NICHOLAS COUNTY ALTERNATIVE PROCEDURES PILOT PROGRAM SECTION 428 AGREEMENT

This Agreement is between the Nicholas County Board of Education (NCBOE) (PA ID 067-00A15-00), The West Virginia Division of Homeland Security and Emergency Management (DHSEM) (PA ID 000-UU9A1-00), The West Virginia School Building Authority (SBA) (PA ID 000-U3C2A-00) and the Federal Emergency Management Agency, Division of Homeland Security (FEMA). The purpose of this Agreement is to fix a sum certain for all of the eligible costs and expenses expected to be funded or reimbursed by a FEMA Public Assistance Grant. NCBOE, DHSEM, and SBA agree that all eligible costs for the repairs/relocations and replacement of the flood damaged schools in Nicholas County, WV eligible for FEMA grant funds from DR-4273-WV will be included in this Agreement. FEMA will prepare a Project Worksheet for this Agreement.

We the undersigned agencies agree in accordance with Section 428 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, to accept a permanent work FEMA Grant based on a fixed estimate in the amount of \$177,513,582.00 PW number 857 (Copy attached) under Disaster DR-4273-WV. We accept responsibility for all costs above the fixed estimate.

We understand that by participating in this pilot program we will be reimbursed for allowable costs in accordance with 2 CFR § 200. The reimbursement will not exceed the fixed estimate. We also understand that by agreeing to this fixed estimate, we will not receive additional funding related to the facilities or sites included in the fixed grant. We also acknowledge that failure to comply with the requirements of applicable laws and regulations governing assistance provided by FEMA and the PA alternative procedures pilot program guidance (such as procurement and contracting; environmental and historic preservation compliance; and audit and financial accountability) may lead to loss of federal funding.

Signature of Nicholas County Board of Education Authorized Representative	Date
Printed Name and Title	_
Signature of Division of Homeland Security and Emergency Management Authorized Representative	Date
Printed Name and Title Signature of School Building Authority Authorized Representative	Date
Printed Name and Title	-

Signature of FEMA Authorized Representative	Date
Printed Name and Title	

This version consolidates CEF Costs for PW 842, 843, and 857 into Section 428 (PAAP for Permanent Work) and Relocation costs (PW 842, 843), NFIP compliance costs (PW 857), and 406 mitigation costs (PW 857).

BACKGROUND

Summersville, Richwood Middle Schools and Richwood High School were significantly damaged during the June 23rd, 2016 storm event in West Virginia, FEMA Dr-4273. Flooding of Brushy Fork Creek in Summersville, Cherry River in Richwood and subsequent flood water spillover to the adjoining areas inundated the above-referenced schools and caused significant damage to the facilities. Comprehensive details of the damages, associated dimensional data, technical assessments, repair or replace cost estimates to support 50% analyses are given in USACE EXECUTION OF FEMA 50% ANALYSIS, October, 2016.

Individual project worksheets (PWs) that included facility description, cost methodology, Cost Estimating Format (CEF) fact sheets were validated by USACE and updated PWs were issued as below:

- 1. Richwood High School (1961) PW 842 (v1), Aug, 2017
- 2. Richwood Middle School (1957) PW 843 (v1), Aug, 2017
- 3. Summersville Middle School (1991) PW 857 (v1), Aug 2017

Public Assistance Alternative Procedures (PAAP) PARTICIPATION

Nicholas County Board of Education (NCBOE, client) through West Virginia School Building Authority (WVSBA, sub-recipient) <u>agrees</u> to the implementation of Public Assistance Alternative Procedure for Permanent Work (Stafford Act, Title IV, Section 428, v3, 2016). The timeframe for reaching agreement under PAAP has been extended by the Alex Amparo, Assistant Administrator Recovery Directorate, through September 25, 2018. Under the alternative procedure for permanent work, the SBA and NCBOE <u>agrees</u> to:

Consolidation of multiple fixed cost estimate sub-awards

The estimates are numbered for reference in this document, as listed below:

