



Community Development Department
 Building | Planning | Code Enforcement
 P.O. Box 9, 230 Davidson Avenue
 (360) 225-7299, www.ci.woodland.wa.us

Staff Report

Logan's Landing Appeal

Land Use Application Nos.:	SPR 22-001 (Site Plan Review), CAP 22-001 (Critical Areas Permit), SEP 22-003 (SEPA Checklist) Now: WLD-2023-006
Applicant & Property Owner:	Belmont-Lewis Holdings, LLC Attn. Shayne Olsen PO Box 1940 Bend, Oregon 97709
Additional Representative:	Wyndham Enterprises, LLC Attn. Ed and Judy Greer 13023 NE Hwy 99, STE 7-126 Vancouver, WA 98686
Site Location:	Franklin Loop off of Belmont Loop in Woodland, WA 98674.
Parcel No. & Size:	50680023, 50729, and 50730. Parcel 50714 will also be impacted. Approximately 20 acres.
Zoning Designation:	Highway Commercial (C-2), Light Industrial (I-1)
Notice of Complete Application Issued:	Last submittal on August 22 nd , 2023
Notice of Application & Likely DNS issued:	NOA issued September 6, 2023
Comment Period & SEPA Appeal Period Ended:	Published September 13, 2023 Comments due September 27 th , 2023 for SEPA
Staff Report Issued:	December 21, 2023
Date of appeal:	December 28, 2023

I. RESPONSE TO APPEAL ISSUES

APPEAL ISSUE #1 – Interpretation of whether ground floor parking is a commercial use.

Staff Response:

I. Commercial parking versus parking for commercial uses.

Staff and the applicant's consultants have agreed to disagree on this issue since the preapplication conference. Staff's logic is laid out in the staff report starting with Finding 20.

In the C-1 zoning, WMC 17.32.020(37) "Public and Private off-street parking facilities" are a permitted use. Staff has been consistent in stating that there is a difference between a "commercial parking facility" and parking that is required by code.

Required parking is a development standard. Required parking is NOT a mandate that a developer provide a use (i.e. a parking facility). The code requires parking because it mitigates for the impact of the development and provides a standard by which the city can find a development meet its own needs or demands.

If the city were to agree with the applicant's interpretation, the city would be in the position of dictating that developers use their property in a specific way and for a specific use. Staff does not have the authority to mandate a property be used for a specific use. In this case, we cannot force a developer to develop their property as a parking facility. And if we had the authority, any project which added parking, would also have to be treated as a change in use.

For example, if staff received an application for a fast-food restaurant site plan, using the applicant's interpretation, by requiring on-site parking, staff would in fact be conditioning the developer to build two uses: A) a fast-food restaurant, and B) a commercial parking facility. By logical extension, staff would have to calculate impact fees based on the size of the restaurant building AND the size of the parking structure. (Because the parking is a separate use?)

There is a difference between a USE and a physical development standard. Physical standards apply to a variety of uses independent of that use.

II. Residential above a commercial use.

If required parking is not considered a commercial use, then the buildings as designed would only be able to have residential uses at either end of the building because there is only "commercial" space at either end of the structure.

Instead of making the change as requested when this issue was raised upon the first application submittal, and the applicant revised their buildings plans to go from 972

square feet of commercial space per building (see Attachment A) to the current proposal of 5,080 square feet of commercial space (see Attachment B). While this may not be a de facto admission of staff's argument, it appears to recognize the argument because there was also a corresponding reduction of parking spaces from approximately 38 parking spaces to 21 parking spaces. But there is presumably still residential development above the parking spaces, not just the commercial use space.

The revised plans also went from three-stories of residential use, to two-stories of residential use. Presumably because there was not enough parking on the site to accommodate parking for commercial spaces in the building.

It appears that the only way to add space in the building for commercial uses (in the commercial zone), was to eliminate residential units and thus free up the residential parking spaces intended for those units. This would seem to be supported by the fact that there is virtually no change between the first site plan design, and the second site plan design. In my opinion, that shows that the design was intended for a residential apartment building and that they had to modify the building plans simply to accommodate commercial uses to make it look like a mixed-use in the commercial zone.

At best, the project is a tortured interpretation of the downtown Central Business (C-1) zoning district standard which was intended for the downtown core to have street level commercial uses with apartments above.

As the applicant points out, during the two years this project has been marking time, the code has changed. The city council considered whether the applicant's interpretation or the staff's interpretation was what is intended by code, and the council clearly sides with staff. So much so, that they rejected the staff's proposed mixed-use code language, and instead backtracked and eliminated ALL residential uses in the C-2 zone.

III. Parking as a commercial use.

As noted in Finding 25, the applicant can apply to build a commercial parking facility, but those parking spaces would not be available to count as required parking spaces under WMC 17.56.

The applicant would essentially have to provide three parking calculations. One for how many spaces are required for the commercial space; one for how many spaces are needed for the residential unit count; and one for the parking use (which I presume would be zero required parking spaces, or maybe one required space for an on-site attendant). (Finding #27) There is no clear narrative addressing the attribution of parking spaces or the location of those spaces by use for the entire site. (The revised ground floor plan (Attachment B) does show a per building parking summary, but there is no site wide or clearly phased parking plan for the project that would allow us to draw conclusions prior to final site plan and final engineering.)

Staff has to concludes that the applicant is counting on using the in-building parking to provide spaces for commercial uses. (Possibly making them commercial parking spaces as opposed to a commercial parking facility? Otherwise, the residential parking on the bottom floor wouldn't meet the "residential above a commercial use" standard.)

The problem with that is the ADA spaces are clearly positioned to provide access to the residential elevators and not for the commercial spaces. In fact, the applicant points out that the plaza entries to the commercial uses are at the outside corners of the building. If the internal parking spaces could be restricted to serve the commercial uses, the entrances to the commercial spaces would enter internally to the garage and not outwards at the remotest corners of building, far from the ADA spaces. The design isn't conducive to ADA access to any of the commercial space.

