

AGENDA ITEM NO: 7.12

MEETING DATE: September 26, 2023

STAFF REPORT – COVER SHEET

SUBJECT: Joe Dhaliwal
Rezoning, Development Variance Permit
& Development Permit / 7990 Lickman
Road

DATE: September 13, 2023

DEPARTMENT: Planning Department
RZ001662, DVP01343 & DP001712

PREPARED BY: Adam Roberts / cc

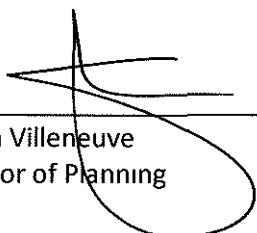
1. SUMMARY OF ISSUE:

The applicant requests to rezone a portion of the subject property from a CS2 (Tourist Commercial) Zone to an M2 (Service Industrial) Zone and a portion from an M1 (Light Industrial) Zone to an M2 Zone to facilitate a combination industrial and hotel development. Once the Bylaw has been to Public Hearing, staff recommend that Council hold the Bylaw at Third Reading pending approval by the Ministry of Transportation and Infrastructure with respect to the property located at 7990 Lickman Road.

A concurrent Development Variance Permit application has been submitted to vary Zoning Bylaw standards as detailed within the report. As the property is within Development Permit Area No. 7 (Industrial Development), a Development Permit for “form and character” is required and further described within the report.

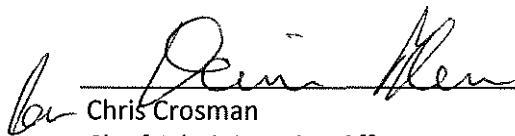
2. RECOMMENDATION:

Recommendation that “Zoning Bylaw Amendment Bylaw 2023, No. 5349”, which proposes to rezone a portion of the subject property from a CS2 (Tourist Commercial) Zone to an M2 (Service Industrial) Zone and a portion from an M1 (Light Industrial) Zone to an M2 (Service Industrial) Zone, be given first and second reading; and further, that a Public Hearing be called for October 10, 2023. (RZ001662)


Gillian Villeneuve
Director of Planning

**3. CHIEF ADMINISTRATIVE OFFICER'S
RECOMMENDATION/COMMENTS:**

Supports recommendation.


Chris Crosman
Chief Administrative Officer

**STAFF REPORT ON REZONING RZ001662, DEVELOPMENT VARIANCE PERMIT DVP01343 &
DEVELOPMENT PERMIT DP001712 APPLICATIONS**

PREPARED BY: Adam Roberts DATE: September 13, 2023

POSITION: Planner III DEPARTMENT: Planning Department

1. DEFINITION OF ISSUE:

The applicant requests to rezone a portion of the subject property from a CS2 (Tourist Commercial) Zone to an M2 (Service Industrial) Zone and a portion from an M1 (Light Industrial) Zone to an M2 Zone to facilitate a combination industrial and hotel development. Once the Bylaw has been to Public Hearing, staff recommend that Council hold the Bylaw at Third Reading pending approval by the Ministry of Transportation and Infrastructure with respect to the property located at 7990 Lickman Road.

The applicant has submitted a concurrent Development Variance Permit application (DVP01343) that requests the following departures to Zoning Bylaw standards:

- reduce the minimum required lot width within the CS2 Zone from 25m to 16m for the proposed hotel lot;
- reduce the minimum required lot width within the M2 Zone from 15m to 7.5m for the proposed industrial lot;
- waive the requirement to provide a 0.6m overhang when a parking space is located adjacent to a building, fence or sidewalk;
- waive the requirement to provide a 1.5m wide sidewalk located outside of a maneuvering aisle;
- waive the requirement to landscape the front setback area for the proposed industrial lot;
- waive the requirement that landscape beds within parking areas be at least 5m² for the proposed hotel lot;
- reduce the minimum interior landscaping of a parking lot area from 7% to 3.7% for the proposed industrial lot;
- increase maximum building height from 20m to 20.9m for a portion of the hotel;
- reduce the minimum required number of loading spaces from 5 to 2 for the proposed hotel lot; and,
- increase the maximum permitted copy area for a sign from 20m² to 27m².

As the property is within Development Permit Area No. 7 (Industrial Development), a Development Permit for "form and character" has been submitted for concurrent review.

2. PROPOSAL:

A summary of the proposed hotel and industrial developments has been provided below:

Hotel Development

- A 5-storey, 72-unit hotel (3998m²);
- 72 parking spaces (72 spaces are required) and sufficient bicycle parking; and,
- sufficient landscaping including 28 trees (24 are required).