- Richwood High School Building cost PW 842
 As a direct result of 50% analysis for Richwood HS disaster damages, the sub-award is calculated based on replacement estimate as given by the respective CEF Fact Sheet, relocation, permitting and Direct Administrative Costs (DAC).
- Richwood Middle School Building cost PW 843
 Post 50% analysis for disaster related damages to Richwood MS, the sub-award is calculated based on replacement estimate of respective CEF Fact Sheet, relocation, permitting costs and DAC.
- 3. Summersville Middle School Building cost PW 857 (cost includes CEF plus DAC less NFIP proceeds)
 - Post 50% analysis for disaster related damages to Summersville MS, the sub-award is calculated based on replacement estimate of respective CEF Fact Sheet, relocation, permitting costs and DAC.
- 4. Codes and Standards Compliances CTE Center per WV Code 18-9D-19, WV Policy 6200/2510
- 5. Codes and Standards Compliances Raising Summersville Building School footprint to BFE+2
- 6. Section 406 Hazard Mitigations Proposals
 - a. Elevation of Site Roads & Parking lots
 - b. Brushy Fork Creek Bank Stabilization
 - c. Brushy Fork Creek Flood Gauges and Monitoring
 - d. Safe Room(s)

7. Direct Administrative Costs

a. Nicholas County Board of Education has been authorized to utilize the Public Assistance Alternative Procedures for Direct Administrative Costs dated June 12, 2018 as authorized by Region 3 PA Branch Chief in accordance with HQ PA Program permission/agreement. Permission document attached.

8. Directed Relocation

a. Acquisition, Access, Utilities

Fixed Cost Estimate Sub-award in accordance with section 428, Stafford Act, 42 U.S.C. §5189f Sub-award is based on a capped funding amount and <u>includes</u>

- 1. Sub-awards 1 through 5, 7 and 8.
- 2. The sub-award 6a through 6d. 406 mitigation sub-awards are discretionary, originally meant for site elevation, creek bank stabilization, flood monitoring, and safe room(s) for Summerville MS replacement funding.

The resiliency measures Nicholas County Schools' proposed are to enhance school building and its occupants' security through technology based monitoring/surveillance, safe entrances, designing schools as shelter(s)-in-place and implementing strategies to use building as teaching tools. The measures are <u>in lieu</u> of the discretionary 406 mitigation sub-awards.

The benefits of schools relocation in addition to the proposed resiliency measures are greater than the approved mitigation scope of work (sub-awards 6a through d) for originally approved replace sub-awards.

Relocation costs to include agreed land acquisition, permits, utilities, site specific costs, etc. Refer to LIST OF ATTACHMENTS for development narrative and the estimate.

Summersville Middle School:

Additional Funding Reflecting Omitted Code Compliance:

The Base Estimate validated by the USACE Center of Excellence for Summersville Middle School did not originally include the cost to elevate the new structure to Base Flood Elevation plus two feet as required in the Summersville Floodplain Management Ordinance. The existing Summersville Middle School is located in the 100-year floodplain, specifically Zone A, as identified by the WV Flood Tool and the FEMA National Flood Hazard Layer Maps provided as Map 1.

The Base Flood Elevation (BFE) for the property where Summersville Middle School is located was determined to be 1,844' based on the high water mark established during the 2016 flooding and is considered best available data for floodplain management purposes. The original structure had a first floor elevation of 1,842' as determined by ZMM and is 2 feet below BFE. To comply with the Summersville Floodplain Management Ordinance, the structure would have to be elevated two feet above Base Flood Elevation to 1,846 feet. To comply with the elevation requirements, the new structure will be constructed on select fill material so that the first floor elevation of the new structure will be at 1,846 feet.

Codes and Standards Compliance - Raising Summersville Middle School building footprint to BFE+2

The scope is to raise the existing site above Base Flood Elevation (BFE). This complies with siting requirement of West Virginia Handbook of Planning School Facilities policy 6200 for school building to be above 100-year flood plain (126CSR172 §202.06). Corresponding estimate is as per CEF Fact Sheet.

-This sub-award is an addition to PW 857, since it will be required as part of replace cost while meeting WV codes and standards.

