# DONATION PUMP STATION AND FORCE MAION UPGRADE

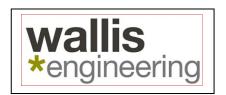
# **DEVELOPMENT PERMIT**



Google 2021, Image Capture October 2020

Submitted by Wallis Engineering and E<sup>2</sup> Land Use Service

March 23, 2022





# PROPERTY OWNER

CITY OF KELSO, WA

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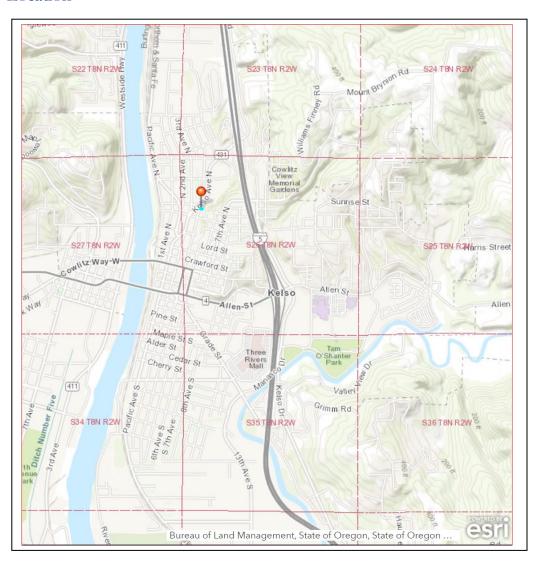
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# Location



# DONATION PUMP STATION and FORCE MAIN UPGRADE

## Site Basic Facts

# Pump Station

Address: North 4th Avenue	Parcel 22455	
Property ID 3036854	Parcel size: approximately 5,400 S.F.	
Property Owner: City of Kelso		
Zoning: RSF-5	Use: Permitted	

# Force Main

N. 4th Ave. does not have a property identification number and is not zoned. Utilities are allowed within existing ROWs.

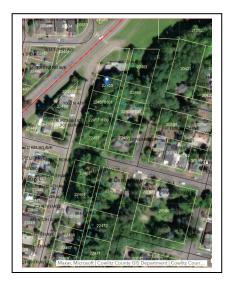
# **Existing Conditions**

# Pump Station

To the north of the Donation Pump Station (PS) is an existing single family residence. The abutting three lots to the south are undeveloped. Single family residences are further south along N 4<sup>th</sup> Ave. Uphill, to the east is a vacant lot. To the west, across N. 4<sup>th</sup> Ave., is an undeveloped and a developed residential lot.

The western property line is wooded and slopes steeply uphill. Catherine Morey, Kelso Stormwater Engineer, reports that Drainage Improvement District No. 1 filled the fish-bearing stream identified on the Department of Natural Resources (DNR) Forest Practices Application Mapping Tool (FPAMT) and that fish no longer traverse or inhabit the filled land.

The project site is located along the east side of the Cowlitz River drainage. Elevations range from about 20 feet at the pump station to about 25 feet near Harris Street (World Geodetic System of 1984 [WGS



84]). The PS is currently situated at the base of an approximately 50-foot-high north-south slope that ascends east to about elevation 70 feet. The ground slopes upward to the south at Harris Street to about elevation 75 feet near Columbia Street. The total slope height south of the terminus of N. 4th Ave. is about 50 feet. Site disturbance or development is not proposed in the steeply sloped area.

# Force Main Replacement

Within the N 4th Ave. right-of-way (ROW) and below the pavement there is an existing 8 inch force main on the east side of the street and an existing 10 inch force main on the west side.

# Project Proposal

# Pump Station

The City of Kelso proposes to increase reliability and operational efficiency of the Donation sanitary pump station. The Donation PS was originally built around 1950. The pump station equipment was removed and replaced in 1975. The existing pump station is a wet well/dry well configuration and consists of a 25-foot by 15-foot below-grade concrete structure with an above-ground masonry walled building. The structure extends approximately 23.5 feet below ground level. The dry well houses the pumps, motors, valves, and ancillary

equipment. The electrical and control panels are located above the ground floor of the structure with the existing standby diesel-fueled generator. The pump station operates continuously during heavy rains because of known inflow and infiltration problems in North Kelso. The project design will rehabilitate or replace the existing pump station essentially in the same plan area footprint.

