FOR MEETING OF: NOVEMBER 18, 2020

CASE NO.: <u>CU20-08</u>

TO: HEARINGS OFFICER

FROM: LISA ANDERSON-OGILIVE, AICP, DEPUTY COMMUNITY

DEVELOPMENT DIRECTOR AND PLANNING ADMINISTRATOR

SUBJECT: CONDITIONAL USE PERMIT CASE NO. 20-08; 5775 COMMERCIAL

STREET SE; AMANDA NO. 20-113625-ZO

REQUEST

Summary: A proposal for the development of a new mixed-use building at an existing commercial development.

Request: A conditional use permit application to allow the development of a new mixed-use building, including approximately 15,000 square feet of commercial space and 71 apartment units, at an existing commercial development site. The subject property is zoned CR (Retail Commercial), within the South Gateway Overlay Zone, and located at 5775 Commercial Street SE (Marion County Assessor map and tax lot number(s): 083W14CD / 300, 400, 700, and 1000).

A vicinity map illustrating the location of the property is attached hereto, and made a part of this staff report (**Attachment A**).

APPLICANT: Bo Rushing

OWNERS: Rushing Commercial Crossing LLC (Bonita Rushing), Rushing

Wiltsey Crossing LLC (Bonita Rushing)

FILER: Brandie Dalton, Multi/Tech Engineering

RECOMMENDATION

Based upon the Facts and Findings contained in this staff report, staff recommends that the Hearings Officer APPROVE the request for a Conditional Use Permit for the development of a new mixed-use building at an existing commercial development, subject to the following conditions of approval:

Condition 1: The *multiple family* use shall contain no more than 71 dwelling units.

Condition 2: Open space of 3,408 square feet, or 48 square feet times the number of dwelling units proposed, shall be provided in the following form(s):

- a. Private balconies;
- b. Common open space within the building;
- c. Roof top garden; or
- d. Any combination of the above listed forms that equals 3,408 square feet, or 48 square feet times the number of dwelling units proposed.

- **Condition 3:** Windows shall be provided in all habitable rooms of the dwellings, other than bathrooms, on each wall that faces common open space, parking areas, and pedestrian paths.
- **Condition 4:** An offset of at least 4 feet in depth shall be provided along all exterior walls greater than 75 feet in length or width at 40-foot intervals, but shall not be required on the first floor.
- **Condition 5:** No off-street parking shall be located between the mixed-use building and Waln Creek.
- Condition 6: Weather protection in the form of awnings or canopies shall be provided along the ground floor building façade for a minimum of 75 percent of the length of the building façade for any wall which includes entrances for non-residential uses. Awnings or canopies shall have a minimum clearance height above the sidewalk or ground surface of 8 feet.

BACKGROUND

On August 19, 2020, a conditional use permit application was submitted for the development of a new mixed-use building and associated site improvements at an existing commercial development. The application was deemed complete for processing on October 27, 2020.

The public hearing before the City of Salem Hearings Officer is scheduled for November 18, 2020, at 5:30 p.m.—held remotely due to social distancing measures put in place to slow the spread of the COVID-19 virus. The agenda and hearing notice have information on how to access the meeting. Notice of public hearing was sent by mail to surrounding property owners and tenants pursuant to Salem Revised Code (SRC) requirements on October 29, 2020. Public hearing notice was also posted on the property pursuant to SRC requirements.

PROPOSAL

The subject development site is currently developed with three commercial buildings occupied by predominantly retail tenants. The applicant is requesting a conditional use permit to allow the future construction of a mixed-use building and associated site improvements in the southwest corner of the development site. The new mixed-use building would consist of approximately 15,000 square feet of commercial space and 71 apartment units. The applicant's preliminary site plan is included as **Attachment B**.

SUMMARY OF RECORD

The following items are submitted to the record and are available upon request: All materials submitted by the applicant, including any applicable professional studies such as traffic impact analysis, geologic assessments, and stormwater reports; any materials

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and comments from public agencies, City departments, neighborhood associations, and the public; and all documents referenced in this report.

