



Memorandum

Date: January 24, 2013

To: SOUTHERN NEVADA DISTRICT BOARD OF HEALTH

From: Candice Stirling, *Environmental Health Specialist II* *CS*
Susan LaBay, *Environmental Health Supervisor* *SL*
Glenn D. Savage, *Director of Environmental Health* *GS*
John Middaugh, M.D., *Interim Chief Health Officer* *JM*

Petitioner: Corner Investment Company, LLC d/b/a Bill's Gamblin' Hall & Saloon, 3595 Las Vegas Blvd South, Las Vegas, NV, 89109
For Health Permit: SR0011912
Lee Monfort, for the Owner(s), Bill's Gamblin' Hall & Saloon

Subject: Variance Request to Operate a Public Bathing Places not in Compliance with the Nevada Administrative Code (NAC) 444.134.1 and NAC 444.454.1 (APN# 162-21-101-001)

I. BACKGROUND:

Corner Investment Company, LLC d/b/a Bill's Gamblin' Hall is petitioning for a variance as requested by Michael D. Cohen, Secretary of Casears Entertainment Operating Company, Inc, the managing member of Corner Investment Company, (see Attachment A "Nevada Secretary of State Corporate Information"), represented by Lee Monfort, (see Attachment B "Variance Application Letter"), to operate three public bathing places not in compliance with Nevada Administrative Code (NAC) 444.134.1, which states in part - "... a clear, unobstructed deck must be provided around the entire perimeter of a pool..."; and NAC 444.454.1, which states in part - "... a continuous unobstructed deck at least 4 feet... wide... must be provided around at least half of the perimeter of the spa....". The public bathing places will be located on Assessor's Parcel Number (APN) #162-21-101-001 (see Attachment C "Assessor's Parcel Information" and Attachment D "Assessor's Map"), at 3595 Las Vegas Blvd South, Las Vegas, NV, 89109.

II. RECOMMENDATION:

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 an unreasonable danger to public health and safety if the following conditions as recommended are included:

1. The petitioner agrees to maintain walkway area around accessible and free from obstruction;
2. The petitioner agrees to adhere to all other applicable requirements of the Public Bathing Places Public Spas Regulations, NAC 444;
3. Failure of the petitioner to prevent public health and safety issues, as determined by the health authority, will result in the voiding of this variance;
4. This variance is automatically terminated without further notice upon the closing of any sale transaction involving the subject property, or upon petitioner leasing or assigning operation of these public bathing spas to any other person or entity.

III. CONDITIONS:

The petitioner requests a variance "...to grant a condition that two pools be constructed with a 12" wide edge 14" above the deck and one spa be constructed with a 12" wide edge 18" above the deck. This is requested because the necessary building structural trusses spanning the horizontal distances on the 10th floor preclude being able to recess the pool flush with the deck to accommodate all the project elements. On the 11th floor, the available floor to ceiling dimension does not accommodate the spa being recessed to deck elevation."

The petitioner states "... Per the plans reviewed and discussed at a November 28, 2012 Variance Meeting at the Southern Nevada Health District, the two 10th floor pools' water depth varies from 9" to 3'-6", and on the 11th floor the small infinity edge spa's proposed water depth is 3'-0". In each instance the edge of the water bodies is surrounded by minimum 4'-0" wide decks, fully compliant with the requirements of NAC 444.134 and NAC 444.454. However, on the 10th floor, necessary structural trusses spanning a North-South orientation preclude depressing the water bodies to the elevation where the pool coping would coincide with the deck. This structural configuration, intrinsic to the design of the building, causes a discrepancy between the pools' coping elevation and that of the adjacent deck. This can be readily and pragmatically resolved by raising the pool edges 14" above the elevation of the unobstructed, perimeter deck. On the 11th floor, an infinity edge spa would intrusively encroach into the available 8' vertical headroom of the space beneath, unless its edge is similarly raised 18" above the surrounding deck."

The petitioner states "... For each water body, unhindered access to the entire water body will be maintained from the surrounding deck. Furthermore, stair entries compliant with the requirements of NAC 444.128 will be provided to enter the water bodies. Guests will also be able to enter the pools and spa by sitting on the edge and rotating their bodies. The raised edge will not create a tripping hazard as warning tiles will be installed on both the interior and exterior of the pools and spa. Also, consistent with typical pool design and the requirements of NAC 444.134.3 and NAC 444.454.9, a positive slope away from the raised edge of the water bodies and towards area deck drains will be provided to remove any water that splashes out

from the pools and spa. The proposed 14" raised edge also mirrors the condition of the existing "Dish Pool" at The Hard Rock Hotel in Las Vegas, which has operated problem free."

The petitioner states "...The evidence presented for granting a variance to permit Bill's Gamblin' Hall & Saloon to deviate from NAC regulation 444.134.1, i.e. accommodating a pool with a perimeter edge raised 14" above the surrounding deck, and NAC 444.454.1 accommodating a spa with a perimeter edge raised 18" above the surrounding deck, is listed below:

(a) There are circumstances or conditions which -

(1) Are unique to the applicant:

A unique condition exists at the project, i.e. the building's primary structural members include substantial steel trusses, intrinsic to the design, that preclude viably being able to tie the coping elevation of the new water bodies flush with the surrounding deck elevation. The matter is resolved by raising the pool edges 14" and the spa edge 18".

(2) Do not generally affect other persons subject to regulations:

Granting a variance will not affect other persons subject to regulations regarding pool or spa decks. The design of the water bodies will comply in all respects with the requirements of Nevada Administrative Code, Chapter 444 other than for the subsections cited.

(3) Make compliance with the regulation unduly burdensome:

Compliance with the current regulation would be unduly burdensome for Bill's Gamblin' Hall & Saloon. The building's structural steel would need to be reconfigured, which would necessitate extensive additional columns and slabs, temporary property closure, very extensive demolition and reconstruction, all at an exorbitant cost.

(4) Hardships caused and substantial property right abridged by complying with the regulation include:

(i) An extremely costly reconfiguration of the building's proposed structural steel design to eliminate the trusses which create the required spans would be required, as well as a temporary property closure to complete the reconfiguration. The estimated additional cost of a reconfigured structural system is \$1,275,000 and the estimated loss of revenue during the closure is \$850,000.

(ii) Without being granted a variance to install the raised edge pools, the project would be deprived of important, high profile amenities. As well as being swimmable bodies of water, the pools afford iconic, signature marketing value to the use and operation of this rooftop space, in conjunction with a nightclub. Without these, the property will suffer impaired visibility, reduced property occupancy and decreased revenues. That opportunity cost is estimated to be at least \$850,000 per annum."

(b) Granting the Variance -

(1) Is necessary to render substantial justice to the applicant and enable their preserving and enjoying a property right:

Granting the variance will allow the use of the deck for swimming and to provide amenities offering high aesthetic value and aquatic ambience, in conjunction with the operation of a nightclub; a right currently enjoyed by other nearby properties.