#### Force Main

The project will also replace the existing 8" force main within 4th Ave. with a 16" HDPE force main running south from the pump station approximately 1,150 lineal feet. Replacing the existing 8 inch force main in a similar location, under the street, is not anticipated to generate any additional adverse environmental impacts.

# Kelso Narrative Form Content

✓ Describe the size of the structures and scope of each use, if any.

# Response

The proposal is to upgrade the existing Donation PS and replace the existing 8 inch force main with a 14 inch force main within N 4th Ave.

The PS improvements, as shown in Figures 2 and 3, include:

- 450 S.F. CMU utility building with a 9'-8" wall height and a lean-to style metal roof. Two person doors are to be located on the south elevation. A wet well access area and access gate are to be located on the west elevation.
- A replacement diesel powered standby generator measuring 3'-4" wide 15' long x 7'-9" high.
- The diesel generator will be enclosed by a 6-foot high concrete masonry wall which will provide necessary security and protection.
- Valve vault replacement on the west end between the building and the street. The vault will be surrounded on three sides by a 2-foot high curb wall.
- Utilities and general site improvements.
- ✓ Describe who will be using the structures and implementing the uses (for example; number of people, private or public, any fees . . . )

# Response

The city of Kelso Public Works department staff are the only persons who will use access and maintain the pump station and the force main.

✓ Describe timelines for construction and completion of structures, if any.

#### Response

Construction will begin in 2022 and will be completed in 2023.

✓ Describe timelines that apply to uses (for example: when the uses will take place, how frequently, hours of operation . . .)

# Response

The pump station and force main will operate 24 hours a day, 365 days a year. Kelso Public Works Department staff will visit the site for routine maintenance and as needed.

✓ Describe the current use of the area and surrounding area, if any. Please include only those uses that are immediately adjoining your proposal and those which are in the vicinity and may be affected by your proposal.

#### Response

The surrounding area is zoned RSF-5, and the uses include low density residential dwellings. Kelso has continuously used the site for sanitary pump station purposes since the early 1950s. The Donation PS and force mains are essential public facilities needed to provide sanitary service to this area of Kelso. In

that respect, the pump station and force main upgrade is essential to maintain the integrity and use of the single family dwellings nearby.

✓ Describe the structures currently on site and in the surrounding area (for example: how many, what size.

#### Response

The current use of the property is for a sanitary pump station. As shown in Figure 1, the current development includes an existing – pump station building, underground diesel tank, driveway, and wooden retaining wall. The sloped area of the property is vacant.

# Zoning - Applicable Development Regulations.

The PS site is zoned Residential Single Family-5,000 SF (RSF5) as are abutting lots. N 4th Ave. is not zoned. Kelso Municipal Code (KMC), Chapter 17, Unified Development Code, regulates land use activities. Per KMC Table 17.18.040, a "Public facility/park" is a permitted use in the RSF-5 zone. The same table indicates that "Public works/utility building" is a classified use in the RSF-5 zone. The KMC does not define the terms public facility/park or public works/utility building, however, the city has determined that the Donation PS is a public facility and is a permitted use in the RSF-5 zone. The City of Kelso has determined that the Donation PS is a utility, a "Public Facility," and is a permitted use.

Density, dimension, height, and setback requirements, KMC 17.22.020

Table 17.22.020-A

Standard	Code Required (feet)	Proposed (feet)
Maximum Residential Density	8.7	NA
Minimum Lot Width	25	Existing lot $= 50$
Maximum Building Height	35	9' 8" wall height
<u>Setbacks</u>		
- Front	20	14'-9" to building (existing setback), valve vault
		at edge of ROW
- Side Street	7	NA
- Side	5	North = $11$ , South = $7$ to generator
- Rear	10	Greater than 10
Maximum Lot Coverage with	50%	Less than 50%
Impervious Surfaces		

The pump station proposal, except for the front yard setback, will meet the required dimension and setback requirements. The front yard setback from the edge of right-of-way (ROW) to the existing building is approximately 15 feet. The proposed replacement building, to be built in the same footprint, will be 14'9" from the edge of the ROW. Consequently, the applicant will apply for a front yard setback adjustment.

# B. All required setbacks:

- 1. Must comply with the landscaping provisions of Section 17.22.100;
- 2. May not include impervious or hardened surfaces except for approved driveways and sidewalks;
- 3. May include low impact development stormwater design features;
- 4. May include underground structures provided that they do not encroach on easements or neighboring properties. It is the responsibility of the property owner to ensure compliance with this provision and to maintain the underground structure;

<sup>&</sup>lt;sup>1</sup> A Public facility/park is subject to compliance with FN 17, "Only permitted in accordance with the provisions of Section <u>17.22.290</u>, Public facilities." (essentially landscape screening and fencing).

