

AIRPORT LAND USE COMMISSION

FOR ORANGE

COUNTY

3160 Airway Avenue • Costa Mesa, California 92626 • 949.252.5170 fax: 949.252.6012

AGENDA ITEM I

June 18, 2020

TO: Commissioners/Alternates

FROM: Lea Choum, Executive Officer

SUBJECT: City of Costa Mesa Request for Consistency Review of the One Metro West

Mixed-Use Development at 1683 Sunflower Avenue

Background

The proposed project would redevelop an existing 15.23-acre industrial project site with a new mixed-use project that includes 1,057 residential units, 25,000 square feet of commercial office space, and 6,000 square feet of retail space. The development would include three seven-story residential buildings with parking structures, one three-story office building, and 1.5 acres of public and private open space.

The proposed site is located at 1683 Sunflower Avenue just north of the 405 Freeway and west of the South Coast Collection (SOCO) retail center. There are industrial uses to the west. (See Attachment 1 for the Project Location Map and Proposed Site Plan). The property is currently developed with a single-story industrial building of approximately 345,000 square feet in size, and 31 feet in height, with an associated parking lot and landscaping. The building is currently occupied with industrial, warehouse and distribution uses.

The project is being referred to your Commission because of the project's location within the Airport Planning Area for John Wayne Airport and because the project requires a General Plan Amendment and Zone Change. The General Plan Amendment that would change the property's current Industrial Park land use designation to High-Density Residential, would allow for 80 dwelling units per acre. The Zone Change would rezone the property from Industrial Park (MP) to Planned Development Residential High-Density (PDR-HD).

The City of Costa Mesa has scheduled the following public meetings/hearings on the proposed project:

May 11, 2020 - Planning Commission (recommended approval)

June 16, 2020 - City Council Informational Meeting

July 7, 2020 - City Council Public Hearing (tentative)

AELUP Issues

The project has been evaluated for conflicts with respect to aircraft noise, building heights, and safety zones.

Regarding Aircraft Noise Impacts

The proposed project is not located within the JWA 60 or 65 CNEL noise contours (see Attachment 2), therefore, no noise attenuation measures are required.

Regarding Height Restrictions

In Section 2.1.3 of the AELUP for JWA, the Commission has incorporated the standards for height limits for determining obstructions and has incorporated the definitions of "imaginary surfaces" for airports as defined in Federal Aviation Regulations (FAR) Part 77. The proposed project is located outside the FAR Part 77 Obstruction Imaginary Surfaces for JWA as shown on Attachment 3.

The proposed project is located within the AELUP Notification Area for JWA (see Attachment 4). The proposed maximum height for the project is 132 feet above mean sea level (AMSL) which does not penetrate the notification surface of 246 feet AMSL. The project applicant filed Form 7460-1 with the Federal Aviation Administration (FAA) and has received a Determination of No Hazard to Air Navigation. The FAA Aeronautical Study No. 2020-AWP-5224-OE is included as Attachment 5.

Regarding Safety Zones

Attachment 6 contains the Safety Zones exhibit showing that the proposed project site is not within the safety zone areas for JWA.

Heliports

Heliports are not proposed as part of project, therefore no analysis of Heliports was conducted. The City of Costa Mesa General Plan includes language that states proposed heliport projects must comply with FAA Regulations, Caltrans Division of Aeronautics and the AELUP for Heliports in the development of heliports.

Environmental Compliance

A Draft Environmental Impact Report (DEIR) was prepared as the CEQA documentation to analyze the potential impacts of the project. ALUC Staff provided comments on the Notice of Preparation (NOP) on June 20, 2019. The letter is included as Attachment 7 for your information.

Conclusion

Attachment 8 to this report contains excerpts from the project submittal package received from the City of Costa Mesa for your reference. The proposed project is not located within the noise contours or safety zones for JWA and does not penetrate the notification or the obstruction imaginary surfaces for JWA, and the proposed project does not include a heliport.

Recommendation:

1. That the Commission find the proposed One Metro West mixed-use project and related General Plan Amendment and Zoning Code Change consistent with the AELUP for John Wayne Airport.

Respectfully submitted,

Lea U. Choum Executive Officer

Attachments:

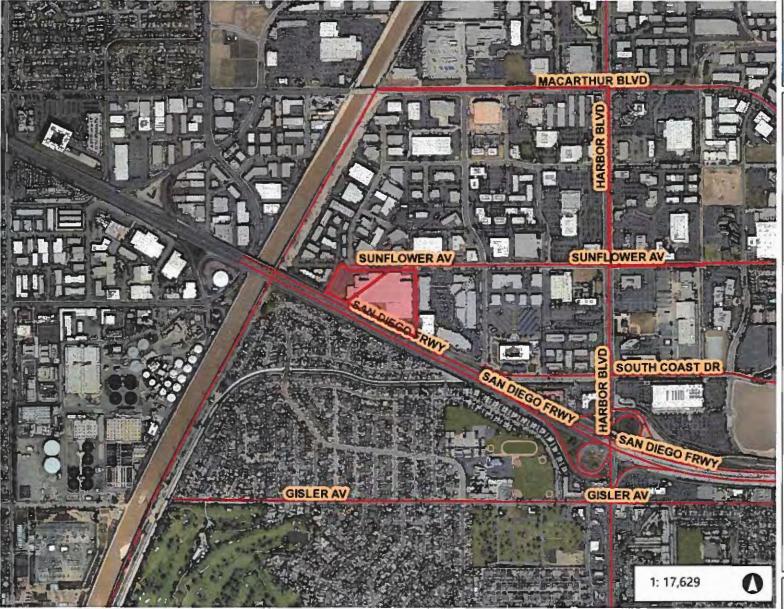
1. Project Location and Zoning Maps

Lea U. Chon

- 2. JWA CNEL Contours
- 3. FAR Part 77 JWA Obstruction Imaginary Surfaces
- 4. FAR Part 77 AELUP Notification Area for JWA
- 5. FAA Aeronautical Study No. 2020-AWP-5224-OE
- 6. JWA Airport Safety Zone Reference Map
- 7. ALUC Comment Letter on NOP
- 8. Submittal Package Excerpts from City of Costa Mesa