Industrial Development

- 3 multi-unit industrial buildings totaling 5,656m²;
- 86 parking spaces (82 are required) and sufficient bicycle parking; and,
- 73 trees (34 are required).

The applicant requests to rezone the centre portion of the subject property from a CS2 Zone to an M2 Zone and the rear portion from an M1 Zone to an M2 Zone to facilitate a combination industrial and hotel development. The proposal is in keeping with the existing “General Industrial” designation of the Official Community Plan. Furthermore, the proposal is in keeping with the redevelopment trend and existing character of the area.

The final lot layout must comply with City Bylaws and include 3.9m road dedication and 2.5m supplementary setback (6.4m total) along Lickman Road. A 6m Right of Way (measured from top of bank) is required to be registered over the north and east property lines affected by McDermott Ditch, to allow for City maintenance purposes. In addition, a “No Left Turn” Covenant is required. The requirements of the Tree Management (Land Development) Bylaw and Floodplain Regulation Bylaw apply to the development.

3. DISCUSSION REGARDING VARIANCES:

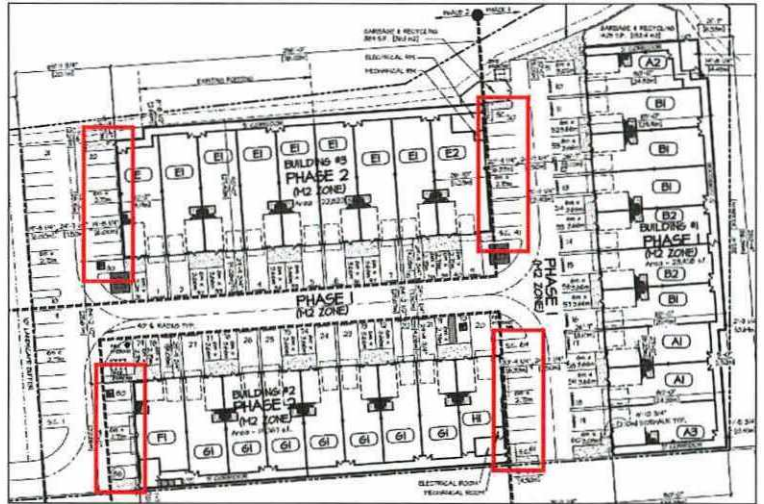
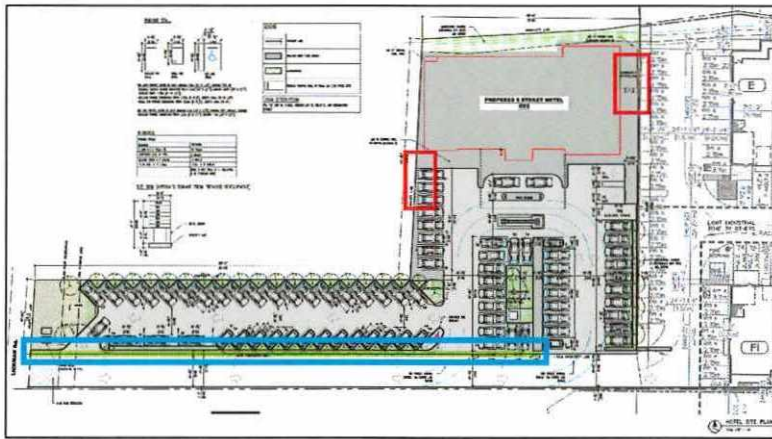
Overall, the design of the buildings and site is visually appealing and constitutes a high-quality addition to the area. A discussion in relation to the proposed variances is provided below.

