

STAFF REPORT TO THE PLANNING AND ZONING COMMISSION
DEPARTMENT OF PLANNING AND NEIGHBORHOOD SERVICES
COMMUNITY PLANNING DIVISION
CASE TYPE – REZONE
CASE PLANNER: AMELIA DOMBY

Hearing Date: March 24, 2025

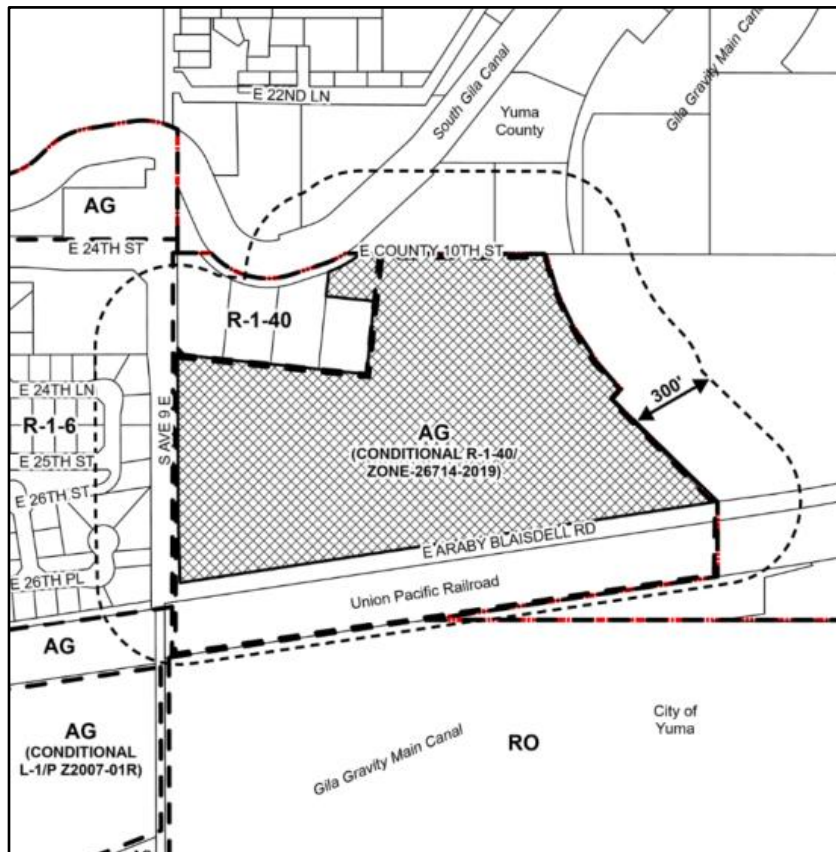
Case Number: ZONE-43589-2025

Project Description/
Location:

This is a request by Dahl, Robins & Associates, on behalf of North Valley Development, Yuma, LLC, to rezone approximately 33.38 acres from the Agriculture (AG) District to the Low Density Residential (R-1-6) District, for the property located near the southeast corner of Avenue 9E and 24th Street, Yuma, AZ.

	Existing Zoning	Use(s) on-site	General Plan Designation
Site	Agriculture (AG) District (Conditional R-1-40 District)	Undeveloped	Low Density Residential
North	Low Density Residential (R-1-40); Yuma County (SR-1/SR-2)	Residential	Low Density Residential/ Resort\Recreation\Open Space
South	Agriculture (AG)	Railroad	Resort\Recreation\Open Space
East	Yuma County	Gila Gravity Main Canal	Resort\Recreation\Open Space
West	Low Density Residential	Residential	Low Density Residential

Location Map



Prior site actions: Annexation: Ord. O2019-009 (March 22, 2019); General Plan Amendment: Res. R2007-69 (November 20, 2007); Resort/Recreation/Open Space to Low Density Residential); Rezone: AG to Low Density Residential (R-1-40) District; O2019-33 (October 2, 2019) Expired.

Staff Recommendation: Staff recommends **APPROVAL** of the rezoning from the Agriculture (AG) District to the Low Density Residential (R-1-6) District, subject to the conditions shown in Attachment A.

Suggested Motion: Move to **APPROVE** Rezone ZONE-43589-2025 as presented, subject to the staff report, information provided during this hearing, and the conditions in Attachment A.