APPLICANT'S STATEMENT

The applicant's statement addressing the applicable approval criteria for the conditional use permit is included as **Attachment C**.

FACTS AND FINDINGS

1. Salem Area Comprehensive Plan (SACP) designation

The Salem Area Comprehensive Plan (SACP) map designation for the subject property is "Commercial". The subject property is within the Urban Growth Boundary and the Urban Service Area.

2. Zoning and Surrounding Land Uses

The subject property is zoned CR (Retail Commercial). The proposal involves a mixed-use building which includes approximately 71 *multiple family* dwelling units. Pursuant to SRC 522.005, *multiple family* uses are allowed in the CR zone as a conditional use. The subject property is also within the South Gateway Overlay Zone. Pursuant to SRC 630.010, except as otherwise provided in this section, any use that is a permitted, special, conditional, or prohibited use in the underlying zone is a permitted, special, conditional, or prohibited use in the South Gateway Overlay Zone. The proposed mixed-use building does not include any of the additional prohibited uses set forth in this section under SRC Table 630-2.

The zoning and uses of surrounding properties include:

North: CG (General Commercial) – undeveloped property and *motor vehicle*

services

South: Across Wiltsey Road SE, RM-II (Multiple Family Residential) -

manufactured dwelling park, *multiple family* apartment complexes

East: Across Commercial Street SE, CR (Retail Commercial) and CG

(General Commercial) – Undeveloped property and *nursery stock*

wholesaler

West: Across Waln Creek, IC (Industrial Commercial) – self-service storage

3. Site Analysis

The subject property is part of an existing development site which is approximately 6.9 acres in size. The portion of the development site subject to the requested conditional use permit is currently vacant land, while the rest of the development site is developed as a retail shopping center.

The subject property abuts Commercial Street NE to the east and Wiltsey Road

SE to the south. Commercial Street SE is designated as a Major Arterial and Wiltsey Road SE is designated as a Collector within the Salem Transportation System Plan (TSP). The property abuts Waln Creek on the west and southwest.

4. Neighborhood and Citizen Comments

The subject property is located within the South Gateway Neighborhood Association. Notice was provided to the neighborhood association and surrounding property owners and tenants within 250 feet of the subject property. No comments were received from surrounding property owners, tenants, or the neighborhood association.

5. City Department and Public Agency Comments

The Fire Department has reviewed the proposal and provided the following comment: Items including fire department access and water supply will be required to be provided per the Oregon Fire Code.

The Building and Safety Division has reviewed the proposal and indicated they have no concerns.

The Public Works Department has reviewed the proposal and indicated that the proposal will be reviewed for conformance with their standards at the time of development / site plan review.

The Salem-Keizer School District (SKSD) has reviewed the proposal and provided a letter which is included as **Attachment E**. They indicated that the applicable elementary, middle, and high schools had sufficient school capacity to serve the proposed development. They noted that adequate pedestrian and bicycle infrastructure should be provided, and that a bus pullout should be included with the development if located more than one mile from any school. They also stated that the proposed development is eligible for school transportation for the elementary, middle, and high schools.

Staff Response: At time of development / site plan review, the adjacent transportation infrastructure will be reviewed for conformance with the TSP, including consideration of pedestrian and bicycle facilities. The subject property is located less than one mile from Battle Creek Elementary School, so no bus pullout should be required for the proposed conditional use permit.

6. Analysis of Conditional Use Criteria

SRC Chapter 240.005(a)(1) provides that:

No building, structure, or land shall be used or developed for any use which is designated as a conditional use in the UDC unless a conditional use permit has been granted pursuant to this Chapter.

SRC Chapter 240.005(d) establishes the following approval criteria for a conditional use permit:

Criterion 1:

The proposed use is allowed as a conditional use in the zone.

Staff Finding: SRC Chapter 522, Table 522-1 provides that *multiple family* uses are allowed in the CR zone as a conditional use.

Criterion 2:

The reasonably likely adverse impacts of the use on the immediate neighborhood can be minimized through the imposition of conditions.