(2) Will not be detrimental or pose a danger to public health and safety:

Granting the variance will not be detrimental or pose a danger to public health and safety, because the pools and spa will be engineered to incorporate all necessary and code mandated safety provisions, as well as additional warning tiles and markings to delineate the raised pool edge condition.

CS

Attachments:

- A. Nevada Secretary of State Corporate Information
- B. Variance Application Letter
- C. Assessor's Parcel Information
- D. Assessor's Map
- E. Affidavit of Public Notice
- F. Proposed Construction Site Plans
- G. Proposed Construction Pool Plan
- H. Proposed Construction Spa Plan

Attachment A: Nevada Secretary of State Corporate Information

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 My Data Reports Commercial Recordings Licensing

CORNER INVESTMENT PROPCO, LLC

New Search		Printer Friendly		Calculate List Fees	
Business Entity Information					
Status:	Active	File Date:	7/17/2012		
Type:	Foreign Limited-Liability Company	Entity Number:	E0377752012-1		
Qualifying State:	DE	List of Officers Due:	7/31/2013		
Managed By:		Expiration Date:			
NV Business ID:	NV20121443398	Business License Exp:	7/31/2013		

Registered Agent Information					
Name:	CSC SERVICES OF NEVADA, INC.	Address 1:	2215-B RENAISSANCE DR		
Address 2:		City:	LAS VEGAS		
State:	NV	Zip Code:	89119		
Phone:		Fax:			
Mailing Address 1:		Mailing Address 2:			
Mailing City:		Mailing State:	NV		
Mailing Zip Code:					
Agent Type:	Commercial Registered Agent - Corporation				
Jurisdiction:	NEVADA	Status:	Active		
View all business entities under this registered agent					

Officers						<input type="checkbox"/> Include Inactive Officers
Managing Member - CORNER INVESTMENT HOLDINGS LLC						
Address 1:	ONE CAESARS PALACE DRIVE		Address 2:			
City:	LAS VEGAS		State:	NV		
Zip Code:	89109		Country:	USA		
Status:	Active		Email:			

Actions/Amendments
[Click here to view 3 actions/amendments associated with this company](#)

Search ..

CORNER INVESTMENT HOLDINGS, LLC

New Search	Printer Friendly	Calculate List Fees
Business Entity Information		
Status:	Active	File Date:
Type:	Foreign Limited-Liability Company	Entity Number:
Qualifying State:	DE	List of Officers Due:
Managed By:		Expiration Date:
NV Business ID:	NV20121443379	Business License Exp:
		7/31/2013

Registered Agent Information		
Name:	CSC SERVICES OF NEVADA, INC.	Address 1:
Address 2:		City:
State:	NV	Zip Code:
Phone:		Fax:
Mailing Address 1:		Mailing Address 2:
Mailing City:		Mailing State:
Mailing Zip Code:		
Agent Type:	Commercial Registered Agent - Corporation	
Jurisdiction:	NEVADA	Status:
		Active

[View all business entities under this registered agent](#)

Officers		<input type="checkbox"/> Include Inactive Officers
Managing Member - CORNER INVESTMENT COMPANY LLC		
Address 1:	ONE CAESARS PALACE DRIVE	Address 2:
City:	LAS VEAGS	State:
Zip Code:	89109	Country:
Status:	Activo	Email:

Actions/Amendments
[Click here to view 2 actions/amendments associated with this company](#)

Search . .

CORNER INVESTMENT COMPANY, LLC

New Search		Printer Friendly		Calculate List Fees	
Business Entity Information					
Status:	Active	File Date:	11/3/2006		
Type:	Domestic Limited-Liability Company	Entity Number:	E0806412006-3		
Qualifying State:	NV	List of Officers Due:	11/30/2013		
Managed By:	Managers	Expiration Date:			
NV Business ID:	NV20061388662	Business License Exp:	11/30/2013		

Registered Agent Information					
Name:	CSC SERVICES OF NEVADA, INC.	Address 1:	2215-B RENAISSANCE DR		
Address 2:		City:	LAS VEGAS		
State:	NV	Zip Code:	89119		
Phone:		Fax:			
Mailing Address 1:		Mailing Address 2:			
Mailing City:		Mailing State:	NV		
Mailing Zip Code:					
Agent Type:	Commercial Registered Agent - Corporation				
Jurisdiction:	NEVADA	Status:	Active		
View all business entities under this registered agent					

Officers						<input type="checkbox"/> Include Inactive Officers
Managing Member - CAESARS ENTERTAINMENT OPERATING COMPANY INC						
Address 1:	ONE CAESARS PLACE DRIVE	Address 2:				
City:	LAS VEGAS	State:	NV			
Zip Code:	89109	Country:				
Status:	Active	Email:				

Actions/Amendments
[Click here to view 14 actions/amendments associated with this company](#)

Search...

CAESARS ENTERTAINMENT OPERATING COMPANY, INC.

New Search		Printer Friendly		Calculate List Fees	
Business Entity Information					
Status:	Active	File Date:	11/30/1989		
Type:	Foreign Corporation	Entity Number:	C10065-1989		
Qualifying State:	DE	List of Officers Due:	11/30/2013		
Managed By:		Expiration Date:			
NV Business ID:	NV19891037115	Business License Exp:	11/30/2013		
Registered Agent Information					
Name:	CSC SERVICES OF NEVADA, INC.	Address 1:	2215-B RENAISSANCE DR		
Address 2:		City:	LAS VEGAS		
State:	NV	Zip Code:	89119		
Phone:		Fax:			
Mailing Address 1:		Mailing Address 2:			
Mailing City:		Mailing State:	NV		
Mailing Zip Code:					
Agent Type:	Commercial Registered Agent - Corporation				
Jurisdiction:	NEVADA	Status:	Active		
View all business entities under this registered agent					
Financial Information					
No Par Share Count:	0	Capital Amount:	\$ 1,000.00		
Par Share Count:	1,000.00	Par Share Value:	\$ 1.00		
Officers <input type="checkbox"/> Include Inactive Officers					
Treasurer - ERIC HESSION					
Address 1:	ONE CAESARS PALACE DR	Address 2:			
City:	LAS VEGAS	State:	NV		
Zip Code:	89109	Country:			
Status:	Active	Email:			
Director - GARY W LOVEMAN					
Address 1:	ONE CAESARS PALACE DR	Address 2:			
City:	LAS VEGAS	State:	NV		

Zip Code:	89109	Country:	
Status:	Active	Email:	
President - GARY W LOVEMAN			
Address 1:	ONE CAESARS PALACE DR	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89109	Country:	
Status:	Active	Email:	
Director - MICHAEL D COHEN			
Address 1:	ONE CAESARS PALACE DR	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89109	Country:	
Status:	Active	Email:	
Secretary - MICHAEL D COHEN			
Address 1:	ONE CAESARS PALACE DRIVE	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89109	Country:	
Status:	Active	Email:	

Actions/Amendments

[Click here to view 23 actions/amendments associated with this company](#)

Attachment B – Variance Application Letter



Michael Cohen
SVP, Deputy General Counsel
and Corporate Secretary
Tel: 702.407.6029
Email: micohen@caesars.com

January 7, 2013

VIA FEDERAL EXPRESS

Glenn D. Savage
Environmental Health Division (EHD) Director
Southern Nevada Health District
330 South Valley View Boulevard
Las Vegas, NV 89127

Re: **Variance Application Letter – Corner Investment Company, LLC
dba Bill's Gamblin' Hall & Saloon**

Dear Mr. Savage:

Please accept this letter, together with the Variance Candidate Worksheet and preliminary plans and section of the referenced project's 10th and 11th floors pool deck areas, as the request of the Owner for a variance from NAC 444.134 requiring unobstructed decks around a pool, and NAC 444.454 requiring unobstructed decks around a spa, so as to accommodate these water bodies with raised edges.

