CITY OF NANAIMO
THE HARBOUR CITY

Staff Report

File Number: DVP00318

DATE OF MEETING September 18, 2017

AUTHORED BY TAMERA ROGERS, PLANNER, CURRENT PLANNING AND SUBDIVISION

SUBJECT **DEVELOPMENT VARIANCE PERMIT NO. DVP318 – NO. 3 - 114 GIBRALTER ROCK**

OVERVIEW

Purpose of Report

To present for Council's consideration, a development variance permit application to allow the construction of single residential dwelling with variances to the rear yard setback, building height and perimeter wall height at 3-114 Gibralter Rock.

Recommendation

That Council issue Development Variance Permit No. DVP318 at 3 -114 Gibralter Rock with the following variances:

- reduce the minimum rear yard setback from 7.5m to 6.84m;
- increase the maximum building height for a flat roof from 7m to 8.79m; and,
- increase the maximum perimeter wall height as follows:
  - north elevation (front) from 7.32m to 9.1m
  - west elevation (side) from 7.32m to 9.27m
  - east elevation (side) from 7.32m to 8.82m.

BACKGROUND

A development variance permit application, DVP318, was received from Ms. Susan Beyerstein to vary the provisions of the City of Nanaimo "Zoning Bylaw 2011 No. 4500" to allow the construction of a single residential dwelling with variances to the rear yard setback, building height and perimeter wall height at 3 - 114 Gibralter Rock.

A development variance permit was approved by Council on 2010-OCT-04. It varied the rear yard setback from 7.5m to 4.4m and the building height for a flat roof from 6.71m to 9.63m in order to permit the construction of a three-storey single residential dwelling. As the proposed house was never constructed, the approved development variance permit expired. The new owners are proposing a different house design.

Subject Property

Zoning	R1 – Single Dwelling Residential
Location	The subject property is located at the end of Gibralter Rock, a private road located off Sundown Drive
Total Lot Area	1,319m^2
Official Community Plan	Map 1 – Future Land Use - Neighbourhood

The subject property is part of a three-lot bare land strata development in which all three lots are accessed via a common driveway off Gibralter Rock. The lot slopes down from the rear (southern) property line towards the common driveway to the north. The subject property and surrounding lots all have views of Pipers Lagoon Park and the ocean. The rear (upslope) property line borders a City-owned park, which separates the subject property from the nearest single dwelling residential lot to the south (further upslope) by a distance of 16.5m. Within the bare land strata, Lot 1 includes a flat roofed home with a similar style to the proposed house and Lot 2 is vacant. The surrounding area is comprised entirely of single residential dwellings.

Statutory Notification has taken place prior to Council's consideration of the variance.

DISCUSSION

Proposed Development

The proposed development is a three-storey, 364m^2 single residential dwelling with a flat roof. Due to the steep terrain and the location of a driveway easement in the northeast corner of the subject property, the building siting is limited to a flatter area to the front of the site. Variances are requested to the rear yard setback, maximum building height and maximum perimeter wall height for the north, west and a portion of the east building elevation to accommodate the proposed building design.

In order to reduce the visual height of the building's wall faces, the house has been stepped back along the slope.

PROPOSED VARIANCES

Minimum Rear Yard Setback

The minimum rear yard setback is 7.5m. The proposed rear yard setback is 6.84m to the cantilevered second storey, a proposed variance of 0.66m.

Due to the steep slope of the land and presence of City parkland along the rear property line, the proposed setback variance will not infringe on the privacy of surrounding property owners.

Maximum Building Height

The maximum building height for a single residential dwelling with a flat roof is 7m. The proposed building height is 8.79m, a proposed variance of 1.79m.

The building height of a single residential dwelling (within the R1 zone) with a roof pitch greater or equal to 4:12 can be up to 9m high. The previous development variance permit (DVP158) approved a building height for a flat roof of 9.63m, a greater variance than the one currently requested. The strata submitted a letter of support stating it is in favour of the proposed house design and variances.

The majority of lots in the area offer ocean views to the north. The location of the proposed house is approximately 27m below the elevation of the existing dwellings to the south. Due to

the significant difference in elevation between the building site on the subject property and the upslope lots, the proposed height and setback variances are not anticipated to negatively affect neighbouring views.

Maximum Perimeter Wall Height

The maximum perimeter wall height is 7.32m for all elevations. The perimeter wall height is proposed to be varied as follows:

North Elevation (Front)

The proposed perimeter wall height is 9.1m, a proposed variance of 1.78m.

West Elevation (Side)

The proposed perimeter wall height is 9.27m, a proposed variance of 1.95m.

East Elevation (Side)

The proposed perimeter wall height is 8.82m, a proposed variance of 1.5m.

In order to reduce the visual height of the building's wall faces, the house has been stepped back along the slope.

SUMMARY POINTS

- Development Variance Permit No. DVP318 proposes variances to the rear yard setback, building height and perimeter wall height on the north, west, and east elevations to accommodate the proposed building design on a sloping lot.
- The proposed building design maximizes ocean views and maintains a building form that is characteristic of others in the neighbourhood.
- The requested height variance is not anticipated to negatively affect adjacent properties.

ATTACHMENTS

ATTACHMENT A: Permit Terms and Conditions
ATTACHMENT B: Location Plan
ATTACHMENT C: Site and Height Survey
ATTACHMENT D: Elevations
ATTACHMENT E: Letter of Rationale
ATTACHMENT F: Letter of Support from Strata
ATTACHMENT G: Aerial Photo

Submitted by:

L. Rowett
Manager, Current Planning and Subdivision

Concurrence by:

D. Lindsay
Director, Community Development

ATTACHMENT A
PERMIT TERMS AND CONDITIONS

TERMS OF PERMIT

The City of Nanaimo "ZONING BYLAW 2011 NO. 4500" is varied as follows:

1. *Section 7.5.1 Siting of Buildings* – to reduce the minimum rear yard setback for a principal building from 7.5m to 6.84m.

2. *Section 7.6.1 Size of Buildings* – to increase the maximum building height for a flat roof from 7m to 8.79m.

