

REQUEST FOR Planning Commission Action



PLANNING COMMISSION MEETING DATE:

JANUARY 28, 2019

TITLE:

**PUBLIC HEARING – TENTATIVE PARCEL
MAP NO. 2018-03 AND SPECIAL USE
PERMIT NO. 2018-01 TO SUBDIVIDE AN
EXISTING OFFICE COMPLEX INTO SIX
AIR-RIGHT CONDOMINIUMS LOCATED
AT 1920, 1924, 1928, 1932, 1936,
AND 1940 EAST DEERE AVENUE
– LUKE CORSBIE, APPLICANT
{STRATEGIC PLAN NO. 3, 2}**

Prepared by Ivan Orozco

Executive Director

PLANNING COMMISSION SECRETARY

APPROVED

- ☐ As Recommended
- ☐ As Amended
- ☐ Set Public Hearing For _____

DENIED

- ☐ Applicant's Request
- ☐ Staff Recommendation

CONTINUED TO _____

Planning Manager

RECOMMENDED ACTION

It is recommended that the Planning Commission take the following actions:

1. Adopt a resolution approving Tentative Parcel Map No. 2018-03 (County Map 2017-155), as conditioned.
2. Adopt resolution approving Special Use Permit No. 2018-01, as conditioned.

Executive Summary

Luke Corsbie, representing Alton Deere, LP., is requesting approval of a tentative parcel map and a special use permit to subdivide six commercial office buildings into six air-right condominium units and two physical parcels for the property located at 1920 East Deere Avenue.

Tentative Parcel Map applications require approval of a parcel map by the Zoning Administrator pursuant to Section 34-126 of the City of Santa Ana Municipal Code (SAMC) and application for a special use permit requires approval by the Planning Commission and City Council in concurrence with the tentative map application pursuant to Section 41-1806 of the SAMC.

Table 1: Project and Location Information

Item	Information
Project Address	1920 East Deere Avenue
Nearest Intersection	Redhill Avenue and Deere Avenue

Item	Information	
General Plan Designation	Professional Administrative Office (PAO)	
Zoning Designation	Professional (P)	
Surrounding Land Uses	North	Industrial/Office Uses
	East	Industrial/Office Uses
	South	Industrial/Office Uses
	West	Industrial/Office Uses
Property Size	9.96 Acres	
Existing Site Development	The site is currently developed with six office buildings, a surface parking lot, and landscaping.	
Use Permissions	Uses	41-313
	Development Standards	41-314 through 41-323

Project Description

Luke Corsbie is requesting approval of a tentative parcel map and special use permit a for condominium purposes to subdivide six existing office buildings into six air-right condominium units and to create two lots in order to sell the units and parcels individual owners (Table 2). Areas outside of the building walls will consist of common areas, landscaping, access and parking for these condominium units. The project will provide its own set of Covenants, Conditions, and Restrictions (CC&Rs) in order to guarantee proper maintenance and consistency within the potential owners.

Table 2 and Table 3 below describe the proposed break-down of the buildings and the current development standards for the office complex.

Table 2: Condominium Unit Information

Alton Deere Subdivision (County Map 2017-155)						
<i>Building Address</i>	<i>Parcel Number</i>	<i>Condominium Unit</i>	<i>Number of Stories</i>	<i>Total Building Square Footage</i>	<i>First Floor SQ. FT.</i>	<i>Second Floor SQ. FT.</i>
1920 E. Deere	1	1	1	11,940	11,940	N/A
1924 E. Deere	1	2	2	22,944	11,152	11,792
1928 E. Deere	1	3	1	11,352	11,352	N/A
1932 E. Deere	1	4	2	31,474	14,938	16,536
1936 E. Deere	2	6	2	57,044	38,352	18,692
1940 E. Deere	2	5	2	31,826	15,290	16,536

Table 3: Development Standards

SAMC Sec. 41-314 to 41-323		
<i>Standard</i>	<i>Required</i>	<i>Provided</i>
Height	35 Feet	30 Feet
Front Setback	15 Feet	30 Feet
Side Setback	5 Feet	57 Feet
Rear Setback	10 Feet	46 Feet
Off-Street Parking (Includes ADA Stalls per Code)	585 spaces	589 spaces

Project Background

The site was developed with six office buildings in 1989. The buildings contain one and two stories and are addressed 1920 through 1940 East Deere Avenue. In December 2017, the City's Development Review Committee (DRC) received the subject application. The project was revised to comply with the DRC's requirements. These revisions also included upgrades to driveways aprons, landscaping, and fire-related mitigation measures such as appropriate locations for water hydrants. The site currently meets the landscaping requirements related to buffers and setbacks. However, proposed conditions will require the project to comply with the drought tolerant landscaping requirements set forth in the Water Efficiency Landscape Ordinance, enacted in 2015.

