MONTGOMERY COUNTY HISTORIC PRESERVATION COMMISSION STAFF REPORT			
19 Montgomery Avenue, Takoma Park	Meeting Date:	3/23/2022	
Outstanding Resource <b>Takoma Park Historic District</b>	Report Date:	3/16/2022	
	Public Notice:	3/9/2022	
(Richard J Vitullo, Architect)	Tax Credit:	N/A	
Preliminary Consultation	Staff:	Michael Kyne	
	<b>STAFF REPORT</b> 19 Montgomery Avenue, Takoma Park Outstanding Resource <b>Takoma Park Historic District</b> Marwan Hishmeh (Richard J Vitullo, Architect)	STAFF REPORT19 Montgomery Avenue, Takoma ParkMeeting Date:Outstanding ResourceReport Date:Takoma Park Historic DistrictPublic Notice:Marwan Hishmeh (Richard J Vitullo, Architect)Tax Credit:	

**Preliminary Consultation** 

**Permit Number:** 984286 & 975312

#### **STAFF RECOMMENDATION**

Staff recommends that the applicant make any revisions based upon the HPC's comments and return with a HAWP application.

#### **ARCHITECTURAL DESCRIPTION**

SIGNIFICANCE:	Outstanding Resource within the Takoma Park Historic District
STYLE:	Bungalow
DATE:	c. 1910s-20s



Fig. 1: Subject property.

**PROPOSAL:** Screened porch addition, after the fact parking pad in front yard, door alteration, after the fact basement window and door alterations, foundation re-parging

#### **PROPOSAL**

The applicant proposes a screened porch addition, an after the fact parking pad in the front yard, door alteration, after the fact basement window and door alterations, and foundation re-parging at the subject property.

#### **APPLICABLE GUIDELINES**

When reviewing alterations and new construction within the Takoma Park Historic District several documents are to be utilized as guidelines to assist the Commission in developing their decision. These documents include the historic preservation review guidelines in the approved and adopted amendment for the *Takoma Park Historic District (Guidelines), Montgomery County Code Chapter 24A (Chapter 24A)*, and *the Secretary of the Interior's Standards for Rehabilitation (Standards)*. The pertinent information in these documents is outlined below.

#### Takoma Park Historic District Guidelines

There are two very general, broad planning and design concepts which apply to all categories. These are:

- The design review emphasis will be restricted to changes that are at all visible from the public right-of-way, irrespective of landscaping or vegetation (it is expected that the majority of new additions will be reviewed for their impact on the overall district), and
- The importance of assuring that additions and other changes to existing structures act to reinforce and continue existing streetscape, landscape, and building patterns rather than to impair the character of the historic district.

The Guidelines define Outstanding Resources as:

A resource which is of outstanding significance due to its architectural and/or historical features. An outstanding resource may date from any historical period and may be representative of any architectural style. However, it must have special features, architectural details and/or historical associations that make the resource especially representative of an architectural style, it must be especially important to the history of the district, and/or it must be especially unique within the context of the district.

The *Guidelines* state the following regarding the review of Outstanding Resources:

These resources have the highest level of architectural and/ or historical significance. While they will receive the most detailed level of design review, it is permissible to make sympathetic alterations, changes and additions to Outstanding Resources.

As a set of guiding principles for design review of Outstanding Resources, the Historic Preservation Commission will utilize the Secretary of the Interior's "Standards for Rehabilitation".

Specifically, some of the factors to be considered in reviewing HAWPs on Outstanding Resources [only guidelines applicable to this project included]:

• Plans for all alterations should be compatible with the resource's original design; additions, specifically, should be sympathetic to existing architectural character, including massing, height, setbacks, and materials

- Emphasize placement of major additions to the rear of existing structures so that they are less visible from the public right-of-way
- While additions should be compatible, they are not required to be replicative of earlier architectural styles
- Preservation of original and distinctive architectural features, such as porches, dormers, decorative details, shutters, etc. is encouraged
- Preservation of original windows and doors, particularly those with specific architectural importance, and of original size and shape of openings is encounged
- Preservation of original building materials and use of appropriate, compatible new materials is encouraged
- All changes and additions should respect existing environmental settings, landscaping, and patterns of open space.

#### Montgomery County Code; Chapter 24A-8

- (a) The commission shall instruct the director to deny a permit if it finds, based on the evidence and information presented to or before the commission that the alteration for which the permit is sought would be inappropriate, inconsistent with or detrimental to the preservation, enhancement or ultimate protection of the historic site or historic resource within an historic district, and to the purposes of this chapter.
- (b) The commission shall instruct the director to issue a permit, or issue a permit subject to such conditions as are found to be necessary to ensure conformity with the purposes and requirements of this chapter, if it finds that:
  - (1) The proposal will not substantially alter the exterior features of an historic site or historic resource within an historic district; or
  - (2) The proposal is compatible in character and nature with the historical, archeological, architectural or cultural features of the historic site or the historic district in which an historic resource is located and would not be detrimental thereto or to the achievement of the purposes of this chapter; or
  - (3) The proposal would enhance or aid in the protection, preservation and public or private utilization of the historic site or historic resource located within an historic district in a manner compatible with the historical, archeological, architectural or cultural value of the historic site or historic district in which an historic resource is located; or
  - (4) The proposal is necessary in order that unsafe conditions or health hazards be remedied; or
  - (5) The proposal is necessary in order that the owner of the subject property not be deprived of reasonable use of the property or suffer undue hardship; or
  - (6) In balancing the interests of the public in preserving the historic site or historic resource located within an historic district, with the interests of the public from the use and benefit of the alternative proposal, the general public welfare is better served by granting the permit.
- (c) It is not the intent of this chapter to limit new construction, alteration or repairs to any 1 period or architectural style.

(d) In the case of an application for work on an historic resource located within an historic district, the commission shall be lenient in its judgment of plans for structures of little historical or design significance or for plans involving new construction, unless such plans would seriously impair the historic or architectural value of surrounding historic resources or would impair the character of the historic district. (Ord. No. 9-4, § 1; Ord. No. 11-59.)

