

II.

Jurisdiction of the Board

The Board has jurisdiction to grant the requested relief pursuant to D.C. Code § 6-641.07 (2001 ed.) and 11 DCMR §§ 3103.2.

III.

Background

A. Site and Vicinity Characteristics

1. The Property

The subject property is located in the R-3 District, as shown on the portion of the Zoning Map attached as Exhibit B. The site comprises Lot 63 in Square 1204, which is bounded by 35th Street, N.W. on the west, 34th Street NW on the east, single-family and multi-family dwellings along Prospect Street to the north, and commercial buildings to the south of the Property, which front on M Street, NW, in Georgetown. To historians, Halcyon House is well known as the “Benjamin Stoddert House,” and is located within the Old Georgetown Historic District and individually designated as an historic landmark on both the D.C. Inventory of Historic Sites and the National Register of Historic Places (“National Register”).

In 1787, the first secretary of the Navy, Benjamin Stoddert, completed construction on a red-brick Georgian mansion facing the Potomac River. After Stoddert’s death in 1813, and until 1900, the house and property remained virtually as Stoddert built it. But in 1900 the property was sold to an eccentric named Albert Clemons, who also happened to be Mark Twain’s nephew. During Clemons’ 40-year ownership, the house was dramatically altered. The National Register describes Clemons’ additions as those that “enlarged the structure substantially and disfigured the north front and side wings with an amazing assemblage of architectural details from demolished buildings.” Upon Clemons’ death, Halcyon House had been extended to, and

was entered from, the ground floor on Prospect Street, which was formerly the basement. The north extension included a ballroom on the first floor, apartment extension on the west side of the house, and a large library on the second level that resembles a chapel, largely due to Clemens' use of trim from a demolished church. To the west, Clemens constructed apartments, which were remodeled by a subsequent owner.

In 1966, the property was sold to Edmund Dreyfuss, and the Property remained in the Dreyfuss family until 2012. During the Dreyfuss ownership, a cavernous, 9,000 square foot ("SF") sculpture studio and exhibit hall was built underneath the original structure. On the "lower" south side of the Property, adjacent to the studio, the former owner constructed a wide driveway area for guests and service personnel, and which can accommodate up to 24 vehicles (stacked). The "upper" south side of the Property contains landscaped garden areas and a pool, all of which overlook the Key Bridge and the Rosslyn skyline. See Exhibit C.

When the original house, extensions, apartments, and studio are combined, the main house structure totals 23,400 SF. The application also includes a 2,900 SF townhouse, which adjoins a party wall and also is situated on Lot 814. See Exhibit D. Including the townhouse, the combined improvements total 26,000 SF.

B The Vicinity

Halcyon House is situated within the southwest quadrant of Georgetown. Specifically, Square 1204 is generally bounded by Prospect Street on the north, 34th Street on the east, commercial buildings on the south and 35th Street on the west in Northwest D.C. (see Exhibit E). Square 814 is split-zoned between R-3 and C-2-A. In fact, the entire block to the south of Halcyon House is zoned to the C-2-A district (see Exhibit B). Halcyon House and all of the

surrounding properties to the north of its southern boundary are designated for moderate-density residential land uses on the Future Land Use Map of the Comprehensive Plan; properties in the block fronting M Street are designated for low intensity commercial. See Exhibit G.

Prospect Street is a well-traveled pedestrian route for students because of its location between Georgetown University and Wisconsin Avenue. Travel on 34th Street NW is one-way, in a southerly direction, toward M Street and Key Bridge. Peak traffic hours at this intersection are 7:45 am to 8:45 am and 5:00 pm to 6:00 pm (peak hour information based on the traffic study prepared by Gorove/Slade Associates for Georgetown University 2011-2020 Campus Plan, dated October 21, 2011, and submitted to the District Department of Transportation (“DDOT”)).

B. Halcyon House History

Halcyon House’s history dates back to the late 18th century and a Revolutionary War hero by the name of Benjamin Stoddert. After serving as secretary to the Revolutionary War Board in Philadelphia from 1779 to 1781, Stoddert married Rebecca Lowndes. In 1787, after becoming a partner in Forrest, Stoddert and Murdock, a prosperous Georgetown shipping firm, Stoddert purchased lots 16 and 17 in Georgetown, Maryland, at the corner of Prospect and Frederick Streets (later 34th Street). Halcyon House was constructed on lot 17 and the gardens extended onto lot 16. Nine years later, Stoddert continued to prosper as a businessman, being an incorporator and president of the Bank of Columbia, founded to help establish the District of Columbia. Among his friends and associates were Presidents Washington, Adams and Jefferson, Light Horse Harry Lee, Francis Scott Key, and Dolly Madison. During the late 1790’s, he began to acquire extensive real estate holdings in Georgetown and Washington, including the western