The tentative map is subject to the approval of the Zoning Administrator, while the special use permit requires Planning Commission approval, followed by the City Council consent review for both applications. In an effort to expedite the discretionary process, both applications were bundled to start at the at the Planning Commission review.

Project Analysis

Tentative Parcel Map

Subdivision requests are governed by Chapter 34 and Chapter 41 of the SAMC. Pursuant to Section 66473.5 and 66474 of the California Subdivision Map Act, applications for tentative parcel maps are approved when it can be shown that findings can be made in support of the request.

Specifically, findings related to the proposal need to be made that the project is: consistent with the General Plan; the site is physically suitable for the type and density of the proposed project; the proposed project will not cause substantial environmental damage or substantially and avoidably injure fish and wildlife or their habitat, the proposed project will not cause serious public health problems; and the proposed project will not conflict with easements necessary for public access through or use of the property. Using this information staff has prepared the following analysis, which, in turn forms the basis for the recommendation contained in this report. In analyzing the

applicant's request, staff believes that the following analysis warrants approval of the tentative tract map.

The applicant is seeking approval of a tentative parcel map to subdivide for condominium purposes, as the proposed development consists of six multi-use office buildings. Upon completion of the subdivision, the project site will continue to be utilized for commercial office use in the form of detached one-story and two-story concrete tilt-up structures. In reviewing the project, staff determined that the proposal as conditioned is consistent with the various provisions of the City's Zoning Code and General Plan, including lot size, lot coverage, and parking. Furthermore, conditions of approval have been included to bring the site's landscaping and architectural design to be in compliance with all applicable standards of the SAMC. Additionally, Covenants, Conditions and Restrictions (CC&Rs) will be adopted to define the operating and maintenance requirements. The CC&Rs will also create a property owner's association responsible for maintenance and enforcement of the CC&R provisions. Finally, the proposed subdivision is consistent with the Professional and Administrative Office (PAO) General Plan land use designation and all other elements of the General Plan.

No adverse environmental impacts to fish or wildlife populations were identified as the project site is located in a built-out, urbanized area. Finally, the tentative tract map was found to be consistent with the California Subdivision Map Act and Chapter 34 of the Municipal Code as well as the California Subdivision Map Act. The existing buildings on the project site were constructed in compliance with all applicable city standards at the time of construction with no new constructions proposed as part of this project.

Special Use Permit

In August 2007, Ordinance No. NS-2755 was adopted that created regulations (Sec. 41-1800 through 1809 of the Santa Ana Municipal Code) for the conversion of commercial and industrial buildings into air-space condominiums. These standards were created to ensure that the commercial and industrial condominiums would remain economically viable and would not negatively affect the surrounding properties. The ordinance also created a new method of approving commercial and industrial condominium conversions by a special use permit, which requires approval by the Planning Commission concurrent with the tentative map application.

An improvement plan per Sec. 41-1804 (a) of the SAMC is required as part of the special use permit approval. The purpose of the plan is to identify potential upgrades to the building to bring the structure into current construction standards. The plan must provide details of the site's ability to comply with off-street parking, sound transmission, energy efficiency, open space, setbacks,

adopted design guidelines and landscaping. As part of the Development Review process and prior to the submittal of the tentative parcel map and special use permit application, the site was surveyed for consistency with the current off-street parking regulations, landscaping and accessibility. Current regulations pertaining to fire response and safety were also addressed with special consideration to the drive aisles and on-site fire hydrant locations. The construction of the six buildings are made up

of a combination concrete tilt-up and glass office. Future improvements within the buildings will be consistent to all Title 24 Building Code requirements.