Effect of the Approval: By approving the rezone, the Planning and Zoning Commission is recommending approval to City Council for the request to rezone approximately 33.38 acres from the Agriculture (AG) District to the Low Density Residential (R-1-6) District for the property located at near the southeast corner of Avenue 9E and 24th Street, subject to the conditions outlined in Attachment A, and affirmatively finds that the request is in conformance with the City of Yuma General Plan.

Staff Analysis: The subject property is located near the southeast corner of Avenue 9E and 24th Street. The site is currently undeveloped and is approximately 33.38 acres in size.

It is the intent of the applicant to subdivide the property for the future construction of approximately 85 single-family dwellings. According to the conceptual site plan, the lots will range in size from approximately 6,000 square feet to 19,672 square feet.

Further specified in 154-05.04, the following are some of the development standards required of a development within the Low Density Residential (R-1-6) District:

1. The maximum lot coverage in the Low Density Residential (R-1-6) District shall not exceed 50% of the lot area;
2. A minimum front yard setback of 20 feet;
3. A minimum side yard setback of 7 feet;
4. A minimum rear yard setback of 10 feet;
5. A maximum building height of 40 feet; and
6. A requirement for each lot to provide 2 off-street parking spaces, appropriately located.

A neighborhood meeting was held on February 12, 2025, to discuss the proposed project with neighbors and property owners within the surrounding area. During the neighborhood meeting, there were eight neighbors in attendance. The neighbors expressed their concern with traffic congestion on Avenue 9E due to school traffic and the railroad, vehicular accidents, future subdivision landscaping, the lack of common open space for the residents of the subdivision, and property values. The neighbors also noted that Yuma County was awarded a grant through the Railroad Crossing Elimination (RCE) Grant program for project planning and activities to examine the feasibility of grade-separating three crossings in Yuma County (9E, Fortuna Road, and County 29E). During the neighborhood meeting, it was suggested by the neighbors to create four larger lots to mirror the existing four approximately 1-acre properties (Patagonia Development). With intent to provide a more consistent density between the existing and future homes.

The applicant has provided a conceptual layout of the proposed subdivision (Attachment B). However, the design and layout of the subdivision has not been finalized. The developer is working with the city to address traffic concerns through the subdivision design plat process. Through this process, the developer will address traffic mitigation, turn lanes and non-access easements. In addition, CIP Project Number 0441-ROAD2 is a Capacity Increase project on 9E from 24th Street to North Frontage Road for a new 4 lane roadway and bridge widening.

The request to rezone the property from the Agriculture (AG) District to the Low Density Residential (R-1-6) District is in conformance with the General Plan.

1. Does the proposed zoning district conform to the Land Use Element? Yes.

Land Use Element:									
Land Use Designation:				Low Density Residential					
Issues:				None					
Historic District:	Brinley Avenue			Century Heights		Main Street		None	X
Historic Buildings on Site:	Yes			No	X				

2. Are there any dedications or property easements identified by the Transportation Element? No.

FACILITY PLANS						
Transportation Master Plan	Planned	Existing	Gateway	Scenic	Hazard	Truck
Avenue 9E – 4-Lane Minor Arterial	50 FT H/W ROW	50 FT H/W ROW				X
24th Street – 4-Lane Minor Arterial	50 FT H/W ROW	50 FT H/W ROW		X		
Bicycle Facilities Master Plan	Bike lane at Avenue 9E and 24 th Street					
YCAT Transit System	AWC/NAU/UA Transfer Hub					
Issues:	None					

3. Does the proposed rezoning of the property conform to the remaining elements of the general plan? Yes.

Parks, Recreation and Open Space Element:															
Parks and Recreation Facility Plan															
Neighborhood Park:	Existing: Desert Ridge Park			Future: None											
Community Park:	Existing: Kennedy Park			Future: East Mesa Community Park											
Linear Park:	Existing: None			Future: "A" Canal Linear Park											
Issues:	None														
Housing Element:															
Special Need Household:	N/A														
Issues:	None														
Redevelopment Element:															
Planned Redevelopment Area:	N/A														
Adopted Redevelopment Plan:	North End:			Carver Park:		None:	X								
Conforms:	Yes		No		N/A										
Conservation, Energy & Environmental Element:															

