

October 20, 2013

RECEIVED
D.C. OFFICE OF ZONING
2013 OCT 21 AM 9:03

Re: District Department of Transportation Report and DC Office of Planning Report
BZA Application No: 18638, Rosebusch LLC and Gregg M. Busch

Dear Chairman Jordan and Members of the Board of Zoning Adjustment:

I am a resident of 1515 15th Street, NW (The Metropole) and I will be directly impacted by the proposed development at 1456-1460 Church Street, NW, as my residence looks directly across the alley to the building site. I have submitted a letter on October 17, 2013 (yes, the long one) that is now Exhibit 30 within the record for this case. I am submitting this supplemental letter because I will be unable to attend the hearing for this case scheduled for October 22, 2012, as I will be out of town for medical purposes. My October 17, 2013 letter presented my concerns regarding the project itself; this supplemental letter is being sent to you to note what I consider the complete inadequacy of the reports submitted to the Board in regards to BZA Application No: 18638 by the DC Office of Planning (OP) Report and District Department of Transportation (DDOT).

District Department of Transportation Report, October 16, 2013 (Exhibit 29)

I implore the Board to not accept the waiver for a late filing by the DDOT. The DDOT is well of the requirement under Section 3114.2 that public agencies are to submit their report and recommendation on applications at least 7 days prior to the date set for a hearing. It also my understanding that the DDOT had, at a minimum, 40 days to review this application per the regulations. It is difficult for members of the general public to respond to any public agency determination within the 7-day window between the submission date for agencies and the public hearing—let alone within any time that is less than the required seven days. My October 17, 2013 letter discusses parking and other transportation issues in detail, so I will not repeat those issues here; however, if I had the benefit of a timely filed DDOT report I would have responded to the recommendations within that report directly.

Further, the waiver request form (Form 150) requires that the requester needs to "(o)n a separate sheet of 8 1/2" x 11" paper, state each and every reason why the Zoning Commission (ZC) or Board of Zoning Adjustment (BZA) should grant your motion or request, including relevant references to the Zoning Regulations or Map." I do not see where this has been submitted for the Board's consideration.

Further, this is such an important project with potential significant adverse impacts to the surrounding community. If the Board does accept the DDOT report into the record, it should question why there is no serious evaluation by DDOT on the amount of relief from the parking requirements, and why no transportation impact study was requested of the applicant to justify why the 19 spaces are not needed, as well as how loading and all the issues associated with such a large building will be managed.

DC Office of Planning Report, October 15, 2013 (Exhibit 26)

The expectation of the Board, and the public at large, should be that an independent, reasoned evaluation or analysis is done by the OP of applications for relief of the requirements of the zoning regulations. It appears that the OP has failed to do so in the review of this application. I make this assertion as the

Case # 18638
Mesterhazy supplemental letter in opposition

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BOARD OF ZONING ADJUSTMENT
District of Columbia
CASE NO. 18638 EXHIBIT NO. 32
Board of Zoning Adjustment
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EXHIBIT NO. 32

language within the OP report and the applicant's October 8, 2013 statement is very similar—and often the same word for word. It is as if the OP simply paraphrased much of the applicant's submission materials. This has occurred for all the relief requested—the variances and special exceptions. As such, I trust that the Board will take a critical review of the OP recommendations for approval for all the significant relief, under both variances and special exceptions, which the applicant has requested.

I discuss my thoughts on the OP evaluation, or lack thereof, on the variances first, followed by my thoughts on OP's evaluation on the special exceptions.

Variances

Requested Relief from Section 2604.2, Lot Occupancy

Regarding the first two prongs of the variance test for lot occupancy relief – that is, is there an exceptional condition of the property that would result in a practical difficulty, the OP provided one paragraph in its report. This paragraph has six sentences. Three of these sentences appear to be nearly identical to sentences within the applicant's October 8, 2013 statement. I've compared these sentences below:

From the applicant's 10/8/1013 statement, under C. The Site's Extraordinary or Exceptional Conditions, p. 14:

“These existing structures must be incorporated into the design of the new building, which also limits and constrains the floor plate of the building.”

From the OP report, under Exceptional Situation Resulting in a Practical Difficulty, p. 5:

“The three historic structures, combined with the narrow and small dimensions of the lot, limit and constrain the proposed structure's floor plate.”

From the applicant's 10/8/1013 statement, under D. Resulting Practical Difficulty, p. 14:

“The Zoning Regulations permit buildings in the C-3-A District to occupy up to 80% of their lot when the project uses the IZ bonus density. Because of the existence of the historic townhouse structures and the small, 3,420 square foot Site, the Applicant proposes to occupy 85% of the lot.