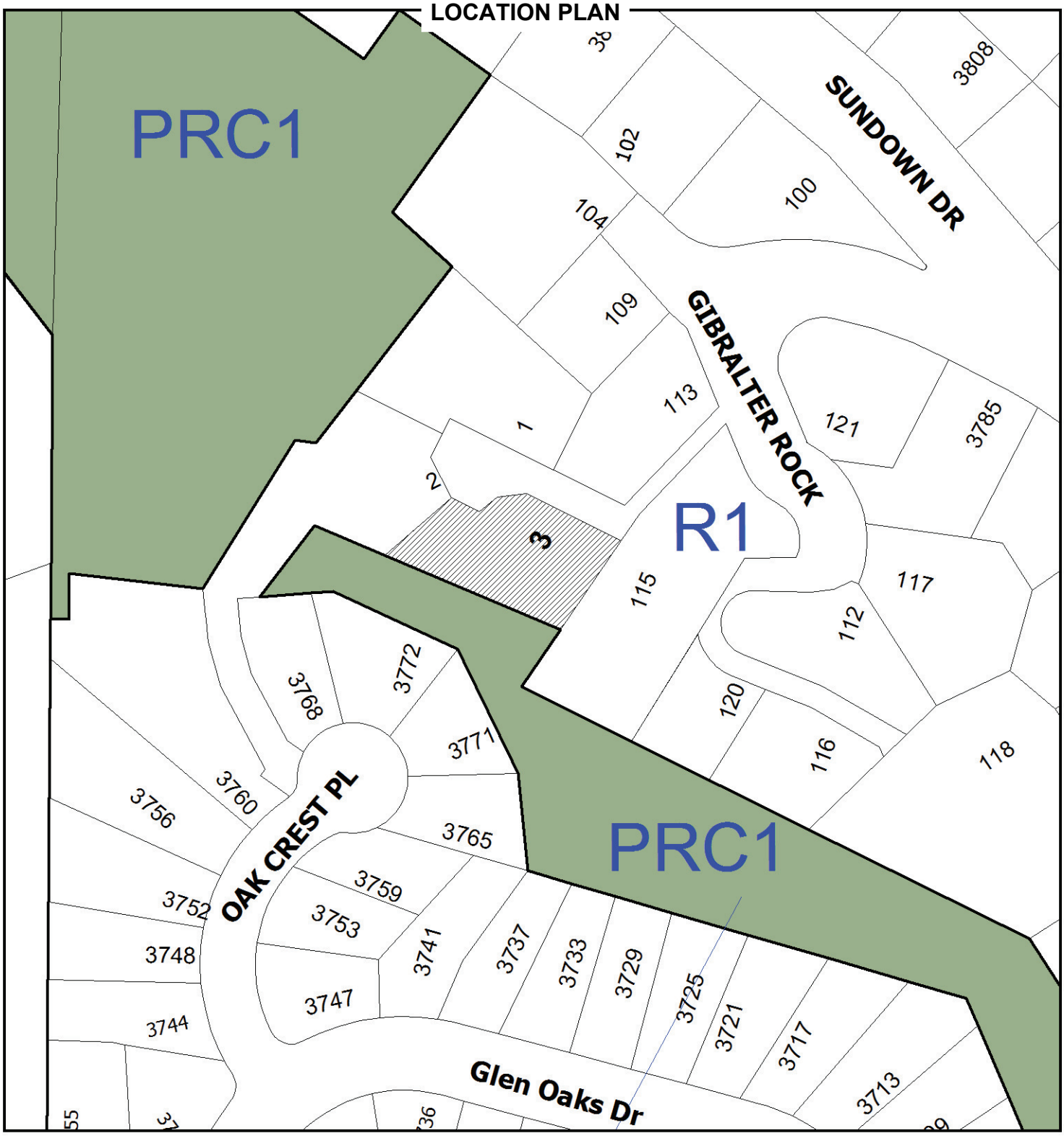
3. *Section 7.6.1 Size of Buildings* – to increase the maximum perimeter wall height as follows:
    i. North elevation (front): from 7.32m to 9.1m
    ii. West elevation (side): from 7.32m to 9.27m
    iii. East elevation (side): from 7.32m to 8.82m

CONDITIONS OF PERMIT

1. The subject property shall be developed in accordance with the Site and Height Survey prepared by J.E Anderson & Associates dated 2017-AUG-22, as shown on Attachment C.

2. The subject property shall be developed generally in accordance with the elevations prepared by Datum Point Studios dated 2017-AUG-29, as shown on Attachment D.

ATTACHMENT B
LOCATION PLAN



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DEVELOPMENT VARIANCE PERMIT NO. DVP00318

LOCATION PLAN

Civic: Unit 3 - 114 Gibralter Rock
Strata Lot 3, District Lot 39, Wellington District,
Strata Plan VIS5470

Subject Property

ATTACHMENT C
SITE AND HEIGHT SURVEY

J.E. ANDERSON & ASSOCIATES
SURVEYORS – ENGINEERS
TEL: 250-758-4631 FAX: 250-758-4660
NANAIMO - VICTORIA - PARKSVILLE

File: 88795

Civic: #3–114 Gibralter Rock, Nanaimo, B.C.

Legal: Strata Lot 3, District Lot 39, Wellington District, Strata Plan VIS5470 together with an interest in the Common Property in proportion to the Unit Entitlement of the Strata Lot as shown on form V

Dimensions are in metres and are derived from Strata Plan VIS5470.

This sketch does not constitute a redefinition of the legal boundaries hereon described and is not to be used in any matter which would assume same.

This sketch plan has been prepared in accordance with the Professional Reference Manual and is certified correct this 22nd day of August, 2017.

Douglas Holme VXC3QR Digitally signed by Douglas Holme VXC3QR Date: 2017.08.22 08:42:16 -07'00'

B.C.L.S.

This document is not valid unless originally signed and sealed or digitally signed by BCLS

The signatory accepts no responsibility or liability for any damages that may be suffered by a third party as a result of any decision made, or actions taken based on this document.

