

**BEFORE THE BOARD OF ZONING ADJUSTMENT
OF THE DISTRICT OF COLUMBIA**

Application of The Heritage Foundation
ANC 6C

BZA Application No.
Hearing Date:

APPLICATION STATEMENT OF THE APPLICANT

This is the application of The Heritage Foundation ("**Heritage**" or "**Applicant**") for variance and special exception relief to allow a multi-faceted commercial and residential with below-grade parking project. The property that is the subject of this application is 208, 214 & 236 Massachusetts Avenue, NE and 426-430 3rd Street, NE (Square 755, Lots 3, 26, 36, 836, 838, & 849) (the "**Property**").¹ The Property is included in both the CAP/CHC/C-2-A and CAP/R-4 Zone Districts. A Surveyor's plat is attached as Exhibit C, and a portion of the District of Columbia Zoning Map is attached as Exhibit D.

I. NATURE OF RELIEF SOUGHT

The Applicant requests that the Board of Zoning Adjustment ("**BZA**" or "**Board**") approve the following areas of relief:

1. A variance from Section 771 (maximum FAR). The maximum permitted commercial FAR is 2.5. The proposed project will convert the existing mixed-use office/residential building at 208 Massachusetts Avenue to all commercial use in order to facilitate the conversion of an all-commercial building (236 Massachusetts) to residential use.
2. A variance from Section 2001.3 (restriction on expanding a nonconformity in a structure devoted to a conforming use). The existing buildings at both 208 and 214 Massachusetts Avenue are nonconforming as to FAR. With the proposed project, both buildings will slightly increase in FAR.

¹ The Property includes a small triangular piece of Lot 839 that the Applicant has continuously used for many years.

3. A variance from Section 2303.1(b) (vehicles over lot lines in a parking lot). The requirements for the special exception for accessory parking under Section 214 require compliance with the parking lot provisions in Section 2303. Section 2303.1(b) requires that no vehicle or part of any vehicle projects over any lot line. Several lot lines will cross over the accessory parking area and some of the parking spaces.
4. A variance from Section 1203.2(b) (roof structure height). The maximum permitted height of a roof structure in the CAP Overlay is 10 feet. The existing nonconforming roof structure for 236 Massachusetts is 11 feet tall, and its footprint will be expanded. The expanded portion will also have a height of 11 feet.
5. A special exception under Section 214 (accessory parking). The project will include a parking area accessory to 208 and 214 Massachusetts Avenue and located almost entirely in the R-4 zone.

II. JURISDICTION OF THE BOARD

The Board has jurisdiction to grant the relief requested pursuant to Sections 3103.1 and 3104.1 of the Zoning Regulations (11 DCMR §§ 3103.1 & 3104.1).

III. DESCRIPTION OF PROPERTY AND SURROUNDING AREA

The Property is located in the Stanton Park neighborhood of Ward 6. It is also included in the Capitol Hill Historic District. The Property is large, split-zoned, irregularly-shaped, and contains approximately 43,693 square feet of land area. The Property occupies a large section of Square 755. 208 and 214 Massachusetts Avenue stand on the north side of Massachusetts Avenue between 2nd and 3rd Streets. 208 Massachusetts is bounded to the west and north by a 10-foot public alley. 214 Massachusetts is directly east of 208 Massachusetts, and it is bounded to the north by a

surface parking area and a small retail building (excluded from this application) to the east. At the corner of 3rd and Massachusetts, 236 Massachusetts is bounded by the small retail building to the west and an apartment house (also excluded from this application) to its north. The 3rd Street properties are bounded to the north by a small apartment house and townhouses, to the south by the surface parking area for 214 Massachusetts, to the west by 208 Massachusetts and the public alley, and to the east by 3rd Street.

The Property is improved with four buildings and a surface parking area. The building at 208 Massachusetts is an eight-story building containing a mix of residential and office uses. The residential use is for student intern housing administered by Heritage, and the offices are for Heritage. The eight story building at 214 Massachusetts Avenue is fully occupied by Heritage offices. The building at 236 Massachusetts Avenue is a six-story building, constructed as an apartment house, containing office and retail uses. Although 236 Massachusetts is nonconforming as to commercial FAR, the office uses are grandfathered with valid Certificates of Occupancy. See the chart attached as Exhibit E for a depiction of the gross floor area and FAR of each building.

