PRE-HEARING STATEMENT

On behalf of

The District of Columbia through

Safe Shores – D.C. Children's Advocacy Center

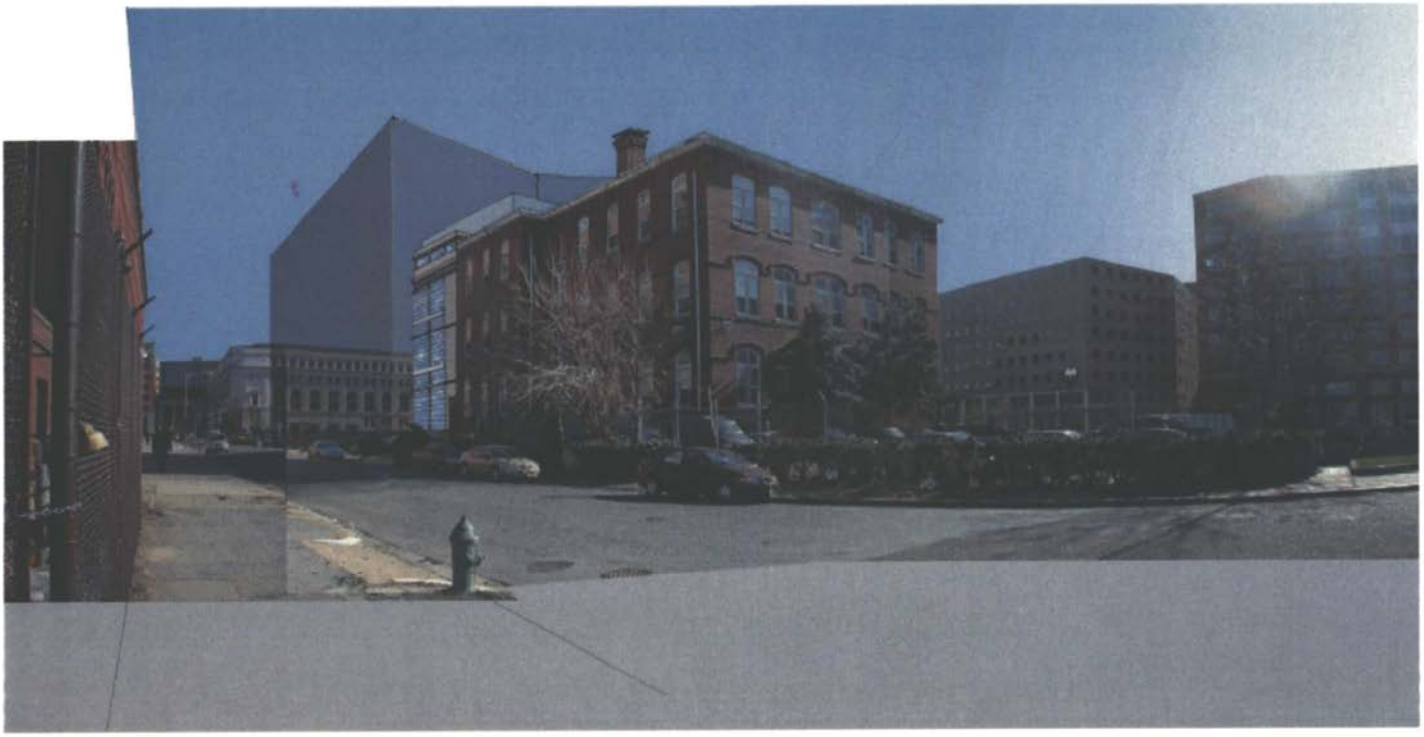
And

The National Children's Alliance

For

A SPECIAL EXCEPTION
at
65 Massachusetts Avenue, N.W.

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BZA APPLICATION NO. 17016

BZA
Case No. 17016
Exhibit No. 20

Board of Zoning Adjustment
District of Columbia
CASE NO. 17016
EXHIBIT NO. 20

BEFORE THE BOARD OF ZONING ADJUSTMENT
OF THE DISTRICT OF COLUMBIA

Application of:
District of Columbia through
Safe Shores – D.C. Children's Advocacy Center
and the National Children's Alliance

BZA Application No.: 17016
Hearing Date: May 20, 2003

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STATEMENT OF THE APPLICANT

I.
Introduction

This is an application pursuant to 11 D.C.M.R. §§ 3103 &3104. The District of Columbia is the owner of the property at Square 625, Lot 806, which property has a premises address of 65 Massachusetts Avenue, N.W. (the "Property"). The District has entered into lease negotiations with Safe Shores – The D.C. Children's Advocacy Center ("Safe Shores") for the use of the property for the District's Children's Advocacy Center. The National Children's Alliance will also occupy a portion of the Property (Safe Shores and the National Children's Alliance are hereinafter referred to collectively as the "Applicant"). To permit the proposed use and occupancy of the Property, the Applicant seeks special exceptions pursuant to sections 441 and 774.2, from the roof structure and rear yard requirements, respectively, of the zoning regulations, as well as an area variance from the penthouse setback requirements of section 770.6 of the zoning regulations. The Applicant submits that it meets the criteria for the requested relief.

II.
Jurisdiction of the Board

The Board has jurisdiction to grant the relief requested pursuant to 11 D.C.M.R. §§ 3103.2 & 3104.1.

III.
Background Information

A. The Property and Surrounding Neighborhood.

1. The Property.

The Property is located in Square 625 and is located immediately across G Street, N.W. from the main office of the United States Government Printing Office. The site, which is irregularly shaped, contains 12,717 square feet of land. The Property is bordered by 1st Street to the west, G Street to the north and Massachusetts Avenue to the south.

2. The Gales School.

The Property is presently improved with the historic Gales School, which was listed on the District Inventory of Historic Sites on May 23, 2002. Built in 1881, the Gales School was designed by Edward Clark, then Architect of the Capitol. The Gales School is one of the last remnants of the thriving blue-collar residential neighborhood that existed in the area around Massachusetts and North Capitol Streets in the latter part of the 19th Century and the first quarter of the 20th Century. The building is named after Joseph Gales, Jr., the eighth mayor of Washington City and publisher of the National Intelligencer. The school was closed in 1944 and has been used since then by the War Hospitality Committee during World War II, the District of Columbia Department of Health, the District's Rent Control Board and, most recently, by the Transportation Systems Administration of the District of Columbia Department of Public Works. Although it is questionable whether, given

the present condition of the Gales School, the building is habitable; the District has used the first floor of the building for hypothermia housing.[1]

There has been fire damage to the roof and attic level of the Gales School. The initial fire destroyed large sections of the roof and interior. Unfortunately, since the initial fire years ago, the roof remained open to the elements, resulting in continued and extensive water damage to the interior of the building. The top floors have been closed off to avoid potential catastrophes. Currently, the floor and ceiling assemblies are unsafe and the interior walls evidence severe water damage. *See* Exhibit C, page A3. Additionally, although not verified as a condition connected with the roof damage, the existing basement level is filled with water, with several inches of standing water in large areas.

3. The Surrounding Neighborhood.

Although once a residential neighborhood, the area surrounding the Property is now exclusively commercial, including private and government uses. Georgetown Law School is located to the southwest of the Property, the Bureau of Labor Statistics and U.S. Postal Museum to the east, and the Army Corps of Engineers to the south. Union Station is just two blocks to the east of the Property. Parking lots exist to the west, south and north, and a triangular park exists to the southeast.

The eastern edge of the Property abuts Lot 841, which is under the control of the National Capitol Revitalization Corporation. Lot 841 is the subject of a proposed project, known as Republic Square, which will consist of two, multi-story office buildings. The southeastern corner of Square 625 is occupied by the National Guard Association Building.

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[1] The Applicant has received assurances from Carolyn Graham's office (Deputy Mayor Children, Youth, Families and Elders) that the District dos have plans to find an alternative, safer building for hypothermia housing.

Of particular importance to the District's decision to use the Property for its Children's Advocacy Center is the Property's close proximity to the District of Columbia courthouses.

B. The Applicant.

1. Safe Shores.

Safe Shores is a non-profit, private-public partnership established to provide a coordinated and child-friendly approach to the investigation and prosecution of civil and criminal child abuse cases in the District of Columbia. The goals of Safe Shores is to:

a. Minimize the trauma experienced by children and adolescents who have been identified as victims of sexual or physical abuse;
b. Improve the investigation and prosecution of sexual and physical abuse cases from the point of intervention through to treatment and healing;
c. Promote inter-agency collaboration for effective decision making and management of sexual and physical abuse cases;
d. Prevent further and/or future abuse of child victims; and
e. Provide training for professionals in the field of investigation, prosecution and provision of services for sexually and physically abused children, adolescents and their non-offending caretakers.

Safe Shores currently has nine (9) full-time, two (2) part-time, three (3) co-located and three (3) seasonal staff at their present location. Safe Shores works in tandem with a multidisciplinary team ("MDT") of law enforcement, legal, social service and medical agencies. The MDT is comprised of the United States Attorney's Office for the District of Columbia (Domestic Violence and Sex Offense Unit and the Victim/Witness Unit), the Office of the Corporation Counsel (Abuse and Neglect Section and the Juvenile Section), the Child and Family Services Agency (Intake Unit), and Children's National Medical Center (the Freddie Mac Child and Adolescent Protection Center). Safe Shores serves in a coordinating capacity with these Team Members in an effort to ensure that all

agencies are working individually and collaboratively to provide the most comprehensive and child-friendly services for child and adolescent victims of abuse and neglect in the District of Columbia.

The importance of the services provided by Safe Shores, as well as the manner in which they are delivered, cannot be understated. The Safe Shores facility is designed to provide a warm and welcoming place where children and adolescents can feel safe and supported while waiting for forensic interviews, therapy, court appearances or placement solutions. To further this end, the Safe Shores' therapy program is designed to provide assessment, treatment and referral services, and the therapist also provides clinical insight to caretakers and professionals and serves as a community resource in the field of child abuse. Therapy sessions are offered free of charge at the Safe Shores.

Safe Shores also provides victim services to serve the immediate emergency needs of children and adolescents in crisis. These services are provided to children already involved in the social service system and who have been referred by a Team Member Agency. Services include the Clothes Closet, Meal Fund and the Emergency Child & Adolescent Victim Crisis Fund; the latter providing assistance with transportation costs, school supplies, school uniforms, summer camp fees and other specific needs to child victims.

2. The National Children's Alliance.

Founded in 1987 by Congressman Bud Cramer, then District Attorney of Madison County Alabama, the National Children's Alliance ("NCA") is a non-profit organization whose mission is to provide training, technical assistance and networking opportunities to communities seeking to plan, establish and improve children's advocacy centers. NCA was founded in response to the needs of a growing number of facility-based child abuse intervention programs and the demand for guidance from grassroots organizations working with child victims. Today, NCA is a membership

organization providing services to Children's Advocacy Centers, multidisciplinary teams, and professionals across the country.