Lot Width

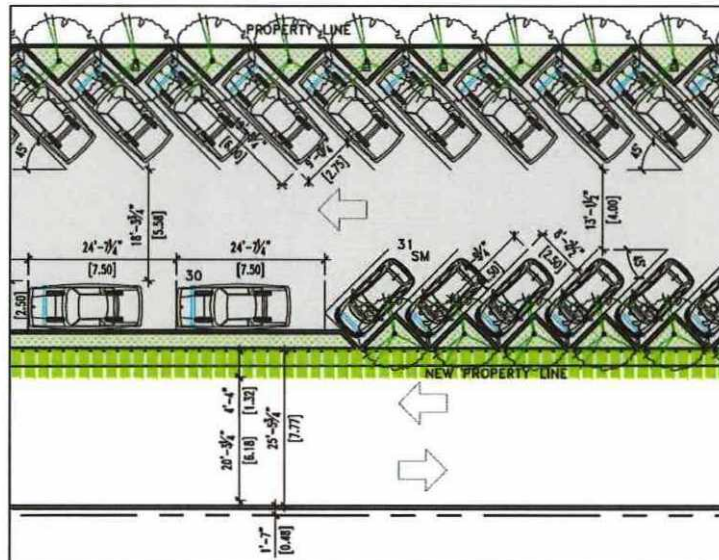
The applicant requests a reduction to the minimum lot width from 15m to 7.5m for the proposed industrial lot and from 25m to 16m for the proposed hotel lot. The current lot orientation includes 24m frontage onto Lickman Road and, although not considered a panhandle, the property functions as one given that it wraps behind the adjacent gas station located at 8032 Lickman Road. As such, to facilitate redevelopment of the subject property, a panhandle-style development is proposed with a subdivision to separate the hotel and industrial buildings. To ensure one driveway access is maintained to access Lickman Road, the applicant wishes to register a shared access easement over the 7.5m shared driveway for use by both lots. Considering that one driveway access is maintained and will be shared between the two proposed developments, the requested variance is considered minor in nature with no anticipated impact on the surrounding area.

Parking Space Overhang

The applicant requests to waive the requirement to provide a 0.6m landscape bed for vehicle overhang when a parking space is located adjacent to a building, fence or sidewalk in various location throughout both the industrial and hotel lots. As shown below in red, within the industrial lot, 6m long parking spaces have been provided at each end of building 2 and 3 without a raised landscape bed. For the hotel lot, a portion of the sidewalk along the west property line narrows to less than 0.6m. In addition, the spaces located along the east property line do not have a 0.6m buffer adjacent to the hotel's garbage enclosure.

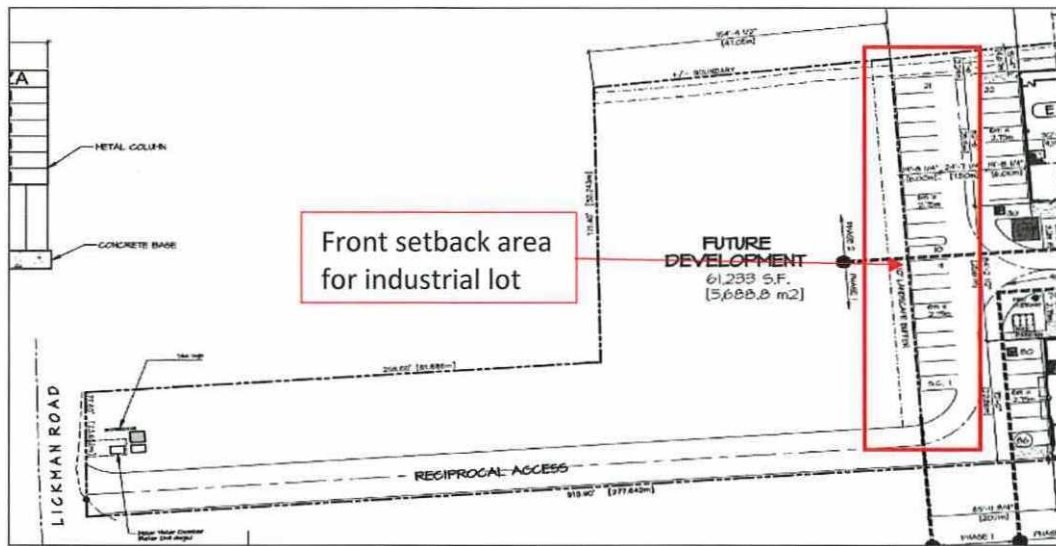


The applicant also requests to waive the requirement to provide a 1.5m wide sidewalk located outside of a maneuvering aisle. To ensure pedestrian connectivity is provided from Lickman Road, the applicant has provided a 1.3m wide painted pathway located within the required 7.5m maneuvering aisle as highlighted in blue above. The Zoning Bylaw requires pedestrian pathways to be at least 1.5m wide and located outside of maneuvering aisles. Given the constraints related to the existing orientation of the lot, the applicant has indicated they are unable to provide a separate pedestrian pathway from Lickman Road given the requirements for off-street parking, maneuvering and landscaping. As the surrounding area is primarily industrial in nature, with few amenities within walking distance, pedestrian movement within the site to Lickman Road is expected to be limited. As such, the painted pedestrian pathway will likely be sufficient to manage pedestrian traffic on site.