Impact on Air or Water Resources	Yes		No	X		
Renewable Energy Source	Yes		No	X		
Issues:	None					
Public Services Element:						
Population Impacts Population projection per 2018-2022 American Community Survey Police Impact Standard: 1 officer for every 530 citizens; 2020 Conservation Plan Water demand: 207 gallons/day/person; Wastewater generation: 70 gallons per day per person	Dwellings & Type		Projected Population	Police Impact	Water Consumption	Wastewater Generation
	<i>Single Family</i>					
	Maximum	Per Unit		Officers	GPD	AF
	164	2.7	443	0.84	91,660	102.7
	Minimum					
	33	2.7	89	0.17	18,444	20.7
						6,237
Fire Facilities Plan:	Existing: Fire Station No. 5		Future: Fire Station No. 5			
Water Facility Plan:	Source:	City	X	Private	Connection:	16" AC
Sewer Facility Plan:	Treatment:	City		Septic	Private	Connection: See below.
Issues:	Water line extension required. Public or private sewer connection is not known at this time.					
Safety Element:						
Flood Plain Designation:	Flood Zone X		Liquefaction Hazard Area:		Yes	No
					X	
Issues:	None					
Growth Area Element:						
Growth Area:	Araby Rd & Interstate 8		Arizona Ave & 16 th St		Avenue B & 32 nd St.	
	North End		Pacific Ave & 8 th St		Estancia	None
Issues:	None					

4. Does the proposed rezoning conform to the adopted facilities plan?

Yes.

5. Does the proposed rezoning conform to Council's prior approval of rezonings, development agreements or subdivisions for this site?

Yes.

External Agency Comments: See Attachment D

Neighborhood Meeting Comments: See Attachment E

Proposed conditions delivered to applicant on: February 27, 2025

Final staff report delivered to applicant on: March 19, 2025

☒ Applicant agreed with the Conditions of Approval on March 18, 2025.

Attachments

A	B	C	D	E	F	G	H	I
Conditions of Approval	Conceptual Site Plan	Agency Notifications	Agency Comments	Neighborhood Meeting Comments	Public Comments	Neighbor Notification List	Post-card	Aerial Photo

Prepared By: *Amelia Domby*

Amelia Domby
Principal Planner

Amelia.Domby@yumaaaz.gov

Date: March 3, 2025

(928)373-5000, x1234

Reviewed By: *Jennifer L. Albers*

Jennifer L. Albers
Assistant Director of Planning

Date: *3/3/25*

Approved By: *Alyssa Linville*

Alyssa Linville
Director, Planning and Neighborhood Services

Date: **03/19/2025**

ATTACHMENT A
CONDITIONS OF APPROVAL

The following conditions have been found to have a reasonable nexus and are roughly proportionate to the impact of the proposed rezone for the site:

Department of Planning and Neighborhood Services Comments: Alyssa Linville, Director (928) 373-5000, x 3037:

1. The conditions listed below are in addition to City codes, rules, fees and regulations that are applicable to this action.
2. The Owner's signature on the application for this land use action shall constitute a waiver of any claims for diminution in value pursuant to A.R.S. § 12-1134.

Department of Engineering Comments: Jerry Anaya, Engineering Manager, (928) 373-5182

