



# **PLANNING COMMISSION AGENDA REPORT**

*U.1*

MEETING DATE: AUGUST 28, 2006

ITEM NUMBER:

SUBJECT: PLANNING APPLICATION PA-06-30  
170 EAST 18<sup>TH</sup> STREET

DATE: AUGUST 17, 2006

FOR FURTHER INFORMATION CONTACT: MEL LEE, AICP, SENIOR PLANNER  
(714) 754-5611

## **DESCRIPTION**

The applicant is requesting approval of a design review to construct three, 2-story, residential units.

## **APPLICANT**

The applicants are Hootan Hamedani and Sean Espahbodi, representing the owner of the property, Maryam Ershaghi.

## **RECOMMENDATION**

Approve by adoption of Planning Commission resolution, subject to conditions.

Handwritten signature of Mel Lee in black ink.

MEL LEE, AICP  
Senior Planner

Handwritten signature of R. Michael Robinson in black ink.

R. MICHAEL ROBINSON, AICP  
Asst. Development Services Director

Handwritten signature of Kimberly Brandt in black ink.

KIMBERLY BRANDT, AICP  
Principal Planner

**PLANNING APPLICATION SUMMARY**

Location: 170 E. 18<sup>th</sup> Street Application: PA-06-30

Request: Construct three 2-story residential units

**SUBJECT PROPERTY:**

**SURROUNDING PROPERTY:**

Zone:	<u>R2-HD</u>	North:	<u>Surrounding properties are zoned</u>
General Plan:	<u>High Density Residential</u>	South:	<u>residential and contain</u>
Lot Dimensions:	<u>75 FT x 125 FT</u>	East:	<u>residential uses</u>
Lot Area:	<u>9,375 SF</u>	West:	<u></u>
Existing Development:	<u>3 one-story residential units (to be demolished)</u>		

**DEVELOPMENT STANDARD COMPARISON**

<u>Development Standard</u>	<u>Required/Allowed</u>	<u>Proposed/Provided</u>
<b>Lot Size:</b>		
Lot Width (Development Lot)	100 FT	75 FT(1)
Lot Area (Development Lot)	12,000 SF	9,375 SF(1)
<b>Density:</b>		
Zone	1 du/3,000 SF	1 du/3,125 SF
General Plan	1 du/3,000 SF	1 du/3,125 SF
<b>Building Coverage (Development Lot):</b>		
Buildings	NA	4,076 SF (44%)
Paving	NA	1,452 SF (15%)
Open Space	3,750 SF (40%)	3,847 SF (41%)
TOTAL		9,375 SF (100%)
Building Height:	2 Stories/22 FT (For Flat-Roofed Buildings)(2)	2 Stories/22 FT, 6 IN (Majority) 24 FT, 6 IN (Portions)(3)
Chimney Height	NA	NA
First Floor Area (Including Garages)	NA	1,332 SF (Unit A) 1,415 SF (Unit B) 1,328 SF (Unit C)
Second Floor Area	NA	926 SF (Unit A) 1,193 SF (Unit B) 1,129 SF (Unit C)
2nd Floor% of 1st Floor (2)	80%	70% (Unit A) 84% (Unit B)(3) 85% (Unit C)(3)
Distance Between Buildings	10 FT	13 FT
<b>Setbacks</b>		
Front	20 FT	20 FT
Side (left/right) (2)	5 FT (1 Story) 10 FT Avg. (2 Story)	5 FT/5 FT 13 FT/9 FT(3)
Rear (Alley)	7 FT, 6 IN	7 FT, 6 IN
<b>Parking:</b>		
Covered	6	6
Open	6	6
TOTAL	12 Spaces	12 Spaces
Driveway Width:	16 FT	17 FT
Vehicle Backout	25 FT	25 FT

NA = Not Applicable or No Requirement

(1) The property is legal nonconforming

(2) Residential Design Guideline

(3) Does not comply with Residential Design Guideline (refer to staff report discussion)

CEQA Status Exempt, Class 3, New Construction

Final Action Planning Commission

## **BACKGROUND**

The site is bounded on all sides by existing multiple-family residential developments. The subject site contains an existing one-story triplex, which is proposed to be demolished to accommodate the proposed two-story, three unit, residential project.

The applicants have indicated the units will be sold as individual ownership units. If approved, a separate parcel map application would be required to be submitted and approved.

## **ANALYSIS**

The proposed units are a combination of two and three bedroom units. Unit A, at the front of the property, is a two bedroom unit, and units B and C, towards the rear of the property, are three bedroom units. All of the units are equipped with attached two car garages and open parking spaces. Driveway access for unit A is provided from E. 18<sup>th</sup> Street, and access for units B and C are provided from the public alley at the rear of the property. On-site parking complies with code requirements.

The proposed units are two-story flat roof structures. The City's Residential Design Guidelines recommend a maximum height of 22 feet for flat roofed structures; the proposed roof height is 22 feet, 6 inches with an additional two foot height for various vertical architectural elements on the facades. Additionally, the second-story area for units B and C exceed the 80% maximum of the first floor recommended in the guidelines (84% and 85%, respectively). Although the second story on the left (west side) has an average 13-foot side setback as recommended in the design guidelines, the second story setback on the right (east side) does not (9 feet is proposed).