Additionally, Section 41-1805 of the SAMC requires separate meters for the units. The metering includes electric, gas, and water service for each of the units, or in this case buildings. The individual utility services for each building will all be provided underground, as Sec. 41-626 of the SAMC, pertaining to utility services requires that all commercial and industrial developments provide underground utilities.

Table 4: CEQA, Strategic Plan Alignment, and Public Notification & Community Outreach

CEQA, Strategic Plan Alignment, and Public Notification & Community Outreach	
CEQA	
CEQA Type	Class 1 - The project qualifies as a minor land division project under the provisions set forth in Section 15301 of the CEQA guidelines.
Reason(s) Exempt or Analysis	This exemption applies to the subdivision of existing commercial or industrial buildings, where no physical changes occur which are not otherwise exempt. No construction is proposed as part of the application.
Strategic Plan Alignment	
Goal(s), Policy or Policies	Approval of this item supports the City's efforts to meet Goal #3 – Economic Development, Objective #2 (create new opportunities for business/job growth and encourage private development through new General Plan and Zoning policies)
Public Notification & Community Outreach	
Required Measures	A public notice was posted on the project site on January 17, 2019.
	Notification by mail was mailed to all property owners and occupants within 500 feet of the project site on January 17, 2019.
	Newspaper posting was published in the Orange County Reporter on January 17, 2019.

Economic Development Benefits

The project will generate property tax revenue, permanent jobs and services for the community. Property tax revenue will increase as the current single lot will be subdivided into two lots. Additionally, the existing buildings will be converted to air-right condominiums and may be sold individually. The total net value of the property will increase and will create additional economic investment into the area.

Conclusion

Based on the analysis provided within this report, staff recommends that the Planning Commission approve Tentative Parcel Map No. 2018-03 and Special Use Permit No. 2018-01 as conditioned.



Ivan Orozco
Assistant Planner II

IO: sb

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- Exhibits:
- 1 – Resolution
 - 2 – Vicinity Zoning and Aerial View
 - 3 – Site Photo
 - 4 – Landscape Plan
 - 5 – Tentative Parcel Map

EXHIBIT 1

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RESOLUTION NO. 2019-xx

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF SANTA ANA APPROVING TENTATIVE PARCEL MAP NO. 2018-03 AND SPECIAL USE PERMIT NO. 2018-01 AS CONDITIONED TO SUBDIVIDE AN EXISTING COMMERCIAL DEVELOPMENT INTO SIX AIR-RIGHT CONDOMINIUM UNITS AND TWO LOTS FOR THE PROPERTY LOCATED AT 1920, 1924, 1928, 1932, 1936, AND 1940 EAST DEERE AVENUE

BE IT RESOLVED BY THE PLANNING COMMISSION OF THE CITY OF SANTA ANA AS FOLLOWS:

Section 1. The Planning Commission of the City of Santa Ana hereby finds, determines and declares as follows:

- A. Luke Corsbie, representing Alton Deere, LP ("Applicant"), is requesting approval of a tentative parcel map to subdivide an existing office development into six air-right condominiums and two parcels for the property located at 1920 East Deere Avenue.
- B. Applications for tentative parcel maps require approval of a parcel map by the Zoning Administrator pursuant to Section 34-126 of the Santa Ana Municipal Code (SAMC) and application for a special use permit requires approval by the Planning Commission and City Council in concurrence with the tentative map application.
- C. Tentative Parcel Map No. 2018-03 (County Map 2017-149) and Special Use Permit No. 2018-01 came before the Planning Commission of the City of Santa Ana on January 28, 2019, for a duly noticed public hearing.
- D. Subdivision requests are governed by Chapter 34 and Chapter 41 of the SAMC. Pursuant to Sections 66473.5 and 66474 of the California Subdivision Map Act, applications for tentative parcel maps are approved when certain findings can be established.
- E. The Planning Commission of the City of Santa Ana determines that following findings, which must be established in order to approve Tentative Parcel Map No. 2018-03, have been established as required by SAMC Section 34-126 and the California Subdivision Map Act:
 - 1. The proposed project and its design and improvements are consistent with the Professional and Administrative Office (PAO) designation of the General Plan and are otherwise consistent with all other Elements of the General Plan.