IV.
Description and Operation of the S&R Foundation

A. Description of Foundation (Applicant)

Doctors Kuno and Ueno established the Foundation in 2000 to encourage and stimulate scientific research and artistic endeavors among gifted young individuals, with an emphasis on individuals who had, or could, contribute to a greater understanding between the United States and their native Japan. While the Foundation has always placed great value on educational purposes, initially the purposes of the Foundation were focused on the fields of the arts, cultural understanding, as well as medical and pharmaceutical research. But in 2011, after witnessing, and in some cases, experiencing, the world-wide effects of earthquakes, tsunamis and hurricanes, the Foundation's Board of Directors expanded the Foundation's purposes to include the exchange of knowledge regarding the response to, and management of, such catastrophes. The more specific purposes of the Foundation, as listed in the Articles of Incorporation, as amended, are:

- (1) To operate exclusively for charitable, scientific, literary or educational purposes;
- (2) To provide scholarships and financial support to medical students and students pursuing health care service related degrees;
- (3) To provide grants for research in the medical field and pharmaceutical field;
- (4) To encourage and support young artists with an emphasis on young artists whose activities take place in both the United States and Japan or whose specialties contribute to mutual understanding between the two countries;
- (5) To enhance and promote cultural exchange between the United States and Japan, with the intention of fostering mutual understanding;
- (6) To encourage the exchange of knowledge, information, and ideas between the United States, Japan, and countries in the Asia/Oceania Region regarding

emergency management of hazard risks that cause disasters or catastrophes, whether the hazard risks are naturally occurring or human-made;

(7) To provide high quality, independent research, innovation, and practical recommendations for emergency management of hazard risks;

(8) To advance global resilience by disseminating to countries and non-governmental organizations best practices for structural and nonstructural measures to prepare for, protect against, respond to, recover from, and mitigate all hazard risks

A copy of the Articles of Incorporation and Amendment are attached hereto and incorporated herein as Exhibit H.

The Foundation has a growing track-record of success. Since 2001 the Foundation has funded two on-going awards, one in the field of fine arts and the other in health care-related sciences. Over the past year or so, the Foundation has categorized its missions into four distinct programs:

1. *Award Program*, which targets the arts and sciences. For the arts, the S&R Washington Award is given annually to one or more talented young artists in the fields of music, drama, dance, photography or film. Since the Foundation was organized, 39 artists have benefitted from the grants, with several having performed at the Kennedy Center, Carnegie Hall, and Strathmore Hall. The 2012 winners include a dancer, composer, pianist and violist

For the sciences, the Ryuji Ueno Award for Ion Channels or Barrier Function Research, established in partnership with the American Physiological Society, is intended to support targeted medical and pharmaceutical research in ion channels or epithelial barrier function, and is generally given to the institution in which the research is performed. The Ryuji Ueno Award for 2013 was presented to Oleh Pochynyuk, a medical researcher at the University of Texas Health

Science Center. Past winners of this award included the University of Chicago, University of Maryland School of Medicine, the Medical College of Wisconsin, Emory University, Johns Hopkins University and the University of California at Los Angeles.

2. *Showcase Program* features the highly successful Overtures Concert Series. Beginning the summer of 2012, and continuing, pursuant to the Board of Zoning Adjustment's ("BZA") approval of the special exception for Evermay, the Foundation has hosted a performance series known as "Overtures," with performances primarily at Evermay and a few at Kennedy Center in conjunction with the National Cherry Blossom Festival. Performers include past S&R Award winners as well as other artists, including a series in collaboration with the DC Jazz Festival. Since the BZA approved the Evermay application, Overtures has established the summer, holiday, and spring performance series featuring internationally renowned artists in an intimate, beautiful and unique setting.

3. *Fellows Program*, which provides upper-level undergraduate and graduate students exposure to corporate leaders through the Kyoto-DC Global Career Leadership Program. Participants are upper level and graduate students at Kyoto University, Dr Kuno's alma mater, who visit, among other places, the World Bank, NASA, and NIH, and who receive training and instruction from academics, researchers, and relevant specialists. In addition, discussion sessions are scheduled with current students from universities in the Washington, DC area. The goal of the program is to cultivate global competency and leadership skills by observing and understanding the cultures of a variety of work environments, as well as by engaging in discussions with university students of different cultural backgrounds.