It is staff's opinion, however, that the unique design of the project complies with the intent of the City's Residential Design Guidelines because the proposed design incorporates sufficient variation in building heights and forms, as well as variation in the depth of the floor plans, to alleviate building mass. Appropriate transitions between first and second floors have been made, as well as the provision of second floor offsets to avoid unrelieved two-story walls. Additionally, staff notes that several two-story multiple family residential buildings exist within the immediate area, including the abutting property to the east, directly across E. 18<sup>th</sup> Street to the south, and across the public alley to the north. As a result, it is staff's opinion that the scale of the project will be compatible with the neighborhood.

Privacy impacts on adjoining properties will be reduced due to the size and placement of second story windows to minimize visibility into abutting yards. Staff is recommending, as a condition of approval, that the second floor master bedroom decks on the east (right side) elevations for units A and C be eliminated to minimize visibility into the abutting second story residential windows on the adjoining property.

## **GENERAL PLAN CONFORMITY**

The property has a general plan designation of High Density Residential. Under the general plan designation, three residential units are allowed and three residential units are proposed. As a result, the use and density conforms to the City's General Plan

## **ENVIRONMENTAL DETERMINATION**

The project is exempt pursuant to Section 15303, New Construction, of the California Environmental Quality Act.

## **ALTERNATIVES**

The Commission has the following alternatives:

1. Approve the project as recommended by staff; or
2. Deny the project. The applicant could not submit substantially the same type of application for six months.

## **CONCLUSION**

It is staff's opinion that the project, as conditioned, will be compatible with surrounding properties. Therefore, staff recommends approval of the project.

Attachments:

1. Draft Planning Commission Resolution
2. Exhibit "A" - Draft Findings
3. Exhibit "B" - Draft Conditions of Approval
4. Applicant's Project Description and Justification
6. Location Map
7. Plans

cc: Deputy City Mgr.-Dev. Svs. Director  
Senior Deputy City Attorney  
City Engineer  
Fire Protection Analyst  
Staff (4)  
File (2)

Hootan Espahbodi  
P.O. Box 17685  
Irvine, CA 92623

Maryam Ershaghi  
1640 S. Sepulveda Blvd., #104  
Los Angeles, CA 90025

*H*

S.E.A.N. Design and Development  
P.O. Box 9544  
Newport Beach, CA 92658

File Name: 082806PA0639	Date: 081506	Time: 3:00 p.m.
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**RESOLUTION NO. PC-06-**

**A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY  
OF COSTA MESA APPROVING PLANNING APPLICATION PA-06-30**

THE PLANNING COMMISSION OF THE CITY OF COSTA MESA HEREBY  
RESOLVES AS FOLLOWS:

WHEREAS, an application was filed by Hootan Hamedani and Sean Espahbodi, representing the owner of the property, Maryam Ershaghi, with respect to the real property located at 170 E. 18<sup>th</sup> Street, requesting approval of a design review to construct three, 2-story, residential units; and

WHEREAS, a duly noticed public hearing was held by the Planning Commission on August 28, 2006.

BE IT RESOLVED that, based on the evidence in the record and the findings contained in Exhibit "A", subject to the conditions contained in Exhibit "B", the Planning Commission hereby **APPROVES** PA-06-30 with respect to the property described above.

BE IT FURTHER RESOLVED that the Costa Mesa Planning Commission does hereby find and determine that adoption of this resolution is expressly predicated upon applicant's compliance with each and all of the conditions contained in Exhibit "B". Should the applicant fail to comply with the conditions of approval, then this resolution, and the approval herein contained, shall be deemed null and void.

**PASSED AND ADOPTED this 28<sup>th</sup> day of August, 2006.**

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Bill Perkins, Chair  
Costa Mesa Planning Commission



## EXHIBIT "A"

FINDINGS

- A. The project complies with Costa Mesa Municipal Code Section 13-29(e) because:
- a. The development and use is compatible and harmonious with on surrounding properties.
  - b. Safety and compatibility of the design of the buildings and other site features, including functional aspects of the site development, have been considered.
  - c. The project is consistent with the General Plan designation of High Density Residential. Under this designation three dwelling units are allowed on the property and three units are proposed.
  - d. The planning application is for a project-specific case and does not establish a precedent for future development.
  - e. The cumulative effect of all planning applications has been considered.
- B. The information presented substantially complies with Costa Mesa Municipal Code Section 13-29(14) in that the proposed development complies with the City of Costa Mesa Zoning Code and meets the purpose and intent of the Residential Design Guidelines, which are intended to promote design excellence in new residential construction, with consideration being given to compatibility with the established residential community. This design review includes site planning, preservation of overall open space, landscaping, appearance, mass and scale of structures, location of windows, varied roof forms and roof plane breaks, and any other applicable design features. The visual prominence associated with the construction of a two-story structure has been reduced through appropriate transitions between the first and second floors and the provision of second floor offsets to avoid unrelieved two-story walls. Specifically, although the second floor slightly exceeds the 22 foot height limit, average second story side setback, and 80% second floor to first floor ratio recommended in the City's Residential Design Guidelines, the design includes various roof forms in the building elevations to provide visual interest, with appropriate transitions between the first and second stories. Privacy of the adjoining neighbors will not be impacted because windows and decks have been designed and /or conditioned to minimize direct lines-of-sight into yard areas and windows on neighboring properties.
- D. The project has been reviewed for compliance with the California Environmental Quality Act (CEQA), the CEQA Guidelines, and the City environmental procedures, and has been found to be exempt from CEQA under Section 15303 for New Construction.
- E. The project is exempt from Chapter XII, Article 3, Transportation System Management, of Title 13 of the Costa Mesa Municipal Code.