1683 Sunflower Avenue - Vicinity Map





Legend

Costa Mesa

Notes

WGS_1984_Web_Mercator_Auxiliary_Sphere City of Costa Mesa

0.6

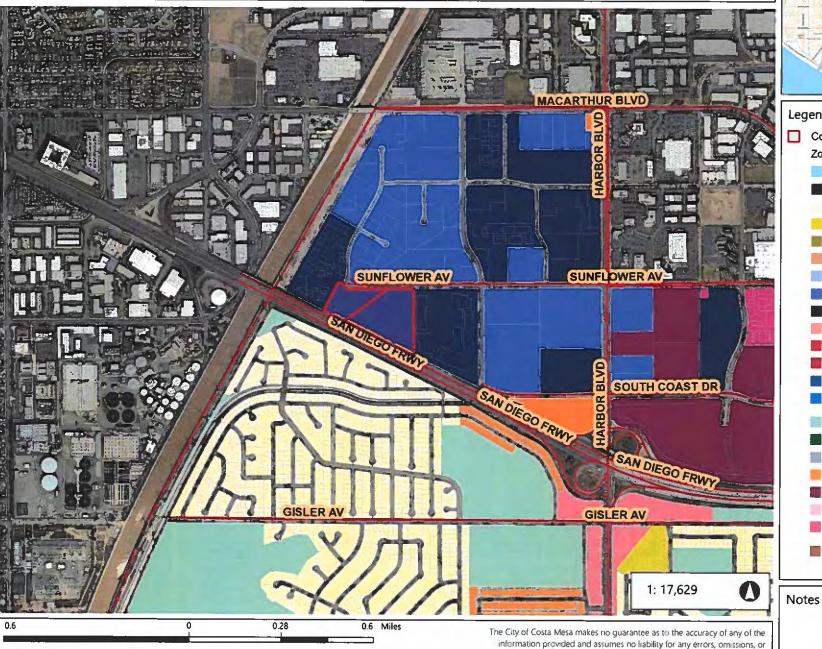
The City of Costa Mesa makes no guarantee as to the accuracy of any of the information provided and assumes no liability for any errors, omissions, or



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© City of Costa Mesa

1683 Sunflower Avenue - Zoning Map

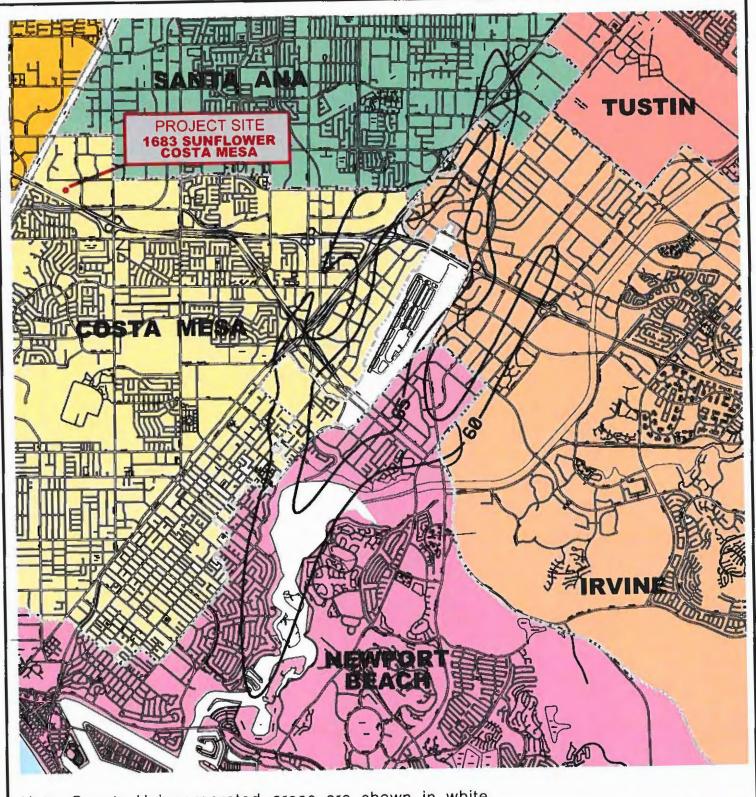




Legend

- Costa Mesa Zoning
 - AP Administrative Professional
 - IR-MLT Institutional Recreational I
 - R1 Single-Family Residential
 - R2-MD Multiple-Family Residentia
 - R2-HD Multiple-Family Residentia
 - R3 Multiple Family Residential
 - MG General Industrial
 - MP Industrial Park
 - PDI Planned Development Industr
 - C1 Local Business
 - C2 General Business
 - C1-S Shopping Center

 - TC Town Center
 - PDR-NCM Planned Development
 - I&R Institutional Recreactional
 - I&R-S Institutional Recreational 5
 - P Parking
 - CL Commercial Limited
 - PDC Planned Development Comn
 - PDR-LD Planned Development Rr
 - PDR-MD Planned Development R
 - PDR-HD Planned Development R



Note: County Unincorporated areas are shown in white.

