



Memorandum

Date: February 28, 2008

To: SOUTHERN NEVADA DISTRICT BOARD OF HEALTH

From: Paul Klouse, R.E.H.S., C.F.S.P., *Environmental Health Supervisor*
Randy Swepston, R.E.H.S., *Environmental Health Manager*
Glenn D. Savage, *Director of Environmental Health*
Lawrence K. Sands, M.D., M.P.H., *Chief Health Officer*

Petitioner: Bruce A. Aguilera, Vice President & General Counsel, Project CC LLC, dba CITYCENTER, for Lifestyles Hotel, MGM CITYCENTER

Subject: Variance Request to Operate a Public Bathing Place not in Compliance with the *Nevada Administrative Code (NAC) 444, Public Bathing Places, NAC444.130.1 & NAC444.134.1; (APN #162-20-701-021)*

Project CC LLC, dba CITYCENTER, is petitioning for a variance as requested by Bruce Aguilera, to operate three public bathing places at Lifestyles Hotel, pending permit numbers 27600-3HT-03, 04, & 05, not in compliance with the *Nevada Administrative Code (NAC) 444, Public bathing Places, section 130, paragraph 1, and section 134, paragraph 1* (see attached letter to Glenn Savage, Director of Environmental Health, dated 01-21-08) which state:

NAC 444.130 Handholds. (NRS 439.200, 444.070)

1. Every pool must be provided with a handhold around the entire perimeter of the pool, such as a perimeter overflow system, bull-nosed coping or cantilevered decking, installed not more than 9 inches (22.86 centimeters) above the waterline.

NAC 444.134 Decks. (NRS 439.200, 444.070)

1. Except as otherwise provided in this subsection and in NAC 444.196 and 444.1995, a clear, unobstructed deck must be provided around the entire perimeter of a pool. In no case may the width of the deck be less than 4 feet (1.2 meters). A deck may be obstructed for a distance equal to not more than 10 percent of the perimeter of the pool if:

(a) The design of the obstruction does not endanger the health or safety of persons using the pool;

(b) An unobstructed area of deck not less than 4 feet wide is provided around or through the obstruction not more than 15 feet (4.55 meters) from the edge of the pool; and

(c) Written approval for the obstruction is obtained from the health authority before construction or installation of the obstruction.

October 25, 2007

The three pools are to be built as part of the *Lifestyles Hotel*, an Project CC / MGM CITYCENTER project (see exhibit 'A'), located on APN #162-20-701-021 (see exhibit "B"), 3716 S. Las Vegas Blvd.(see exhibit "C"). This hotel will combine both resort public accommodation and condominium units.

DISCUSSION

This variance request is made to allow the Petitioner to construct and operate a public bathing place pool which is not in compliance with *Nevada Administrative Code (NAC) 444, Public bathing Places, section 130, paragraph 1, and section 134, paragraph 1*, which require an uninterrupted handhold around the full perimeter of a swimming pool and which requires the deck around a pool to be no more than 10% obstructed in total.

The Petitioner proposes to construct three consecutive bodies of water at the *Lifestyles Hotel*, two of which (Upper & Middle) provide no qualified handhold along the infinity edge of the each pool, and all three of which provide no access or egress from the pool along more than 10% of the pool perimeter (see exhibit "D").

The Petitioner states "...the three pools - Upper, Middle and Lower- (See attachments), proportioned as and intended to be primarily used as "pool" experiences, have less than 100% of 4' wide perimeter deck, specifically 67%; 81 % and 84%, at or no more than 9" above the water surface. On the east side only of the Upper and Middle basins, the section of surrounding, impervious, walking surface is 2" below the operating water level, necessitated by the elevation changes across the recreational deck space... A variance is requested from subsection 444.134.1 of NAC, which states in part - "a clear, unobstructed deck must be provided around the entire perimeter of a pool."

" The Petitioner continues "...the negative edge portion of the Upper and Middle Pools does not constitute a handhold. A variance is requested from subsection 444.130.1 of NAC, which states in part - "Every pool must be provided with a handhold around the entire perimeter of the pool."

Regarding the uniqueness & general affect requirements of NAC 439.240, the Petitioner argues that "...the stepped pool deck is amongst the most prominent and important amenities of this multi-billion dollar project. The elevation change across the deck necessitated separation of an otherwise single large water body into three smaller, tiered basins at 2 ft. elevation differences to resolve structural issues. To date, the Owner has successfully marketed its condominium hotel sales with these stepped, negative edge water bodies..."

