

**CITY OF EL PASO, TEXAS**  
**AGENDA ITEM DEPARTMENT HEAD'S SUMMARY FORM**

**DEPARTMENT:** Planning and Inspections Department, Planning Division

**AGENDA DATE:** Introduction: March 10, 2015  
Public Hearing: March 31, 2015

**CONTACT PERSON/PHONE:** Michael McElroy, (915) 212-1612, [mcelroyms@elpasotexas.gov](mailto:mcelroyms@elpasotexas.gov)

**DISTRICT(S) AFFECTED:** 1

**SUBJECT:**

An Ordinance granting Special Permit No. PZST14-00036 to allow for infill development with a rear yard setback reduction, 50 percent density bonus, and a 50 percent parking reduction on the property described as Lot 2, Block 1, Cudahy-Locke Subdivision, 190 Edgar Road, City of El Paso, El Paso County, Texas, pursuant to Section 20.10.280 Infill Development of the El Paso City Code. The penalty being as provided for in Chapter 20.24 of the El Paso City Code. Subject Property: 190 Edgar Road. Property Owner: Cudahy-Locke Investments LLC. PZST14-00036 (**District 1**)

**BACKGROUND / DISCUSSION:**

N/A

**PRIOR COUNCIL ACTION:**

N/A

**AMOUNT AND SOURCE OF FUNDING:**

N/A

**BOARD / COMMISSION ACTION:**

City Plan Commission Approval Recommendation (7-0)

\*\*\*\*\*REQUIRED AUTHORIZATION\*\*\*\*\*

**LEGAL:** (if required) N/A

**FINANCE:** (if required) N/A

**DEPARTMENT HEAD:**

Mathew S. McElroy  
Director, Planning and Inspections Department

**APPROVED FOR AGENDA:**

**CITY MANAGER:** \_\_\_\_\_

**DATE:** \_\_\_\_\_

ORDINANCE NO. \_\_\_\_\_

**AN ORDINANCE GRANTING SPECIAL PERMIT NO. PZST14-00036 TO ALLOW FOR INFILL DEVELOPMENT WITH A REAR YARD SETBACK REDUCTION, 50 PERCENT DENSITY BONUS, AND A 50 PERCENT PARKING REDUCTION ON THE PROPERTY DESCRIBED AS LOT 2, BLOCK 1, CUDAHY-LOCKE SUBDIVISION, 190 EDGAR ROAD, CITY OF EL PASO, EL PASO COUNTY, TEXAS, PURSUANT TO SECTION 20.10.280 INFILL DEVELOPMENT OF THE EL PASO CITY CODE. THE PENALTY BEING AS PROVIDED FOR IN CHAPTER 20.24 OF THE EL PASO CITY CODE.**

**WHEREAS**, Cudahy-Locke Investments LLC, has applied for a Special Permit for infill development under Section 20.10.280 of the El Paso City for a rear yard setback reduction, 50 percent density bonus, and a 50 percent parking reduction; and,

**WHEREAS**, a report was made to the City Plan Commission and a public hearing was held regarding such application; and,

**WHEREAS**, the City Plan Commission has recommended approval of the subject Special Permit; and,

**WHEREAS**, the subject Special Permit has been submitted to the City Council of the City of El Paso for review and approval; and,

**WHEREAS**, the City Council of the City of El Paso finds that the application conforms to all requirements of Sections 20.04.320 of the El Paso City Code.

**NOW, THEREFORE, BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF EL PASO:**

1. That the property described as follows is in a C-3 (Commercial) Zone District:  
*Lot 2, Block 1, Cudahy-Locke Subdivision, 190 Edgar Road, City of El Paso, El Paso County, Texas; and,*
2. That the City Council hereby grants a Special Permit under Sections 20.04.320 of the El Paso City Code, to allow an infill development for a rear yard setback reduction, 50 percent density bonus, and a 50 percent parking reduction and,
3. That this Special Permit is issued subject to the development standards in the C-3 (Commercial) District regulations and is subject to the approved Detailed Site Development Plan, signed by the Applicant, the City Manager and the Executive Secretary to the City Plan Commission. A copy of this plan is attached hereto as Exhibit "A" and incorporated herein by reference for all purposes; and,

ORDINANCE NO. \_\_\_\_\_

**PZST14-00036**

4. That if at any time the Owner fails to comply with any of the requirements of this Ordinance, Special Permit No. PZST14-00036 shall automatically terminate, and construction shall stop or occupancy shall be discontinued, until any such violation ceases; and,
5. That the Owner shall sign an Agreement incorporating the requirements of this Ordinance. Such Agreement shall be signed and filed with the Zoning Administrator and the Executive Secretary of the City Plan Commission before building permits are issued.

**ADOPTED** this \_\_\_\_\_ day of \_\_\_\_\_, 2015.


**THE CITY OF EL PASO**

**ATTEST:**

\_\_\_\_\_  
Oscar Leeser  
Mayor

\_\_\_\_\_  
Richarda Duffy Momsen  
City Clerk

**APPROVED AS TO FORM:**

  
\_\_\_\_\_  
Karla M. Nieman  
Assistant City Attorney

**APPROVED AS TO CONTENT:**

\_\_\_\_\_  
Mathew S. McElroy, Director  
Planning and Inspections Department

**ORDINANCE NO.** \_\_\_\_\_

**PZST14-00036**

## AGREEMENT

Cudahy-Locke Investments LLC, referred to in the above Ordinance, hereby agrees to develop the above-described property in accordance with the approved Detailed Site Development Plan attached to same Ordinance, and in accordance with the standards identified in the C-3 (Commercial) District regulations, and subject to all other requirements set forth in this Ordinance.

**EXECUTED** this \_\_\_\_\_ day of \_\_\_\_\_, 2015.

Cudahy-Locke Investments LLC:

By: \_\_\_\_\_  
(name/title)  
\_\_\_\_\_  
(signature)

## ACKNOWLEDGMENT

THE STATE OF TEXAS    )  
                                      )  
COUNTY OF EL PASO    )

This instrument is acknowledged before me on this \_\_\_\_\_ day of \_\_\_\_\_, 2015, by \_\_\_\_\_, for Cudahy-Locke Investments LLC, as Owner.

My Commission Expires:

\_\_\_\_\_

\_\_\_\_\_  
Notary Public, State of Texas

Notary's Printed or Typed Name:

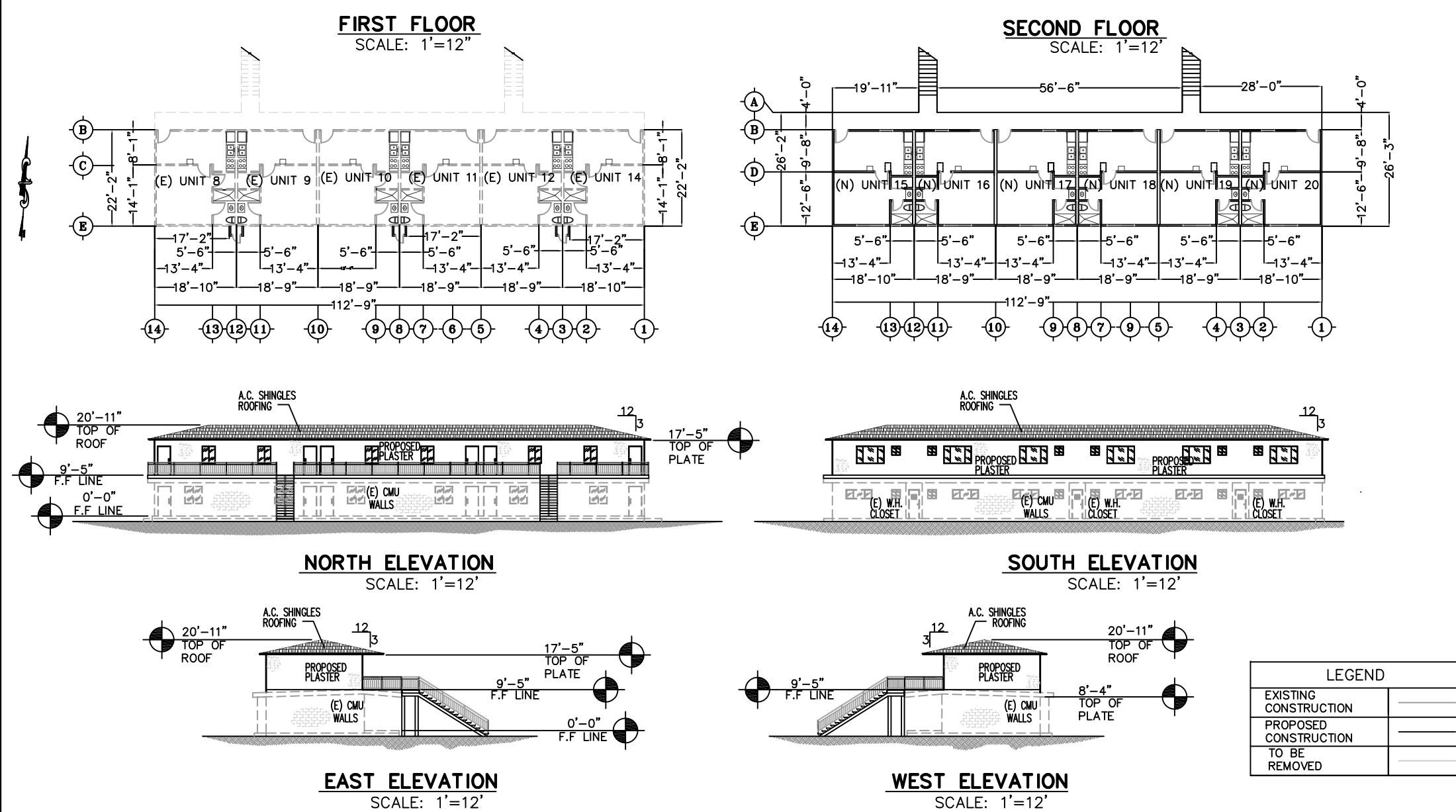
\_\_\_\_\_

**ORDINANCE NO.** \_\_\_\_\_

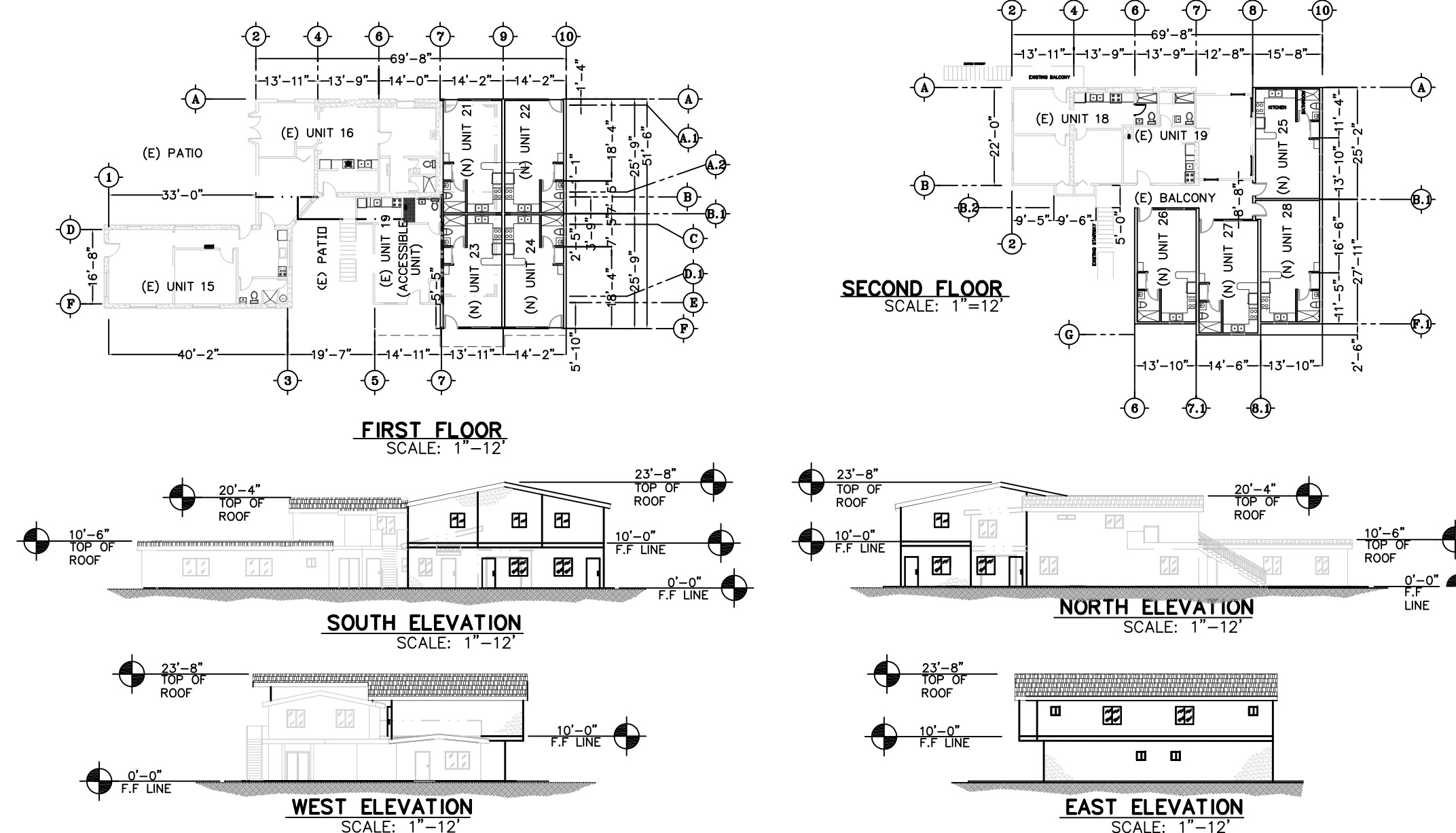
**PZST14-00036**



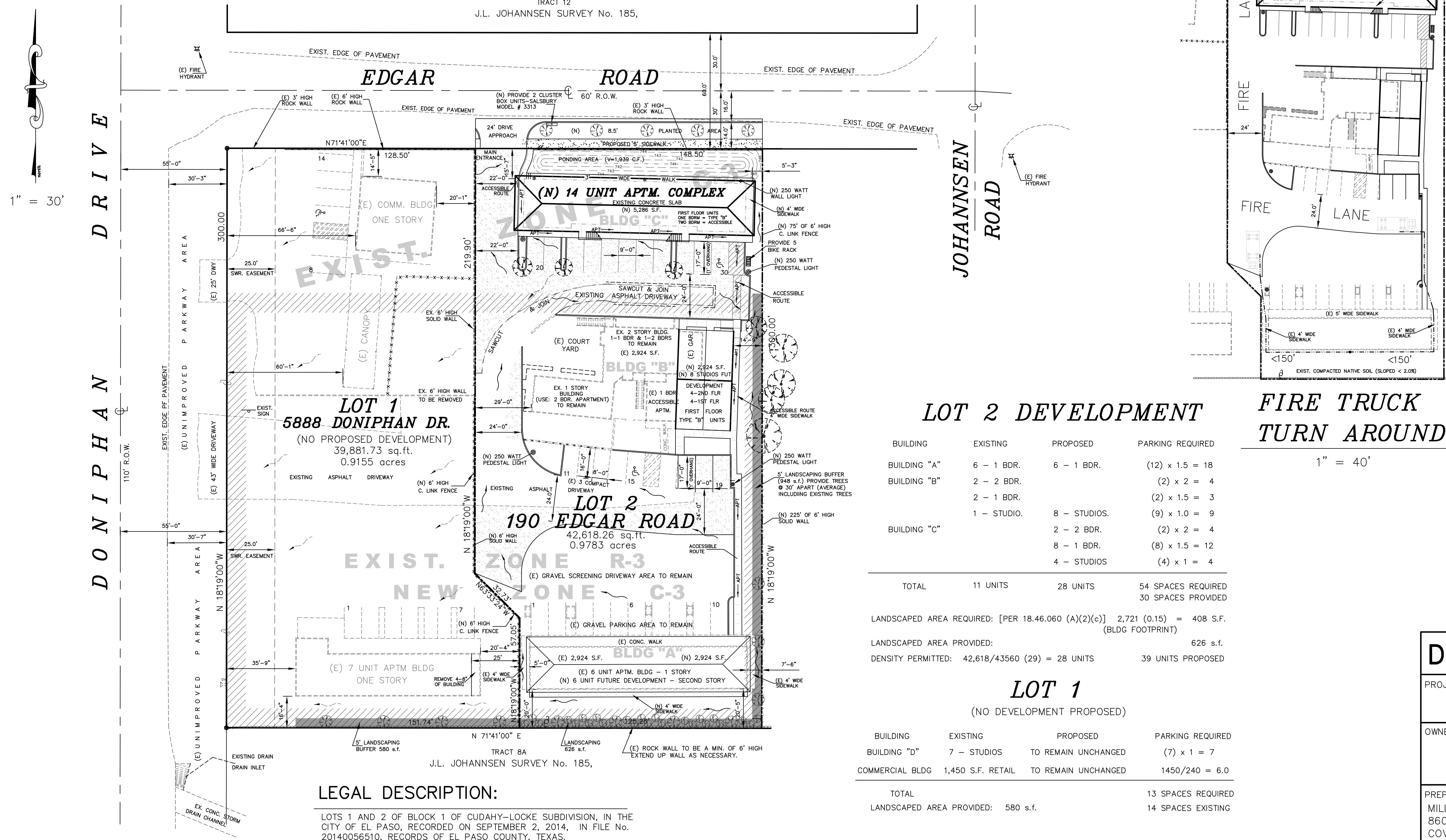
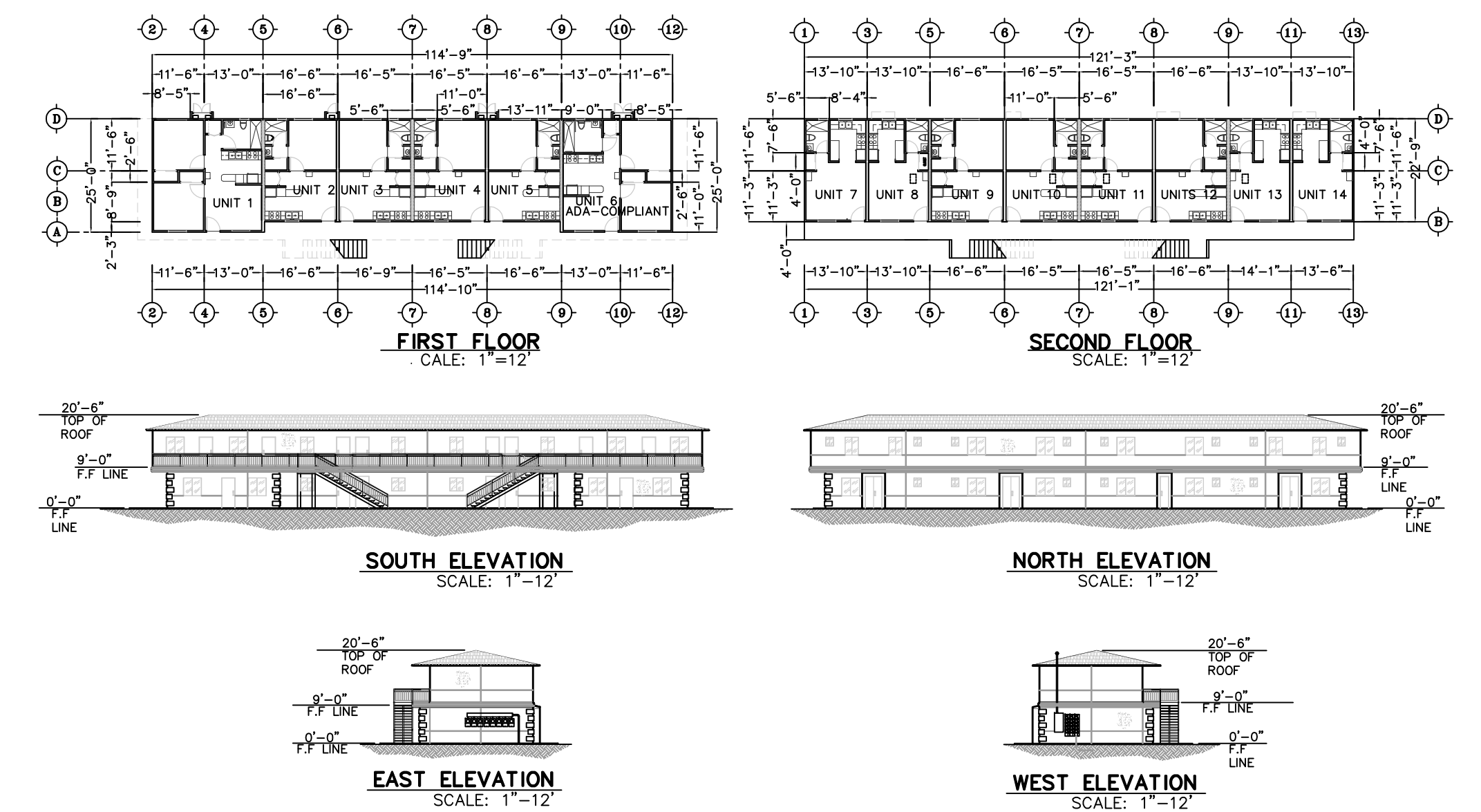
## EXISTING BUILDING "A"