Applicant's Statement: The complete written statement from the applicant addressing the conditional use approval criteria is included as **Attachment C**.

Staff Finding: The subject development site is currently developed with three commercial buildings occupied by predominantly retail tenants. The zoning of properties in the immediate area includes RM-II (Multiple Family Residential), IC (Industrial Commercial), CR (Retail Commercial), and CG (General Commercial). Uses in the area are a mix of residential, commercial, and industrial, including *multiple family, retail sales*, and *self-service storage*.

The zoning of the site allows the development of a 50-foot tall retail or office building with no limit on the square footage of the use. Allowing a residential use on the site, which generates fewer vehicle trips than most commercial uses, in a building that meets or exceeds the setback and parking requirements of the zone, will not have an adverse impact on the immediate neighborhood. At the time of development, impacts on traffic and the adjacent transportation infrastructure will be reviewed and required to be mitigated. To ensure the reasonably likely adverse impacts of the proposed *multiple family* use on the immediate neighborhood are minimized, Staff recommends the following condition of approval:

Condition 1: The *multiple family* use shall contain no more than 71 dwelling units.

Criterion 3:

The proposed use will be reasonably compatible with and have minimal impact on the livability or appropriate development of surrounding property.

Applicant's Statement: The complete written statement from the applicant addressing the conditional use approval criteria is included as **Attachment C**.

Staff Finding: The proposal is for a mixed-use building with both retail/office and multiple-family residential dwellings. The development site has three other buildings with a mix of predominantly retail uses.

The proposed mixed-use building is not subject to design review under the SRC. This is because the proposed *multiple family* use is within a mixed-use building (pursuant to SRC 702.005(b)(A)) and the building is not downtown or in an overlay zone which would require design review. However, the conditional use process allows for the consideration of livability and compatibility when determining if a use should be allowed, or if conditions should be placed on the approval in order to address livability and compatibility. Therefore, Staff reviewed the requirements for multi-family development and mixed-use buildings that are required in other zones and situations, and have proposed five conditions related to livability and compatibility. Specifically, we address open space and windows for the residential units, and building offsets, weather protection, and greater consideration of Waln Creek for the overall building design. These things are required for mixed use buildings either downtown or in the City's mixed-use overlay zones and for standalone multi-family developments. Additionally, because these things can be found in the adjacent multi-family and commercial developments, Staff finds that they should be provided to ensure livability and compatibility with the surrounding area.

The multiple-family residential goals for open space provides amenities that promote livability by having active and passive uses, encouraging preservation of natural open qualities, and ensuring open space is accessible and available to all residents. While residents will have access to the area's public parks and open spaces, providing adequate open space for the proposed development ensures that residents will be able to access recreational opportunities in or near their homes. This can help reduce impact on the surrounding area's public places and neighboring residents. The private open space standard for multiple family residential developments with 13 or more units is 48 square feet of open space for each dwelling unit located more than 5 feet above finished grade. Staff finds that requiring the same amount of open space within this development as would be required for private open space within a usual multi-family development is appropriate because this site is not located within downtown or a more urban area of town which has more open space facilities available to the public. The proposed condition allows flexibility in providing the required open space by allowing the applicant to choose one option or a combination of options that meet the minimum square footage. For example, the applicant may choose to provide balconies for half the units and a rooftop garden to meet the condition. Therefore, to ensure compatibility and livability with other properties in the area, the following condition of approval is recommended:

Condition 2: Open space of 3,408 square feet, or 48 square feet times the number of dwelling units proposed, shall be provided in the following form(s):

- a. Private balconies:
- b. Common open space within the building;
- c. Roof top garden; or
- d. Any combination of the above listed forms that equals 3,408 square feet, or 48 square feet times the number of dwelling units proposed.