Regarding the regulatory burden, hardship and property right requirements of NAC 439.240, the Petitioner argues that "...Compliance with the current regulation would be burdensome and cause a hardship to the Lifestyle Hotel's business in the increasingly competitive Las Vegas resort market. The water bodies' stepped configuration resolved structural considerations, provided a more functional deck space and offered a significant aesthetic enhancement from the basins, which play an important, project signature role. These type of pools have proven to be very popular features with guests; their visual presentation and associated sound augmenting the overall ambience and relaxation value of the pool environment. Project marketing will be severely impaired without this critical identity element. The hardships incurred by compliance with the regulation would be lessened project

visibility, reduced property occupancy, significantly increased operating costs and decreased revenues, not only for the Owner and Operator, but also the State and County..."

The Petitioner concludes "...Granting the variance will not be detrimental or pose a danger to public health and safety, nor will it affect other persons subject to regulations regarding water recirculation requirements..." The petitioner then goes on to state a number of design features and conditions that have been agreed upon that may serve to mitigate risk regarding the absence of the handholds and the deck obstructions as previously described:

"1. ...All three pools are a constant 21 '5" only in width, none is deeper than 4 ft. at any point and all will be recirculated at a turnover rate of less than six (6) hours.

2. Two elevated, portable Lifeguard stands; minimum three (3) feet in height, are proposed as an added safety measure to address the stepped deck and negative edge condition. A lifeguard will be stationed on the pool deck until the deck occupancy reaches seventy five (75); a population beyond which a second lifeguard would be posted. One lifeguard is proposed in a chair and one roaming during lighter usage; both would be stationed in chairs during heavy occupancy.

3. Surveillance cameras on the pool entry doors will be provided, with alarms to alert security, if an individual enters the pool area after it has closed.

4. Standard signage including "No solo bathers" and "No-one under the age of 14 allowed without adult supervision" will be posted.

5. Equipment and trained staff will be provided to allow for the cleaning of the pools around the deck obstructions."

Section 439.240 of the Nevada Administrative Code (NAC) states that a variance can be granted from a regulation only if it is found, from evidence presented at a hearing that:

"(a) There are circumstances or conditions which:

1. Are unique to the applicant;
2. Do not generally affect other persons subject to the regulations;
3. Make compliance with the regulation unduly burdensome; and
4. Cause a hardship to and abridge a substantial property right of the applicant; and

(b) Granting the Variance:

1. Is necessary to render substantial justice to the applicant and enable him to preserve and enjoy his property right; and
 2. Will not be detrimental or pose a danger to public health and safety.
2. Whenever an applicant for a Variance alleges that he suffers or will suffer economic hardship by complying with the regulation, he must submit evidence demonstrating the costs of this compliance with the regulation. The Board will consider the evidence and determine whether those costs are unreasonable."

CONCLUSION:

Staff is of the opinion that there exist circumstances which satisfy the requirements for a variance and that the granting of this variance will not be detrimental or pose a danger to public health and safety if the following conditions as recommended are included.

RECOMMENDATIONS:

Therefore, staff recommends approval of the variance with the following conditions:

1. Lifeguards will be required at this facility and will be subject to the regulations as provided in NAC 444.132, 272, 274, 276, 302.
2. Two elevated, portable Lifeguard stands will be required to mitigate the additional risk posed by the stepped deck and negative edge condition.
3. A single lifeguard will be stationed on the pool deck until the deck occupancy reaches seventy five (75); a population beyond which a second lifeguard must be posted.
4. One lifeguard in an elevated chair and one roaming on the opposite side of the pool will be allowed during lighter usage, 75-150 persons on the pool deck; both guards will be stationed in elevated chairs during occupancy over 150 persons.
5. The chairs must be located to provide a clear, unobstructed view of the bottom of the pool in the area of surveillance.
6. Surveillance cameras on the pool entry doors must be provided, along with alarms to immediately alert security if a person or persons enter the pool area after it has closed.
7. A security guard must be dispatched to investigate the accessing of the pool deck after hours, and must be able to reach the pool deck within 3 minutes of receiving the alarm. The security guard must remain on the pool deck and assure that all rules posted are followed; the guard must remain on the pool deck until the deck is unoccupied.
8. Specific equipment and training of staff must be provided to allow for adequate cleaning of the pools around the deck obstructions.
9. This public bathing facility must be designed, constructed, maintained, and operated with all other applicable requirements of the *Public Bathing Place regulations, NAC 444.010-546*.
10. This variance is automatically terminated without further notice upon the closing of any sale transaction involving the public bathing facility.

