FRIENDS OF WHITEHAVEN
TESTIMONY AND SUBMISSION OF CONDITIONS
REGARDING SPECIAL EXCEPTION APPLICATION #17276
2101 FOXHALL ROAD, NW (SQUARE 1346, LOT 822)
D.C. BOARD OF ZONING ADJUSTMENT (BZA)
MARCH 8, 2005

Presented by William J. Snape, III, Esq.
Counsel for Friends of Whitehaven

Accompanied by Kent Slowinski, landscape architect
Chair for Friends of Whitehaven

As we have publicly stated several times, Friends of Whitehaven ("Friends")[1] is not opposed outright to this special exception application, and could support it with certain reasonable conditions. However, over the past two months, the more we have learned about this proposal, the more we have become concerned. We believe, regretfully, there remain significant outstanding questions that prevent this Board from approving the present flawed application package. Just last week, in fact, the Advisory Neighborhood Commission with jurisdiction over this matter (ANC 3D) unanimously passed a motion seeking either to review the changed plans again, or for the BZA to consider and adopt conditions relating to the grading plan, the stormwater management plan, trees and parkland protection, and enforceability mechanisms. Our testimony builds off the fine and courageous work of the ANC, and ends with reasonable conditions of our own that are wholly consistent with the stated objectives of the ANC, the National Park Service (NPS), and the D.C. Department of Health.

The Applicable Zoning Law

As a threshold matter, the Friends are seeking protections for both the national parkland (Whitehaven and Glover-Archbold) and the surrounding community as "neighboring property." Three D.C. regulatory zoning provisions pertaining to this Board's eventual decision are particularly relevant, and will be recounted here. First, 11 D.C.M.R. § 3104.1 generally states that special exceptions must "*not tend to affect adversely, the use of neighboring property*" (emphasis added). Second, pursuant to 11 D.C.M.R. § 2516.9, "the proposed development shall comply with the substantive provisions of this title and *shall not likely have an adverse effect on the present character and future development of the neighborhood.*" (emphasis added). Third, the BZA must consider the enunciated factors contained in 11 D.C.M.R. § 2516.10, which include, but are not limited to:

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[1] The "Friends" are a non-profit D.C. association whose purpose "is to continue and further the conservation, protection and enjoyment of the Whitehaven National Parkland." The association "was established to encourage and support the maintenance and preservation of the parkland's over fifty-year history as a treasured wooded and open green space for residents, wildlife and watershed protection." Articles of Association, 25 August, 2003.

Case No. 17276
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EXHIBIT NO. 53

(a)(2) The environment, relating to water supply, water pollution, soil erosion, and solid waste management;
(a)(3) Public education;
(a)(4) Recreation;
(a)(7) As appropriate, historic preservation and visual impacts on adjacent parkland;
(d) The impact of the proposed development on neighboring properties; and
(e) The findings, considerations, and recommendations of other District government agencies.[2]

Trees

We believe that saving 64 trees out of at least 252 "special trees"[3] (and many more total trees) is neither sufficient nor laudable. Many of these 64 are partially or wholly on either NPS property or Mrs. Hardy's property (e.g., 40, 42, 43, 44, 45, 48, 127). Further, at least two large white oaks of over 100 feet in circumference (#172 and #173) are listed as "saved" in the most recent tree preservation plan, but listed as removed in the original tree plan. We also do not support the proposal to remove several healthy, mature and bird-bearing sycamores (i.e., 35, 36, 38) on, or immediately adjacent to, Mrs. Hardy's property; at least one of these 60-foot sycamores is not even on the tree inventory. We believe the massive chestnut oak tree (over 150 inches of circumference, #78) should be saved.

Further, as will be described more fully below, fitting a road to a steep slope, as the applicant has done, requires extensive re-grading which results in potentially severe tree loss (and subsequent soil erosion). Adding 10-20 feet of fill (depending upon location) and trying to save trees requires extensive retaining walls. We have not yet seen the engineering for these walls, some of which are as high as 10-12 feet and completely encircle the trees to be saved. The footings on some of these walls will disturb tree roots in the root protection zone, decreasing the trees' chances for survival.