The multiple family residential development design standards provide for crime prevention and resident safety measures, which are incorporated into the design of the development. Staff finds it appropriate to consider the same crime prevention techniques for this development. To incorporate crime prevention into site design, the multi-family design standards require windows be provided in all habitable rooms, other than bathrooms, on each wall that faces common open space, parking areas, and pedestrian paths to encourage visual surveillance of such areas and minimize the appearance of building bulk. By addressing crime prevention on the subject property, it will reduce the potential for crime in the area and ensure that the proposed *multiple family* use will have minimal impact on the livability of surrounding property. Staff recommends the following condition of approval:

Condition 3: Windows shall be provided in all habitable rooms of the dwellings, other than bathrooms, on each wall that faces common open space, parking areas, and pedestrian paths.

Offsets break up long, monotonous façades and provide a more visibly pleasing building. In the case of this property, we find that building offsets are needed to ensure compatibility with the surrounding residential uses. Many of the nearby multi-family developments are designed with building offsets; providing offsets on this development will ensure compatibility with existing residential development and any new multi-family residential development in the surrounding area. To meet the approval criterion, Staff recommends the following condition of approval:

Condition 4: An offset of at least 4 feet in depth shall be provided along all exterior walls greater than 75 feet in length or width at 40-foot intervals, but shall not be required on the first floor.

The design review standards set forth in SRC Chapter 702 encourage all newly constructed multiple family developments with 13 or more units to preserve natural open qualities that may exist on a site and to provide opportunities for active and passive recreation. If this development were to be subject to the design review standards of SRC Chapter 702, a minimum of 30 percent of the gross site area would be required to be designated and permanently reserved for open space. The subject property contains a segment of Waln Creek along the southwestern and western portions of the property. While the proposed development is not subject to the design review standards of SRC Chapter 702, Staff acknowledges, as outlined above, that the conditional use process allows for the consideration of livability and compatibility when determining if a use should be allowed, or if

conditions should be placed on the approval in order to address livability and compatibility. Staff believes the final site plan should be revised to remove or relocate the off-street parking between the proposed mixed-use building and Waln Creek. This would help to provide an amenity for the building's residents, and to ensure preservation of an existing natural open area. To preserve natural open qualities that exist on a site, to provide active and passive recreation, and to ensure the continued livability of the subject property and the surrounding properties, Staff recommends the following condition of approval:

Condition 5: No off-street parking shall be located between the mixed-use building and Waln Creek.

Unlike most mixed-use buildings developed in the city, the subject property is not located within a zone which requires design review for the proposed building. While Staff acknowledges that the subject property is not located in an area of the city which would necessitate or benefit from the usual mixed-use design standards in the same way that many of those buildings do, Staff notes that the proposed multiple family use is required to be reasonably compatible with surrounding property. The proposed building is part of an existing commercial development which incorporates some design features which are commonly required for mixed-use buildings around the city, including weather protection in the form of awnings or canopies along the ground floor of the building. Providing weather protection in the similar manner would ensure compatibility with the surrounding property. Staff recommends the following condition:

Condition 6: Weather protection in the form of awnings or canopies shall be provided along the ground floor building façade for a minimum of 75 percent of the length of the building façade for any wall which includes entrances for non-residential uses. Awnings or canopies shall have a minimum clearance height above the sidewalk or ground surface of 8 feet.

RECOMMENDATION

Based upon the Facts and Findings contained in this staff report, Staff recommends that the Hearings Officer APPROVE the request for a conditional use permit to allow the development of a new mixed-use building at an existing commercial development zoned CR (Retail Commercial), within the South Gateway Overlay Zone, and located at 5775 Commercial Street SE (Marion County Assessor map and tax lot number(s): 083W14CD / 300, 400, 700, and 1000) subject to the following conditions of approval:

Condition 1: The *multiple family* use shall contain no more than 71 dwelling units.