Summersville Middle School continued Section 406 Hazard Mitigations Assistance (HMA)

Section 406 hazard mitigation funds are discretionary funds that can be added to project funding for the repair of disaster-damaged facilities and must prevent future damage similar to that caused by the declared event. Under standard procedures, 406 mitigation funds cannot be retained on alternate projects or improved projects that involve relocation or facility replacement at the same site. In an effort to promote greater flexibility in the use of funds after accepting a fixed estimate subaward and allow more resilient mitigation with the alternative procedures authorized under Section 428, FEMA may allow the retention of 406 mitigation funds on a case-by-case basis where prevention of future similar damage is proven to be of greater or equal benefit than that which would have been achieved with the approved mitigation scope of work in the originally approved repair subaward. (PAAP, March 29, 2016, page 15)

The following 406 mitigation costs have been deemed eligible for the original Summersville Middle School and these costs are allowed for retention in the relocation projects per PAAP, March 29, 2016, page 15). As per the referenced policy actual mitigation measures items listed below (a-d) are not required to be completed; however, the costs of these items will carry-over to the relocation project as resiliency measures in lieu of the 406 mitigation measures and are of equal or greater value.

406 Mitigation Measures

a. Elevation of Site Roads & Parking lots

As part of 406 HMA, the sub-award is for work scope related to raising school access, site roads and parking lots above BFE. The scope includes installing new and salvaged storm water collection catch basins and draining lines. The estimate is per CEF Fact Sheet.

b. Brushy Fork Creek Bank Stabilization

As part of 406 HMA, the sub-award is for work scope related to 1000 feet of creek bank stabilization through slope stone armoring, and providing three (3) pre-cast concrete outfall structures and work permits. The estimate is per CEF Fact Sheet.

- c. Brushy Fork Creek Flood Gauges and Monitoring
 - As part of 406 HMA, the sub-award is for work scope related to installing flood water Gauges along the creek banks with three (3) monitoring cameras and associated data collection, processing and work permits. The estimate is per CEF Fact Sheet.
- d. Safe Room(s)

As part of 406 HMA, the sub-award is related to developing safe rooms for all school students, administration and teaching staff against known natural hazards and potential active shooter incidents. The scope allows for strategically locating safe rooms with reinforced floor, roof, walls, doors, emergency exits, sprinkler system, water faucets, restrooms, dedicated HVAC, power supply, and first-aid stations. The estimate is per CEF Fact Sheet.

The resiliency measures Nicholas County Schools' proposed are to enhance the school building and its occupants' security through technology based monitoring/surveillance, safe entrances, designing schools as

shelter(s)-in-place and implement strategies to use building as teaching tools. The measures are <u>in lieu</u> of the discretionary 406 mitigation sub-awards.

The benefits of schools relocation in addition to the proposed resiliency measures are greater than the approved mitigation scope of work (sub-awards 6a through d) for originally approved replace sub-awards.

Relocation costs to include agreed land acquisition, permits, utilities, site specific costs, etc. Refer to LIST OF ATTACHMENTS for development narrative and the estimate.

A Benefit Cost Analysis (BCA) was completed, fully supported, and found to be within acceptable ranges. (Attached)

Estimate Review and Validation from Independent Expert Panel (FEMA funded)

Base Cost Estimating Format (CEF)

At the request of the Joint Field Office, the Subject Matter Experts and Cost Engineers from the U.S. Army Corps of Engineers Huntington District backed by the USACE Cost Engineering Center of Excellence in Walla Walla, Washington performed an independent assessment of damages to the facility and estimated cost of repairs.

The USACE Cost Engineering Center of Excellence in Walla, Washington completed a validation of the CEF's for PW 842, 843, and 857 in June of 2017. Acquisition, utilities, and access were not included in the validation. In accordance with 44 CFR § 206.226(g),(2), eligible work associated with relocation includes land acquisition and construction of necessary support facilities, such as roads, parking lots, and utilities.

The SBA, NCBOE and their consultants ZMM Architects and Engineers and Skanska USA Building, Inc. have agreed that the Base Estimate is accurate as validated by the U.S. Army Corps of Engineers.

Mead & Hunt, Inc. (FEMA funded third party validation)

The Cost Estimate Validation of the NCBOE submittal dated August 2, 2018, was validated with the subsequent response to a Request for Information (RFI) submitted on August 10, 2018.