Landscaping

The applicant requests to waive the requirement to landscape the front setback area for the proposed industrial lot only. The Zoning Bylaw requires 40% of front setback area to be landscaped to ensure an appealing streetscape and screening is provided along property frontages. This standard has been met along Lickman Road for the proposed hotel lot, however, the proposed industrial lot does not meet this requirement. As the industrial lot is considered a panhandle, the front lot line (as shown below) is not adjacent to Lickman Road but rather is located to the rear of the proposed hotel site. As such, in order to ensure the two sites include clear access and movement between properties, the applicant has requested to waive the landscape requirement along this shared property line. In addition, as this area is not visible from the street, the requested variance is supportable and not anticipated to impact the surrounding area.



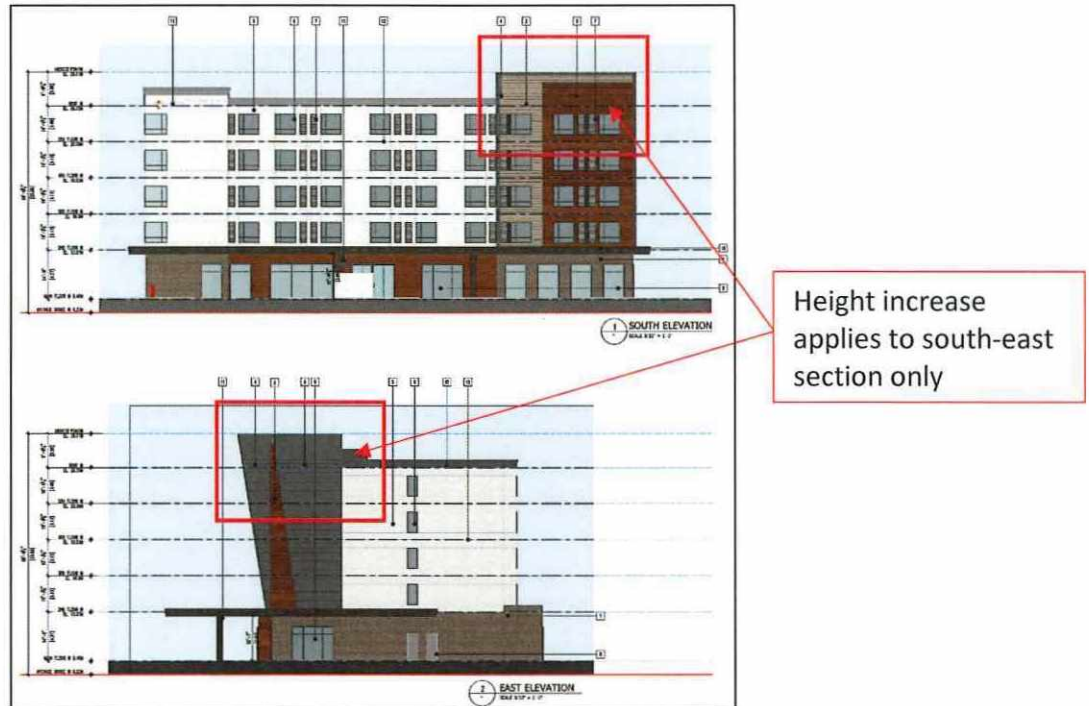
The applicant requests to waive the requirement that landscape beds within parking areas be at least 5m² for the hotel lot only. Given the constraints related to the existing lot orientation, the applicant has provided landscape beds within the panhandle portion of the hotel lot that are only 3.1m². Despite this, the minimum 1.5m dimension requirement is still met and the applicant has provided trees within each bed within structural soil to ensure survival. Further, all minimum landscaping ratios for the hotel lot are exceeded.

The applicant also requests to reduce the minimum interior landscaping of a parking lot area from 7% to 3.7% for the proposed industrial lot only. The overall landscaping requirements for the industrial lot are met; however, only 3.7% of the parking lot area is landscaped. Further, landscaped beds of sufficient size have been provided throughout the industrial lot to break-up the parking area providing visual relief throughout the space.

Despite the requested variances, the proposed development exceeds the minimum overall landscaping and tree planting requirements. Although the above-mentioned standards are not met, the intent of the landscaping requirements within the Zoning Bylaw are considered met in this instance. Given the irregular lot orientation and size of the property, the variances are considered supportable and not anticipated to impact the proposed development or surrounding area.