At the rear of 214 Massachusetts Avenue is a paved surface parking area. The parking area extends to the north and east to 3rd Street. The parking area abuts the area south of 426 and 428 3rd Street. The building at 428 3rd Street is a small 8-unit vacant apartment building that does not contribute to the historic district and will be razed for the proposed project.

As the Surveyor's Plat and site plan illustrate, the Property is oddly shaped, with a significant change in grade at the alley. The alley is approximately nine feet lower than the rear of 214 Massachusetts. The Property is also split-zoned, with all of the 3rd Street properties and a portion of the parking area (on the lot of 214 Massachusetts) in the CAP/R-4 zone. The remainder of the Property, fronting on Massachusetts Avenue, is zoned CAP/CHC/C-2-A. The building at 208 Massachusetts is irregularly shaped and is connected to 214 Massachusetts. Finally, the Property is

not contiguous, with 236 Massachusetts being separated from the rest of the Property by a small retail building to its west and a small apartment building to its north.

The surrounding area is predominantly moderate-density residential to the east and north, which is dominated by row dwellings. Office buildings with ground floor retail dominate Massachusetts Avenue across the street, and a gas station and office buildings line the block of 2nd Street to the west. Slightly further to the west is a large federal building, and to the southwest is a large surface parking area for the U.S. Capitol.

Heritage has been located in Square 755 since 1983. Since that time, Heritage has been acknowledged to be a good neighbor, a good steward of its buildings, and a friend to the community. It has improved its buildings and the adjacent public space, adding significant landscaping and mature trees to the enhancement of the block. The proposed project will not be for the benefit of a new of a new organization moving to the neighborhood; rather, it will be for an important and appreciated neighbor. Only nominally new commercial space will be constructed, but it will be for Heritage. This project will allow Heritage to maintain its presence and to help improve and restore the neighborhood, correcting what happened (the 428 3rd Street apartment house and the rear surface parking lot) before the historic preservation processes were in place.

IV. THE PROPOSED PROJECT

The proposed project will include office, residential, and parking elements. First, the building at 208 Massachusetts will be converted from mixed office and residential uses to all office use. Also, the office use in 236 Massachusetts will be converted to all residential use to accommodate the student intern housing that will be relocated from 208 Massachusetts. Effectively, the office use in 236 Massachusetts (30,319 square feet) will be swapped with the residential use in 208 Massachusetts (28,200 square feet), but the ground floor retail at 236 Massachusetts will remain. The goal is to have each building be one use, either commercial or

residential (with ground floor retail), with no net increase in commercial use for the entire Property. However, because of the differing sizes of the two buildings, the swap will not be exactly even, and there will be a small net increase of 949 square feet of commercial use. The resulting commercial FAR for 208 Massachusetts will be 5.42, and the resulting residential FAR for 236 Massachusetts will be 4.76.

Second, the building at 428 3rd Street will be razed, and the entire 3rd Street frontage of the Property, including most of the existing surface parking lot, will be redeveloped with six single-family townhouses more appropriate for the street. These townhouses will fully conform to the Zoning Regulations.

Third, the area directly behind 214 Massachusetts Avenue and beneath the new townhouses will be developed with an underground accessory parking area. This parking area will include 3.5 levels of underground parking accessed from 3rd Street. The accessory parking area will include 105 spaces, of which 99 will be accessory to 208 and 214 Massachusetts and six will be for the townhouses. Each space for the townhouses will be below the townhouse to which it belongs.

Fourth, both 208 and 214 Massachusetts will be enlarged very slightly. 208 Massachusetts will be enlarged by 470 square feet to accommodate an enclosed service corridor and exist stairway. The area for the corridor currently exists inside the courtyard of the building, but it will be enclosed. With the grade change from the accessory parking area, the new enclosed corridor will slightly add 470 square feet of density chargeable to FAR, so the resulting FAR of 208 Massachusetts will be 5.42. Also, 214 Massachusetts will receive a slight addition of 800 square feet at its rear. The rear addition will accommodate a required egress stairway from the underground accessory parking area.