PK:RS:GS

Attachments:

Letter to Glenn Savage dated January 21, 2008

EXHIBIT "A" Secretary of State page for Project CC LLC & CITYCENTER HOLDINGS LLC

EXHIBIT "B" Assessor's Real Property record & Map for APN #162-20-701-021

EXHIBIT "C" GIS aerial photo of APN #162-20-701-021

EXHIBIT "D" Design drawings provided

Letter to Glenn Savage dated January 21, 2008

Variance Request – Project CC, dba CITYCENTER, Lifestyles Hotel

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February 28th, 2008

Letter to Glenn Savage dated January 21, 2008



JAN 22 2008

BRUCE A. GUILERA
City Engineer and General Counsel

January 21, 2008

Mr. Glenn D. Savage, Environmental Health Division Director
Southern Nevada Health District
Environmental Health Division - Pool Plan Desk
625 Shadow Lane
Las Vegas, NV 89127

**Subject: LIFESTYLE HOTEL, MGM CITYCENTER, Las Vegas, NV-
Request for Variances from NAC 444.134.1 for entire Pool Perimeter
Decks and NAC 444.130.1 for entire Pool Perimeter Handrails**

Dear Mr. Savage:

Please accept this letter, in connection with the submittal of the Pool Deck engineered pool system plans by STO Design Group, Inc., as the request of the Owner, Project CC, LLC, d/b/a CITYCENTER, for a variance from NAC 444.134.1 regarding the three pools on the outdoor Pool Deck at The Lifestyle Hotel, to accommodate less than their entire perimeters having four feet minimum width decks and NAC 444.130.1 being provided with a handhold.

Please note the current business address of the Owner is shown as the Corporate address as set forth below. The address of the establishment is 3716 Las Vegas Boulevard South, Las Vegas, Nevada 89109; the Assessor's Parcel Number is 162-20-201-021. The main phone number for the Owner and Operator and, for the present, the establishment is (702) 590-8855, although you can reach the undersigned through our legal department at (702) 693-7206, which is the number listed on the Variance Candidate Worksheet.

The location of the Pool Deck, which is one of The Lifestyle Hotel project's signature amenities, is on the rooftop of the building between elevations 2181' and 2185'.

More specifically, the specific variance issues are as follows:

1. That the three pools – Upper, Middle and Lower – (See attachments), proportioned as and intended to be primarily used as "pool" experiences, have less than 100% of 4' wide perimeter deck, specifically 67%, 81% and 84%, at or no more than 9" above the water surface. On the east side only of the Upper and Middle basins, the section of surrounding, impervious, walking surface is 2' below

February 28th, 2008

Mr. Glenn D. Savage

January 21, 2008

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2. Two elevated, portable lifeguard stands; minimum three (3) feet in height, are proposed as an added safety measure to address the stepped deck and negative edge condition. A lifeguard will be stationed on the pool deck until the deck occupancy reaches seventy five (75); a population beyond which a second lifeguard would be posted. One lifeguard is proposed in a chair and one roaming during lighter usage; both would be stationed in chairs during heavy occupancy.
3. Surveillance cameras on the pool entry doors will be provided, with alarms to alert security, if an individual enters the pool area after it has closed.
4. Standard signage including "No solo bathers" and "No-one under the age of 14 allowed without adult supervision" will be posted.
5. Equipment and trained staff will be provided to allow for the cleaning of the pools around the deck obstructions.

Please contact me if you require any further information for your consideration of this variance request.

Sincerely


Bruce A. Aguilera
Vice President and General Counsel

cc: Paul Klouse, SNHD
Bill Ham, MGM Mirage
Bill Bradley, AAI
Jessica Huennekens, MGM Mirage
Desmond Stevens, STO Design Group

PROJECT CC, LLC

Business Entity Information			
Status:	Active	File Date:	1/18/2005
Type:	Domestic Limited-Liability Company	Corp Number:	LLC952-2005
Qualifying State:	NV	List of Officers Due:	1/31/2009
Managed By:	Managers	Expiration Date:	1/18/2505