Subject to charges, legal notations, and interests shown on: Title No. CA3271812 (P.I.D. 025–851–675)

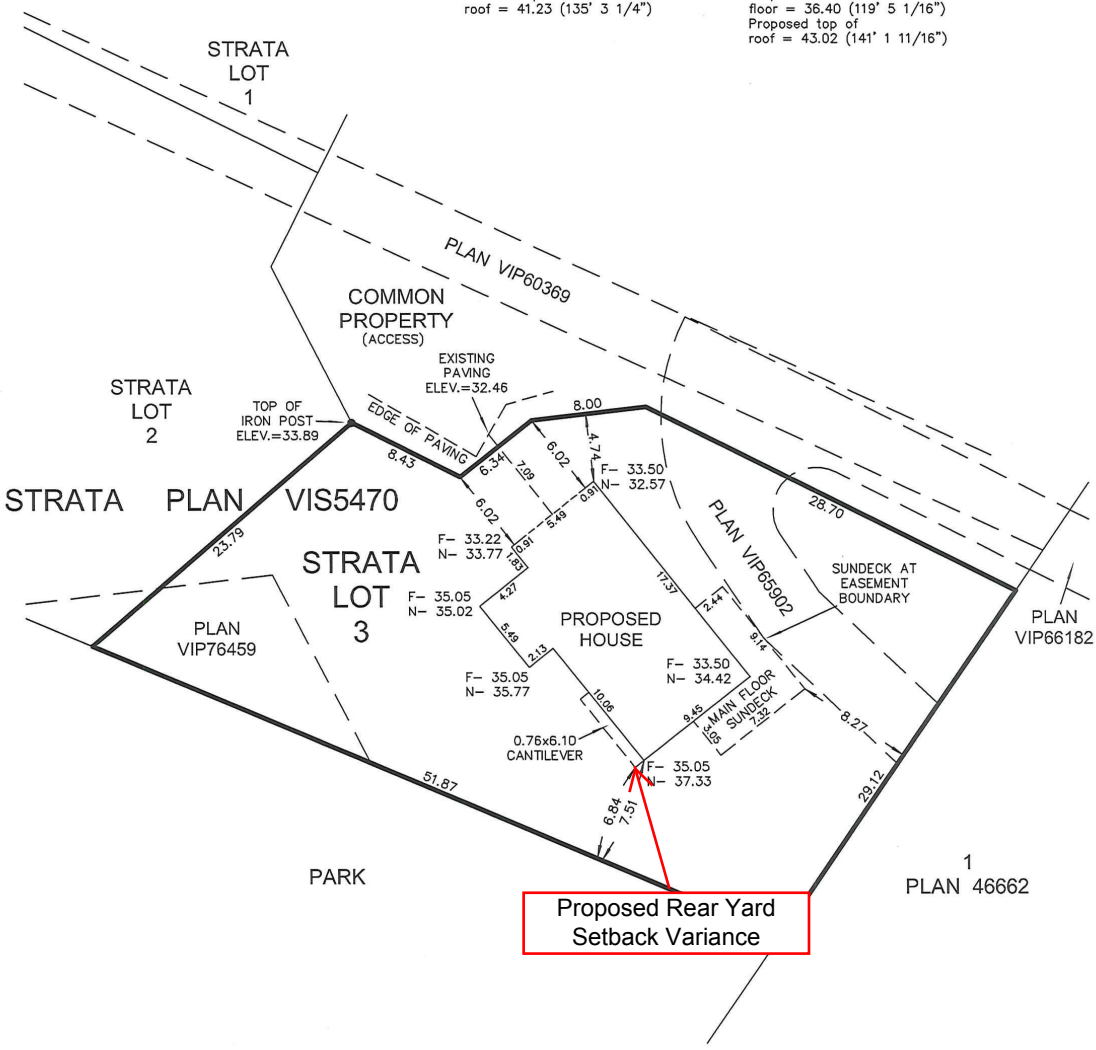
Scale 1:300

0 3 6 12 18 24 30

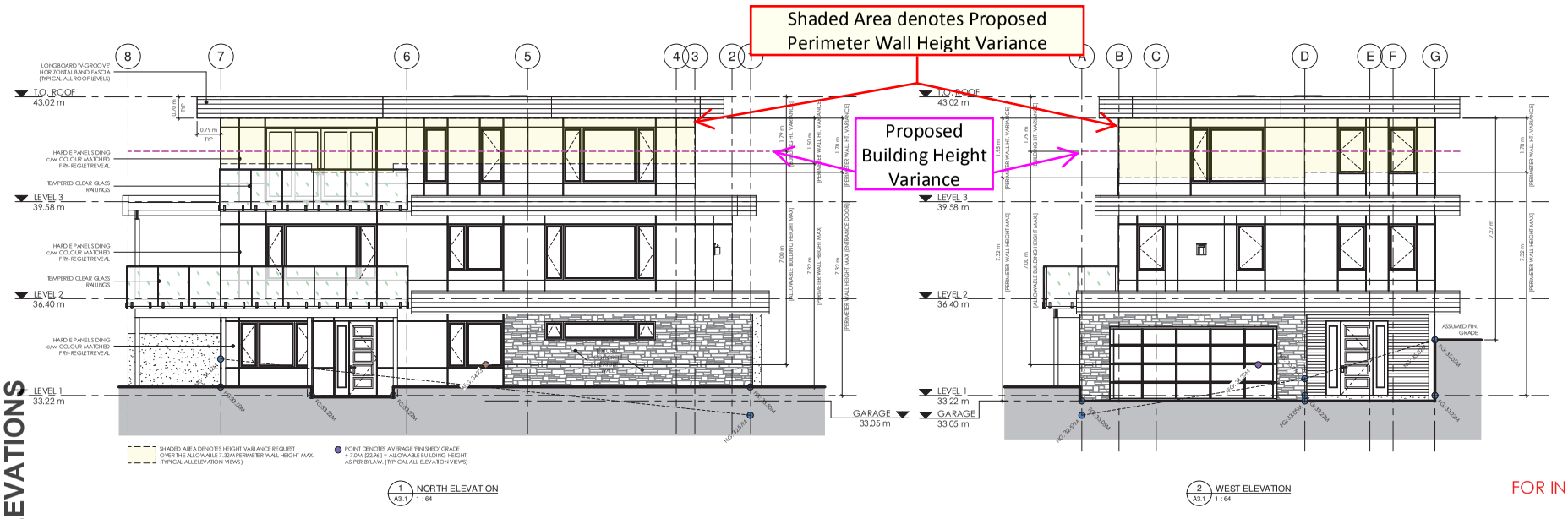
Datum for elevations, in metres, is assumed
F– denotes finished grade as per building plans
N– denotes natural grade