NCA provides the blueprint for child advocacy centers, including Safe Shores. As indicated above, child advocacy centers are intended to offer a better way of serving abused children through a comprehensive approach to services for victims and their families. Children's Advocacy Centers stress coordination of investigation and intervention services by bringing together professionals and agencies as a multidisciplinary team to create a child-focused approach to child abuse cases. The goal is to ensure that children are not revictimized by the very system designed to protect them.

3. Use of the Building.

As illustrated below concerning the percentage occupancy of the building, District agencies that are part of the MDT will comprise approximately sixty-seven percent (67%) of the population in the proposed building. The CAC and the NCA will make up twenty-five percent (25%) of the building population, with medical personnel and the US Attorneys' office equaling approximately eight percent (8%).

Breakdown of Building Occupation:

DC CAC	16% (Safe Shores)	
NCA	9%	
DC AGENCIES:	67%	
DCMPD		41%
DC Social Workers		24%
Corporation Council		2%
FEDERAL/Medical:	8%	
U.S. Attorney's Office		2%
Children's Hospital		6%

C. The Proposed Development.

The current location for Safe Shores, 300 E Street, N.W., is insufficient to accommodate the number of children served by the center and the range of programs ideally provided by an assessment center for abused and neglected children. Because of the inadequacy of it existing space and the resulting inability to serve a greater population of children in need of its services, commencing in 1998, Safe Shores, with the assistance of the Deputy Mayor for Children, Youth, Families and Elders, began to look for more suitable space. Because of the special program needs for the center, renting space within larger office or commercial buildings was not a feasible option. For example, so as to protect the identity of the children, children entering the center must have a separate entrance. The entrance for children must be scaled to their size and must create a child friendly environment. In maintaining a child friendly atmosphere, a separate entrance is required for police and any adults taken into custody. These requirements do not easily fit into an office building with a single lobby.

As indicated above, a second, crucial requirement is the proximity of the center to the District courthouses, as it is desirable to have the center within walking distance of the courthouses.

After a lengthy search for a new home, the Gales School was been identified as an ideal location for the District's Assessment Center. The proposal to use the Gales School for the District's Assessment Center was brought by the Deputy Mayor for Children, Youth, Families and Elders. The Property provides more space to operate the Center's critical programs and is ideally located close to the District of Columbia courts that have jurisdiction over juvenile abuse and neglect cases, as well as to the various law enforcement and social service agencies involved in the handling of juvenile abuse and neglect cases.

Great care has been taken by the Applicant to respect the historic fabric of the Gales School. To this end, extensive efforts have been made to maximize the efficiency of the proposed building and Safe Shores has reduced the proposed program space within the existing structure and addition by almost fifty percent (50%). Additionally, the Applicant is proposing to add two (2) cellars and one basement to the building to accommodate its program needs. These below-grade spaces will be utilized for training for Safe Shores, as well as for members of NCA on a national and international basis. Finally, although not required, Safe Shores is going to great lengths to preserve the interior layout of the Gales School. For example, the interior floors will be replaced exactly where they are currently located in order to bring the building up to code.[2] Thus, the window lines will be as they were when the Gales School was used as a school house.

Because of the historic nature of the Property and, more specifically, the restrictions imposed by the DC Historic Preservation Review Board ("HPRB"), as well as the location of the Gales School on the Property, the only feasible location for the addition to the Gales School is in the rear yard, thus necessitating a special exception from the rear yard requirements of the zoning regulations. A requirement of the HPRB is that the Applicant push the penthouse structure as far back towards the rear addition as possible. Compliance with this restriction results in the need for a special exception from the zoning regulations requirement that the walls of the enclosing structure will not rise to one height, as well as a variance from the roof structure setback requirements of the zoning regulations.

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[2] Rather than replacing the floors in their current location, Safe Shores could have put additional structures below the existing floors to bring them up to code. However, this method would have resulted in covering the window transoms by two or more feet.

D. Zoning.

The Property is zoned HR/C-3-C. The C-3-C zone is designed to permit compact medium-high density development, including office, retail, housing, and mixed use development. 11 D.C.M.R. § 740.8. The Hotel-Residential Incentive (HR) District is designed to encourage construction of hotels and apartment houses to further the goals of providing sufficient hotel rooms within a convenient distance of the Convention Center. 11 D.C.M.R. § 1100 *et seq.*

As previously mentioned, the surrounding neighborhood is predominantly commercial, consisting of commercial and government uses. As such, this small site is not conducive to residential and/or hotel use. Furthermore, the use proposed by the Applicant, an office use for social services, is allowed as a matter of right in the HR/C-3-C zone district.

E. Comprehensive Plan.

Under the Comprehensive Plan regarding human services, it is the goal of the District to "ensure a broad range of community-based human services for those in need." 10 D.C.M.R. § 1001.1. To further this goal, the Comprehensive Plan provides that:

> It is the human services delivery system's objective to maintain and improve the human services delivery system in the District[,] which has been established to facilitate the maintenance and improvement of health and well-being.

10 D.C.M.R. § 1002.2. It is the policy of the Comprehensive Plan to "coordinate the design and implementation of all District human service programs with human service providers" and to "link district government human services programs more effectively with federally mandated and funded human service programs to obtain additional federal funding". 10 D.C.M.R. § 1002.2(k)&(l).

Safe Shores' proposed use of the Gales School furthers these objectives of the Comprehensive Plan by providing the MDTs under one roof. The inclusion of NCA will help bring additional notoriety and funding to the District's child advocacy center.

The Comprehensive Plan notes that there is a large number of under-utilized or empty schools in the west end of Ward 6. 10 D.C.M.R. § 1732.9. With regard to such schools, the Plan recommends that the District should require the use of these facilities in conformity with the surrounding predominant land use. Again, given the predominant surrounding commercial use, the proposed use of the Gales School is consistent with and furthers the goals of the Comprehensive Plan for Ward 6.

IV.
Special Exception Considerations

A. Criteria for Special Exceptions.

As for the criteria for a special exception, 11 D.C.M.R. § 3104.1 permits the Board to grant special exceptions, pursuant to the following:

> Pursuant to authority contained in the Zoning Act of June 20, 1938 (52 Stat. 797), as amended, the Board is authorized to grant special exceptions, as provided in this title where, in the judgment of the Board, those special exceptions will be in harmony with the general purpose and intent of the Zoning Regulations and Maps and will not tend to affect adversely the use of neighboring property in accordance with the Zoning Regulations and Zoning Maps, subject in each case to the special conditions specified in this title...

In short, the Board is empowered to grant a special exception where it finds

(1) The proposed use is in harmony with the Zone Plan and Zone Maps; and
(2) The proposed use is not likely to adversely affect the use of neighboring property.

The Board's discretion in reviewing an application for a special exception is limited to a determination of whether the Applicant has complied with requirements of the section. If the Applicant meets this burden, the Board ordinarily must grant the application. First Baptist Church of Washington v. District of Columbia Board of Zoning Adjustment, 432 A.2d 695, 698 (D.C. 1981); Stewart v. District of Columbia Board of Zoning Adjustment, 305 A.2d 516, 518 (D.C. 1973).

1. Special Exception From the Rear Yard requirements.

Generally, a rear yard of two and a half (2.5) inches per foot of vertical distance from the mean finished grade at the middle of the rear of the structure to the highest point of the main roof or parapet wall is required. 11 D.C.M.R. §774.1. In the instant matter, the required rear yard is thirteen feet.

The BZA may waive the rear yard requirements, so long as the requirements of the following sections 774.3 through 774.5 are met. These sections require that:

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

Based on the attached information, and the testimony and evidence which will be presented at the public hearing, the Applicant has satisfied these requirements.

OUTLINE OF TESTIMONY OF ARCHITECTS

I. Introduction

A. Qualifications
B. Summary of Project

II. Special Exceptions

A. Special Exception from Rear Yard and Penthouse Structure Requirements.

1. Criteria for special exception from rear yard requirements
   a. Distance between windows of proposed addition and facing windows of proposed development at Republic Square provide ample light & air
   b. Sight lines between windows proposed addition and facing windows of proposed development at Republic Square provide for privacy of occupants
      - No residential uses proposed for Property or Republic Square
   c. Alley easement
   d. No parking/loading requirements

2. Criteria for special exception from roof structure requirements requiring penthouse enclosure walls to be of equal height.
   a. Historic nature of property and restrictions imposed by HPRB prevent compliance with section 441.4 of the zoning regulations
   b. Proposed enclosing walls consistent with the purposes of section 411 *et seq.*
   c. Proposed penthouse enclosure does not impede light and air to surrounding properties.

B. Special Exceptions are Consistent with the Zone Plan and Maps and do not Adversely Affect the Neighborhood.

III. Consistency with requirements for area variances

A. Uniqueness / Practical Difficulty

1. Shape of Property
2. Location of existing improvements on the Property
3. Historic nature of Property
4. HPRB restrictions on development and design
5. Proximity of Property to District of Columbia Courthouses

B. Consistency with Zone Plan

C. Lack of Adverse Impact on Neighborhood

a. The Proposed Plans Provide for Adequate Spacing Between Buildings to Provide Light and Air and to Protect the Privacy of Building Occupants.

The adjoining lot to the Property is currently vacant. However, a PUD has been approved for Lot 841, Republic Square. The current proposed plans for Republic Square depict a twenty foot (20') alley separating the Republic Square property from the Gales School. *See* Exhibit D page A17. Additionally, the National Capitol Planning Commission, which currently owns the Republic Square, has agreed to grant an easement for the maintenance of the twenty foot (20') alley. Consequently, adequate space is provided between buildings to provide adequate light and to protect the privacy of the occupants.

As to sight-lines into habitable rooms (section 774.4), this is not a concern as there will be no residential use in either the Gales School or the Proposed building for the Republic Square.

b. Parking Need Not be Provided.

As a landmark property, the Gales School need not provide parking. 11 D.C.M.R. § 2100.5. Regardless, the Applicant is seeking to provide four (4) on-site parking spaces at the Property. Additionally, there is ample on-street parking, as well as several public parking facilities, in the surrounding neighborhood.

2. Special Exception from Roof Structure Height Requirements.

Section 441.4, made applicable to the Property by way of section 777.1 of the zoning regulations, requires that "enclosing walls from roof level shall be of equal height, and shall rise vertically to a roof. . ." Because of the historic preservation requirements, the Applicant is required to place the penthouse as far back towards the rear addition as possible. Additionally, the portion of the penthouse surrounding the elevator core is required to be lower in height than the portion

enclosing the mechanical equipment, resulting in the need for the special exception from the requirements of section 441.4.