Fifth, 236 Massachusetts will be renovated to accommodate all of Heritage's student intern housing. The building will be modernized and brought current to applicable Building Codes. The existing penthouse is nonconforming with a height of 11 feet. As part of the renovation, the

existing penthouse will be horizontally expanded to accommodate mechanical equipment. The existing penthouse is large enough for only the elevator machinery and a small stairway. The expanded penthouse will comply with all required setbacks, but it will continue to have a nonconforming height of 11 feet.

Photos of the Property and plans of the proposed project are included in the separately enclosed Appendix.

V. THE APPLICATION MEETS THE REQUIREMENTS FOR VARIANCE RELIEF

The burden of proof for area variance relief is well established. The Applicant must demonstrate that (1) the property is affected by an exceptional or extraordinary situation or condition, that (2) the strict application of the Zoning Regulations will result in a practical difficulty to the Applicant, and that (3) the granting of the variance will not cause substantial detriment to the public good nor substantially impair the intent, purpose or integrity of the zone plan. Palmer v. D.C. Bd. of Zoning Adj., 287 A.2d 535, 541 (D.C. 1972). As outlined below, the Applicant demonstrates that the Property meets the three-part test for area variance relief.

A. The Property is Affected by an Exceptional Condition

The Court of Appeals held in Clerics of St. Viator v. D.C. Bd. of Zoning Adj., 320 A. 2d. 291 (D.C. 1974) that the exceptional situation or condition standard goes to the property, not just the land. The Court in Monaco v. D.C. Bd. of Zoning Adj., 407 A.2d 1091 (D.C. 1979) went even further and noted that the exceptional situation or condition is not limited to the land or the physical improvements on the land, but applies also to the history of the property. In Monaco, the Court accepted the past zoning history of the property as evidence of uniqueness. Furthermore, the Court of Appeals held in Gilmartin v. D.C. Board of Zoning Adjustment, 579 A.2d 1164, 1167 (D.C. 1990), that it is not necessary that the exceptional situation or condition arise from a single situation

or condition on the property. Rather, it may arise from a “confluence of factors.” *Id.* Finally, it is not necessary that the Property be unreservedly unique. Rather, applicants must prove that a property is affected by a condition that is unique to the property and not related to general conditions in the neighborhood.

In this case, the Property is unique because of a confluence of many factors. Collectively, the Property is controlled and operated by one entity with many functions (Heritage), it is not entirely contiguous, it is split-zoned CAP/CHC/C-2-A and CAP/R-4, it is irregularly shaped, and it is in a historic district. With respect to the individual buildings, they are also unique. Both 208 and 236 Massachusetts are contributing buildings to the historic district, and both are nonconforming as to FAR and height. 208 Massachusetts is also oddly shaped with the rear portion of the building jutting to the east at an unusual angle. 236 Massachusetts is irregularly shaped in a somewhat triangular manner and does not have a rear yard. In addition, 214 is irregularly shaped and nonconforming as to FAR and height.

B. Strict Application of the Zoning Regulations would Result in a Practical Difficulty

The appropriate test is whether the strict application of the zoning regulations results in a “practical difficulty.” In reviewing the standard for practical difficulty, the D.C. Court of Appeals stated in Palmer v. Board of Zoning Adjustment, 287 A.2d 535, 542 (D.C. App. 1972), that “[g]enerally it must be shown that compliance with the area restriction would be unnecessarily burdensome. [Footnote omitted.] The nature and extent of the burden which will warrant an area variance is best left to the facts and circumstances of each particular case.” In area variances, applicants must satisfy only “the lower ‘practical difficulty’ standards.” Tyler v. D.C. Bd. of Zoning Adj., 606 A.2d 1362, 1365 (D.C. 1992) (citing Gilmartin v. Bd. of Zoning Adj., 579 A.2d 1164, 1167 (D.C. 1990)). Finally, it is well settled that the BZA may consider “a wide range of

factors in determining whether there is an ‘unnecessary burden’ or ‘practical difficulty’ . . . Increased expense and inconvenience to applicant for a variance are among the factors for BZA's consideration.” Gilmartin, 579 A.2d at 1171 (citing Barbour v. D.C. Bd. of Zoning Adj., 358 A.2d 326, 327 (D.C. 1976)); see also Tyler v. D.C. Bd. of Zoning Adj., 606 A.2d 1362, 1367 (D.C. 1992). Other factors to be considered by the BZA include: “the severity of the variance(s) requested”; “the weight of the burden of strict compliance”; and “the effect the proposed variance(s) would have on the overall zone plan.” Gilmartin, 579 A.2d at 1171. Thus, to demonstrate practical difficulty, an applicant must show that strict compliance with the regulations is *burdensome*, not impossible. Indeed, the practical difficulty is not about need; it is about Heritage being able to use its property most efficiently as a result of its unique conditions.