John Wayne Airport Impact Zones

LEGEND

Composite contour from John Wayne Airport Project Case-1990 and 2005 (see section 2.2.1)





-65- CNEL CONTOUR

---- RUNWAY PROTECTION ZONE

---- CITY BOUNDARIES

- AIRPORT BOUNDARIES

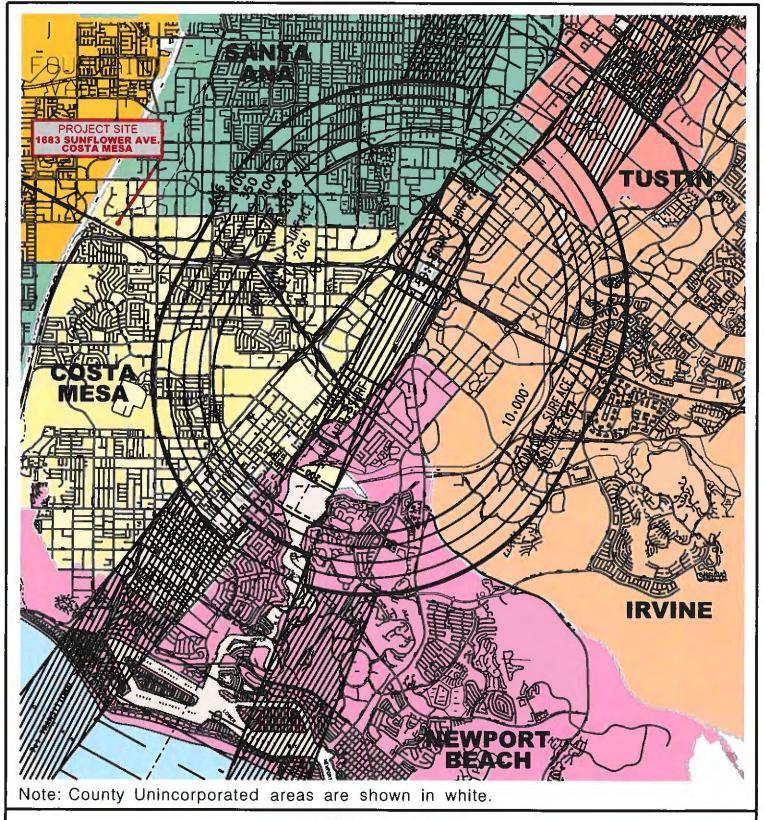
CERTIFICATION

Adopted by the Airport Land Use Commission for Orange County

Lea Choum, Executive Officer

Date

AELUP-2007/Jwoipzone-07(3175AirwoyCostaMesa).dgn



FAR PART 77 John Wayne Airport Obstruction Imaginary Surfaces



LEGEND

---- CITY BOUNDARIES
---- AIRPORT BOUNDARIES

CERTIFICATION

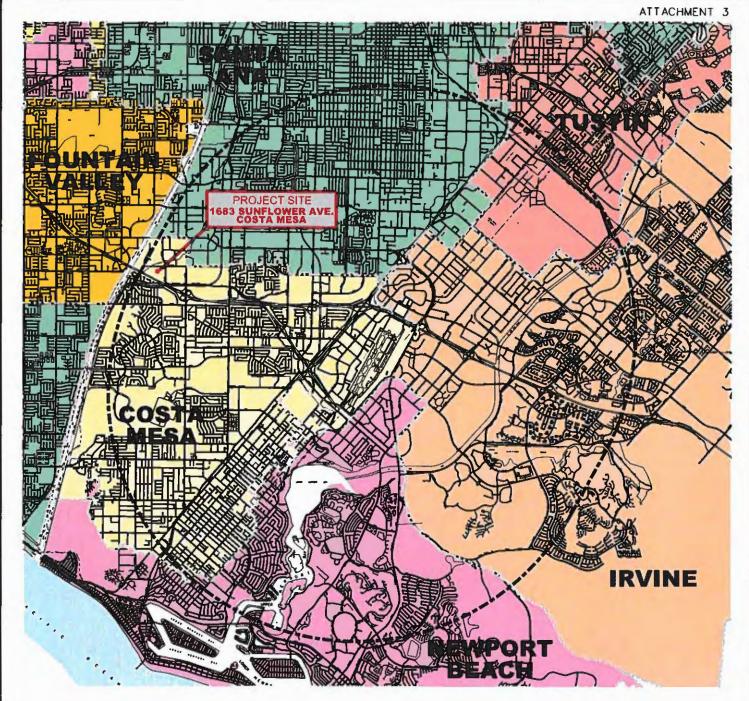
Adopted by the Airport Land Use Commission for Orange County

Lea choum, Executive Officer

Date

AELUP-2007/jwahsurface-07(1683SunflowerCostaMesa).dgn

AELUP Notification Area for JWA



Note: County Unincorporated areas are shown in white.

FAR PART 77

Notification Area for John Wayne Airport: 20,000' Radius at 100:1 Slope



LEGEND

--- 20,000'Radius

---- CITY BOUNDARIES

AIRPORT BOUNDARIES

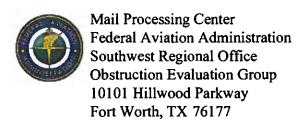
CERTIFICATION

Adopted by the Airport Land Use Commission for Orange County

Kari A. Rigoni, Executive Officer

Date

AELUP-2007/Jwanotf-07(1683Sunflower_CastaMesa).dgn



Issued Date: 05/19/2020

Brent Stoll Rose Equities 8383 Wilshire Blvd Suite 632 Beverly HIlls, CA 90211

** DETERMINATION OF NO HAZARD TO AIR NAVIGATION **

The Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure: Building One Metro West

Location: Costa Mesa, CA

Latitude: 33-41-40.80N NAD 83

Longitude: 117-55-44.80W

Heights: 34 feet site elevation (SE)

98 feet above ground level (AGL) 132 feet above mean sea level (AMSL)

This aeronautical study revealed that the structure does not exceed obstruction standards and would not be a hazard to air navigation provided the following condition(s), if any, is(are) met:

It is required that FAA Form 7460-2, Notice of Actual Construction or Alteration, be e-filed any time the project is abandoned or:

	At least 10 days prior to start of construction (7460-2, Part 1)	
X	Within 5 days after the construction reaches its greatest height (7460-2, Part 2	2)

Based on this evaluation, marking and lighting are not necessary for aviation safety. However, if marking/lighting are accomplished on a voluntary basis, we recommend it be installed in accordance with FAA Advisory circular 70/7460-1 L Change 2.