Section 411.11 provides that:

> Where impracticable because of operating difficulties, size of building lot, or other conditions relating to the building or surrounding area that would tend to make full compliance unduly restrictive, prohibitively costly, or unreasonable, the Board of Zoning Adjustment shall be empowered to approve the location, design, number, and all other aspects of such structure regulated under §§411.3 through 411.6, even if such structures do not meet the normal setback requirements of §§400.7, 530.5, 630.5, 770.7, 840.3, or 930.3, when applicable, and to approve the material of enclosing construction used if not in accordance with §§411.3 and 411.5; Provided, that the intent and purpose of this chapter and this title shall not be materially impaired by the structure, and the light and air of adjacent buildings shall not be affected adversely.

The penthouse structure walls cannot be of equal height because of the restrictions resulting from the historic nature of the Property. Because of the height of the building in comparison to the proposed height for the Republic Square PUD, there will be no adverse affect on the light and air provided to that property. Moreover, the special exception from the requirements of section 411.4 will not impair the purpose and intent of the zoning regulations.[3] In fact, the proposed design of the penthouse structure is more aesthetic than what would result from compliance with section 411.4.

B. The Special Exceptions Will Be in Harmony with the General Purpose and Intent of the Zone Plan and Maps and The Relief Will Not Adversely Affect the Neighborhood.

The Property and surrounding neighborhood are commercially zoned and, consistent with this zoning, the predominant use in the immediate area is office, including private and governmental office use. The project has been designed so as to provide adequate light, air and privacy both to the

[3] As currently design, a special exception is not necessary, as the area of the penthouse covering the elevator shaft is less than four feet (4'). *See* 11 D.C.M.R. § 411.17. However, as this height is subject to slight change and in abundance of caution, the Applicant has requested this special exception in its request for relief.

occupants of the Gales School, as well as occupants of the proposed PUD at the Republic Square site. With regard to the roof structure, it has been designed so as to have the least visual impact on the historic Gales School. Given these factors, the requested special exceptions are consistent with and will not adversely affect the surrounding neighborhood.

V.
Area Variance Considerations

The standard for obtaining an area variance is well settled. In the leading case of *Palmer v. Board of Zoning Adjustment*, 287 A.2d 535 (D.C. 1972), the Court interpreted D.C. Code, §§ 5-420, 5-424(g)(3) and the corresponding provision of the Zoning Regulations, 11 D.C.M.R. § 3103.2, which permits the Board to grant variances, pursuant to the following:

> Where, by reason of exceptional narrowness, shallowness or shape of a specific piece of property at the time of the original adoption of the regulations or by reason of exceptional topographical conditions or other extraordinary or exceptional situation or condition of a specific piece of property, the strict application of any regulation adopted under this Act would result in peculiar and exceptional practical difficulties to or exceptional and undue hardship upon the owner of such property, to authorize, upon an appeal relating to such property, a variance from such strict application so as to relieve such difficulties or hardship, provided such relief can be granted without substantial determent to the public good and without substantially impairing the intent, purpose, and integrity of the zoning plan as embodied in the zoning regulations and map.

The above regulation sets up separate statutory requisites to the granting of variances, i.e., a showing of "practical difficulties" or "undue hardship". The court adopted the dichotomy recognized in other jurisdictions between area variances and use variances, applying the statutory requisite of "practical difficulties" to a showing of the former, and applying the separate statutory requisite of "undue hardship" to a showing of the latter. *Id.* at 541. Because "an area variance, relating to restrictions such as side yard, rear yard, frontage, set-back or minimum lot requirements,

does not alter the character of the zoned district, whereas a use variance seeks a use ordinarily prohibited in the particular district", the court held that a "more stringent showing is warranted with respect to the more drastic relief inherent in a use variance". *Id.* at 541. In short, the Board is empowered to grant an area variance where it finds three conditions:

> (1) The property is unique because, *inter alia*, of its size, shape or topography;
>
> (2) The owner would encounter practical difficulties if the zoning regulations were strictly applied;
>
> (3) The variance would not cause substantial detriment to the public good and would not substantially impair the intent, purpose and integrity of the zoning plan.

Roumel v. District of Columbia Bd. of Zoning, 417 A.2d 405, 408 (D.C. 1980); *see also Association For The Preservation Of 1700 Block Of N Street, N.W. v. Board of Zoning Adjustment*, 384 A.2d 674, 678 (D.C. 1978)(the applicant must demonstrate that compliance with the area restriction is unduly burdensome and the practical difficulties are unique to the property).

Reviewing the criteria for an area variance recently, the Court, in *Capital Hill Restoration Society, Inc. v. District of Columbia Bd. of Zoning Adjustment*, 534 A.2d 939, 941-942 (D.C. 1987), stated that the

> threshold requirement to show that the property is unique with respect to the hardship or difficulty asserted as grounds for the variance means the property owner must present proof that "the circumstances which create the hardship *uniquely* affect the *petitioner's property* * * * ." *Taylor, supra* note 6, 308 A.2d at 234 (emphasis in original).

Id.; see also Russell v. Board of Zoning Adjustment, supra, 402 A.2d at 1235 (the requirement that the practical difficulty be caused by the uniqueness of the property "insures relief for problems peculiarly related to the * * * land or structure, and not shared by other property in the neighborhood, thus avoiding a de facto amendment of zoning laws.").

In other words, the Applicant must demonstrate that compliance with the area restrictions is unduly burdensome and the practical difficulties are unique to the site. In finding an extraordinary or exceptional condition, the Board may rely upon a confluence of factors.

A. Uniqueness and Practical Difficulty.

1. The Shape, Location and Improvements to the Property Make it Unique.

In this case, the Property is indeed unique, as that term has been applied to area variances, and a practical difficulty does result from the strict application of the Zoning Regulations. Moreover, the requested variance can be accurately described as minimal.

The first aspect of uniqueness lies in the odd pentagonal shape of the Property. Adding to the uniqueness of the Property is the location of the Gales School on the Property, as well as the status of the Gales School as a historic landmark. *See Capitol Hill Restoration Society, Inc. v. Board of Zoning Adjustment*, 534 A.2d 939, 942 (D.C. 1987)(a condition inherent in the structures built upon the land itself may serve to satisfy an applicant's burden of demonstrating uniqueness).

The Gales School is placed on the property such that the only options for additions to the school are through adding additional floors (i.e., increasing the height of the building) or constructing an addition in the rear yard. Because of the historic nature of the school, adding to the height of the building is not an option,[4] leaving only the possibility of an addition in the rear yard.

[4] Because of the inability to add additional floors to the Gales School, the Applicant is only able to develop 3.0 of the allowed 6.5 FAR, or less than half the available FAR.

Also contributing to the uniqueness of the Property is the Property's location in proximity to the District courthouses, the importance of the services provided by Safe Shores and the fact that Safe Shores is a non-profit organization. The Board was faced with this precise situation in the underlying case in *Monaco v. Board of Zoning Adjustment*, 407 A.2d 1091 (D.C. 1979). In *Monaco*, the Republican National Committee ("RNC") sought a use and area variance in order to extend its offices located in an R-4 district bordering the Capitol grounds. In determining that the property was unique, the Court noted that the site was "*uniquely suitable* for [the headquarters of the RNC] because of the surrounding use, the Capitol." 407 A.2d at 1099 (emphasis added). The Court explained that:

> While a commercial user before the BZA might not be able to establish uniqueness in a particular site's exceptional profit making potential, we consider that the BZA may be more flexible when it assesses a non-profit organization which is a well established element of our governmental system. As Professor Anderson has observed, public need for the use is an important factor in granting or denying a variance and "the apparently objective standards of the enabling acts are applied differently to the several kinds of uses . . ."

Monaco, 407 A.2d at 1090.

As in *Monaco*, the given the Property's location in proximity of the District courthouses, the Property is uniquely suitable for Safe Shore's use. Given that Safe Shore's is a non-profit organization providing a much needed public service for the residents of the District of Columbia, a more flexible standard may be applied with regard to both the uniqueness of the Property, as well as the practical difficulties resulting from that uniqueness. *Id.* Also of particular importance is the fact that District agencies will be the predominant occupant of the proposed building.

2. The Uniqueness of the Property Results in Practical Difficulties if the Zoning Regulations Are Strictly Applied.

The exceptional and unique condition presented by the shape of the Property, the location of the improvements on the Property, the historic nature of the Property and the Property's proximity to the courthouses, has created practical difficulty in designing an efficient building which fully complies with the Zoning Regulations. In other words, strict application of the Zoning Regulations is unduly burdensome due to the uniqueness of the Property. Safe Shores has been searching for a suitable a site for almost five (5) years. Given the lack of available vacant property within proximity of the courthouses, strict application of the zoning regulations would result in practical difficulties to Safe Shores and the District of Columbia.

As indicated above, because of the historic nature of the Property and the location of the Gales School on the Property, the only feasible location for the addition to the Gales School is in the rear yard. As a requirement of the HPRB, the Applicant must push the penthouse structure as far back towards the rear addition as possible. Compliance with this requirement results in the need requested area variance from the roof structure setback requirements of the zoning regulations.

The requested variance is minor. Given the eleven foot (11') height of the penthouse, a corresponding eleven foot (11') setback is required. The proposed setback is six to eight feet (6-8'), resulting in a deviation of twenty to forty percent (20%-40%). Because the Applicant is continuing to work with HPRB regarding the penthouse, the Applicant is seeking flexibility from the Board regarding the setback requirements. As the proposed PUD for Republic Square is setback from the Property line, this deviation will not adversely affect the light and air to that development.

This is not a situation where the applicant has sought to manufacture unique conditions. To be certain, the unique conditions of the Property and historic preservation requirements make it

physically impossible to design a building which fully complies with the Zoning Regulations. Those conditions, namely the shape of the Property, the location of the improvements on the property and the historic nature of the Gales School, existed prior to the time the Property selected for use by Safe Shores and are the primary reason why the project cannot be constructed without resort to the Board.

3. The Proposed Project Will Not Have an Adverse Impact on the Surrounding Neighborhood.

The proposed project will not substantially impair the intent, purpose and integrity of the zone plan. To the contrary, the requested relief will allow the adaptive reuse of the historic Gales School in a manner which furthers the goals of both the Zoning Regulations, as well as the Comprehensive Plan. Thus, not only is the requested relief consistent with the intent, purpose and integrity of the zone plan, the proposed development will benefit the District of Columbia by providing a much needed social service.