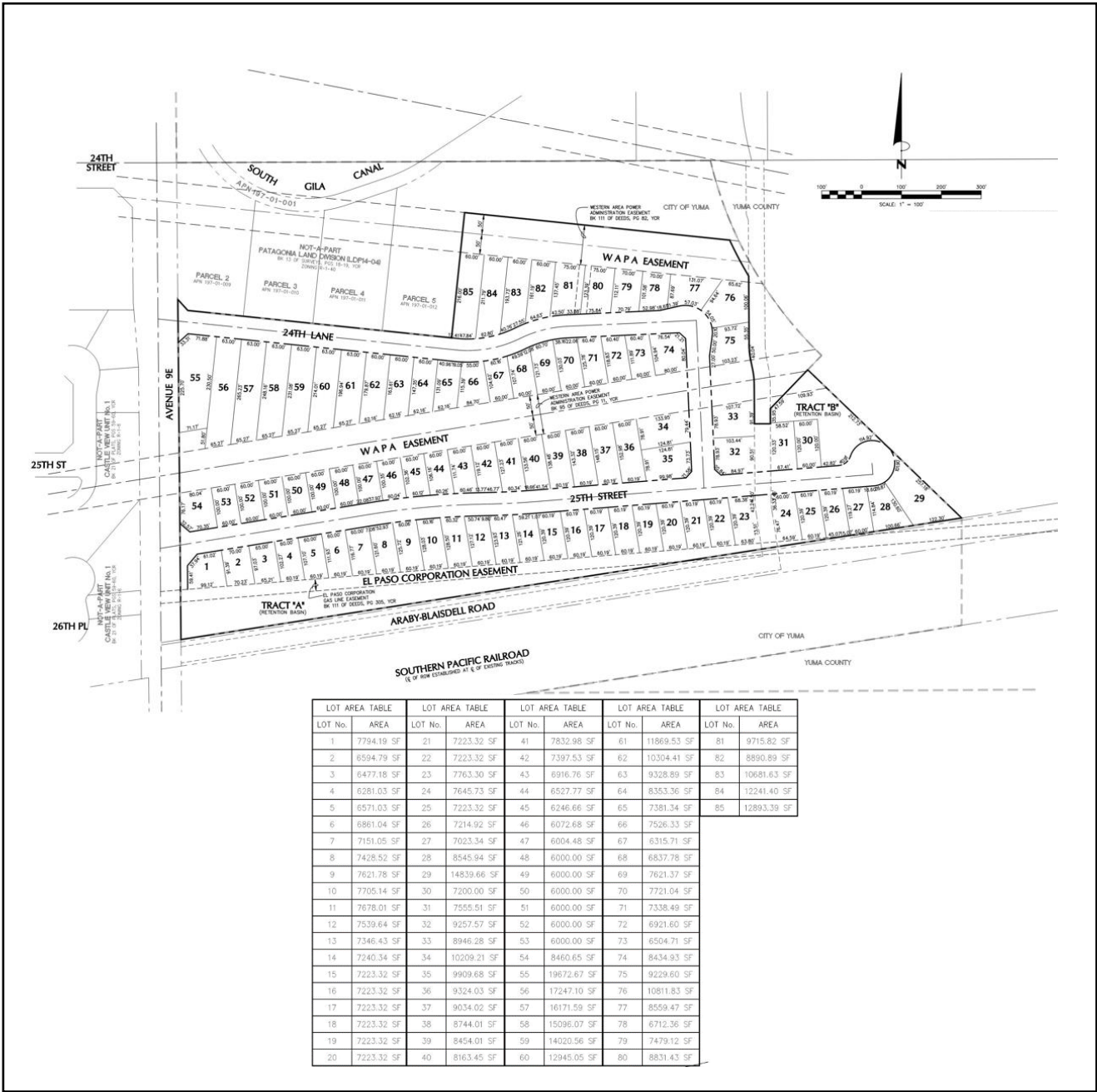
3. A raised median disclosure shall be recorded on the property acknowledging a median may be constructed within the 9E Street right-of-way that may limit left turning movements into and of the site.

Department of Planning and Neighborhood Services Comments: Amelia Domby, Principal Planner, (928) 373-5000, x 3034

4. Each of the conditions listed above shall be completed within two (2) years of the effective date of the rezoning ordinance or prior to the issuance of a Building Permit, Certificate of Occupancy or City of Yuma Business License for this site, whichever occurs first. If the conditions of approval are not completed within the above timeframe then the rezone shall be subject to ARS § 9-462.01.

Any questions or comments regarding the Conditions of Approval as stated above should be directed to the staff member who provided the comment. Name and phone numbers are provided.

ATTACHMENT B
CONCEPTUAL SITE PLAN



ATTACHMENT C

AGENCY NOTIFICATIONS

- **Legal Ad Published: The Sun** 02//28/25
- **300' Vicinity Mailing:** 02/03/25
- **34 Commenting/Reviewing Agencies noticed:** 02/06/25
- **Site Posted on:** 02/05/25
- **Neighborhood Meeting:** 02/12/25
- **Hearing Date:** 03/24/25
- **Comments due:** 02/17/25

External List (Comments)	Response Received	Date Received	"No Comment"	Written Comments	Comments Attached
Yuma County Airport Authority	YES	02/06/25	X		
Yuma County Engineering	NR				
Yuma County Public Works	NR				
Yuma County Water Users' Assoc.	YES	02/06/25	X		
Yuma County Planning & Zoning	NR				
Yuma County Assessor	NR				
Arizona Public Service	NR				
Time Warner Cable	NR				
Southwest Gas	NR				
Qwest Communications	NR				
Bureau of Land Management	NR				
YUHS District #70	NR				
Yuma Elem. School District #1	NR				
Crane School District #13	NR				
A.D.O.T.	NR				
Yuma Irrigation District	NR				
Arizona Fish and Game	NR				
USDA – NRCS	NR				
United States Postal Service	NR				
Yuma Metropolitan Planning Org.	NR				
El Paso Natural Gas Co.	NR				
Western Area Power Administration	YES	02/12/25			X
City of Yuma Internal List (Conditions)	Response Received	Date Received	"No Conditions"	Written Conditions	Comments Attached
Police	NR				
Parks & Recreation	NR				
Development Engineer	NR				
Fire	YES	02/05/25	X		
Building Safety	NR				
City Engineer	NR				
Traffic Engineer	NR				
MCAS / C P & L Office	YES	02/14/25			X
Utilities	NR				
Public Works	NR				
Streets	NR				