Specifically, the variance application is to grant a condition that two pools be constructed with a 12" wide edge 14" above the deck and one spa be constructed with a 12" wide edge 18" above the deck. This is requested because the necessary building structural trusses spanning the horizontal distances on the 10th floor preclude being able to recess the pool flush with the deck to accommodate all the project elements. On the 11th floor, the available floor to ceiling dimension does not accommodate the spa being recessed to deck elevation.

Please note the current business address of the Owner, Corner Investment Propco, LLC and the Operator, Corner Investment Company, LLC d/b/a Bill's Gamblin' Hall & Saloon, is 3595 Las Vegas Boulevard South, Las Vegas, NV 89109. The Assessor's Parcel Number is 162-21-101-001 and 162-21-101-003. The contact name for the Owner/Operator is Lee Monfort and the contact phone number is (702) 407-6288.

Per the plans reviewed and discussed at a November 28, 2012 Variance Meeting at the Southern Nevada Health District, the two 10th floor pools' water depth varies from 9" to 3'-6", and on the 11th floor the small infinity edge spa's proposed water depth is 3'-0". In each instance the edge of the water bodies is surrounded by minimum 4'-0" wide decks, fully compliant with the requirements of NAC 444.134 and NAC 444.454. However, on the 10th floor, necessary structural trusses spanning a North - South orientation preclude depressing the water bodies to the elevation where the pool coping would coincide with the deck. This structural configuration, intrinsic to the design of the building, causes a discrepancy between the pools' coping elevation and that of the adjacent deck. This can be readily and pragmatically resolved by raising the pool edges 14" above the elevation of the unobstructed, perimeter deck. On the 11th floor,

One Caesars Palace Drive
Las Vegas, Nevada 89109-8969

an infinity edge spa would intrusively encroach into the available 8' vertical headroom of the space beneath, unless its edge is similarly raised 18" above the surrounding deck.

For each water body, unhindered access to the entire water body will be maintained from the surrounding deck. Furthermore, stair entries compliant with the requirements of NAC 444.128 will be provided to enter the water bodies. Guests will also be able to enter the pools and spa by sitting on the edge and rotating their bodies. The raised edge will not create a tripping hazard as warning tiles will be installed on both the interior and exterior of the pools and spa. Also, consistent with typical pool design and the requirements of NAC 444.134.3 and NAC 444.454.9, a positive slope away from the raised edge of the water bodies and towards area deck drains will be provided to remove any water that splashes out from the pools and spa. The proposed 14" raised edge also mirrors the condition of the existing "Dish Pool" at The Hard Rock Hotel in Las Vegas, which has operated problem free.

EVIDENCE SUBMITTED FOR GRANTING A VARIANCE:

The evidence presented for granting a variance to permit Bill's Gamblin' Hall & Saloon to deviate from NAC regulation 444.134.1, i.e. accommodating a pool with a perimeter edge raised 14" above the surrounding deck, and NAC 444.454.1, i.e. accommodating a spa with a perimeter edge raised 18" above the surrounding deck, is listed below:

(a) There are circumstances or conditions which –

(1) Are unique to the applicant:

A unique condition exists at the project, i.e. the building's primary structural members include substantial steel trusses, intrinsic to the design, that preclude viably being able to tie the coping elevation of the new water bodies flush with the surrounding deck elevation. The matter is resolved by raising the pool edges 14" and the spa edge 18".

(2) Do not generally affect other persons subject to regulations:

Granting a variance will not affect other persons subject to regulations regarding pool or spa decks. The design of the water bodies will comply in all respects with the requirements of Nevada Administrative Code, Chapter 444 other than for the subsections cited.

(3) Make compliance with the regulation unduly burdensome:

Compliance with the current regulation would be unduly burdensome for Bill's Gamblin' Hall & Saloon. The building's structural steel would need to be reconfigured, which would necessitate extensive additional columns and slabs, temporary property closure, very extensive demolition and reconstruction, all at an exorbitant cost.

(4) Hardships caused and substantial property right abridged by complying with the regulation include:

(i) An extremely costly reconfiguration of the building's proposed structural steel design to eliminate the trusses which create the required spans would be required as well as a temporary property closure to complete the reconfiguration. The estimated additional cost of a reconfigured structural system is \$1,275,000 and the estimated loss of revenue during the closure is \$850,000.

(ii) Without being granted a variance to install the raised edge pools, the project would be deprived of important, high profile amenities. As well as being swimmable bodies of water, the pools afford iconic, signature marketing value to the use and operation of this rooftop space, in conjunction with a nightclub. Without these, the property would suffer impaired visibility, reduced property occupancy and decreased revenues. That opportunity cost is estimated to be at least \$850,000 per annum.



(b) Granting the Variance –

1. Is necessary to render substantial justice to the application and enable their preserving and enjoying a property right:

Granting the variance will allow the use of the deck for swimming and to provide amenities offering a high aesthetic value and aquatic ambience, in conjunction with the operation of a nightclub; a right currently enjoyed by other nearby properties.

2. Will not be detrimental or pose a danger to public health and safety:

Granting the variance will not be detrimental or pose a danger to public health and safety, because the pools and spa will be engineered to incorporate all necessary and code mandated safety provisions, as well as additional warning tiles and markings to delineate the raised pool edge condition.

Please feel free to contact Lee Monfort at 702-407-6288 with any questions.

