DISTRICT OF COLUMBIA
BOARD OF ZONING ADJUSTMENT

In re: Application of	)	
THE PHILLIPS COLLECTION	)	Application No. 16618
and	)	
BRIAN E. and JENNIFER B. GIANNATTASIO	)	

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MOTION OF PARTY OPPONENTS TO DISMISS APPLICANT'S REQUEST FOR CERTAIN AREA VARIANCES AND SPECIAL EXCEPTIONS

Party Opponents, Solange MacArthur-Muller, Morton and Hanna Schussheim, Richard and Ingrid Suisman, Carol Ridker and the Missionaries of Africa, by their undersigned counsel, hereby move to dismiss the application of applicant The Phillips Collection for certain area variances and special exceptions sought by the above-referenced application. This Motion is submitted at this stage because applicant has failed to meet its burden to establish a *prima facie* case. If granted, this Motion would avoid the need for further hearing of this case. As grounds for this Motion, the Party Opponents state as follows:

I. Summary of Argument

On December 5, 2000, the BZA conducted a hearing at which the applicant, The Phillips Collection, presented its case in support of its application for three area variances and two special exceptions.[1] Three witnesses were offered by Applicant and several exhibits introduced

[1] Applicant seeks variances to exceed the allowable FAR of 1.8 (§ 402.4); to exceed the lot occupancy limit of 60% (§ 403.2); to enlarge a non-conforming structure (§ 2001.3); and special exceptions to place mechanical equipment on the roof without the prescribed set back (§ 400.7); and to have more than one principal structure on the same lot.

BZA
Case No. 16618
Exhibit No. 155
Board of Zoning Adjustment
District of Columbia
CASE NO.16618
EXHIBIT NO.155

to supplement the written application and other submissions previously tendered by Applicant. Members of the BZA also questioned the witnesses, and Applicant rested. The hearing was adjourned to January 9, 2001 to provide an opportunity to the Party Opponents to cross-examine the Applicant's witnesses and to present their own witnesses[2] and was subsequently continued to May 22, 2001. However, a review of the record, including the December 5th transcript, demonstrates that the Applicant has not and cannot meet the burden of establishing a *prima facia* case because it cannot show that it can satisfy each of the three elements required for an area variance as outlined below. As Applicant cannot meet its burden to go forward, there is no need for further proceedings, and Applicant's case for the three area variances should be dismissed without added burden to the BZA or the Party Opponents of what is essentially an unnecessary hearing.

II. For a Variance, Applicant Has the Burden to Show Uniqueness of Property, Undue Hardship or Practical Difficulty and that Granting the Variance Will Not Harm Public Good or Zoning Plan

In order to obtain a variance under D.C. Code § 5-424(g)(3), an applicant must demonstrate to the BZA all of the following elements: (a) the property is unique because of some physical aspect or "other extraordinary or exceptional situation or condition" inherent in the property; (b) strict application of the zoning regulations will cause undue hardship or practical difficulty to the applicant; and (c) granting the variance will do no harm to the public good or to the zone plan. Gilmartin v. DCBZA, 579 A.2d 1164, 1167 (D.C. 1990); Capitol Hill Restoration Society v. District of Columbia Bd. of Zoning Adjustment, 534 A.2d 939, 941 (D.C. 1987). The courts have further refined this to apply the practical difficulty test to area variances

[2] At the resumed hearing, Applicant's traffic expert, Mr. Louis Slade, will provide additional details concerning valet parking, but his testimony is not anticipated to vary in any significant way the Applicant's presentation.

and the hardship test to use variances. Tyler v. DCBZA, 606 A.2d 1362 (D.C. 1992) Unless all three elements can be demonstrated by the applicant, a variance is not warranted and may not be granted. It is the duty of the Applicant to show the existence of each element; it is not the obligation of opponents to refute them. See, Gilmartin, supra; Assn for Preservation of 1700 Block of N Street v. DCBZA, 384 A.2d 674 (D.C. 1978); Taylor v. DCBZA, 308 A.2d 230 (D.C. 1973). As the Applicant's case is now virtually complete, the Board can and should measure whether Applicant has sustained its burden. We think it apparent that Applicant has failed to do so, and therefore the variance requested must be denied at this stage of the proceeding.