## EXISTING BUILDING "B"



## NEW BUILDING "C"



## LEGAL DESCRIPTION:

LOTS 1 AND 2 OF BLOCK 1 OF CUDAHY-LOCKE SUBDIVISION, IN THE CITY OF EL PASO, RECORDED ON SEPTEMBER 2, 2014, IN FILE NO. 20140056510, RECORDS OF EL PASO COUNTY, TEXAS.

## DETAILED SITE DEVELOPMENT PLAN

PROJECT 39 UNIT APARTMENT COMPLEX 5888 DONIPHAN DR. & 190 EDGAR ROAD, EL PASO TX			
OWNER: CUDAHY-LOCKE INVESTMENTS LLC 252 SUMMERBROOKE CT EL PASO, TEXAS 79932		SITE ADDRESS: 190 EDGAR ROAD EL PASO, TEXAS 79932	
PREPARED BY: MILLOT ENGINEERING CO. 860 N. VICEROY AVE. COVINA, CA. 91723	FILE SiteDevelopmentPlan.dwg	SHEET: <b>1 OF 1</b>	
	SCALE: AS SHOWN		

## **MEMORANDUM**

**DATE:** February 20, 2015

**TO:** The Honorable Mayor and City Council  
Tommy Gonzalez, City Manager

**FROM:** Michael McElroy, Planner

**SUBJECT: PZST14-00036 (Related to PZRZ14-00063)**

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The City Plan Commission (CPC), on February 12, 2015, voted 7-0 to recommend **approval** of a special permit to allow infill development with a rear yard setback reduction, 50 percent density bonus, and a 50 percent parking reduction, to permit the expansion of an existing apartment complex.

The CPC found that the special permit is in conformance with Plan El Paso. The CPC also determined that the special permit protects the best interest, health, safety and welfare of the public in general; that the proposed use is compatible with adjacent land uses; and the special permit will have no negative effects on the natural environment, social economic conditions, and property values in the vicinity and the city as a whole.

There was one phone call in support of the special permit request.

**Attachment:**  
Staff Report



## ***City of El Paso – City Plan Commission Staff Report***

**Case No:** PZST14-00036  
**Application Type:** Special Permit and Detailed Site Development Plan Review  
**CPC Hearing Date:** February 12, 2015  
**Staff Planner:** Michael McElroy, 915-212-1612, mcelroyms@elpasotexas.gov  
**Location:** 190 Edgar Road  
**Legal Description:** Lot 2, Block 1, Cudahy-Locke Subdivision, City of El Paso, El Paso County, Texas  
**Acreage:** 0.9861  
**Rep District:** 1  
**Existing Zoning:** C-3 (Commercial) and R-3 (Residential)  
**Existing Use:** Apartments  
**C/SC/SP/ZBA/LNC:** Registered Legal Non-Conforming for apartments, RV, and mobile home park prior to annexation  
**Request:** Rear Yard Setback Reduction / 50% Density Bonus / 50% Parking Reduction (Related to Rezoning PZRZ14-00063)  
**Proposed Use:** Apartments  
**Property Owner:** Cudahy-Locke Investments LLC  
**Representative:** Gilberto Millot

### **SURROUNDING ZONING AND LAND USE**

**North:** R-3 (Residential) / Automobile wrecking yard  
**South:** R-3 (Residential) / Single family and duplex dwellings  
**East:** R-3 (Residential) / Single family and duplex dwellings  
**West:** P-I/sc (Planned-Industrial/special contract) and P-R 2/sc (Planned Residential II/special contract) / Automobile auctions and single family dwellings

**PLAN EL PASO DESIGNATION:** G-3 Post-War (Northwest Planning Area)

**NEAREST PARK:** Ruby Coates Park (1,421 feet)

**NEAREST SCHOOL:** Herrera Elementary (1,880 feet)

### **NEIGHBORHOOD ASSOCIATIONS**

Upper Valley Improvement Association  
Upper Mesa Hills Neighborhood Association  
Montoya Heights Community Improvement Association  
Coronado Neighborhood Association  
Upper Valley Neighborhood Association  
Save the Valley

### **NEIGHBORHOOD INPUT**

Notice of a Public Hearing was mailed to all property owners within 300 feet of the subject property on January 28, 2015. The Planning Division received one phone call in support of the special permit.

### **APPLICATION DESCRIPTION**

The request is for a special permit and detailed site plan development approval to allow for infill development for a reduction in the rear yard setback from 25 feet to 20 feet, a 50 percent density bonus, and a 50 percent parking reduction, to permit the construction of an apartment complex. In conjunction with a rezoning to C-3 (Commercial) with an allowed density of twenty-eight units, the infill special permit would allow 42 units. Thirty-nine units are proposed in total. The property is currently occupied by an existing apartment complex of 11 units inclusive of one studio, eight one-bedroom, and two two-bedroom

units. The additional 28 units are inclusive of 12 studio, 14 one-bedroom, and two two-bedroom units. The development requires 54 parking spaces and proposes 30, to include required bicycle and ADA accessible spaces. Access to the property is proposed from Edgar Road.

### **Planning and Inspections Department – Planning Division Recommendation**

The Planning Division recommends **approval** of the request as the proposed development is consistent with the existing multifamily housing on the subject and surrounding properties and is compliant with the G-3 Post-War land use designation in the Northwest Planning Area. Further, the property meets the requirements of Section 20.04.320, Special Permit Approvals, Section 20.10.280, Infill Development, and 20.04.150 Detailed Site Development Plan.

### **Plan El Paso-Future Land Use Map Designation**

All applications for special permit shall demonstrate compliance with the following criteria:

G-3 – Post War: This sector applies to transitional neighborhoods typically developed from the 1950s through the 1980s. Streets were laid out with curvilinear patterns without alleys and shopping centers are located at major intersections behind large parking lots. This sector is generally stable but would benefit from strategic suburban retrofits to supplement the limited housing stock and add missing civic and commercial uses.

The purpose of the R-3 (Residential) district is to provide a low density of dwelling units supporting a suburban-urban interface that permits developments utilizing varying lot configurations, permit primarily single-family and two-family residential areas, and recreational and institutional uses incidental to and serving the neighborhood.

The purpose of the C-3 (Commercial) district is to provide goods or rendering services which are used in support of the community's trade and service establishments and serving multi-neighborhoods. The district permits intensities designed to be compatible with each other and to provide for a wide range of types of commercial activity, including light automobile related uses.

### **ANALYSIS**

To grant the special permit to allow for infill development, the applicant must comply with the following standards, per Section 20.10.280, Infill Development:

A. Location Criteria. An infill development may be designated for any property on which at least two of the following factors are present: the property is wholly or partially located within a designated tax increment financing district, or the property is wholly or partially located within a designated state or federal enterprise zone, or the property is wholly or partially located within an empowerment zone, or the property is wholly or partially located within a designated redevelopment area pursuant to Chapter 20.14 of this title, or the property is located within a designated historic district, or the property is within an older neighborhood of the city. An older neighborhood of the city defined as a legally recorded and developed subdivision for at least thirty years. Where an infill development is able to satisfy only one of the preceding factors, an applicant shall be allowed to make a formal request to city council to waive the two factor requirement prior to the submission of a special use permit application for the property. In all instances where a waiver is requested and authorized by city council, at least one location factor shall be met. For purposes of this section, any property with a historic designation shall be subject to the requirements and review provisions of Chapter 20.20 (Historic Designations) of this title, and shall not be waived by any provision of this section.

*The property is in a state enterprise zone and fulfills one of the two criteria for infill development. The Cudahy-Locke subdivision was originally platted in August 2014 (see Attachment 5). On December 9, 2014, City Council passed a resolution waiving the two criteria minimum for this property.*

B. Use Regulations. Unless the ordinance designating the infill development provides otherwise, a proposed infill development may be approved for any use permitted in the base-zoning district in which it is located. However, the ordinance designating an infill development overlay may provide a list of

principal uses, accessory uses and prohibited uses pursuant to a specific area plan adopted by the city council.