- 5. May include overhead and underground utilities; and
- 6. Shall maintain a clear sight triangle at the intersection of driveways or access roads and the street rights-of-way to assure traffic safety in accordance with the provisions of the Kelso Engineering and Design Manual.
- 7. Where existing front setbacks directly abutting a lot are less than that required by Table 17.22.020, the front setback yard may be reduced to the average depth of the existing setbacks.

#### Response

The front yard setback includes an existing driveway which will be improved to city standards. As a condition of approval, the front yard driveway will meet the clear site triangle provisions of the Kelso Engineering and Design Manual. Overhead utility wires will continue to cross side and front yard setbacks.

- E. The following projections are permitted into required setbacks:
- 2. Outside stairs, platforms or landing places, if unroofed and unenclosed, may extend into required setbacks according to the following:
  - a. Front and side setback: maximum of four feet;
  - b. Rear setback: maximum of four feet.

#### Response

A small set of stairs will be created within the north and south side yard setbacks.

# Fences, hedges, and walls, KMC 17.22.080

B. No fence, hedge or wall shall be allowed to contain barbed, razor or other types of wire designed to cause injury to persons or animals except within the LI and GI zones.

Table 17.22.080

Zone class	Maximum Height Front Yard Setback	Maximum Height Rear and Side Yard Setback
RSF-5	42"	6'
Proposed	2' concrete curb wall around three sides of valve vault within setback	6' retaining wall within south side yard setback

# Response

The proposed concrete curb wall around the valve vault and 6-foot retaining wall comply with table 17.22.080.

# Clearing and grading, KMC 17.22.090

- A. The purpose of this provision includes but is not limited to promoting public health, safety, and welfare by regulating the preconstruction clearance of vegetation and trees in order to preserve and protect natural vegetation, wetlands, watercourses, and wildlife habitat; minimize erosion and sedimentation; minimize adverse effects on ground and surface waters; enhance the appearance and character of the city; and to comply with state and federal regulations.
- B. The following clearing and grading activities require city review and approval through the issuance of a clearing and grading permit, building permit, or other permit(s) issued by the city, unless specifically exempted:
  - 1. Land disturbing activities which are commonly referred to as:
    - a. Clearing (the act of vegetation removal from the land surface by mechanical or chemical means);
    - b. Grubbing (the act of root vegetation removal from beneath the surface of the earth usually in association with clearing);
    - c. Excavation (the mechanical removal of earth material);
    - d. Filling (deposition of earth material placed by artificial means);
    - e. Grading (excavation or filling or combination thereof);
    - f. Compaction (densification of earth material by artificial means, including that associated with stabilization of structures and road construction);

- g. Stockpiling (temporary deposition of earth material placed by artificial means); and
- h. Stabilizing (counteracting the actions of gravity, wind, or water).
- C. The following activities do not require a permit from the city, unless they involve an environmentally sensitive area, jurisdictional shoreline area, or required buffer:
  - 1. Routine vegetation management that does not involve the use of heavy equipment such as bulldozers or excavators;
  - 2. Routine yardwork maintenance and gardening activities such as lawn mowing and gardening;
  - 3. The removal of diseased, damaged, or unwanted trees from an existing yard or landscaped area;
  - 4. The excavation of less than fifty cubic yards of material over the life of a project;
  - 5. The placement of less than fifty cubic yards of fill of the life of a project;
  - 6. The storage or stockpiling of less than fifty cubic yards of material such as fill, gravel, sand, beauty bark, etc.
- D. For the applicable clearing and grading standards please refer to the Kelso Engineering and Design Manual as well as the International Building Code as adopted by the city of Kelso.

#### Response

The existing PS site, within the footprint of the improvements, will be cleared, graded, and resurfaced to facilitate the operational needs of the facility. A combination of asphalt and concrete surfaces will be constructed to facilitate both vehicular and pedestrian access to the site, equipment and pump station building. Approximately 9 cubic yards of material will be cut from the site and approximately 18 cubic yards of material will be filled on the site to construct the improvements.