Further, even if The Phillips could show that the property in question is unique, it has not demonstrated, and cannot do so, that such uniqueness creates a practical difficulty which would prevent The Phillips from using the property for museum purposes. Indeed, it has explicitly stated that, as a matter of right it can build a museum extension without the requested variances though smaller and at less cost. (See Letter from Michael Cain, counsel for The Phillips Collection, to ANC2B dated November 8, 2000 at page 2 attached as Exhibit A.)[3] What The Phillips seeks to do, which it may not under applicable law, is to build a larger structure than is allowed because doing so will enhance its building. Such a request does not demonstrate "practical difficulty". There must be a showing of a compelling need to build in violation of the existing restrictions and that cannot be provided when The Phillips shows its ability to build within the limits of the law.

> "A variance is proper or permissible only in cases of necessity and for substantial and compelling reasons." Yokely: Zoning Law and Practice (4th ed. 1979) Section 21-6.

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[3] Note that the proposed Agreement included with that letter states on page 2 that "[the Phillips] has also developed an alternative plan for those properties which would not require BZA approval."

A. Unique Physical Aspect or Other Extraordinary or Exceptional Situation or Condition

It is fundamental "that the difficulties or hardship be due to unique circumstances particular to the applicant's property and not to the general conditions of the neighborhood." Gilmartin, 579 A.2d at 1168, citing Palmer v. Board of Zoning Adjustment, 287 A.2d 535, 539 (D.C. 1972). There is no requirement that the uniqueness inhere in the land at issue; the structure can also produce the "unique circumstances" as can extraneous events. Id.; citing Capitol Hill Restoration Society, 534 A.2d at 942; Monaco v. DCBZA, 407 A.2d 1091 (D.C. 1979). Although the D.C. variance statute does not preclude the approval of a variance where the uniqueness arises from a confluence of factors, the critical point is that the extraordinary or exceptional condition must affect a single property, thereby rendering it unique. Id.

District of Columbia courts have found unique physical aspects or extraordinary circumstances in a variety of situations. See Gilmartin, 579 A.2d at 1168 (unique confluence of the particular location of carriage house in relation to property boundaries and the two easements crossing the subject property make topography of the property unique and different from its neighbors); Monaco v. DCBZA, 407 A.2d at 1099 (private restrictive covenants may be considered in their own right as an extraordinary condition of the property); Tyler v. DCBZA, 606 A.2d 1362, 1365 (D.C. 1992) (need to preserve historic buildings is exceptional circumstance); Draude v. DCBZA, 582 A.2d 949, 955 (property dedicated to public service of providing health care constitutes exceptional circumstance); but see Capitol Hill Restoration Society v. DCBZA, 398 A.2d 13 (1979) (personal misfortunes of variance applicant or prior use of the property not exceptional circumstances). In all successful variance cases, the unique circumstances must relate to the property and its usage. But, The Phillips has shown nothing unique respecting the property. The property which is the subject of this application, 1618 21st

Street, N.W., displays no unusual features. It is a 15-unit apartment house comprised of two late 19th century structures in a block consisting of similar buildings. It is constructed above a hard rock surface, affecting many other buildings in the area. It is in the Dupont Circle Overlay District and is a contributing structure within that district. None of these factors is unique. Nor is the subject property affected by easements or covenants which give rise to a unique condition. Indeed, under the Phillips' proposal, the depth of the property would be enhanced if the alley behind it is legally closed and consolidated with the adjoining lots. Thus, without variances, the subject property is better suited to development than most Dupont Circle properties.

B. Regardless of Whether the Property is Unique, the Applicant Has Not and Cannot Demonstrate the Existence of a "Practical Difficulty" Which Is the *sine qua non* of an Area Variance