Average natural grade = 34.81 (114' 2 1/2")
Average finished grade = 34.23 (112' 3 5/8")
Maximum peak of roof = 41.23 (135' 3 1/4")

Proposed garage slab = 33.05 (108' 5")
Proposed basement slab = 33.22 (109' 0")
Proposed main floor = 36.40 (119' 5 1/16")
Proposed top of roof = 43.02 (141' 1 11/16")

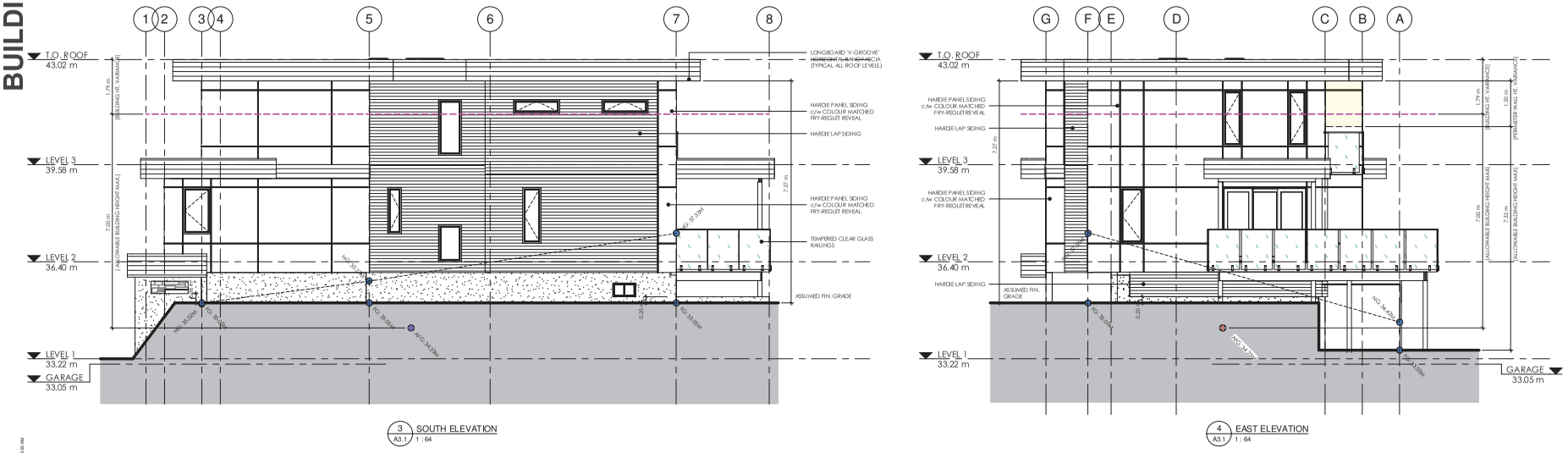


ATTACHMENT D
BUILDING ELEVATIONS



1 NORTH ELEVATION A3.1 1 : 64

2 WEST ELEVATION A3.1 1 : 64



3 SOUTH ELEVATION A3.1 1 : 64

4 EAST ELEVATION A3.1 1 : 64

RECEIVED
DVP318
2017-AUG-29
Current Planning & Subdivision

DATUMPOINT STUDIO

101-5170 Dunster Road
Suite #256
Nanaimo, BC V9T 6M4

T 250.667.3286
E mail@datumpoint.ca

www.datumpoint.ca

ASTTBC TECHNOLOGY FROM ESSENTIALS

DESIGNER SEAL

ENGINEER SEAL

CLIENT

FOR INFORMATION ONLY

12	DVP 4 Submission	2017.08.29
11	DVP 3 Submission	2017.08.24
10	DVP 2 Submission	2017.08.18
9	BCLS Data Added	2017.07.02
8	DVP Submission	2017.06.20
7	CP - PWH Review	2017.06.08
6	City Planning Review 1	2017.05.25
5	Concept Review 4	2017.05.25
4	Concept Review 3	2017.04.06
3	BCLS Coord. 1	2017.03.29
2	Concept Review 2	2017.03.22
1	Concept Review 1	2016.12.31

ISSUED FOR

- ☐ BUILDING PERMIT
- ▣ CLIENT APPROVAL
- ☐ CLIENT REVIEW

ISSUED DATE: 2017.08.29

PROJECT NO: 16.20 DRAWN: DM
SCALE: 1 : 64 CHECKED: AW

PROJECT

Single Family Residential

3-114 Gibraltar Rock, Nanaimo, BC

SHEET TITLE

Building Elevations

SHEET NUMBER

A3.1

FILE PATH:
PLOT DATE: 8/28/2017 10:39:39 AM

ATTACHMENT E
LETTER OF RATIONALE

August 29, 2017

City of Nanaimo
Community Development Department
411 Dunsmuir St.
Nanaimo, BC, V9R 5J6

Attn: Tamera Rogers, Planner, Planning and Design Section

Re: Susan Beyerstein – Jack Mawhinney Residence
Design Rationale – Development Variance Permit Report
Proposed Single Family Residential (R1 Zone)
3-114 Gibralter Rock, Nanaimo, BC

Dear Tamera:

As part of the submission for a Development Variance Permit, we have prepared the following report to address the objectives of the permit guidelines in accordance with the City of Nanaimo Bylaw 2011 No. 4500 Part 7 – Residential Zones.

Austin Werner is away this week, so his report and drawings have been revised to address your recent concern regarding the Perimeter Wall Height variance. Austin of Datumpoint Designs has submitted revised elevations on Drawing A3.1 which illustrate Perimeter Wall Heights along various elevations of the proposed house.

With the current revisions, the proposed PW Heights on the North and West facades are shown for different grade elevations.