Tentative Parcel Map No. 2018-03, as conditioned, and its design and improvements will be consistent with the Professional and Administrative Office (PAO) land use designation of the General Plan and are otherwise consistent with all other Elements of the General Plan and applicable Specific Plans. The proposed subdivision promotes Land Use Element Policy 5.4, which supports land uses that are consistent with the Land Use Element. The project is located within the Professional (P) zoning district and is consistent with the Professional and Administrative Office (PAO) land use designation and all other elements of the General Plan.

2. The proposed project conforms to all applicable requirements of the zoning and subdivision codes as well as other applicable City ordinances.

Tentative Parcel Map No. 2018-03, as conditioned, will conform to all applicable requirements of the zoning and subdivision codes as well as other applicable City ordinances. The proposed project, as conditioned, conforms to the provisions of Chapter 34 and 41 of the Santa Ana Municipal Code including parking, setbacks and height. In addition, Covenants, Conditions and Restrictions (CC&Rs) will address issues such as drainage, reciprocal access, landscaping and maintenance that will be recorded prior to approval of the final map.

3. The project site is physically suitable for the type and density of the proposed project.

The project site is physically suitable for the type and density of the proposed project. The existing buildings on the project site were constructed in compliance with applicable city standards at the time of construction. There is no new construction or building expansion being proposed as part of this project. Any future development will comply with the provisions of the Santa Ana Municipal Code.

4. The design and improvements of the proposed project will not cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.

The design and improvements of the proposed project will not cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat. Since the project is located in an urbanized area, there are no known

fish or wildlife populations existing on the project site. Therefore, the proposed subdivision will not cause any substantial environmental damage or substantially and avoidably injure fish and wildlife or their habitat.

5. The design or improvements of the proposed project will not cause serious public health problems.

The design or improvements of the proposed project will not cause serious health problems, with the proposed subdivision not having any detrimental effects upon the general public. All necessary utilities and infrastructure improvements currently exist and comply with City standards. Therefore, approval of this subdivision will not cause any serious public health problems.

6. The design or improvements of the proposed project will not conflict with easements necessary for public access through or use of, property within the proposed project.

The designs or improvements associated with approval of the tentative parcel map will not conflict with easements necessary for public access through or use of the property within the proposed project. The project site will allow for shared common driveway access within development, which is outlined in the CC&Rs. The CC&Rs will ensure all ingress and egress easement and access will be maintained for the project site.

- F. A special use permit is required for commercial or industrial condominium conversion projects. The findings required for such special use permit requests are governed by SAMC Section 41-1807. For Special Use Permit No. 2018-01, the Planning Commission of the City of Santa Ana determines that the following findings have been established:

1. The proposed conversion of an existing commercial office development will not adversely impact the economic viability of large-scale commercial and industrial uses in the vicinity of the development, or in the city as a whole.

The proposed conversion will not adversely impact the economic viability of large-scale commercial and industrial uses in the vicinity of the development, or in the city as a whole. The site is located to the northwest of the Redhill Avenue and Deere Avenue and within an established office park, offering various office type uses. There is no physical expansion of the existing buildings proposed with this

project. The condominium ownership will allow a new tenant or owner to lease or own a portion of the subdivided office building, thereby identifying the area as a stable and viable location for potential economic investment.

2. The proposed conversion of an existing commercial office development includes sufficient provisions for governance, funding and capitalization, and enforcement mechanisms to insure that the common area continues to be adequately and safely maintained and repaired for the life of the common interest development.

The proposed conversion includes sufficient provisions for governance, funding and capitalization, and enforcement mechanisms to insure that the common area continues to be adequately and safely maintained and repaired for the life of the common interest development. The creation of air-space condominiums will not negatively affect the property or maintenance of the site. The site is currently being maintained by a single ownership entity and will continue to operate uniformly with the establishment of new CC&Rs. Additionally, the creation of a sub-association for the proposed project will facilitate future maintenance between the different property owners.

3. The proposed conversion of an existing commercial office development includes sufficient provisions for the retention of such common areas for the use of all owners of separate interests therein.

The proposed conversion includes sufficient provisions for the retention of such common areas for the use of all owners of separate interests therein. The proposed subdivision will maintain the existing parking and common areas open to all condominium owners. Additionally, the CC&Rs will ensure that all parties are granted proper access and parking on-site.