The following estimates are made available for review and validation, refer to LIST OF ATTACHMENTS

- 1. NCBOE generated estimate for Career Training Education Facility
- 2. FEMA estimates for 406 Mitigations sub-awards
- 3. FEMA estimate for elevating Summersville building site BFE+2

Use of Excess Funds (per Stafford Act, Title IV, Section 428 v3, March, 2016 and Public Assistance Alternative Procedures Pilot Program Guide for Permanent Work, (Version 3) March 29, 2016, page 13:

When the actual cost of the work under a subaward is less than the fixed estimate, the subrecipient may use the excess funds for PA Program-related purposes. The following are allowable uses:

Hazard mitigation activities that will reduce the risk of damage in future disasters. The subrecipient may use the funds for hazard mitigation on facilities not damaged in the declared disaster. However, the mitigation must be applied to facilities that would otherwise be eligible for PA Program funding. The law also states that mitigation measures must be cost-effective; the subrecipient is responsible for documenting cost-effectiveness. The criteria outlined in *FEMA Policy 104-009-2 Public Assistance Program and Policy Guide* dated January 2016, may be used for this purpose.

Activities that improve future PA Program permanent work operations, such as training and planning for future disaster recovery operations.

Unacceptable uses may include:

Payment of debts

Payment of the non-Federal share of PA Program subawards or other Federal awards Operating expenses

Cost overruns on other PA Program subawards (that are not part of the consolidated subaward) Incorporation into the community's General Fund

Restoring or replacing a facility not damaged in the declared disaster (hazard mitigation measures excepted)

Restoring or replacing a facility that would otherwise not be eligible for PA Program funding

When the subrecipient has completed the scope of work associated with a fixed estimate subaward for less than the agreed upon cost estimate, it must certify final costs and submit a request to use excess funds, through the recipient, within 90 days of project completion for final reconciliation by FEMA. As part of this request, the subrecipient must also provide information for intended use of the excess funds, to include the scope of work and project timeline. FEMA will initiate closure of the original subaward and then prepare a new subaward to document the use of the eligible excess funds and conduct all required reviews prior to obligation. As appropriate, requirements to obtain-and-maintain insurance apply to work funded with excess funds.

Special Consideration Reviews for the Improved Projects

Environmental/Historic Compliance Review – No construction may begin until the EHP reviews are completed and a release to construct has been provided by FEMA.

Insurance Review

Hazard Mitigation Review

IMPROVED PROJECTS

Nicholas County Board of Education intends to utilize the Fixed Cost sub-award to develop following two alternate projects located on two different sites about 15 miles apart:

- 1. Richwood High School and Richwood Middle School community schools will be located at the site of Cherry River Elementary School with each maintaining identity, mascots, classrooms, etc.
- 2. The New Summersville Middle School and the comprehensive Nicholas County High School with an Integrated Career Technical Education Facility (CTE) will be located at the property commonly referred to as Glade Creek site.

Site Evaluation

FEMA acknowledged receipt of **Selected Site Evaluation by Nicholas County Schools, June 19, 2018** prepared by ZMM Architects and Engineers for the alternate projects' sites.

SCOPE OF WORK

PA-03-PA-4273-PW-842 PA-03-PA-4273-PW-843 PA-03-PA-4273-PW-857 Applicant DDD, refer to prior documents

Work to be completed:

Cherry River Community School

190 Riverside Drive, Richwood, WV 26261

The existing Cherry River Elementary School located off Riverside Drive, Richwood is a one story school building with school facilities spread over approximately 7 acres. As part of one of the alternate projects an additional 2.74 acres may be acquired by eminent domain to expand the parking, school bus and vehicular loop and main entrance student drop-off. The New Richwood Middle School and Richwood High School will be accommodated within in the modified and enlarged facility. The modifications to the school will serve grades 6 through 12 in addition to the existing elementary school.

Richwood Middle School and Richwood High School will maintain respective areas of operations, administration and administrative staff in the modified Cherry River Elementary Building thereby facilitating a 21st century learning community. The exterior design to reflect community heritage with a lodge type of appearance with use of stone, wood and lumber.

The facility will have outdoor amphitheater, play and learning areas. The addition to the existing school will also include expanded parking and access to comply with fire code. The current proposed floor plan is 108,950 square feet.