Project Site Description:

The Project site is approximately 1,228.56m^2 (13,224.11 SF) in size, located at the civic address 3-114 Gibralter Rock, Nanaimo, BC within the city of Nanaimo jurisdiction. A three story, single family residential building, positioned predominantly within the required setbacks for R1 Zoning is proposed for this site.

Present landscape is an undisturbed rocky stepped plateau with wild grasses, ferns, moss and a few mature trees.

Zoning:

The subject property is currently zoned as R1 (Single Dwelling Residential) as per City of Nanaimo Bylaw 2011 No. 4500, Part 3 – Establishment of Zones, Part 7 Residential Zones

Proposed Variances Requested:

1.0 Perimeter Wall Height

Description

For this proposed residential building project, a request is made to vary the provisions of the City of Nanaimo Zoning Bylaw 2011 No. 4500, Section 7.6.1 to allow for a perimeter wall height that exceeds the maximum of 7.32m measured from the finished grade to the underside of the soffit, on the North and West sides.

NORTH ELEVATION

The general finished grade along the North wall has been raised to 33.50M from 33.22M, **except** at the entry door to the ground level studio. At that location, there will be an approximately 2.0M wide cut to the entry door, where the finished grade will be 33.22M.

MAX PERIMETER WALL HEIGHT (PWH) PER BYLAW	= FG + 7.32M = 40.82M (133.92 FT)
GENERAL FINISHED GRADE (FG) N-ELEVATION	= 33.50M (109.91 FT)
PROPOSED ELEVATION OF SOFFIT	= 42.32M (138.85 FT)
PROPOSED PWH (GENERAL)	= 42.32M – 33.50M = 8.82M (28.94 FT)
VARIANCE REQUEST FOR PWH (N-ELEVATION)	**= 8.82M – 7.32M = 1.50M (4.92 FT)**
FINISHED GRADE AT NORTH ENTRY DOOR	= 33.22M (109-FT)
PROPOSED PWH (AT ENTRY DOOR)	= 42.32M – 33.22M = 9.10M ((29.86-FT)
VARIANCE REQUEST FOR PWH (N-ELEVATION)	**= 9.10M – 7.32M = 1.78M (5.84-FT)**

WEST ELEVATION

On the West Elevation, the finished grade for purposes of determining Perimeter Wall Height is 33.22M, **except** for the 7.32M wide garage. In order to comply with the City of Nanaimo by-law pertaining to maximum driveway gradient, it was necessary to lower the garage slab 0.18M to elevation 33.05M.

MAX PERIMETER WALL HEIGHT (PWH) PER BYLAW	= 7.32M (24.00-FT)
GENERAL FINISHED GRADE (FG) W-ELEVATION	= 33.22M (109.00-FT)
PROPOSED ELEVATION OF SOFFIT	= 42.32M (138.85-FT)
PROPOSED PWH (GENERAL)	= 42.32M – 33.22M = 9.10M (29.86-FT)
VARIANCE REQUEST FOR PWH (W-ELEVATION)	**= 9.10M – 7.32M = 1.78M (4.92 FT)**
FINISHED GRADE AT WEST GARAGE DOOR	= 33.05M (108.43-FT)
PROPOSED PWH (AT GARAGE DOOR)	= 42.32M – 33.05M = 9.27M ((30.41-FT)
VARIANCE REQUEST FOR PWH (GARAGE DOOR)	**= 9.27M – 7.32M = 1.95M (6.40-FT)**

The Perimeter Wall Height Variances shown above are requested.

Justification

The proposed architectural features were chosen to take advantage of the ocean views, to facilitate the owner's age-in-place objectives with an elevator serving all levels, to meet existing strata guidelines and fit in with the neighbourhood's West Coast contemporary style. The five immediate neighbours have flat or low-slope roofs. The site chosen will preserve the

only old growth fir tree as well as protect the fragile ecosystem of the rocky moss covered cliff behind the house.

The building design has the following objectives:

- Although the property is zoned R1, the stepped-back design is consistent with the intent for R10 slopes, in that the façade approximately reflects the stepped-rock cliff behind the house.
- The elevation of the basement slab relative to the strata cul-de-sac meets the City of Nanaimo requirements for an approved driveway gradient. (See the attached drawing.) The elevation of the garage slab will allow us to integrate some additional guest parking on the property. The house is intended to be fully wheelchair accessible; however, a ramp will be provided to address the 0.18M drop in the garage slab level required to comply with the driveway gradient limitation.

The height variances requested are the minimum that will make possible the reasonable best use of the land, building or structure.

Historical precedent

In 2010, the previous property owner, Dr. Seltenrich, applied for, and was granted variances more substantial and complex than the ones we are asking for today. Dr. Seltenrich's flat roof design required a 2.92m height variance with a proposed building height of 9.63m and a rear yard setback reduction to 4.4m. (Permit #DVP00158). The present Owners are asking for similar consideration by the present City Council.

2.0 Building Height

An additional variance is requested under the City of Nanaimo Zoning Bylaw 20ll No. 4500 in order to allow for the proposed building height of 8.79M (28.84-FT) above average finished grade (AFG), as opposed to 7.0M allowed in Table 6.6.5 in the Bylaw.

AVERAGE FINISHED GRADE (AFG)	= 34.23M (112.30 FT)
MAXIMUM PEAK OF ROOF PER BYLAW	= AFG + 7.0M = 41.23M (135.27 FT)
PROPOSED PEAK OF ROOF = AFG + 8.79M	= 43.02M (141.14 FT)
BUILDING HEIGHT VARIANCE REQUEST	**= 43.02M – 41.23M = 1.79M (5.87 FT)**

Justification:

A variance 1.79M (5.87') is requested in order to permit the flat roof elevation of 43.02M (141.14') which is 8.79M, as opposed to 7.0M, above the Average Finished Grade of 34.23M (112.30-FT).

The rocky precipice on this site presents several design challenges:

- A substantial rock-roll area in the South West corner is excluded.
- An existing raised rock platform requires the maximum slope possible on the driveway.
- An existing easement for the driveway of the neighboring property at 115 Gibralter Rock cuts through the front yard, and constrains the buildable zone of the North boundary.
- A steep rocky cliff dominates the South boundary with a woodland park at the top.