In this case, the proposed project meets the practical difficulty standard with respect to the four variances requested. First, regarding the variance to increase the commercial FAR for 208 Massachusetts (to effectuate the residential swap with 236 Massachusetts), Heritage now faces and would continue to face a practical difficulty in its operation of both office space and intern housing. The inefficient operation of its facilities at 208 Massachusetts would be compounded if that building must remain mixed-use and 236 Massachusetts must remain as office space. 208 and 214 Massachusetts are connected, and the main office operations for The Heritage Foundation are operated out of them both as one facility. As a large nonconforming building in a commercial zone adjacent to a large fully commercial building, 208 Massachusetts will function far more efficiently as an all-commercial building. The presence of intern housing amidst office use creates an inefficient operation disconnected from the surrounding commercial uses along Massachusetts Avenue. The HVAC system for all of 208 Massachusetts must run 24 hours per day when only the intern housing is occupied outside business hours. With both 208 and 214 Massachusetts being operated as one office, there will be single point access control for the connected 208 and 214

Massachusetts – rather than the existing two access controls for both if 208/214 and 236 Massachusetts – and there would be no need to exit the buildings to go to other office space at 236 Massachusetts.

The operation of 236 Massachusetts as office space is even more inefficient than 208 Massachusetts, and it is better suited for residential use. This building was originally designed as an apartment house, and over time it was converted to office use without updating the interior for that new use by, for example, removing the bathrooms containing tubs. The result is that the office space is not very functional and not well suited to modern office demands. However, because the office use is grandfathered, there is no incentive to abandon it if it cannot be retained elsewhere. Heritage would face considerable operational burdens by having an increased office presence in 236 Massachusetts while maintaining intern housing in 208 Massachusetts. It makes much more sense from an operational and planning perspective to locate the student intern housing in a building that was designed for residential use (236 Massachusetts) and to locate a single-user office in a building that is fully devoted to office use (208/214 Massachusetts).

Second, with respect to the variance to increase the nonconforming FAR for both 208 and 214 Massachusetts, The Heritage Foundation would face a considerable burden by having to comply with the Zoning Regulations. 208 Massachusetts already has a service corridor at its rear, but it must be enclosed to create a watertight structure that will prevent basement flooding, to allow better operating efficiencies, to control light and noise emanating to neighboring properties, and to improve security. As a result of the grade change, some of the corridor will be above grade and chargeable to FAR. However, the increase in FAR is a miniscule 0.05. Also, the underground accessory parking area at the rear of 214 Massachusetts must have at least two egress stairs to be Code compliant. One of these means of egress will be through a small one-story addition at the rear

of 214 Massachusetts so that the parking may be accessed directly from 214 Massachusetts. Without the ability to construct this small addition to 214 Massachusetts, the Applicant would face a considerable burden in designing a parking facility that accommodates the requisite egress stairs. This addition to 214 Massachusetts will increase its effective FAR by a nominal 0.05.²

Third, with respect to the variance from the requirement that lot lines do not cross parking spaces (Section 2303.1(b)), the Applicant would face a considerable burden in complying with this regulation. The parking spaces will be underground and will serve six townhouses and two buildings (208 and 214 Massachusetts Avenue). To design the parking area so that none of the lot lines cross over any of the underground accessory parking spaces would be nearly impossible. The design of the parking is already less efficient than it would otherwise be on a more regular site. Because of the odd configuration of the site, if the parking facility were to comply with the regulation, then the resulting layout of the parking would be so irregular and inefficient that it would not be practical to build it.