Building Height

The applicant requests an increase to maximum building height from 20m to 20.9m to accommodate the proposed 5-storey hotel. As shown below, the height increase only applies to the southeast section of the hotel to accommodate increased building articulation and architectural features. As the requested increase is considered minimal and only applies to the architectural feature, the requested variance is considered supportable in this instance.



Off-Street Loading Space

The applicant requests to reduce the required number of off-street loading spaces from 5 to 2 for the proposed hotel lot. As the Zoning Bylaw requires 1 loading space per 1,000m² for all commercial uses, the proposed hotel requires 5 loading spaces. Despite this, the anticipated demand for loading spaces is much lower for a hotel than a multi-unit commercial development. As such, the requested reduction is supportable in this instance as two loading spaces is considered adequate for a hotel use.

Sign Bylaw

The applicant has requested to increase the total copy area for a free-standing sign from 20m² to 27m² to provide adequate space for future tenants to advertise their business. Given the number of industrial units proposed, the applicant submits that additional copy area is necessary to allow each tenant the opportunity for space on the sign. As the total height of the sign will remain at 10m, the increased copy area is not anticipated to impact the surrounding area. An additional Development Permit application to approve the form and character of the free-standing sign will be required prior to installation to ensure the sign design is consistent with the design guidelines for DPA 7 to be reviewed by the Director of Planning.

4. DEVELOPMENT PERMIT CONSIDERATIONS:

As demonstrated by the attached checklist evaluation for DPA 7, the proposed development substantially complies with the Industrial Design Guidelines. A copy of the proposed site plan, landscape plan and colour elevations are attached within the draft Development Permit for information.

Summary and CPTED Review

In support of the application, the applicant has submitted a CPTED (Crime Prevention Through Environmental Design) report prepared by *AMR Systems*. A summary of the CPTED assessment is shown in the table below:

CPTED Elements	Recommendations	
	✓ included in the design	✗ not included in the design
Natural Access Control	<ul style="list-style-type: none"> ✓ Clearly identified entrances to all buildings promotes natural access control. ✓ Pedestrian access from Lickman Road to both the hotel and industrial buildings is achieved from a painted pedestrian pathway within the maneuvering aisle. A variance has been requested to waive the requirement that a pedestrian pathway be provided outside of the maneuvering aisle. 	
Natural Surveillance	<ul style="list-style-type: none"> ✓ The use of windows on both the hotel and industrial buildings will promote “eyes on the street”. ✗ Given the panhandle access to the industrial buildings, there is a lack of natural surveillance outside of normal working hours for the industrial portion of the property. 	
Territoriality	<ul style="list-style-type: none"> ✓ Maintenance of landscaping within the hotel lot is important as the hotel creates a “gateway” to the industrial buildings and well-maintained vegetation will demonstrate a defensible space* 	
Maintenance	<ul style="list-style-type: none"> ✓ The vegetation on the site should be maintained to provide long sightlines from the street and ensure public and private spaces are well defined. Any damage or vandalism should be repaired within a timely manner* 	

* Future strata/hotel owner to maintain vegetation and ensure sightlines are not obstructed.

5. DESIGN REVIEW ADVISORY COMMITTEE:

The application was reviewed by the Design Review Advisory Committee (DRAC) on September 12, 2023. Based on this, the following recommendation was made:

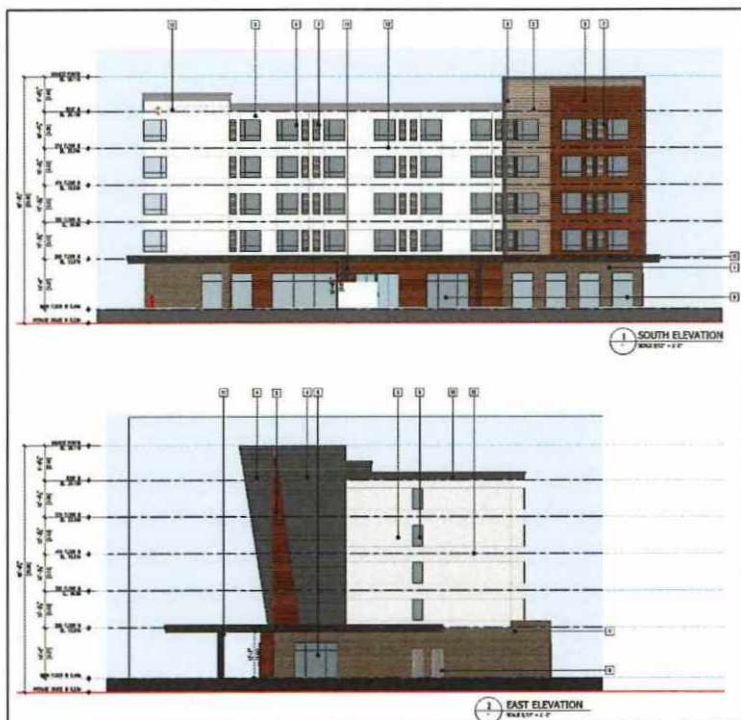
That the Design Review Advisory Committee supports DP001712 and recommend Council approve the application subject to the following conditions:

1. *that a detailed lighting plan be submitted, prior to the issuance of a Building Permit, to ensure adequate lighting is provided for all walkways, parking areas and pedestrian entrances;*
2. *that all utility equipment be screened from public view through installation of landscaping fencing, or vinyl wrapping;*
3. *that an irrigation system be included into the landscaped areas within the site;*
4. *that any rooftop equipment such as heaters, mechanical units, air conditioners, etc. should be located near one another, buffered to reduce noise and screened from view;*
5. *that any chain link fencing provided be black;*
6. *that a painted pedestrian pathway be provided in various locations throughout the site including from the front entrance of the hotel to the nearest sidewalk and along the front of each industrial building to connect each unit; and,*
7. *that additional colour and/or materials be incorporated into the southeast corner elevation of the hotel building to create greater visual interest and break up the overall massing of the structure.*

In response to condition 7, the applicant has provided updated elevations, shown below, to ensure additional colour and materials are incorporated into the southeast corner of the hotel. As such, condition 7 has been removed from the draft permit.

The applicant was present at the meeting and agreeable to the remaining conditions.

Previous Elevations



Revised Elevations



6. FACTORS:

6.1 2040 Official Community Plan (OCP) / Land Use

OCP: “General Industrial” as designated within the 2040 Official Community Plan.

Land Use: A previously approved industrial building is under construction at the rear of the property. This building will remain and has been incorporated into the current proposal.

6.2 Neighbourhood Character

The subject property is located within the Village West neighbourhood, north of the Lickman Road Highway 1 interchange, and is surrounded by a variety of land uses including:

North: A restaurant, cannabis retail store and a hotel (Hampton Inn) within the CS2 and C8 (Cannabis Retail) Zones.

West: A Service Station (Husky) within a CS2 Zone. Further to the west on the opposite side of Lickman Road is a bare lot within the M3 (General Industrial) Zone, a liquor store, a cannabis retail store and Tim Hortons within the CS2, C7 (Liquor Store) and C8 Zones.

East: Industrial uses within the M3 Zone.

South: Two commercial vehicle service stations (Shell Flying J & Chevron Cardlock) within the CSM (Service Commercial Industrial) Zone and the M2 Zone.

6.3 Technical Issues

Floodplain: The subject property is located within the protected floodplain and subject to the Floodplain Regulation Bylaw.

Watercourses: A “Class A” drainage ditch known as McDermott Ditch runs along the property’s northern property line. A Development Permit Area 3 – Riparian Areas has been issued which reduced the required setback from this watercourse from 30m to 2m. The applicant’s conceptual Site Plan indicates that this minimum setback will be provided.

Geotechnical Issues: The property is not subject to any known geotechnical hazards or earthquake related risks.

Ministry of Transportation and Infrastructure: In accordance with Section 505 of the *Local Government Act*, a local government is required to refer land use permits for the construction of commercial or industrial buildings exceeding 4500m² in gross floor area to the minister responsible for the administration of the *Transportation Act* when the proposed development is within 800m from a controlled area. As such, the subject Development Permit was referred to the Ministry of

Transportation and Infrastructure (MOTI). A response was received indicating that the MOTI has no objections or comments regarding this building design or site layout.

In accordance with Section 52 of the *Transportation Act*, anyone who wishes to change the land use of a property in a controlled area needs a separate zoning approval from the MOTI. As such, the amendment bylaw must be held at Third Reading pending approval by the MOTI.

6.4 Conditions of Issuance

Staff support the requested variances as proposed by the applicant and recommend approval of the draft DVP and DP, subject to the recommendations of the Design Review Advisory Committee and the conditions as stipulated within the draft Development Variance Permit and Development Permit.