This determination expires on 11/19/2021 unless:

- (a) the construction is started (not necessarily completed) and FAA Form 7460-2, Notice of Actual Construction or Alteration, is received by this office.
- (b) extended, revised, or terminated by the issuing office.
- (c) the construction is subject to the licensing authority of the Federal Communications Commission (FCC) and an application for a construction permit has been filed, as required by the FCC, within 6 months of the date of this determination. In such case, the determination expires on the date prescribed by the FCC for completion of construction, or the date the FCC denies the application.

NOTE: REQUEST FOR EXTENSION OF THE EFFECTIVE PERIOD OF THIS DETERMINATION MUST BE E-FILED AT LEAST 15 DAYS PRIOR TO THE EXPIRATION DATE. AFTER RE-EVALUATION OF CURRENT OPERATIONS IN THE AREA OF THE STRUCTURE TO DETERMINE THAT NO SIGNIFICANT AERONAUTICAL CHANGES HAVE OCCURRED, YOUR DETERMINATION MAY BE ELIGIBLE FOR ONE EXTENSION OF THE EFFECTIVE PERIOD.

This determination is based, in part, on the foregoing description which includes specific coordinates, heights, frequency(ies) and power. Any changes in coordinates, heights, and frequencies or use of greater power, except those frequencies specified in the Colo Void Clause Coalition; Antenna System Co-Location; Voluntary Best Practices, effective 21 Nov 2007, will void this determination. Any future construction or alteration, including increase to heights, power, or the addition of other transmitters, requires separate notice to the FAA. This determination includes all previously filed frequencies and power for this structure.

If construction or alteration is dismantled or destroyed, you must submit notice to the FAA within 5 days after the construction or alteration is dismantled or destroyed.

This determination does include temporary construction equipment such as cranes, derricks, etc., which may be used during actual construction of the structure. However, this equipment shall not exceed the overall heights as indicated above. Equipment which has a height greater than the studied structure requires separate notice to the FAA.

This determination concerns the effect of this structure on the safe and efficient use of navigable airspace by aircraft and does not relieve the sponsor of compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

If we can be of further assistance, please contact our office at (206) 231-2877, or Nicholas.Sanders@faa.gov. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2020-AWP-5224-OE.

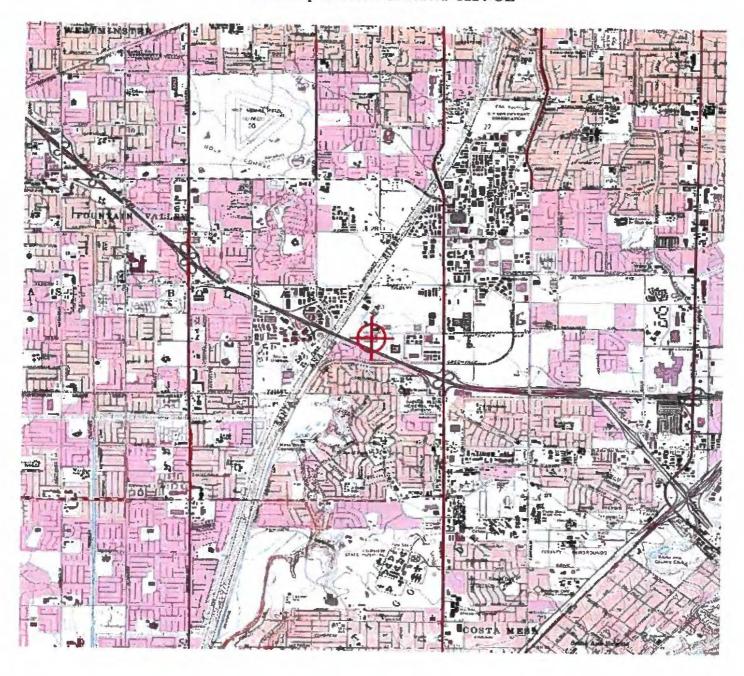
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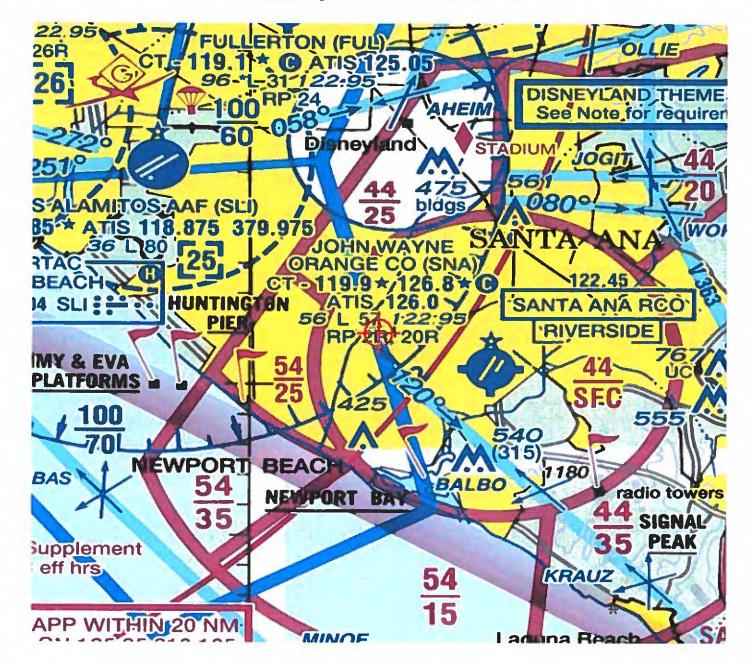
Nicholas Sanders Technician