# Landscaping KMC 17.22.100

- B. A landscaping plan shall be required for all proposed development activities, including new construction, the expansion of existing structures, subdivisions, binding site plans, and master plans in accordance with the provisions of this section; provided, that:
  - 5. The city may approve alternative methods or standards; provided, that they meet or exceed the required standards and are consistent with the intent of this section.
  - 6. The city may approve variances from the standards in this section in accordance with the provisions of this title.

#### Response

The force main will be constructed within existing ROW; landscaping the street is not required. The existing PS lot is heavily wooded to the east. To the south and east the slopes are also heavily wooded. The abutting lot to the north is partially screened from the existing PS by mature trees and shrubs. The PS building is effectively screened to the north, east and south by existing mature vegetation. To the east, the building faces N 4th St. The applicant proposes to leave the mature trees and shrubs in place and proposes that such vegetative conservation provides an alternative method of landscaping that exceeds the required landscape standards and is consistent with the intent of KMC 17.22.100.

E. Landscaped Area Requirements. All development activities including new construction, the modification of existing structures, subdivisions, binding site plans, and master plans must provide at least the following amount of on-site landscaped areas (including required landscaping in parking lots), unless otherwise provided in this section:

#### Response

There is no minimum on-site landscape area requirement in the RSF-5 zone.

G. Perimeter Landscaping Buffer Requirements. In addition to the on-site landscaping requirements, all development activities including new construction, the modification of existing structures, subdivisions, binding site plans, and master plans in the multifamily residential zone (RMF), the commercial zones (NC, GC, RC) (excluding the downtown design review overlay) and the industrial zones (LI and GI) shall also provide an additional landscaped buffer along any property lines abutting a single-family residential zone (RSF-5/10 or RMD) in accordance with the following provisions:

#### Response

Perimeter landscaping buffers are not required in the RSF-5 zone.

#### Parking 17.22.110

Project sponsors must make adequate provisions to meet the projected parking needs associated with all new development activities, including the construction of new buildings, the expansion of existing buildings, changes of use, and/or changes to the terms and conditions of occupancy such as enlarging, moving, or increasing capacity by creating or adding dwelling units, commercial or industrial floor space, or seating facilities.

# A. General Requirements.

- 1. Driveways, parking areas, and walkways shall be designed in accordance with the provisions of the Kelso Engineering Design Manual and shall accommodate pedestrians, motor vehicles and bicycles used by occupants or visitors of a building or use.
- 2. No building permit shall be issued until the city has approved plans that demonstrate that all parking requirements can be met.
- 3. Existing parking deficits of legally established uses assigned to existing structures shall be allowed to continue even if a change of use occurs; provided, that in the judgment of the city the new use would not necessitate more parking spaces than the previous use.
- 4. Parking spaces serving residential dwelling units shall be located on the same lot with the building they serve, unless plans submitted for off-site or shared parking are approved by the city.

# Response

The proposal does not include designated parking areas. Public Works currently parks in the driveway while maintaining the existing PS. The practice will continue for the foreseeable future.

#### B. Spaces Required.

- 1. All parking lots shall comply with the minimum requirements for handicapped parking spaces, as required by Washington State regulations related to barrier-free facilities.
- 3. For all nonresidential uses or for special cases involving new residential developments, the required minimum parking amount shall be determined by the city. For determination by the city, the applicant shall supply:
  - a. Documentation regarding actual parking demand for the proposed use; or
  - b. Technical studies relating the parking need for the proposed use; or
  - c. Required parking for the proposed use as determined by other comparable jurisdictions.

#### Response

The proposal does not include designated parking areas. Consistent with subsection 17.22.110.A.3, if the city has concluded that the current pump station use has a parking deficiency, the existing parking deficit "shall be allowed to continue even if a change of use occurs; provided, that in the judgment of the city the new use would not necessitate more parking spaces than the previous use." Therefore, additional parking spaces are not required.

# Stormwater management 17.22.120

- A. The city is required to manage stormwater runoff in accordance with the provisions of federal and state law and a National Pollutant Discharge Elimination System permit. As a result, the city has established a stormwater utility, adopted the Stormwater Manual for Western Washington prepared by the Washington State Department of Ecology, adopted local stormwater standards, and encourages the implementation of low impact design features.
- 1. For the applicable stormwater standards and requirements please refer to the Kelso Engineering Design Manual. Response

Stormwater from the replaced and created hard surfacings on site will be managed by sheet flowing runoff to the N  $4^{th}$  Avenue Right of Way where it will be collected by existing and proposed storm sewer collection infrastructure and conveyed offsite. Building roofs will be conveyed through gutters and roof downspouts to disperse overland or connect to the existing N  $4^{th}$  Ave. storm sewer system.