Condition 2: Open space of 3,408 square feet, or 48 square feet times the number of dwelling units proposed, shall be provided in the following form(s):

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- a. Private balconies;
- b. Common open space within the building;
- c. Roof top garden; or
- d. Any combination of the above listed forms that equals 3,408 square feet, or 48 square feet times the number of dwelling units proposed.
- **Condition 3:** Windows shall be provided in all habitable rooms of the dwellings, other than bathrooms, on each wall that faces common open space, parking areas, and pedestrian paths.
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Prepared by Brandon Pike, Planner I

Application Deemed Complete Date: October 27, 2020
State Mandated Decision Date: February 24, 2021

Attachments: A. Vicinity Map

B. Preliminary Site Plan

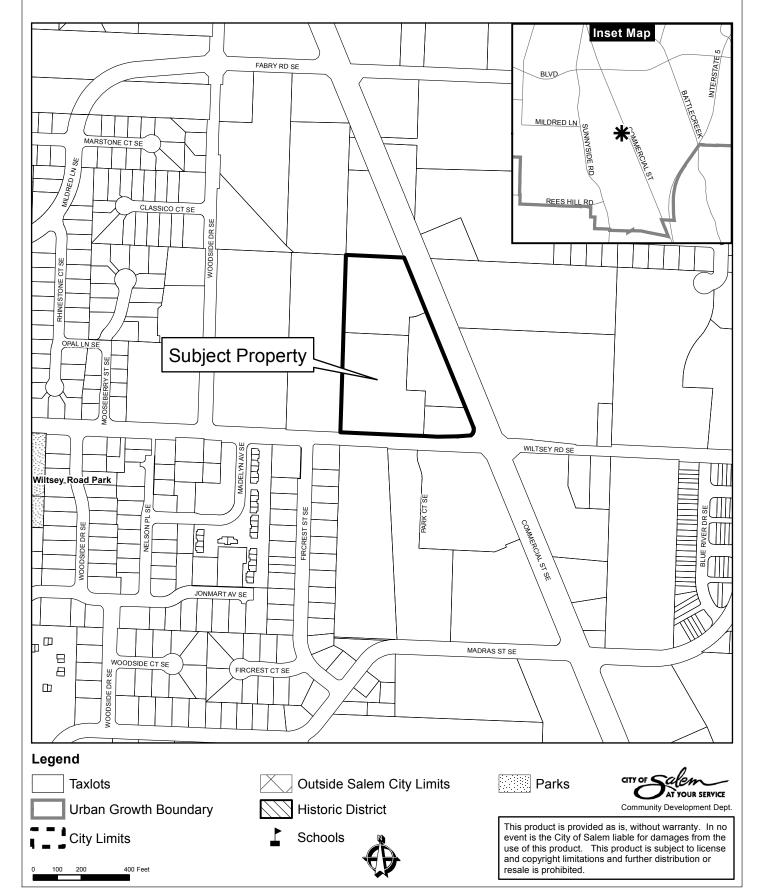
C. Applicant's Written Statement

D. Letter from Salem-Keizer School District Dated Nov. 9, 2020

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ATTACHMENT A

Vicinity Map 5775 Commercial Street SE



Anthony Place-Apartments Conditional Use

July 30, 2020

SITE HISTORY:

In 2015, Conditional Use 15-10 was approved for the subject property. The Conditional Use Approval was for a 61,500 square foot building consisting of 16,500 square feet of commercial use and 52 multi-family units.

On April 11, 2019, a Pre-Application Conference (PRE-AP19-36) was held with the City staff to discuss the development of properties located at 5775 Commercial Street SE (083W14CD/Tax Lots 300, 400, 700, 1000).

On October 2, 2019, Subdivision-Adjustment Case No. 19-07 was approved for a 5 lot subdivision. The subject property is Lot 2 of SUB-ADJ19-07.

PROPOSAL:

Under SRC 522.005-Table 522-1, multiple family dwellings are allowed within the CR zone with a Conditional Use permit.

The subject property is Lot 2 of SUB-ADJ19-07 and is 2.93 acres in size, zoned CR and located at 5775 Commercial Street (083W14CD/Tax Lot 700).

The applicant is proposing a 83,000 square foot building consisting of about 15,000 square feet of commercial use and 71-apartment units as shown on the site plans. The proposal is for a mixed-use development with residential uses located on the top 3 stories and commercial uses located on the ground floor of the complex.