7. RECOMMENDATION & SUBSTANTIATION:

Recommendation:

Recommendation that “Zoning Bylaw Amendment Bylaw 2023, No. 5349”, which proposes to rezone a portion of the subject property from a CS2 (Tourist Commercial) Zone to an M2 (Service Industrial) Zone and a portion from an M1 (Light Industrial) Zone to an M2 (Service Industrial) Zone, be given first and second reading; and further, that a Public Hearing be called for October 10, 2023. (RZ001662)

Substantiation:

The proposed rezoning is consistent with the OCP designation and it is anticipated that the proposed development will complement and enhance the existing character of the area. The requested variances are supportable and not anticipated to significantly impact neighbouring properties or the neighbourhood as a whole.

The proposed development meets the intent of the Design Guidelines for Development Permit Area No. 7. The proposed buildings and associated landscaping have been designed to ensure a positive relationship between the building, open spaces, surrounding properties and the street.

8. DEVELOPMENT PERMIT AREA NO. 7 DESIGN GUIDELINE CHECKLIST:

Design Guidelines		Yes/No	Comments
1.	Building form and character		
1.1	All structures are comprehensively planned and architecturally coordinated	Yes	The proposed development is architecturally coordinated and creates an easily identifiable façade that integrates well with neighbouring industrial developments
1.2	Consideration is given to relationship between buildings and open space, circulation patterns, and design compatibility with surrounding buildings and streets	Yes	The proposed development features a defined and efficient vehicle and pedestrian circulation network; shape and massing are consistent with industrial buildings on neighbouring properties.
1.3	Building(s) are oriented toward the street with an emphasis on glazing, and designed to create visually enhanced streetscapes	Partial	Due to the irregular lot shape, the majority of the development is pulled back from the street with the buildings facing internal to the site. Ample glazing and architectural details have been incorporated into the design to enhance the appearance of the buildings on site.
1.4	Building design, materials, exterior finishes and landscaping support the creation of an attractive, high quality estate industrial environment	Yes	The proposed buildings feature modern design with high-quality materials, articulation, and landscaping
1.5	Building design, layout, siting, landscaping, screening and buffering are designed to mitigate noise from Hwy #1 and between industrial/commercial uses	N/A	Building is not adjacent to Hwy #1.
1.6	Buildings on corner lots, or fronting more than one road, give design consideration to each frontage	N/A	The property is not located on a corner.
1.7	Low profile building designs are incorporated, particularly adjacent to Hwy #1	N/A	Building is not adjacent to Hwy #1
1.8	Box-like structures with little surface articulation and long expanses of uninterrupted roof lines are avoided	Partial	Although the proposed industrial buildings have an overall box-like appearance, the use of offset rooflines, significant glazing and varied colours soften the appearance of the development and creates visual interest. Considering this, the intent of the design guideline is considered met in this instance.
1.9	Loading bays and service compounds are screened or minimally visible from the public view	Yes	The loading bay doors are not visible from public view
1.10	Materials are of high quality, untreated or unfinished concrete, metal and/or prefabricated metal structures are not used	Yes	Materials for the industrial buildings include: grey, black and white tilt-up concrete panels, Black fiber-cement fascia panels and metal and glass canopies Materials for the hotel include smooth cement siding (red), horizontal cement siding (gun-smoke), aluminum panel siding (slate grey), EIFS (stucco) siding (Lace Falls – white), brick (Garnet) and black vinyl windows and doors.
1.11	Roof top equipment is positioned to minimize exposure or properly screened	No	The plans do not indicate if any rooftop equipment is proposed. As such, a recommended condition requires that if any rooftop equipment is visible from the street it will be positioned to minimize exposure or be adequately screened