Migratory Birds and Other Wildlife

We do not accept applicant's assertion that "there will be no adverse affect on surrounding wildlife populations." Pre-Hearing Statement at 31. This is so for at least two reasons. First, nowhere does the applicant take into account the active fox den that is immediately adjacent to the southwest corner of the proposed development. Second, applicant's assertion that "with regard to claims that the Property is along a migratory bird flight path, the migratory birds in question are water fowl" is blatantly incorrect. Both Friends and the Park Service possess over forty years of bird data on and around the

[2] The Supremacy Clause of the U.S. Constitution, Article VI, dictates that this body cannot take a position contrary to that of federal law, such as the National Park Organic Act, the Clean Water Act, the Migratory Bird Treaty Act, and others.
[3] That term is defined in the D.C. Urban Forest Preservation Act, § 102(5), as "a tree with a circumference of 55 inches or more."

Phillips property where literally over 100 different bird species – including warblers[4], sparrows, wrens, woodpeckers, flycatchers, vireos, finches, hawks, and eagles (i.e., non-waterfowl) – have been spotted. These birds provide significant recreational and educational benefit to the public. The applicant has no idea how many birds will be killed or injured by its proposal, and has not attempted to consult with the U.S. Fish and Wildlife Service, or any D.C. agency, about ways to mitigate such illegal damage. See 16 U.S.C. § 703 (prohibition against "take" without a permit).

Wetlands and Related Issues

Perhaps the most serious problem caused by this development proposal, an issue *inter alia* which impacts both tree and wildlife conservation, is the high probability (if not certainty) that the federally identified wetlands on Park Service land and the Phillips property will be irreversibly damaged or destroyed. Further, we do not accept that the wetland on the Phillips property is completely "artificial" or "an issue of internal water service lines." Pre-Hearing Statement at 30. In any event, the applicant has provided no independent evidence for any of its assertions regarding wetlands protection and its proposal.[5] All of the U.S. Army Corps' documents in the record support the Friends' view of proceeding with extreme caution here in order to protect water resources. Wetlands provide many beneficial water-related functions (e.g., flood control, aquifer replenishment, feeding streams, water quality, erosion control, climate modification, among others).

These are significant issues not only because they directly impact the factors under D.C. zoning regulations that this Board must consider, but also because they raise the very real specter of a violation of both federal and D.C. environmental law. See, e.g., 33 U.S.C. § 1344. As the U.S. Army Corps of Engineers has directly told the applicant, "You are reminded that any grading or filling of Waters of the United States, including jurisdictional wetlands, is subject to ... authorization." Pre-Hearing Statement, Tab 4 at 2. The representative of the D.C. Department of Health was unable to say much to this Board about any aspect of clean water compliance from his perspective because there was insufficient information from the applicant before him; the D.C. agency that would issue a D.C. wetlands and water quality permit, the Department of Consumer and Regulatory Affairs, has not testified before this body. We simply do not see how this Board can approve this project with such serious unresolved questions.[6] Indeed, after precipitation, anyone on this Board could stand in or near the wetlands complex on both the NPS land and the Phillips property and see the multiple streams and tributaries that feed directly into it, a fact confirmed by the Army Corps. Id. at Jurisdictional Determination attachment. The bird life is particularly active at precisely these spots.

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[4] One of these warbler species is the cerulean warbler, a beautiful blue bird, is declining throughout its range and is a candidate for the federal endangered species list, as being in some danger of extinction. It is on every "bird of concern" list in the country.

[5] According to the U.S. Geological Survey, at least 87 percent of the District's wetlands have been drained or filled since the District was established.

[6] The Preliminary Geotechnical Engineering Report now before the BZA is yet another instance of putting the cart before the horse. It states, *inter alia*, "Additional borings should be drilled once the building locations, proposed lowest levels, proposed cuts and fill, and structural loads are available." Id. at 7.