From the OP report, under Exceptional Situation Resulting in a Practical Difficulty, p. 5:

“The Zoning Regulations permit structures in the C-3-A District to occupy up to 80% of the lot through Inclusionary Zoning (IZ). The Applicant states that occupying 85% of the lot is necessary to complete the project because preservation of the three historic structures would impact the design and layout of the proposed development.”

From the applicant's 10/8/1013 statement, under D. Resulting Practical Difficulty, p. 14:

“The setbacks necessary to accommodate the existing historic townhouse structures pushes the mass of the building to the rear of the Site, which affects the ability to conform to the lot occupancy requirements.”

From the OP report, under Exceptional Situation Resulting in a Practical Difficulty, p. 5:

"The setbacks necessary to accommodate the existing three historic structures pushes much of the building to the rear of the site."

Requested Relief from Section 2101.1 Parking Variance

Regarding the first two prongs of the variance test for relief from the required number of parking spaces, that is, is there an exceptional condition of the property that would result in a practical difficulty, the OP provided two paragraphs in its report. These paragraphs essentially paraphrase the two paragraphs contained within the applicant's October 8, 2013 statement. I've included these in their entirety below:

From the applicant's 10/8/2013 statement, under "D. Resulting Practical Difficulty, p. 15:

"The Applicant has encountered practical difficulties in meeting the strict application of the parking requirements. The zoning regulations require that the proposed development provide 19 parking spaces at a minimum of 9 feet wide and 19 feet long. Because the Site is only 38 feet wide, however, there is simply not enough room to accommodate all the required elements.

Due to the extreme narrow width of the lot and the historic buildings on the Site, the Applicant cannot excavate the Site to provide below-grade parking, ramps for two-way circulation, or a turning radius sufficient to ingress or egress a parking garage. One compact space alone is 8 feet wide by 16 feet long. Minimum width dimensions to have ramp turning movement and a ramp going down to another level is approximately 60 feet, yet the Site is less than two-thirds that width. It is therefore virtually impossible for the Applicant to meet the parking requirements. As a result, strict compliance with the off-street parking requirements would result in a practical difficulty to the Applicant, thus requiring a variance from section 2101.1."

From the OP report, under Exceptional Situation Resulting in a Practical Difficulty, p. 5:

"2101.1 requires one parking space for every two units. The proposed project would include 38 units, and would therefore need to provide 19 spaces, each measuring at least 9 feet long and 19 feet wide. The Applicant proposes to provide two substandard spaces.

The site's dimensions create a practical difficulty for the Applicant in that the lot is not large enough to accommodate the required 19 spaces. In addition, below-grade parking would similarly be impractical; the narrow width of the lot, combined with the site's existing historic structures, would not allow for excavation of the site to provide below-grade parking, ramps for two-way circulation, or a turning radius sufficient to access a parking garage."

In regards to the requested lot occupancy and parking variance relief, the OP report offers no independent review of the applicant's claims of the subject site's extraordinary or exceptional conditions, nor why these conditions may result in a practical difficulty. In fact, in terms of size there is no evaluation of how the proposed site compares to others on the square. There is no discussion as to whether or not the historic structures actually do limit construction at the site, nor is there any discussion as to why the multitude of

allowable uses within the C-3-A/ARTS zone cannot be constructed at the subject site without requiring any relief. (I will remind the board that the three townhouses, while over 100 years old, have been continuously used as single-family homes in accordance with the existing zone). OP needs to explain what the practical difficulty is. In fact, in my previous submission (now Exhibit 30), I cited a number of recent BZA cases where the OP argued, and the Board agreed, that the small size of a lot, or the small size of an existing historic townhouse, do not result in extraordinary circumstances. I also attached the OP report for a BZA application for the building constructed immediately east of the subject lots (BZA case # 17459) where the OP found that with similar site conditions (a small lot and existing historic structure) the need for a parking variance was a "created circumstance resulting from the number of residential units (27) proposed for the project, not from any exceptional situation or circumstance. As such, the Board should, at a minimum, ask the OP why their argument in that case does not apply in this case.