This clearly seems to imply that the in-building parking is intended to serve as private parking for residential use. And again, if it's residential parking, it can't be considered as a "commercial use" and therefore can't have residential above it. (Finding #28)

There is barely enough site plan information to clearly identify the entries of the commercial spaces. And if you can identify them, it's hard to even evaluate whether there are adequate ADA spaces that meet the standards for the commercial uses. Again, the site plan appears to locate all the ADA spaces where they can best access the residential elevator. Another design consideration that implies the building will be for all practical purposes a residential building and not commercial.

IV. Viable commercial space or just empty space to build residences above?

Staff's primary concern is that the applicant is setting up the site to have full residential occupancy, but no practical commercial spaces. (Thus, the leap from 900 sq. ft. to 5,000 sq. ft. in commercial space per building.) Staff also had to add conditions asking for clear identification for entrance plazas and for how the building will meet the commercial entry treatment standards. (To be discussed below.)

Such a residential development with no commercial activity wouldn't meet the city's goals and policies. (The main reason why staff had issued a Determination of Significance for the original submittal.)

Without the interpretation staff uses, the original site plan and building design would meet the applicant's definition, and the applicant could in fact eliminate the commercial use altogether based on the idea that because they are going to operate the apartment as a commercial business, therefore the building itself is commercial above commercial.

They also try to mitigate this effect by projecting that a large number of the apartments will be used by people working from home or operating home occupations. Staff has to presume that it justifies calling them "commercial activity" above commercial uses in a commercial zone.

You could even argue that the property is at a higher elevation than Davidson Avenue, which is in the C-1 Central Business district. Therefore, by definition, the project site is “located above a permissible C-1 commercial use”.

Not to mention that WMC 17.36.020(10) actually says:

10. Dwelling units; provided residential uses are located above a permissible C-1 commercial use and adequate off-street parking is provided pursuant to chapter 17.56. Lobbies for residential uses on upper floors may be located on the ground floor.;

By strict interpretation, it says that only “lobbies” can be located on the ground floor. It does not say that parking for the residential units can be located on the ground floor.

Conclusion:

The purpose of the zoning code is laid out in WMC 17.04.040 and WMC 17.04.070 and provides guidance for interpreting the code. The authority to administer the zoning code is laid out in code and that duty has been assigned to myself as the Community Development Director. So, deference has to be given to staff. The responsibility for interpreting code is not delegated to applicants, generally because those interpretation could tend to be in their self-interest as opposed to the public’s interest.

The appellant argues that there is no interpretation necessary when reading the parts of the code that supports their position yet they at the same time argue that staff has no authority to impose certain conditions that support staff’s interpretation, specifically, the second sentence of Condition #12.

This would only be true if the Examiner finds that the staff’s interpretation has no merit and that the applicant’s interpretation of the code is the only one with merit and fully meets the zoning code’s purpose of protecting the public health, safety, morals, and general welfare.

Staff points out that the city council, in the time since this application was submitted, has in fact considered this very issue and found the argument to not only be lacking, but wrong to the point that code had to be amended to eliminate the very possibility of having residential units in the C-2 zone because they deemed it to be inconsistent with the public’s welfare.

Therefore, staff finds it difficult to imagine a scenario where the examiner can find it is in the public’s interest to ignore staff and the council’s interpretation, and find that the merit lies with the applicant’s interpretation.

Staff recommends that the Examiner uphold the decision in regards to this project and Appeal Issue #1.

APPEAL ISSUE #2 – Interpretation of architectural façade standards.

Staff Response:

Assuming that the parking is allowed to stay on the ground floor...

I. Architectural and Site Design Standards (Starting at finding 38)

The architectural and site design standards in WMC 17.36.130 are intended to produce development that emphasizes buildings and landscaping rather than parking lots, driveways, or signs.

The proposal includes 18% clear vision glass, and a large portion of opening (42% by the appeal letter's calculation) to the street. However, the intent is not to ensure that there is adequate vision into the parking lot, the actual intent is the opposite. It would serve to provide more than twice the view into a parking facility lot as it would the commercial space itself.

That is not conducive to creating a lively commercial experience nor will it provide a pedestrian friendly experience.

II. Transparency

The transparency standards in (H) are intended *“to reduce the apparent bulk of buildings over twenty feet in height or width and maintain pedestrian scale”* and, *“to create a unifying concept through composition of building’s larger masses and elements”* (WMC 17.36.130(H)).

Simply putting holes in the building so that pedestrians and commercial shoppers can have a view into a concrete colored, artificially lit parking garage cannot be reasonably found to meet the intent of the adopted architectural standards.

In addition, under the Location of Parking Lots code (WMC 17.36.130(L)), the code includes an intent to locate parking lots behind or beside buildings in a way that ensures parking lots would be as visually unobtrusive as possible. This is to ensure that there is a contiguous and active pedestrian realm along the street.

The argument that the proposal meets the “visibility” standard in (H) does so by providing visual corridors into the parking garage. Which by definition, acknowledges that they meet (H) by making the parking more obtrusive.

III. This leads to the staff’s position that the bottom floor cannot be parking and what it means to the façade issue.

Assuming that the parking is NOT allowed to stay on the ground floor...

The introduction of ground floor commercial uses will make a substantial difference to the design, which is why there are conditions related to the submittal of revised designs and building elevations with the final engineering plans and final site plans. As part of

this process, staff will need to fully re-review the revised submittals for compliance with virtually all of the architectural and site design standards.

Commercial spaces commonly have more than 30% vision glass and break up the building façade with entryway treatments, plazas, ground-level architectural treatments, canopies, etc., as required by WMC 17.36.130. Staff has argued all along that when the ground floor is properly designed as commercial space, the revised elevations will

Conclusion:

Whether the ground floor is allowed to have parking or not, the final site plans and building elevations will need to meet the architectural standards laid out in WMC 17.36.130.

Staff attached numerous conditions of approval clarifying that the final site plan and final engineering plans would need to contain additional information in order for staff to approve the final plans. These conditions were added partially because the submitted plans provided minimal information to make the determination as part of the preliminary review. They were also necessary because the applicant's proposal did not include modifications or updates in response to the staff's comments throughout the process. An example of this can be seen by the fact that the original site plan and the revised site plan are virtually identical, with the only real change being the floor plan of the building. (Although they did change the Franklin Loop connection to Old Pacific Highway from a gravel connection to the existing driveway, to a half street. Although the critical area report shows that there will be no impact to the wetland. So even that shows an inconsistency between their site plan and the environmental reports. Thus, the addition of Condition #8. See Appeal issue #3 below.) So, there are numerous findings and conditions which will have reverberating impact during the final engineering process.