#### Secretary of the Interior's Standards for Rehabilitation

The Secretary of the Interior defines rehabilitation as "the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features, which convey its historical, cultural, or architectural values." The *Standards* are as follows:

- 2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
- 9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
- 10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

#### STAFF DISCUSSION

The subject property is a c. 1910s-20s Bungalow-style Oustanding Resource within the Takoma Park Historic District. There is an original one car attached garage at the south/rear basement level, which was previously expanded, with an addition above. There is also an attached shed at the rear basement level on the west (right, as viewed from the public right-of-way of Montgomery Avenue) side of the garage. The 1927 Sanborn Fire Insurance Map indicates that there was originally a full length one story open structure in the location of the attached shed (*Fig. 2*).

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Fig. 2: 1927 Sanborn Fire Insurance Map, with subject property outlined in red.

In November 2021, staff was notified that unpermitted work had been completed at the subject property. Staff worked with the Department of Permitting Services to issue a Stop Work Order and Notice of Violation, and the the applicant was instructed to submit a HAWP application for the unpermitted work. In December 2021, the applicant submitted a HAWP application for the unpermitted construction of a gravel parking pad at the front of the property (*Fig. 3*), as well as work that had not yet commenced, namely front door replacement and construction of a new screened porch at the rear; however, staff visited the property and determined that additional unpermitted work had been completed, and there were many discrepancies with the submitted architectural drawings.



Fig. 3: Staff's December 2021 site visit photograph, with the unpermitted gravel parking pad in the foreground.

Additional unpermitted work discovered during staff's site visit included installation of new basement level windows on the front porch, installation of one new egress window with window well at the basement level on each side of the historic house (two total), replacement of windows on the existing rear addition (above the attached rear garage), enclosure of the attached rear garage, siding replacement on the existing rear addition, and infill of one original window on the rear elevation (see *Figs. 4 - 8* below).



Fig. 4: Staff's December 2021 site visit photograph, showing the unpermitted windows on the basement level of the front porch.



Fig. 5: Staff's December 2021 site visit photograph, showing the unpermitted basement level egress window with window well on the west/right side of the historic house.



Fig. 6: Staff's December 2021 site visit photograph, showing the unpermitted basement level egress window with window well on the east/left side of the historic house.



Fig. 7: Previously existing conditions at the rear of the historic house. Photograph provided by the applicant.



Fig. 8: Staff's December 2021 site visit photograph, showing unpermitted work at the rear of the historic house.

The applicant was notified that the application was incomplete, that the submitted architectural drawings needed to be corrected, and/or that the property should be returned to its previous condition. The applicant has since hired a new architect to correct the discrepancies in the application, and some of the unpermitted work has been remediated. Based on the current submission, the unpermitted basement level windows on the front porch have been removed (*Fig. 9*), and the proposal to replace the existing front door (which may be original) has been removed from the application at staff's suggestion (*Fig. 10*).



Fig. 9: Current photograph from the applicant, showing that the unpermitted basement level windows on the front porch have been removed.



Fig. 10: Staff's December 2021 site visit photograph, showing the existing (perhaps original) front door, which is no longer proposed to be replaced.

Staff notes that they would not have supported the new basement level windows on the front porch. While the Commission typically exercises greater leniency for basement level fenestration alterations on secondary elevations, the windows in question were on the primary elevation, where they were highly visible, and they altered the original front porch, a significant character-defining feature of the subject property.

In a March 14, 2022 email to staff, the applicant stated that other unpermitted work items at the front and right side of the property, including construction of the gravel parking pad at the front of the property and installation of the new egress window with window well at the basement level on the west/right side of the historic house, have been remediated. <u>The applicant should be prepared to present current</u> photographs and supporting documentation to demonstrate that these items have been appropriately remediated at the March 23, 2022 preliminary consultation.

Staff notes that they would not have supported the parking pad at the front of the property, as front parking pads are incompatible with the surrounding streetscape and with the historic district as a whole.

Per the current application, the applicant proposes the following work items at the subject property:

#### North/Front Elevation

• Installation of new steel handrails with steel balusters on both sides of the front porch stairs (two handrails total).

#### West/Right Elevation

• After the fact replacement of the existing doors on the first floor and basement level with new wood 6-lite doors (two doors total).

#### South/Rear Elevation

- After the fact installation of a new solid steel door on the south/rear elevation of the existing attached shed.
- After the fact infilling of the south/rear opening/garage door of the existing attached garage, adding a wood framed wall, wood siding, and two single-lite aluminum-clad wood casement windows.
- After the fact restoration/replacement of the wood siding on the existing addition above the attached garage.
- After the fact replacement of the existing door on the basement level with a new wood 6-lite door.
- After the fact replacement of the three original basement level wood windows with new singlelite aluminum-clad wood windows (two casements windows and one awning window).
- After the fact infilling of one original window on the first floor.
- Construction of a new first floor screened porch addition on wood posts, with the following specifications:
  - To be constructed from wood with PVC screening and membrane roofing to match the roofing of the existing/adjacent rear addition.
  - 24'-6" wide x 16'-10" (414 sf).
  - Inset 3' from the east/left corner of the historic house and 6" from the south/rear wall plane of the existing rear addition.
  - $\circ$  4'-3" x 4'-3" wood stoop and stairs to grade at the south/rear.

#### East/Left Elevation

- After the fact replacement of the three original basement level wood windows (two paired) with new single-lite aluminum-clad wood windows.
  - The north/frontmost window to include a window well for egress purposes.

#### Other

- Repair and repaint the original windows throughout the house.
- Repair and repaint the original front door.
- Reparge the existing CMU house foundation.

Staff notes that the wood stoop and stairs to grade on the west/right elevation, as well as the architectural asphalt roofing on the main house, were previously replaced via Staff-Level Approval, and they are not part of the current application.

Staff is generally supportive of the proposed work items that remain part of the current application, finding them consistent with the *Guidelines* and *Standards #2*, *#9*, and *#10*. The proposed alterations are generally compatible with the resource's original design, and the proposed new screened porch is sympathetic with the existing architectural character, massing, height, setback, and materials of the historic house, per the *Guidelines*. The proposed new screened porch is also in the preferred location at the rear of the historic house, where it will be negligibly visible from the public right-of-way, at best.