Resident Agent Information			
Name:	BRYAN L WRIGHT	Address 1:	3950 LAS VEGAS BLVD SOUTH
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89119
Phone:		Fax:	
Email:		Mailing Address 1:	
Mailing Address 2:		Mailing City:	
Mailing State:		Mailing Zip Code:	

Financial Information			
No. Par Share Count:	0	Capital Amount:	\$ 0
No stock records found for this company			

Officers				Include Inactive Officers
Manager - GARY N JACOBS				
Address 1:	3600 LAS VEGAS BLVD S	Address 2:		
City:	LAS VEGAS	State:	NV	
Zip Code:	89109	Country:		
Status:	Active	Email:		
Manager - J TERENCE LANNI				
Address 1:	3600 LAS VEGAS BLVD S	Address 2:		
City:	LAS VEGAS	State:	NV	
Zip Code:	89109	Country:		
Status:	Active	Email:		
Manager - JAMES J MURREN				
Address 1:	3600 LAS VEGAS BLVD S	Address 2:		
City:	LAS VEGAS	State:	NV	
Zip Code:	89109	Country:		
Status:	Active	Email:		

ANNUAL LIST OF MANAGERS OR MANAGING MEMBERS AND RESIDENT AGENT OF

PROJECT CC, LLC
FOR THE PERIOD JAN 2008 TO 2009. DUE BY JAN 31, 2008.



LLC982-2006

The Limited-Liability Company's duly appointed resident agent in the State of Nevada upon whom process can be served is:

BRYAN L WRIGHT
3950 LAS VEGAS BLVD SOUTH
LAS VEGAS NV 89119

Filed in the office of Ross Miller Secretary of State State of Nevada	Document Number 20070864307-67
	Filing Date and Time 12/19/2007 1:41 PM
	Entity Number LLC952-2006

**** PLEASE NOTE: YOU MAY NOW FILE YOUR ANNUAL LIST ONLINE AT WWW.SECRETARYOFSTATE.BIZ ****

IF THE ABOVE INFORMATION IS INCOMPLETE, PLEASE CHECK THIS BOX AND A CHANGE OF RESIDENT AGENT ADDRESS FORM WILL BE SENT.

THE ABOVE SPACE IS FOR OFFICE USE ONLY

PLEASE READ INSTRUCTIONS BEFORE COMPLETING AND RETURNING THIS FORM.

1. Include the names and addresses, exact addresses or business, for all managers, or if none, its managing members. Last year's information has been preprinted. If you need to make changes, cross out the incorrect information and insert the new information above it. A manager, or if none, a managing member of the company must sign the form. FORMS WILL BE RETURNED IF UNMAILED.
2. If there are additional managers or managing members, attach a list of them to this form.
3. Return the completed form with the \$125.00 filing fee. A \$75.00 penalty could be added for late fee to file this form by the deadline. An annual list received more than 90 days before its due date shall be deemed an amended list for the previous year.
4. Have your check payable to the Secretary of State. To receive a certified copy, enclose an additional \$30.00 and appropriate instructions.
5. Return the completed form to: Secretary of State, 302 N. Carson St., Carson City, NV 89701-4201. (775) 684-5700.
6. Form must be in the possession of the Secretary of State on or before the last day of the month in which it is due. (Postmark date is not accepted as receipt date.) Forms received after due date will be returned by mail at a fee and penalty.

FILING FEE: \$125.00 PENALTY: \$75.00

NAME GARY N JACOBS	TITLE(S)	(Document will be rejected if this not indicated) (Mark one)		
		<input checked="" type="checkbox"/> MANAGER	<input type="checkbox"/> MANAGING MEMBER	
P.O. BOX 3600 LAS VEGAS BLVD S	CITY LAS VEGAS	ST. NV	ZIP 89109	
NAME J TERRENCE LAMMI	TITLE(S)	(Document will be rejected if this not indicated) (Mark one)		
		<input checked="" type="checkbox"/> MANAGER	<input type="checkbox"/> MANAGING MEMBER	
P.O. BOX 3600 LAS VEGAS BLVD S	CITY LAS VEGAS	ST. NV	ZIP 89109	
NAME JAMES J MURREN	TITLE(S)	(Document will be rejected if this not indicated) (Mark one)		
		<input checked="" type="checkbox"/> MANAGER	<input type="checkbox"/> MANAGING MEMBER	
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NAME	TITLE(S)	(Document will be rejected if this not indicated) (Mark one)		
		<input type="checkbox"/> MANAGER	<input type="checkbox"/> MANAGING MEMBER	
P.O. BOX	CITY	ST.	ZIP	

I declare, to the best of my knowledge under penalty of perjury, that the above mentioned entity has complied with the provisions of NRS 93A.070 and acknowledge that pursuant to NRS 93A.070, it is a category 0 entity or knowingly after any false or misleading information is filing in the Office of the Secretary of State.