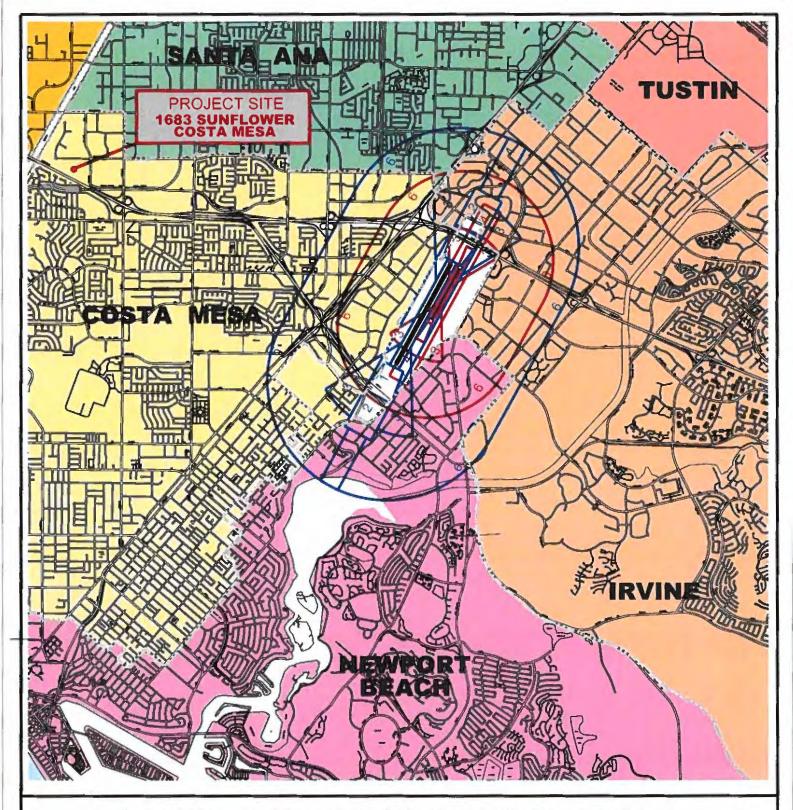
Attachment(s) Map(s)

TOPO Map for ASN 2020-AWP-5224-OE



Sectional Map for ASN 2020-AWP-5224-OE





John Wayne Airport Safety Zone Reference Map

- 1, RUNWAY PROTECTION ZONE
- 2. INNER APPROACH / DEPARTURE ZONE
- 3. INNER TURNING ZONE
- 4. OUTER APPROACH / DEPARTURE ZONE
- 5. SIDELINE ZONE
- 6, TRAFFIC PATTERN ZONE



SAFETY COMPATIBILITY ZONES FOR RUNWAY 2L & 20R (A MEDIUM GENERAL AVIATION RUNWAYAS DESCRIBED IN THE CALIFORNIA AIRPORT LAND USE PLANNING HANDBOOK, JANUARY 2002 EDITION)



SAFETY COMPATIBILITY ZONES FOR RUNWAY 2R & 20L (A SHORT GENERAL AWATION RUNWAY AS DESCRIBED IN THE CALIFORNIA AIRPORT LAND USE PLANNING HANDBOOK, JANUARY 2002 EDITION)

CERTIFICATION

Adopted by the Airport Land Use Commission for Orange County

Lea Choum, Executive Officer

Date



AIRPORT LAND USE COMMISSION

FOR ORANGE

COUNTY

3160 Airway Avenue • Costa Mesa, California 92626 • 949.252.5170 fax: 949.252.6012

June 20, 2019

Minoo Ashabi, Principal Planner City of Costa Mesa Development Services Department 77 Fair Drive Costa Mesa, CA 92626

Subject: NOP of an EIR for One Metro West Project

Dear Ms. Ashabi:

Thank you for the opportunity to review the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the One Metro West Project located at 1683 Sunflower Avenue, Costa Mesa, 92626 in the context of the Airport Land Use Commission's Airport Environs Land Use Plan for John Wayne Airport (JWA AELUP). The proposed project is a mixed-userdevelopment and consists of residential, specialty retail, creative office, and reorgational uses. The project is proposed to include up to 1,057 dwelling units, 25,000 square feet of commercial creative office, 6,000 square feet of specialty retail, and 1.7 acres of open space. The proposed project would also require an amendment to the Gity's General Plan in order to change the existing land use designation from Industrial Park to Urban Genter Commercial.

The proposed project is located within the Federal Aviation Regulation (FAR) Part 77 Notification Area for JWA. We suggest that the EIR discuss the height at which the notification surface would be penetrated compared to the proposed building heights. We recommend that the project proponent utilize the Notice Criterial Tool on the Federal Aviation Administration (FAA) website https://oeaaa.faa.gov/oeaaa/external/protal.jsp to determine if the proposed project penetrates the notification surface and requires filing Form 7460-1 Notice of Proposed Construction or Alternation with the FAA.

A referral by the City to the ALUC may be required for this project due to the location of the proposal within a JWA AELUP Planning Area and due to the nature of the required City approvals (i.e., General Plan Amendment and Zone Change) under PUC Section 21676(b). In this regard, please note that the Commission suggests such referrals be submitted to the ALUC for a determination, between the Local Agency's expected Planning Commission and City Council hearings. Since the ALUC meets on the third Thursday afternoon of each month, submittals must be received in the ALUC office by the first of the month to ensure sufficient time for review, analysis, and agendizing.

ALUC Comments - One Metro West Project June 20, 2019 Page 2

Thank you for the opportunity to comment on this NOP. Please contact me at (949) 252-5123 or via email at lchoum@ocair.com if you need any additional details or information.

Sincerely,

Lea U. Choum Executive Officer

Les U. Chon



CITY OF COSTA MESA

P.O. BOX 1200 • 77 FAIR DRIVE • CALIFORNIA 92628-1200

April 30, 2020

RECEIVED
MAY 0 1 2020

ARPORT LAND USE COMMISSION

Ms. Lea Choum
Executive Officer
AIRPORT LAND USE COMMISSION FOR ORANGE COUNTY
3160 Airway Avenue
Costa Mesa, CA 92626

Sent via email to: Lea Choum, Ichoum@ocair.com

RE: Review of the One Metro West Project for Airport Environs Land Use

Plan (AELUP) Consistency, City of Costa Mesa

Dear Ms. Choum,

Please consider this application to determine consistency with the AELUP for John Wayne Airport (JWA) for the proposed One Metro West project located in the City of Costa Mesa.