While we believe the Applicant has failed to meet its burden of showing the uniqueness of its property, we submit that regardless of whether it has done so, the Applicant has failed to show that a "practical difficulty" arises from the property. The seminal case explaining the practical difficulties test in the District of Columbia is Palmer v. DCBZA. 287 A.2d 535 (D.C. 1972). In Palmer, the court held that the "practical difficulties" standard applies to area variances. Id. at 540-41. Palmer did not establish a precise definition of practical difficulty. The Palmer court did state, however, that "it is certain that a variance cannot be granted where property conforming to the regulations will produce a reasonable income but, if put to another use, will yield a greater return." Id. (footnote omitted). A variance will be granted only where the applicant can show that without the variance, the property would not yield a sufficient return to be viable. This is more dramatically brought out in Tyler where the Court of Appeals took the BZA to task for failing to justify its grant of a variance by a showing of economic harm. The Court pointed out that merely reciting the building problems inherent in the size and shape of the

lot is not sufficient without a showing that use of the property is seriously (i.e., economically) compromised in the absence of an area variance. Draude and Gilmartin support this notion and its corollary that added expense alone will not entitle the property owner to a variance. Draude v. DCBZA, 582 A2d 949, 956 (DC 1990). The expense involved must rise to the level of a threat to the feasible use of the property. Put another way, the applicant must show more than a desire for a larger building. This is as true when the building will be used for a museum function as when it would be used for a commercial purpose. The Phillips has not done and cannot go beyond its stated desire to have more than what it is entitled to, since it has stated that within the legal limits it may still construct a viable structure.

The Palmer court put the same notion differently: for the BZA to find a practical difficulty "compliance must not be unnecessarily burdensome". The implication is that a viable, even if smaller, structure could be built without variances. If that is the case, then no variance is permitted.

Additionally, in Palmer, the court saw the request for putting the parking more than 800 feet from the business as a use variance, rather than an area variance since, if the owner rented for some use other than a public hall, the 800 feet would not be a problem. Similarly, in the case of the Phillips, what gives rise to the request for variances is its desire to convert a functioning and successful apartment building into a museum.

The test for determining "practical difficulties" for area variances is further refined in subsequent case law. In order to demonstrate "practical difficulties" an applicant must convince the BZA that:

> (1) compliance with the area restriction would be unnecessarily burdensome..., A.L.W. Inc. v. District of Columbia Board of Zoning Adjustment, 338 A.2d 428, 431 (D.C. App. 1975); and (2) the practical difficulties are unique to the particular property.

Barbour v. District of Columbia Board of Zoning Adjustment, 358 A.2d 326, 327 (D.C. 1976). (emphasis added)

Association for Preservation of 1700 Block of N Street, NW, and Vicinity v. DCBZA, 384 A.2d 674, 678 (D.C. 1978) ("1700 Block").

In applying this test, the BZA has to consider a number of factors, including, but not limited to: (1) the weight of the burden of strict compliance with the zoning regulation; (2) the severity or affect of the variance(s) requested; and (3) the effect of the proposed variance(s) on the overall zone plan. Gilmartin, 579 A.2d at 1170. In Gilmartin, the homeowner desired to park his car in a parking space adjacent to his house. The space was a couple of feet shorter than the legal requirement of 19 feet. The Board granted the area variance since it assumed that it would be infeasible to carve out a section of the house to accommodate the additional 2 feet. The Court sent it back to the BZA to take testimony as to whether it would indeed be an undue burden on the homeowner to reduce the house size. The stringent test imposed by the Court of Appeals demonstrates that The Phillips must do far more than state unsupported conclusions; it would have to show that the use of the building would not be viable without the variance. If that court was willing to go to those lengths to force the homeowner to demonstrate a need for the variance, how can the Phillips satisfy its burden by providing no more than vague assertions of desire for the additional space? What The Phillips has actually shown through its submissions and testimony is the opposite of practical difficulty or undue burden. It has not shown that a smaller scale building -- one with only the permitted FAR or the allowed lot occupancy -- could not house art galleries, could not allow conservation activities, could not provide educational facilities, or could not furnish food service or museum shop facilities. Rather, The Phillips has shown only that with a larger facility, it could do ***more*** of what it can already do with a facility constructed as of right. This is no different from the apartment house owner who asks for more

FAR to add density to an otherwise viable building, arguing that with more space, the owner could achieve a better return on investment. Such an argument has been consistently disallowed by the courts in the commercial setting. See, Palmer v. DCBZA, 287 A.2d. 535 (D.C. 1972); Barbour v. DCBZA, where a variance was denied for expansion of a kitchen even though alternative methods would have cost fifty to ninety percent more and reduced the interior or backyard living space. 358 A.2d 356 (D.C. 1976), rehearing *en banc den.* The court held that such additional expense was a burden but not an "undue burden."