1.12	Public entrance is clearly identified and accessible from the street	No	Due to the proposed panhandle access to both the hotel and industrial buildings, direct pedestrian access from Lickman Road is not possible. As such, the applicant has provided a painted pedestrian pathway within the maneuvering aisle to direct pedestrians to the entrance of the hotel. Further connection to the industrial buildings from Lickman Road has not been provided. Despite this, access to the industrial buildings by pedestrians is expected to be minimal as the majority of traffic to the rear of the property will be from vehicles.
1.13	Garish or neon colours are not used	Yes	A monochromatic colour scheme is proposed.
2.	General		
2.1	Buildings and open space are well integrated, Minimize untreated space	Yes	The site has been comprehensively planned and is well integrated with no "leftover" space.
2.2	Vehicle and pedestrian routes are clearly defined	Partial	Vehicle parking and maneuvering spaces are clearly separated from pedestrian routes through raised sidewalks and painted pathways. Despite this, the pathway from Lickman Road is not 1.5m wide, nor located outside of the 7.5m maneuvering aisle.
2.3	Garbage and recycling facilities located away from street and screened from public view	Yes	The garbage and recycling facilities are located away from the street and screened from view
3.	Parking		
3.1	Parking provided at back and side of property	Partial	Parking is provided throughout the site, with very little being visible from Lickman Road. The parking that is located within the panhandle portion of the hotel lot is screened by substantial landscaping along Lickman Road
3.2	Parking and loading areas facilitate safe and efficient vehicle and pedestrian movement	Partial	Maneuvering aisles of sufficient size are provided for vehicle circulation; pedestrian sidewalks have been provided adjacent to all building entrances and throughout the site. A recommended condition has been included to provide painted pedestrian pathways along the frontage of each industrial building to provide safe pedestrian movement between units
3.3	Parking areas screened from street	Yes	Landscaping throughout the site screens the parking areas and serves to soften the visual impact of these areas.
4.	Screening & Landscaping		
4.1	Berms, shrubs, beds, low walls and plantings used to screen unaesthetic features	Yes	Landscape beds and shrubs provide screening from the street and throughout the property.
4.2	Landscaping creates visual interest along the street frontage and entire development with variety throughout the year	Yes	Ample landscaping has been included along the Lickman Road frontage providing visual interest from the street. Landscape beds along the buildings and throughout the parking area provide visual interest.
4.3	Landscaping creates an attractive high-quality development	Partial	The proposed landscaping is attractive and has a positive impact on the development. Despite this, minimum Zoning Bylaw standards in relation to landscaping have not been met. This includes the minimum size of landscape beds on the hotel site and minimum parking lot landscaping for the industrial site.
4.4	Street trees along road frontage are in compliance with the Tree Management Bylaw	Yes	The minimum number of trees required Tree Management Bylaw has been exceeded for both the hotel and industrial sites.
4.5	Landscaping includes decorative fence design (black chain-link fencing hidden within landscaping may be provided, plain	No	Details of the fencing material and colour have not been identified on the site plan. As such, a recommended condition requires all chain-link fencing to be black.

	chain-link fencing along street frontage is avoided)		
4.6	Natural vegetation or berming adjacent to Hwy #1 not removed unless approved by Development Permit	N/A	The property is not adjacent to Hwy #1
4.7	Adjacent to Hwy #1, where no vegetation exists of, vegetation that is permitted to be altered, is replaced by a combination of landscaping and berming	N/A	The property is not adjacent to Hwy #1
4.8	Outside storage areas are screened. Screening along Hwy #1 does not compromise the visibility of the building(s) on site	N/A	No outside storage is proposed.
5.	Lighting		
5.1	Adequate lighting of all pedestrian and vehicle movement areas to ensure security and public safety	No	A recommended condition requires that a lighting plan be submitted prior to the issuance of a Building Permit to ensure adequate lighting is provided for the building and parking area.
6.	Crime Prevention Through Environmental Design (CPTED)		
6.1	Application of CPTED principals for building design, lighting, signage, etc	Yes	As outlined in the attached CPTED Assessment, prepared by <i>AMR Systems</i> , the proposal incorporates key CPTED principles into the design
7.	Public Open Space and Recreational Pathways		
7.1	Open space areas should be designed for passive and active recreational opportunities for employees	Yes	Although open/left-over space is limited, an outdoor employee amenity area has been provided at the rear of the industrial site
7.2	Outside employee amenity area provided (an encouragement)	Yes	An outdoor employee amenity area complete with a picnic table, landscaping and nearby bicycle parking has been included.
7.3	Secure bicycle storage provided (an encouragement)	Yes	Bicycle parking has been provided in accordance with the Zoning Bylaw
8.	Outdoor Storage		
8.1	Outdoor storage areas should be located at the rear or side of the building and visually buffered	N/A	No outdoor storage is proposed
9.	Signage		
9.1	Signage is architecturally coordinated with the overall design of the building and landscaping	Yes	A Sign Permit is required for new signage as per the Sign Bylaw.
9.2	Complies with the Sign Bylaw	No	A variance to increase the copy area of a free-standing sign from 20m ² to 27m ² has been included within the concurrent Development Variance Permit application

9. SOURCES OF INFORMATION:

- Rezoning Application (RZ001662) – August 8, 2022
- Development Permit Application (DP001712) – May 12, 2023
- Development Variance Permit Application (DVP01343) – February 9, 2023
- Development Application Review Team (DART) Minutes – October 13, 2022 & June 29, 2023
- CPTED Report, prepared by *AMR Systems* – August 30, 2023

Location MapOrtho Photo