A close examination of the most recent grading plan demonstrates that the applicant continues either to fight or simply level the steep grades that mark the natural topography of the property and adjacent parkland. Significant amounts of fill will be added on lots that will run off into the wetlands. For example, the steep 33% slope by the NPS wetland is approximately 30 feet high and 300 feet long, and is where 20 feet of fill will be added. The most recent site plan also proposes more than 1,000 linear feet of impervious surface (roads, alleys, driveways, etc.) on slopes originally exceeding 20%. This will require extensive regrading, which will increase tree loss, stormwater runoff, and lead to sediments and pollutants entering the wetlands on the parkland. Nowhere in the multiple extensive materials presented to this Board has the applicant presented any information from the Army Corps, the applicable D.C. agencies, or any independent expert, about how the final site plan, grading plan, stormwater plan, tree plan, and other plans combined will impact the wetland on the parkland. In addition, under the current plan, the applicant does not appear to dispute that the wetlands complex on the Phillips property will be filled (at present, without a permit).

Requested Reasonable Conditions[7]

1) The applicant must protect at least 100 of the 252 identified "special trees," with diligent care and attention provided to protecting those trees with migratory bird nests. A certified arborist must be on site when activities that could harm special trees occur;

2) The applicant must consult with an independent wildlife expert on maintaining and protecting the fox den;

3) The applicant must have the Army Corps of Engineers, the applicable representative(s) of the D.C. government, and an independent expert analyze the impact of all final construction plans (e.g., grading, stormwater, tree, site, management) upon both the parkland wetlands and the wetlands on the Phillips property. Maximum and minimum stormwater discharges into the wetlands must be calculated. If relevant, mitigation actions must be identified and be enforceable. Documentation on road salt and pollutant filters must be provided. Up-to-date soil and geologic data must be provided and integrated into the final plans.

4) Independent peer review of the entire final development plan by the Low Impact Development Center (LIDC), located in Prince George's County, Maryland, and the nation's leader in low impact development issues.

Thank you for the consideration of our views. We would be pleased to answer any and all questions. We look forward to working with the BZA to shape an order that has a positive outcome, and that is good for the environment, good for the community, and good for the economic development of the District of Columbia. We respectfully urge you to adopt these sensible conditions.

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[7] The Friends also strongly endorse the conditions unanimously passed by ANC 3D at its March 2, 2005 meeting.

Friends of Whitehaven
Testimony and Proposed Conditions
Kent Slowinski, Chair
Regarding Special Exception Application # 17276
2101 Foxhall Road, NW (Square 1346, Lot 822)
D.C. Board of Zoning Adjustment
March 8, 2005

My name is Kent Slowinski. I am the Chair of the Friends of Whitehaven. I have 22 years of experience as a landscape architect with LDR, EDAW, and Kent Slowinski Landscape Architecture. I grew up in Spring Valley and Wesley Heights. I have lived in the neighborhood and enjoyed the benefits of Glover-Archbold Park for 48 years. I live one long block north of the old Phillips estate.

When I reviewed some of my concerns in January with Mr. Barnes, he said making changes to the site plan at this point would require an unacceptable 3 month delay. There is something seriously wrong with the process if we can't make changes to the plan one month after the project is presented to the public. It's better to spend a little time now fixing problems on paper than having to live with the negative impacts over the next several generations.

What happens on the Phillips property impacts wetlands on two national parks. The Phillips wetland flows into the adjacent Whitehaven wetland, which flows into the Glover-Archbold Park wetland **(see Attachment A)**. Not all known wetlands are documented on the DC Wetland map.

Undocumented Wetlands

Last Sunday, I walked the site with two ANC Commissioners and a biologist with the Fish and Wildlife Service. We identified a perennial stream in the vicinity of lots A-3, A-5, and the proposed Foxhall Road entrance, approximately 400 feet northwest of the designated wetland **(see attachment B)**. We estimated the flow to be 2 gallons per minute. The stream was already tagged as wetland with pink and black stripped ribbon. Adjacent to the stream was a stand of willow trees and cattails on approximately one acre of wetland that was not tagged. This western wetland is separate from the eastern wetland, which was identified in the prehearing statement as possibly being augmented by a broken waterline.