*Apartments are a permissible use in the C-3 (Commercial) zoning district.*

C. Setback Provisions. The side, front and rear setback requirements of the base-zoning district on which it is located may be reduced up to one hundred percent for an infill development as approved by city council. Buildings should be designed to relate to and take advantage of any existing site attributes, and shall be a consideration for reduction of the setback requirements.

C-3 Apartment Setback Reduction Request		
	Required	Proposed
Rear Yard Setback	25 feet	20 feet

D. Parking. The minimum parking requirements enumerated in Chapter 20.14 (Off-Street Parking and Loading Requirements) of this title shall be automatically reduced by fifty percent for any use within a designated infill development.

*The proposed development requires 54 parking spaces and proposes 30, a 44 percent reduction in the required parking. The applicant has requested a 50 percent reduction.*

E. Design. Unless otherwise approved by city council, any construction permitted pursuant to this section shall be designed to consistently relate to the massing and character of the surrounding properties. Consistency of massing and character shall be determined as shown on the site plan with typical elevations and proposed construction materials, that the proposed construction is compatible with the overall design features and building development of the neighborhood within which the proposed infill development is located. Design features include, but shall not be limited to, building height, architectural style, building materials, landscape and setbacks.

*The proposed development is consistent with the G-3 Post-War growth sector.*

#### **COMMENTS:**

##### **Planning and Inspections Department – Planning Division - Transportation**

No objections.

Note: All existing / proposed paths of travel (accessible sidewalks, wheelchair access curb ramps and driveways) within public rights-of-way shall be in compliance with current ADA/TAS rules and regulations and the current City of El Paso Design Standards for Construction.

##### **Planning and Inspections Department - Land Development**

No objection.

##### **Planning and Inspections Department – Plan Review**

No objections to proposed special permit. At the time of submittal for building permits the project will need to comply with all applicable provisions of the IBC, TAS and local municipal code.

##### **Planning and Inspections Department - Landscaping**

No objection. Landscape required will be based on 15 % of the new construction.

##### **El Paso Fire Department**

Recommend “APPROVAL with Conditions” of “Application” as presented. PZST14-00036. Applicant shall provide an access walkway from the apparatus access roads to the exterior of all buildings shown on the proposed site plan. \*\*\*\*\*NOTE \*\*\*\*\* In accordance with the requirements of the Zoning Code

Section 20.04.160 Content of application the Fire Planning Division has reviewed the submitted “Detailed Site Plan for the following: Elevations, Perspective of the building, Dimensions, square footage and height of all structures, Number of dwelling units in Multi- family structures, and Driveways as applicable to the following sections of the fire code; Chapter 5 Fire Service Features, and Appendix D Fire Apparatus Access Roads, Please note: Fire Protection Systems are not being reviewed at this time “When required as per section 905.3.1, 905.4 and 905.5 all fire protections system plans shall be submitted separately to Fire Plan Review for further requirements and comments”. The Fire Planning Division has reviewed the submitted “Detailed Site Plan Application” as per requirements of the Zoning Code Section 20.04.160 Content of application and has determined that the submission DOES comply within the zoning regulations.

### **El Paso Water Utilities**

EPWU does not object to this request.

1. Doniphan Drive is a Texas Department of Transportation (TxDOT) right-of-way. All proposed water and sanitary sewer work to be performed within Doniphan Drive right-of-way requires written permission from TxDOT.

#### **Water:**

1. There is an existing 16-inch diameter water main extending along Doniphan Drive, the water main is located approximately 45-ft east from the center right-of-way line.
2. There is an existing 6-inch diameter water main extending along Johannson Road that is available for service, the water main is located approximately 19-ft east from the center right-of-way line.
3. EPWU records indicate a 1-1/2-inch water meter serving the subject property. The service address for this meter is 5888 Doniphan Drive.

#### **Sewer:**

1. There is an existing 21-inch diameter sanitary sewer main extending along a 25-foot utility easement within the subject property. Said main is located approximately 10-ft east from the western property line. No direct service connections are allowed to this main as per the El Paso Water Utilities – Public Service Board Rules and Regulations.
2. There is an existing 8-inch diameter sanitary sewer main extending along Johannson Road that is available for service, the sewer main is located approximately 5-ft west from the center right-of-way line.
3. The EPWU recommends that grading for Lots 1 and 2 be directed toward Edgar Road to allow sewer service by gravity.

#### **General:**

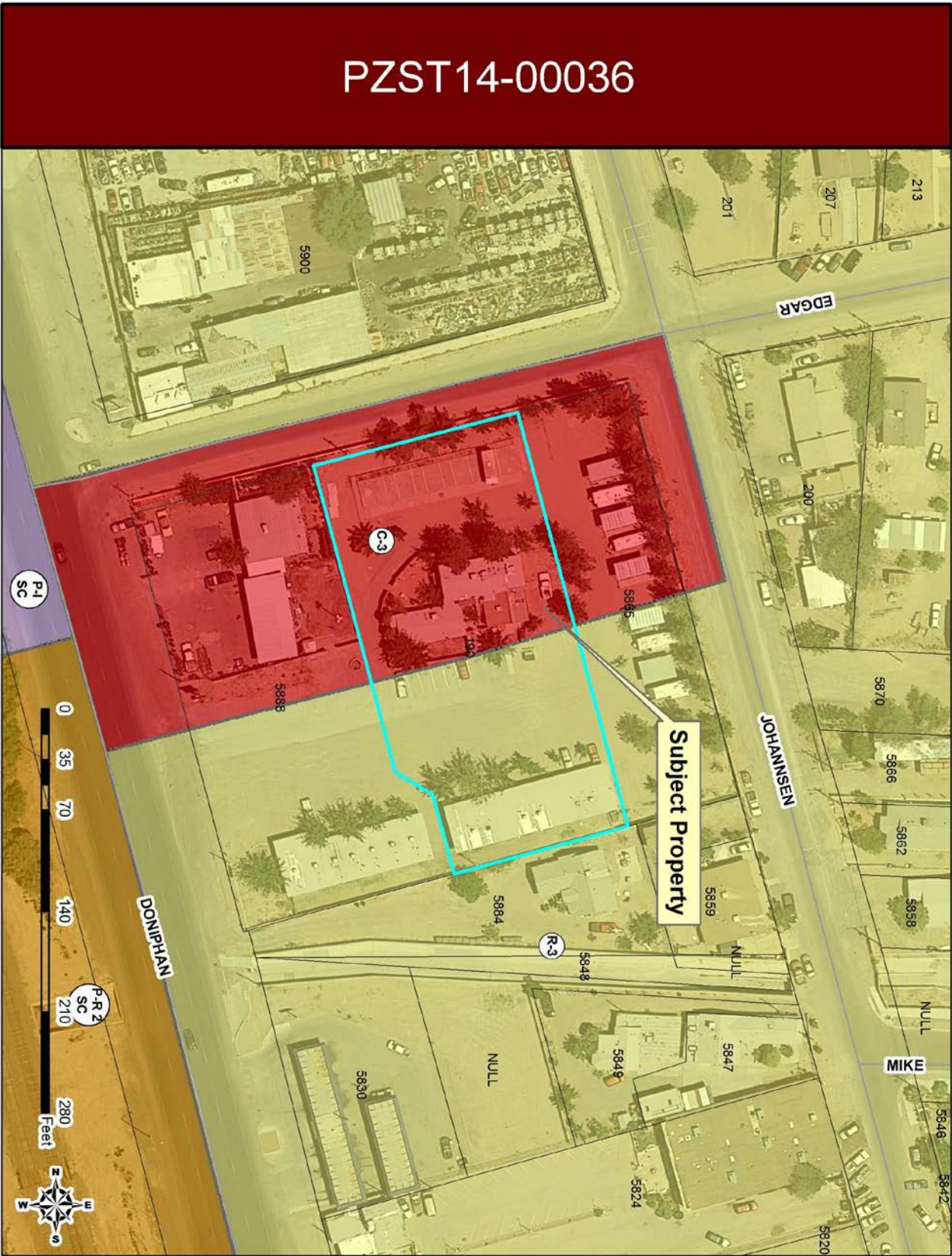
1. No building, reservoir, structure or other improvement, other than asphaltic paving (HMAC), shall be constructed or maintained on the above referenced EPWU-PSB easement without the written consent of EPWU-PSB. The Developer shall refrain from constructing rock walls, signs, buildings, or any structure that will interfere with the access to the PSB easements. There shall be at least 5-foot setback from the easement line to any sign or structure.
2. EPWU requires a new service application to provide service to the property. New service applications are available at 1154 Hawkins, 3rd floor and should be made 6 to 8 weeks in advance of construction to ensure water for construction work. A site plan, utility plan, grading and drainage plans, landscaping plan, the legal description of the property and a certificate-of-compliance are required at the time of application. Service will be provided in accordance with the current EPWU – PSB Rules and Regulations. The applicant is responsible for the costs of any necessary on-site and off-site extensions, relocations or adjustments of water and sanitary sewer lines and appurtenances.