VI.
Exhibits In Support of the Application

Exhibit A: Self -Certification Form

Exhibit B: Site Map

Exhibit C: Building Plat

Exhibit D: Architectural Plans

Exhibit E: Testimony of Architect

VII.
Witnesses

A. Jennifer Massengale
Acting Executive Director
Safe Shores

B. Nancy A. Chandler
Executive Director
National Children's Alliance

C. Paul Davey & Elba Morales
Studio Z
Hickok Warner Cole Architects

VIII.
Conclusion

For the above reasons, the Applicant respectfully requests that the Board grant the relief sought. Given the lack of adverse impact on the surrounding area, the Applicant requests a bench decision, if the Board feels such a decision is justified.

Respectfully submitted,

ROBINS, KAPLAN, MILLER & CIRESI, L.L.P.



Richard B. Nettler



Jeannine Rustad Zigner

1801 K Street, N.W.
Suite 1200
Washington, D.C. 20006
(202) 775-0725

A

Form 135 – Side 1
(Revised 03/15/02)

Case No. 17016

ZONING SELF-CERTIFICATION FORM

Project Address(es)	Square	Lot(s)	Zone District(s)	ANC(s)/Single Member District(s)
65 Massachusetts Avenue, N.W.	625	806	HR/C-3-C	6C01

CERTIFICATION

The undersigned agent hereby certifies that the following zoning relief is required from the Board of Zoning Adjustment in this matter pursuant to:

Relief Sought	☐ §3103.2 - Use Variance	☒ §3103.2 - Area Variance	☒ §3104.1-Special Exception
Pursuant to Subsections		770.6	411 and 774.2

Pursuant to 11 DCMR §3113.2, the undersigned agent certifies that:

(1) the agent is duly licensed to practice law or architecture in the District of Columbia;
(2) the agent is currently in good standing and otherwise entitled to practice law or architecture in the District of Columbia; and
(3) the applicant is entitled to apply for the variance or special exception sought for the reasons stated in the application.

The undersigned agent and owner acknowledge that they are assuming the risk that the owner may require additional or different zoning relief from that which is self-certified in order to obtain, for the above-referenced project, any building permit, certificate of occupancy, or other administrative determination based upon the Zoning Regulations and Map. Any approval of the application by the Board of Zoning Adjustment does not constitute a Board finding that the relief sought is the relief required to obtain such permit, certification, or determination.

The undersigned agent and owner further acknowledge that any person aggrieved by the issuance of any permit, certificate, or determination for which the requested zoning relief is a prerequisite may appeal that permit, certificate, or determination on the grounds that additional or different zoning relief is required.

The undersigned agent and owner hereby hold the District of Columbia Office of Zoning and Department of Consumer and Regulatory Affairs harmless from any liability for failure of the undersigned to seek complete and proper zoning relief from the Board of Zoning Adjustment.

The undersigned owner hereby authorizes the undersigned agent to act on the owner's behalf in this matter.

Owner's Signature	Owner's Name (Please Print)
	Safe Shores (contract lessee) by Jennifer Massengale, Esq., Acting Exec. Director
Agent's Signature	**Agent's Name (Please Print)**
	Michael E. Hickok

Date	03/04/2003	D.C. Bar No.		or	Architect Registration No.	3217

OFFICE OF ZONING DETERMINATION

(DCMR Title 11 §3113.2)

Based upon review of the application and self-certification, this application is

☐	Accepted for filing.
☐	Referred to the Office of the Zoning Administrator, Department of Consumer and Regulatory Affairs, for determination of proper zoning relief required.
☐	Rejected for failure to comply with the provisions of ☐ DCMR Title 11 §3113.2; or ☐ DCMR Title 11 Zoning Regulations. Explanation _____

Signature _____ Date _____

Jerrily R. Kress, FAIA – Director
District of Columbia Office of Zoning

441 4th Street, N.W. Ste. 210-S, Washington, D.C. 20001
(202) 727-6311 * (202) 727-6072 fax * www.dcoz.dc.gov

Form 135 – Side 1 (Revised 03/15/02)	Case No. _____

ZONING SELF-CERTIFICATION FORM

65 Massachusetts Avenue, N.W.	625	806	HR/C-3-C	6C01

CERTIFICATION

The undersigned agent hereby certifies that the following zoning relief is required from the Board of Zoning Adjustment in this matter pursuant to:

Relief Sought	☐	☒	☒
Pursuant to Subsections		770.6	411 and 774.2

Pursuant to 11 DCMR §3113.2, the undersigned agent certifies that:

(1) the agent is duly licensed to practice law or architecture in the District of Columbia;
(2) the agent is currently in good standing and otherwise entitled to practice law or architecture in the District of Columbia; and
(3) the applicant is entitled to apply for the variance or special exception sought for the reasons stated in the application.

The undersigned agent and owner acknowledge that they are assuming the risk that the owner may require additional or different zoning relief from that which is self-certified in order to obtain, for the above-referenced project, any building permit, certificate of occupancy, or other administrative determination based upon the Zoning Regulations and Map. Any approval of the application by the Board of Zoning Adjustment does not constitute a Board finding that the relief sought is the relief required to obtain such permit, certification, or determination.

The undersigned agent and owner further acknowledge that any person aggrieved by the issuance of any permit, certificate, or determination for which the requested zoning relief is a prerequisite may appeal that permit, certificate, or determination on the grounds that additional or different zoning relief is required.

The undersigned agent and owner hereby hold the District of Columbia Office of Zoning and Department of Consumer and Regulatory Affairs harmless from any liability for failure of the undersigned to seek complete and proper zoning relief from the Board of Zoning Adjustment.

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Owner's Signature	Owner's Name (Please Print)
	Safe Shores (contract lessee) by Jennifer Massengale, Esq., Acting Exec. Director
Agent's Signature	Agent's Name (Please Print)
	Michael E. Hickok

03/04/2003		or	3217

OFFICE OF ZONING DETERMINATION

(DCMR Title 11 §3113.2)

☐	Accepted for filing.
☐	Referred to the Office of the Zoning Administrator, Department of Consumer and Regulatory Affairs, for determination of proper zoning relief required.
☐	Rejected for failure to comply with the provisions of ☐ DCMR Title 11 §3113.2; or ☐ DCMR Title 11 Zoning Regulations. Explanation _____

Jerrily R. Kress, FAIA – Director
District of Columbia Office of Zoning

441 4th Street, N.W. Ste. 210-S, Washington, D.C. 20001
(202) 727-6311 * (202) 727-6072 fax * www.dcoz.dc.gov

Side 2

INSTRUCTIONS

Any request for self-certification that is not completed in accordance with the following instructions shall not be accepted.

1. All self-certification applications shall be made on Form 135. All certification forms must be completely filled out (front **and** back) and be typewritten or printed legibly. All information shall be furnished by the applicant. If additional space is necessary, use separate sheets of paper to complete this form.
2. Complete one self-certification form for each application filed. Present this form with the Form 120 Application to the Office of Zoning, 441 4th Street, N.W., Suite 210, Washington, D.C. 20001.

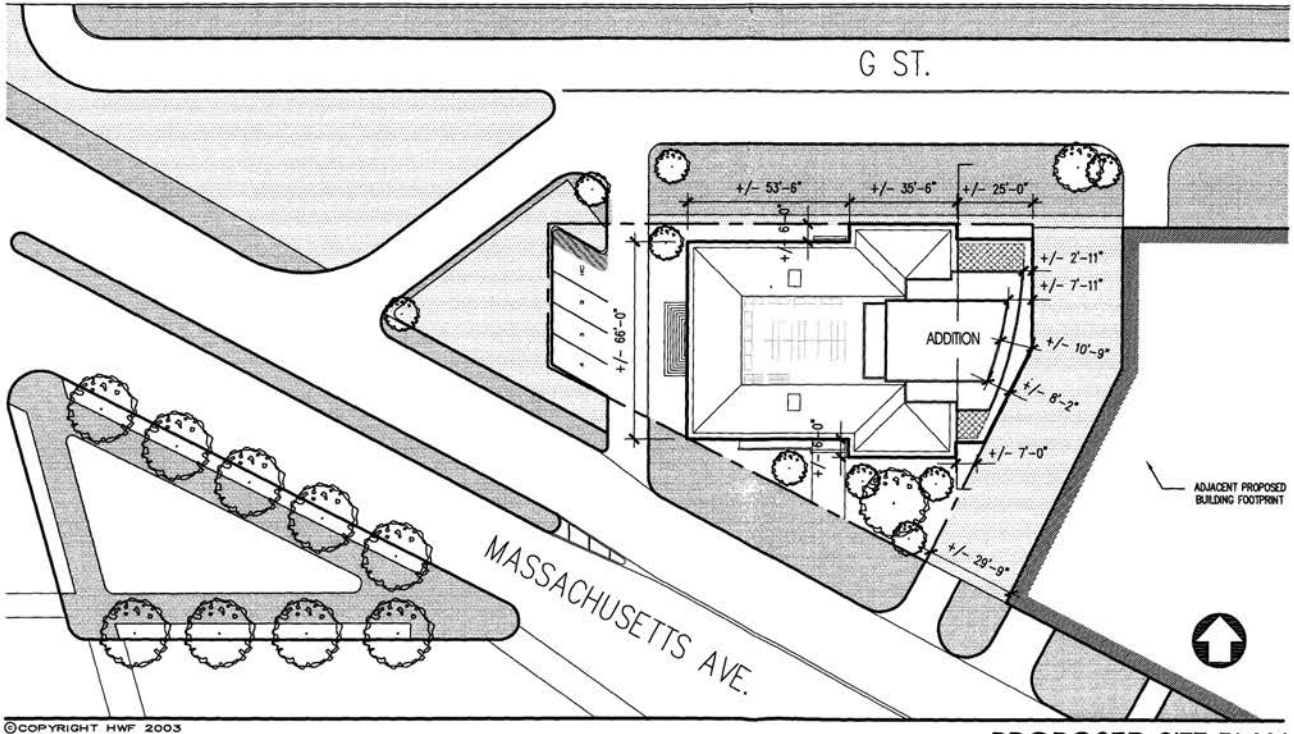
ITEM	EXISTING CONDITIONS	MINIMUM REQUIRED	MAXIMUM ALLOWED	PROVIDED BY PROPOSED CONSTRUCTION	VARIANCE Deviation/Percent
Lot Area (sq. ft.)	12,717	N/P	N/P	12,717	None
Lot Width (ft. to the tenth)	82.24' (see def. for irregular shaped lots)	N/P	N/P	82.24'	None
Lot Occupancy (building area/lot area)	49.6%	N/P	100%	60.8%	None
Floor Area Ratio (FAR) (floor area/lot area)	1.99	N/P	6.5	3.0	None
Parking Spaces (number)	N/A	N/A (historic)	N/P	N/A	None
Loading Berths (number and size in ft.)	N/A	N/A (historic)	N/A	N/A	None
Front Yard (ft. to the tenth)	35'	N/A	N/A	35'	None
Rear Yard (ft. to the tenth)	22.1'	13.1'	N/P	None	100% waiver
Side Yard (ft. to the tenth)	19.6'	10.5'	N/A	19.6'	None
Court, Open (width by depth in ft.)	None	N/A	N/P	None	None
Court, Closed (width by depth in ft.)	N/P	N/A	N/P	None	None
Height (ft. to the tenth)	63.3'	N/P	90'	63.3'	None



GALES SCHOOL RENOVATION

65 MASSACHUSETTS AVE. NW, WASHINGTON, DC

D.C. OFFICE OF ZONING
2003 MAY -6 PM 3:23



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PROPOSED SITE PLAN

HICKOK
WARNER
FOX

ARCHITECTS

STUDIO Z
DESIGN CONCEPTS

DRAWINGS ISSUED:
BZA
PERMIT DRAWINGS
20 MAY 2003

A5

1023 31st Street, NW
Washington, DC 20007
Phone 202.667.9776
Fax 202.667.2060

C

DISTRICT OF COLUMBIA GOVERNMENT
OFFICE OF THE SURVEYOR

Washington, D.C., April 10, 2003

Plat for Building Permit of SQUARE 625 - SITE PER SUB

Scale: 1 inch = 20 feet

Receipt No. 03980

Furnished to: K. CARTER

Surveyor, D.C.