The intended programmed spaces are listed below:

Gymnasium/Locker Rooms

Auditorium

Biology/Physics Lab

Core Subject Classrooms

Advanced Placement Classrooms

Special Needs Classrooms

Special Needs Life Skills Classroom

Resource Classrooms

Conference Areas

Art Classroom

Band Classroom

Administrative Areas

Restrooms

Mechanical and Support Spaces

Kitchen

Dining Areas

Outdoor Play Area

Outdoor Learning Area

Summersville Middle and the Comprehensive Nicholas County High School

With an Integrated Career Technical Education Center (CTE)

The new Summersville Middle, Nicholas County High School and CTE will be developed and built in compliance with State of West Virginia adopted codes, regulations and West Virginia Board of Education codes & policies. The new facilities will be above 100-year floodplain. The facilities' design will implement strategies, systems, features and procedures towards mitigation of hazards, facilities' security needs, technology to meet curriculum requirements, building use as teaching tools and as shelter-in-place with safe school entrances with related requirements.

The New Summersville Middle and Comprehensive Nicholas County High School along with Integrated Career Technical Center (CTE) will be developed and constructed at the Glade Creek Site, Craigsville, WV. The site is approximately 71 acres with access roads. The proximity of the related educational facilities supports the Comprehensive High School Concept.

The new school complex will serve grades 6 – 12. The final facility plan is a multi- story arrangement and will be submitted to SBA/WVDHSEM and FEMA for inclusion to this Scope of Work as soon as practicable. The site will have over 800 parking spaces in the front and back for staff, students and to support special events. Both middle and high schools will have its designated areas within the building for their operations, administration and respective administration staff. The Schools will be separated with shared athletic and community spaces. Each of the schools will keep their own identities and have their own areas within the large building complex. The exterior design is to utilize brick, stone, glass and metal panels to create a modern look.

The space planning will allow for adequate designated areas for middle and high school as below:

Middle School Core Subject Classrooms
Middle School Collaborative Learning Spaces
Middle School Science Classroom/Lab

Middle School Science Classroom/Lab Special Needs Life Skills Classroom

Special Needs Classrooms Special Needs Resource Rooms Middle School Administrative Area

Teacher Planning Area

Middle School Lecture Classroom (large group)

Conference Rooms, Conference Areas

Student Restrooms, Teacher Restrooms Public Restrooms

Middle School Gymnasium/Locker Rooms

Wrestling Room

Weight Training Classroom

Exercise Classroom

Auditorium (seating for 1,000) Middle School Science Classrooms/Lab Advanced Placement Classrooms

Page #8

High School Biology Classroom/Lab High School Physics Classroom Lab

High School General Science Classroom/Lab

High School Core Subject Classrooms High School Collaborative Learning Spaces High School Lecture Classroom (large group) High school Gymnasium/Locker Rooms

High School Auxiliary Gymnasium

High School Collaborative Learning Spaces

High School Administrative Area

Outdoor Amphitheater Outdoor Play Area Outdoor Learning Area Dining Area, Kitchen

Technology Distribution Rooms

Building Support Spaces

Storage Rooms Receiving area Mechanical Room Electrical Room Special Needs Classrooms Special Needs Life Skills Classroom Resource Classrooms Art Classroom Band Room Sprinkler Room Band Choir Storage Room Individual Music Practice Rooms Choir Room

The Career Technical Education Center (CTE) will service both Richwood High School and Nicholas County High School students. The school system will provide transportation from Richwood High school to the new Career Technical Education Center.

The verified fourteen (14) CTE instructional areas are as below. The CTE may expand to 18 programs. NCBOE will submit any change requests if the verified 14 CTE instructional areas are changed to a maximum of 18:

- Forest Industry/Plant Systems Technology
- HVAC Technician Program
- Carpentry Program
- JROTC Program
- Therapeutic Services Program
- Pro-Start Restaurant Management Program
- Welding Program
- Pre-Engineering Project Lead the Way Program
- Automotive Technology Program
- Electrical Technician
- Building Maintenance Operations Program
- Collision Repair Technology
- Power Equipment Systems
- Diesel Equipment Technology Program

*Upon of completion of the new facility the applicant will provide an amended, if applicable, list of programs for inclusion to the scope of work. Between the start of construction and completion, program requirements are subject to change, hence, the requirement to submit a final list.