CONDITIONAL USE CRITIERIA:

SRC 240.005(d) - An application for a Conditional Use Permit shall be granted if all of the following criteria are met:

- (1) The proposed use is allowed as a conditional use in the zone;
- (2) The reasonably likely adverse impacts of the use on the immediate neighborhood can be minimized through the imposition of conditions; and
- (3) The proposed use will be reasonably compatible with and have minimal impact on the livability or appropriate development of surrounding property.

APPLICANT'S REASONS ADDRESSING CHAPTER 240.005(d):

(1) Under SRC 522.005-Table 522-1, multiple family dwellings are allowed within the CR zone with a Conditional Use permit.

(2) The proposed apartments will have little to no impact on the neighborhood. The subject property is located in an already existing commercial neighborhood. The property is bordered on the west by an existing storage facility, to the east by existing commercial uses (Taco Bell), and to the north by existing commercial uses (furniture store, convenient store, and other commercial uses). There are existing multi-family units located to the south of the property as well.

Therefore, the proposed development will be consistent with the surrounding uses. The proposed multi-family units will have access to the already existing commercial amenities. The proposal is for a 83,000 square foot building consisting of about 15,000 square feet of commercial use and 71-apartment units as shown on the site plans. There are 71-units proposed. The development with required design standards and large setbacks provided help to eliminate any impacts on the surrounding neighborhood.

(3) The surrounding land uses within the vicinity are zoned and used as follows.

North: CR (Commercial Retail); Existing Commercial Uses East: CR (Commercial Retail); Existing Commercial Uses

South: Across Wiltsey Street; RM2 (Multi-Family Residential); existing multi-

family dwellings

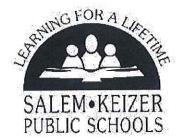
West: IC (Industrial Commercial); Existing storage facility

The apartments will be required to go through Site Plan/Design Review, which requires open space and landscaping at a higher percent than what a commercial use would be required to provide. Amenities like landscaped open space will help with the visual appeal of this area and reduce impacts on the neighborhood. The design standards are in place to help ensure compatibly with adjacent uses.

The proposed apartment development will provide pedestrian paths throughout the site and to Commercial Street and Wiltsey Road. The pedestrian paths will provide access and circulation to the surrounding commercial and residential neighborhoods.

Therefore, this criteria will be complied with through the Site Plan/Design Review process.

ATTACHMENT D



DAVID FRIDENMAKER, Manager Facility Rental, Planning, Property Services 3630 State Street, Bldg. C ● Salem, Oregon 97301-5316 503-399-3335 ● FAX: 503-375-7847

Christy Perry, Superintendent

November 9, 2020

Brandon Pike, Planner 1 Planning Division, City of Salem 555 Liberty Street SE, Room 305 Salem OR 97301

RE: Land Use Activity Case No. CU20-08, 5775 Commercial St. SE

The City of Salem issued a Request for Comments for a Land Use Case as referenced above. Please find below comments on the impact of the proposed land use change on the Salem-Keizer School District.

IDENTIFICATION OF SCHOOLS SERVING THE SUBJECT PROPERTY

The School District has established geographical school attendance areas for each school known as school boundaries. Students residing in any residence within that boundary are assigned to the school identified to serve that area. There are three school levels, elementary school serving kindergarten thru fifth grade, middle school serving sixth thru eighth grade, and high school serving ninth thru twelfth grade. The schools identified to serve the subject property are:

School Name	School Type	Grades Served	
Battle Creek	Elementary	K thru 5	
Judson	Middle	6 thru 8	
Sprague	High	9 thru 12	

Table 1

SCHOOL CAPACITY & CURRENT ENROLLMENT

The School District has established school capacities which are the number of students that a particular school is designed to serve. Capacities can change based on class size. School capacities are established by taking into account core infrastructure (gymnasium, cafeteria, library, etc.) counting the number of classrooms and multiplying by the number of students that each classroom will serve. A more detailed explanation of school capacity can be found in the School District's adopted Facility Plan.