4. The proposed conversion of an existing commercial office development complies with the goals, policies and objectives of the city's general plan.

The proposed conversion complies with the goals, policies, and objectives of the city's general plan. Policy 2.8 of the Land Use Element promotes the rehabilitation of commercial properties and encourages increased level of capital investment. The commercial condominiums will allow individual ownership and increase capital investment in the

City. Policy 2.9 of the Land Use Element supports development that creates a business environment that is safe and attractive. A condition of approval will require the removal of any graffiti that may occur on the site. Policy 5.5 encourages development that is compatible and supportive of surrounding land uses. The Alton Deere Subdivision is located in an area with a mixture of professional and industrial uses and the proposed project will help to maintain compatibility with the surrounding professional and industrial uses.

Section 2. In accordance with the California Environmental Quality Act (CEQA), the recommendation is exempt from further review pursuant to Section 15301 of the CEQA Guidelines. This Class 1 exemption allows the subdivision of existing commercial or industrial buildings where no physical changes occur. Categorical Exemption Environmental Review No. 2017-149 will be filed for this project.

Section 3. The Applicant agrees to indemnify, hold harmless, and defend the City of Santa Ana, its officials, officers, agents, and employees, from any and all liability, claims, actions or proceedings that may be brought arising out of its approval of this project, and any approvals associated with the project, including without limitation, any environmental review or approval, except to the extent caused by the sole negligence of the City of Santa Ana.

Section 4. The Planning Commission of the City of Santa Ana, after conducting the public hearing, hereby approves Tentative Parcel Map No. 2018-03 (County Map 2017-149) and Special Use Permit No. 2018-01 as conditioned in Exhibit A, attached hereto and incorporated as though fully set forth herein for the property located at 1920, 1924, 1928, 1932, 1936, and 1940 East Deere Avenue. This decision is based upon the evidence submitted at the above said hearing, which includes, but is not limited to: the Request for Planning Commission Action dated January 28, 2019, and exhibits attached thereto; and, the public testimony, written and oral, all of which are incorporated herein by this reference.

ADOPTED this 28th day of January 2019, by the following vote:

AYES:	Commissioners:
NOES:	Commissioners:
ABSENT:	Commissioners:
ABSTENTIONS:	Commissioners:

Mark McLoughlin
Chairperson

APPROVED AS TO FORM:
Sonia R. Carvalho, City Attorney

By: _____
Lisa Storck
Assistant City Attorney

CERTIFICATE OF ATTESTATION AND ORIGINALITY

I, SARAH BERNAL, Recording Secretary, do hereby attest to and certify the attached Resolution No. 2019-xx to be the original resolution adopted by the Planning Commission of the City of Santa Ana on January 28, 2019.

Date: _____

Recording Secretary
City of Santa Ana

EXHIBIT A

I. Conditions for Approval for Tentative Parcel Map No. 2018-03 and Special Use Permit No. 2018-01

Tentative Parcel Map No. 2018-03 and Special Use Permit No. 2018-01 are approved subject to compliance, to the reasonable satisfaction of the Planning Manager, with applicable sections of the Santa Ana Municipal Code, the California Administrative Code, the California Building Standards Code, and all other applicable regulations. In addition, Applicant shall meet the following conditions of approval:

The Applicant must comply with each and every condition listed below prior to exercising the rights conferred by this tentative tract map.

The Applicant must remain in compliance with all conditions listed below throughout the life of the development project. Failure to comply with each and every condition may result in the revocation of the tentative tract map and the special use permit.

A. Planning Division

1. All proposed site improvements must conform to the Site Plan Review approval of DP No. 2017-42.
2. Two copies of the recorded final parcel map shall be submitted each to the Planning Division, Building Division and Public Works Agency within 10 days of recordation.
3. Applicant must submit Covenants, Conditions and Restrictions (CC&Rs) for the project to the case planner for review and approval prior to the final map being recorded. Additionally, CC&Rs will be adopted to define the operating and maintenance requirements. It will also create a property owner's association responsible for maintenance and enforcement of the CC&Rs.
4. The tentative parcel map, final map and all improvements required to be made or installed by the subdivider shall be in accordance with the requirements and design standards and specifications of the City of Santa Ana and the requirements of the State Subdivision Map Act.
5. After project occupancy, landscaping is to be maintained in accordance with the landscape plan approved for the project. This shall include the minimum levels of plant materials shown on the landscape plan and installed at the time of occupancy.