This western wetland and perennial stream suggests that the eastern wetland might also a natural wetland fed by a perennial stream. The true extent of wetlands and streams, natural and man-made, should be accurately documented and peer reviewed by an independent third party.

According to Dr. Hamid Karrimi, DC Environmental Health, the perennial stream must not be impacted, and any building in this area will require a permit. The latest plan does not take into account this western wetland and perennial stream.

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Steep Slopes

On several occasions, representatives for Phillips LLC presented their developing plans to the community. Each time we were reassured that they were working with the existing contours and fitting the roads to the topography. I was especially interested in seeing how they proposed to do this, as a quick slope analysis shows the site is approximately 1/3 slopes exceeding 20 percent, 1/3 slopes 10 to 20 percent, and 1/3 slopes less than 10 percent **(see attachment C).**

It is a difficult site to develop. Roads on steep slopes require extensive grading which results in extensive tree loss. Extensive tree loss results in increased stormwater runoff, erosion, and sedimentation. Approximately 80% of the property drains to the wetland which flows onto the Whitehaven wetland. The wetland serves as a bioretention basin, slowing runoff and filtering sediments and pollutants. If stormwater flows are increased, the wetland will be eroded. If stormwater flows are decreased, the wetland will dry out and die.

Extensive Regrading

When I saw the grading plan with existing contours for the first time just last week, I realized they weren't working with the contours. Instead, they are working the contours. Instead of working with the steep slopes, the proposed solution is to get rid of the steep slopes, by regrading most of the site. Approximately 10-20 feet from the W Street area will be excavated and 10-20 feet of fill will be placed on what "might" be man-made wetland. The slope by the southern wetland will be approximately 30 feet high, 300 feet long and more than 30 percent steep. The dimensions are similar to an infamous retaining wall in the neighborhood. Unfortunately, the Phillips site isn't protected by a tree and slope overlay.

Approximately 80 percent of the site will be regraded, removing native vegetation from most of the site **(see attachment D)**. Such extensive regrading will increase tree loss, stormwater runoff, erosion, and sedimentation. Filling in the wetlands will eliminate the bioretention benefits - removing sediments and pollutants, and reducing stormwater runoff.

Tree Preservation

There are approximately 230 trees per acre on the 4 acre eastern woodland as stated in the developer's prehearing statement, or approximately 900 trees. This area has steep slopes, some more than 33%. If the intent is to save trees, the last thing you want to do is place a road on steep slopes. A better alternative is to move the road to the side of the woodland ridge, and fit the houses to the slope among the trees.

The proposed regrading requires retaining walls up to 12 feet high **(see attachment E)**, some of which are built within the tree root protection zones (1 ½ feet per inch for poplar, 1 foot per inch for beech, and ½ foot per inch for oak). The proposed cut and fill will

likely impact the sensitive poplar and beech roots. One stand of trees on the southwest portion of the site is completely encircled by retaining walls. Many of these retaining walls and the corresponding fill will disturb the root protection zone of trees to be saved. There is no information on the 12 foot high retaining walls, such as engineering, footing depth, materials, limits of grading, or tree root protection zones.

The existing tree inventory is out of date. It includes several trees that have died and no longer exist. In addition, several existing trees are not documented. The tree preservation plan in the latest submission is illegible.

Low Impact Development

Low impact development appears to be an afterthought. The island on the main road stops 300 feet short of the low point, passing up a prime opportunity to filter stormwater before entering the stormwater management area. Garden walls appeared in the islands just last week. There is no information on rain gardens on individual lots, or covenant requirements to build or maintain rain gardens. I'm not sure how you build a rain garden on compacted fill.