The proposed design is stepped back on each level to minimize the visual impact of the structure, in a manner similar to R10 steep slope requirements. None of the finished floor heights exceeds 2.74m (9'). The depth of the roof trusses and a minimal slope on the flat roof for drainage are hidden by the fascia boards along the roof.

The proposed house will not obstruct the neighbours' view, nor block the view from the Greenbelt park above. It will not cast unwelcome shadows on any other property. From the entryway to 115 Gibralter Rock, the closest neighbour, the house will only expose two stories, and the width of the side yard will be generous (nearly 11M to the property line 8.7M from the edge of the deck).

The requested variance will enable the best use of the land, without excessive excavation costs. The stacked house design facilitates servicing all levels of the residence with an elevator (an important element of the residence).

Historical precedent

In 2010, the previous owner, Dr. Seltenrich, applied for, and was granted variances more substantial and complex than the ones we are asking for today. Dr. Seltenrich's flat roof design required a 2.92M height variance with a proposed building height of 9.63M. (Permit #DVP00158). The present Owners are asking for similar consideration by the present City Council.

3.0 Lot Setbacks

Description:

For this proposed residential building project, the request is to vary the provisions of the City of Nanaimo Zoning Bylaw 2011 No. 4500 in order to allow for a relaxation of projections and siting of the building structure within the established subject property setbacks of 7.5M.

Justification:

The City of Nanaimo Zoning Bylaw 2011 No. 4500, Table 7.5.1 Siting of Buildings for R1 Lots requires 7.50M for a rear yard. The proposed setback adjustment is 1.83M (6') to allow for cantilever and roof overhangs, thereby reducing the rear yard setback to 5.67M.

The 0.76M (2.5') cantilever of the First and Second floors behind the rear concrete foundation wall into this rear setback is required to facilitate adequate space planning within the residence on these upper floors. This 1.83M projection into the 7.5M rear yard will not impact the surrounding properties as this residence is tucked securely into the cliff-side, well below the sight lines of the residences above along Oak Crest Place cul-de-sac and adjoining the designated parkland.

This minimal variance enabled the staggered front elevation, without sacrificing the kitchen/family room design requirements.

Historical precedent:

In 2010, Dr. Seltenrich was granted a rear yard reduction of 4.4M (14.4') in his DVP Permit #00158. This current proposed design requires a variance of only 1.83M. (6').

The Proposed Building:

PROPOSED FINISHED FLOOR ELEVATION (FFE) (GROUND LEVEL) = 33.22M (109.00 FT)
TOTAL BUILDING HEIGHT FFE TO PEAK OF ROOF = 9.80M (32.15 FT)
PROPOSED ELEVATION OF PEAK OF ROOF = 43.02M (141.14 FT)

The proposed residential building is 171.9m2 (1851 SF) in footprint size with outside dimensions of 17.37M (57') x 11.58M (38') x 9.8M (32.15') as measured from the Basement (F.F. E.) Floor Level. Total finished areas of 363m2 (3924 SF) exclude the garage area. Under the B.C.B.C. 2012, Sentence 1.3.3.3 Application of Part 9 –Group C – Residential Occupancy permits up to but no more than 600m2 (6458 SF). This building design also accounts for 18% overall lot coverage. Under R1- Single Family Residential Zoning permits 40% of lot coverage.

Considerations for ambient day-lighting throughout this building are addressed with generous placement of clear glazing units of typical size along the front building elevation (North/East), as well as two (2) skylights for interior spaces, as illustrated on these design drawings.

The building illustrates an articulated stepped back multi-level 3-story form along the entrance lane facing wall elevation, creating visual interest that is in harmony with the lot characteristics. In our view, the use of subtractive spaces on each floor level adequately breaks this flat perimeter wall elevation massing the two (2) full 3-story building faces (N/W and N/E).

The design characteristics are reinforced along the established easement right of way approach to the residence driveway. (See Fig. 1. – Camera view & Fig. 2. Camera view 2, next page) as identified on the Architectural Site Plan). Fig. 3. is a Site Profile.