Staff recommends that Examiner NOT find the proposal to meet WMC 17.36.130(H) as requested by the applicant. There are too many outstanding questions and issues for that finding to be made at this time.

APPEAL ISSUE #3 – Street frontage improvements.

Staff Response:

The appellant may be confused about the frontage to be completed. There is about 130-feet of Old Pacific Highway that will need to be completed when the project completes the connection of Franklin Loop to Old Pacific Highway. Because Old Pacific Highway was recently rebuilt by the city, the only improvements needed will be curb, gutter, and sidewalk, plus possibly the edge of pavement to connect the curb with the edge of the pavement. The final design for those improvements will be determined as part of the final engineering plan review process.

But the appeal letter appears to argue that there is a question about the on-site improvements from the existing end of Franklin to Old Pacific Highway.

Again, there appears to be a difference in interpretation between what the staff and applicant think. The appellant appears to assume that they are not required to provide a second access for the project to Old Pacific Highway, or they may think that a gravel access will be adequate and that they do not need to meet city street standards.

Part of this confusion is manifested in their application materials. The original site plan showed a gravel access while the revised plan shows a half-street design. For staff, the confusion comes from the fact that their site plan is to build a two building “first phase” on the north end, then they want to phase the buildings based on market demand. The obvious problem being that staff cannot properly evaluate when the street will be built, let alone being sure of when each phase will occur, hence the conditions.

Staff has been clear that there needs to be a city street that connects Old Pacific Highway to the stub of Franklin off of Belmont Loop. This connection is identified in the city’s transportation improvement plan although it is not in the 6-year funding plan. Regardless, the act of developing the property will trigger the need for emergency vehicle access as well as city street improvements.

The fact that the applicant disagrees with staff that a street is needed, does not mean that they can call the property “undeveloped.” The critical area report also says there will be no impacts to the wetland on Parcel #50714, but it would appear that is only because the applicant does not believe that improvements will be needed on the parcel. By definition, the development of even a fire access, let alone a full city street, will be development. Therefore, the proposal will develop Parcel #50714 because the proposed site plan already proposes impacts to the wetland on #50714, which means the submitted critical area report does not adequately consider the impacts of the proposal. Either they were cutting corners on the application materials, or their consultant doesn’t recognize that there will be impacts to the wetland. Either way, the existing report is inadequate and needs to be revised.

Staff is already way out on a limb by approving the proposal, even with Condition #8, because it postpones the true review of the environmental impacts to the wetland until final site plan and final engineering review. Staff only did this because they believe that the impacts from the public street can be mitigated prior to final occupancy of the building. The applicant’s consultants just need to do the work to analyze the impacts and develop a mitigation plan that meets the city’s critical area code.

The idea that the applicant thinks they can do the development without meeting the city’s street codes is flawed. The fact that they can revise their final site plan to meet city code is however, possible. Therefore, rather than denying the application based

upon the applicant not wanting to provide access, staff instead added conditions of approval allowing the applicant to proceed to the final engineering stage where they can either amend their plan to meet code, or not.

The fact that they can meet code but don't feel they need to, is not a code problem. It's a design problem.

The other conclusion would be that either they do not plan to continue past the first phase of this development and there will never been anything more than a gravel driveway, OR, they do not plan to build on parcel #50714, so the road will never have to be built. (Justifying the definition of on-street improvements.)

Both are real possibilities and will significantly prevent the city from either getting needed circulation improvements, or meeting the goals and policies of the comprehensive plan.

The city cannot accept that the development of a city street on a four-parcel site plan constitutes "off-site" improvements.

If this were a subdivision, an applicant would not propose stopping the street improvements short of connecting to adjacent streets stubbed to the site for cross circulation.

The fact that the consultant modified the original submittal to include a half-street design, shows a de facto acceptance that the project needs a city street to be viable.

Should the decision be made to uphold the staff's interpretation about having commercial uses on the bottom floor, staff points out that Buildings A & B in the first phase alone, will have approximately 14,000 square feet of commercial space, PLUS 34 residential units per building, for a total of approximately 28,000 square feet, and 68 residential units.

There is no realistic way that the applicant can justify building that much commercial space on a site with a single access point, let alone adding what would be a large residential development on top of that kind of commercial development.

While their Traffic Impact Analysis (TIA) ignored our advice to look at a full commercial ground floor build-out, it does clearly look at PM Peak Hour turning movement from the extension of Franklin (Figure 4 on Page 13). On it's face, that seems to negate the argument that the street is not needed.

Conclusion:

Staff recommends that the Examiner uphold the findings and conditions and require that the project build the public improvements required by the staff decision.

In the event the examiner needs more information to make this call, at a minimum staff would request that the applicant be required to update the TIA, the critical area report, the preliminary site plan, and the SEPA checklist, so that staff could reevaluate the impacts of the development, prior to the Examiner ruling on the appeal.

APPEAL ISSUE #4 – Duplicative Signing & Striping Plan

Staff Response:

The appellant has raised the issue of signing and striping for pedestrian circulation. Staff notes that there is an error in the notice of decision Finding 43. This finding, cited by the appellant, refers to Condition 32.e but should also refer to Condition 32.f.

Condition 32 requires the submittal of a revised site plan to be submitted as part of the final engineering process, with sufficient detail to show the project meets the Architectural and Site Design Standards in WMC 17.36.130.

Condition 32.e says, “Building elevations and site plan details showing and how each building will meet the ‘Curb Cuts and Driveways’ section (K)” while f says, “Building elevations and site plan details showing and how each building will meet the ‘Pedestrian & Bicyclist Connections’ section (M).”

The intention of this condition is to ensure that there is sufficient detail in the final site plan so that staff can ensure that there is adequate detail to ensure that there is pedestrian (including ADA access) from the parking areas to the buildings.