To be sure, the courts have found some burdens to be "undue". In Wolf v. DCBZA, 397 A.2d 936 an area variance was granted only after the applicant was able to show that without it the marketability of the property was in doubt. (See, also National Merritt, Inc. v. Weist, 41 NY2d, 438, 361 N.E. 2d 1028 (1977) where the court accepted as a practical difficulty an inability to attain a reasonable return on the property.

> "It is well established that a mere desire to use property in a given manner, or in a manner designed to return a greater profit, does not constitute a showing of an undue hardship that will support the granting of a use variance." Bernstein v. DCBZA, 376 A.2d, 816, 820.

No different result is permitted merely because the Applicant is a non-profit institution. Contrasting The Phillips' presentation with the showing made by the YMCA in Association for Presentation of 1700 Block of N Street v. DCBZA, 384 A.2d 674 (1978) demonstrates how far short The Phillips showing is of the requisite demonstration. The "Y", as applicant for an area variance in 1700 Block demonstrated that without a variance from the parking requirements, it could have built a structure with only a 1/2 size swimming pool and could not have operated its core programs. In this circumstance, the BZA found -- and the Court of Appeals sustained -- that the unique nature of the property (it was of uneven configuration) caused a practical difficulty.

Here, the "practical difficulty" is merely that The Phillips would like a larger structure to accommodate a greater fill of activities. That is not a practical difficulty at all.

C. The Effect of the Proposed Variances Would Undermine the Zone Plan and Would be Detrimental to the Public Good

While the Party Opponents believe that they can clearly show that the proposed variances would harm the Zone Plan and be detrimental to the public good, such a demonstration would come in their portion of the case, now set to be heard on May 22, 2001. It is evident that the proposed variances are inconsistent with the Zoning Plan; that is inherent in the nature of all variances. The Board's examination at the hearing of The Phillips' own witnesses demonstrated the obvious concern over the increased vehicular and pedestrian traffic which would be an outgrowth of the substantial increase in the museum's size and activities. (See 12/5/00 BZA Transcript at pp. 192-218.) But, it is unnecessary to reach this stage, if, as the Opponents contend, The Phillips has failed to demonstrate both elements (a) and (b), as outlined above. The purpose of a Motion to Dismiss at this stage of the proceeding is to test the sufficiency of the movant's performance to this point. If it has been inadequate, then there is no need for the Opponents to put on evidence at all, for the Applicant's case will fail of its own inadequacies. In that circumstance, the Board is spared the unnecessary expenditure of its time and resources. The case should be dismissed.

III. Conclusion

Since the Applicant has failed to demonstrate the unique character of the property and has also failed to show that the property gives rise to "practical difficulty," the application should be dismissed without the need of a further hearing. The Party Opponents respectfully request such dismissal.

Date: May 3, 2001

Respectfully submitted,

Stephen N. Gell
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(202) 625-8311

Attorney for Morton and Hanna Schussheim, Richard and Ingrid Suisman, Carol Ridker and the Missionaries of Africa

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1201 Connecticut Avenue, N.W.
Washington, D.C. 20036
(202) 778-1800

Attorney for Solange MacArthur-Muller

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of May, 2001, I caused a copy of the foregoing **MOTION OF PARTY OPPONENTS TO DISMISS APPLICANT'S REQUEST FOR CERTAIN AREA VARIANCES AND SPECIAL EXCEPTIONS** to be delivered by hand to:

Michael A. Cain, Esquire
Hamilton and Hamilton, LLP
1775 Pennsylvania Avenue, N.W.
Suite 1100
Washington, D.C. 20006-4605

Peter R. Kolker



HAMILTON AND HAMILTON, LLP
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November 8, 2000

By Fax and Mail

Mr. Kyle Pitsor
Chairperson
Advisory Neighborhood Commission 2B
St. Thomas Parish
P.O. Box 33224
Washington, D.C. 20033-0224

RE: The Phillips Collection
BZA Application No. 16618

Dear Mr. Pitsor:

Following the Commission's meeting on October 11th, The Phillips Collection has been working hard to follow up on the Commission's various suggestions and recommendations.