Finally, regarding the variance from roof structure height, Heritage would face a significant burden if it were required to comply with the roof structure height limitation. The roof structure height limit of 10 feet in the CAP Overlay is significantly lower than the 18.5 feet limit otherwise allowed. In this case, the roof structure must be expanded to accommodate mechanical equipment. The existing roof structure is far too small to contain anything but the elevator and a small access stairway. Also, because the building occupies most of the lot and has no rear yard, there is nowhere to place mechanical equipment on the ground. Therefore, the only feasible location is on the roof. The Zoning Regulations prohibit a roof structure comprised of walls of differing heights, so the nonconforming 11-foot height of the structure must be maintained. Furthermore, from a historic

² The FAR will actually increase to 4.91, but that is because of a reconfiguration of the lot. Only a tiny amount of density will be added to the building, so this is what the FAR would be but for the lot reconfiguration.

preservation perspective, a uniform roof structure height is significantly preferred over one that varies. Accordingly, because of the unusual shape and nonconforming nature of the building, Heritage would face a considerable burden by constructing a roof structure addition that complies with the Zoning Regulations.

C. Relief can be Granted without Substantial Detriment to the Public Good and without Impairing the Intent, Purpose, and Integrity of the Zone Plan

Granting all of the requested relief will not harm the Zone Plan. The Applicant has designed the project to minimize any adverse impacts on neighboring properties. The surrounding properties will experience negligible, if any, adverse impacts as a result of the requested relief.

First, with respect to the “use swap” between 208 and 236 Massachusetts Avenue, the neighborhood will benefit. With the new townhouses, the length of the west side of the 3rd Street block will be returned to entirely residential use once 236 Massachusetts becomes residential again.³ This will add harmony and consistency to the surrounding residential neighborhood. In addition, there will not be any new impacts from the commercial use. But for the nominal increase because of the difference in building sizes and to accommodate necessary functions, there will not be any “new” commercial use on the Property. After the swap, the commercial uses will be concentrated on Massachusetts Avenue away from the residential neighborhood, thereby resulting in a decrease in the impacts from the existing office uses spread all the way to 3rd Street.

Second, with respect to increasing the nonconforming FAR for 208 and 214 Massachusetts, there will be no adverse impacts on the surrounding neighborhood. As explained above, the nominal increases in FAR will not be functional commercial space. For 208 Massachusetts, it will be an enclosed service passageway and egress stairway in an internal courtyard that already exists,

³ The ground floor retail in 236 Massachusetts will remain, which the community supports.

and for 214 Massachusetts, it will be a stairway egress for the underground parking. These minor expansions will not allow for an increase in employees or visitors, so there will not be any adverse impact.

Third, there will not be any adverse impact by allowing lot lines to cross underground parking spaces. Clearly, the intent of this regulation is to prevent parking spaces that obstruct development on lots or passage between lots. That is not the case here. The parking spaces are all underground and do not burden the properties above them in any manner; in fact, the underground parking is an asset to the properties above it. The Applicant will have the appropriate easements and covenants to ensure that all of the spaces will be accessible.

Finally, there will not be any adverse impact by maintaining the 11-foot roof structure height for the roof structure expansion. The uniformity of the height will comply with the Zoning Regulations, and it will be preferable from a historic preservation standpoint. Also, the expanded roof structure will not have an adverse impact on neighboring light and air since it will comply with all required setbacks. Aesthetically, there will be no impact since a nonconforming 11-foot roof structure already exists, and expanding it horizontally will not exacerbate this condition.

Accordingly, because the requested variance relief will not have any adverse impact, it will not impair the intent, purpose, and integrity of the Zone Plan.

VI. THE APPLICATION MEETS THE REQUIREMENTS FOR SPECIAL EXCEPTION RELIEF FOR ACCESSORY PARKING

Sections 214.2 – 214.7 set forth the special exception criteria that the application must satisfy for the Board to approve accessory parking spaces. As described below, this project satisfies these requirements.

- A. Accessory parking spaces shall be in an open area or in an underground garage no portion of which, except for access, shall extend above the level of the adjacent finished grade (Section 214.2).*

As described above, the parking spaces shall be entirely underground. The only portion of the parking facility that will be above grade will be the two required egress stairways, and the northern one will include an exhaust vent.

- B. Accessory parking spaces shall be located in their entirety within 200 feet of the area to which they are accessory (Section 214.3).*

The parking spaces will be accessory to 208 and 214 Massachusetts Avenue. No parking space will be located more than approximately 150 feet from either building.

- C. Accessory parking spaces shall be contiguous to or separated only by an alley from the use to which they are accessory (Section 214.4).*

All of the accessory parking spaces will be contiguous to either 208 or 214 Massachusetts Avenue. Most of the spaces will be on the lot of 214 Massachusetts, which will make them contiguous to 208 Massachusetts. Some of the accessory parking spaces will extend onto the lots of the townhouses (underground), but they will be contiguous to 214 Massachusetts.