Created and replaced hard surfaces are anticipated to be above 2,000 square feet but below 5,000 square feet. Per the Kelso Engineering Design Manual, all created and replaced hard surfaces will be required to comply with Minimum Requirements #1-5 of the referenced Stormwater Manual. Compliance with Minimum Requirement #5 will be provided by sheet flow runoff to the Right of Way and from driveways and walkways and through roof downspout gutter connections to the existing stormwater system from the roof.

Geotechnical investigations completed in January 2022 indicate that groundwater is present as shallow as 2.4 feet below the ground surface adjacent to the site making infiltration based BMPs infeasible. Other site constraints, including limited landscaping areas, will make other LID BMPs such as sheet flow dispersion infeasible as well.

# Variances, KMC 17.10.190

This section shall govern the issuance of variances for certain provisions of this title.

A. A variance may be granted to the density, dimension, height, setback, and development standards; provided, that all other provisions of this title can be met.

# Response

The applicant proposes to vary from the required 20-foot front yard setback. The proposed Donation PS upgrade will take place in the same footprint of the existing pump station. The front yard setback deficiency is a preexisting condition. The pump station improvements cannot be moved further eastward due to steep slope constraints in the center and eastern portions of the property as well as the City's intent to use the existing below grade structure for pump station operation. Other than the front yard setback, the proposed pump station and force main projects meet the provisions of Title 17.

B. Under no circumstances shall the city grant a variance to allow a use not permissible under the terms of this title in the zoning district involved, or any use expressly or by implication prohibited in the zoning district by the terms of this title. Response

The proposed front yard setback variance is consistent with the existing setback. The public facility use is a permitted use in the RSF-5 zone. The pump station is an essential public utility necessary to serve the residential zone in which it is located as well as other areas of the city. The proposed front yard setback dimension is not expressly or impliedly prohibited in the RSDF-5 zone.

- C. Variances may be approved by the city based on a finding that such variance will not be contrary to the public interest and the comprehensive plan or where literal enforcement of the provisions of this title would result in undue hardship. A variance shall not be granted unless the city further finds that the applicant has demonstrated all of the following:
  - 1. That special circumstances applicable to the subject property, including size, shape, topography, location, or surroundings, do exist; and

#### Response

The Donation PS is an existing public utility facility which serves the nearby zoning districts and uses encouraged by the Kelso Comprehensive Plan. The property, used for pump station use since the 1950s, is constrained by steep slopes to the east of the existing facility. To relocate the pump station further east would, in the opinion of GRI, a qualified geotechnical engineering firm, require additional geo-hazard analysis.

2. That because of such special circumstances, strict application of this title would deprive the subject property of rights and privileges enjoyed by other properties in the vicinity under identical zoning district classification; and

#### Response

The city of Kelso is the property owner. The Donation PS is an existing public facility approved, constructed, and maintained by the city. Denying the front yard setback variance to move the pump station 20 feet further east could result in adverse impacts to steep slopes and might entail significant site stabilization costs which could make the project infeasible. Such a result would be a substantial burden and potential loss of service for existing residences and uses that depend on the Donation PS.

3. That the granting of the variance will not be materially detrimental to the public welfare or injurious to the property or improvements in the vicinity and zoning district classification in which the property is situated; and

# Response

The Donation PS is an existing public utility facility which services the public consistent with the Kelso Comprehensive Plan. Upgrading the facility in its current location is beneficial to the public and not detrimental to their sanitary sewer service needs.

4. That the special circumstances do not result from the actions of the applicant; and

#### Response

Granting the front yard setback variance is unique to this property. There are no other properties in the area which the city has identified for potential pump station use. At the time the Donation pump station was constructed, the property was not zoned. The city proposes to use the existing disturbed area to minimize the impact of the pump station use.

5. That the granting of a variance will be in harmony with the general purpose and intent of this title, the specific zoning district, and the comprehensive plan.

# Response

The Donation PS is an existing public utility facility which serves the nearby zoning districts and uses encouraged by the Kelso Comprehensive Plan. The future operation of the pump station is an essential element of the city's long range land use and engineering plans.