The windows and doors that are proposed to be replaced are at the basement level on the rear and secondary elevations, where the Commission typically exercises greater leniency in their review. Staff also finds that the proposed south/rear fenestration alterations will not be visible from the public right-of-way. As stated in the *Guidelines*, "[t]he design review emphasis will be restricted to changes that are at all visible from the public right-of-way, irrespective of landscaping or vegetation". Likewise, the proposed east/left side fenestration alterations will be negligibly visible, at best, due to the house's proximity to the east/left property line and an existing fence in that location.

Regarding the original window to be infilled on the first floor of the south/rear elevation, staff finds that this alteration will not be visible from the public right-of-way, and it will not significantly detract from the character of the subject property, even with its designation as an Outstanding Resource.

#### Questions for the HPC

- Staff asks that the Commission concur/reiterate that the previously proposed basement level windows on the front porch and front parking pad are incompatible with subject property and surrounding streetscape, and that the applicant should sufficiently demonstrate that these unpermitted work items have been appropriately mitigated.
- Are there any outstanding concerns with the current proposal?

#### **STAFF RECOMMENDATION**

Staff recommends that the applicant make any revisions based upon the HPC's comments and return with a HAWP application.

ICOMERY CO	HAWP# <u>984286</u> DATE ASSIGNED
APPLICATION HISTORIC AREA WO HISTORIC PRESERVATION 301.563.340	
APPLICANT:	
<sub>Name:</sub> Marwan Hishmeh	E-mail:
Address: 904 Erie Avenue	City: Takoma Park zip: 20912
Daytime Phone: <u>301-448-0704</u>	Tax Account No.:
AGENT/CONTACT (if applicable):	
Name: Richard J Vitullo AIA	<sub>E-mail:</sub> rjv@vitullostudio.com
Address: 7016 Woodland Avenue	City: Takoma Park zip: 20912
Daytime Phone: <u>301-806-6447</u>	Contractor Registration No.:
LOCATION OF BUILDING/PREMISE: MIHP # of Histori	c Property
Is the Property Located within an Historic District?	/es/District Name
Is there an Historic Preservation/Land Trust/Environme map of the easement, and documentation from the Eas	• •
Are other Planning and/or Hearing Examiner Approvals (Conditional Use, Variance, Record Plat, etc.?) If YES, in supplemental information.	
Building Number: <u>19</u> Street: <u>Mo</u>	ntgomery Avenue
Town/City: Takoma Park Nearest Cros	<sub>s Street:</sub> Philadelphia Avenue
Lot: 10 Block: 17 Subdivision:	BF Gilbert Parcel:
TYPE OF WORK PROPOSED: See the checklist on Pa for proposed work are submitted with this applica	
<b>be accepted for review.</b> Check all that apply:	Shed/Garage/Accessory Structure
New Construction	Solar Solar
Addition Ence	Tree removal/planting
□     Demolition     ✓     Hardscape/Lands       □     Grading/Excavation     □     Roof	cape 🖌 Window/Door Other:
I hereby certify that I have the authority to make the fo	
and accurate and that the construction will comply wit	· · · · · · · · · · · · · · · · · ·
agencies and hereby acknowledge and accept this to b Richard J. Vitullo AIA	be a condition for the issuance of this permit. 2/23/2022

OWNER: Ace Construction (Marwan Hishmeh) 904 Erie Ave. Takoma Park, MD 20912

#### AGENT FOR OWNER: Richard J. Vitullo AIA

**Vitullo Architecture Studio, PC** 7016 Woodland Ave. Takoma Park, MD 20912

## **Adjoining Property Owners**

## Kerry Richter

17 Montgomery Ave. Takoma Park, MD 20912

Laura Coughlin & Steven Edminster

25 Montgomery Ave. Takoma Park, MD 20912

**Rachel Sturke & Joshua Stebbins** 20 Montgomery Ave. Takoma Park, MD 20912

## Julian Mulvey & Margaret Omero

18 Montgomery Ave. Takoma Park, MD 20912

29 Hickory Avenue, Takoma Park

33 Hickory Avenue, Takoma Park

116 Elm Avenue, Takoma Park

Description of Property: Please describe the building and surrounding environment. Include information on significant structures, landscape features, or other significant features of the property:

See attached

Description of Work Proposed: Please give an overview of the work to be undertaken:

See attached

Work Item 1:			
Description of Current Condition:	Proposed Work:		
Work Item 2:			
Description of Current Condition:	Proposed Work:		

Work Item 3:		
Description of Current Condition:	Proposed Work:	

## HISTORIC AREA WORK PERMIT CHECKLIST OF APPLICATION REQUIREMENTS

	Required Attachments						
Proposed Work	I. Written Description	2. Site Plan	3. Plans/ Elevations	4. Material Specifications	5. Photographs	6. Tree Survey	7. Property Owner Addresses
New Construction	*	*	*	*	*	*	*
Additions/ Alterations	*	*	*	*	*	*	*
Demolition	*	*	*		*		*
Deck/Porch	*	*	*	*	*	*	*
Fence/Wall	*	*	*	*	*	*	*
Driveway/ Parking Area	*	*		*	*	*	*
Grading/Exc avation/Land scaing	*	*		*	*	*	*
Tree Removal	*	*		*	*	*	*
Siding/ Roof Changes	*	*	*	*	*		*
Window/ Door Changes	*	*	*	*	*		*
Masonry Repair/ Repoint	*	*	*	*	*		*
Signs	*	*	*	*	*		*

## DESCRIPTION OF <u>EXISTING</u> STRUCTURE, ENVIRONMENTAL SETTING AND HISTORICAL FEATURES AT:

## 19 Montgomery Ave., Takoma Park, MD 20912

This is an "Outstanding Resource" Bungalow built in 1918, and it is located in the Takoma Park Historic District. It is a 1-story house approx. 37.7' x 26.4', with a 8' x 26.5' front porch and a 1-story rear addition over a garage in the rear. Overall, it has a 1218 S.F. footprint, with a full basement.