For example, sidewalks are typically separated from streets and parking lots by curbs and gutters. Commercial structures are typically built at grade with parking tire-stops and bollards to separate pedestrian areas from parking and drive isles. Commercial access allows ADA compliant entry to the business establishment with virtually no separation between the parking lot and the business. Meanwhile typical residential developments have parking areas that are physically separated from structure. There are ADA parking spaces but no indication of whether there is an ADA ramp or at grade access to the building.

In this case, the commercial/residential character of the building blurs the line between how the building will function. There is insufficient detail in the site plan to show whether there will be a grade separation between the parking and the commercial establishments on the first floor, and the majority of the parking which can/could function as a parking lot for the apartments. (Related to the discussions above and how the ground floor will be occupied and interact with pedestrian traffic and parking.)

Conclusion:

Whether the conditions require a separate “signing and striping plan” could be subject to debate. Staff is willing to consider the revised site plan and the accompanying final engineering plans as adequate in lieu of a specific striping and circulation plan if the final site plan and final engineering plans provide the detail needed to show that there will be adequate circulation for pedestrians and bikes.

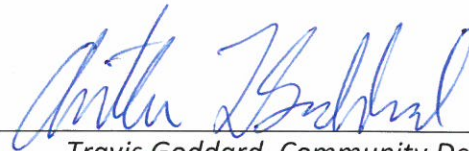
II. RECOMMENDATION

Per WMC 19.08.030, staff is responsible for providing a staff report and recommendation to the examiner. Staff recommends the Examiner uphold the **APPROVAL WITH CONDITIONS** issued by the City of Woodland on December 21st, 2023.

Staff Contact: Travis Goddard, Community Development Director
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P.O. Box 9
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Woodland, WA 98661
goddardt@ci.woodland.wa.us

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Signature:



Travis Goddard, Community Development Director

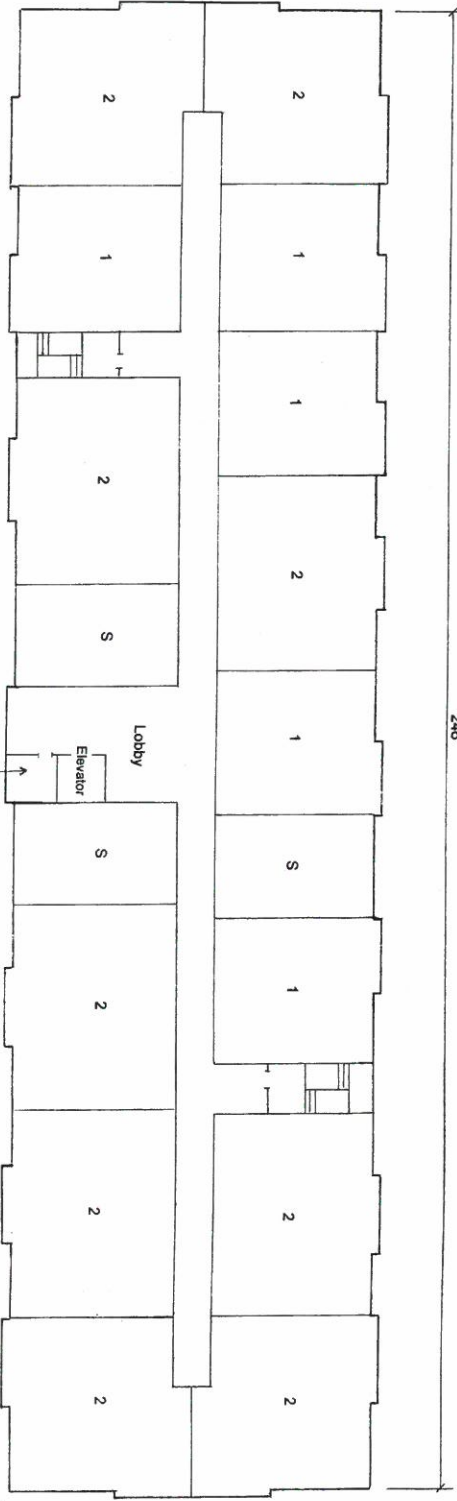
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|-----------------------------------|---------------------|
| Applicant | Planning Commission |
| Property Owner | City Council |
| Ryan Walters, P.E., Gibbs & Olson | Mayor |
| Parties of Record | File |
| Department Heads | Counter Copy |
| Building Official | Website |
| Fire Marshal | |

ATTACHMENTS

- A. Floor Plan (First Submission Attachment A)
- B. Floor Plan (Revised Submittal – Ground Level Floor Plan)
- C. Site Plan (First Submission – Document #27) (4 pages)
- D. Site Plan (Revised submittal – Preliminary Site Plan)

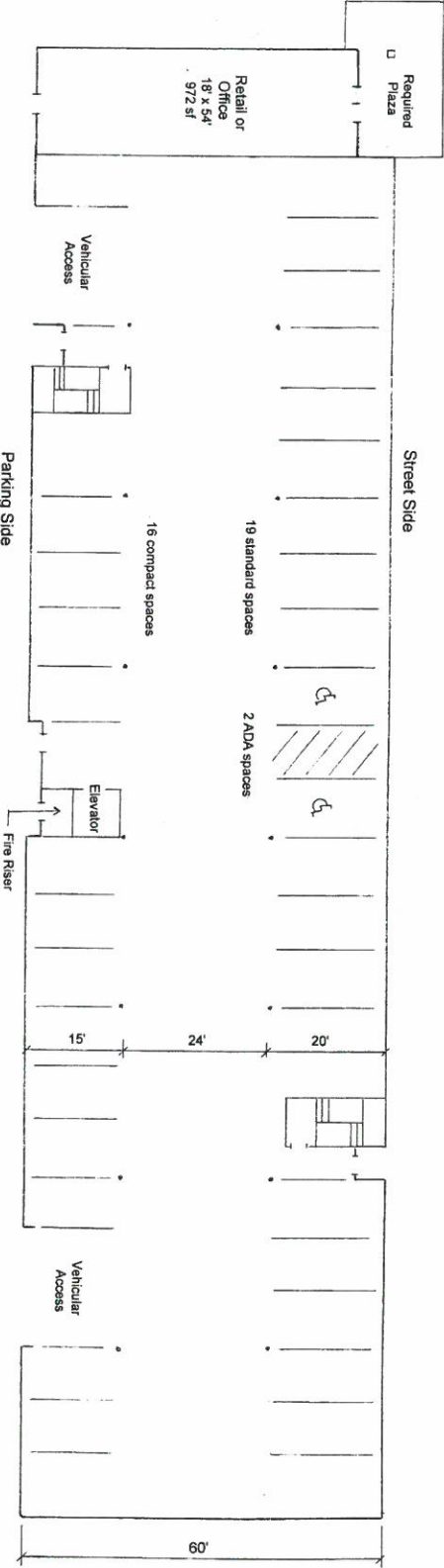
246'