### Critical Areas

The Cowlitz County EPIC web mapping system identifies the following potential critical areas on or near parcel 22455, as shown on the map below:

# On-Site

- Slopes 30% to 45% (pink)
- Two foot contours (yellow lines)
- Fish bearing riparian area (blue line running diagonally in western third of property)
- DAHP Archaeological predictive risk model high²

# Near the site

• Flood plain across N 4th Avenue (light green)

Deep seated landslide and deep seated scarp Red color and red line to northeast)

There are no mapping indicators for wellhead protection zones, critical area aquifer recharge areas, wetlands or hydric soils, or shorelines on or adjacent to the site.

<sup>&</sup>lt;sup>2</sup> The Donation PS is not listed as a City of Kelso or Washington State historic resource.



https://cowlitz.maps.arcgis.com/apps/webappviewer/index.html?id=5f8bb5c362a449648606077d1fcbf764&query=EPIC%20Data, PARCNO,22455

KMC 17.26 regulates critical areas.

#### Response

#### Fish and Wildlife Habitat Conservation Areas, KMC 17.26.060

Fish bearing stream are classified as "segments of natural waters which are not classified as Type S water and have fish, wildlife, or human use. These are segments of natural water and periodically inundated areas of their associated wetlands." KMC 17.26. When development potentially impacts a fish bearing streams, a qualified fish and wildlife biologist should develop mitigation plans. KMC 17.26.060.B.

However, in this case, the city has determined that the stream identified on the EPIC web site was filled many decades ago as part of the city's diking program. Consequently, the proposed upgrade of the existing Donation PS cannot adversely impact a stream or fish habitat which no longer exists.

# Geological Hazard Areas, KMC 17.26.080

This section applies to erosion, landslide, and seismic hazards. The chapter exempts from permit review "maintenance, repair, or replacement that does not expand the footprint area of utility facilities." KMC 17.26.080.A.2.a.v.H.

As shown on the Cowlitz County EPIC web mapping system, the areas of steep slopes are exclusively at the mid and rear of the property. The 2-foot contours, essentially flat areas, are located on the western portion of the site. The proposed upgrade of the Donation PS will occur essentially within the existing footprint or disturbed area of the property.

GRI, a qualified geotechnical engineering firm, conducted a site visit and completed a geotechnical slope assessment dated September 8, 2021, for this project. (See Exhibit B, W-1304A Geotechnical Slope Assessment) GRI conducted surface reconnaissance of the area on August 19, 2021, to visually observe the pump station, the slope along the east side of N 4 Avenue, and the slope area of N 4 Avenue between Harris Street and Columbia Street. GRI did not observe obvious indications of recent large-scale or deep-seated landslide movements such as new ground cracking, fresh scarps, or accumulations of recent landslide debris

around the pump station. Areas of major erosion, fault rupture, or other geological hazards were not observed during the reconnaissance.

GRI experts concluded, "Given the new pump station will be constructed in essentially the same plan area footprint and no new walls or cuts are currently planned, it is our opinion the potential for steep slope hazards or landslide hazards to affect the proposed pump-station improvements is low. In our opinion, the risk of a seismically induced deep-seated landslide is low for a code-level earthquake." However, GRI cautioned that if new walls or cuts are required in the slope east of the pump station, additional geotechnical investigation and design for new retaining structures should be anticipated.

Because the replacement activity will occur essentially within the foot print of the existing PS disturbed area, which is not classified as a steep slope, a critical area permit is not required for the project as envisioned. However, if the project revisions necessitate impacting the steep sloped outside of the existing disturbed area, a critical area permit for geologic hazards may be required.

# **CONCLUSIONS**

The Donation PS is a permitted use in the RSF-5 zone. Upgrading the pump station and the force main is consistent with the Kelso Comprehensive Plan, Wastewater Master Plan, and sound engineering principles. Improving the city's sanitary waste collection system is essential to the public health and well-being. The applicant has demonstrated that the proposed upgrade of the pump station and force main is not only essential but is also consistent with Title 17 of the Kelso Municipal Code, except for the front yard setback.

Because the proposal will upgrade the existing pump station within essentially the same footprint and because of the slope constraint to the east of the facility, the applicant has demonstrated that granting the front yard setback variance is not only necessary, but it is also consistent with LMC 17.10.190 and is not detrimental to the public welfare.

For these reasons and more we ask the city of Kelso to approve the Donation pump station and force main upgrade proposal.