4. *Social Investment Program*, focusing on the challenges of the 21st century, ranging from the perspectives of disaster response to the changing environment of our world.

Specifically, the Social Investment Program is manifested through the International Institute of Global Resilience (“IIGR”) and Illuminate programs, which are the focus of this application. The Foundation founded IIGR in 2012, followed by Illuminate in 2013. It is IIGR and Illuminate that the Foundation wishes to headquarter at Halcyon House. Together, the two programs will enable Halcyon House to maintain a residential presence in Georgetown consistent with the residential use, while aspiring to achieve a meaningful center for innovation and resilience.

B. Operations of the Foundation (Applicant)

Pursuant to approval of the special exception, the Foundation intends to locate the offices for IIGR and Illuminate at Halcyon House, conduct IIGR and Illuminate-associated meetings, seminars and presentations, and hold other Foundation events there, as well. The operations of the Foundation include a broad spectrum of events, ranging from research to incubation, seminars to presentations, and concerts to exhibits. For each component, the Foundation or its consultants reviewed potential impacts and engaged consultants as appropriate to analyze perceived impacts and to recommend mitigation measures.

1. Non-Profit Offices

The non-profit offices will be located on the main level of the structure, in rooms that are already suitable for such use. Currently IIGR is managed by Dr. Maki Fukami, and is assisted by three staff members, only one of whom will work regularly from the Property. The current layout is capable of providing office space for no less than 12 employees. Consistent with the ten-year growth plan, the proposed Special Exception Conditions (“Conditions”) permit a total of 12 employees. See Exhibit I.

Regular office hours will be Monday through Friday, 7 a.m. to 8 p.m. These hours will provide employees with flexible arrival and departure times. There will be occasional weekend hours, generally during weekend events associated with IIGR seminars or the occasional associated Foundation event. Parking in the rear parking court adjacent to the studio is adequate for 18 cars, which will be more than sufficient for any employees who drive to work. Two additional spaces are available in the townhouse driveway, as well.

2. International Institute for Global Resilience

The Foundation, through the auspices of IIGR, is committed to providing a platform for emergency management leaders to elevate the field, and improve global resilience so that the impacts from disaster are diminished upon all populations. In furtherance of its lofty goals, the IIGR team continually works to design research and educational initiatives programs in four targeted areas:

- sharing emergency management knowledge among different jurisdictions, countries, and professions;
- incorporating new tools and ideas to improve emergency response worldwide;
- improving communication and coordination among emergency responders; and,
- promoting the use of common languages and systems in emergency management.

IIGR's targeted areas manifest themselves in one of three service areas – research, education or educational consulting. First, IIGR management provides expert, education consulting regarding emergency management and planning to a broad range of clients in both of the private and public sectors, nationally and internationally. Many, if not most, of the events associated with this prong of the IIGR program will occur at locations other than Halcyon House.

Second, the education prong includes, but is not limited to, seminars and discussions with university and post-graduate students and faculty in consultation with leading experts in the fields of government, emergency management and the corporate sector. These meetings and seminars will be small in nature, generally attended by 10-20 participants, although in time, it is anticipated that a limited number of meetings might be attended by more participants but, no more than 50. Within the education prong, IIGR leadership anticipates conducting a broad range of programs, from emergency response education sessions for its Georgetown neighbors to seminars with international neighbors. Many, if not most, participants will come from outside the Washington, DC area, and more likely, the United States. Therefore, some IIGR meeting and seminar participants will stay at Halcyon House, either in the main house, townhouse, or attached apartments.

Third, the research program assembles fellows to explore issues related to global resilience through IIGR's Residency Program. The residency program is for up to 12 weeks, during the requisite period during June, July or August, for six to eight research fellows, who will collaborate on their research while living at Halcyon House. Their research endeavors will culminate in white papers presented at an annual conference in the areas of:

- Disaster Communication/Risk Communication
- Disaster Logistics/Supply Chain Management
- Hazard Mitigation/Environmental Resource Protection

It is contemplated that IIGR seminars and meetings will run throughout the year, on a varied schedule, Monday through Sunday. As can be seen from the use chart, nearly half of the requested events at Halcyon are for IIGR. And, of the requested 40 IIGR events, 24 will be for 20 or less participants, and only 16 would be for up to 50 participants. Given the international

and educational nature of IIGR, the seminars and meetings will be small with low impact. Few, if any, participants will require parking. The IIGR conference will be a larger event but will be scheduled to occur consistent with an event over 200 guests, as shown in the Conditions, Section 6.