6. The property owner shall be responsible for maintaining the lots free from debris, overgrown vegetation, and graffiti. The property owner shall provide as part of the Covenants, Conditions and Restrictions (CC&Rs) that the owner of each condominium shall immediately remove any graffiti placed thereon. Any graffiti must be removed within 24 hours
7. The final map must be approved and recorded prior to issuance of on-site improvements such as, but not limited to the sidewalk and driveway apron improvements.
8. Development within the area of the map is subject to development and permit fees in effect at the time of permit issuance. Prior to approval of Certificate of Occupancy, all on-site improvements shall be made in accordance with the submitted plans.
9. Prior to submittal of the final map, submit a management plan per Section 34-184 of the Santa Ana Municipal Code.
10. Prior to submittal of the final map, submit a conversion plan per Section 41-1804 of the Municipal Code.
11. Landscaping shall be maintained in compliance with the submitted plan. Any modifications to this plan shall be submitted to the Planning Division for review and subject to the approval of the Planning Manager.
12. Property Maintenance Agreement. Subject to review and applicability by the Planning and Building Agency, the Public Works Agency, and the City Attorney to ensure that the property and all improvements located thereupon are properly maintained, Developer (and the owner of the property upon which the authorized use and/or authorized improvements are located if different from the Applicant) shall execute a maintenance agreement or incorporate the form of this condition within the Project's CC&R's with the City of Santa Ana which shall be recorded against the property and which shall be in a form reasonably satisfactory to the City Attorney. The maintenance agreement shall contain covenants, conditions and restrictions relating to the following:
 - a. Compliance with operational conditions applicable during any period(s) of construction or major repair (e.g., proper screening and securing of the construction site; implementation of proper erosion control, dust control and noise mitigation measure; adherence to approved project phasing etc.);
 - b. Compliance with ongoing operational conditions, requirements and restrictions, as applicable (including but not limited to hours of operation, security requirements, the proper storage and disposal of trash and

debris, enforcement of the parking management plan, and/or restrictions on certain uses,