Sincerely,

CORNER INVESTMENT COMPANY, LLC

By: CAESARS ENTERTAINMENT OPERATING COMPANY, INC.
Its: Sole Member

By: 


Name: Michael D. Cohen

Its: Secretary

cc: Lee Monfort
Rick Mazer



Attachment C: Assessor's Parcel Information

Michele W. Shafe, Assessor

REAL PROPERTY PARCEL RECORD

[Click Here for a Print Friendly Version](#)

Assessor Map	Aerial View	Building Sketch	Ownership History	Neighborhood Sales	New Search
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GENERAL INFORMATION	
PARCEL NO.	162-21-101-001
OWNER AND MAILING ADDRESS	CORNER INVESTMENT PROPCO L L C %C SOMMELLA 1 CAESARS PALACE DR LAS VEGAS NV 89109-8969
LOCATION ADDRESS CITY/UNINCORPORATED TOWN	3595 S LAS VEGAS BLVD PARADISE
ASSESSOR DESCRIPTION	PT NW4 NW4 SEC 21 21 61 SEC 21 TWP 21 RNG 61
RECORDED DOCUMENT NO.	* 20121102 01924
RECORDED DATE	11/02/2012
VESTING	NO STATUS

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

ASSESSMENT INFORMATION AND SUPPLEMENTAL VALUE	
TAX DISTRICT	470
APPRAISAL YEAR	2012
FISCAL YEAR	12-13
SUPPLEMENTAL IMPROVEMENT VALUE	0
SUPPLEMENTAL IMPROVEMENT ACCOUNT NUMBER	N/A

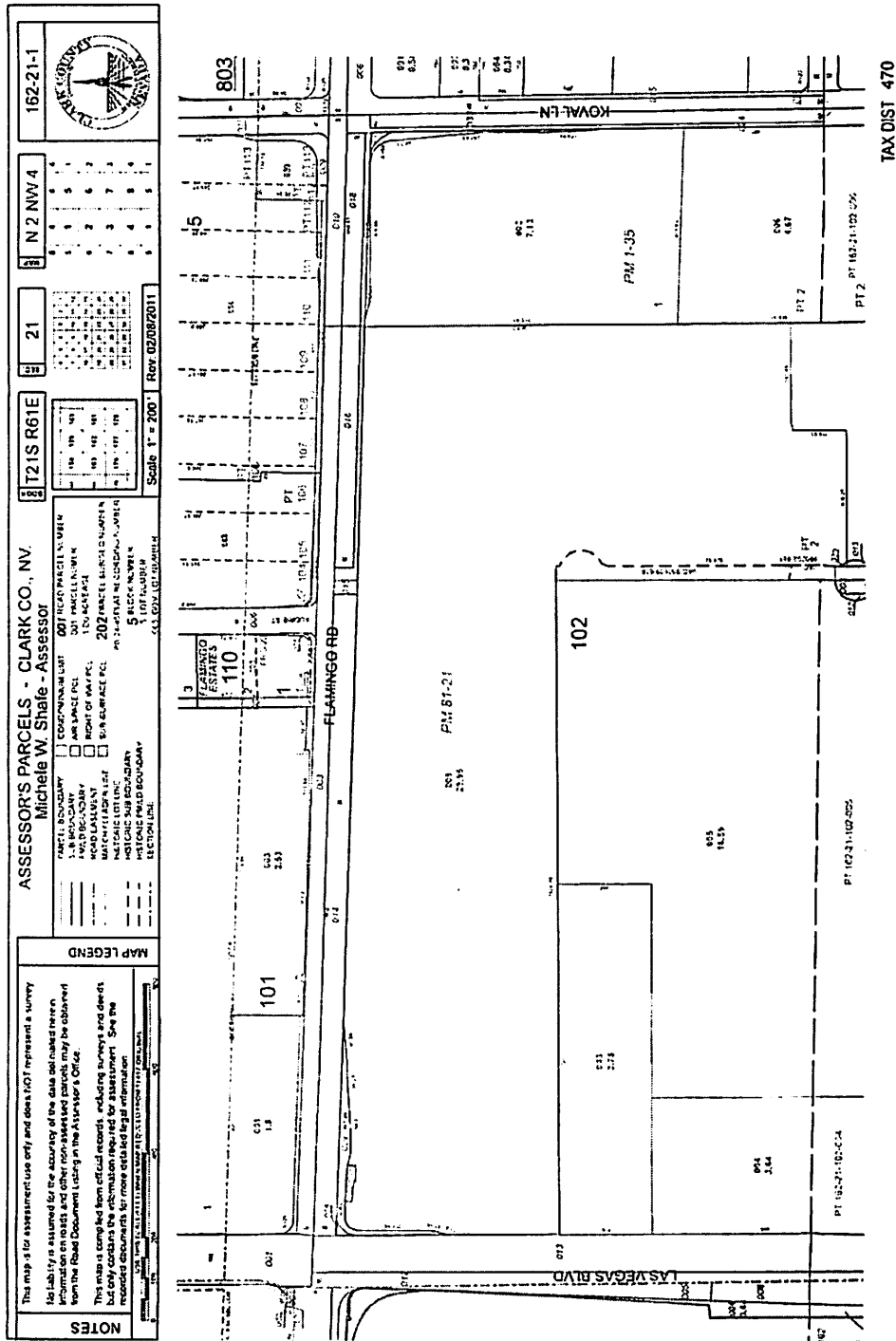
REAL PROPERTY ASSESSED VALUE		
FISCAL YEAR	2012-13	2013-14
LAND	2091142	2091142
IMPROVEMENTS	6698463	6535572
PERSONAL PROPERTY	0	0
EXEMPT	0	0
GROSS ASSESSED (SUBTOTAL)	8789605	8626714
TAXABLE LAND+IMP (SUBTOTAL)	25113157	24647754
COMMON ELEMENT ALLOCATION ASSD	0	0
TOTAL ASSESSED VALUE	8789605	8626714
TOTAL TAXABLE VALUE	25113157	24647754

[Click here for Treasurer Information regarding real property taxes.](#)

[Click here for Flood Control Information.](#)

ESTIMATED LOT SIZE AND APPRAISAL INFORMATION	
ESTIMATED SIZE	1.80 Acres
ORIGINAL CONST. YEAR	1979
LAST SALE PRICE MONTH/YEAR	15700000 08/05
LAND USE	3-11 COMMERCIAL HOTELS
DWELLING UNITS	200

Attachment D: Assessor's Map



Attachment E: Affidavit of Public Notice

AFFIDAVIT OF PUBLICATION

STATE OF NEVADA
COUNTY OF CLARK SS:

Stacey M. Lewis, being first duly sworn, deposes and says: That she is the Legal Clerk for the Las Vegas Review-Journal and the Las Vegas Sun, daily newspapers regularly issued, published and circulated in the City of Las Vegas, County of Clark, State of Nevada, and that the advertisement, a true copy attached for,

SOUTHERN NEVADA HEALTH DIST 7691204SOJ 8234453

was continuously published in said Las Vegas Review-Journal and / or Las Vegas Sun in 1 edition(s) of said newspaper issued from 12/08/2012 to 12/08/2012, on the following days:

12/08/2012

LINDA ESPINOZA
Notary Public State of Nevada
No. 00-64108-1
My Appl. Exp. July 17, 2016