1 Project Description

The proposed project, One Metro West, would redevelop the existing property located at 1683 Sunflower Avenue into a mixed-use development that consists of residential, retail, office, and open space uses. The project is proposed to include up to 1,057 residential dwelling units (anticipated to be rental units), 25,000 square feet of commercial office, 6,000 square feet of retail, and 1.5-acres of open space. The open space is proposed to be privately owned and maintained but available for general public use through the dedication of a public access easement. The project would also include off-site improvements to Sunflower Avenue and a bicycle trail connection to the existing Santa Ana River Trail. Proposed improvements to Sunflower Avenue include undergrounding the existing Southern California Edison (SCE) utility poles and lines along the project's frontage; reducing the travel lanes from a four-lane roadway to a threelane roadway with center striped left turn lane; and adding bicycle lanes, sidewalks, and parallel parking spaces. All existing buildings, structures, parking areas, drive aisles, and hardscape/landscape improvements are proposed to be demolished.

The proposed project would include three residential buildings, each with a parking structure, and one standalone office building. The residential buildings are

proposed with a maximum building height of 98 feet (seven stories). The office building is proposed to be 52 feet in height maximum (three stories). The total parking provided in the three parking structures would be 1,914 parking spaces.

The proposed project requires approval of a General Plan Ameridment, Zone Change, Specific Plan, Master Plan, Development Agreement, Tentative Tract Map. Tree Removal Permit and Public Art Plan. The General Plan Amendment would change the property's land use designation from Industrial Park to High Density Residential in order to allow the residential use with a site-specific density of 80 dwelling units per acre. The Zone Change would rezone the property from MP (Industrial Park) to PDR-HD (Planned Development Residential High-Density) and would allow for the proposed mix of land uses. The Specific Plan would establish the project's site-specific development standards and design guidelines and act as the zoning regulation document for the property. The Master Plan would provide floor plans, site plan details, building elevations and other schematic drawings to comply with the Specific Plan development standards and guidelines. The Tentative Tract Map would subdivide the property, including establishing the right to a future airspace subdivision for condominium purposes. The Development Agreement would include specific terms, conditions and agreements between the City and the applicant. In addition to the entitlements described above, the project requires a tree removal permit for trees within the City's public right-of-way on Sunflower Avenue and approval of a public art plan for artwork/displays visible from public right-of-way.

2 Project Location (See Area Map and Site Plan)

The 15.23-acre project site is located at 1683 Sunflower Avenue (Assessor's Parcel Numbers 139-651-14 and 139-031-06) in the City of Costa Mesa, Orange County. The project site is bound by Sunflower Avenue to the north, the South Coast Collection (SOCO) retail center to the east, the Interstate 405 Freeway (I-405; San Diego Freeway) to the south, and industrial and logistics uses to the west. The project site is developed with an existing industrial building approximately 345,000 square feet in area and an associated parking lot.

3 Existing and Proposed General Plan and Zoning Designations

The site's General Plan land use designation is Industrial Park. The Industrial Park designation applies to large districts that contain a variety of industrial and compatible office and support commercial uses. They are characterized by large parcels and landscaped setbacks and are situated within proximity to freeways and other major transportation routes. Development within this land use designation consists of one and two-story buildings.

The site is zoned Industrial Park (MP) which is intended for large, concentrated industrial areas where the aim of development is to create a spacious

environment in a park-like setting. The site is also located within the City's Measure X zone, which allows for certain cannabis-related manufacturing and distribution uses.

The project proposes to change the site's General Plan land use designation from Industrial Park to High Density Residential with a site-specific base density of 80 dwelling units per acre with a maximum of 1,057 residential units and a site-specific maximum building height of 98 feet (seven stories). Concurrently, the project also proposes a Zone Change from the MP zone to the PDR-HD zone. According to Municipal Code Section 13-20, Zoning Districts, PDR-HD zones are intended for multi-family residential developments containing a mixture of housing units, either attached or detached, such as clustered development, high rise apartments, or common interest developments. Complementary non-residential uses could also be included in the planned development. As such, the proposed PDR-HD zone would allow a mix of residential and non-residential uses.

4 Existing and Proposed Uses On-Site and Surrounding Properties

The project site is developed with an approximate 345,000-square-foot one-story industrial building (31 feet high), associated parking, and landscaping. The industrial building is occupied by the Sakura Paper Factory, Robinson Pharma, South Coast Baking, and Dekra-Lite Industries, Inc; not all tenant spaces are in full operations. Current uses on site include warehouse and distribution uses.

The project site is in an urbanized area and surrounded by industrial uses to the north; SOCO (retail center) to the east; the I-405 Freeway to the south; and commercial and industrial uses to the west. Across the I-405 Freeway to the south is a single-family residential community and the 1.7-acre Moon Park. The Santa Ana River and the Santa Ana River Trail are located 700 feet west of the project site. An existing bicycle path extends from the project's western boundary to the Santa Ana River Trail and north along the western boundary to Cadillac Avenue.

The proposed project would redevelop the site for a mixed-use development that consists of residential, office, retail and open space uses. The residential component would include 1,057 rental dwelling units. The retail use would be integrated within one of the residential buildings and the office would be a standalone building.

5 Public Hearing Schedule

The project was first presented to the Costa Mesa Planning Commission at its regular meeting of April 13, 2020. The item was continued and is currently scheduled for the May 11, 2020 Planning Commission meeting. The Planning Commission will make a recommendation to the Costa Mesa City Council. If the Planning Commission makes a recommendation of approval, the project will be

scheduled for City Council hearings in June 2020 pending a determination of consistency by ALUC. The tentative City Council hearing dates are June 2, 2020 and June 16, 2020.