The Phillips has engaged Mr. Louis Slade (Gorove/Slade Associates) to analyze existing and likely traffic conditions around the museum and to prepare an appropriate report. Mr. Slade met yesterday with the transportation consultant retained by certain of the neighbors.

When we were advised by the D.C. BZA staff that only the The Phillips had standing to ask the BZA to postpone the October 24th public hearing, we did so; the new date is December 5th. A copy of the letter is attached.

The Phillips has met twice with the group led by Mr. Suisman, and has responded to several written requests from them for information about the project. The Phillips has also met with the Head of Chancery for the Indian Embassy. The Cosmos Club's representative canceled his appointment with the project architect; the museum will meet the president of the Club next week. Unfortunately, none of those meetings has produced any substantive feedback on the merits of The Phillips proposal.

Attached is a draft of an agreement that The Phillips Collection is prepared to enter into with the Commission if the Commission will reinstate its formal endorsement of the project. The

Phillips remains convinced that its plan, which the Commission has reviewed and twice voted to approve, offers the best opportunity for meeting the museum's needs while mitigating external impacts on the neighborhood. If The Phillips is forced to retreat to its matter-of-right option, it will lose the chance to provide off-street parking and to exert more control over buses, catering delivery vehicles and valet parking. That option is much less expensive, but it nevertheless falls short of meeting the programmatic goals of the museum.

We look forward to the opportunity to discuss these issues again this evening. In the meantime, please do not hesitate to call me with any questions you may have.

Sincerely,

HAMILTON AND HAMILTON, LLP

Michael A. Cain

Michael A. Cain

Enclosures

cc: Vince Micone
Stephen Cochran
Jay Gates

DRAFT

AGREEMENT

This Agreement is made this _____ day of _____, 2000, by and between The Phillips Collection (hereinafter referred to as "Phillips") and Advisory Neighborhood Commission 2B (hereinafter referred to as the "ANC") for the purposes hereinafter set forth.

WHEREAS, Phillips is the lead applicant for approval of certain variances and special exceptions from strict application of the District of Columbia Zoning Regulations which are desirable for Phillips to carry out a plan for improvements to its existing museum buildings at 1600 - 21st Street, N.W., and its expansion into the adjacent property at 1618-21st Street, N.W., pursuant to the application filed with the District of Columbia Board of Zoning Adjustment ("BZA") as BZA Application No. 16618 (the "Phillips Project"); and

WHEREAS, Phillips has made 3 presentations to the ANC over the past 13 months in connection with its proposed project and the ANC has twice adopted formal resolutions in support of the Phillips Project; and

WHEREAS, Phillips has made numerous presentations concerning said project to various institutions, individuals and groups in the immediate vicinity of the museum beginning in the Summer of 1999; and

WHEREAS, the District of Columbia Historic Preservation Review Board and the Mayor's Agent for D.C. Law 2-144 have approved the Phillips Project; and

WHEREAS, some neighbors have only recently expressed concerns about the Phillips Project and its possible impact upon them; and

WHEREAS, the Cosmos Club, the Indian Embassy and certain individual neighbors have asked the BZA to allow them to participate in BZA Application No. 16618 as parties in opposition

to the Phillips Project; and

WHEREAS, Phillips has a strong preference for the project as presented to the BZA in Application No. 16618 but has also developed an alternative plan for those properties which would not require BZA approval (the "Alternative Phillips Plan"); and

WHEREAS, Alternative Phillips Plan would not provide any opportunity for Phillips to mitigate potential impacts on the neighborhood, including construction of additional off-street parking spaces; and

WHEREAS, Phillips, their neighbors and the ANC desire to enter into an Agreement setting forth certain points of agreement between and among them;

NOW, THEREFORE, in consideration of the premises set forth above, and the covenants and promises set forth below, the parties do hereby covenant and agree as follows:

1. **Catering**. Phillips will require caterers by contract to load and unload in the rear of the Goh Annex. If necessary, employees of Phillips will move their cars out of the area to non-residential parking facilities to facilitate such loading and unloading. Caterers will complete street-level loading by 10:30 p.m. or shall return after 7:00 a.m. on the following day.

2. **Valet Parking**.

(a) Phillips will require with valet parking service providers to use only off-street parking facilities to the extent reasonably available.

(b) Phillips will require that any dinner or reception for more than 70 persons will provide valet parking service.