- <u>a.</u> <u>Original House Structure:</u> The main house structure is wood framed and is gabled (5.75:12 pitch). The rear addition is a shed roof.
- **<u>b.</u>** <u>Front Porch:</u> The foundation is parged CMU, with a 4" thick concrete slab porch floor and steps. The porch sides are 28" high x 8" wide stuccco walls with a flat top rail/cap. The roof is gabled (5.75:12 pitch), set perpendicular to the main roof. There is no railing at stairs.
- *<u>c.</u> <u>Exterior Finish</u>: The exterior finish on the main house is smooth stucco over lath; the siding on the rear addition is wood beadboard set between posts.*
- d. Foundation: Parged CMU.
- e. Roof:
- <u>*f.*</u> <u>*Windows & Doors*</u>: Painted wood windows, predominately 6-over-1 double hungs, with some 6-lite casements. Many are dilapidated; most will be restored. Basement windows are generally painted wood double-hungs, 1-over-1.

**NOTE**: As the new architect of record for this revised HAWP application now documenting the property in its present state (after a significant number of changes had been made), I was not privy to observe the actual existing floor plans or elevations. Many windows, and 3 of 4 doors, had already been replaced when I documented the site; all of the new interior wall framing is also in place. Therefore, I am not able to provide existing plans and elevations. In their stead, I am attaching exterior photos provided by my client that show a majority of the original exterior issues; these photos are marked as "exist". The proposed exterior elevations show which windows and doors are "new" versus "existing".

## DESCRIPTION OF THE <u>PROPOSED</u> PROJECT AND ITS EFFECT ON THE HISTORIC RESOURCE: <u>19 Montgomery Ave., Takoma Park, MD 20912</u>

## Alteration to existing House/Property:

- a. <u>Existing Rear Structure</u>: The existing 1<sup>st</sup> floor rear wood addition will be restored and re-painted.
- b. <u>Windows and Doors:</u> All existing wood windows and front entry door on 1<sup>st</sup> floor level will be restored and repainted, except one rear-facing 1<sup>st</sup> floor window in new bathroom that is to be closed up as it is now in a shower. Both basement entry doors and 1<sup>st</sup> floor side door will be new painted wood doors with 6-lite SDL glass (see photo "19 montgomery\_front right elev 2" for 2 new side doors). For all rear elevation changes, see "19 montgomery prop rear elev". At basement/ground level, the rear garage door will be replaced with a wood-framed wall with 2 new aluminum-clad windows: the other 3 windows at rear, under the new screen porch, will be replaced with aluminum-clad windows. A small shed addition adjacent to the garage will be restored with a new steel door. In remainder of the basement, at left side (3 windows) and in rear (3 windows), new aluminum-clad windows will replace the existing dilapidated wood windows. Egress window with window well will replace window at left side, front (see "proposed basement window" photo submitted with application); for view of remaining 2 left side rear windows, see "19 montgomery prop left side rear". See "Proposed Basement & 1<sup>st</sup> Floor Plans" for extent of existing and new windows and doors.
- c. **Parking Pad:** A new gravel parking pad with pressure-treated wood edging will be installed at front of house.
- d. <u>**Roof**</u>: Via a previous HAWP, the asphalt shingles have already been replaced with new asphalt shingles.

## Additions:

- a. <u>New Screen porch</u>: A new 24'-6" wide x 16'-10" (414 sf) screen porch structure will be constructed at the rear with a wood railing around; it is set in 3'-0" on the left side at the rear and 6" inside of the existing rear addition. It will supported by 6 x 6 wood posts. It will be screened with PVC screening. It will have a shed roof set 2'-0" above and matching slope of existing shed roof. On the rear of porch, there will be a 4'-3" x 4'-3" wood stoop and stairs to grade. Porch roof will have new membrane/torch-down roofing (to match existing).
- b. <u>Re-built Side stoop</u>: A new 4'-0" x 3'-6" wood deck/ stoop with wood steps to grade, will be built on the west (right) side to replace the existing dilapidated stoop and stairs.
- c. <u>Front Porch</u>: A new painted steel railing will be added to both sides of existing concrete stairs.

**<u>NOTE</u>**: As the new architect of record for this revised HAWP application now documenting the property in its present state (after a significant number of

changes had been made), I was not privy to observe the actual existing floor plans or elevations. Many windows, and 3 of 4 doors, had already been replaced when I documented the site; all of the new interior wall framing is also in place. Therefore, I am not able to provide existing plans and elevations. In their stead, I am attaching exterior photos provided by my client that show a majority of the original exterior issues; these photos are marked as "exist". The proposed exterior elevations show which windows and doors are "new" versus "existing".

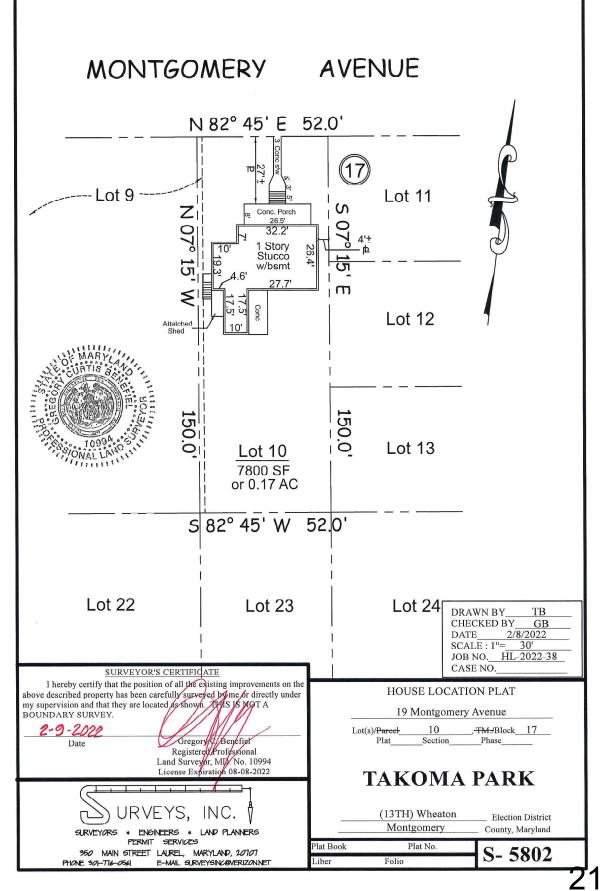


- 1. This plat is not intended for use in the establishment of property lines, but prepared for the exclusive use of the present property owners of record and/or those who purchase, mortgage or guarantee the title within six months from the date hereof and as to them i warrent this house location plat.
- 2. For title purposes only.
- No title reports furnished at this time, subject to all easements and rights of ways of record. Property corners have not been set with this survey. Property information was taken from the best available records.
- This location plat is not to be used for the construction of fences or other improvements. A boundary Survey and lot stakeout would have to be performed to determine

the location of all property lines as shown.6. The Property shown hereon is located within Zone