Further, as the applicant describes in its October 8, 2013 statement, the existing townhouses on the site are between 28' to 34' feet deep (from their Church Street facades). The applicant's own plans, however, show that the tower above the townhouses is planned to be set back only 16'2" from Church Street. As such, any claim by the applicant that "The setbacks necessary to accommodate the existing historic townhouse structures pushes the mass of the building to the rear of the Site, which affects the ability to conform to the lot occupancy requirements" does not hold, as they are not respecting the existing 28'-34' dimensions of the townhouses in the first place. In fact, it appears from the applicant's first floor plan (page 7) that the portion of 1460 Church Street between approximately 28' to 34' is completely removed. In addition, the first floor is pulled back 18' from the rear property line, meeting the required 15'6" rear yard setback (which is based on an incorrect allowable height). If the first floor can meet the required setback and accommodate the existing historic townhouse structures, then it is not apparent that any preservation of any portion of the historic townhouse structures actually is causing any practical difficulty. As such, the OP should have some responsibility within their report to describe what they mean by "The setbacks necessary to accommodate the existing three historic structures pushes much of the building to the rear of the site."

Finally, and of note, the OP offers throughout that the two substandard parking spaces should not count towards the required 19, and that the applicant is actually requesting relief from all 19 spaces. I agree with this assessment—however the OP report offers no critical evaluation on how granting the relief for the full 19 spaces will not harm the public good, it only recites that "(a)lternative means of transportation such as bike, bus and Metrorail should mitigate the proposed elimination of parking spaces." (Page 5 of the OP report) What does "should" mean? Where is the analysis that shows that it will, or that it will not? Is the BZA to base its decisions on "shoulds?" Likewise, the proposed non-provision of 19 required parking spaces is in direct contrast to the intent, purpose, and integrity of the zoning regulations and is far outside of the amount of relief that the BZA has granted for other similar projects within the C-3-A/ARTS overlay. The 1 space per 2 units already takes into account the provision of alternative means of transportation such as bike, bus, and Metrorail—thus the intent of the zoning code is to provide adequate parking for those living within the units that do not use those means of transportation. It is unclear how the OP report can simply state "There would be no substantial impairment to the intent, purpose and integrity of the Zoning Regulations and Map should the Board grant the requested variances. The proposed project would be consistent with the goals of the Arts Overlay and would provide a project with mixed-income housing." (Page 5 of the OP report) What is the basis for that determination? Where is the analysis?

Special Exceptions

Requested Relief from Section 411, Roof Structures

In its evaluation on the request for relief under Section 411, Roof Structure, the OP, on page 5 of its report, states that:

"The Applicant is seeking special exception relief from § 411.3, which requires that equipment be enclosed in one enclosure, and § 411.5, which requires that enclosing walls from roof level shall be of equal height. The roof structures would vary in height between 8 feet 6 inches and 14 feet. The Application indicates that flexibility is necessary to accommodate the Project's egress stairs and mechanical equipment for the elevator penthouse.

Combining the roof structures in one structure of a single height would increase the visibility of the roof structure, as it would be a significantly larger and taller structure than those that are proposed. The structures would be sufficiently set back from the street frontages, reducing their visibility from the street level. Overall, the location and design of the rooftop structures should minimize their visual impact."

The applicant is requesting relief for the height of a penthouse (6'2" above that which is allowed under both the Height Act and the restriction placed under Section 1902.1 of the zoning code) in addition to relief from having multiple penthouse structures under Section 411. The OP states that "(c)ombining the roof structures in one structure of a single height would increase the visibility of the roof structure, as it would be a significantly larger and taller structure than those that are proposed." This OP statement, on its face, does not make sense. A consolidated penthouse, at the highest height proposed by the applicant, would not be "a significantly...taller structure than those that are proposed"—it would be the same height than what is proposed. The Board should dismiss this statement by the OP.

Further, under Section 411.11, special exception relief also allows relief from Section 770.6, which requires the penthouse structures be "set back from all exterior walls a distance at least equal to its height above the roof upon which it is located." As such, the requested relief from Section 411 allows the applicant to not set back the north stair tower from any façade—including the front façade. This lack of a setback, according to the applicant's plan, will result in an 83'6" metal paneled tower rising above the front of the historic townhouses. Is this "sufficiently set back from street frontages" as OP claims? I will leave that up to the Board to determine. However, I would argue that 411.11 requires the Board to consider the adverse affect that any relief under Section 411 might have on the light and air of adjacent buildings—and the OP report is silent on this consideration. The design, as proposed, does result in an approximate 57' tower of metal panels above the height of the existing townhouses on the subject property. This tower can be seen on the massing view on page 20 of the applicant's drawing package (although the hatched-line incorrectly shows that the stair tower is somehow not part of the front façade) and on the west elevation on page 13. Being only approximately 23' from windows within The Metropole units, and a closer approximate 19' from those units' balconies, this tower will have a significant adverse effect on the light and air of the adjacent building's residents—let alone its impact on The Metropole's courtyard's trees and plants and the usability of The Metropole's courtyard—which is the only common outdoor element at The Metropole that is available to its residents.

