current Fee	Current Cost Recovery %	Proposed Fee	Proposed Cost Recovery %
<b>Fire-Rescue Department</b>						
Fire Services	<b>Special Event Permits, Inspections and Standby Services (Spec. Events)</b>	Per Event	\$ 91.00	82%	\$ 111.10	100%
	Spec. Events - Public Assembly Permits	Per Event	\$ 182.00	82%	\$ 222.25	100%
	Spec. Events - Fireworks/Pyrotechnics Permits	Per Event	\$ 182.00	82%	\$ 222.25	100%
	Spec. Events - Trade Show Permits	Per Event (401 - 2,000 sq. ft.)	\$ 91.00	4%	\$ 222.25	100%
	Spec. Events - Tent/Canopy Permits	Per Event (2,001 - 10,000 sq. ft.)	\$ 182.00	66%	\$ 277.85	100%
	Spec. Events - Tent/Canopy Permits	Per Event (Larger 10,000 sq. ft.)	\$ 364.00	109%	\$ 333.40	100%
	Spec. Events - Standby Services (2 hr minimum-Fire Inspector II)	Per Hour	\$ 95.00	86%	\$ 110.90	100%
	Spec. Events - Standby Services (2 hr minimum-Fire Inspector Supervisor)	Per Hour	\$ 95.00	74%	\$ 127.90	100%
	Spec. Events - Standby Services (2 hr minimum-Assistant Fire Marshal)	Per Hour	\$ 95.00	64%	\$ 149.05	100%
	Spec. Events - Standby Services (4 hr minimum - Fire Inspector II)	Per Hour	\$ 138.00	124%	\$ 110.90	100%
	Spec. Events - Standby Services (4 hr minimum - Fire Inspector Supervisor)	Per Hour	\$ 138.00	108%	\$ 127.90	100%
	Spec. Events - Standby Services (4 hr minimum - Assistant Fire Marshal)	Per Hour	\$ 138.00	93%	\$ 149.05	100%
	Spec. Events - Standby Services	Per Hour	\$ 138.00	93%	\$ 149.05	100%
<b>Special Event Permits, Inspections and Standby Services - Estimated Revenue Variation:</b> \$ (152,311)						
Fire Company Inspection Program (FCIP)	Per Inspection (0 - 5,000 sq. ft.)	\$ 200.00	85%	\$ 235.50	100%	
FCIP - Assembly	Per Inspection (0 - 10,000 sq. ft.)	\$ 223.00	76%	\$ 294.40	100%	
FCIP - Assembly	Per Inspection (10,001 - 12,000 sq. ft.)	\$ 234.00	66%	\$ 353.25	100%	
FCIP - Assembly	Per Inspection (12,001 - 50,000 sq. ft.)	\$ 242.00	59%	\$ 412.15	100%	
FCIP - Assembly	Per Inspection (Larger than 50,000 sq. ft.)	\$ 671.00	142%	\$ 471.00	100%	
FCIP - Business	Per Inspection (0 - 5,000 sq. ft.)	\$ 279.00	118%	\$ 235.50	100%	
FCIP - Business	Per Inspection (5,001 - 10,000 sq. ft.)	\$ 326.00	111%	\$ 294.40	100%	
FCIP - Business	Per Inspection (10,001 - 12,000 sq. ft.)	\$ 445.00	126%	\$ 353.25	100%	
FCIP - Business	Per Inspection (12,001 - 50,000 sq. ft.)	\$ 445.00	108%	\$ 412.15	100%	
FCIP - Business	Per Inspection (Larger than 50,000 sq. ft.)	\$ 445.00	94%	\$ 471.00	100%	
FCIP - Health Care	Per Inspection (0 - 5,000 sq. ft.)	\$ 111.00	47%	\$ 235.50	100%	
FCIP - Health Care	Per Inspection (5,001 - 10,000 sq. ft.)	\$ 130.00	44%	\$ 294.40	100%	
FCIP - Health Care	Per Inspection (10,001 - 12,000 sq. ft.)	\$ 317.00	90%	\$ 353.25	100%	
FCIP - Health Care	Per Inspection (12,001 - 50,000 sq. ft.)	\$ 317.00	77%	\$ 412.15	100%	