According to the Low Impact Development website, some LID techniques are so efficient that developments are designed to handle 100 year storms. Neil Weinstein of the Low Impact Development Center has offered to provide peer review of the low impact development features. His LID recommendations should be incorporated into the site plan.

With designated wetlands on site and downstream on two adjacent national parks, shouldn't we require more than designing for just a 2-15 year capacity?

Site Planning

The information in Schnabel's geotechnical report on the soil borings is incomplete. Only half the borings were performed. The plan showing soil boring locations is incomplete. The report's recommendations in item #5 have not been completed for placement of roads and structures.

An odd circulation pattern exists from removing the second W Street entrance by Senator Stevens' house. If you enter from W Street, loop down and back up to where the second W Street entrance was, you have to exit either right or left into an alley (as identified in section N-A).

The 1980s development plan proposed just 25 lots without any roads on the steepest slopes **(see attachment F)**. Unfortunately, several lots were proposed on the wetland. Should the number of houses be reduced to prevent a similar mistake? Fortunately, the real estate market tanked before the property was developed.

Recommendations

With valuable woodland and wetland habitat on this site, wetlands downstream on two adjacent properties, and the longest running migratory bird study on the adjacent national park, shouldn't we require or at least encourage environmentally sensitive development?

Julie Moore, a conservation biologist, reviewed the site plan and had the following reasonable recommendations:

1. Layout the roads to fit with the topography, avoiding steep slopes.
2. Reduce the lot size to save valuable wetland and woodland habitat.
3. Preserve more trees in groves instead of single specimens.
4. Save a certain percentage of native vegetation on each lot.

I developed an environmentally sensitive site plan that responds to Julie Moore's recommendations **(see attachment G).** This alternative shows that natural features, such as wetlands and woodlands, can be identified and preserved. Roads can be laid out to work with the topography. The extent of grading can be reduced to save more trees and native vegetation. Reduced lot size can yield the same number of lots. Environmental concerns can be balanced with economic concerns.

The Friends of Whitehaven are not against development. We are for good development, but it all begins with environmentally sensitive site planning and design, and as the former Interior Secretary Bruce Babbitt said, "Eternal vigilance."

Proposed conditions are attached.

Proposed Dunmarlin conditions **March 8, 2005**

Wetland/Parkland Issues

1. Document true extent of natural and man-made wetland and streams.
2. Document existing topography, including streams and rough grading of Driggs road.
3. Establish 100 foot wetland buffers and 100 foot park setbacks.
4. Establish wetland conservation easement on all wetlands and streams.
5. Incorporate wetland as site feature, reduce fill (30 feet) and decrease slope (33%).
6. Provide documentation on wetland protection measures during and after construction.
7. Provide documentation on handling existing surface water in areas to be filled.

Stormwater Issues

8. Provide calculations for maximum and minimum stormwater discharge into wetland.
9. Provide documentation on road salt filter or other abatement feature.
10. Provide Army Corps permits for filling of wetland and discharge into wetland.
11. Extend island past low point of main road to filter stormwater before entering SMA.