**EXHIBIT "B"****CONDITIONS OF APPROVAL**

- Plng. 1. Address assignment shall be requested from the Planning Division prior to submittal of working drawings for plan check. The approved address of individual units, shall be blueprinted on the site plan and on all floor plans in the working drawings.
2. Prior to issuance of building permits, applicant shall contact the U.S. Postal Service with regard to location and design of mail delivery facilities. Such facilities shall be shown on the site plan, landscape plan, and/or floor plan.
3. Street addresses shall be displayed on the building fascia adjacent to the main entrance or front door in a manner visible to the public street and/or alley. Street address numerals shall be a minimum 6 inches in height with not less than ½-inch stroke and shall contrast sharply with the background.
4. The second floor master bedroom decks on the east (right side) elevations for Units A and C shall be eliminated to minimize visibility into abutting second story residential windows.
5. The subject property's ultimate finished grade level may not be filled/raised unless necessary to provide proper drainage, and in no case shall it be raised in excess of 30 inches above the finished grade of any abutting property. If additional fill dirt is needed to provide acceptable on-site stormwater flow, an alternative means of accommodating that drainage shall be approved by the City's Building Official prior to issuance of any grading or building permits. Such alternatives may include subsurface tie-in to public stormwater facilities, subsurface drainage collection systems and/or sumps with mechanical pump discharge in-lieu of gravity flow. If mechanical pump method is determined appropriate, said mechanical pump(s) shall continuously be maintained in working order. In any case, development of subject property shall preserve or improve the existing pattern of drainage on abutting properties.
6. The applicant shall contact Comcast (cable television) at 200 Paularino, Costa Mesa, (888.255.5789) prior to issuance of building permits to arrange for pre-wiring for future cable communication service.
7. The conditions of approval, ordinance and code provisions of PA-06-30 shall be blueprinted on the face of the site plan as part of the plan check submittal package.
8. The applicant shall contact the Planning Division to arrange Planning inspection of the site prior to the release of occupancy/utilities. This inspection is to confirm that the conditions of approval and code requirements have been satisfied.
9. Demolition permits for existing structures shall be obtained and all work and inspections completed prior to final building inspections. Applicant is notified that written notice to the Air Quality Management District may be

- required ten (10) days prior to demolition.
10. Existing mature vegetation shall be retained wherever possible. Should it be necessary to remove existing vegetation, the applicant shall submit a written request and justification to the Planning Division. A report from a California licensed arborist may be required as part of the justification. Replacement trees shall be of a size consistent with trees to be removed, and shall be replaced on a 1-to-1 basis. This condition shall be completed under the direction of the Planning Division.
  11. Construction, grading, materials delivery, equipment operation or other noise-generating activity shall be limited to between the hours of 7 a.m. and 8 p.m., Monday through Friday, and between the hours of 8 a.m. and 6 p.m. on Saturday. Construction is prohibited on Sundays and Federal holidays. Exceptions may be made for activities that will not generate noise audible from off-site, such as painting and other quiet interior work.
  12. The striped area shown on the left side of parking space number 12 shall be replaced with a landscape planter, subject to review of the Planning Division.
  13. A separate planning application and parcel map shall be submitted if ownership units are proposed.
  14. Maintain the public right-of-way in a "wet-down" condition to prevent excessive dust and promptly remove any spillage from the public right-of-way by sweeping or sprinkling.
- Eng.

PLANNING DIVISION - CITY OF COSTA MESA

DESCRIPTION/JUSTIFICATION

Application #: PA-06-30

Environmental Determination: Exempt, Class 3

Address:

170 E. 18th St COSTA MESA

1. Fully describe your request:

- DEMO. EXISTING 3 UNITS RESIDENTIAL & RE-CONSTRUCT  
3 UNITS RESIDENTIAL.

2. Justification

A. For a Conditional Use Permit or Minor Conditional Use Permit: Describe how the proposed use is substantially compatible with uses permitted in the same general area and how the proposed use would not be materially detrimental to other properties in the same area.

B. For a Variance or Administrative Adjustment: Describe the property's special circumstances, including size, shape, topography, location or surroundings that deprive the property of privileges enjoyed by other properties in the vicinity under the identical zoning classification due to strict application of the Zoning Code.

3. This project is: (check where appropriate)

In a flood zone.

In the Redevelopment Area.

Subject to future street widening.

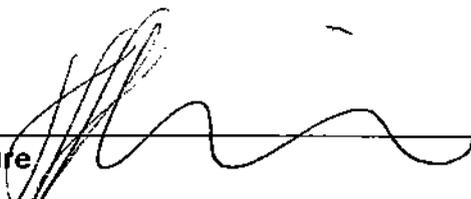
In a Specific Plan Area.

4. I have reviewed the HAZARDOUS WASTE AND SUBSTANCES SITES LIST published by the office of Planning and Research and reproduced on the rear of this page and have determined that the project:

Is not included in the publication indicated above.

Is included in the publication indicated above.