3. Illuminate

Simultaneously Illuminate will provide a platform for innovators and entrepreneurs akin to an incubator, where ideas can be expressed, developed and launched. This social science prong of the global resilience effort will be presented in two distinct methods. First, the Illuminate Speaker Series will provide a platform for novel, courageous thinkers to relate their forward-thinking ideas, or, to relay how their bold thinking sparked change in the world. For instance, the first Illuminate Speaker Series event featured human rights activist Somaly Mam and Ambassador Melanne Verveer. During the evening Ambassador Verveer spoke with Ms. Mam, who was sold into sex slavery at the age of 12. After enduring rapes and watching as her best friend was murdered, Ms. Mam escaped and since has dedicated her life to freeing and empowering other victims with sustainable employment. In August, the second Illuminate Speaker Series featured Patrick Dowd, a Georgetown University graduate and founder of the Millennial Trains Project. The Trains Project is a 10-day transcontinental journey intended to challenge economic invention and inspire the minds of its passengers - budding entrepreneurs and innovators belonging to the millennial generation.

As part of the Speaker Series, the discussions are maintained online for all viewers at <http://www.illuminateseries.org/>. For this reason, attendance at Illuminate Speaker Series is generally anticipated to be less than 100 persons. These presentations are shown in the

Foundation Events and will occur as described below and pursuant to the limitations set forth in the Conditions.

The second prong of Illuminate is the “Incubator”, a residency program at Halcyon House. This program is unique among incubators in that it will select only a very few, extremely promising trailblazers for which the Foundation will provide living and work quarters for up to six months, with possible extensions for an additional three month period. In this manner the Foundation can enable the innovators whose ideas have unique societal benefits to fast-track their visions by using their limited funds to seek out vital resources in Washington, DC, rather than on rent for offices and housing.

The IIGR and Illuminate Incubator schedules are contemplated as follows (Illuminate presentations are included in the Foundation event schedule below):

Type of Event	Day Range	Hour Range
IIGR Meetings/ Seminars	Monday-Sunday	9 am - 10 pm
IIGR Residency Program	Up to 12-week duration June - August	24 hours Monday - Sunday
Illuminate Incubator	Up to 9 months September - May	24 hours Monday-Sunday

As an endnote, the IIGR Residency Program and Illuminate Incubator are not intended to coincide, rather, it is intended that the Incubator program will run synonymous with an academic year, from September until the end of May.

4. Foundation Events

Foundation Events are those hosted by the Foundation and associated with the Foundation’s general missions. Illuminate presentations fall within this group of events, as do other educational conferences, concerts, art exhibits, and events hosted by the Foundation. These types of events are contemplated to occur outside of the peak traffic hours (7:45 to 8:45

a.m. and 5:00 to 6:00 pm, Tuesday - Thursday), Monday through Sunday and pursuant to the Conditions, which limit number of guests, number of events, hours for loading, and use of valet.

Spotlight Events, are few but vital to the Foundation as these are the events the Foundation will host to “spotlight” award winners, research findings and supporters. As Spotlight Events will tend to have more guests than the Illuminate and IIGR events, they will be limited to three annually. Mitigation measures for all of the events are detailed in the Conditions and in Section V. The schedule for the combined Foundation events follows:

Type of Event	Day Range	Hour Range
Foundation Events	Monday – Friday Saturday - Sunday	10am- 4 pm; 7 pm -10 pm
Spotlight Events	Saturday-Sunday	11 am-11 pm

V.

The Application Meets the Standards for Special Exception for Non-Profit Use under the Zoning Regulations

A. Nature of Relief Sought

The R-3 district permits non-profit organization use through special exception relief. In order for the Foundation to locate offices at Halcyon House, it must first seek special exception relief under section 217 of the Zoning Regulations. The Foundation meets the requirements for special exception approval under sections 217 and 3104 as detailed below.

B. Standard of Review for Variance Relief

Section 217 of the Zoning Regulations provides that the Board of Zoning Adjustment may grant special exception relief from the R-1-B regulations, subject to the following requirements:

a. 217.1: (a) *If the building is listed in the District of Columbia's Inventory of Historic Sites contained in the comprehensive statewide historic preservation survey and plan prepared pursuant to § 101(a) of the National Historic Preservation Act, approved October 15, 1966 (80 Stat. 915, as amended; 16 U.S.C. § 470a), or, if the building is located within a district, site, area, or place listed on the District of Columbia's Inventory of Historic Sites; and (b) If the gross floor area of the building in question, not including other buildings on the lot, is ten thousand square feet (10,000 ft.²) or greater.*

Halcyon House satisfies both conditions of this provision. It is listed in the D.C. Inventory of Historic Sites as an individual landmark and has a gross floor area that well exceeds 10,000 square feet.