Low Impact Development Issues

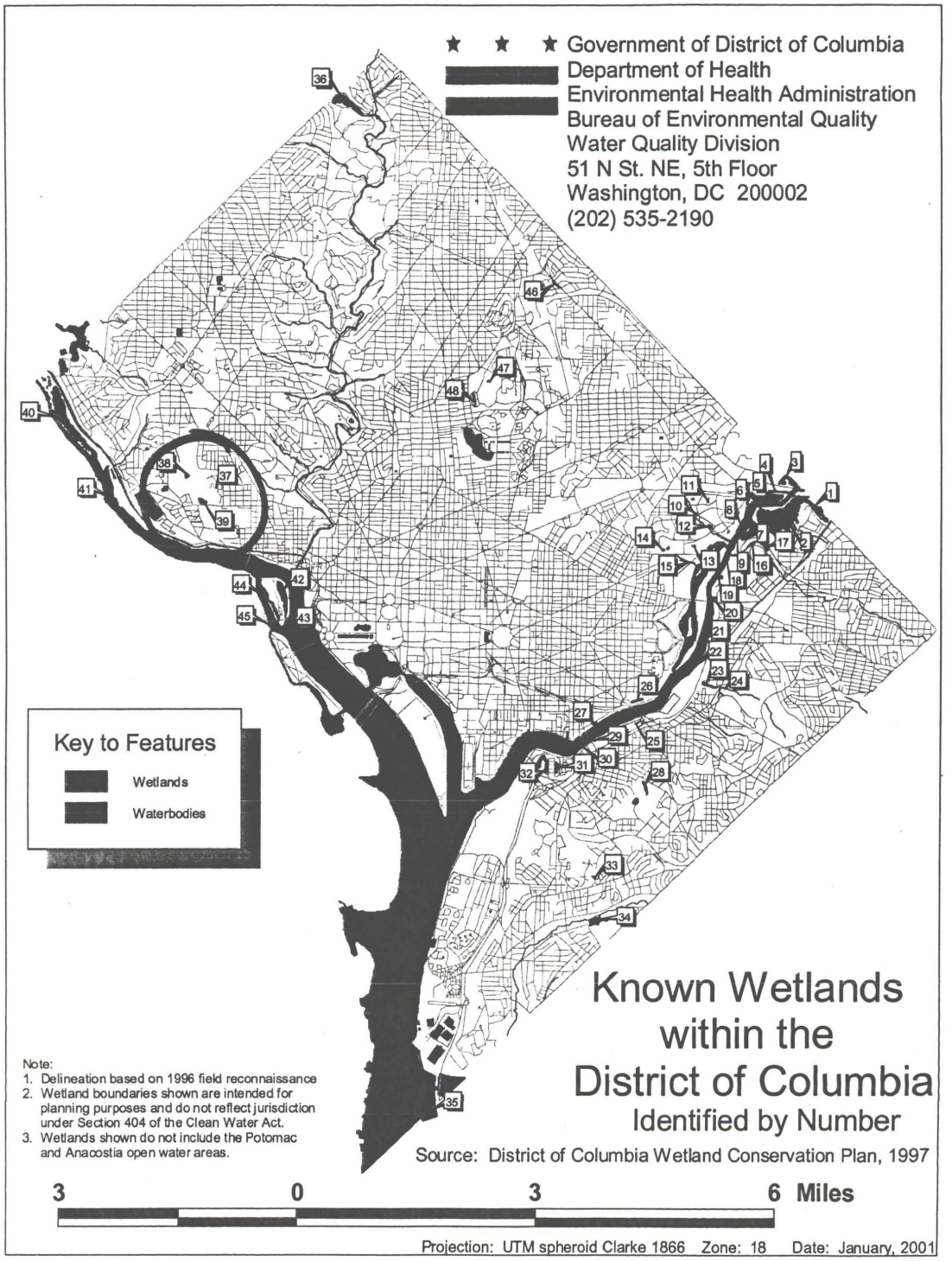
12. Design LID and stormwater filtration system to handle 100 year storm.
13. Set aside 20 percent of each lot to be used for rain garden.
14. Show dedicated rain garden areas on each lot.
15. Provide documentation on how to construct rain garden on compacted fill.
16. Provide covenant language requiring owners to maintain rain gardens.
17. Conduct peer review of LID techniques by Low Impact Development Center.