Signature



Date

05/18/06

# PA-06-30

## Legend

- Parcel Addresses
- Street Names
- Parcel Lines
- Ortho Photography
- Parcels







DATE SUBMITTED 05/17/09  
 DRAWN BY SUDHAKAR 07/05/08  
 CITY SUBMITTED 7/7/08  
 BLD SET 7/7/08



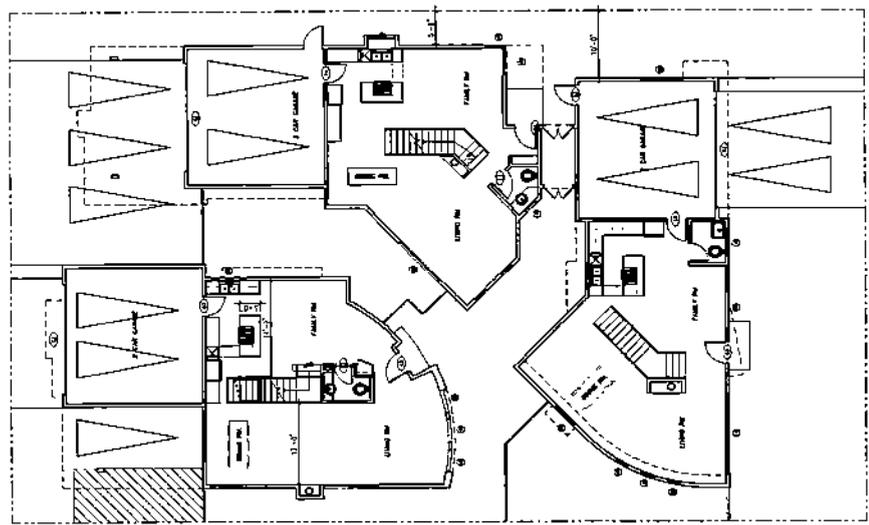
WESTSIDE  
 DEVELOPMENT

PROJECT  
 TWO-STORY  
 THREE UNITS  
 MULTIRESIDENTIAL  
 BUILDING

170 E 10TH ST. OREGON, OREGON  
 PROJ. # 06-0300  
 DRAWN BY T.H.  
 CHECKED BY H.H.  
 DATE: 01/25/08  
 SCALE AS NOTED

FIRST FLOOR  
 PLAN  
 A-11

1. PROVIDE CONSTRUCTION DETAILS FOR ALL INTERIORS
2. PROVIDE ABOVE CEILING SHALL HAVE MINIMUM AREA AS REQUIRED BY 2008 ASHRAE
3. PROVIDE ABOVE CEILING SHALL HAVE MINIMUM AREA AS REQUIRED BY 2008 ASHRAE
4. PROVIDE ABOVE CEILING SHALL HAVE MINIMUM AREA AS REQUIRED BY 2008 ASHRAE
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20. PROVIDE ABOVE CEILING SHALL HAVE MINIMUM AREA AS REQUIRED BY 2008 ASHRAE



PA-06-30

SCALE 1/8" = 1'-0"  
 8 PLAN GENERAL NOTES  
 FIRST FLOOR PLAN

ORD SUBMITTA 05/17/06  
 DRB RE-APPROVAL 07/26/06  
 CITY SUBMITTAL - / - /06  
 60 SET - / - /06



OWNER:

**WESTSIDE  
DEVELOPMENT**

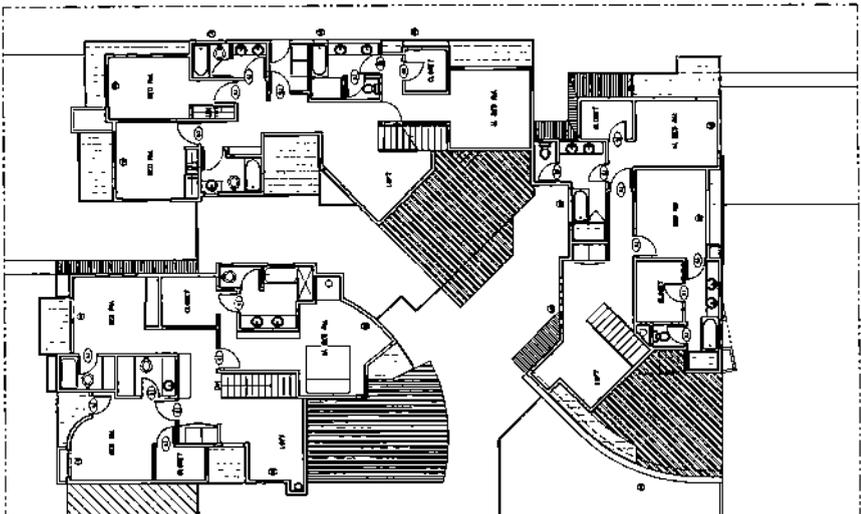
PROJECT:  
**TWO-STORY  
THREE UNITS  
MULTI-RESIDENTIAL  
BUILDING**

170 E 18TH ST. COSTA MESA  
 PROJ # EG-0200  
 DRAWN BY J.H.  
 CHECKED BY J.H.  
 DATE 01/25/06  
 SCALE AS NOTED

**SECOND FLOOR  
PLAN**

**A-12**

1. PROVIDE AN APPROVED APPROVAL FOR ALL WINDOW CLOSETS FOR ALL UNITS.
2. WINDOW AND BATHROOM ENLARGEMENTS MUST BE SAFETY GLASS AS REQUIRED BY IBC 703.10.1.3.0.
3. PROVIDE AN APPROVED APPROVAL FOR ALL WINDOW CLOSETS FOR ALL UNITS.
4. PROVIDE AN APPROVED APPROVAL FOR ALL WINDOW CLOSETS FOR ALL UNITS.
5. ALL WINDOW CLOSETS MUST BE PROTECTED BY A MINIMUM OF 1/2" THICK SOLID CORE LAMINATE GLASS WITH AN APPROVED APPROVAL FOR ALL WINDOW CLOSETS FOR ALL UNITS.
6. PROVIDE AN APPROVED APPROVAL FOR ALL WINDOW CLOSETS FOR ALL UNITS.
7. PROVIDE AN APPROVED APPROVAL FOR ALL WINDOW CLOSETS FOR ALL UNITS.
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13. PROVIDE AN APPROVED APPROVAL FOR ALL WINDOW CLOSETS FOR ALL UNITS.



*PA-06-30*

SCALE: 1/8" = 1'-0" 8 PLAN GENERAL NOTES

SECOND FLOOR PLAN

DBP SUBMITAL 05/17/06  
 OAB REC-SUBMITAL 07/13/06  
 CITY SUBMITAL - / - /06  
 PD SET - / - /06



OWNER