Signed: _____

SUBSCRIBED AND SWORN BEFORE ME THIS, THE

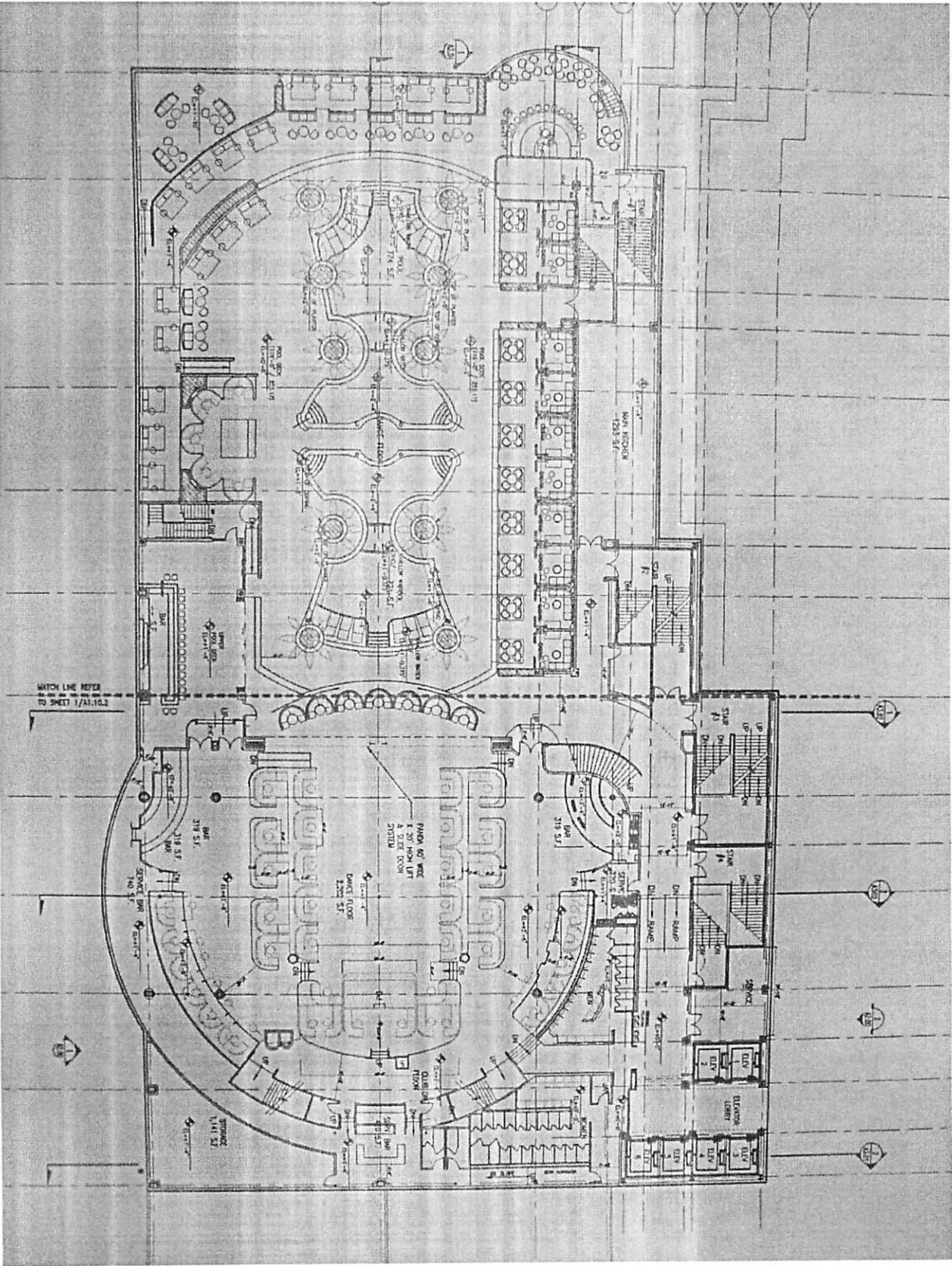
11th day of December 2012.