Special Exception, Section 774, Rear Yard

The OP report's review of the conditions that the applicant is required to meet in regards to rear yard relief suffers from the same issue that I described above regarding the variance tests. That is, the language within

the OP report and the applicant's October 8, 2013 statement is very similar—and often the same word for word. Again, it is as if the OP simply paraphrased much of the applicant's submission materials and offered no independent, critical evaluation or analysis. For the Board's consideration, I've compared the statements from the OP report and the applicant's October 8, 2013 statement below:

774.2 The Board of Zoning Adjustment may waive the rear yard requirements of this section pertaining to C-3-A, C-3-B, C-3-C, and C-4 Districts in accordance with the requirements of § 3104 for special exceptions; provided, that the standards in §§ 774.3 through 774.6 shall be met.

774.3 Apartment and office windows shall be separated from other buildings that contain facing windows a distance sufficient to provide light and air and to protect the privacy of building occupants.

From the applicant's 10/8/1013 statement, under D. Rear Yard Relief, p. 10:

"The proposed residential building has been designed to ensure sufficient light and air, and to protect the privacy of the residential occupants. Each unit in the building will front on the street or alley elevations of the building, thereby providing maximum light and air to these apartments without affecting the privacy of the residents. The subject Property's rear elevation is separated from the closest adjacent building by a 10 foot alley, which is adequate for the proposed building. Moreover the adjacent building provides its own rear yard, thereby protecting the residents of that building. The north elevation fronts on Church Street (50-feet. wide) and faces directly onto a parking lot. There are no office windows confronting any apartment windows."

From the OP report, under 774.1 Rear Yard, p. 6:

"The proposed Project should ensure sufficient light and air and privacy. The Subject Property's rear elevation is separated from the adjacent property by a 10 foot alley. In addition, the adjacent property also includes a rear yard, providing further separation. The proposed Project would not include apartment windows facing the office windows of adjacent buildings."

774.4 In determining distances between windows in buildings facing each other, the angle of sight lines and the distance of penetration of sight lines into habitable rooms shall be sufficient to provide adequate light and privacy to the rooms.

From the applicant's 10/8/1013 statement, under D. Rear Yard Relief, p. 11:

"The proposed building has been designed to limit the angle of sight lines and to maximize the distance of penetration of sight lines into habitable rooms. The principal windows overlook either Church Street or the rear alley so that light and privacy are adequately protected. The two-foot rear yard relief will have little impact on the angle of the sight lines due to the rear alley separating the rear windows from the residential building to the south. As noted above, no residential windows confront an office building."

From the OP report, under 774.1 Rear Yard, p. 6:

"The proposed design appeared to limit the angle of sight lines and to minimize the distance of penetration of sight lines into habitable rooms. The rear alley separates the proposed Project's rear windows from the residential building to the south."

- 774.5 The building plan shall include provisions for adequate off-street service functions, including parking and loading areas and access points.

From the applicant's 10/8/1013 statement, under D. Rear Yard Relief, p. 11:

"The proposed building plan has adequate off-street service functions, including two off-street parking spaces, which are sufficient for the demand of the building, given the Site's excellent transportation options and perfect "Walk-Score" of 100 percent. No loading facilities are required or provided for the building due to its historic stature, although access will be available from the service alley."

From the OP report, under 774.1 Rear Yard, p. 6:

"The proposed building plan includes adequate off-street service functions. The Applicant has requested relief to limit on-site parking to two sub-standard parking spaces. No loading facilities are required or provided for the building, although access would be available from the alley."

- 774.6 Upon receiving an application for an approval under § 774.2, the Board shall submit the application to the D.C. Office of Planning for coordination review, report, and impact assessment, along with reviews in writing of all relevant District of Columbia departments and agencies including the Departments of Transportation and Housing and Community Development and, if a historic district or historic landmark is involved, the State Historic Preservation Officer.

From the applicant's 10/8/1013 statement, under D. Rear Yard Relief, p. 11:

"The Applicant has coordinated with the Office of Planning and the District's Department of Transportation on the review of this project. The Applicant has received conceptual design approval from HPRB and will continue to work with HPO staff as the project progresses through the final design stages."