7. This plat is valid within 6 months of date of signature.



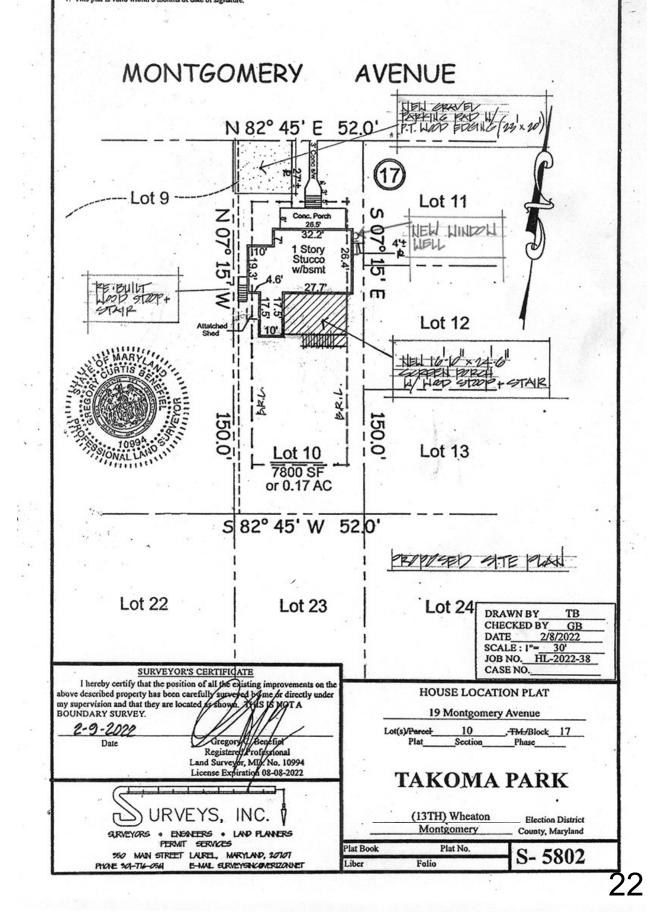


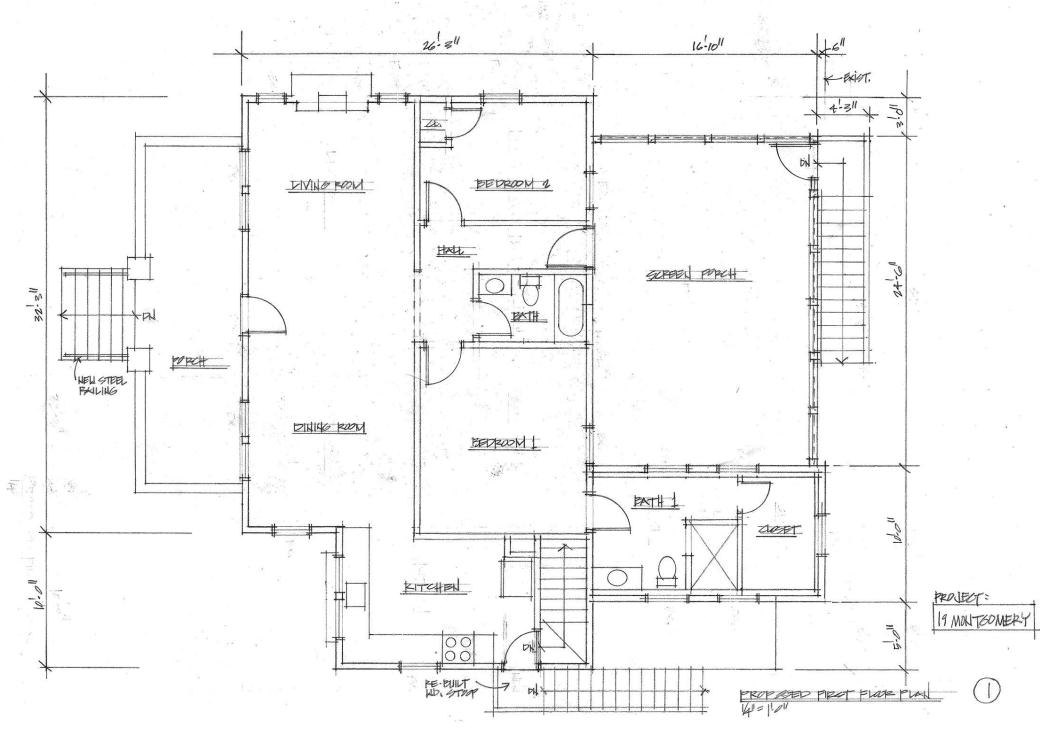
This plat is not intended for use in the establishment of property lines, but prepared for the exclusive use of the present property owners of record and/or those who purchase, mortgage or guarantee the title within six months from the date bereof and as to them i warrent this house location plat.

