Temple Law Offices

1200 G Street, N.W., Suite 370
Washington, D.C. 20005

Telephone (202) 628-1101
Facsimile (202) 628-1149
E-mail: templepc@aol.com

Donald M. Temple ★ ▶

Associate
Jeanett P. Henry ★ ✧

Of Counsel
Everett Bellamy ◀
Warner Session ★

Admitted District of Columbia Bar ★
Admitted Maryland Bar ✧
Admitted Ohio Bar ◀
Admitted Pennsylvania Bar ▶

AMENDED

DC OFFICE OF ZONING
2003 JUL 22 AM 9:04

BY HAND-DELIVERY

July 22, 2003

Geoffrey H. Griffis, Chairperson
DC Office of Zoning
Board of Zoning Adjustment
441 4th Street, NW Suite 210-S
Washington, DC 20001

Re: BZA Appeal No. 16998

Dear Mr. Griffis:

Appellant hereby submits fourteen (14) copies of an amended version of Exhibit 35. The DC Halfway Houses vs. The DC Jail comparison variables chart in the previous Exhibit 35 is contained in the new attached Exhibit 35 and can be discarded.

Respectfully submitted,

Donald M. Temple

Cc: Joseph A. Camardo, Jr. Esq., via fax
Bennett Rushkoff, Esq., via fax
Shaw Whittaker, Esq., via fax

BZA
Case No. 16998
Exhibit No. 78

Board of Zoning Adjustment
District of Columbia
CASE NO. 16998
EXHIBIT NO. 78

DC HALFWAY HOUSES VS. THE DC JAIL

Comparison Variables	Bannum, Inc.	Bureau of Rehab	Effect	Hope Village, Inc.	Washington Halfway House for Women	DC Jail
1. Other Common Names						
a. Halfway House	✓	✓	✓	✓	✓	✗
b. Community Correctional Center	✓	✓	✓	✓	✓	✗
c. CBRF	✓	✓	✓	✓	✓	✗
d. Adult Rehabilitation Home	✓	✓	✓	✓	✓	✗
2. Usage						
a. Contract to operate a "CCC"	✓	✓	✓	✓	✓	✗
b. Work Release Program	✓	✓	✓	✓	✓	✗
c. 40 hour per week job requirement within specified period	✓	✓	✓	✓	✓	✗
d. Subsistence payment @ 25% of gross income	✓	✓	✓	✓	✓	✗
e. Weekend passes	✓	✓	✓	✓	✓	✗
f. Furlough	✓	✓	✓	✓	✓	✗
g. Home inspection to pre-determined release address	✓	✓	✓	✓	✓	✗
3. Security						
a. Armed Guards Disallowed	✓	✓	✓	✓	✓	✗
b. Perimeter Fencing Disallowed	✓	✓	✓	✓	✓	✗
c. Unlockable Doors Disallowed	✓	✓	✓	✓	✓	✗
d. Physical Restraints Disallowed	✓	✓	✓	✓	✓	✗
e. Sign In/Sign Out Requirement	✓	✓	✓	✓	✓	✗
4. Referral and Arrival						
a. Acceptance of application by facility	✓	✓	✓	✓	✓	✗
b. Unescorted public transportion with arrival date	✓	✓	✓	✓	✓	✗
5. BZA Process						
a. Filing of application and payment of fees		✓	✓	✓	✓	✗
b. Notification of all citizens within 200 feet		✓	✓	✓	✓	✗
c. Posting of notice hearing on building for # days with verification of posting		✓	✓	✓	✓	✗
d. Planning Review		✓	✓	✓	✓	✗
e. Impact Statement		✓	✓	✓	✓	✗
f. MPD Review		✓	✓	✓	✓	✗
g. Community Support (BZA and BOP Requirement		✓	✓	✓	✓	✗
- Ranking Elected Official (Councilmember)		✓	✓	✓	✓	✗
- School Board Member		✓	✓	✓	✓	✗
- ANC		✓	✓	✓	✓	✗

* (✓) denotes that the comparison variable is applicable to the instant facility

** (✗) denotes that the comparison variable is not applicable to the instant facility