From the OP report, under 774.1 Rear Yard, p. 6

"The Applicant has coordinated with OP and DDOT on the review of this Project. The Applicant received conceptual design approval from HPRB on June 27, 2013."

Of importance, Section 774.6 requires the Board to submit the application to OP for coordination review, report, and *impact assessment*. I trust that the Board's expectation is that the OP will actually do an impact assessment, and not just paraphrase statements from an applicant's statement, as has been done in this case.

Special Exception, 1902.1, Uptown Arts Overlay

It is difficult to even comment on the OP report related to the height of the building, as the building as proposed does not meet the requirements of the Act to Regulate the Height of Buildings in the District of Columbia (DC code 6-601.01 to 6-601.09 and US 36 Stat. 452, as amended) (hereby referenced as the Height Act).

As I pointed out in my October 17, 2013 letter to the Board, according to the June 15 and October 8 plans presented in the BZA application, the height of the proposed building is 75 feet. Section 5 of the Height Act allows buildings on commercial streets to be no more than twenty (20) feet taller than the width of the adjacent street. It appears that Church Street has a 50' wide right-of-way. If so, how can the applicant exceed the Height Act, which would limit the building to 70' (plus an allowable 18'6" for the mechanical penthouse)? It appears to me that the applicant is basing the 75' height on what is allowed under Section 1902.1 of the Zoning Code – however, while the zoning code height limitations may exceed the height allowed within the Height Act based on a certain widths of rights-of-way, that does mean that an applicant may exceed the limitations set within the Height Act. It is my understanding that there is no relief for this type of development allowed under Federal and District law to exceed the Height Act.

The BZA file for the building immediately to the east and adjacent to the subject properties notes that the allowable building height is 70'. Per the plans for that building, it was constructed to 70'. (See BZA file # 17459 and the attachment). There is no difference in the size of the right-of-way of Church Street or any other factor that I can identify that would allow a project at the subject site to exceed the 70' limit of the Height Act. (Of note, in my October 17, 2013 letter I also pointed out that the applicant's graphics that show the measured height of the proposed building at 75' but also show the proposed building to be the exact same height as this existing building immediately east on Church Street—which is 70').

Further, and as I stated in my October 17, 2013 letter, apart from the project's apparent non-conformance with the Height Act, the applicant appears to propose a height of 75' with a penthouse at 14'8", for a total height of 89'8", and is asking for special exception relief from Section 1902.1. Section 1902.1 allows a bonus height of 10' above the C-3-A matter-of-right height of 65' in the ARTS overlay district, allowing for a maximum height of 75'. However, with this bonus, Section 1902.1 also limits the penthouse to 8'6", for a total height of 83'6". This 83'6" is the same total height that would result with the matter-of-right height of 65' in the C-3-A and allowable 18'6" penthouse. It appears that the intent of the bonus is to allow additional allowable uses within the top 10' of a structure within the ARTS overlay district—not to allow a higher height than what is already allowed as a matter-of-right. The applicant's proposed 89'8" structure requires relief for 6'2". That's 6'2" above a bonus height that the applicant is choosing to take, and 6'2" above the penthouse of the condominium immediately to the east. A deviation from the height limits within the ARTS overlay district does not appear to be intent of the bonus of 10' in height allowed under 1902.1 and, within such a constrained and highly developed area, will adversely impact the availability of light and air, and thus the general welfare of neighboring properties.

The Board should question the OP as to what is the required height of the structure under the Height Act, and/or if they even considered the Height Act in developing their support for the special exception relief requested. Again, there appears to have been no independent, critical evaluation or analysis is done by the OP of this application's requests for relief of the requirements of the zoning regulations.

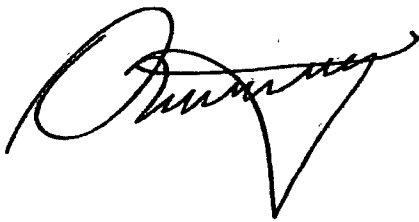
Other Issues

The table on page 2 of the OP report states that under the regulations the allowable FAR is 5.3. I questioned this assertion in my October 17, 2013 letter and will not repeat my argument here. At a minimum, however, the Board should question the OP on how they arrived at an FAR of 5.3, and how this does not conflict with the FAR limitation of 4.8 in both Section 2604.1 and 1909.1. I continue to assert that any FAR above this limitation, which is cited twice in the regulations, appears to be in direct conflict with the intent of the regulations. Per the zoning analysis provided by the applicant on page 2 of its drawing package, the applicant notes that it is taking a bonus FAR available under Section 1904.3, which it can avail itself of. However, 1904.3 does not say that this is additive onto any bonus limit that is available under 2604.1. Any bonus under 1904.3 should still be restricted by the very clear language of 1909.1. If not, then the Board should have the OP describe what the intent of 1909.1 is.