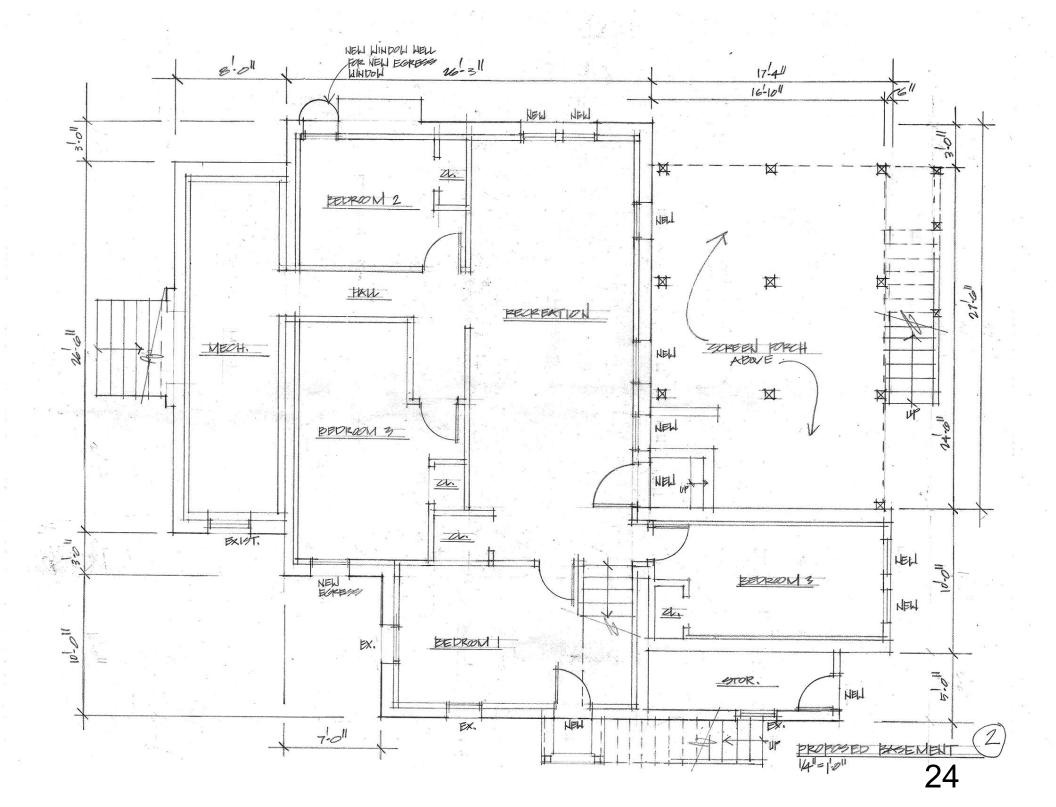
For title purposes only.

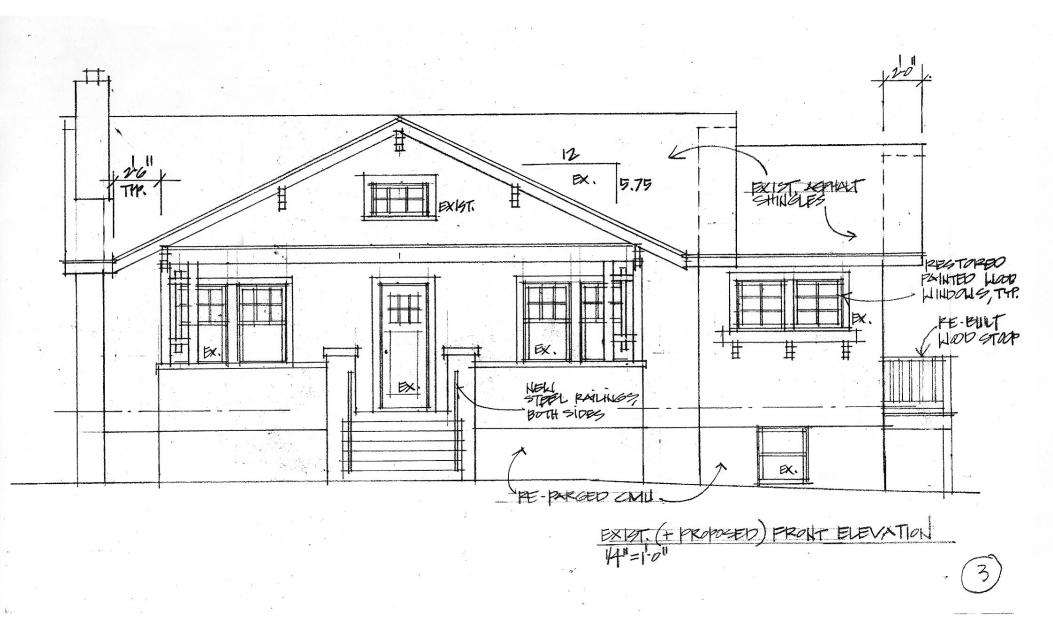
- 3. No title reports furnished at this time, subject to all easements and rights of ways of record.
- Property corners have not been set with this survey. Property information was taken from the best available records.
   This location plat is not to be used for the construction of fences or other improvements. A boundary Survey and lot a
- 5. This location plat is not to be used for the construction of fences or other improvements. A boundary Survey and lot stakeout would have to be performed to determine the location of all property lines as shown.
  6. The Property shown hereon is located within Zone\_\_\_\_\_ as shown on FEMA Lood insurance Rate Map Community Panel No.
  of

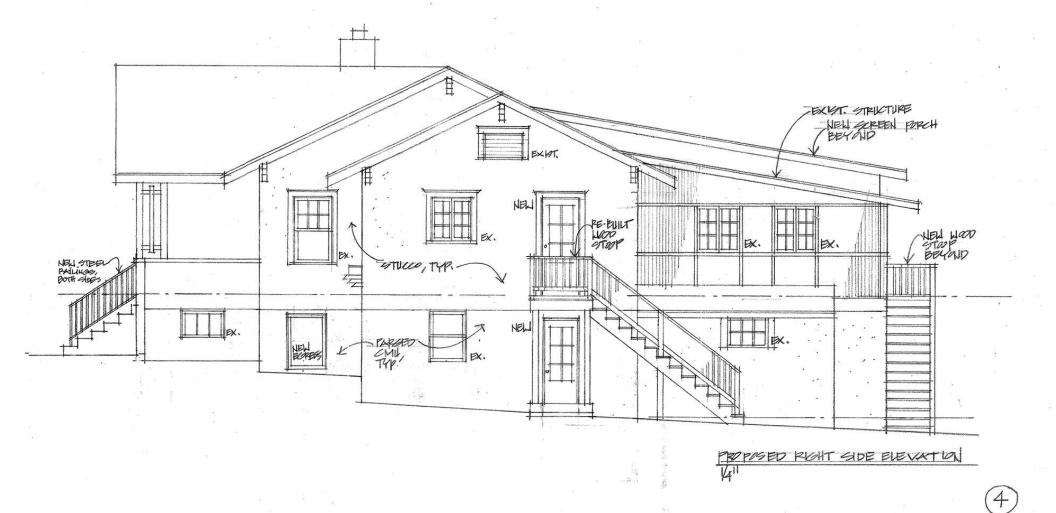
This plat is valid within 6 months of date of signature.