By: L.E.S. VMA

I hereby certify that all existing improvements shown hereon, are completely dimensioned, and are correctly platted; that all proposed buildings or construction, or parts thereof, including covered porches, are correctly dimensioned and platted and agree with plans accompanying the application; that the foundation plans as shown hereon is drawn, and dimensioned accurately to the same scale as the property lines shown on this plat;and that by reason of the proposed improvements to be erected as shown hereon the size of any adjoining lot or premises is not decreased to an area less than is required by the Zoning Regulations for light and ventilation; and it is further certified and agreed that accessible parking area where required by the Zoning Regulations will be reserved in accordance with the Zoning Regulations, and that this area has been correctly drawn and dimensioned hereon. It is further agreed that the elevation of the accessible parking area with respect to the Highway Department approved curb and alley grade will not result in a rate of grade along centerline of driveway at any point on private property in excess of 20% for single-family dwellings or flats, or in excess of 12% at any point for other buildings. (The policy of the Highway Department permits a maximum driveway grade of 12% across the public parking and the private restricted property.)

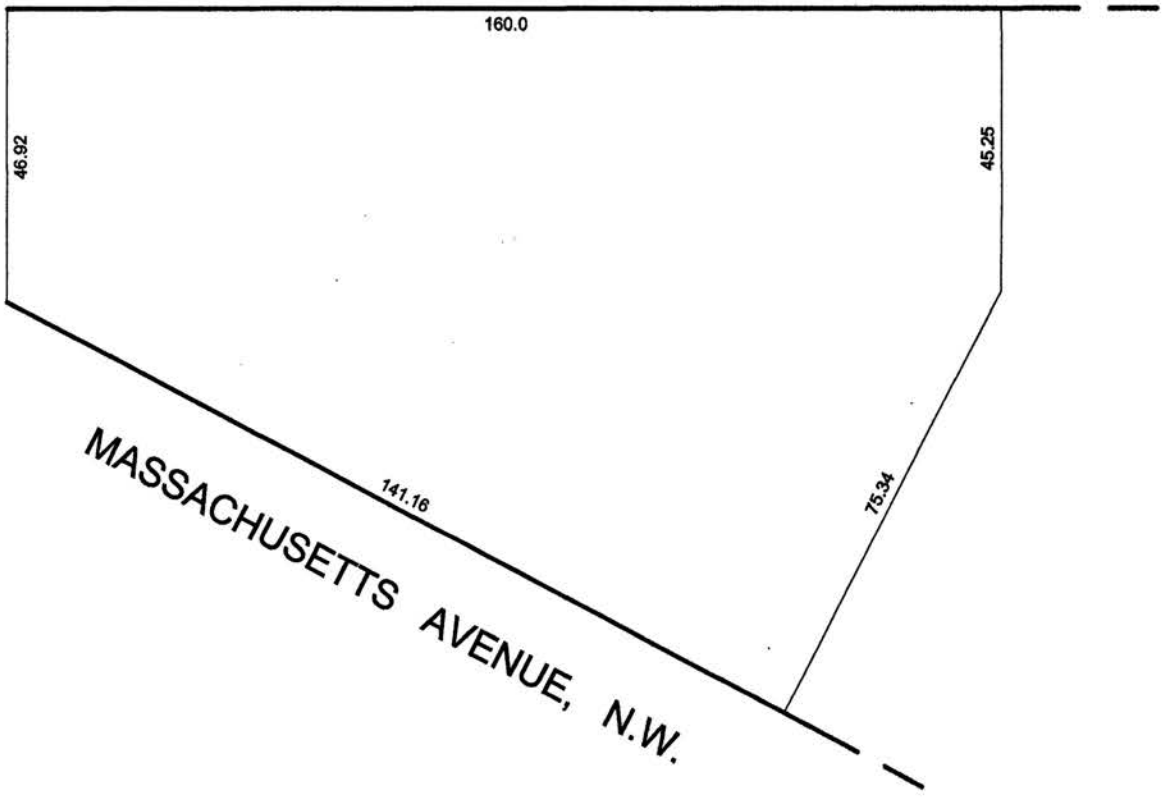
Date: _____

_____
(Signature of owner or his authorized agent)

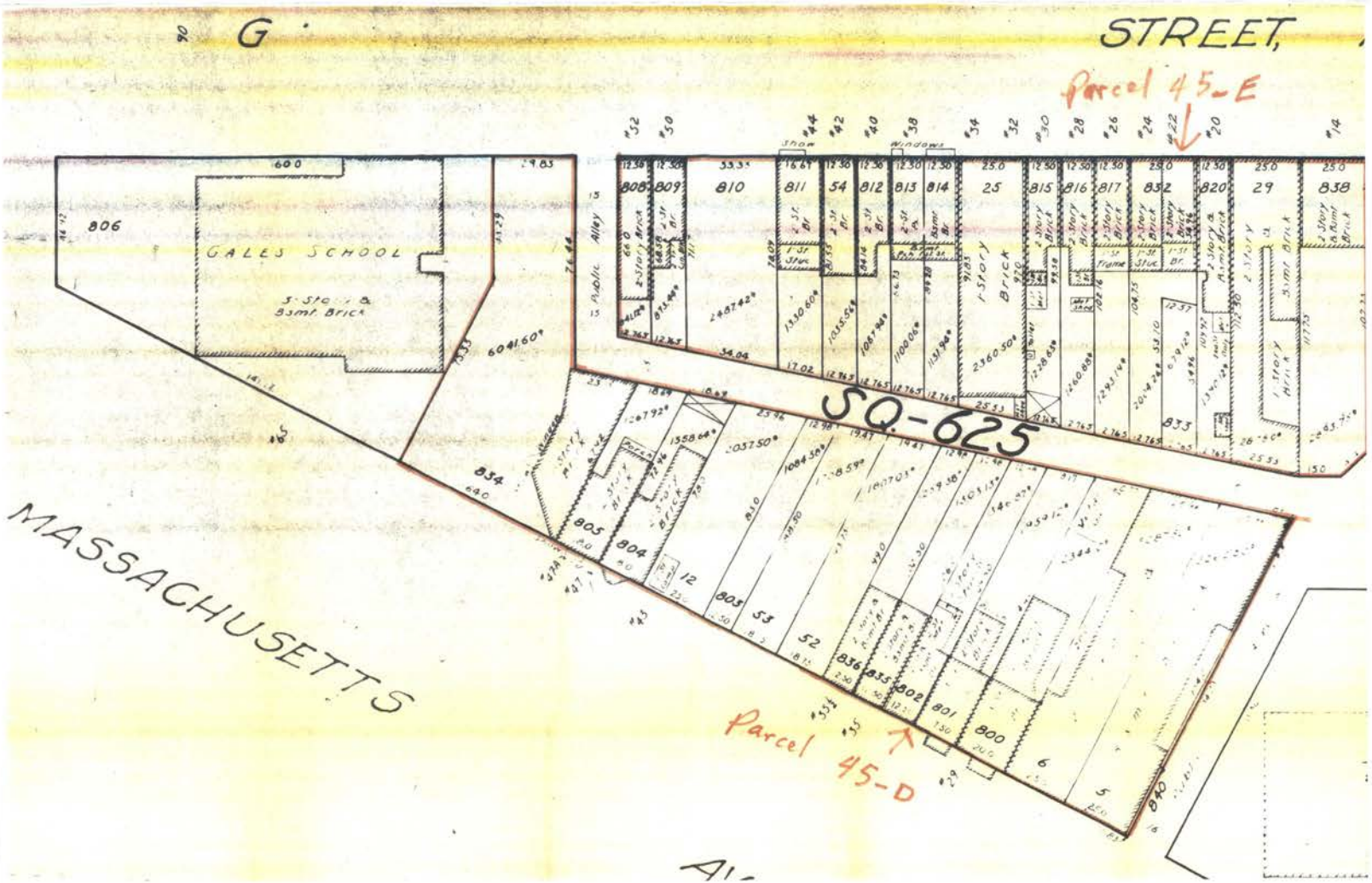
NOTE: Data shown for Assessment and Taxation Lots or Parcels are in accordance with the records of the Department of Finance and Revenue, Assessment Administration, and do not necessarily agree with deed description.

A SUBDIVISION HAS
BEEN ORDERED TO
CREATE A LOT OF RECORD.
MA 4/11/03

G STREET, N.W.