ATTACHMENT D
AGENCY COMMENTS

☒ COMMENT ☐ NO COMMENT

Enter comments below:

Western Area Power Administration (WAPA) has up to 3 transmission lines that traverse thru this area that is being proposed to develop. Please have the landowner contact WAPA prior to ANY construction or encroachment activities occurring within WAPA's right of way.

DATE: 2/12/25 NAME: Dennis Patane TITLE: Realty Specialist
AGENCY: Western Area Power Administration-DSW Region
PHONE: 602 726-5331
RETURN TO: Amelia Domby
Amelia.Domby@YumaAZ.gov

Conditions of approval must be written in the form of a formal condition for use in staff's report. Your conditions will be used verbatim. If you also have a comment, please indicate below.

☒ Condition(s) ☐ No Condition(s) ☐ Comment

Enter conditions here: Subject parcel is located near a known flight path. It is requested an Avigation Disclosure statement be recorded to recognize the noise, interference, or vibrations due to aviation operations that may occur at the nearby Marine Corps Air Station Yuma, Yuma International Airport Aviation Complex, and its associated flight paths. Please send a copy of the recorded easement to MCASYUMA_CPLO@usmc.mil. Thank you for the opportunity to review and comment.

DATE: 14 Feb 2025 NAME: Antonio Martinez TITLE: Community Liaison Specialist
CITY DEPT: MCAS Yuma
PHONE: 928-269-2103
RETURN TO: Amelia Domby
Amelia.Domby@YumaAZ.gov

ATTACHMENT E
NEIGHBORHOOD MEETING COMMENTS

Date Held: February 12, 2025

Location: 9E & 24th Street

Attendees: City of Yuma Staff: Amelia Dombay; Applicant: Kevin Dahl and Adrian Vega; and (8) Neighbors in attendance: Quincy and Kyla Smith, Lizeth and Hermes Soto, Ann and Paul Rios, Sheldon and Kristina Scheffer.

SUMMARY OF ATTENDEE(S') COMMENTS RELATED TO THE PROJECT:

- STAFF INFORMED THE NEIGHBORS OF THE REZONE REQUEST AND THE UPCOMING PLANNING AND ZONING AND CITY COUNCIL HEARING DATES – P&Z MARCH 24, 2025, AND CITY COUNCIL MAY 7, 2025 AND MAY 21, 2025.
- NEIGHBORS IN ATTENDANCE EXPRESSED THEIR CONCERN WITH THE TRAFFIC ALONG AVENUE 9E. IN ADDITION, THE NEIGHBORS NOTED THAT VEHICLES ARE WAITING LONG PERIODS AT THE RAILROAD CROSSING. THEY ADDED THAT SCHOOL TRAFFIC (BUSES) ARE BACKED UP ALONG AVENUE 9E & 24TH STREET.
- KEVIN DAHL, APPLICANT, NOTED THAT THE DEVELOPER IS PROPOSING A 85 LOT RESIDENTIAL SUBDIVISION AND EXPLAINED THE PEAK HOUR TRIPS GENERATED BY THIS DEVELOPMENT.
- NEIGHBORS IN ATTENDANCE ALSO INDICATED THAT THERE ARE VEHICULAR ACCIDENTS AND ADDED THAT THIS PROPOSAL WILL INCREASE THE NUMBER OF VEHICULAR ACCIDENTS.
- THE NEIGHBORING PROPERTY OWNER NOTED SHE IS ON THE CITY OF YUMA CLEAN AND BEAUTIFUL COMMISSION AND EXPRESSED HER CONCERN WITH THE LANDSCAPING OF THE FUTURE SUBDIVISION. IN ADDITION TO THE LANDSCAPING CONCERNS, SHE NOTED THAT SHE WAS CONCERNED WITH THE LACK OF COMMON OPEN SPACE FOR THE RESIDENTS OF THE NEW SUBDIVISION. STAFF EXPLAINED THE REZONE AND SUBDIVISION PROCESS AND ADDED THAT STAFF REQUIRES A MID (MUNICIPAL IMPROVEMENT DISTRICT) FOR NEW SUBDIVISIONS, WHICH MAINTAINS THE SUBDIVISION LANDSCAPING.
- THE NEIGHBORS ASKED WHO THE DEVELOPER IS FOR THIS PROJECT. THE APPLICANT SAID ESTEBAN PEREZ AND STATED HE COULD PROVIDE CONCEPTS FOR THE HOMES.
- THE NEIGHBORS NOTED THAT THEY WERE INFORMED THIS PROPERTY WOULD BE DEVELOPED WITH ONE ACRE LOTS – SIMILAR TO THE EXISTING FOUR RESIDENTIAL LOTS (PATAGONIA).
- THE APPLICANT NOTED THAT THE LAND USE OF THIS PROPERTY IS LOW DENSITY RESIDENTIAL, WHICH ALLOWS A NUMBER OF LOW DENSITY RESIDENTIAL ZONING DISTRICTS. THE APPLICANT ADDED THAT THERE IS A NEED FOR MORE HOUSING IN YUMA.
- NEIGHBORS ASKED IF THERE WERE ADDITIONAL CONSTRUCTION STANDARDS FOR HOMES ADJACENT TO THE RAILROAD BECAUSE OF THE VIBRATION FROM THE TRAIN.
- THE NEIGHBORS COMMENTED THAT THE RETENTION BASINS WITHIN EXISTING SUBDIVISIONS CANNOT BE USED BY THE RESIDENTS OF THE SUBDIVISION.
- NEIGHBORS QUESTIONED WHETHER THIS FUTURE SUBDIVISION WOULD HAVE AN HOA. STAFF STATED THAT IS DETERMINED BY THE DEVELOPER.
- NEIGHBORS ALSO EXPRESSED THEIR CONCERN WITH PROPERTY VALUES.
- NEIGHBORS IN ATTENDANCE ALSO DISCUSSED THE GRANT AWARDED TO YUMA COUNTY FOR A FEASIBILITY STUDY THROUGH THE RAILROAD CROSSING ELIMINATION (RCE) GRANT PROGRAM.
- THE NEIGHBORING PROPERTY OWNERS AND APPLICANT ALSO DISCUSSED POTENTIAL CHANGES TO THE SITE PLAN (MIRRORING THE EXISTING FOUR RESIDENTIAL LOTS) AND ADDING OPEN SPACE.
- THE APPLICANT ALSO DISCUSSED ACCESS CONCERNS AND RIGHT-IN AND RIGHT-OUT TURNS INTO THE SUBDIVISION.

**ATTACHMENT F
PUBLIC COMMENTS
INCLUDING NEIGHBOR LETTER & SITE PLAN**

Name:	Elena Graff	Contact Information: (928) 261-5732, 2671 S. Danette Way									
Method of Contact:	Phone	<input checked="" type="checkbox"/>	FAX	<input type="checkbox"/>	Email	<input type="checkbox"/>	Letter	<input type="checkbox"/>	Other	<input type="checkbox"/>	
<p>Contacted staff and asked for more information about the rezone request. She stated she tried to attend the neighborhood meeting; however, did not see anybody on-site. She expressed her concern with increased traffic in the area.</p>											

Hello Kevin and Amelia – Thank you for taking the time to meet with us last night. I have attached the proposed site plan with edits capturing some of the comments from last night's neighborhood meeting.

Common Area: As mentioned last night, one of our major concerns is having another Yuma subdivision approved where the common area is reduced to a single undeveloped lot serving as a retention basin in the corner of the subdivision, often hidden from view and eventually filled in with rock. With the subject property being completely bordered by train tracks, canals and a busy street, this leaves no place for children and families from 85 plus lots to play. With the small, out of sight common area presented last night, I fear children will be forced to play near the train or busy street. Therefore, I have proposed (in orange highlight) a larger common area that opens up to the neighborhood, is much larger, and only sacrifices a single lot for the developer.

Existing Restriction North of Lot 5: I have marked the north area of the site plan in yellow highlight showing the area restricted from development by the existing CCR's approved by the previous owner (attached, page 1, Item 3.). We are requesting the new owner/City honor this restriction by adopting the language in the new zoning. The contract addendum with this language has also been attached.