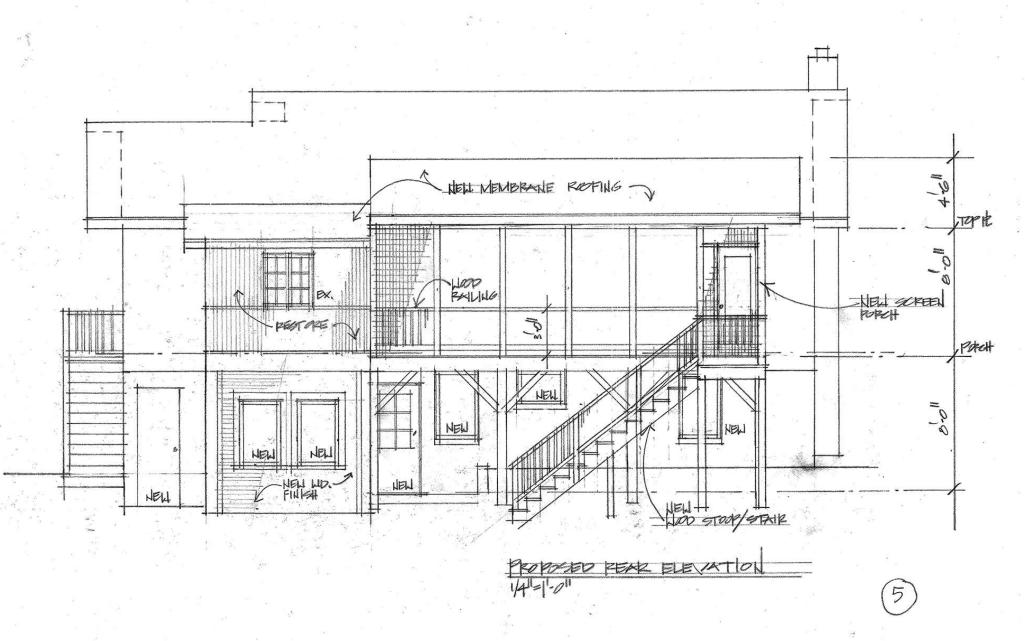


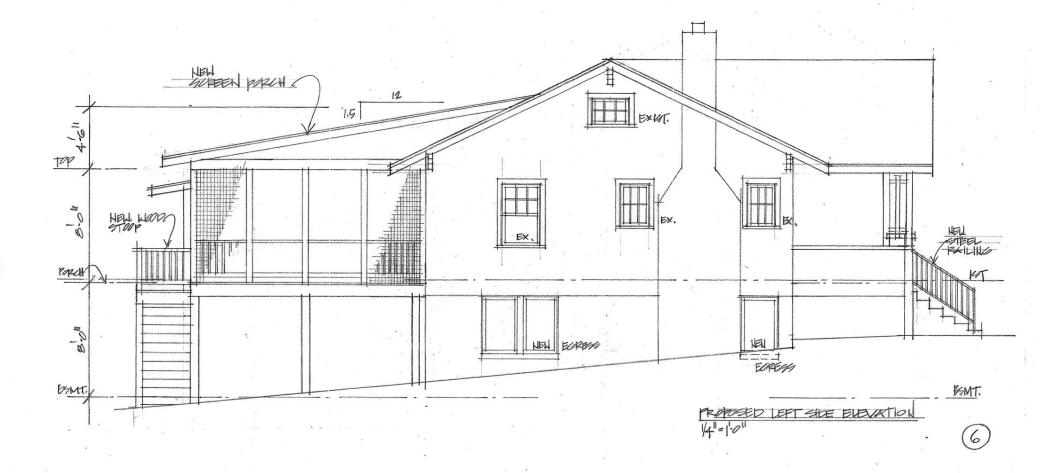






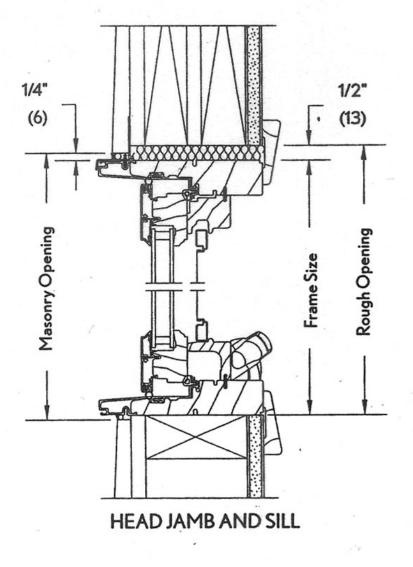


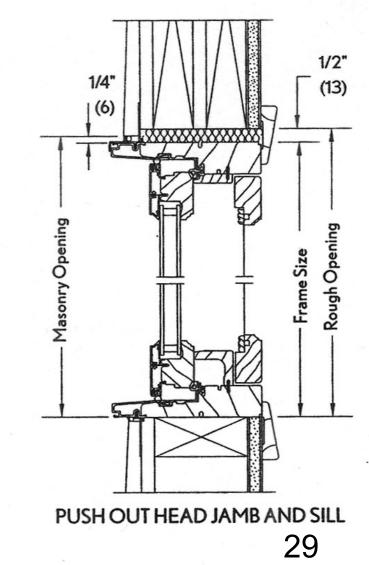




# CLAD ULTIMATE CASEMENT/PUSH OUT CASEMENT

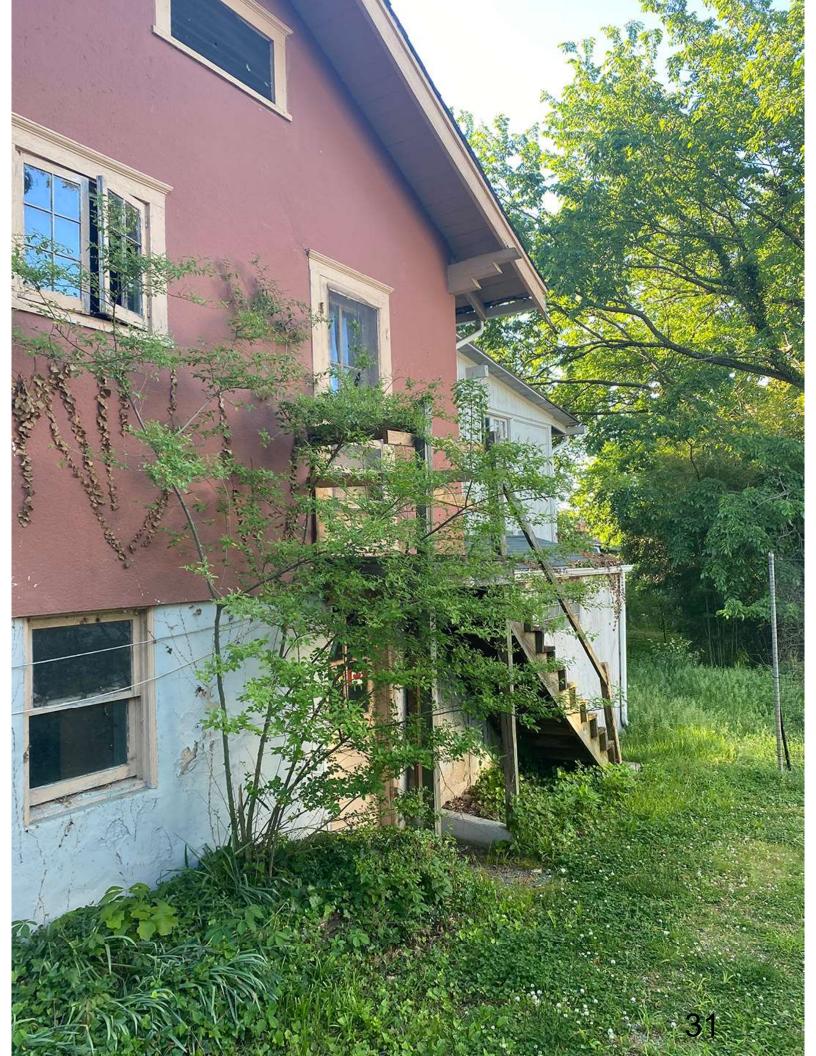
## CONSTRUCTION DETAILS





1420 51 RAL 1/2"×1/2"STU. PAUVSTEPS @ 