6 CNEL Contour

The project is not within the 60 CNEL noise contour of JWA.

7 Runway Protection Zone (RPZ)

The project is not within the RPZ of JWA.

8 Height Restriction Zone

The project is within the Height Restriction Zone for JWA (FAR Part 77 Notification Area). Based on the Notice Criteria Tool, the proposed project is required to file Form 7460-1 Notice of Proposed Construction or Alteration with the FAA because it may impact the assurance of navigation signal reception. Form 7460-1 is provided as an attachment.

9 Applicable Sections of the CEQA documentation

The Draft EIR for the project is available here: https://www.costamesaca.gov/city-hall/city-departments/development-services/planning/one-metro-west

10 Latitude and Longitude

Latitude: 33°41'40.80 N
Longitude: 117°55'44.80 W

11 Height of the Proposed Structures

The maximum height of the proposed residential structures is seven stories or 98 feet. The maximum height of the proposed office building is three stories or 52 feet.

12 Project Elevations

The National Geodetic Survey Data Explorer shows the project elevation at 34 feet above mean sea level.

(Source: https://www.ngs.noaa.gov/NGSDataExplorer/)

13 Building Height Restrictions

The project's proposed Specific Plan includes development standards for

maximum building height allowed for all structures on-site. Per the Specific Plan, the maximum building height allowed for the residential buildings is seven stories (98 feet). The maximum building height allowed for the office building is three stories (52 feet).

14 Building Height of Surrounding Structures

Building heights within a 1,000-foot radius surrounding the project site (which include office, industrial, retail, and residential buildings) are a maximum of approximately 45 feet.

If you have any comments or questions, please contact Minoo Ashabi at (714) 754-

5610.

Sincerely,

BARRY CURTIS, AICP

Director of Economic and Development Services

- A Proposed Site Plans and Building Elevations
- B Existing Site Photos
- C Vicinity Area Map
- D Zoning Map
- E Form 7460-1 (Notice of Proposed Construction or Alteration)

EXISTING SITE PHOTOS – 1683 SUNFLOWER AVENUE



View From Sunflower Ave.



View of the Robinson Pharma office from the North.



View of the sidewalk to the lobby entrance at the Robinson Pharma space.



View of the lobby entrance to the Robinson Pharma office space.



View of Robinson Pharma signage on the South side of the building.



View of the Robinson Pharma office area facade.



View of the portion of the south wall at the TY North America space.



View of the picnic table and bike rack in the Robinson Pharma parking area.



General view of the courtyard area on the south side of the Robinson Pharma space.

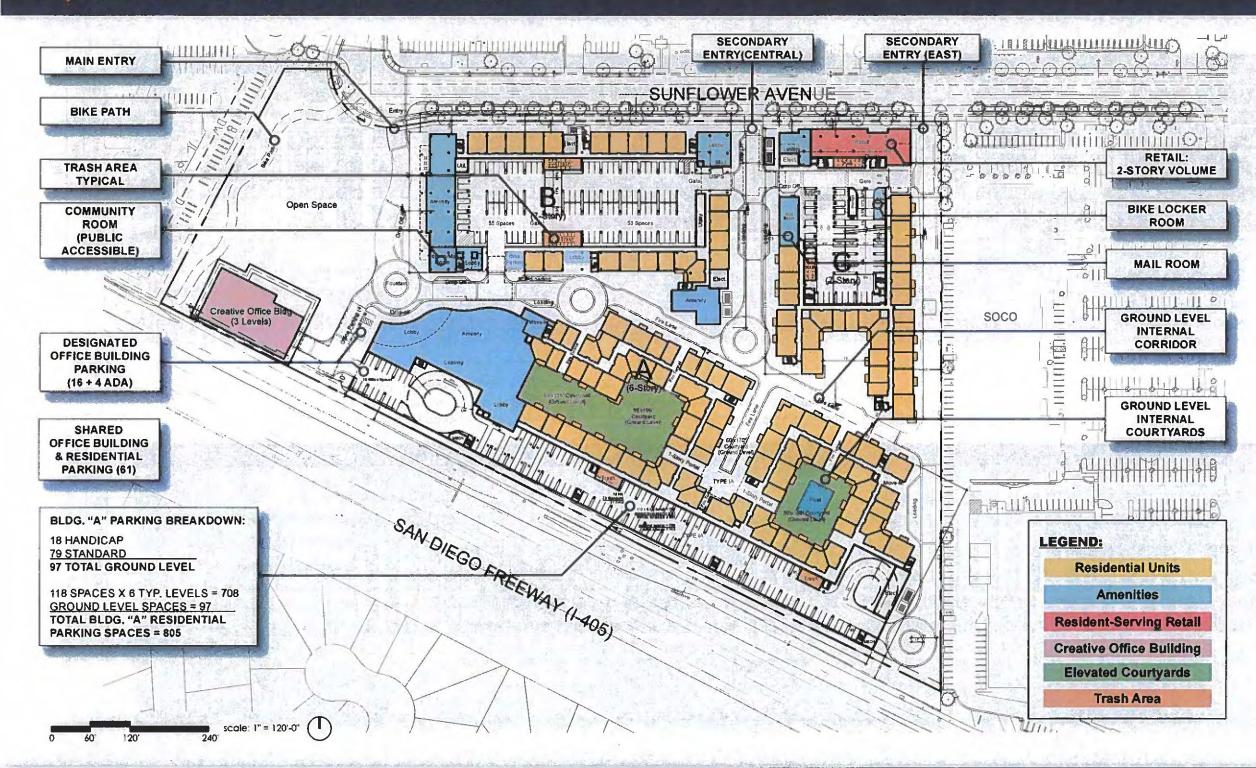


View of the elevated dock area at the Robinson Pharma space.