Halcyon House's heritage is an essential element in the history of Washington, D.C. Its beginnings trace back to 1787, when Revolutionary War hero Benjamin Stoddert constructed a simple, yet strikingly beautiful Georgian mansion at the corner of Prospect and 34th Streets, NW. Stoddert was one of the incorporators, and later president, of the Bank of Columbia, a financial institution formed to help establish the District of Columbia. In 1798 Stoddert was appointed the first Secretary of the Navy and counted among his friends Presidents Washington, Adams, and Jefferson. The house was later purchased by Mark Twain's nephew, who transformed Halcyon House into the Palladian structure that exists today. Along the way Georgetown University owned the Property and used it for dormitories and renowned sculptor John Dreyfuss constructed the large studio and workroom underneath the original house. Today Halcyon House is listed as an individual historic landmark in both the National Register of Historic Places and the DC Inventory of Historic Sites.

Additionally, the gross floor area of the main building, not including other buildings on the lot, is 23,400 square feet. The adjacent townhouse, sharing a party wall with the main house, contains 2,900 square feet of floor area and a garden building contains 256 square feet of floor area.

b. *Section 217.2: Use of existing residential buildings and land by a nonprofit organization shall not adversely affect the use of the neighboring properties.*

The use of the existing buildings and land by the Foundation are regulated by Conditions so as to not adversely affect the use of neighboring properties. No more than 12 Foundation employees may have offices at Halcyon House and the townhouse driveway and rear parking court provides more than adequate parking for the employees. All of the proposed IIGR activities are educational for fewer than 50 participants, with over half of those for 20 or fewer participants. Many if not most, of the IIGR participants will come from outside the Washington, DC area, will stay at Halcyon and will not have vehicles. The participant demographic and nature of the IIGR will be of very low impact and, except for the one annual conference, will not require valet parking operations.

Most activities will occur during business hours, Monday through Friday, 7 a.m. to 8 p.m. Evening events that the Foundation intends to host are limited in number and are for invited guests only. The majority of Foundation events will be attended by fewer than 50 persons and frequently, fewer than 25. At all times, the Foundation will have strict control over the operations, events, and private functions. Public and private social events have been held at Halcyon House over the past 20 or so years without requisite approval (prior to the current ownership). Not only does the Foundation seek approval, but it has a history of abiding within the confines of conditions as evidenced at Evermay. The Foundation has met with neighbors

and the Advisory Neighborhood Commission (“ANC”) 2E, and has committed to implement a comprehensive list of requirements and protocols to minimize external effects, which are set forth in the previously referenced Conditions.

c. *Section 217.3: The amount and arrangement of parking spaces shall be adequate and located to minimize traffic impact on the adjacent neighborhood.*

The Foundation has endeavored to ensure that adequate measures are in place to mitigate and minimize traffic impact on the adjacent neighborhood. After installation of the turntable in the rear parking court, there is adequate space on-site to park approximately 18 cars (not including the townhouse lot), as detailed in the Technical Memorandum prepared by Gorove/Slade, dated August 5, 2013, as amended August 27, 2013, for the subject “Halcyon House – Parking and Loading Statement,” (“Memorandum”). See Exhibit I. This amount of parking will suffice for events of 40 or fewer guests, including staff and vendors with vans, who will be directed to park on-site, negating the need for street parking. To facilitate turning movements within the rear parking area, turn-around measures will be constructed and/or installed under the covered area. This will negate the need for loading and unloading in the front of the Property.

For any event, parking will be directed by either the Applicant’s staff (for any event under 40 guests) or by valet service (for any event over 40 guests), however, for any event over 150 guests, valet service will be utilized in combination with shuttle service. When valet services are used, the Conditions will require the Foundation to notify guests that complementary valet parking will be provided and recommended. Because street parking is at a premium and is for the use of residents, Gorove/Slade, in conjunction with U Street Parking, reviewed the Georgetown area to discern the most probable locations for off-site parking. Priority was given

to those locations west of Wisconsin Avenue and north of M Street. A list of those garages, are detailed in the Memorandum Supplement, dated August 26, 2013 and included herein as Exhibit

J. Also, as necessary, the Foundation will work with its consultants to submit and actively pursue a valet parking permit application to ensure adequate space is reserved for efficient loading and unloading of passengers, cars and shuttles. As previously stated, for events over 150 guests, shuttle service to and from the parking facility will be utilized.