SO-03980(2003)


G
STREET
Parcel 45-E
GALES SCHOOL
SQ-625
MASSACHUSETTS
Parcel 45-D
Public Alley
806
809
810
811
54
812
813
814
25
815
816
817
832
820
29
838
833
834
805
804
12
53
52
800
6
5
840



GALES SCHOOL RENOVATION

65 MASSACHUSETTS AVE. NW, WASHINGTON, DC



PROJECT TEAM

CLIENT
DC CHILDRENS ADVOCACY CENTER
300 E STREET NW
Washington, DC 20024
(202)638-2575

NATIONAL CHILDRENS ALIANCE
1612 K STREET NW, #300
Washington, DC 20006
(202)452-6327

OWNER
GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF PROPERTY MANAGEMENT
2000 14TH STREET, NW, 5TH FLOOR
WASHINGTON, DC 20009

ARCHITECTS
HICKOK WARNER FOX
1220 31ST STREET NW
Washington, DC 20007
202-687-9776

STUDIO 2
4715 CORDELL AVENUE, SUITE 800
BETHESDA, MD 20814
(301) 951-4287

CIVIL ENGINEER
VIKA
8180 Greensboro Drive, Suite 200
McLean, VA 22102
(703)442-7800

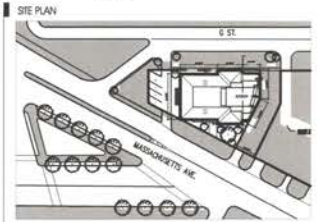
MEP ENGINEER
GRAEF ENGINEERING
1355 BEVERLY ROAD SUITE 240
MCLEAN, VA 22101
(703)442-8787

STRUCTURAL ENGINEER
STRUCTURAL DESIGN GROUP
12 South Summit Avenue, Suite 115
Gaithersburg MD 20877
301-987-9334

VICINITY MAP



SITE PLAN



CODE SUMMARY

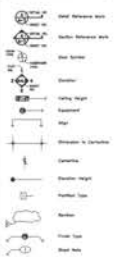
	EXISTING	PROPOSED
Use Groups:	XXX	XXX
Type of Construction:	XXX	XXX
Fully Suppressed/Sprinklers:	XXX	XXX
Building Height:	XXX	XXX

REFERENCES

Building:	IBCC-Fulchnal Building Code - 1996 ed.
Plumbing:	International Plumbing Code - 1996
Mechanical:	International Mechanical Code - 1996
Electrical:	NFPA National Electrical Code - 1996
Fire:	IBCC-National Fire Prevention Code 1996
Elevator:	IBCC-National Building Code - 1996 ed. ASME A17.1 - 1996
Accessibility:	ANSI A117.1 - 1986 ed. D.C. Construction Codes, Ch. 11 - 1999
Zoning:	11 DCMR (February, 2003) ARC-3-C

All Codes require the District of Columbia Construction Codes 1999 Supplement

SYMBOLS



DRAWING INDEX

ARCHITECTURAL

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A1	AERIAL VIEW AND PHOTOGRAPHS
A2	EXISTING CONDITION, PHOTOGRAPHS
A3	INTERIORS, PHOTOGRAPHS
A4	EXISTING SITE PLAN
A5	PROPOSED SITE PLAN
A6	PERSPECTIVE, PROPOSED N.G. MASS
A7	PERSPECTIVE
A8	PROPOSED NORTH ELEV. RENDERING
A9	PROPOSED SOUTH ELEV. RENDERING
A10	PROP. EAST/WEST ELEV. RENDERINGS
A11	SIGHT DIAGRAMS
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A13	DEMOLITION PLANS
A14	PROPOSED FLOOR PLANS
A15	PROPOSED FLOOR PLANS
A16	PROPOSED BUILDING SECTIONS
A17	POTENTIAL ADJACENT DEVELOPMENT

ZONING ANALYSIS

		EXISTING	PROPOSED	ALLOWED
ZONING GUIDELINES:	11 DCMR (February, 2003)			
ZONING DISTRICT:	ARC-3-C			
LOTS:	806			
SQUARE:	625			
HEIGHT LIMITATIONS:	Height Restriction per 770:			
	Building Height:	63'-3"	63'-3"	90'-0"
	Number of Stories above Grade:	5	5	No limit
AREA LIMITATIONS:	Total Area of Lot:	12,717	12,717	——
	FAR per 771:	2.0	3.0	6.5
	% of Lot Occupancy per 772:	49.6%	60.8%	100%
SETBACK REQUIREMENTS:	Building Rear Yard per 774.1:	19.6'	0	13.1'
	Penthouse per 411, 770.6:	——	7'-0" Setback 11'-0" Height	11'-0" Setback 18'-0" Height

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HICKOK
WARNER
FOX

ARCHITECTS

STUDIO Z
DESIGN CONCEPTS

DRAWINGS ISSUED:
BZA
PERMIT DRAWINGS
20 MAY 2003

1220 31st Street, NW
Washington, DC 20007
Phone: 202.667.9776
Fax: 202.667.2240

GALES SCHOOL RENOVATION

65 MASSACHUSETTS AVE. NW, WASHINGTON, DC


G


A. NORTHWEST CORNER


B. NORTH FACADE


H


I


F. WEST FACADE




C. NORTHEAST CORNER


J


L


D. SOUTH FACADE


E. VIEW NORTHWEST ON MASS. AVE.


K

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AERIAL VIEW AND KEY TO PHOTOGRAPHS

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GALES SCHOOL RENOVATION

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A



C



B



D

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EXISTING CONDITION- PHOTOGRAPHS

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GALES SCHOOL RENOVATION

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INTERIOR, EXISTING CONDITION PHOTOGRAPHS

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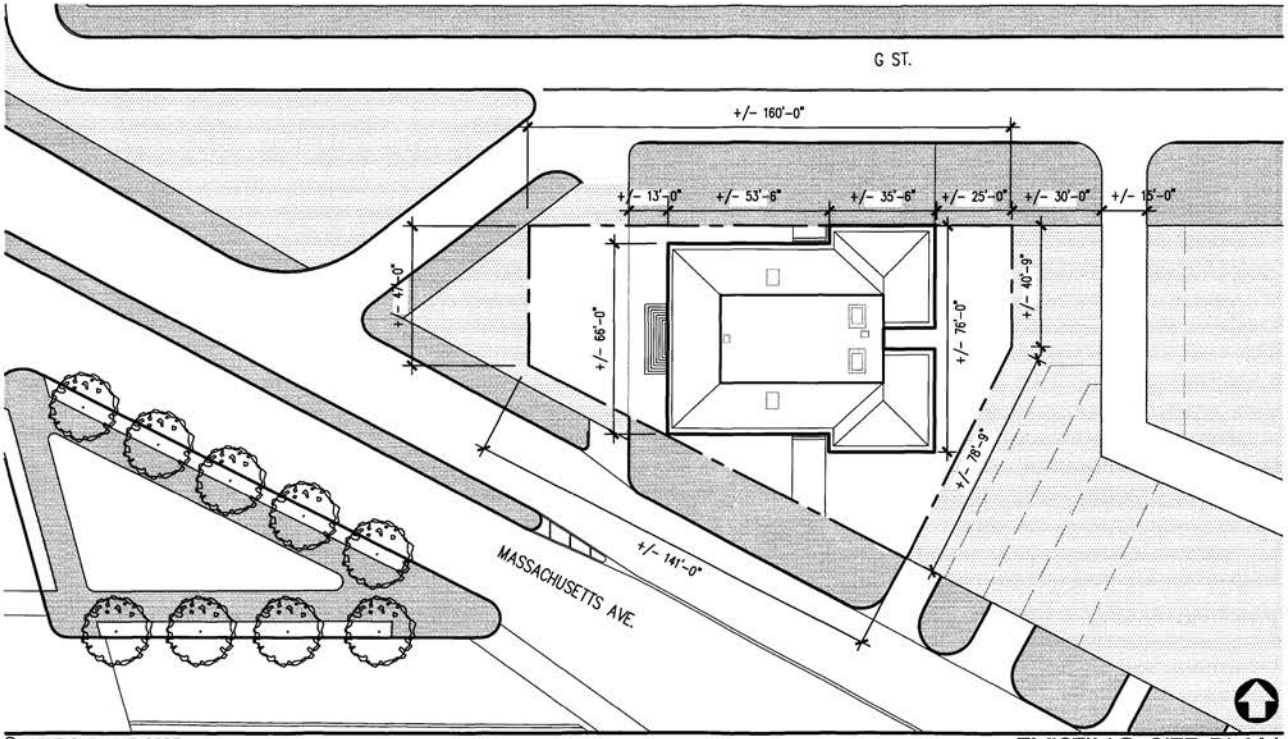
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EXISTING SITE PLAN

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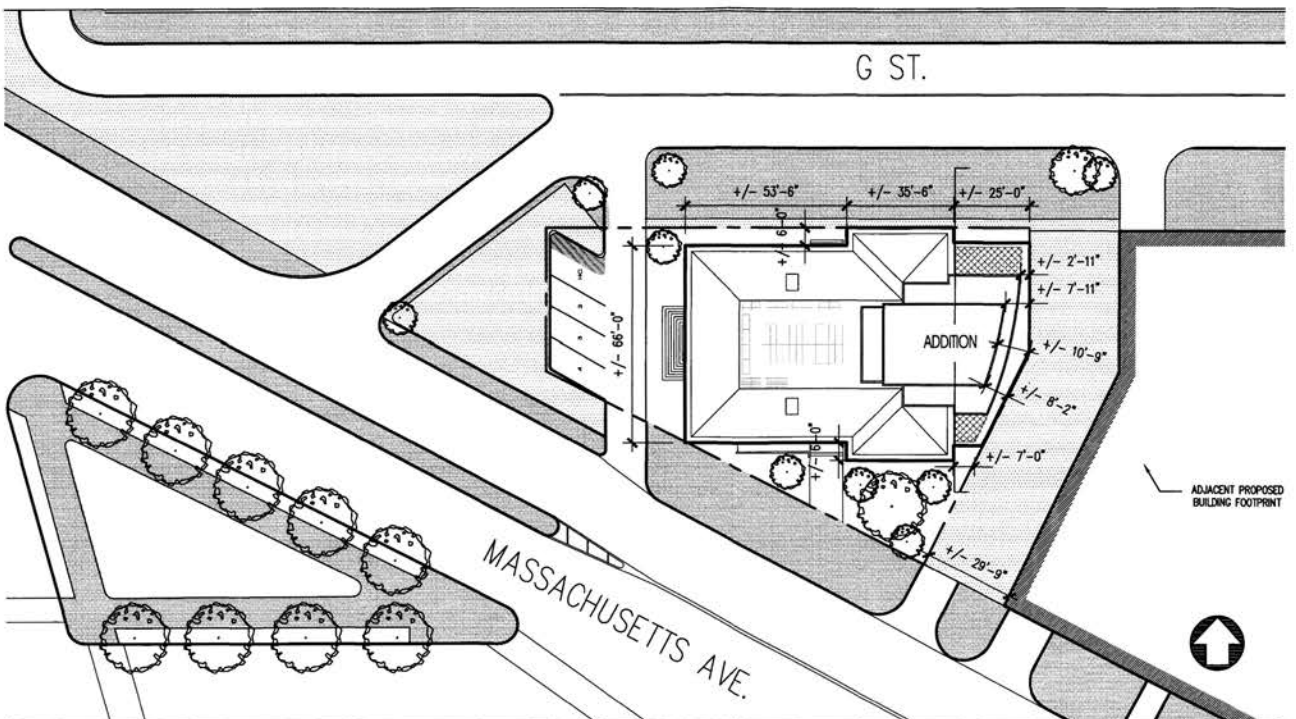
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GALES SCHOOL RENOVATION