(c) Invitations to events at the museum will include directions and instructions for access

to off-street parking appropriate to the particular event.

(d) Phillips will make a good faith effort to coordinate valet parking with the Cosmos Club in order to lessen congestion on Hillyer Court and 21st Street.

3. **Buses**.

(a) Phillips, the ANC and interested neighbors will work together to achieve a designated location within the 2100 block of Massachusetts Avenue, N.W., where buses may safely unload and load school children and other visitor groups, provided that elderly and disabled visitors will continue to alight and board on 21st Street.

(b) At such times as elderly and disabled visitors alight and board on 21st Street, Phillips will designate a staff member to be responsible for ensuring that buses depart promptly after unloading and do not block the street and/or idle their engines for significant periods before their groups are ready to board.

(c) Small buses and vans may load and unload on-site.

4. **Auditorium**.

(a) Phillips will limit scheduling events in the auditorium to museum-related education activities or in support of its various programs.

(b) All such evening events shall be scheduled to end by 10:00 p.m.

(c) Phillips will consider reasonable requests for use of the auditorium by neighborhood organizations.

5. **Construction Management**.

(a) Phillips will require its general contractor for the Phillips Project to abide by a construction management plan to be prepared by the project architect.

(b) Phillips will require its contractors for the Phillips Project to provide Metro passes, car-pool or van-pool options for all workers who are on the job for more than 1 week at a time.

(c) Thirty (30) days prior to the start of construction of the Phillips Project, Phillips will add construction schedule/activities category to its website, and will update that information as necessary.

(d) Beginning 30 days prior to the start of construction of the Phillips Project, Phillips will distribute monthly fliers to the residents in the 1600 and 1700 blocks of 21st Street, the 2000 and 2100 blocks of Q and R Streets and Massachusetts Avenue concerning construction activities.

6. **Neighborhood Liaison**. Phillips, the ANC and interested neighbors will establish a TPC Neighborhood Committee to share concerns in an organized manner at regular intervals to ensure that the community knows about upcoming major events at the museum.

7. **Future Expansion**. For a period of 15 years from and after the date of the final order of the BZA approving the Phillips Project in Case No. 16618, Phillips will not expand the museum into any structure in Square 66 (other than 1618-21st Street, N.W.) that was lawfully devoted in its entirety to residential use on that date which is one (1) year prior to the date of any application made by Phillips to the Government of the District of Columbia for approval of a license, permit or other approval to use, alter, improve, or demolish such property.

8. **Duration of Agreement**. The terms and conditions contained in this Agreement shall be binding upon the parties hereto for a period of fifteen (15) years from the date of the final order of the BZA approving the Phillips Project.

9. **Contingent Application**. It is expressly understood and agreed by all interested parties that Phillips shall not be bound by the provisions set forth in Paragraphs numbered 1 through 8 above unless and until each of the following described events shall have first occurred:

(a) The ANC shall (1) adopt a formal resolution in support of the Phillips project and file the same with the BZA prior to December 5, 2000, and (2) shall either support or not object to the financing of the Phillips Project, the Alternative Phillips Plan, or any other project permitted to be undertaken by Phillips under Paragraph 7 above, with revenue bonds issued by the Government of the District of Columbia; and

(b) The Dupont Circle Citizens Association, the Cosmos Club, the Indian Embassy and the individual neighbors represented by Stephen N. Gell, Esq. shall each (1) affirmatively indicate their concurrence herewith, (2) withdraw any request to intervene in BZA Case No. 16618 as a party in opposition to the Phillips Project, (3) file written statements with the BZA prior to December 5, 2000, indicating their support for said project, and (4) either support or not object to the financing of the Phillips Project, the Alternative Phillips Plan, or any other project permitted to be undertaken by Phillips under Paragraph 7 above, with revenue bonds issued by the Government of the District of Columbia ; and

(c) Approval by the BZA of the proposed improvements to and expansion of the museum as presented by Phillips to the Board and without imposition of materially burdensome terms and

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conditions not outlined herein; and

(d) Issuance of all licenses, permits and/or other governmental approvals necessary to carry out the Phillips Project to completion.

IN WITNESS WHEREOF, the parties have hereunto affixed their hands and seals on the ___ date(s) below written.