### **Attachments**

1. Zoning Map
2. Aerial Map
3. Detailed Site Development Plan
4. Elevations
5. Plat of Cudahy-Locke Subdivision



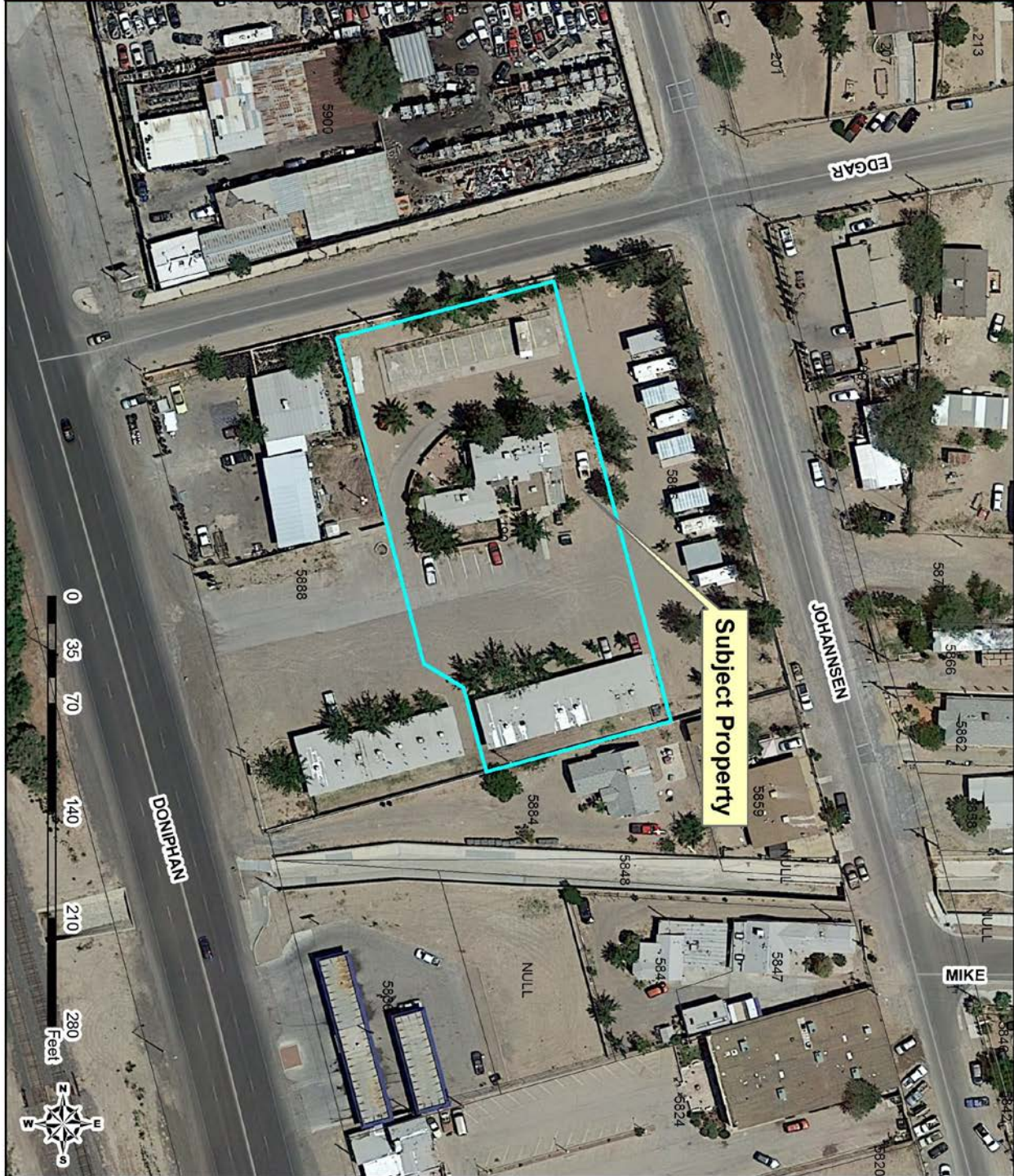
ATTACHMENT 1: LOCATION MAP





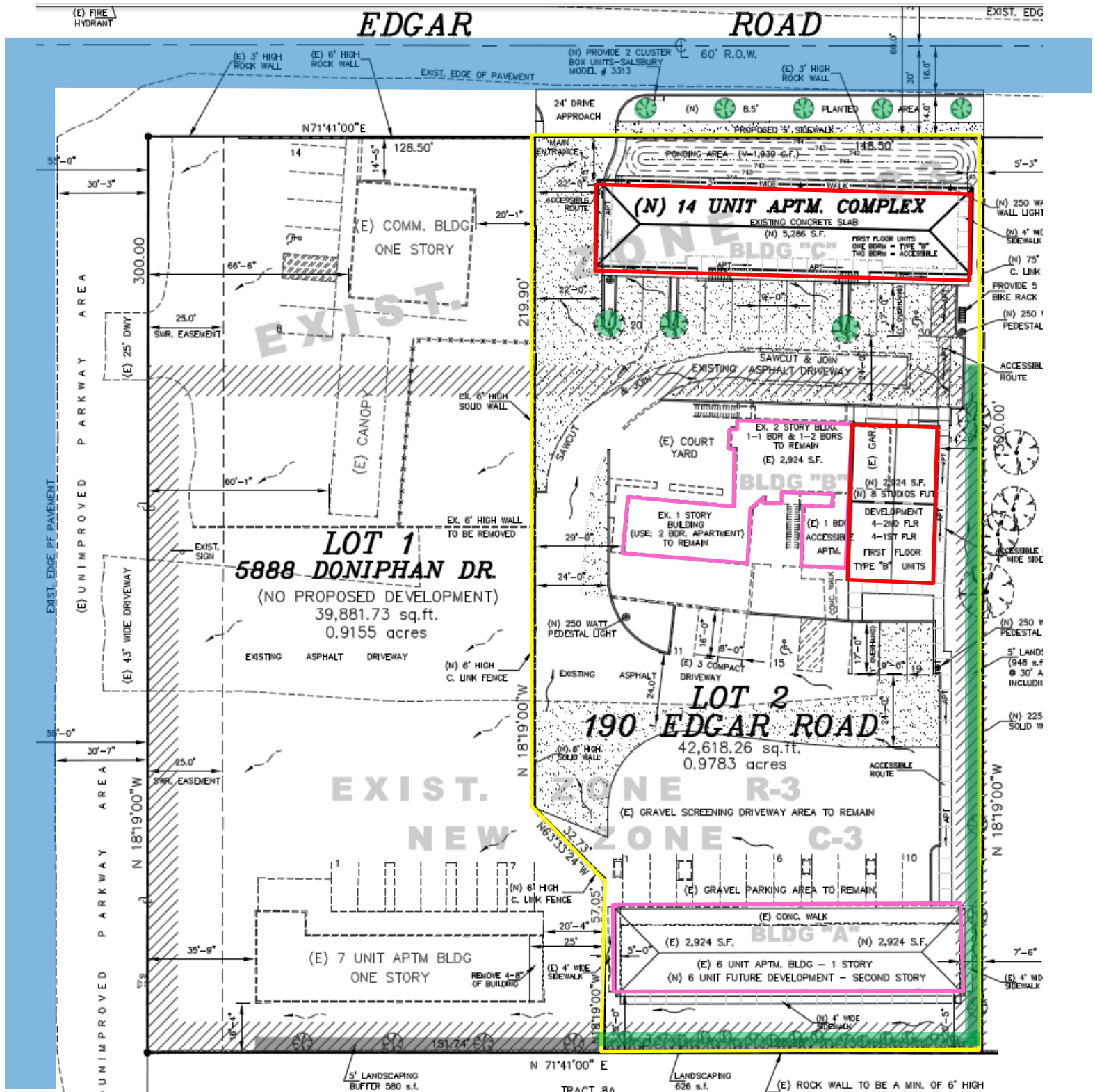
ATTACHMENT 2: AERIAL MAP

PZST14-00036

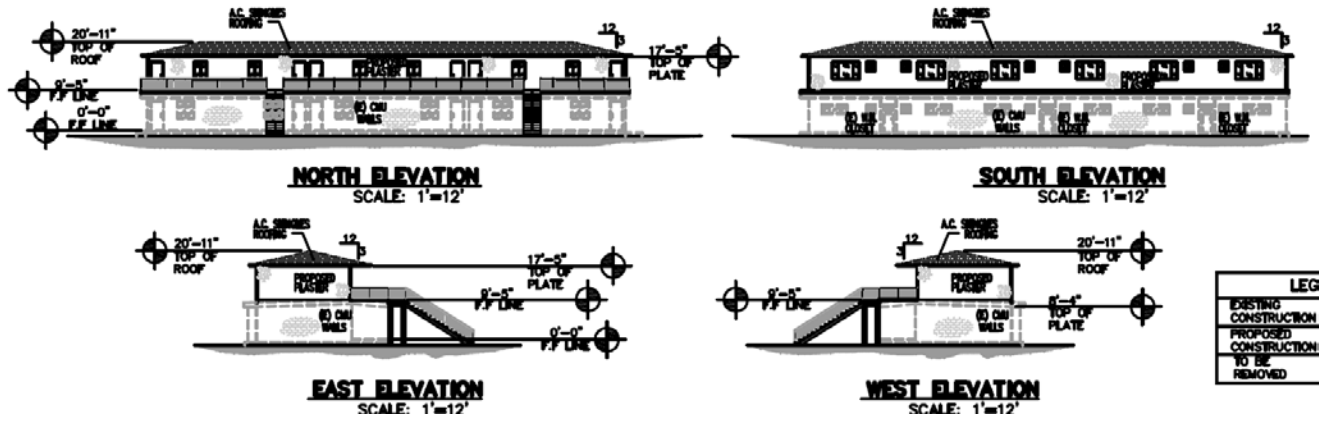




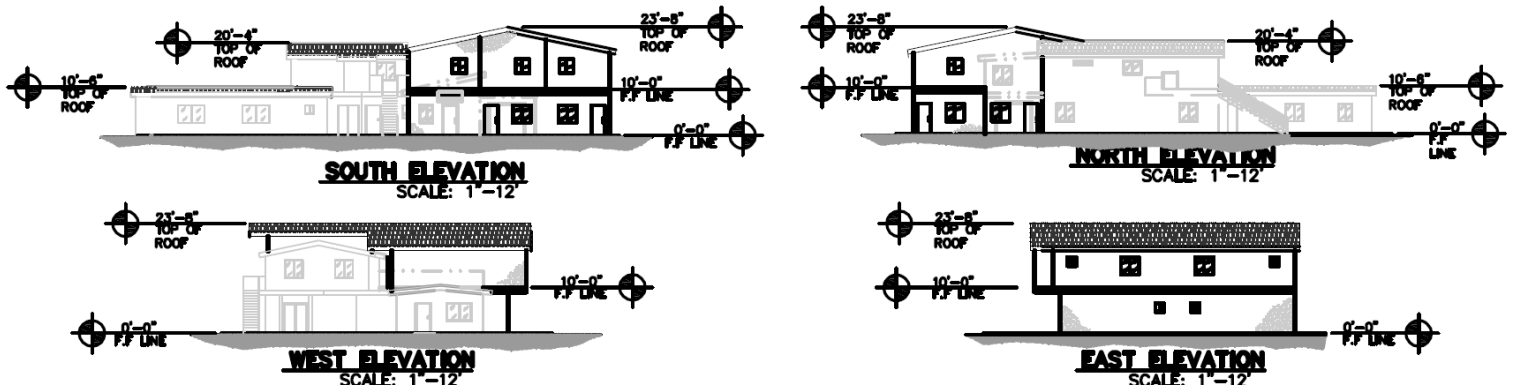
## ATTACHMENT 3: DETAILED SITE DEVELOPMENT PLAN