WESTSIDE DEVELOPMENT

PROJECT

TWO-STORY  
 THREE UNITS  
 MULTIRESIDENTIAL  
 BUILDING

130 E. 18TH ST. COSTA MESA

PROJ # 04-0300

DESIGN BY: R.H.

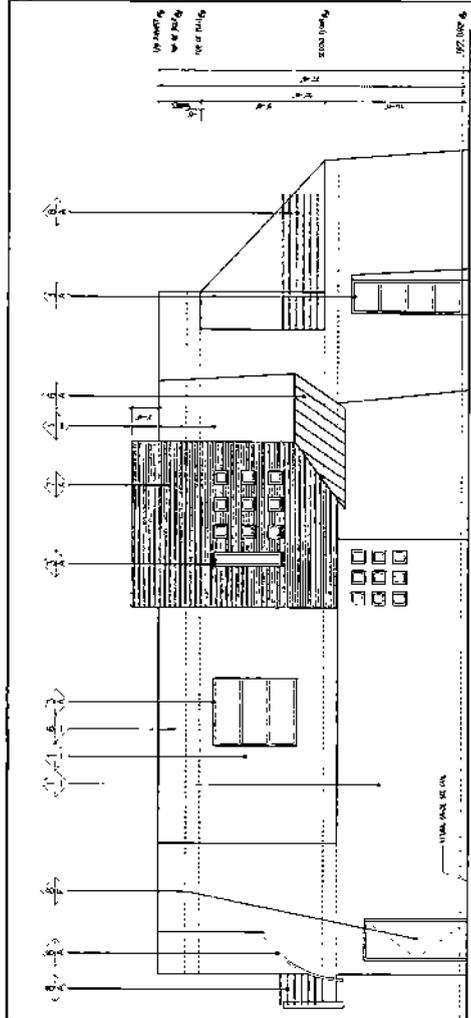
CHECKED BY: R.H.

DATE: 01/25/06

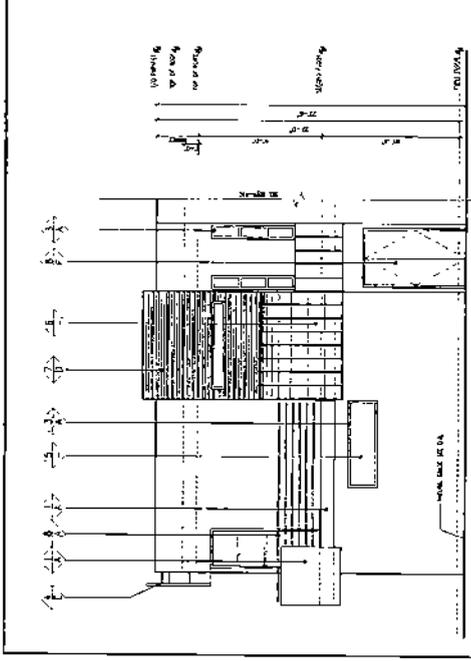
SCALE: AS NOTED

UNIT A  
ELEVATIONS

A-41.A



EAST ELEVATION SCALE 1/4" = 1'-0" 14 NORTH ELEVATION SCALE 1/4" = 1'-0" 2



WEST ELEVATION SCALE 1/4" = 1'-0" 16 SOUTH ELEVATION SCALE 1/4" = 1'-0" 4

MATERIAL		FINISH	
EXTERIOR CONCRETE FINISHES	CONCRETE CURB	CONCRETE CURB	CONCRETE CURB
EXTERIOR ALUMINUM FINISHES	ALUMINUM	ALUMINUM	ALUMINUM
EXTERIOR WOOD FINISHES	WOOD	WOOD	WOOD
EXTERIOR GLASS FINISHES	GLASS	GLASS	GLASS
EXTERIOR METAL FINISHES	METAL	METAL	METAL
EXTERIOR PAINT FINISHES	PAINT	PAINT	PAINT
EXTERIOR STONE FINISHES	STONE	STONE	STONE
EXTERIOR TERRAZZO FINISHES	TERRAZZO	TERRAZZO	TERRAZZO
EXTERIOR TILE FINISHES	TILE	TILE	TILE
EXTERIOR OTHER FINISHES	OTHER	OTHER	OTHER

PA-06-30

DMS SUBMITTAL 05/17/06  
 DMI AC-SUBMITTAL 07/03/06  
 CITY SUBMITTAL 1/1/06  
 BD SET 1/1/06



OWNER:

WESTSIDE DEVELOPMENT

PROJECT:

TWO-STORY  
 THREE UNITS  
 MULTIRESIDENTIAL  
 BUILDING

170 E. JOHN ST. COSTA MESA

PRJCT. # 04-020

ISSUED BY N.H.