X Signature of Manager or Managing Member

Date

SECRET (507 471)

**ADDENDUM TO ANNUAL LIST OF MANAGERS OR MANAGING MEMBERS OF
PROJECT CC, LLC**

Robert H. Baldwin, President and CEO

Chris Nordling, Executive Vice President and CFO

John McManus, Vice President and General Counsel

Cathy J. Santoro, Treasurer

Gary N. Jacobs, Secretary

Bruce Aguilera, Assistant Secretary

Bryan L. Wright, Assistant Secretary

Entity Details - Secretary of State, Nevada

CITYCENTER HOLDINGS, LLC

Business Entity Information			
Status:	Active	File Date:	11/7/2007 4:45:16 PM
Type:	Foreign Limited-Liability Company	Corp Number:	E0769162007-7
Qualifying State:	DE	Last of Officers Due:	11/30/2008
Managed By:		Expiration Date:	

Resident Agent Information			
Name:	BRYAN L WRIGHT	Address 1:	3950 LAS VEGAS BLVD SOUTH
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89119
Phone:		Fax:	
Email:		Mailing Address 1:	
Mailing Address 2:		Mailing City:	
Mailing State:		Mailing Zip Code:	

Financial Information			
No. Par Share Count:	0	Capital Amount:	\$ 0
No stock records found for this company.			

Officers				Include Inactive Officers
Manager - PROJECT CC LLC				
Address 1:	3600 LAS VEGAS BLVD SOUTH	Address 2:		
City:	LAS VEGAS	State:	NV	
Zip Code:	89109	Country:		
Status:	Active	Email:		

Actions/Amendments			

Variance Request – Project CC, dba CITYCENTER, Lifestyles Hotel

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EXHIBIT "B" Assessor's Real Property Record & Map for APN #162-20-701-021

Clark County Real Property

Parcel No.	162-20-701-021
Owner and Mailing Address	RESTAURANT VENTURES NEVADA INC %MGM MIRAGE CORP FIN 86R SELWOOD 3950 LAS VEGAS BLVD S LAS VEGAS NV 89119-1005
Location Address City/Unincorporated Town	3720 S LAS VEGAS BLVD PARADISE
Assessor Description	PT NE4 SE4 SEC 20 21 61
Recorded Document No.	* 19971205100165
Recorded Date	12/05/1997
Viewing Status	NO STATUS

*Note: Only documents from September 15, 1999 through present are available for viewing.

Use District	470
Assessed Year	2007
Fiscal Year	07-08
Supplemental Improvement Value	12735920
Supplemental Improvement Account Number	N/A

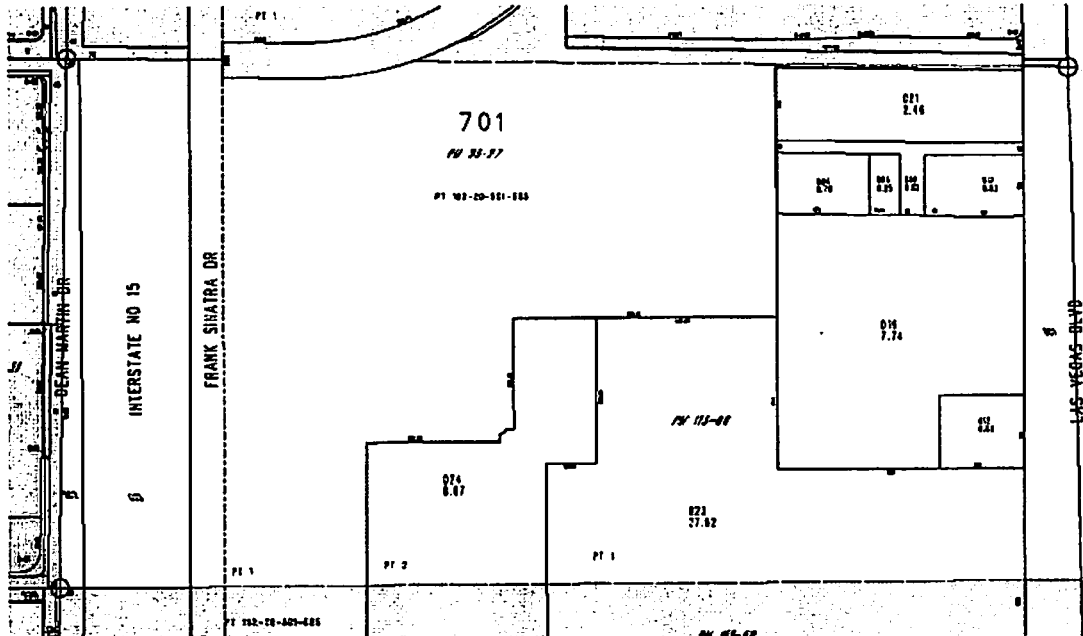
Fiscal Year	2007-08	2008-09
Land	14942111	16577343
Improvements	0	12944881
Personal Property	0	0
Exempt	0	0
Gross Assessed	14942111	29122224
Netable Value Land + Imp	42691746	83206354
Estimated Size	2.46 Acres	
Original Construct Year	2007	
Last Sale Price Monthly/Year	0	
Land Use	RESIDENTIAL APARTMENTS	
Dwelling Units	1	