FCIP - Health Care	Per Inspection (Larger than 50,000 sq. ft.)	\$ 421.00	89%	\$ 471.00	100%	
FCIP - Education	Per Inspection (0 - 5,000 sq. ft.)	\$ 201.00	85%	\$ 235.50	100%	

## FY 2013 User Fee Analysis - Proposed Fee Adjustments

Department	Fee Title	Unit of Measurement	Current Fee	Recovery %	Proposed Fee	Proposed Cost Recovery %	
FCIP - Education	Per Inspection (5,001 - 10,000 sq. ft.)	\$ 216.00	73%	\$ 294.40	100%		
FCIP - Education	Per Inspection (10,001 - 12,000 sq. ft.)	\$ 272.00	77%	\$ 353.25	100%		
FCIP - Education	Per Inspection (12,001 - 50,000 sq. ft.)	\$ 272.00	66%	\$ 412.15	100%		
FCIP - Education	Per Inspection (Larger than 50,000 sq. ft.)	\$ 272.00	58%	\$ 471.00	100%		
FCIP - Residential	Per Inspection (0 - 5,000 sq. ft.)	\$ 217.00	92%	\$ 235.50	100%		
FCIP - Residential	Per Inspection (5,001 - 10,000 sq. ft.)	\$ 246.00	84%	\$ 294.40	100%		
FCIP - Residential	Per Inspection (10,001 - 12,000 sq. ft.)	\$ 470.00	133%	\$ 353.25	100%		
FCIP - Residential	Per Inspection (12,001 - 50,000 sq. ft.)	\$ 470.00	114%	\$ 412.15	100%		
FCIP - Residential	Per Inspection (Larger than 50,000 sq. ft.)	\$ 470.00	100%	\$ 471.00	100%		
FCIP - Residential Care/Group Facilities	Per Inspection (0 - 6,000 sq. ft.)	\$ 161.00	68%	\$ 235.50	100%		
FCIP - Residential Care/Group Facilities	Per Inspection (Larger than 6,000 sq. ft.)	\$ 212.00	72%	\$ 294.40	100%		
FCIP - Large Family Day Care Facilities	Per Facility Inspection	\$ 190.00	81%	\$ 235.50	100%		
<b>FCIP - Estimated Revenue Variation:</b>		\$ 459,411					
<b>Pre-Inspections (PI)</b>		Per Pre-Inspection	\$ 50.00	25%	\$ 200.95	100%	
PI - Pre-Inspections		Per Pre-Inspection	\$ 228.00	76%	\$ 301.40	100%	
<b>Pre-Inspection - Estimated Revenue Variation:</b>		\$ 25,590					
<b>Technical Services/HazMat Permits and Inspections (Tech. Serv./HazMat)</b>							
Tech. Serv./HazMat - Above Ground Tank	Per Permit	\$ 1,130.00	98%	\$ 1,152.35	100%		
Installation Permit (Up to 3 Tanks)	Per Permit	\$ 320.00	69%	\$ 460.90	100%		
Tech. Serv./HazMat - Above Ground Tank Removal Permit (Up to 3 Tanks)	Per Permit	\$ 723.00	63%	\$ 1,152.35	100%		
Tech. Serv./HazMat - Underground Tank Installation Permit (Up to 3 Tanks)	Per Permit	\$ 719.00	156%	\$ 460.90	100%		
Tech. Serv./HazMat - Underground Tank Removal Permit (Up to 3 Tanks)	Per Permit	\$ 970.00	105%	\$ 921.85	100%		
Tech. Serv./HazMat - Tank/Gas Re-Pipe Permit (Per Re-Pipe)	Per Permit	\$ 957.00	138%	\$ 691.40	100%		
Tech. Serv./HazMat - Liquefied Petroleum Gas Installation Permit (Up to 3 Systems)	Per Permit	\$ 1,538.00	133%	\$ 1,152.35	100%		
Tech. Serv./HazMat - Compressed Natural Gas Installation Permit (Per System)	Per Permit	\$ 1,538.00	133%	\$ 1,152.35	100%		