School Name	School Type	School Enrollment	School Design Capacity	Enroll./Capacity Ratio
Battle Creek	Elementary	514	601	86%
Judson	Middle	905	1,059	85%
Sprague	High	1,767	1,940	91%

Table 2

POTENTIAL ADDITIONAL STUDENTS IN BOUNDARY AREA RESULTING FROM APPROVAL OF LAND USE CASE

The School District anticipates the number of students that may reside at the proposed development based on the housing type, single family (SF), duplex/triplex/four-plex (DU), multifamily (MF) and mobile home park (MHP). The School District commissioned a study by the Mid-Willamette Valley Council of Governments in 2014 to determine an estimate of students per residence, for the Salem-Keizer area, in each of the four housing types. Since the results are averages, the actual number of students in any given housing type will vary. The table below represents the resulting estimates for the subject property:

School Type	Qty. of New Residences	Housing Type	Average Qty. of Students per Residence	Total New Students	
Elementary	71	MF	0.201	14	
Middle 71		MF	0.077	5	
High	71	MF	0.084	6	

Table 3

POTENTIAL EFFECT OF THIS DEVELOPMENT ON SCHOOL ENROLLMENT

To determine the impact of the new residential development on school enrollment, the School District compares the school capacity to the current enrollment plus estimates of potential additional students resulting from land use cases over the previous two calendar years. A ratio of the existing and new students is then compared with the school design capacity and expressed as a percentage to show how much of the school capacity may be used.

School Name	School Type	School Enrollment	New Students During Past 2 yrs	New Student from this Case	Total New Students	School Design Cap.	Enroll. /Cap. Ratio
Battle Creek	Elem.	514	11	14	25	601	90%
Judson	Mid.	905	59	5	64	1,059	92%
Sprague	High	1,797	52	6	58	1,940	94%

Table 4

ESTIMATE OF THE EFFECT ON INFRASTRUCTURE – IDENTIFICATION OF WALK ZONES AND SCHOOL TRANSPORTATION SERVICE

Civic infrastructure needed to provide connectivity between the new residential development and the schools serving the new development will generally require roads, sidewalks and bicycle lanes. When developing within one mile of school(s), adequate pathways to the school should be provided that would have raised sidewalks. If there are a large number of students walking, the sidewalks should be wider to accommodate the number of students that would be traveling the

path at the same time. Bike lanes should be included, crosswalks with flashing lights and signs where appropriate, traffic signals to allow for safe crossings at busy intersections, and any easements that would allow students to travel through neighborhoods. If the development is farther than one mile away from any school, provide bus pullouts and a covered shelter (like those provided by the transit district). Locate in collaboration with the District at a reasonable distance away from an intersection for buses if the distance is greater than ½ mile from the main road. If the distance is less than a ½ mile then raised sidewalks should be provided with stop signs where students would cross intersections within the development as access to the bus stop on the main road. Following is an identification, for the new development location, that the development is either located in a school walk zone or is eligible for school transportation services.

School Name	School Type	Walk Zone or Eligible for School Transportation		
Battle Creek	Elementary	Eligible for School Transportation		
Judson	Middle	Eligible for School Transportation		
Sprague	High	Eligible for School Transportation		

Table 5

ESTIMATE OF NEW SCHOOL CONSTRUCTION NEEDED TO SERVE DEVELOPMENT

The School District estimates the cost of constructing new school facilities to serve our community. The costs of new school construction is estimated using the Rider Levett Bucknall (RLB) North America Quarterly Construction Cost Report and building area per student from Cornerstone Management Group, Inc. estimates. The costs to construct school facilities to serve the proposed development are in the following table.

School Type	Number of Students	Estimate of Facility Cost Per Student*	Total Cost of Facilities for Proposed Development*
Elementary	14	\$60,840	\$851,760
Middle	5	\$72,735	\$363,675
High	6	\$84,630	\$507,780
TOTAL			\$1,723,215

Table 6

Sincerely,

David Fridenmaker, Manager Planning and Property Services

c: Mike Wolfe, Chief Operations Officer, David Hughes, Director – Custodial, Property and Auxiliary Services, T.J. Crockett, Director of Transportation

^{*}Cornerstone Management Group, Inc. estimates based on RLB cost index average, 2020 Second Quarter.