# EXHIBIT A – KELSO APPLICATION DOCUMENTS

- MASTER LAND USE APPLICATION FORM
- ADMINISTRATIVE USE CHECKLIST
- VARIANCE CHECKLIST
- CRITICAL AREA CHECKLIST
- STATE ENVIRONMENTAL POLICY ACT (SEPA) CHECKLIST

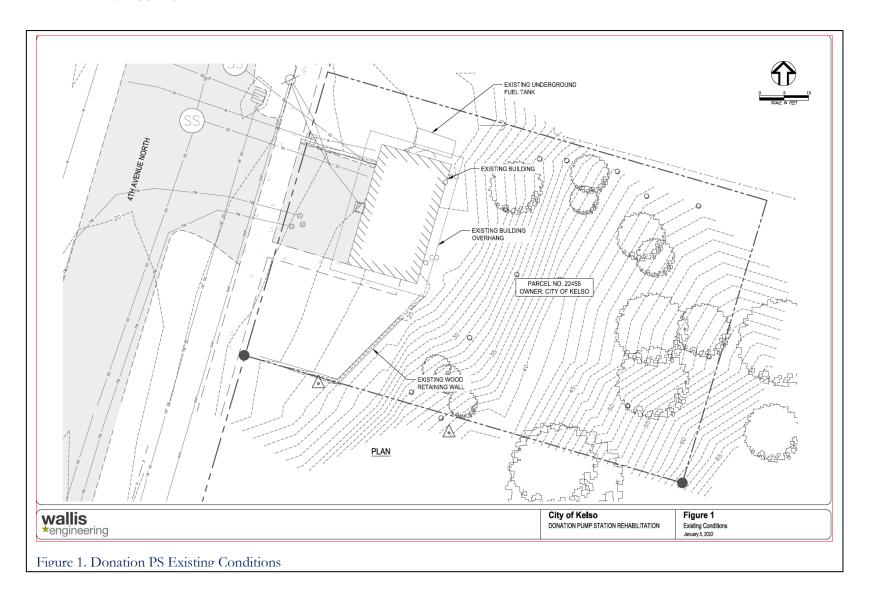
# **EXHIBIT B - FIGURES**

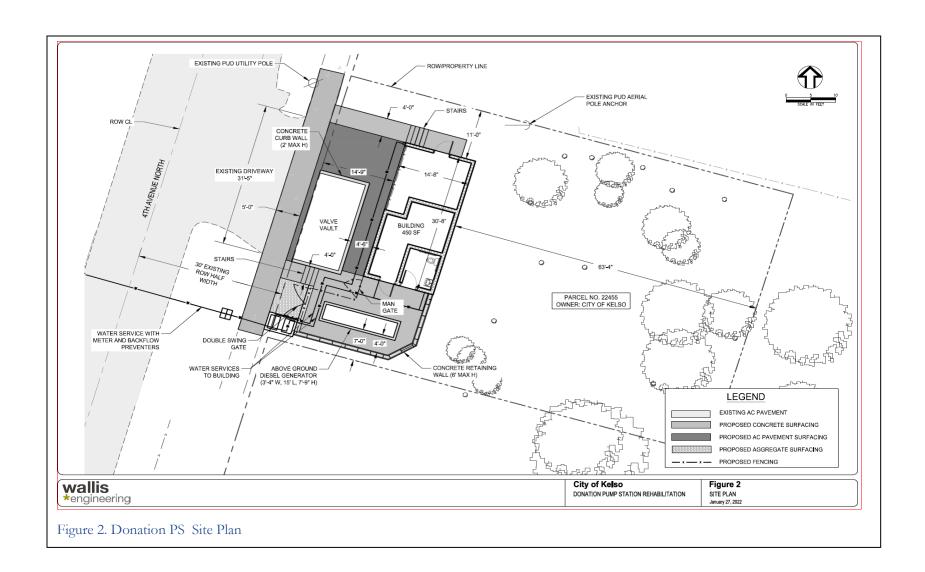
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- 2. Donation PS Proposed Site Plan (1/27/22)
- 3A & 3B DONATION PS PROPOSED ARCHITECTURAL ELEVATIONS (2/22)
- DONATION FORCE MAIN PLANS

# **EXHIBIT C - TECHNICAL REPORTS**

- GEOTECHNICAL SLOPE ASSESSMENT
- DONATION PS SURVEY AND TITLE (6 FILES)

# **EXHIBIT B. FIGURES**





Figures 3a and 3b, Architectural Elevations