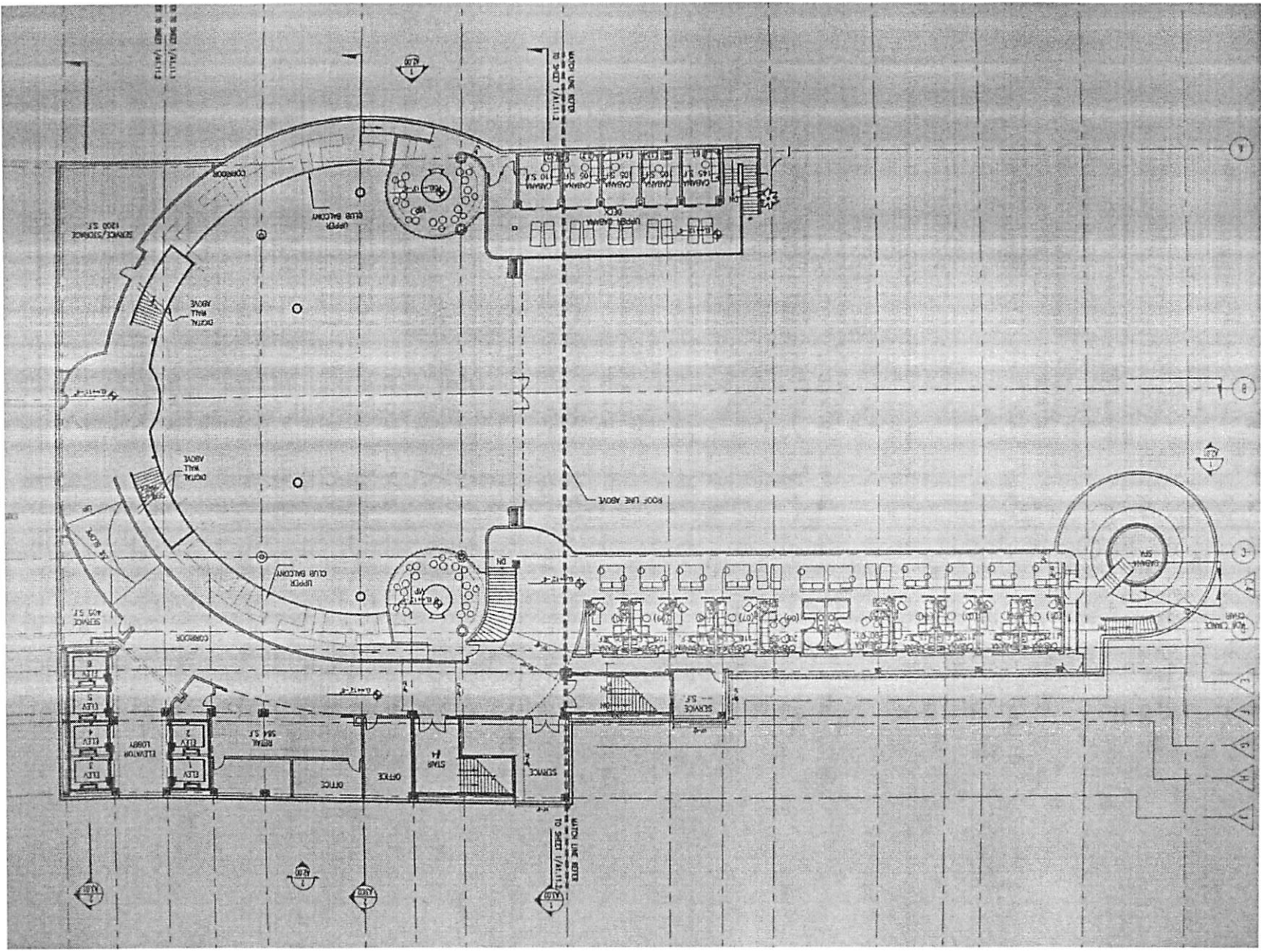
Notary Public

SNVD
PUBLIC NOTICE

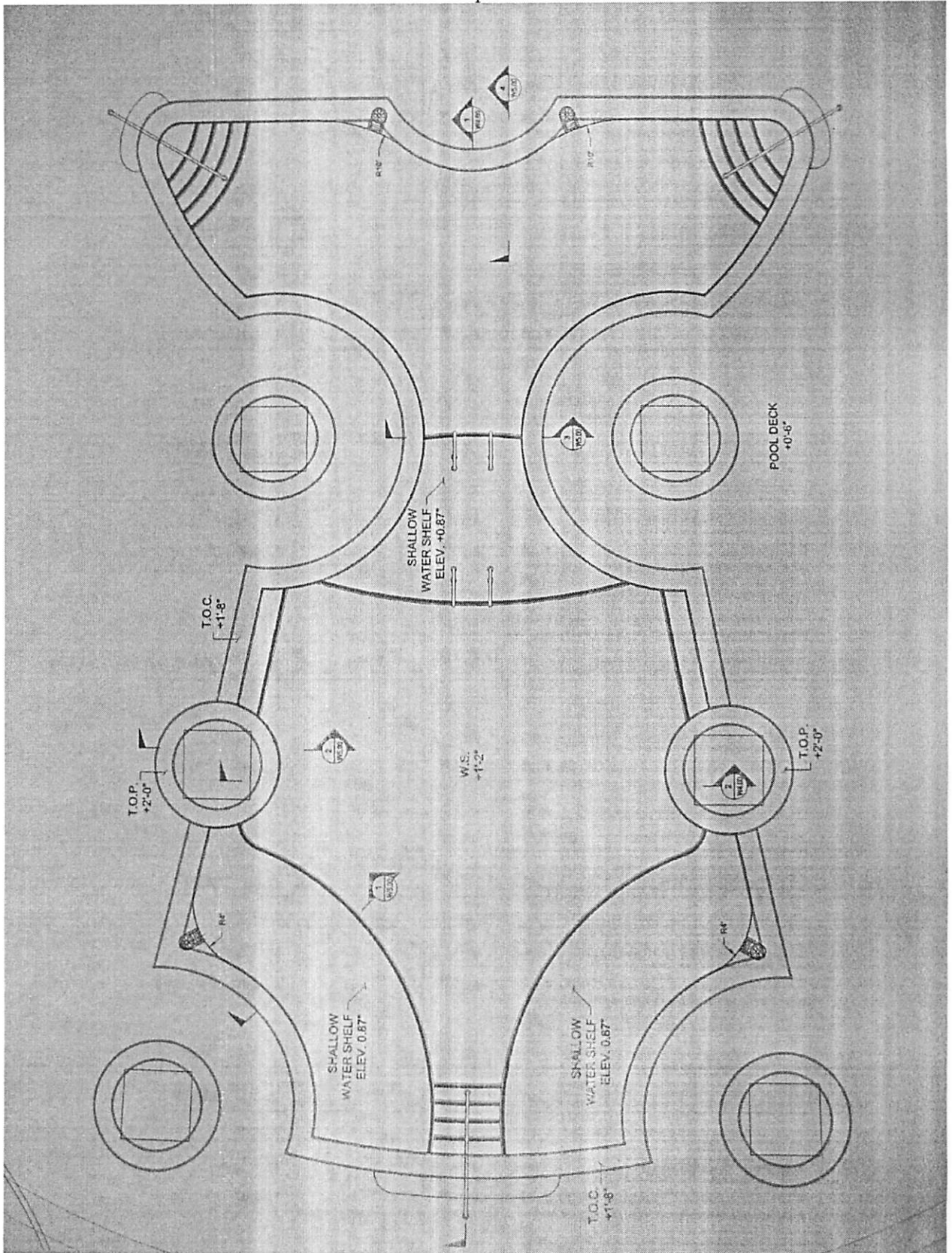
The Southern Nevada Health District, Board of Health and Human Services, is hereby giving notice to the public that it is currently reviewing an application for a variance from the provisions of the Health District Ordinance No. 2009-01, which requires that all health facilities maintain a minimum of 100 beds. The applicant is Bill's Gamblin' Hall & Saloon, located at 1111 S. Durango Avenue, Las Vegas, NV 89102. The applicant is requesting a variance to allow the facility to operate with a minimum of 50 beds. The applicant has provided a detailed plan of operations and a financial statement to support its request. The Board of Health and Human Services will hold a public hearing on the application on January 24, 2013, at 10:00 AM in the Board Room, 1111 S. Durango Avenue, Las Vegas, NV 89102. Any interested party may appear at the hearing to provide testimony or evidence in support of or in opposition to the application. A copy of the application and the Board's decision will be made available to the public upon request.