Unit Mix

Each Floor	Total
Studio	9
1 Bedroom	15
2 Bedroom	27
Total	51

Plan for Upper Floors



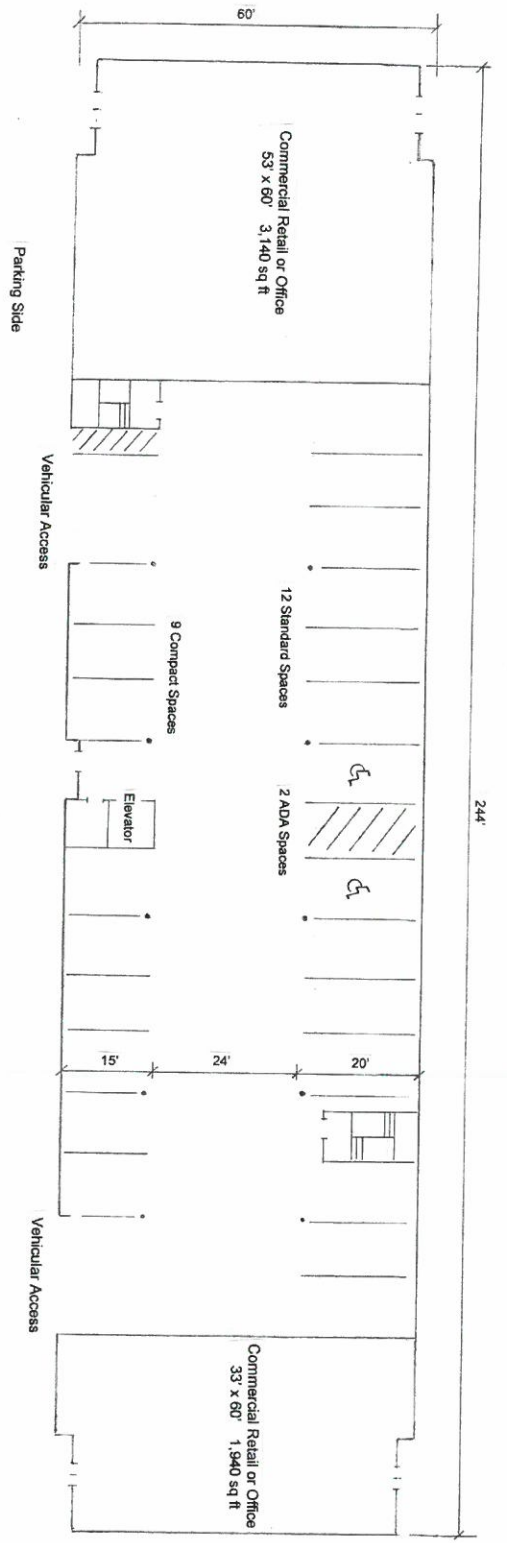
Plan for Ground Floor



B

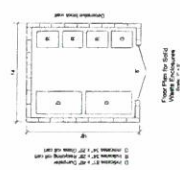
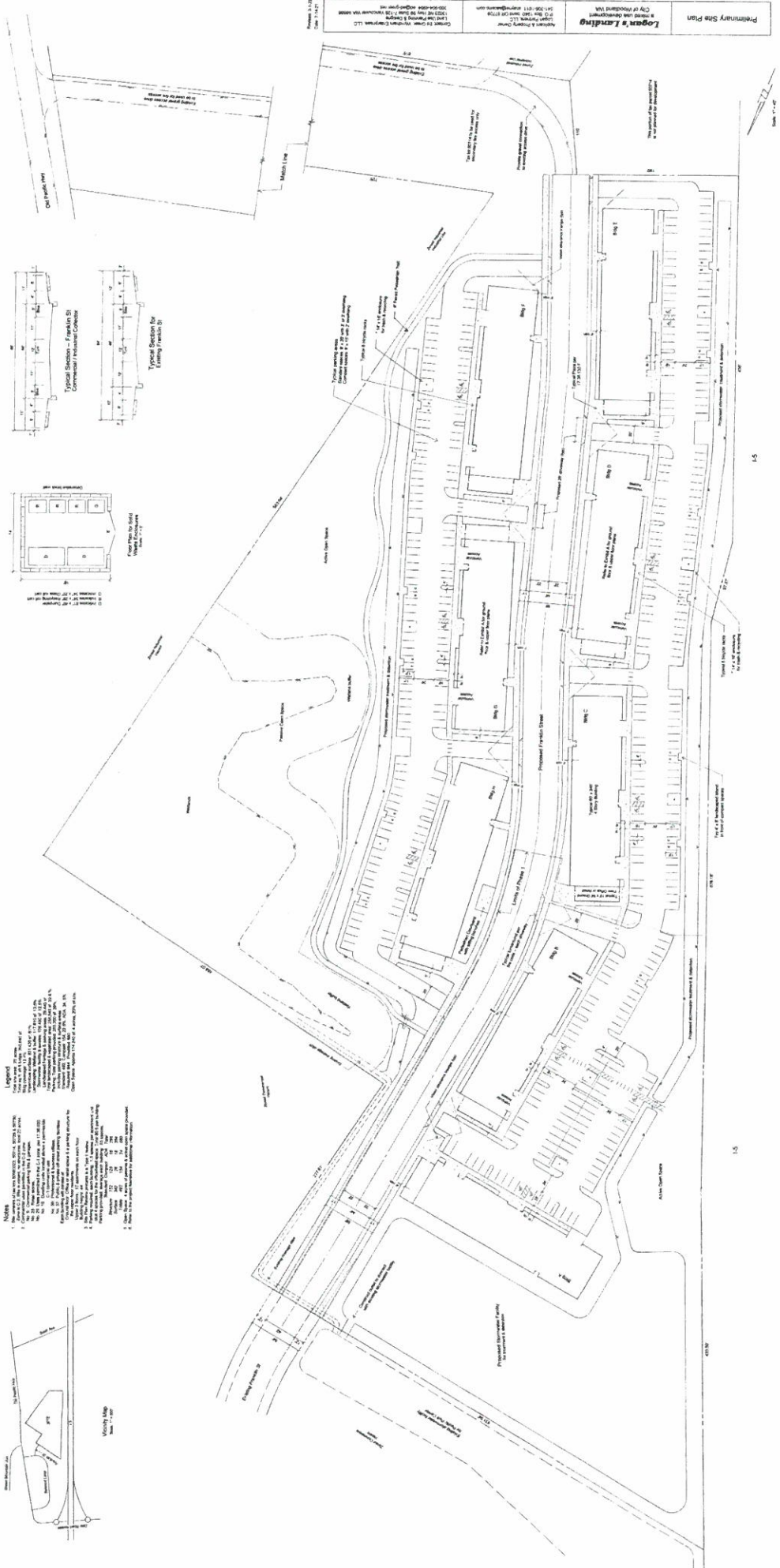
Summary per Building
5,080 sq ft of Commercial Space requires 17 parking spaces
34 Second & third floor Residential Units requires 51 parking spaces
Total Required = 68 parking spaces Total provided = 70