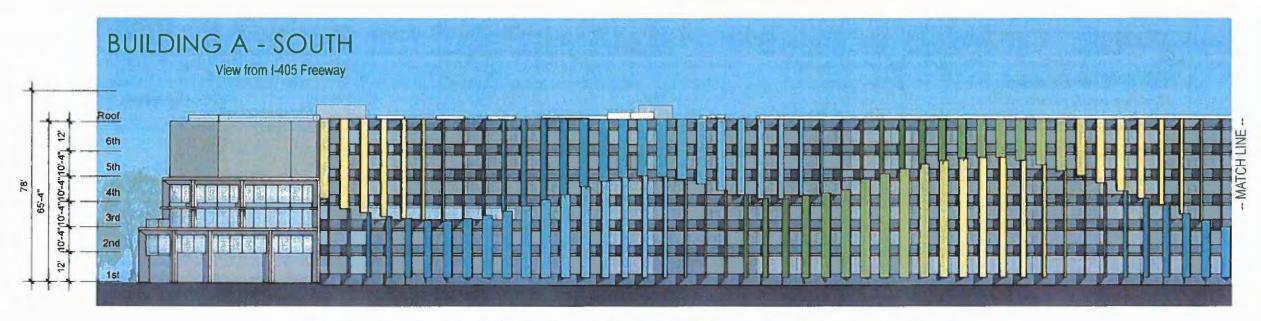


View at the TY North America loading dock area.

7 | SITE PLAN: GROUND LEVEL

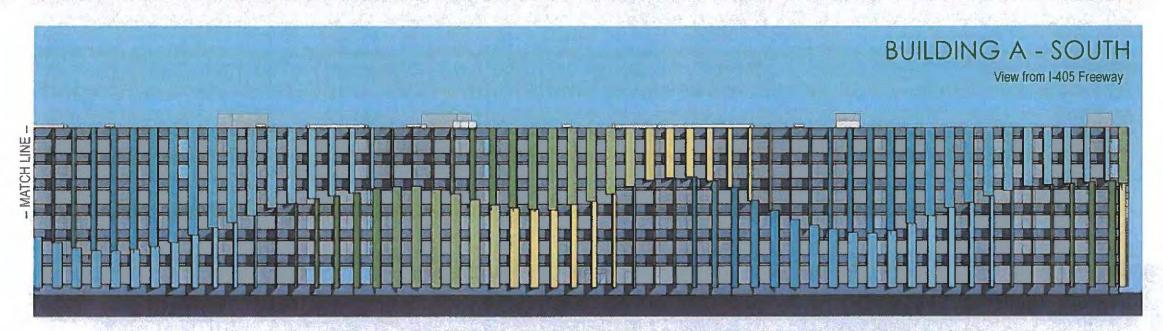


23 BUILDING A ELEVATIONS



*Note: Prior to issuance of the first Building Permit for One Metro WEST, the owner/developer shall submit a Design Plan for the Building "A" Parking elevation along the I-405 Freeway for the approval by the City's Cultural Arts Committee. The current design shown in this exhibit is preliminary.





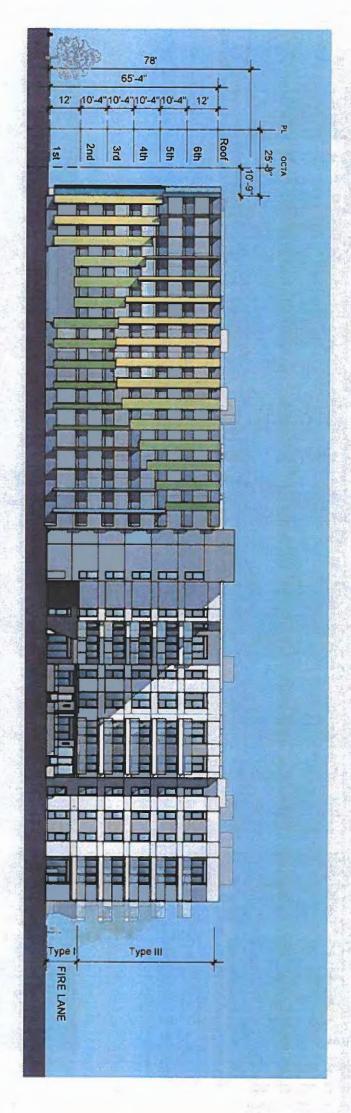
*Note: Prior to issuance of the first Building Permit for One Metro WEST, the owner/developer shall submit a Design Plan for the Building "A" Parking elevation along the I-405 Freeway for the approval by the City's Cultural Arts Committee. The current design shown in this exhibit is preliminary.





BUILDING A - WEST

View from Open Space and Creative Office Building



BUILDING A - EAST

View from South Coast Collection



BUILDING B - WEST

View from Open Space



BUILDING B - NORTH

View from Sunflower Avenue



BUILDING B - EAST

View from Secondary Entry (Central)



BUILDING B - SOUTH

View from Internal Open Space Corridor

29 BUILDING C ELEVATIONS



BUILDING C - NORTH

View from Sunflower Avenue with Ground Floor Retail



BUILDING C - WEST View from Secondary Entry (Central)

CREATIVE OFFICE BUILDING | 40

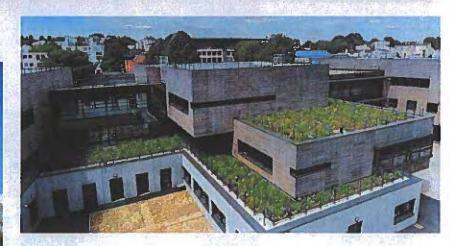


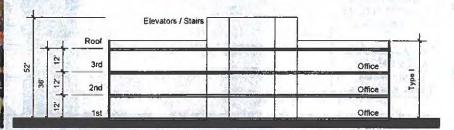


PRECEDENT IMAGERY









BUILDING SECTION - OFFICE

CONCEPTUAL LANDSCAPE PLAN | 48