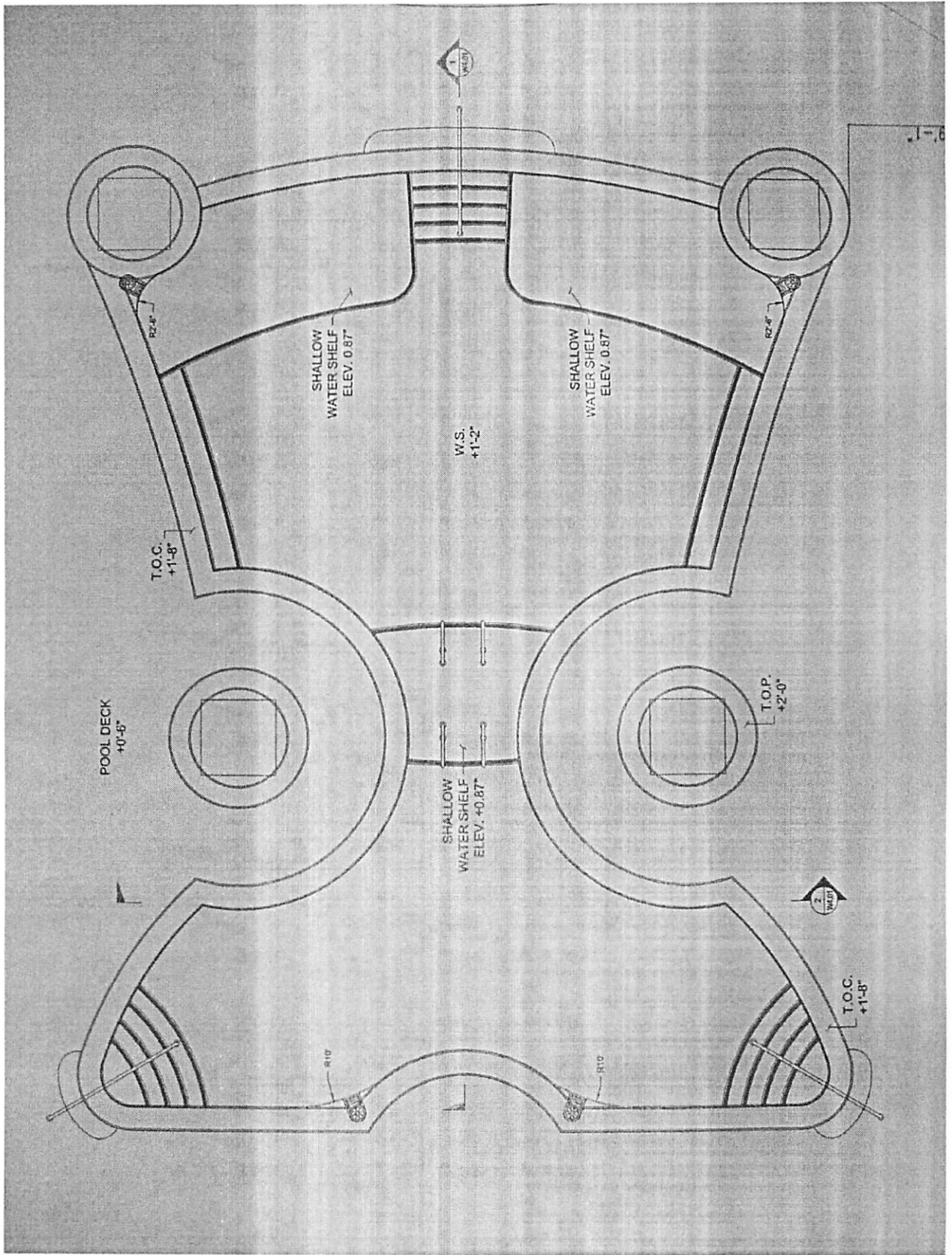
Attachment G: Proposed Construction Site Plans