Parking provided:
Ground floor parking: Surface parking: Totals
12 Standard 43 Standard 55
9 Compact 2 Compact 11 (15.7%)
2 ADA 2 ADA 4



Date: 4-12-23

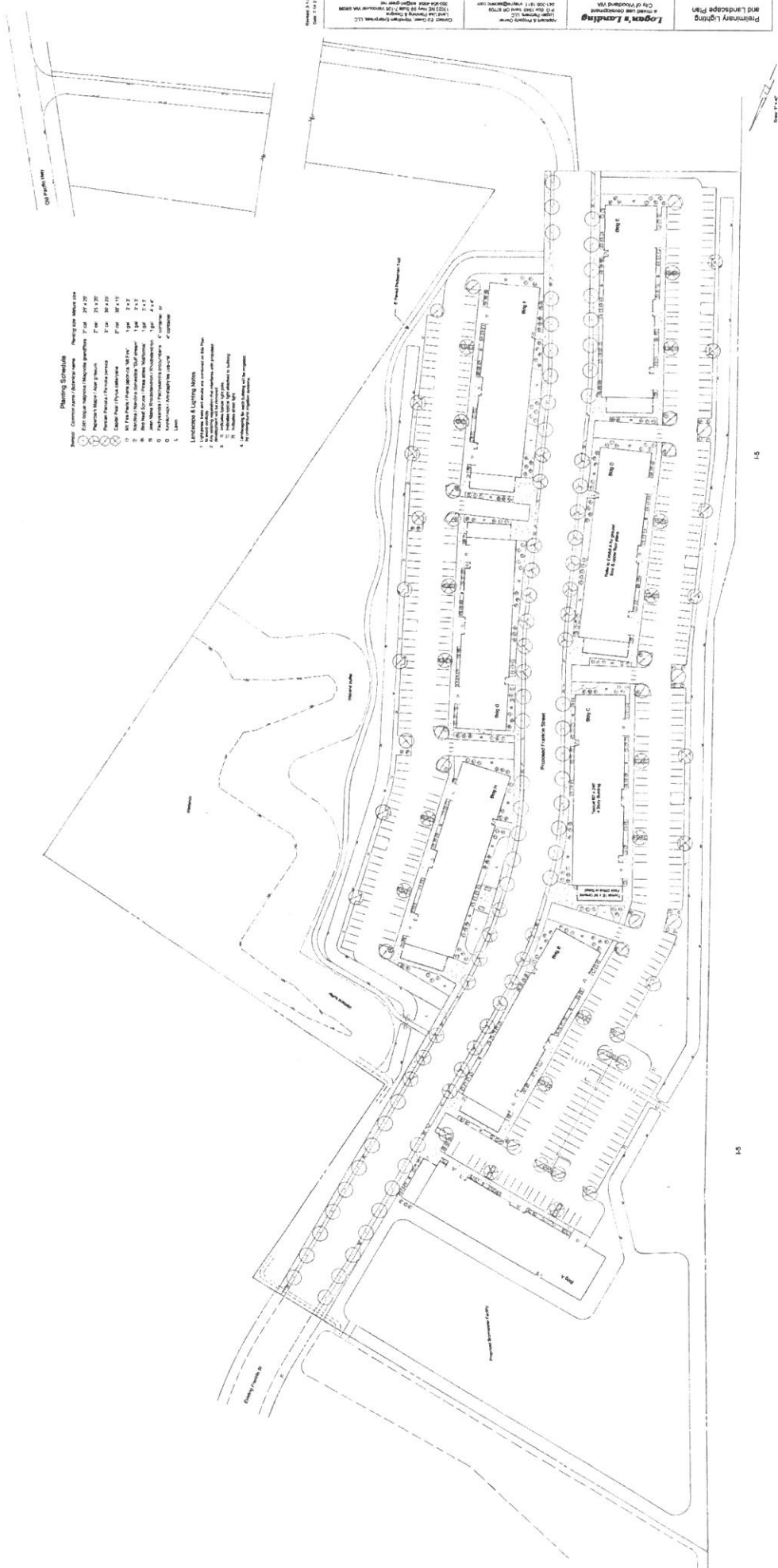
Logan's Landing
Revised Ground Floor Plan