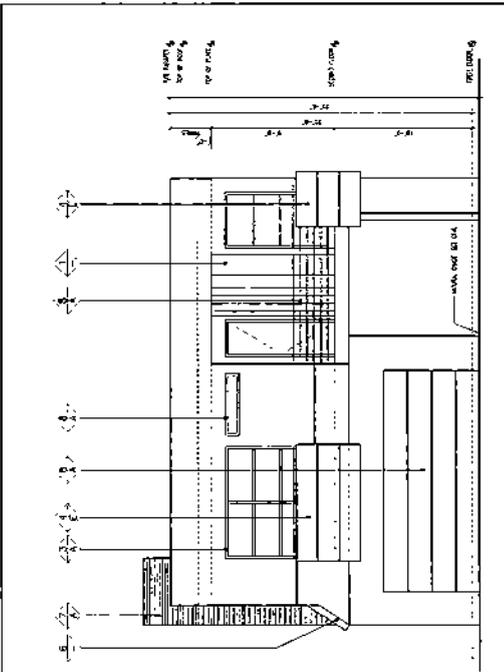
DRAWN BY N.H.

DATE 01/25/06

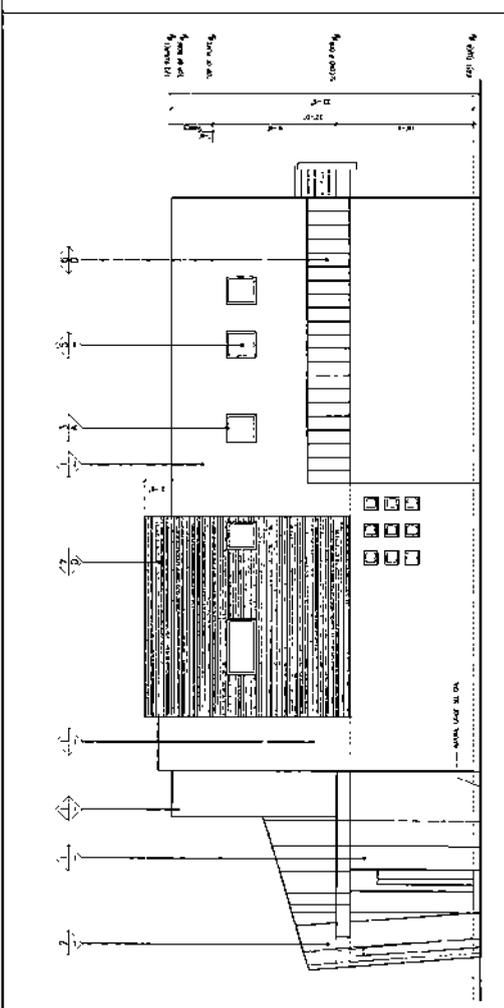
SCALE AS NOTED

UNIT B ELEVATIONS

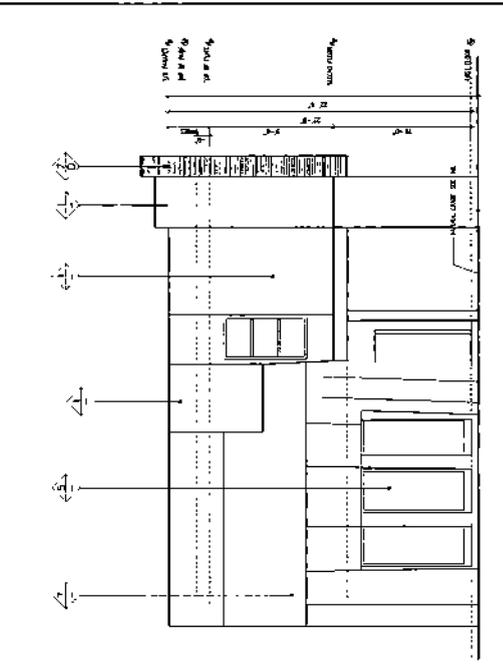
A-41.B



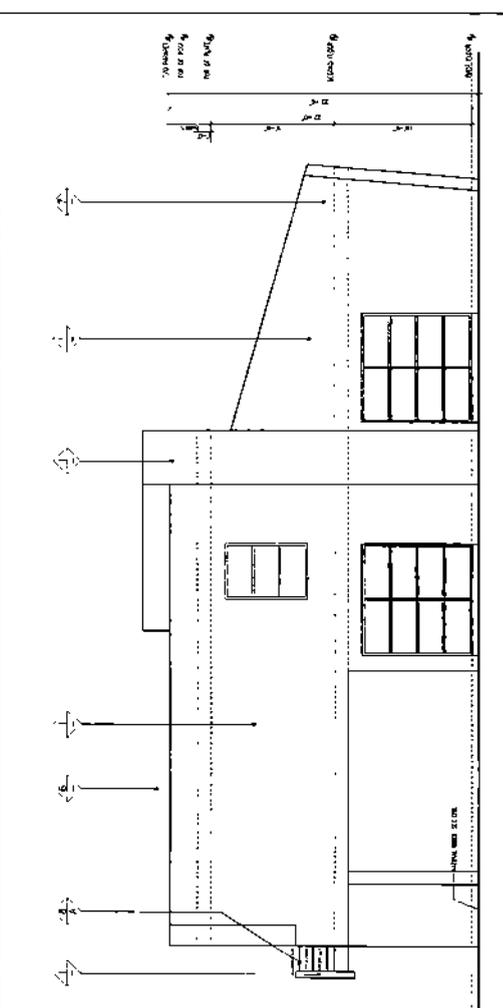
NORTH ELEVATION SCALE 1/4"=1'-0" 2



EAST ELEVATION SCALE 1/4"=1'-0" 10



SOUTH ELEVATION SCALE 1/4"=1'-0" 4



WEST ELEVATION SCALE 1/4"=1'-0" 12

MATERIALS AND FINISHES SCHEDULE	
MATERIAL	FINISH
1. EXTERIOR WALLS	1. STUCCO
2. EXTERIOR ROOF	2. ASPHALT/FLY
3. FLOORING	3. POLISHED CONCRETE
4. WALLS AND PARTIALS	4. PAINT
5. INTERIORS	5. PAINT
6. FLOORING AND PARTIALS	6. POLISHED CONCRETE
7. INTERIORS	7. PAINT
8. FLOORING AND PARTIALS	8. POLISHED CONCRETE
9. INTERIORS	9. PAINT
10. FLOORING AND PARTIALS	10. POLISHED CONCRETE
11. INTERIORS	11. PAINT
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57. INTERIORS	57. PAINT
58. FLOORING AND PARTIALS	58. POLISHED CONCRETE
59. INTERIORS	59. PAINT
60. FLOORING AND PARTIALS	60. POLISHED CONCRETE
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66. FLOORING AND PARTIALS	66. POLISHED CONCRETE
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91. INTERIORS	91. PAINT
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93. INTERIORS	93. PAINT
94. FLOORING AND PARTIALS	94. POLISHED CONCRETE
95. INTERIORS	95. PAINT
96. FLOORING AND PARTIALS	96. POLISHED CONCRETE
97. INTERIORS	97. PAINT
98. FLOORING AND PARTIALS	98. POLISHED CONCRETE
99. INTERIORS	99. PAINT
100. FLOORING AND PARTIALS	100. POLISHED CONCRETE