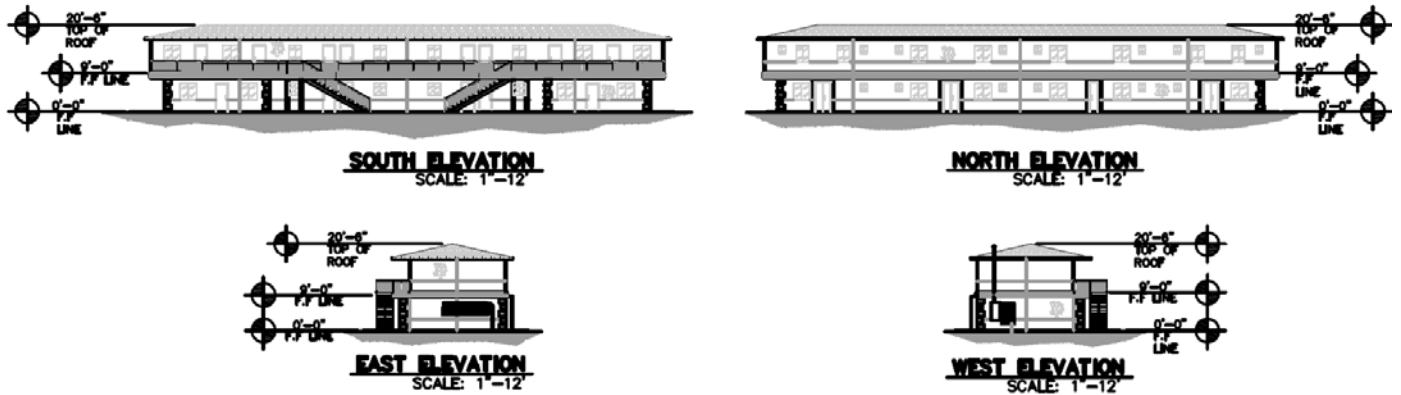
## ATTACHMENT 4: ELEVATIONS



Existing Building "A"



Existing Building "B"



Proposed Building "C"





## **Recommendation/Public Input**

- Planning Division recommendation: Approval
- CPC Vote: Approval Recommendation (7-0)
- Public Input: 1 Phone call and 1 letter in support were received for the rezoning and special permit.

### **Strategic Goal #3 Promote the Visual Image of El Paso**

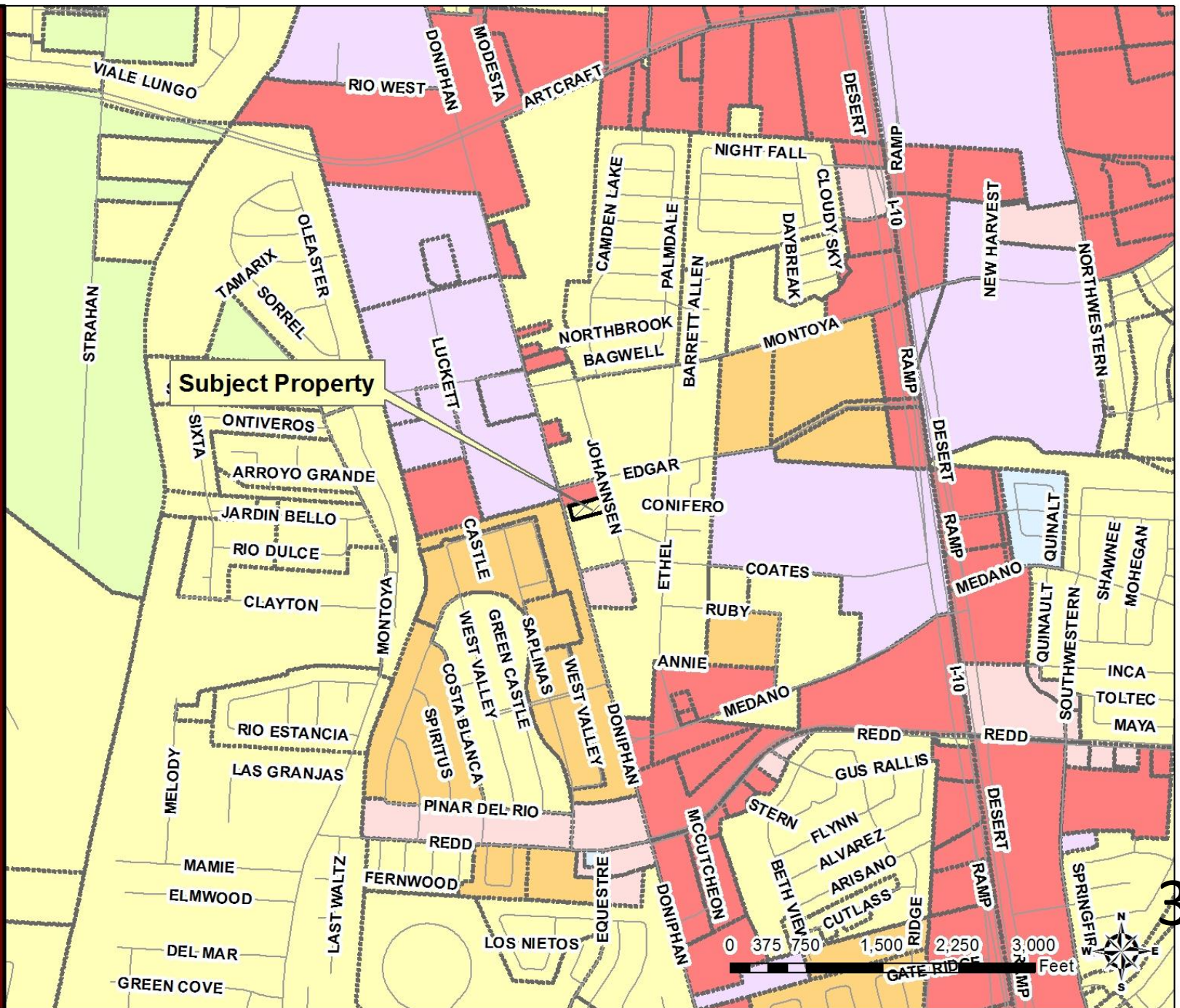
- 3.1 Provide business friendly permitting and inspection processes
- 3.2 Improve the visual impression of the community