LIST OF ATTACHMENTS

- 1. Richwood High School Total Replacement, Project Worksheets PW 842 v1, 08/21/2017
- 2. Richwood Middle School Total Replacement, Project Worksheets PW 843 v1, 08/21/2017
- 3. Summersville Middle School Replacement, Project Worksheets PW 857 v1, 08/21/2017
- 4. Land Acquisitions, Permitting, Utilities, Site Costs estimate
- 5. USACE Execution of FEMA 50% ANALYSIS v3, Nov 2016
- 6. Cost Estimate Validation NCBOE, WV by Mead & Hunt 8/17/2018
- 7. Section 406 Hazard Mitigation Proposal Access Roads and parking lots elevation to BFE
- 8. Section 406 Hazard Mitigation Proposal Brushy Fork Creek Bank Stabilization
- 9. Section 406 Hazard Mitigation Proposal Stream Gauges and Monitors
- 10. Section 406 Hazard Mitigation Proposal Safe Room(s)
- CTE Justification Document for Nicholas County Board of Education by Nicholas County Schools, Aug 1, 2018
- 12. Selected Site Evaluations by Nicholas County Schools, June 19, 2018
- 13. RFI Nicholas County School District, PA ID 067-00A15-00, FEMA-4273-DR-WV, PW 857
- 14. RFI Response Nicholas County Schools Cost justification E-mail 08/10/2018 12:10PM
 - a. Nicholas CTE High Level Conceptual Budget o81018 condensed o8/10/2018
 - b. Nicholas CTE High Level Conceptual Budget o81018 (detailed) 08/10/2018
 - c. The Proposed CTE facility 08/10/2018
 - d. Concept CTE Floor Plan 08/10/2018
- 15. FEMA Conceptual Design Submission by Nicholas County Schools, Aug 15, 2018

CONDITIONS:

PERMITS: Acquiring all necessary Federal, State, and local permits is required for Federal Funding. Non-compliance with this requirement may jeopardize the receipt of Federal funds.

RECORD RETENTION: As described in 44 CFR 13.42 (2) (b), 3(c), Sub-recipient must maintain all work-related records for a period of three (3) years from Sub-recipient closure (final payment). All records relative to this project worksheet are subject to examination and audit by the State, FEMA and Comptroller General of the United States and must reject work related to disaster specific costs.

PROCUREMENT: Applicant is cautioned when procuring services to be provided by outside Contractors, that procurement procedure must comply with applicable State and local laws and regulations, provided that the procurement conforms to the bidding requirements of 2 CFR Section 200.317. Formal bidding processes are required when the value of work at the damaged or alternate site is estimated to be greater than \$250,000.

FINAL DOCUMENTATION: Final documentation substantiating all costs must be furnished by the Applicant through the State PAO. Upon receipt, FEMA will perform a closeout Validation of the entire project(s) to ensure compliance with eligible scope of work and with all State and Federal regulations.

USE OF EXCESS FUNDS: When the sub-recipient has completed the scope of work associated with this project worksheet for less than the agreed upon cost estimate, it must certify final costs and submit a request to use excess funds, through the recipient, within 90 days of project completion for final reconciliation by FEMA. As part of this request, the sub-recipient must also provide information for intended use of the excess funds, to include the scope of work and project timeline. FEMA will initiate closure of the original sub-award and then prepare a new sub-award to document the use of the eligible excess funds and conduct all required reviews prior to obligation. As appropriate, requirements to obtain-and-maintain insurance apply to work funded with excess funds.

INSURANCE: PW 842, PW 843, PW 857 received proceeds from NFIP for \$500,000.00 each; therefore, a total of \$1,500,000.00 will be deducted in order to avoid duplication of benefits as per Section 312 of the Robert T. Stafford Act.

ENVIRONMENTAL and HISTORIC PRESERVATION: Sub-recipient must comply with applicable EHP laws, regulations and executive orders using alternative procedures. FEMA will conduct EHP compliance review prior to obligation of funds and start of construction. Sub-recipient is responsible for obtaining all necessary

permits for project implementation. FEMA will conduct additional EHP compliance reviews when fixed estimate sub-award funds are under these procedures for changes in scope of work that involve a historic property listed on National Register of Historic Places.

HAZARD MITIGATION: FEMA allowed retention of 406 mitigation funds (refer to sub-award 6a through 6d) for greater benefits of the proposed alternate projects.

FEDERAL FUNDING: Fixed Cost Estimate Sub-award of \$177,513,582

The estimate includes

- 1. 1-5,7,8 sub-awards
- 2. Validated estimate for CTE
- 3. 406 Mitigation funds 6a through 6d
- 4. Land acquisition, permitting, utilities, & site costs