[Signature Blocks for all Parties]

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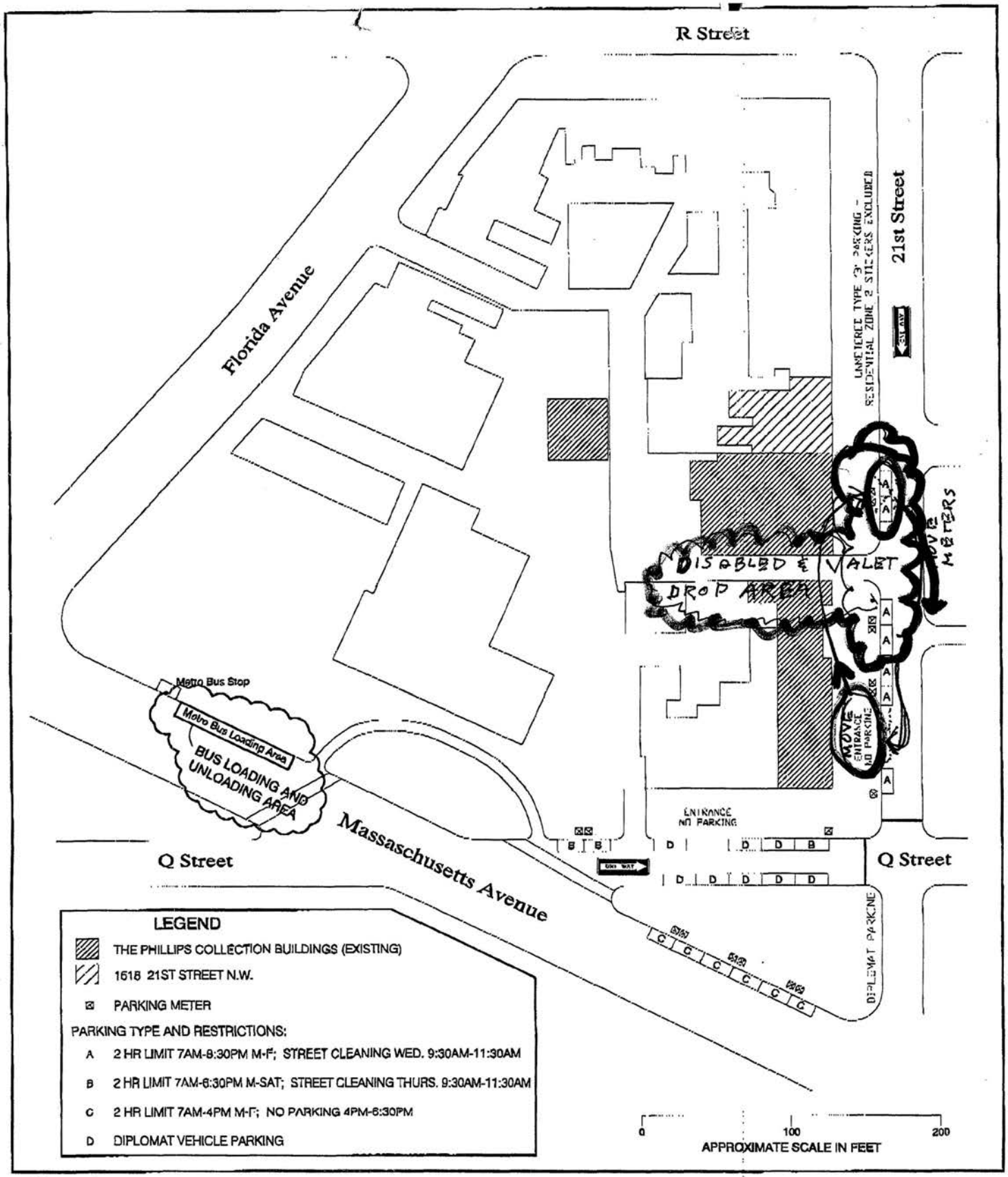


Figure 4
Bus Loading and Unloading Area
Alternative 3

as modified by O.P.

The Phillips Collection

GOROVE/SLADE ASSOCIATES, Inc.
TRANSPORTATION, TRAFFIC, and PARKING CONSULTANTS

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DATE LAST MODIFIED: 12/18/00