41/2"0. C. 3:01 TOM RAIL 1 + 1 0, TV. POST (2 5-01) 0.C. MAX. 70 D 1.4 PAIL DETAIL "-" = ال

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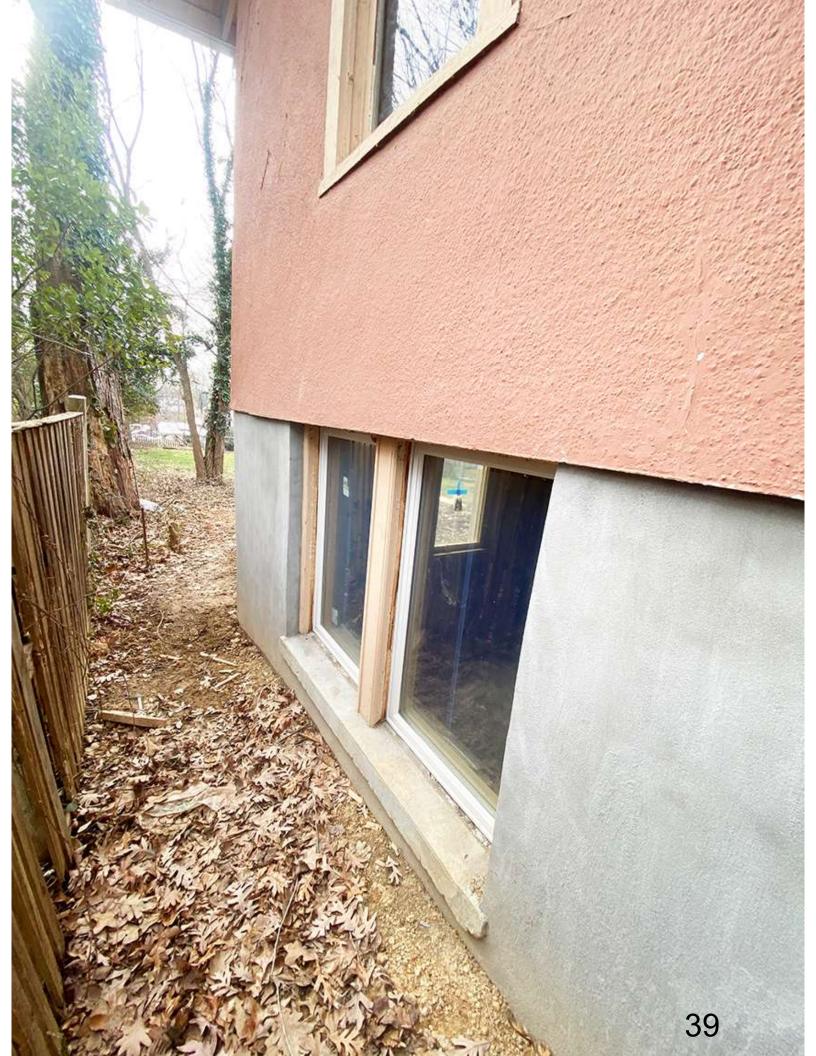












## Staff's December 2021 Site Visit Photographs

































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