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PROPOSED SITE PLAN

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GALES SCHOOL RENOVATION

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PROPOSED BUILDING MASS

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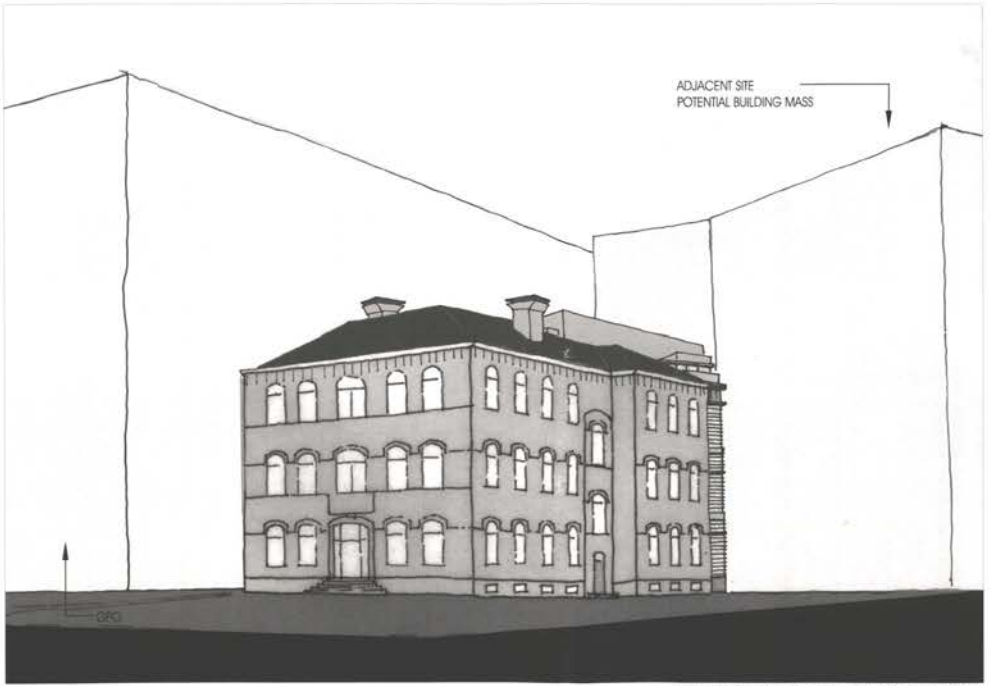
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Washington, DC 20007
Phone 202.667.9776
Fax 202.667.2240

GALES SCHOOL RENOVATION

65 MASSACHUSETTS AVE. NW, WASHINGTON, DC



VIEW FROM MASS. AVE. TOWARDS G STREET

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BUILDING PERSPECTIVE

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A7

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Phone 202.667.5176
Fax 202.667.2360

GALES SCHOOL RENOVATION

65 MASSACHUSETTS AVE. NW, WASHINGTON, DC



1 NEW NORTH ELEVATION
SCALE: 1/16"=1'-0"

HICKOK
WARNER
FOX

ARCHITECTS

STUDIO Z
DESIGN CONCEPTS

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A8

1003 21st Street, NW
Washington, DC 20037
Phone 202.667.1776
Fax 202.667.2060

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PROPOSED NORTH ELEVATION - G STREET

GALES SCHOOL RENOVATION

65 MASSACHUSETTS AVE. NW, WASHINGTON, DC



1 NEW SOUTH ELEVATION
SCALE: 1/16"=1'-0"

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PROPOSED SOUTH ELEVATION - MASSACHUSETTS AVE.

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FOX

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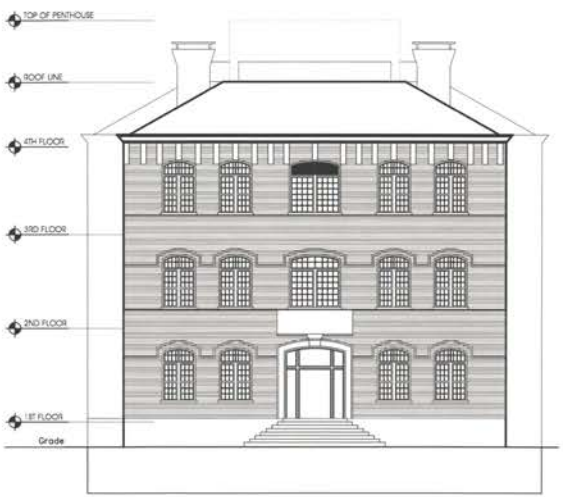
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A9

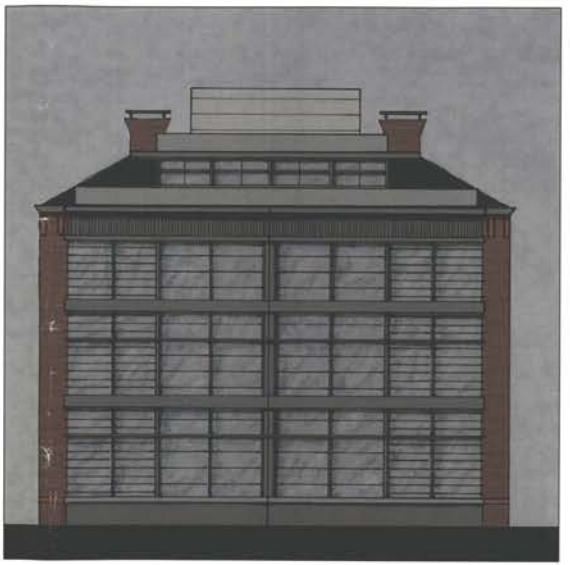
1003 31st Street NW
Washington, DC 20007
Phone 202.667.9736
Fax 202.667.2940

GALES SCHOOL RENOVATION

65 MASSACHUSETTS AVE. NW, WASHINGTON, DC



1 NEW WEST ELEVATION
SCALE: 1/16"=1'-0"



2 NEW EAST ELEVATION
SCALE: 1/16"=1'-0"

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PROPOSED WEST & EAST ELEVATIONS

HICKOK
WARNER
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ARCHITECTS

STUDIO Z
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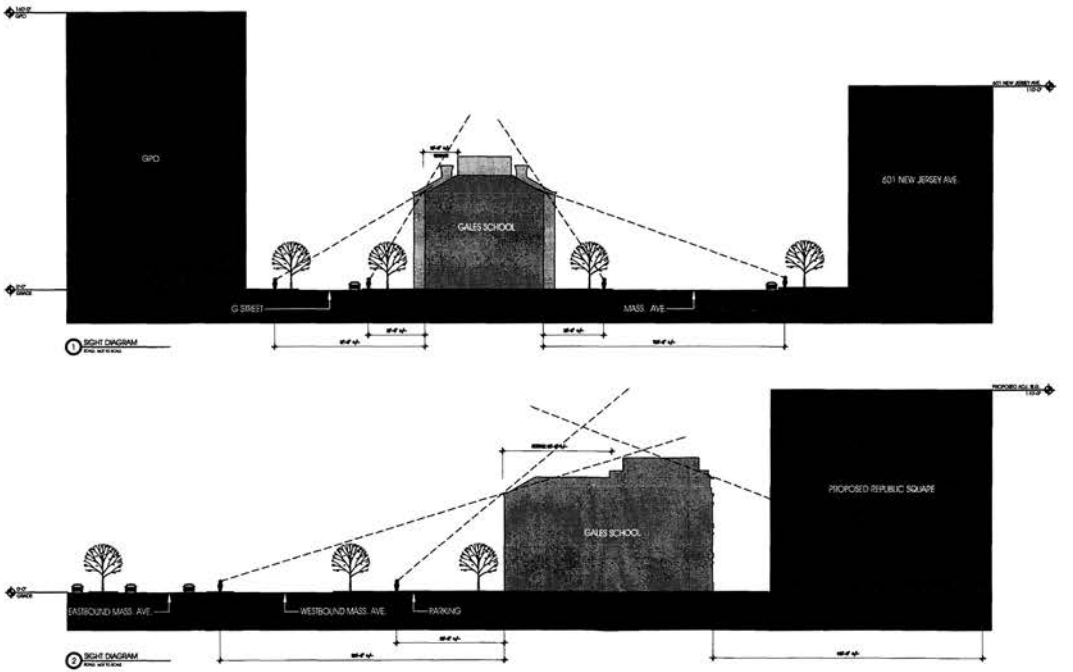
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GALES SCHOOL RENOVATION

65 MASSACHUSETTS AVE. NW, WASHINGTON, DC



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SIGHT DIAGRAMS

HICKOK
WARNER
FOX

ARCHITECTS

STUDIO Z DESIGN CONCEPTS

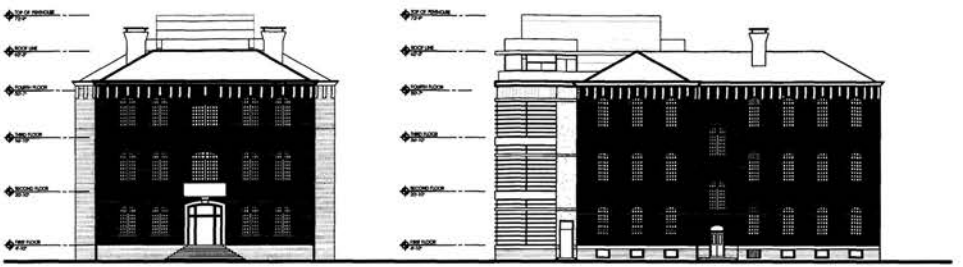
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Fax 202.667.2060

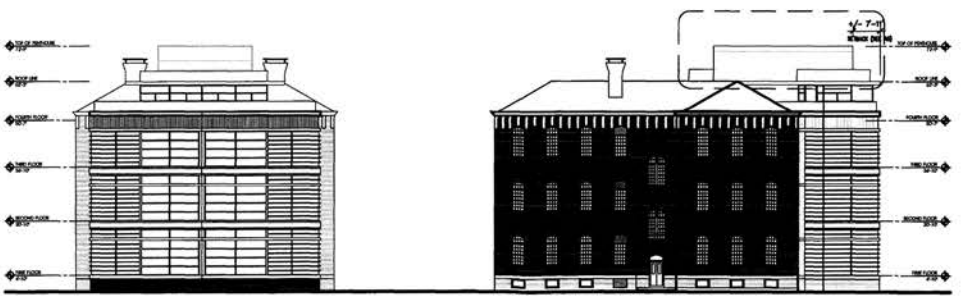
GALES SCHOOL RENOVATION

65 MASSACHUSETTS AVE. NW, WASHINGTON, DC



1 NEW WEST ELEVATION
SCALE: NOT TO SCALE

3 NEW NORTH ELEVATION
SCALE: NOT TO SCALE



2 NEW EAST ELEVATION
SCALE: NONE

4 NEW SOUTH ELEVATION
SCALE: NOT TO SCALE

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PROPOSED ELEVATIONS & DIAGRAMS