PZRZ14-00063 & PZST14-00036





PZRZ14-00063 & PZST14-00036





PZRZ14-00063 & PZST14-00036





PZRZ14-00063 & PZST14-00036

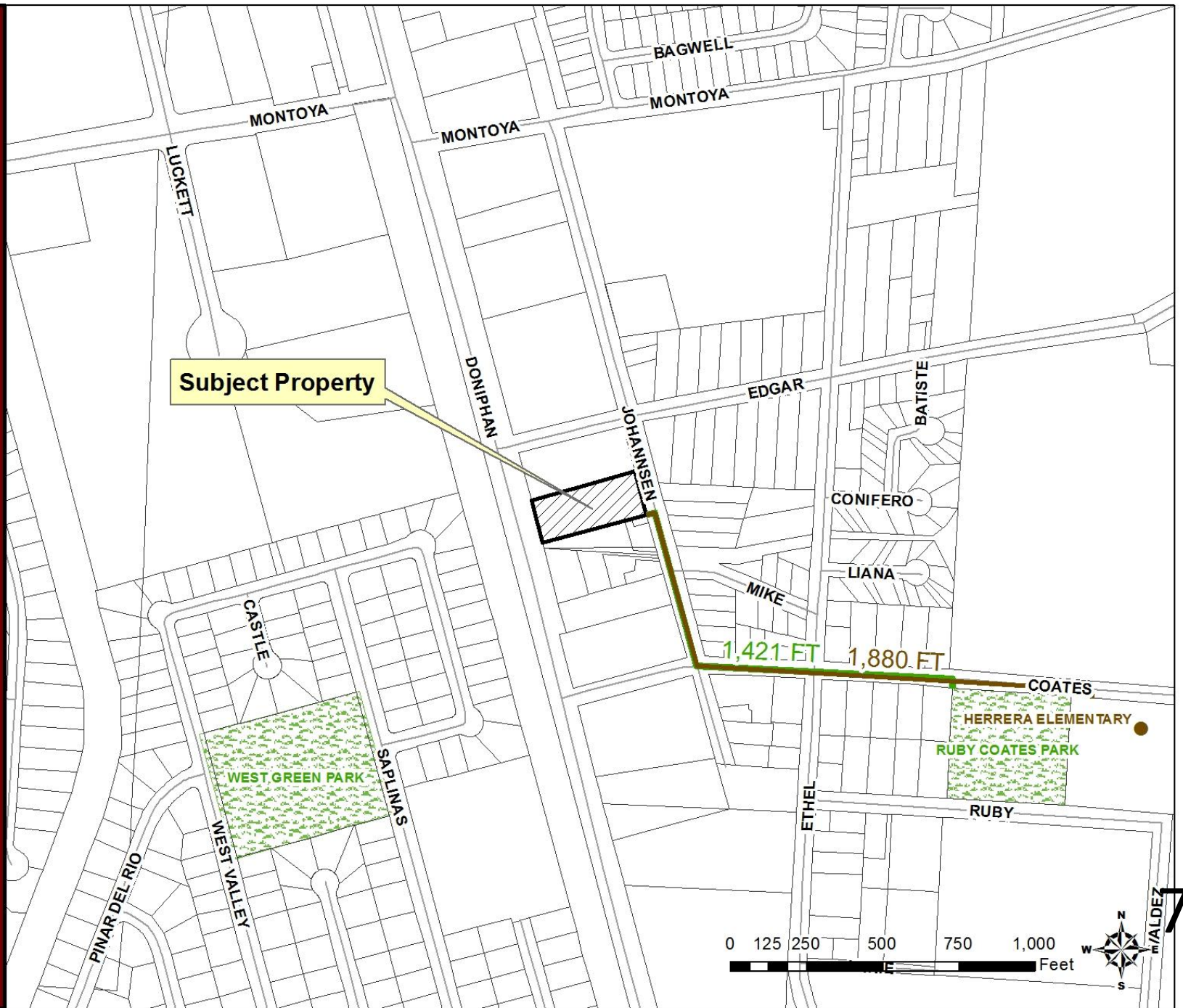




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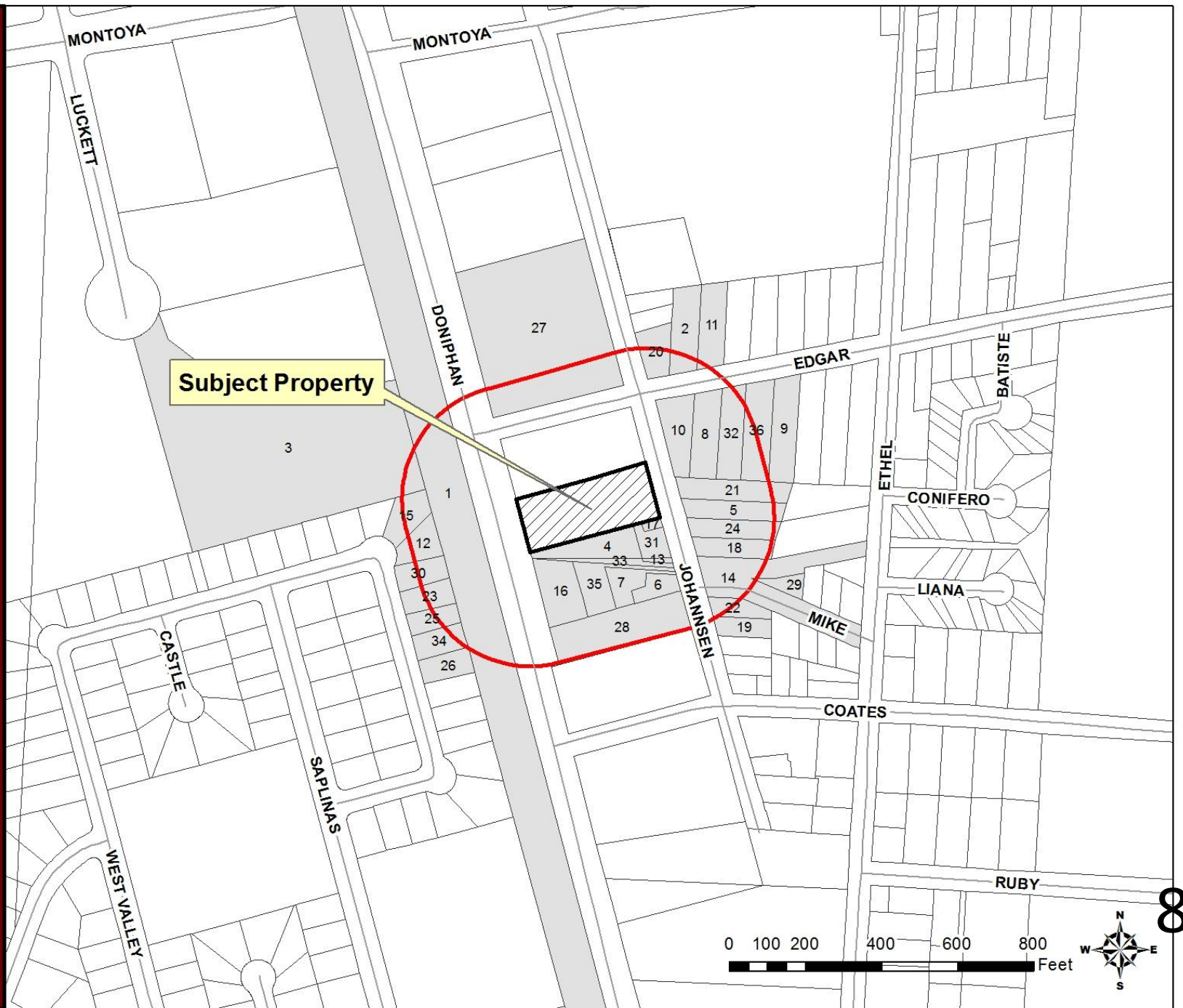


PZRZ14-00063 & PZST14-00036





PZRZ14-00063 & PZST14-00036



[illegible]

The site plan is divided into two main sections: the northern portion along Edgar Road and the southern portion along Doniphan Dr.

**Edgar Road Section (North):**

- Lot 1 (5888 Doniphan Dr.):** A rectangular lot with a width of 300.00 feet and a depth of 219.90 feet. It contains an existing one-story commercial building (E) COMM. BLDG. and a canopy (E) CANOPY. The lot is bordered by an existing 6-foot high solid wall (EX. 6' HIGH SOLID WALL) and a 6-foot high chain-link fence (EX. 6' HIGH C. LINK FENCE). The lot is zoned R-3 and is currently undeveloped.
- Lot 2 (190 Edgar Road):** A rectangular lot with a width of 181.90 feet and a depth of 181.90 feet. It contains an existing one-story apartment building (EX. 1 STORY BLDG.) and a two-story apartment building (EX. 2 STORY BLDG.). The lot is bordered by an existing 6-foot high solid wall (EX. 6' HIGH SOLID WALL) and a 6-foot high chain-link fence (EX. 6' HIGH C. LINK FENCE). The lot is zoned R-3 and is currently undeveloped.

**Doniphan Dr. Section (South):**

- Lot 1 (5888 Doniphan Dr.):** A rectangular lot with a width of 300.00 feet and a depth of 219.90 feet. It contains an existing one-story commercial building (E) COMM. BLDG. and a canopy (E) CANOPY. The lot is bordered by an existing 6-foot high solid wall (EX. 6' HIGH SOLID WALL) and a 6-foot high chain-link fence (EX. 6' HIGH C. LINK FENCE). The lot is zoned R-3 and is currently undeveloped.
- Lot 2 (190 Edgar Road):** A rectangular lot with a width of 181.90 feet and a depth of 181.90 feet. It contains an existing one-story apartment building (EX. 1 STORY BLDG.) and a two-story apartment building (EX. 2 STORY BLDG.). The lot is bordered by an existing 6-foot high solid wall (EX. 6' HIGH SOLID WALL) and a 6-foot high chain-link fence (EX. 6' HIGH C. LINK FENCE). The lot is zoned R-3 and is currently undeveloped.

**Other Features:**

- Edgar Road:** A 60-foot wide road with a 24-foot drive approach and a 36-foot wide sidewalk. It is bordered by a 3-foot high rock wall (E) 3' HIGH ROCK WALL and a 6-foot high rock wall (E) 6' HIGH ROCK WALL.
- Doniphan Dr.:** A 30-foot wide road with a 24-foot drive approach and a 36-foot wide sidewalk. It is bordered by a 3-foot high rock wall (E) 3' HIGH ROCK WALL and a 6-foot high rock wall (E) 6' HIGH ROCK WALL.
- Landscaping:** A 5-foot landscaping buffer (5' LANDSCAPING BUFFER 580 s.f.) is shown along the southern boundary of the site.
- Other Notes:** The plan includes various notes regarding existing conditions, proposed developments, and zoning requirements. For example, "EXIST. 6' HIGH SOLID WALL TO BE REMOVED" and "PROVIDE 5 BIKE RACKS" are noted.