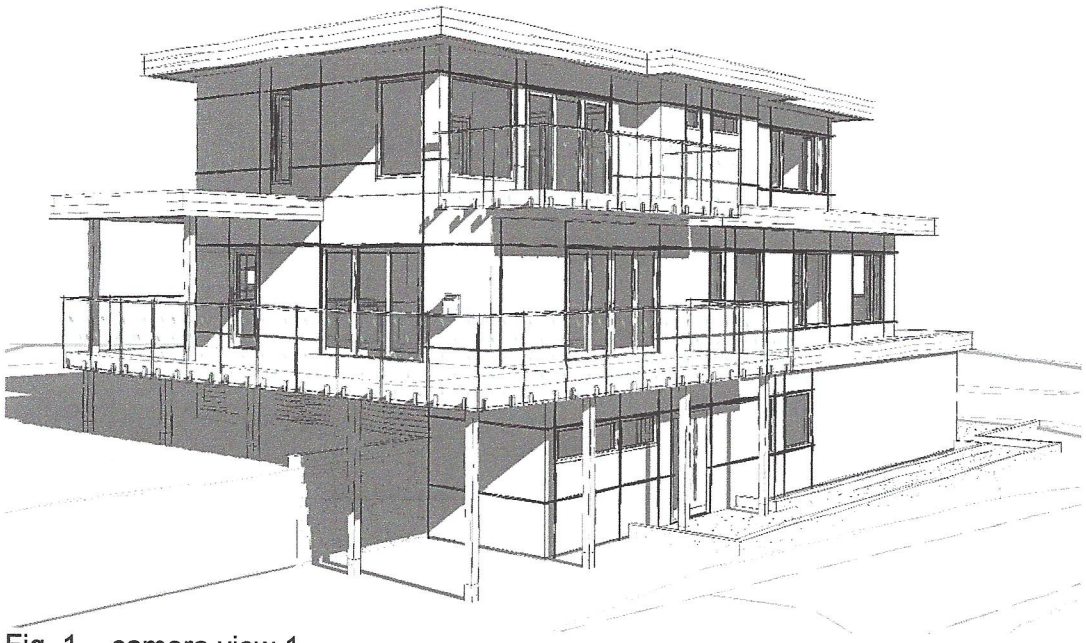


Fig. 1 – camera view 1

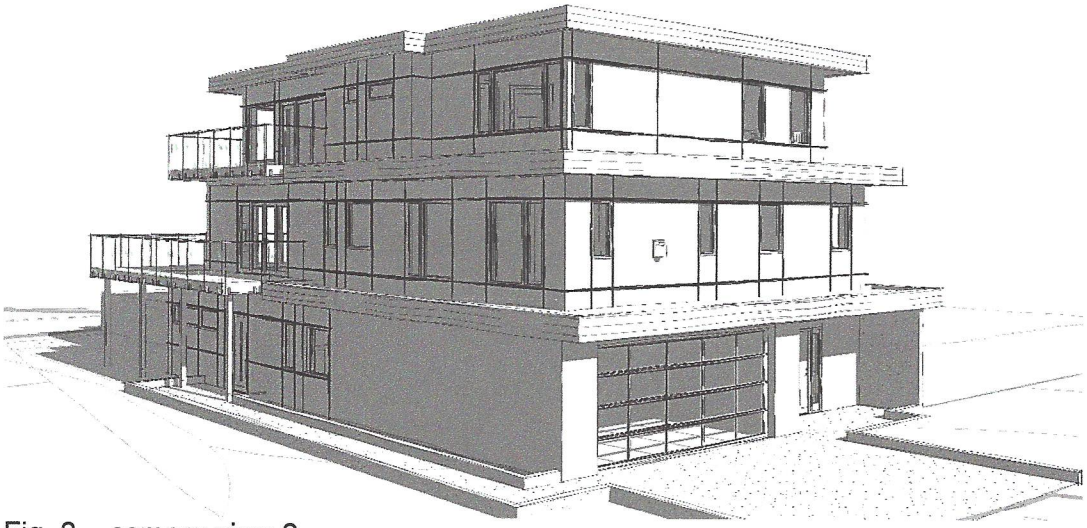


Fig. 2 – camera view 2

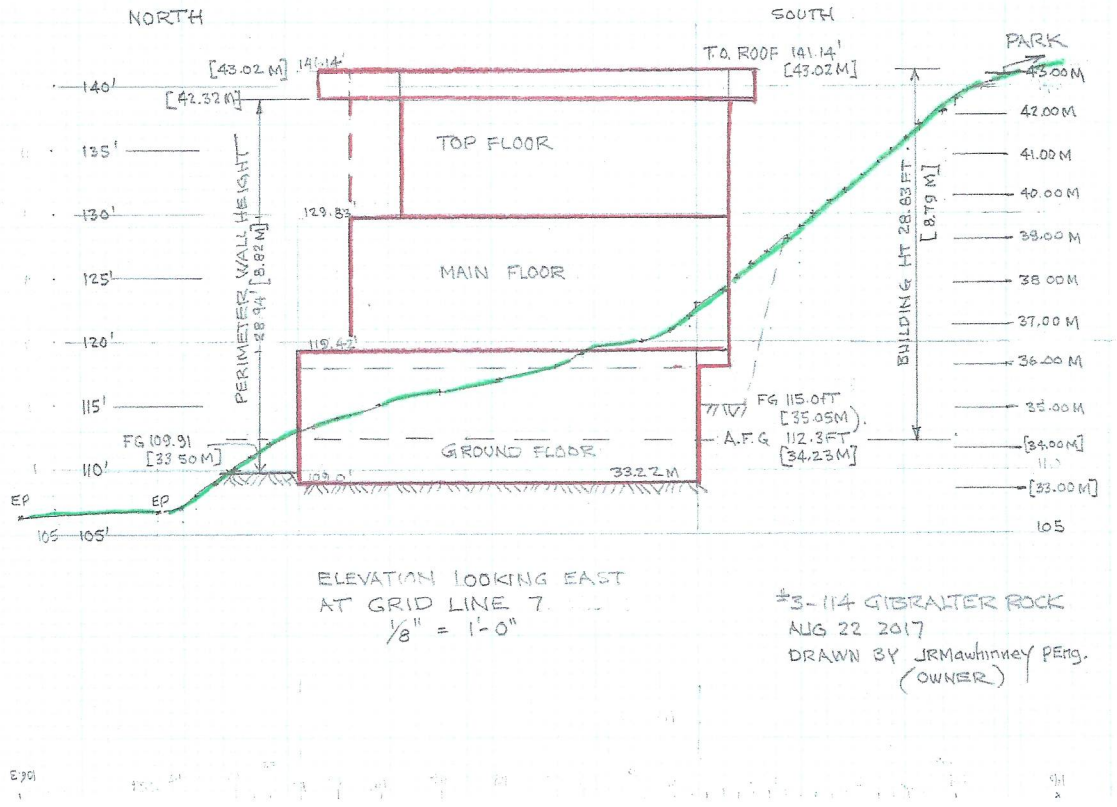


Fig. 3. Site profile at Grid Line 7 (face of East Wall) looking east.

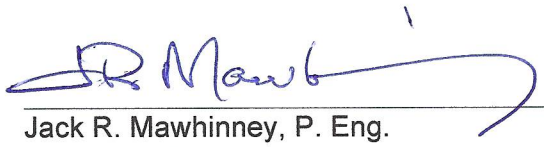
Construction is proposed as standard reinforced concrete foundations with slab on grade. Standard wood frame construction supporting both the multiple floor and roof structures. Exterior finishes will utilize industrial fire proof panels e.g. James Hardie panel and horizontal lap siding in complimentary colours, with prefinished metal flashings with Longboard 'v-groove' horizontal fascia and vented soffits. The roof system is intended to be a standard 2-ply membrane over an engineered roof joist assembly, with a minimal slope of rigid roof insulation to adequately direct water to designated roof drains. The water will run off into metal roof drains and prefinished mounted downpipes. Rain water leader assemblies will drain the external roofs to an underground collection pipe.

Landscape, Form and Character:

Landscape improvements for this property will include some stone or concrete retaining walls, granite stairs, with deer proof plants and groundcovers, in addition to ferns moss and wild plants. The services of a landscape architect have been secured. Extensive use of containers and a watering system will ensure that the flowers and trees survive drought conditions. A summer screened kitchen will open into a cliff-top Japanese garden at the SE face of the house and a dog run will be fenced on the SW side.