Tech. Serv./HazMat - Compressed Gas/Med Gas Installation Permit (Up to 3 Systems)	Per Permit	\$ 1,538.00	133%	\$ 1,152.35	100%		
Tech. Serv./HazMat - Cryogen Tank and System Installation Permit (Per System)	Per Permit	\$ 996.00	86%	\$ 1,152.35	100%		
Tech. Serv./HazMat - Pressurized Solvent System Permit (Per System)	Per Permit	\$ 555.00	80%	\$ 691.40	100%		

## FY 2013 User Fee Analysis - Proposed Fee Adjustments

Department	Fee Title	Unit of Measurement	Current Fee	Current Cost Recovery %	Proposed Fee	Proposed Cost Recovery %
	Tech. Serv./HazMat - Soil Remediation Permit (Per Site)	Per Permit	\$ 565.00	123%	\$ 460.90	100%
	Tech. Serv./HazMat - Mobile Re-Fueling Tanker/Site Permit (Per Tanker/Site)	Per Permit Per Hour	\$ 182.00 \$ 96.00	39% 87%	\$ 460.90 \$ 110.90	100% 100%
	Tech. Serv./HazMat - Overtime Inspections					
	Tech. Serv./HazMat - Hourly Rate for Additional Services	Per Hour	\$ 96.00	42%	\$ 230.45	100%
<b>Technical Services/HazMat Permits and Inspections - Estimated Revenue Variation:</b> \$ (15,787)						
<b>CEDMAT Permits</b>						
	CEDMAT - Permits	Per Permit	\$ 46.00	43%	\$ 106.75	100%
	CEDMAT - Inspections	Per Inspection	\$ 112.00	52%	\$ 213.50	100%
<b>CEDMAT Permits and Inspections - Estimated Revenue Variation:</b> \$ 20,770						
<b>Miscellaneous</b>						
	Explosive Permits and Inspections	Per Site/Event	\$ 465.00	81%	\$ 576.15	100%
	Knox Box Installation Inspections	Per Address	\$ 137.00	66%	\$ 207.00	100%
	Fire Lanes	Per Lane	\$ 148.00	63%	\$ 235.50	100%
<b>Miscellaneous Fees - Estimated Revenue Variation:</b> \$ 32,521						
<b>Fire Services</b>						
	Event Permit Processing Fee	Per Permit	\$ 110.00	100%	\$ 110.45	100%
	Fire Prevention, Foaming of Boat Bilges	Per Incident	\$ 435.00	122%	\$ 357.10	100%
	LG Safety Protection - Fire Boat (New Fee)	Per Hour	\$ -	n/a	\$ 71.20	100%
	LG Safety Protection - LG I EMT	Per Hour	\$ 41.00	110%	\$ 37.20	100%
	LG Safety Protection - LG II	Per Hour	\$ 41.00	53%	\$ 77.80	100%
	LG Safety Protection - LG III	Per Hour	\$ 41.00	48%	\$ 85.75	100%
	LG Safety Protection - LG SGT	Per Hour	\$ 41.00	44%	\$ 93.85	100%
	LG Safety Protection - Pick Up Truck (New Fee)	Per Hour	\$ -	n/a	\$ 6.60	99%
	LG Safety Protection - PWC (New Fee)	Per Hour	\$ -	n/a	\$ 10.40	100%
	LG Safety Protection - Sr Clerk (New Fee)	Per Hour	\$ -	n/a	\$ 55.20	100%
	LG Safety Protection - Surf Boat (New Fee)	Per Hour	\$ -	n/a	\$ 41.85	100%
	LG Safety Protection - SUV (New Fee)	Per Incident	\$ 569.00	83%	\$ 686.60	100%
	Vessel Pumping and Salvage	Per Day	\$ 50.00	84%	\$ 59.35	100%
	Vessel Storage	Per Hour	\$ 219.00	75%	\$ 292.45	100%
<b>Lifeguard Services - Estimated Revenue Variation:</b> \$ 3,763						
<b>Fire-Rescue Department - Estimated Revenue Variation of Proposed Fee Adjustments:</b> \$ 373,957						