[illegible]

Existing

Proposed

**NORTH ELEVATION**  
SCALE: 1"=12'

**SOUTH ELEVATION**  
SCALE: 1"=12'

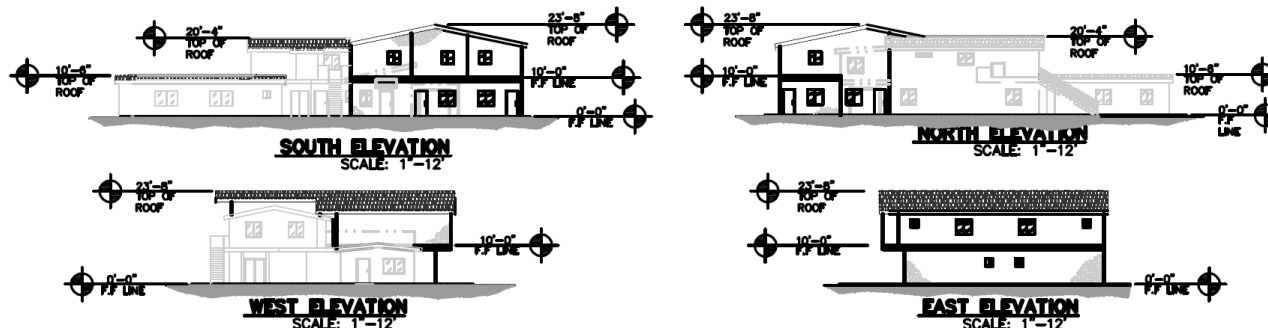
**EAST ELEVATION**  
SCALE: 1"=12'

**WEST ELEVATION**  
SCALE: 1"=12'

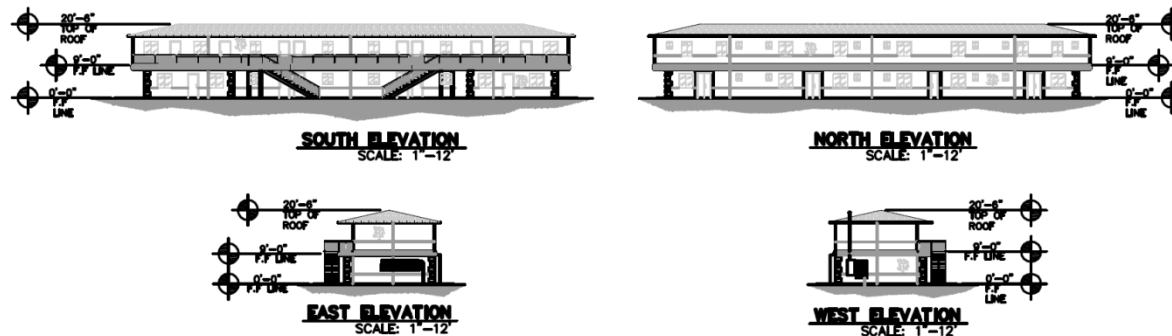
LEGEND:

- EXISTING CONSTRUCTED
- PROPOSED CONSTRUCTED
- TO BE REMOVED

## Existing Building “A”



## Existing Building “B”



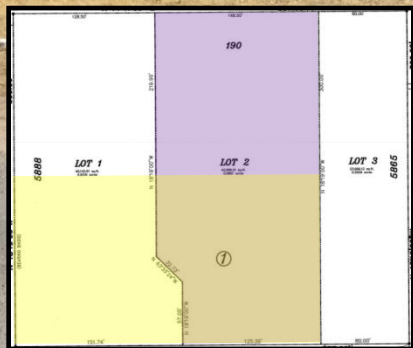
### Proposed Building “C”



RIO GRANDE



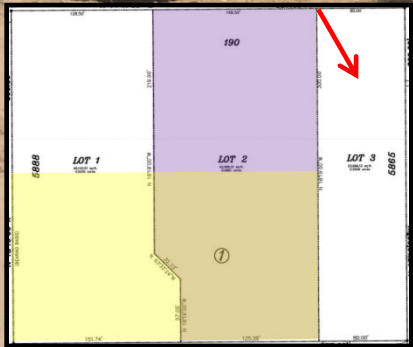




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East

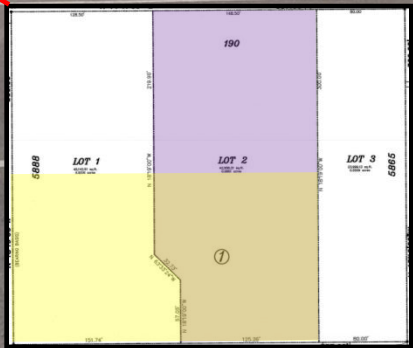




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East

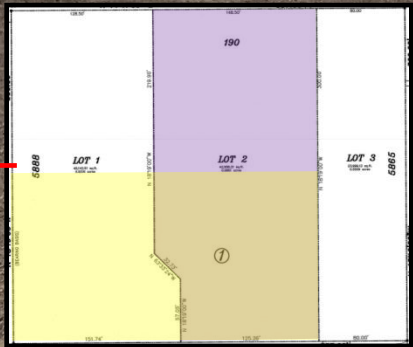




16

West

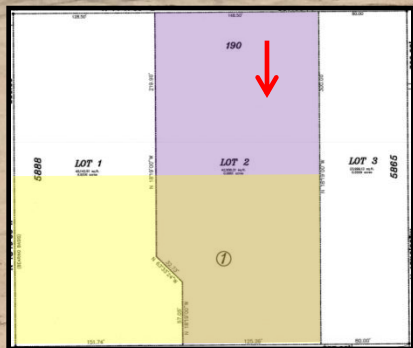




17

West





18

Subject Property & South

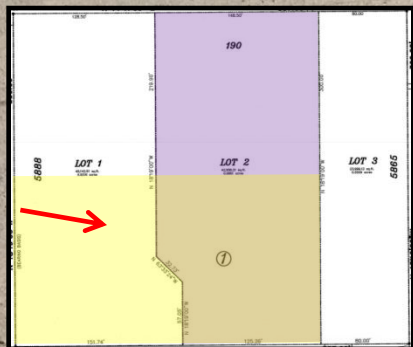




19

Subject Property & South

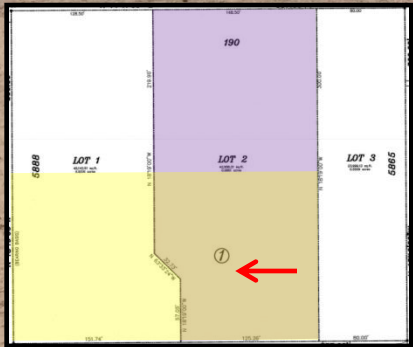




20

Subject Property & West

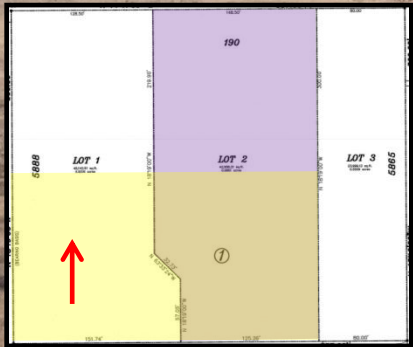
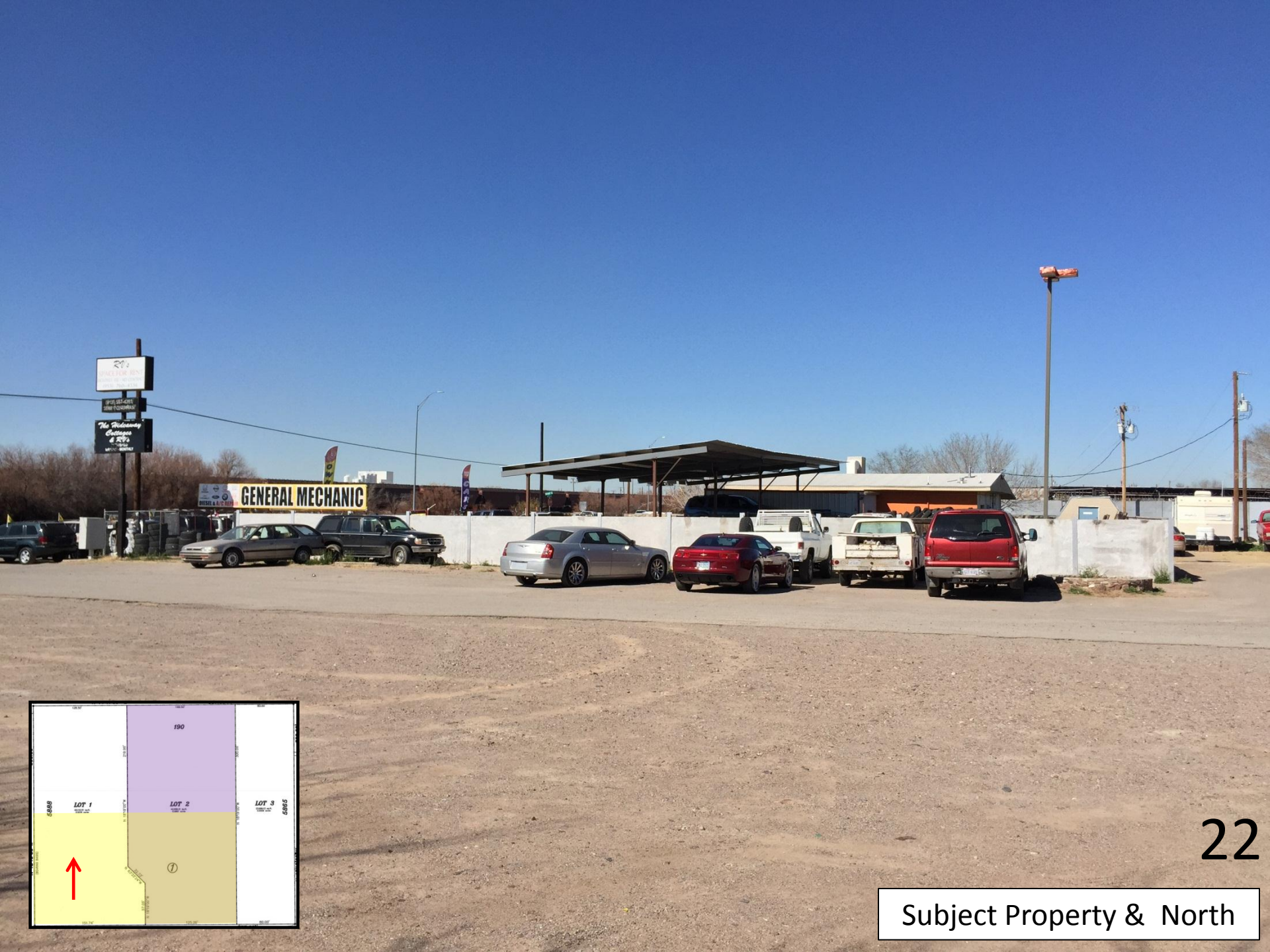




21

Subject Property & East





PZRZ14-00063 & PZST14-00036