Variance Request – Project CC, dba CITYCENTER, Lifestyles Hotel

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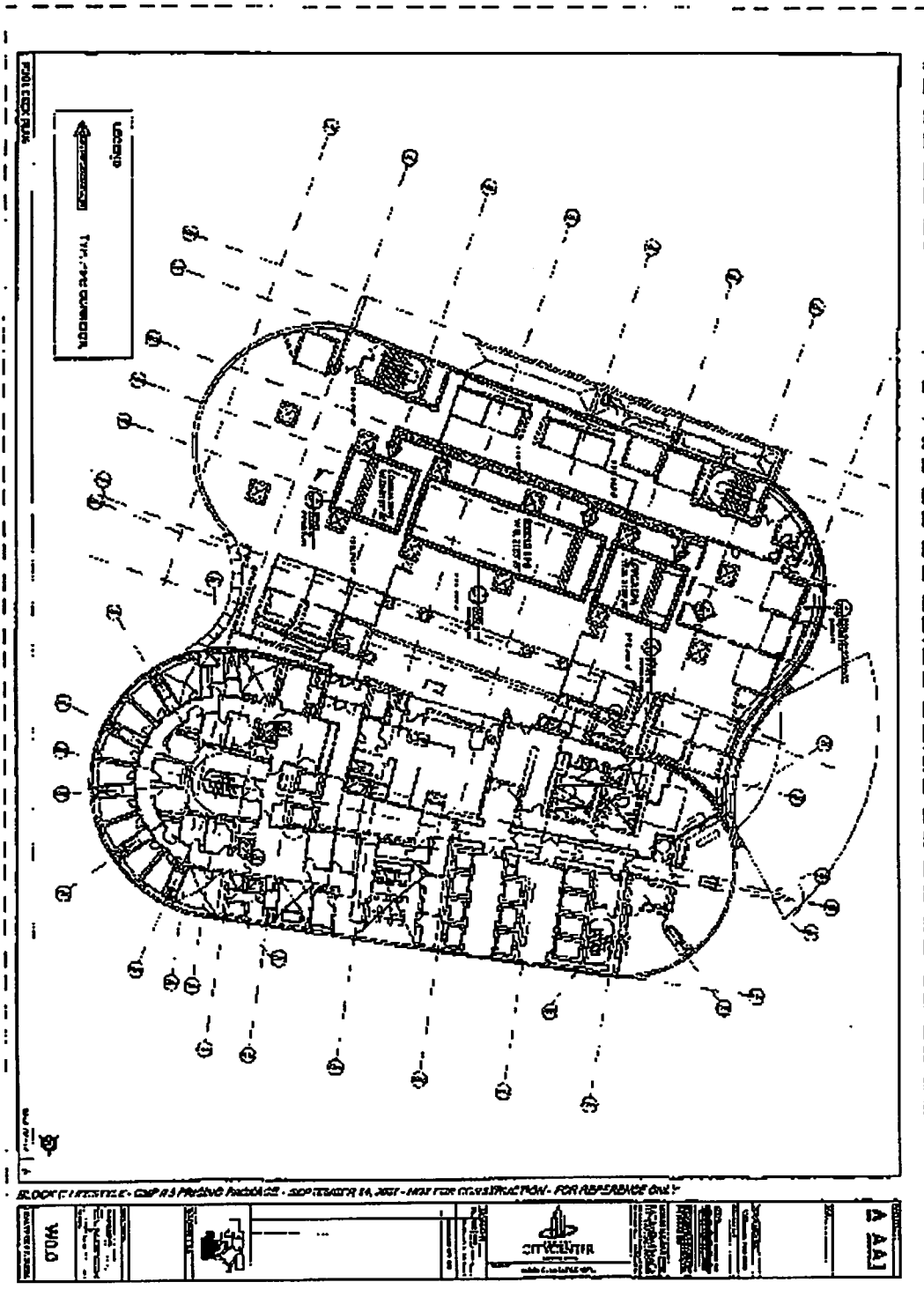
<p>NOTES</p> <p>This map is for assessment use only and does not represent a survey. Its liability is limited to the accuracy of the data submitted thereto. Structures on rivers and other non-assessed parcels may be omitted from the final document being in the Assessor's Office.</p> <p>This map is compiled from official records, including surveys and deeds, but only contains the information supplied for assessment. See the recorded documents for more detailed legal information.</p> <p>NO FIELD SURVEYS WILL BE CONDUCTED FOR THIS PURPOSE.</p>	<p>MAP LEGEND</p> <p>Parcel Boundary 0.11</p> <p>Sub Boundary 202</p> <p>Field Enclosure 10-10</p> <p>Paired Boundary 5</p> <p>Common Parcel Lot Line 6</p> <p>Section Line / Leader Line 6.5</p> <p>Head to Backer 6.5</p>	<p>ASSESSOR'S PARCELS - CLARK CO., NV.</p> <p>M. W. Schofield, Assessor</p>		<p>T21S R61E</p>	<p>20</p>	<p>N 2 SE 4</p>	<p>162-20-7</p>																																																																																																
		<p>Parcel Marker</p> <p>Lease Line</p> <p>Parcel Surveyed Marker</p> <p>Play Recorders Marker</p> <p>Block Marker</p> <p>Lot Marker</p> <p>Conv. Lot Marker</p>	<table