- D. All provisions of chapter 23 of this title regulating parking lots shall be complied with, except that the Board may in an appropriate case under § 2303.3 modify or waive the conditions specified in § 2303.2 where compliance would serve no useful purpose (Section 214.5).*

The parking area will comply with all provisions of Section 2303.1 except for subsection (b), as discussed above in the variance relief request. Exterior lighting will be unnecessary since the parking spaces will be entirely underground. The area above the parking area will be landscaped to the extent possible, but none of the parking spaces will be visible from outside, so excessive landscaping to shield nearby properties from the parking area is unnecessary. Furthermore, the screening requirements in Section 2303.2 are inapplicable since the parking spaces will be entirely

underground and invisible from the outside, so the Applicant requests that the Board waive this provision. Because the parking spaces will be entirely underground and will provide additional parking in a neighborhood already burdened with a shortage of on-street parking, the proposed parking facility will not have any adverse impacts on adjacent residential property. In addition, because the parking facility will not adversely impact residential properties, no additional treatment of the premises is necessary.

E. It shall be deemed economically impracticable or unsafe to locate accessory parking spaces within the principal building or on the same lot on which the building or use is permitted because of (a) strip zoning or shallow depth and (b) restricted size of lot caused by adverse adjoining ownership or substantial improvements adjoining or on the lot (Section 214.6).

As the zoning map illustrates, the zone line cuts off the majority of the rear of the lot of 214 Massachusetts, leaving almost no room where the parking could be located within the commercial zone. Similarly, the zone line hugs the rear of 208 Massachusetts, leaving no room for locating parking within the commercial zone. In addition, the building at 208 Massachusetts occupies nearly all its lot, leaving no space on the lot where parking could be located. And because 208 Massachusetts is a historic building, alterations to it, such as changes to add parking beneath the building, would require approval. Even if such approval could be obtained, the project would be prohibitively expensive. Furthermore, the proposal removes a nonconforming parking lot from the R-4 zone.

F. Accessory parking spaces shall be so located, and facilities in relation to the parking lot shall be so designed, that they are not likely to become objectionable to adjoining or nearby property because of noise, traffic, or other objectionable conditions (Section 214.7).

By being located entirely underground, the accessory parking spaces are not likely to become objectionable to adjoining or nearby properties. The underground location with an automatic door at its entrance will eliminate any noise that cars may generate. Also, traffic will not increase. The

cars that will park in this facility already drive to the neighborhood; they just park on the street and in other locations. This parking will eliminate the pressure to use on-street parking and will not generate any new traffic. The underground location will minimize, if not eliminate, any possible objectionable conditions, such as lighting and undesirable visual impacts, that may otherwise result from an above-ground facility. The Applicant designed the modest entrance to the parking so that it would be associated with the townhouses and would not give pedestrians or residents any sense of the size of the underground facility.

G. The Requested Relief will be in Harmony with the General Purpose and Intent of the Zoning Regulations and Zoning Maps and will not Tend to Affect Adversely the Use of Neighboring Property

The accessory parking will not adversely affect the use of neighboring property. At great expense, the Applicant will locate all of the parking underground in order to minimize any possibility of adverse impacts. Since the project will satisfy the requirements for special exception relief set forth in Sections 214.2 – 214.7, the requested relief will be in harmony with the purpose and intent of the Zoning Regulations and Zoning Map.

VII. EXHIBITS & APPENDIX

EXHIBIT A	Application Form, Self-Certification Form, and Letter of Authorization
EXHIBIT B	Applicant's Statement in Support of Requested Relief
EXHIBIT C	Surveyor's Plat
EXHIBIT D	Excerpt of Zoning Map
EXHIBIT E	Chart of Building Gross Floor Area and FAR
EXHIBIT F	Property Owners List
APPENDIX	Architectural Plans and Site Plan, Including Photos of Property

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VIII. CONCLUSION

Based on the foregoing analysis and conclusions, the Applicant respectfully requests that the Board grant the variance and special exception relief requested.

Respectfully submitted,
GOULSTON & STORRS, P.C.


Allison C. Prince


Cary R. Kadlec