Revision of Lots 55-65: Lots 55-65, located across the street from the four existing lots, have been highlighted to be increased to mirror the sizes of existing lots (Patagonia lots 2-5). These lots should also adopt the same CCRs as Patagonia lots 2-5. I have attached those CCR's for reference. This is in an effort to minimize the appearance of mixed zoning that the City of Yuma continues to approve, which leads to our town looking mismatched and hodgepodge.

Comments mentioned above and additional neighborhood concerns:

- Negative impact of additional traffic in the area with the already congested 9E
- Lack of subdivision landscaping bordering 9E and Blaisdell Road. (Any future landscape plans requested to be provided to existing residents.)
- Inconsistent zoning: i.e. lot sizes as low as 6000sq ft near 1+acre custom lots
- Small, hidden common area
- WAPA easement open to off-roaders
- Train vibration impact on lots near tracks
- Impact on subdivision if/when a bridge for the train goes in. (A federal grant has already been awarded for a feasibility study.)

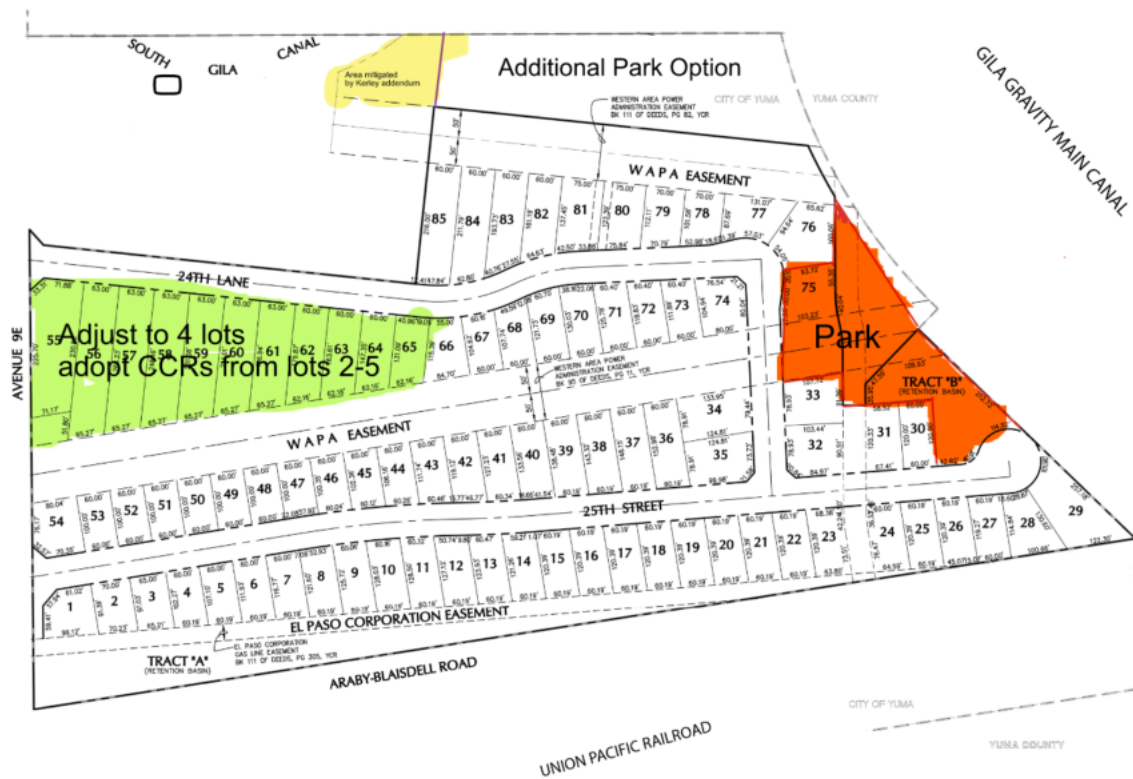
<https://www.kelly.senate.gov/newsroom/press-releases/kelly-gallego-announce-over-46-million-for-railroad-crossing-safety-and-infrastructure-upgrades-across-arizona/>

Attached:

- Marked site plan
- Patagonia CCRs
- Lot 5 Contract addendum

I appreciate you taking the time to consider these adjustments. Please let me know if you have any questions.