border="1"> <tr><td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>7</td><td>8</td><td>9</td><td>10</td></tr> <tr><td>11</td><td>12</td><td>13</td><td>14</td><td>15</td><td>16</td><td>17</td><td>18</td><td>19</td><td>20</td></tr> <tr><td>21</td><td>22</td><td>23</td><td>24</td><td>25</td><td>26</td><td>27</td><td>28</td><td>29</td><td>30</td></tr> <tr><td>31</td><td>32</td><td>33</td><td>34</td><td>35</td><td>36</td><td>37</td><td>38</td><td>39</td><td>40</td></tr> <tr><td>41</td><td>42</td><td>43</td><td>44</td><td>45</td><td>46</td><td>47</td><td>48</td><td>49</td><td>50</td></tr> </table>	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	<table border="1"> <tr><td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>7</td><td>8</td><td>9</td><td>10</td></tr> <tr><td>11</td><td>12</td><td>13</td><td>14</td><td>15</td><td>16</td><td>17</td><td>18</td><td>19</td><td>20</td></tr> <tr><td>21</td><td>22</td><td>23</td><td>24</td><td>25</td><td>26</td><td>27</td><td>28</td><td>29</td><td>30</td></tr> <tr><td>31</td><td>32</td><td>33</td><td>34</td><td>35</td><td>36</td><td>37</td><td>38</td><td>39</td><td>40</td></tr> <tr><td>41</td><td>42</td><td>43</td><td>44</td><td>45</td><td>46</td><td>47</td><td>48</td><td>49</td><td>50</td></tr> </table>	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49
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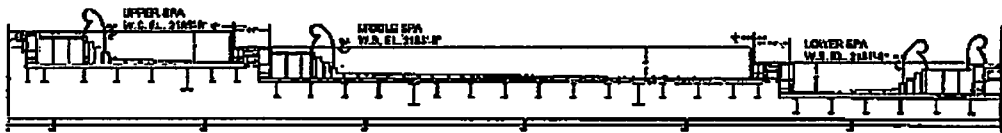


TAX DIST 470

EXHIBIT "C" GIS aerial photo of APN #162-20-701-021







LIFESTYLE HOTEL - POOL DECK LONGITUDINAL SECTION 8/20/07