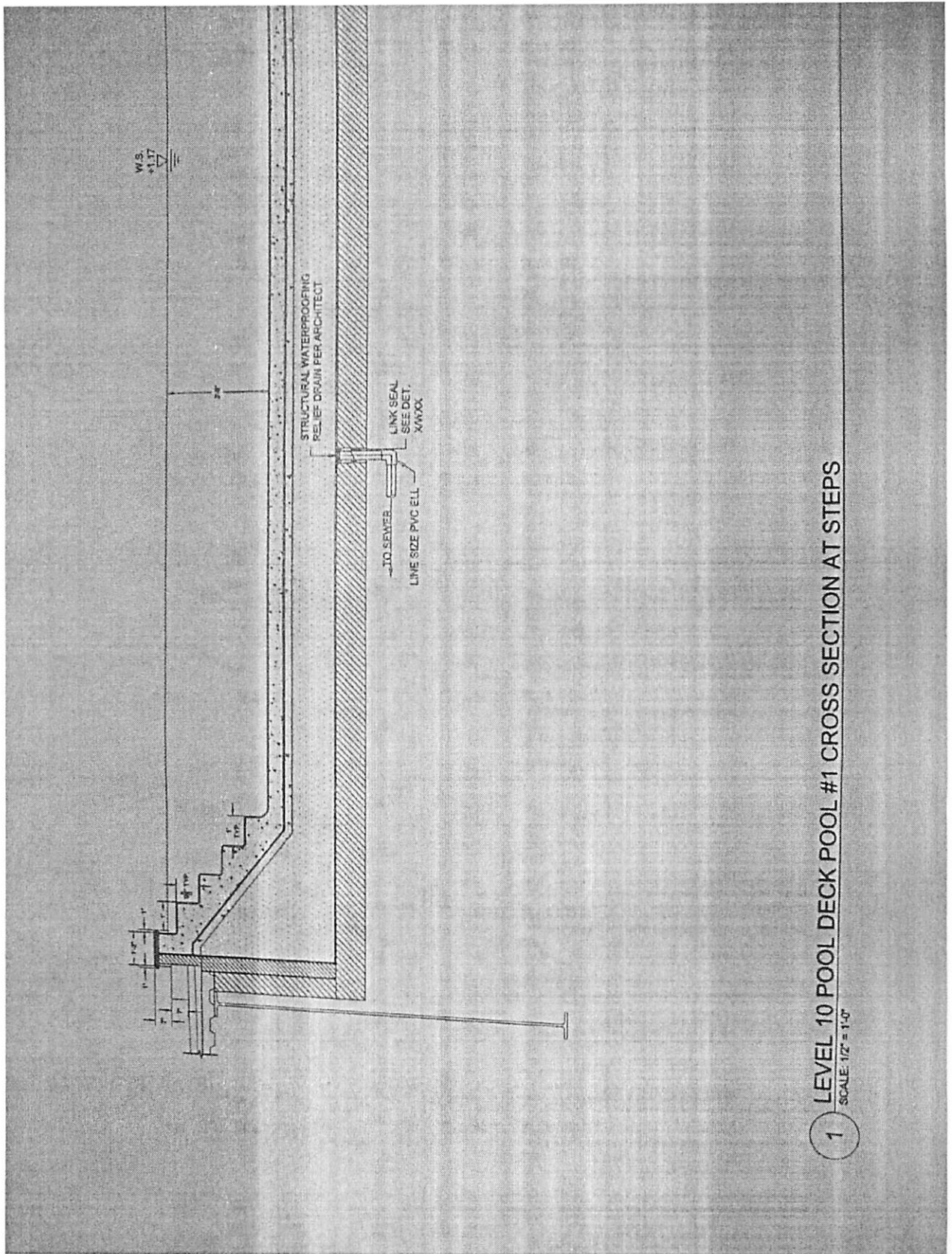


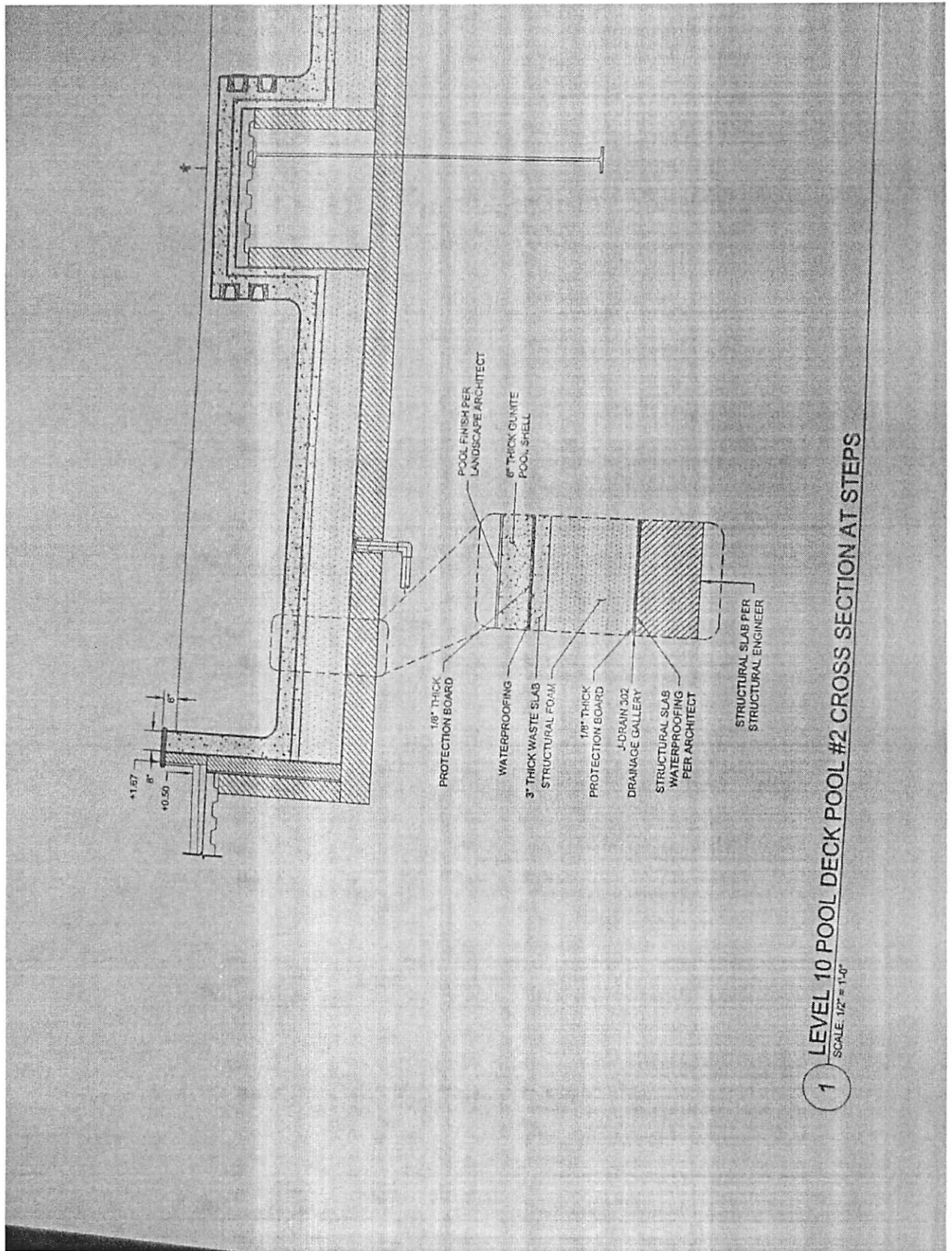


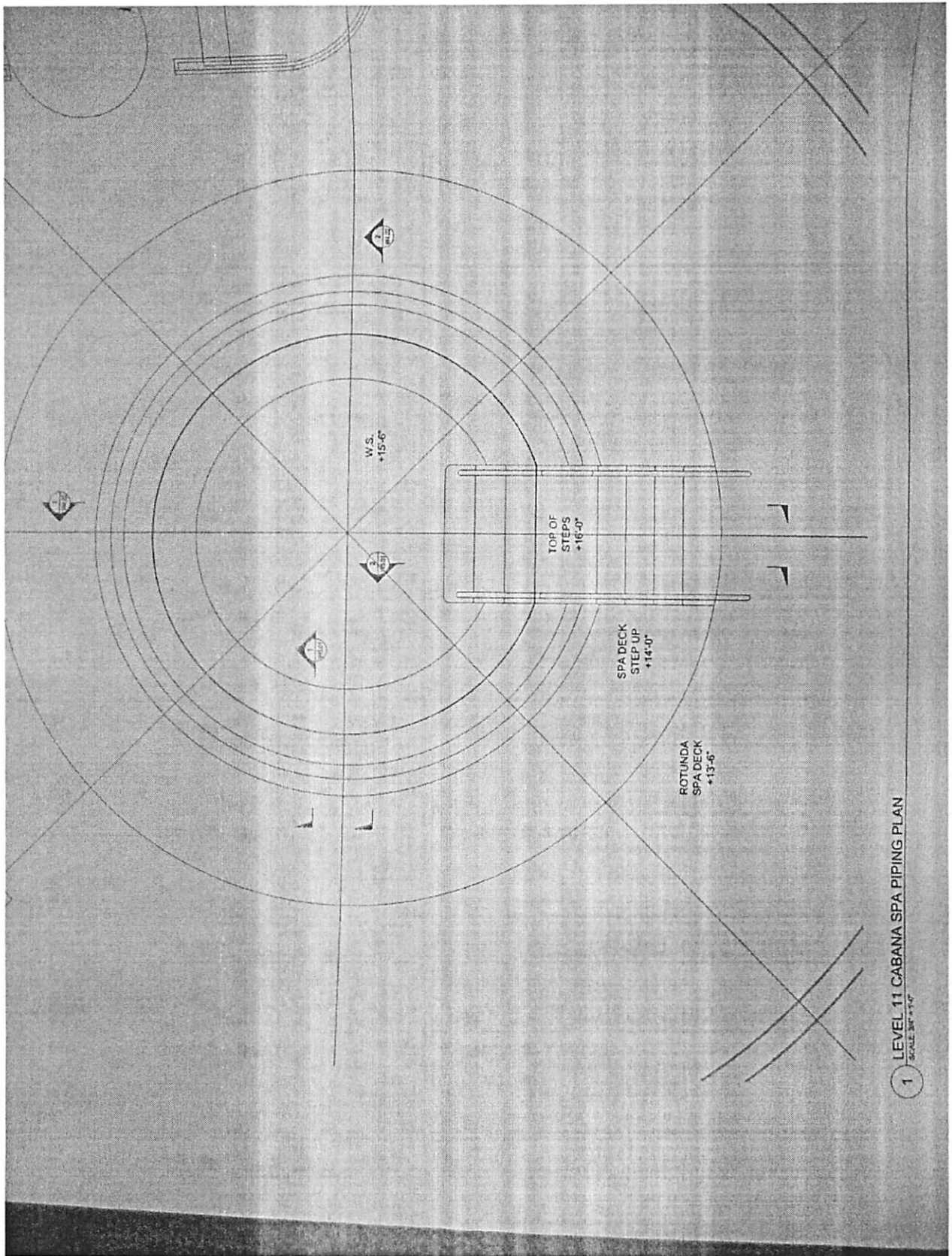
Attachment H: Pool and Spa Plans and Sections











1 LEVEL 11 CABANA SPA TYPICAL EDGE SECTION
SCALE: 1" = 1'-0"