Conclusion

As I stated in my October 17, 2013 letter, I am not opposed to development on this site. I just believe that the proposed structure, with all of the issues and questions, is the wrong type of development for this space. So much is being presented without support and as such, and it appears that that problem continues through the reports of the DDOT and OP. The Board is being asked to take much on faith when this project has the potential to severely impact many, many residents that actually live directly one the alley and face onto these three exiting townhouses. At the very least, I hope that the Board has as many questions about the proposed building as I do. Given that there are so many other options that could have been presented to develop the subject site, each not requiring so many exceptions and relief from existing zoning code, I believe that the Board should not approve the developer's requests for relief.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul M. Mesterhazy', with a large, stylized initial 'P' and a long, sweeping horizontal stroke.

Paul M. Mesterhazy, Esq.

1515 15th Street NW, #430

ATTACHMENT A
BZA Case 17459 - Adjacent Church St. Condominiums

CHURC

WASHINGTON, DC 20005

REAR YARD 14'-7" (70'-0" x 2.5") REQUIRED
20'-0" PROVIDED

SIDE YARD NOT REQUIRED

BUILDING HEIGHT ALLOWABLE BUILDING HEIGHT 70'-0"

PROPOSED BUILDING HEIGHT 70'-0" (BUILDING HT. @ CENTERLINE OF CHURCH STREET
FACADE, ABOVE SIDEWALK AT PROPERTY LINE)

PARKING 0 REQUIRED PER SECTION 2100.5 - NO PARKING IS REQUIRED
6 STANDARD SPACES (9'-0" X 19'-0") PROVIDED

LOADING NONE REQUIRED

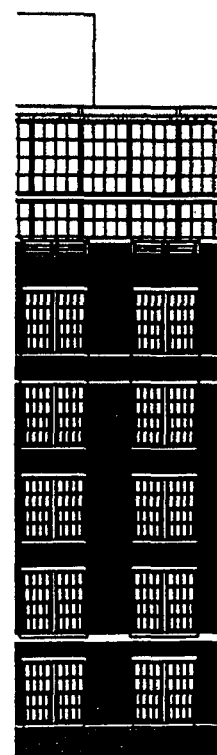
6. FIRE PROTECTION AND REQUIRED EGRESS COMPONENTS: SEE T1.2 and T1.3

7. REQUIRED HANDICAP ACCESSIBLE (ADAPTABLE DWELLINGS)
2 REQUIRED, 2 PROVIDED

8. BUILDING CODE: DC CONSTRUCTION CODE SUPPLEMENT DCMR 12A/2003
DCMR 11 ZONING/ 2003
INTERNATIONAL BUILDING CODE/2000
INTERNATIONAL PLUMBING CODE/2000
INTERNATIONAL MECHANICAL CODE/2000
INTERNATIONAL FIRE CODE/2000
INTERNATIONAL PROPERTY MAINTENANCE CODE/2000
INTERNATIONAL FUEL CODE/2000
INTERNATIONAL ENERGY CONSERVATION CODE/2000
NFPA NATIONAL ELECTRIC CODE/1996
FAIR HOUSING ACT

9. THE PROJECT INCLUDES THE NEW CONSTRUCTION OF A 7 STORY CMU AND HALLOW
CORE PLANK BUILDING. THE BUILDING HAS 27 RESIDENTIAL UNITS ON SEVEN LEVELS
WITH 6 TOTAL PARKING SPACES ON GRADE AT THE REAR OF THE BUILDING.
WORK INCLUDES THE CONSTRUCTION OF TWO FIRE STAIRS, ONE ELEVATOR SERVING
CELLAR LEVEL THRU THE SIXTH FLOOR, COMPLETE HVAC, PLUMBING, AND
ELECTRICAL. THE BUILDING WILL BE FULLY SPRINKLERED WITH A STANDPIPE.

10. HI-RISE CONSTRUCTION. NO.



PLAN KEY



OR AREA RATIO

525)

AR

GSF

NED FOR RESIDENTIAL

-, VARIANCE TO REDUCE
TO PROVIDE RESIDENTIAL
FROM -% TO -% WAS

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CHURC