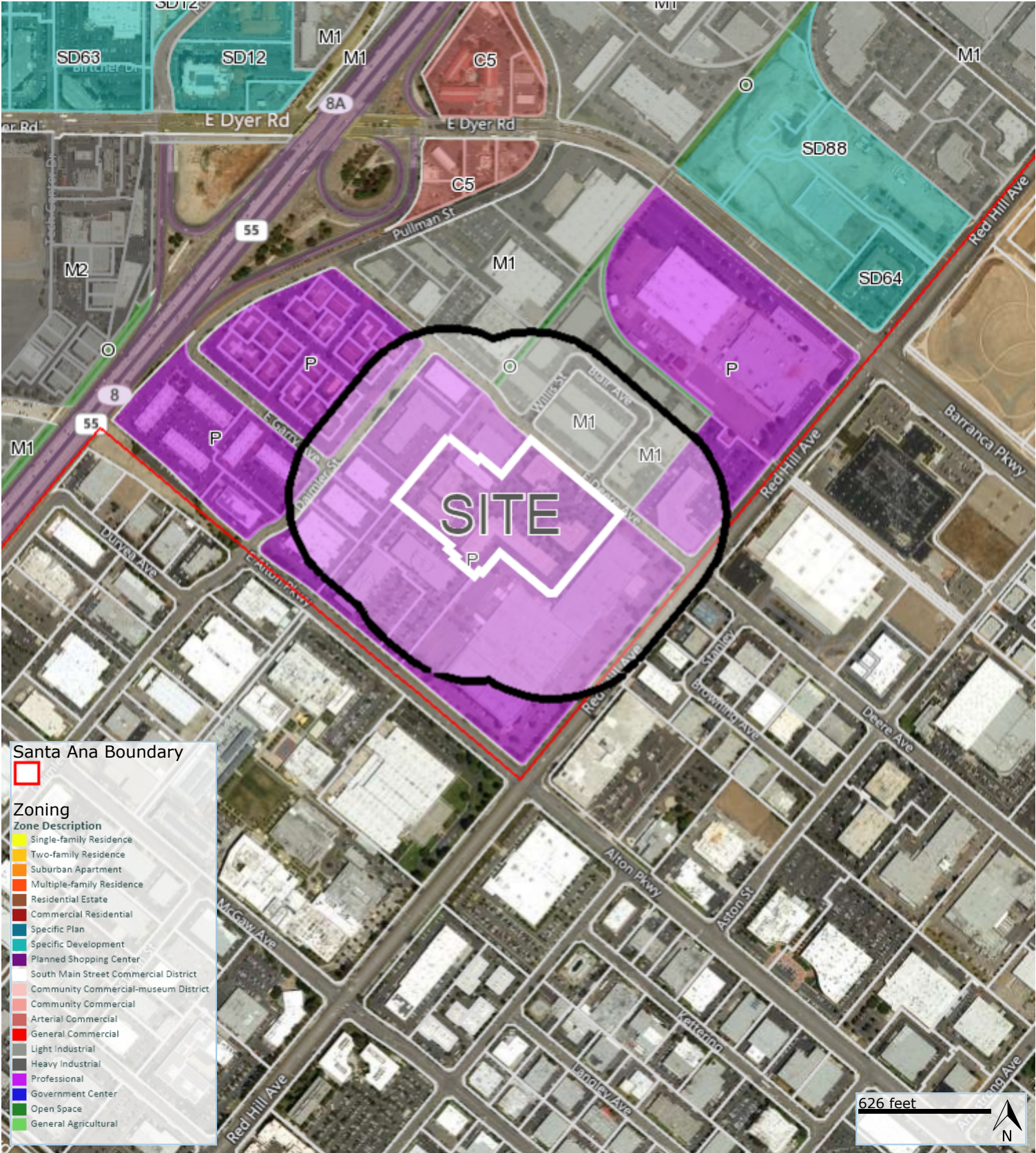
- c. Ongoing compliance with approved design and construction parameters, signage parameters and restrictions as well as landscape designs, as applicable;
- d. Ongoing maintenance, repair and upkeep of the property and all improvements located thereupon (including but not limited to controls on the proliferation of trash and debris about the property; the proper and timely removal of graffiti; the timely maintenance, repair and upkeep of damaged, vandalized and/or weathered buildings, structures and/or improvements; the timely maintenance, repair and upkeep of exterior paint, parking striping, lighting and irrigation fixtures, walls and fencing, publicly accessible bathrooms and bathroom fixtures, landscaping and related landscape improvements and the like, as applicable);
- e. If Developer and the owner of the property are different (e.g., if the Applicant is a tenant or licensee of the property or any portion thereof), both the Applicant and the owner of the property shall be signatories to the maintenance agreement and both shall be jointly and severally liable for compliance with its terms.
- f. The maintenance agreement shall further provide that any party responsible for complying with its terms shall not assign its ownership interest in the property or any interest in any lease, sublease, license or sublicense, unless the prospective assignee agrees in writing to assume all of the duties and obligations and responsibilities set forth under the maintenance agreement.
- g. The maintenance agreement shall contain provisions relating to the enforcement of its conditions by the City and shall also contain provisions authorizing the City to recover costs and expenses which the City may incur arising out of any enforcement and/or remediation efforts which the City may undertake in order to cure any deficiency in maintenance, repair or upkeep or to enforce any restrictions or conditions upon the use of the property. The maintenance agreement shall further provide that any unreimbursed costs and/or expenses incurred by the City to cure a deficiency in maintenance or to enforce use restrictions shall become a lien upon the property in an amount equivalent to the actual costs and/or expense incurred by the City.
- h. The execution and recordation of the maintenance agreement shall be a condition precedent to the final map being recorded.

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EXHIBIT 2

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PM 2018-03 SUP 2018-01, ALTON-DEERE PLAZA
1920 EAST DEERE AVENUE



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EXHIBIT 3

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TM No. 2018-03 SUP No. 2018-01
ALTON-DEERE PLAZA
1920 EAST DEERE AVENUE

SITE PHOTO
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EXHIBIT 4

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EXHIBIT 5

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