- NOTES:**
1. The owner shall provide all necessary permits and approvals for this project.
 2. The contractor shall be responsible for obtaining all necessary permits and approvals for this project.
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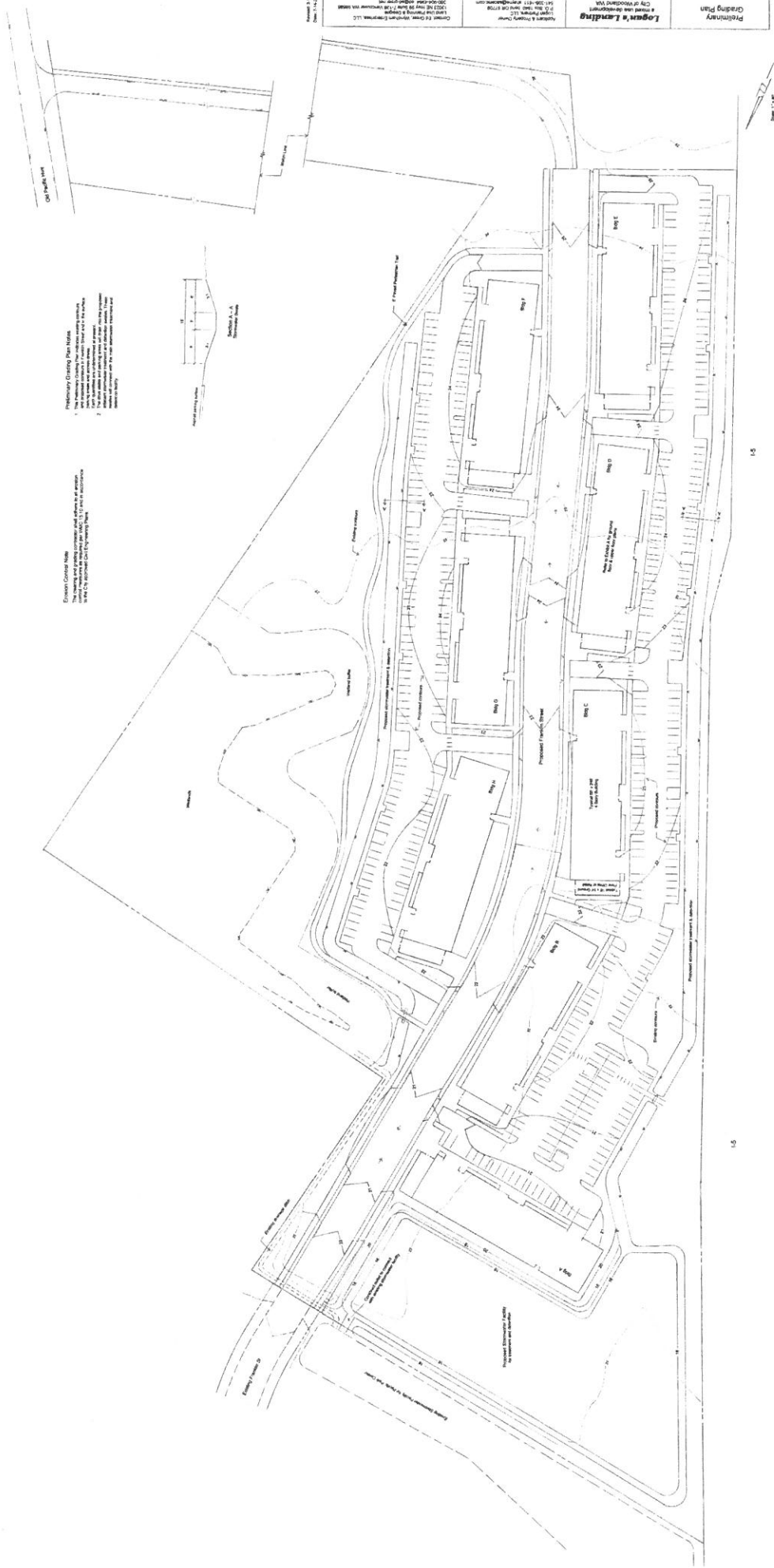


Planting Schedule

Code	Common Name / Scientific Name	Planting Size / Notes
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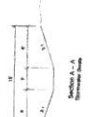
Lighting & Lighting Notes

1. All lighting fixtures are to be installed in the Plan.
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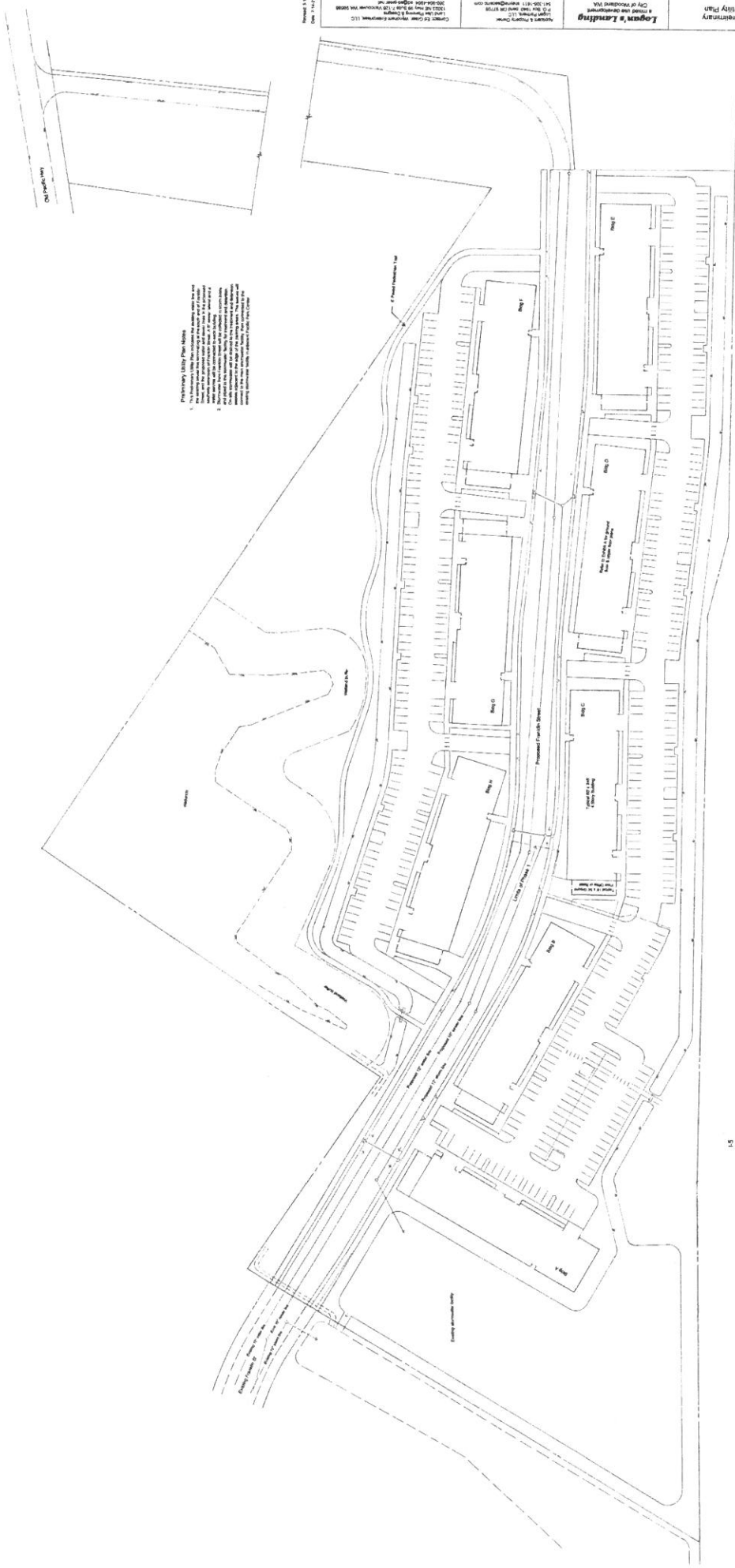