HICKOK
WARNER
FOX

ARCHITECTS

STUDIO Z DESIGN CONCEPTS

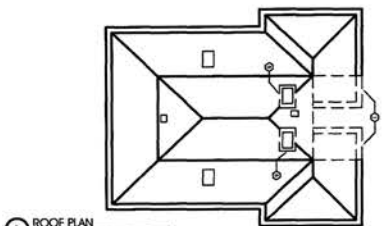
1023 31st Street, NW
Washington, DC 20007
Phone 202.667.9776
Fax 202.667.2560

DRAWINGS ISSUED:
BZA
PERMIT DRAWINGS
20 MAY 2003

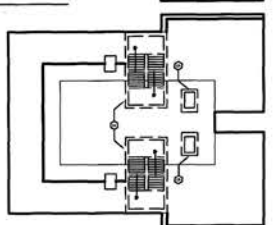
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GALES SCHOOL RENOVATION

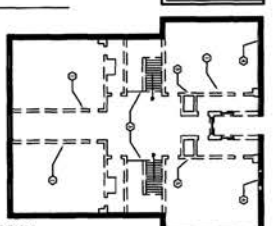
65 MASSACHUSETTS AVE. NW, WASHINGTON, DC



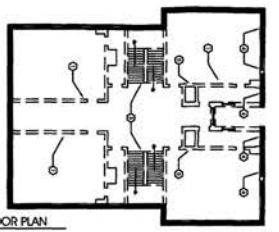
1 ROOF PLAN
SCALE: 1/32" = 1'-0"



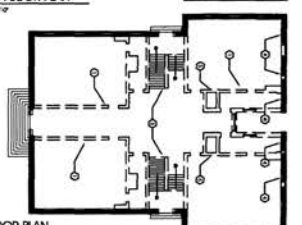
2 ATTIC PLAN
SCALE: 1/32" = 1'-0"



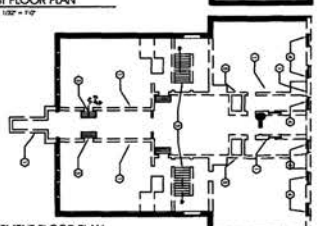
3 THIRD FLOOR PLAN
SCALE: 1/32" = 1'-0"



4 SECOND FLOOR PLAN
SCALE: 1/32" = 1'-0"



5 FIRST FLOOR PLAN
SCALE: 1/32" = 1'-0"



6 BASEMENT FLOOR PLAN
SCALE: 1/32" = 1'-0"

Demolition Plan Notes

1. Remove brick wall.
2. Remove existing floor slab to accommodate new floor slab.
3. Remove existing stairs and stair enclosure.
4. Remove existing window. See attached Elevation drawings for specific scope of demolition and replacement.
5. Remove existing chimney.

Demolition General Notes

1. Existing brestes to be protected during demolition. Contractor to provide temporary bracing to stabilize existing exterior walls during demolition, excavation and construction. See attached structural documents.
2. Building to be protected and secure at all times during demolition and construction. Provide temporary partitions at all floor openings. See attached documents for structural stabilization.
3. Structurally modify and modernize roof. Existing slope and exterior appearance to remain.
4. Remove existing wood joists, slabs, and all interior partitions. Prepare for new code compliant structure.
5. Remove existing basement structure and all partitions.
6. Remove existing egress stairs. Replace with code compliant stairs.
7. Remove existing fixtures, equipment, wiring and plumbing. Prepare area for new code compliant construction.
8. All interior doors, frames and partitions to be removed and saved for reinstallation.
9. All abandoned equipment to be removed.

Demolition Legend

Existing construction to remain.

Existing wall partition to be removed.

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DEMOLITION PLANS

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WARNER
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STUDIO Z
DESIGN CONCEPTS

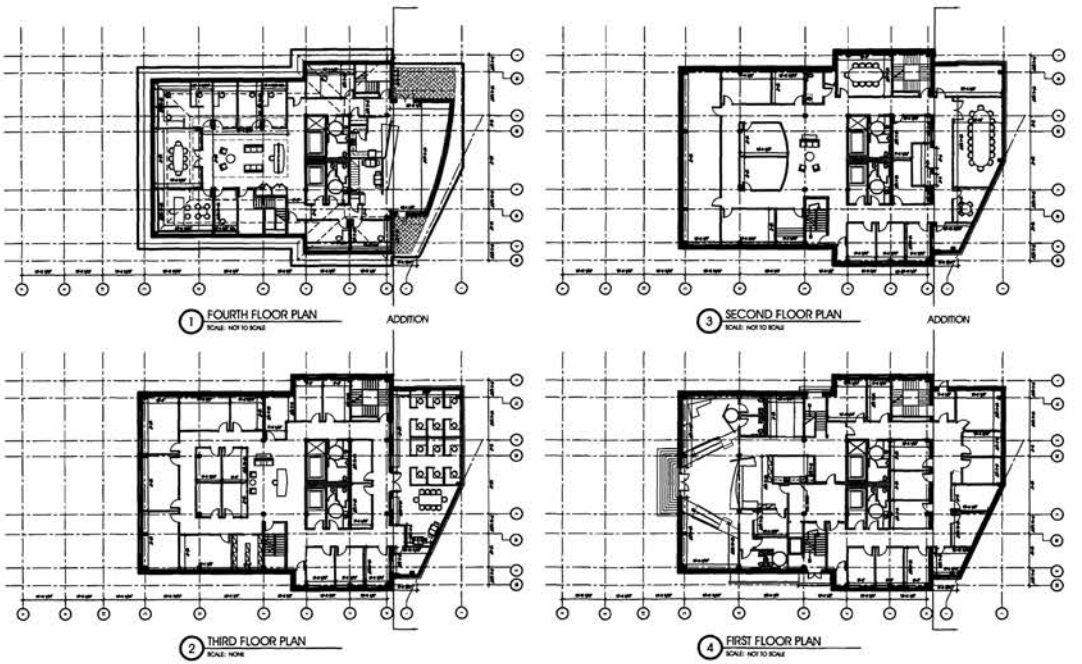
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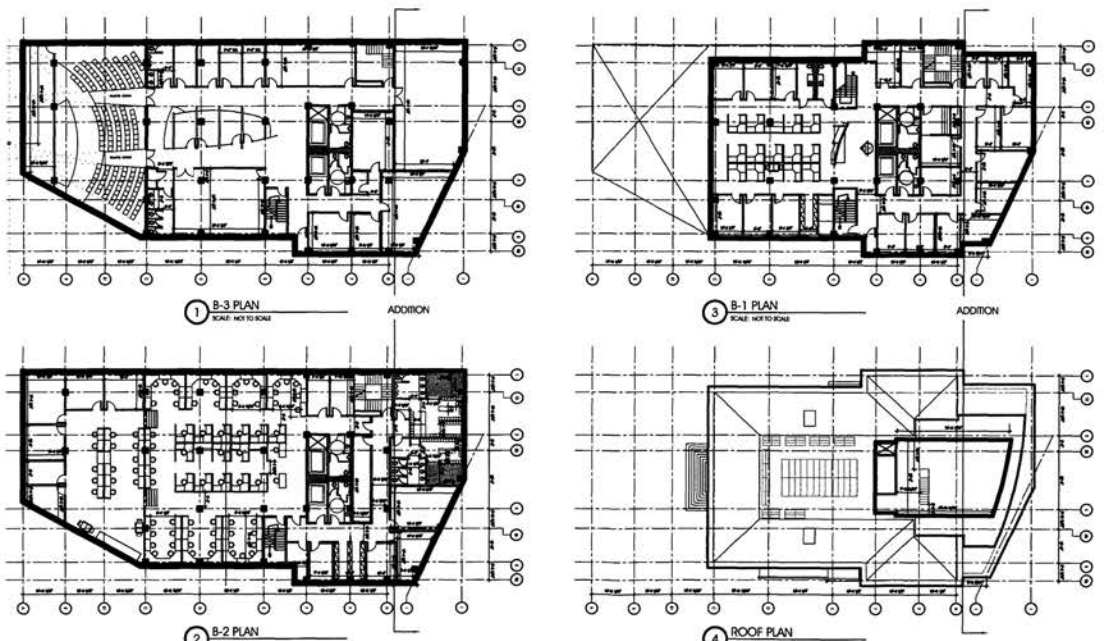
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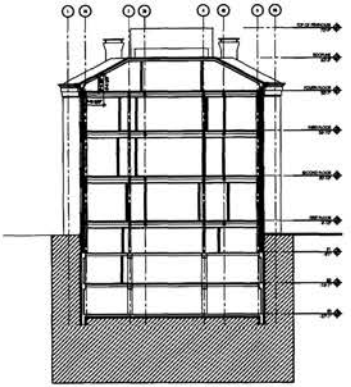
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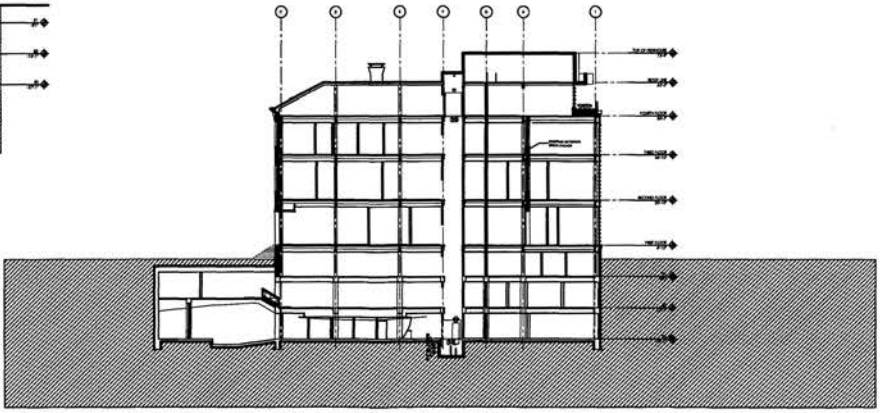
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1 TRANSVERSAL SECTION
SCALE: NONE



2 LONGITUDINAL SECTION
SCALE: NONE

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PROPOSED BUILDING SECTIONS

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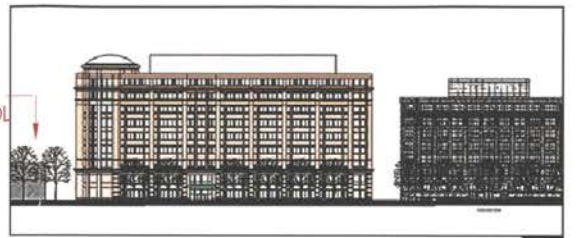
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POTENTIAL ADJACENT DEVELOPMENT - REPUBLIC SQUARE

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