In summary, we hope you will find this application in order and can support our modest variance requests. They are smaller than those that were granted to Dr. Seltenrich. The house design proposed here has a smaller footprint, a lower profile, and a larger garden than the Seltenrich proposal. The site revisions we made have also eliminated the need for engineered retaining walls in the front corner, as the grade along the north façade can be achieved with natural rock walls less than 1.0 m in height.

Sincerely,



Jack R. Mawhinney, P. Eng.
APEG BC #117511

No views will be harmed by the proposed residence for 3-114 Gibralter Rock

View from 2-114 Gibralter Rock Today

View from 2-114 with proposed House indicated

View from Yard above the dog Run.

This House can barely see the Gibralter Rock culde-sac.

Their featured view is across the water towards Desolation Sound to the north.

The natural ravine and the park trees screen them from the proposed house.

The same is true for each of the houses on Glen Oakes Crescent.

3-114 Gibralter Rock will not Block any views from above.

ATTACHMENT F
LETTER OF SUPPORT FROM STRATA

Gibralter Rock Estates Strata VIS 5470
114-1 Gibralter Rock
Nanaimo, B.C. V9T 4M3

June 15, 2017

Ms. Tamera Rogers
City of Nanaimo Planning Department
455 Wallace Street
Nanaimo, BC V9R 5J6

Re: The Development Variance Application for
Lot 114-3 Gibralter Rock
Nanaimo, BC V9T 4M3

Dear Ms. Rogers;

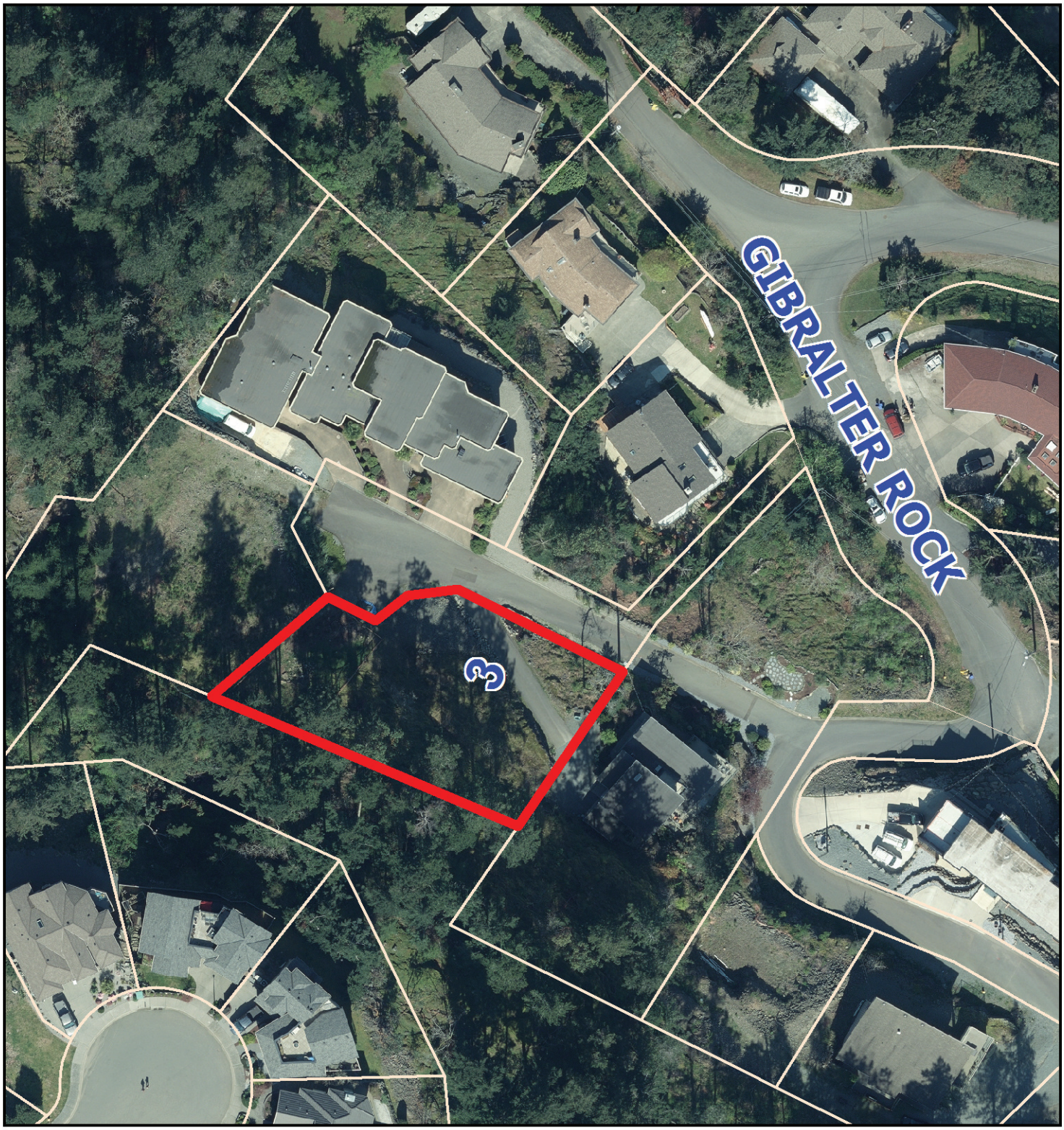
On behalf of the Gibralter Rock Estates Strata, VIS 5470, this letter confirms that the preliminary design for lot 114-3 is consistent with our Strata guidelines and by-laws. Our Strata has no objections to a flat or low slope roof design. We do not foresee the proposed location of the house nor the height variance requested in this application to be problematic. Furthermore, the height variance requested is exactly the same as the variance that was granted to the former owner, Dr. Sheltenrich in 2010.

Sincerely,

Mr. Chuck Dudek, President
114-1 Gibralter Rock

Mr. Al Benjamin,
Owner, Lot 114-2

ATTACHMENT G
AERIAL PHOTO



DEVELOPMENT VARIANCE PERMIT NO. DVP00318

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