Preliminary Grading Plan Note
1. This preliminary grading plan is for informational purposes only and is not intended to be used for construction. It is subject to change without notice.
2. The proposed grading is based on the existing ground conditions and does not take into account any future construction or other factors that may affect the grading.
3. The proposed grading is based on the existing ground conditions and does not take into account any future construction or other factors that may affect the grading.

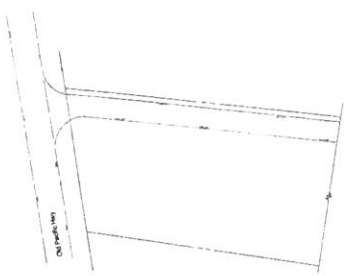
Erosion Control Note
1. The proposed erosion control measures are based on the existing ground conditions and do not take into account any future construction or other factors that may affect the erosion control.
2. The proposed erosion control measures are based on the existing ground conditions and do not take into account any future construction or other factors that may affect the erosion control.



City of Woodbury



Proposed Utility Plan Notes:
1. The utility plan is based on the information provided by the applicant and is subject to change based on field conditions.
2. The utility plan is not a guarantee of the location or depth of any utility lines.
3. The utility plan is not a guarantee of the accuracy of any utility line data.
4. The utility plan is not a guarantee of the accuracy of any utility line data.
5. The utility plan is not a guarantee of the accuracy of any utility line data.
6. The utility plan is not a guarantee of the accuracy of any utility line data.
7. The utility plan is not a guarantee of the accuracy of any utility line data.
8. The utility plan is not a guarantee of the accuracy of any utility line data.
9. The utility plan is not a guarantee of the accuracy of any utility line data.
10. The utility plan is not a guarantee of the accuracy of any utility line data.



- NOTES:**
1. This plan is a preliminary site plan and is subject to change without notice.
 2. The site is located in the City of Woodbury, Massachusetts, and is zoned R-1A.
 3. The site is bounded by [Faint text] to the north, [Faint text] to the south, [Faint text] to the east, and [Faint text] to the west.
 4. The site is bounded by [Faint text] to the north, [Faint text] to the south, [Faint text] to the east, and [Faint text] to the west.
 5. The site is bounded by [Faint text] to the north, [Faint text] to the south, [Faint text] to the east, and [Faint text] to the west.
 6. The site is bounded by [Faint text] to the north, [Faint text] to the south, [Faint text] to the east, and [Faint text] to the west.
 7. The site is bounded by [Faint text] to the north, [Faint text] to the south, [Faint text] to the east, and [Faint text] to the west.
 8. The site is bounded by [Faint text] to the north, [Faint text] to the south, [Faint text] to the east, and [Faint text] to the west.
 9. The site is bounded by [Faint text] to the north, [Faint text] to the south, [Faint text] to the east, and [Faint text] to the west.
 10. The site is bounded by [Faint text] to the north, [Faint text] to the south, [Faint text] to the east, and [Faint text] to the west.

- Specifications (continued)**
1. The site is bounded by [Faint text] to the north, [Faint text] to the south, [Faint text] to the east, and [Faint text] to the west.
 2. The site is bounded by [Faint text] to the north, [Faint text] to the south, [Faint text] to the east, and [Faint text] to the west.
 3. The site is bounded by [Faint text] to the north, [Faint text] to the south, [Faint text] to the east, and [Faint text] to the west.
 4. The site is bounded by [Faint text] to the north, [Faint text] to the south, [Faint text] to the east, and [Faint text] to the west.
 5. The site is bounded by [Faint text] to the north, [Faint text] to the south, [Faint text] to the east, and [Faint text] to the west.
 6. The site is bounded by [Faint text] to the north, [Faint text] to the south, [Faint text] to the east, and [Faint text] to the west.
 7. The site is bounded by [Faint text] to the north, [Faint text] to the south, [Faint text] to the east, and [Faint text] to the west.
 8. The site is bounded by [Faint text] to the north, [Faint text] to the south, [Faint text] to the east, and [Faint text] to the west.
 9. The site is bounded by [Faint text] to the north, [Faint text] to the south, [Faint text] to the east, and [Faint text] to the west.
 10. The site is bounded by [Faint text] to the north, [Faint text] to the south, [Faint text] to the east, and [Faint text] to the west.