For previous events at the Property, loading and unloading occurred at all hours. However, pursuant to the Conditions, all deliveries will occur subject to guidelines setting forth a strict set of procedures and delivery times so as to mitigate noise and disturbance of neighbors at night. Also, because the Foundation owns, rather than rents, tables and chairs utilized for events, loading and unloading of furnishings which are the loudest and generate the most offensive impacts, will not be required.

d. Section 217.4: No goods, chattel, wares, or merchandise shall be commercially created, exchanged, or sold in the residential buildings or on the land by a nonprofit organization, except for the sale of publications, materials, or other items related to the purposes of the nonprofit organization.

No goods, chattel, wares or merchandise will be commercially created, exchanged or sold in the residential building or on the land by the Foundation, except for the possible sale of publications, CDs, materials, or other items related to the purposes of the Foundation.

e. Section 217.5: Any additions to the building or any major modifications to the exterior of the building or to the site shall require the prior approval of the Board.

There will be no additions to the buildings or any major modifications to the exterior of the buildings, or to the site, associated with the Foundation's use.

f. Section 3104.1: The Board is authorized ... to grant special exceptions, as provided in this title, where, in the judgment of the Board, the special exceptions 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 in accordance with the Zoning Regulations and Zoning Maps.

The special exception will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps and will not tend to adversely affect the use of neighboring property in accordance with the Zoning Regulations and Zoning Map. The very purpose of Section 217 is to allow large historic properties such as Halcyon House to be used for non-profit organization purposes, subject to review by this Board. In fact, the size and various components of Halcyon House lend themselves to multi-family housing, and this, along with use as a social venue space, was the manner in which the Property was used for years. Establishment of the non-profit use, and particularly, IIGR and Illuminate at Halcyon will help protect the landmark, allow its productive use pursuant to a set of approved Conditions, and contribute to vitality of Georgetown Historic District.

VI.

Community Support

The Applicant has actively engaged the community in discussions on the proposed non-profit use at Halcyon House for the past six months. Invitations to neighbor meetings were sent to residents within the 200-foot radius, and those meetings were held on February 19, 2013, March 12, 2013 and August 26, 2013. The Applicant also appeared at the ANC 2E's duly noticed and regularly scheduled meeting of July 2, 2013 and is scheduled to appear again on September 3, 2013. As this document was required to be filed on September 3rd, the Applicant will submit a post-submission report regarding the ANC's findings.

VII.
Witnesses

The following witnesses will provide testimony at the Board's public hearing on the application:

1. Sachiko Kuno, S&R Foundation/Halcyon House, LLC
2. Erwin Andres, Gorove/Slade

VIII.
Exhibits in Support of the Application

The following exhibits are attached to this statement in further support of the application:

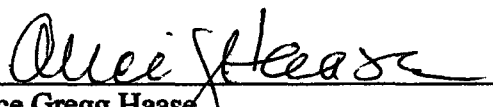
- Exhibit A:** Survey of Halcyon Georgetown illustrating the site
- Exhibit B:** Portion of the Zoning Map illustrating the site and surrounding area
- Exhibit C:** Aerial View of Halcyon House
- Exhibit D:** Townhouse Adjacent to Main House
- Exhibit E:** Map Showing Street Grid around Halcyon House
- Exhibit F:** Future Land Use Map of the Comprehensive Plan
- Exhibit G:** S&R Foundation Articles of Incorporation and Amendment
- Exhibit H:** Proposed Special Exception Conditions
- Exhibit I:** Technical Memorandum prepared by Gorove/Slade, dated August 5, 2013, for the subject "Halcyon House – Parking and Loading Statement."
- Exhibit J:** Supplement to Technical Memorandum, prepared by Gorove/Slade, dated August 26, 2013.
- Exhibit K:** Outlines of Witness Testimony:
- Sachiko Kuno, S&R Foundation/Halcyon Georgetown, LLC and;
 - Erwin Andres, Gorove/Slade; and

IX.
Conclusion

For the reasons stated above, the requested relief meets the applicable standards of the Zoning Regulations and can be granted without substantially impairing the intent, purpose, and integrity of the Zoning Regulations. The Applicant therefore respectfully requests that the Board grant the application.

Respectfully submitted,

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