19-06-30

DBS SUBMITTAL 02/17/05  
 DBS RE-SUBMITTAL 07/05/06  
 CITY SUBMITTAL 11/1/06  
 BB SET 1/1/05

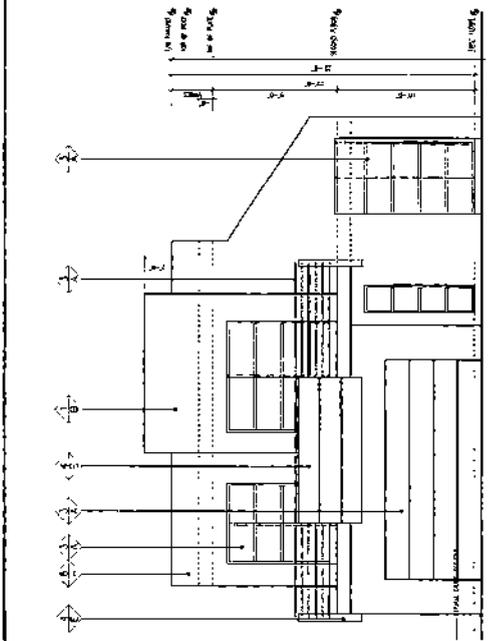


WESTSIDE  
 DEVELOPMENT

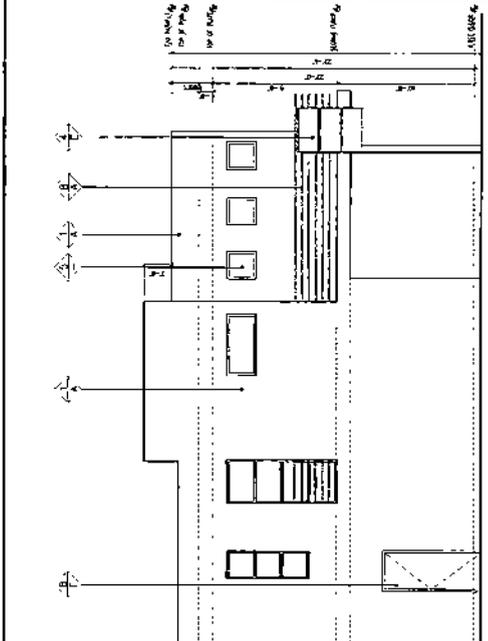
PROJECT:  
 TWO-STOREY  
 THREE UNITS  
 MULTIRESIDENTIAL  
 BUILDING

173 E 18TH ST. COSSA MESA  
 PHD/ F. 06-0900  
 DRAWN BY: H.H.  
 CHECKED BY: H.H.  
 DATE: 01/25/06  
 SCALE: AS NOTED

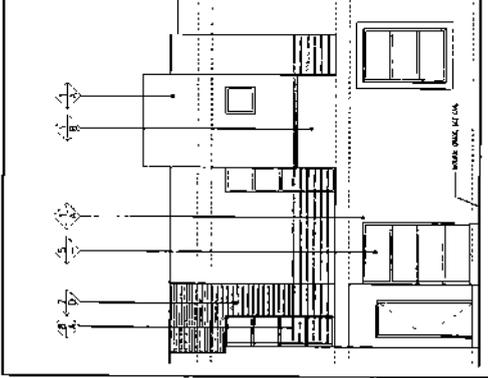
UNIT C  
 ELEVATIONS  
 A-41.C



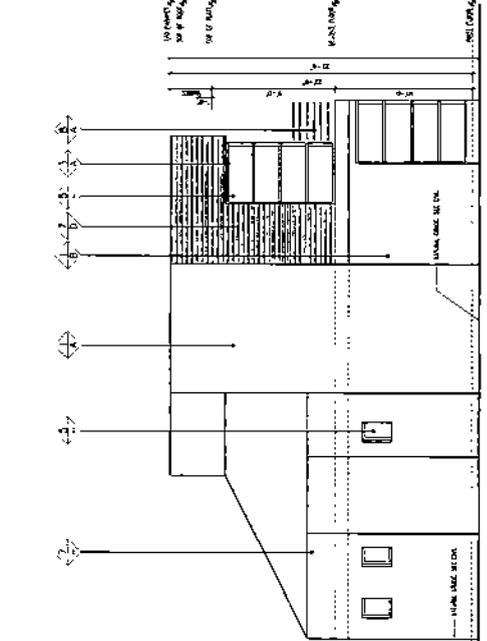
EAST ELEVATION SCALE 1/4" = 1'-0" 10 NORTH ELEVATION SCALE 1/4" = 1'-0" 2



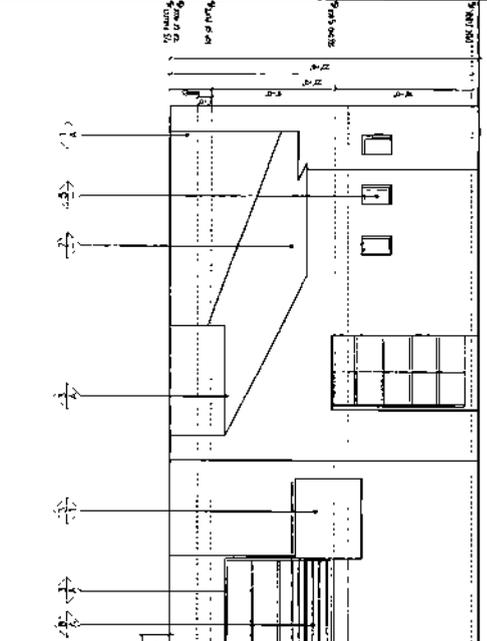
WEST ELEVATION SCALE 1/4" = 1'-0" 12 SOUTH ELEVATION SCALE 1/4" = 1'-0" 4



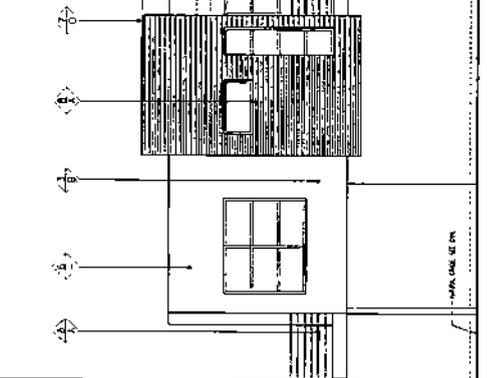
NORTH ELEVATION SCALE 1/4" = 1'-0" 2



SOUTH ELEVATION SCALE 1/4" = 1'-0" 4



WEST ELEVATION SCALE 1/4" = 1'-0" 12



EAST ELEVATION SCALE 1/4" = 1'-0" 10

MATERIALS AND FINISHES SCHEDULE	
MATERIAL	FINISH
1. EXTERIOR WALL FINISH	CONCRETE CMU
2. EXTERIOR WALL FINISH	PAINT, B&W
3. EXTERIOR WALL FINISH	PAINT, B&W
4. EXTERIOR WALL FINISH	PAINT, B&W
5. EXTERIOR WALL FINISH	CONCRETE CMU
6. EXTERIOR WALL FINISH	CONCRETE CMU
7. EXTERIOR WALL FINISH	CONCRETE CMU
8. EXTERIOR WALL FINISH	CONCRETE CMU
9. EXTERIOR WALL FINISH	CONCRETE CMU
10. EXTERIOR WALL FINISH	CONCRETE CMU
11. EXTERIOR WALL FINISH	CONCRETE CMU
12. EXTERIOR WALL FINISH	CONCRETE CMU
13. EXTERIOR WALL FINISH	CONCRETE CMU
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98. EXTERIOR WALL FINISH	CONCRETE CMU
99. EXTERIOR WALL FINISH	CONCRETE CMU
100. EXTERIOR WALL FINISH	CONCRETE CMU