Thank you,
Kyla Smith, Patagonia Resident
kylacurtis@yahoo.com
928 502 2717



ATTACHMENT G
NEIGHBOR NOTIFICATION LIST

Property Owner	Mailing Address	City/State/Zip Code
ACOSTA RUDY S & LAURA A JT	2612 S DANETTE WAY	YUMA AZ 85365
BEZDECNY JESSICA ANN	9175 E 22ND LN	YUMA AZ 85365
CIRIGNANO MARVIN	27251 MESQUITE AVE	WELLTON AZ 85356
COUNTRY LIFE DEVELOPMENT INC AZ CORP	5155 ALKALI CREEK RD	BILLINGS MT 59106
CUELLAR FELIX & REYNALDA JT	9875 S AVENUE 9 E	YUMA AZ 85365
GRAFF ELENA A	2671 S DANETTE WAY	YUMA AZ 85365
HURTADO JULIAN E	8985 E 26TH PL	YUMA AZ 85364
JIMENEZ GERARDO	24341 MYERS AVE	MORENO VALLEY CA 92553
MAGALLON MARIO H & OLEGARIA JT	8990 E 24TH LN	YUMA AZ 85365
MARQUEZ DAVID & ELISA JT	8981 E 24TH LN	YUMA AZ 85365
MODRAGON PAUL & LAURIE TRUST 4-15-05	2469 S DANETTE WAY	YUMA AZ 85365
NAYLA TRUST 9-11-2024	2631 S DANETTE WY	YUMA AZ 85365
NORTH VALLEY DEVELOPMENT YUMA LLC	720 E 22ND ST STE A	YUMA AZ 85365
NORTH VALLEY DEVELOPMENT YUMA LLC	720 E 22ND ST STE A	YUMA AZ 85365
RAEL JIMMY JR	2483 S DANETTE WAY	YUMA AZ 85365
RIOS PAUL & ANN	9681 S OBSIDIAN AVE	YUMA AZ 85365
SCHEFFER SHELDON & KRISTINA	11278 E 24TH PL	YUMA AZ 85365
SCHUTTE STEVEN D & SHANNON JT	9125 E 22ND LN	YUMA AZ 85364
SMITH QUINCY K & KYLA S CPWROS	PO BOX 4335	YUMA AZ 85366
SOTO HERMES RIOS & ELVIA L	7533 E 26TH PL	YUMA AZ 85365
UNION PACIFIC RAILROAD CO	1400 DOUGLAS ST STOP 1640	OMAHA NE 68179
UNION PACIFIC RAILROAD CO	1400 DOUGLAS ST STOP 1640	OMAHA NE 68179
USA	7341 E 30TH ST STE A	YUMA AZ 85365
VELASCO JOSE J	PO BOX 342	GADSEN AZ 85336
YUMA CITY OF	ONE CITY PLAZA	YUMA AZ 85364
ZAVALA JOEL V & ELIZABETH G JT	2499 S DANETTE WAY	YUMA AZ 85365

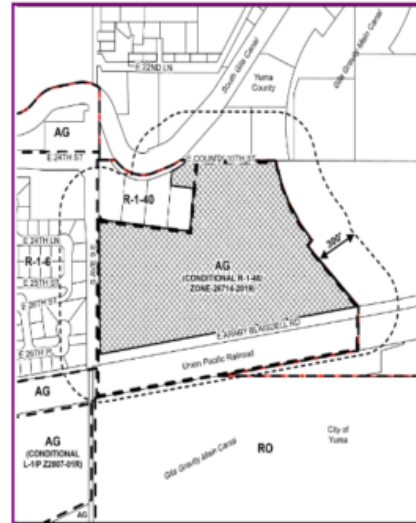
ATTACHMENT H NEIGHBOR MAILING

This is a request by Dahl, Robins & Associates, on behalf of North Valley Development, Yuma, LLC, to rezone approximately 33.38 acres from the Agriculture (AG) District to the Low Density Residential (R-1-6) District, for the property located near the southeast corner of Avenue 9E and 24th Street, Yuma, AZ.

**MEETING DATE,
TIME & LOCATION
FOR CASE #
ZONE-43589-2025**

NEIGHBORHOOD MEETING
2/12/2025 @ 5PM
ON-SITE

PUBLIC HEARING
3/24/2025 @ 4:30pm
City Hall Council Chambers
One City Plaza, Yuma, AZ



Because you are a neighbor within 300' of the South East Corner Avenue 9E & 24th Street, Yuma, AZ, you are invited to attend these meetings to voice your comments. If you have questions or wish to submit written comments, please contact Amelia Domby by phone at (928) 373-5000 ext. 3034 or by email at Amelia.Domby@YumaAz.gov

ATTACHMENT I
AERIAL PHOTO