Trees Preservation Issues

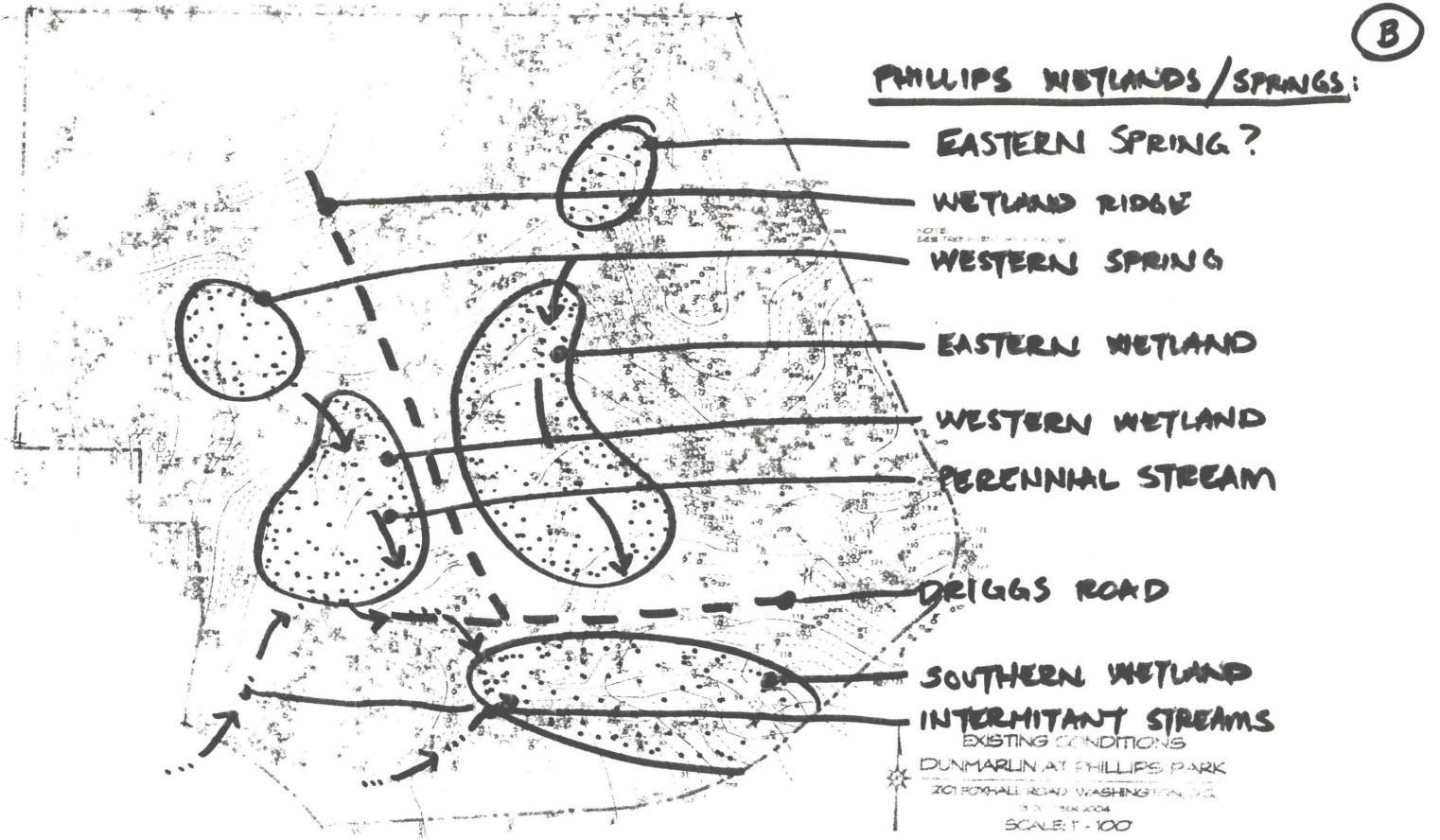
18. Update tree inventory - add missing trees and remove dead trees.
19. Identify tree number, type of tree, and size of tree to be saved on legible plan.
20. Work with topography to save at least 75% of trees and reduce retaining wall heights.
21. Move the road off the woodland ridge to save more trees in the eastern woodland.
22. Remove roads, retaining walls, and structures from poplar and beech root zones.
23. Remove lot A-13 to save 49 inch caliper chestnut oak (#78).
24. Examine all trees for nests prior to removal. Do not remove trees with active nests.
25. Provide details of retaining walls showing footing depth, material, heights, distance to trees, limits of grading, tree root protection area (oak, beech, poplar), etc.

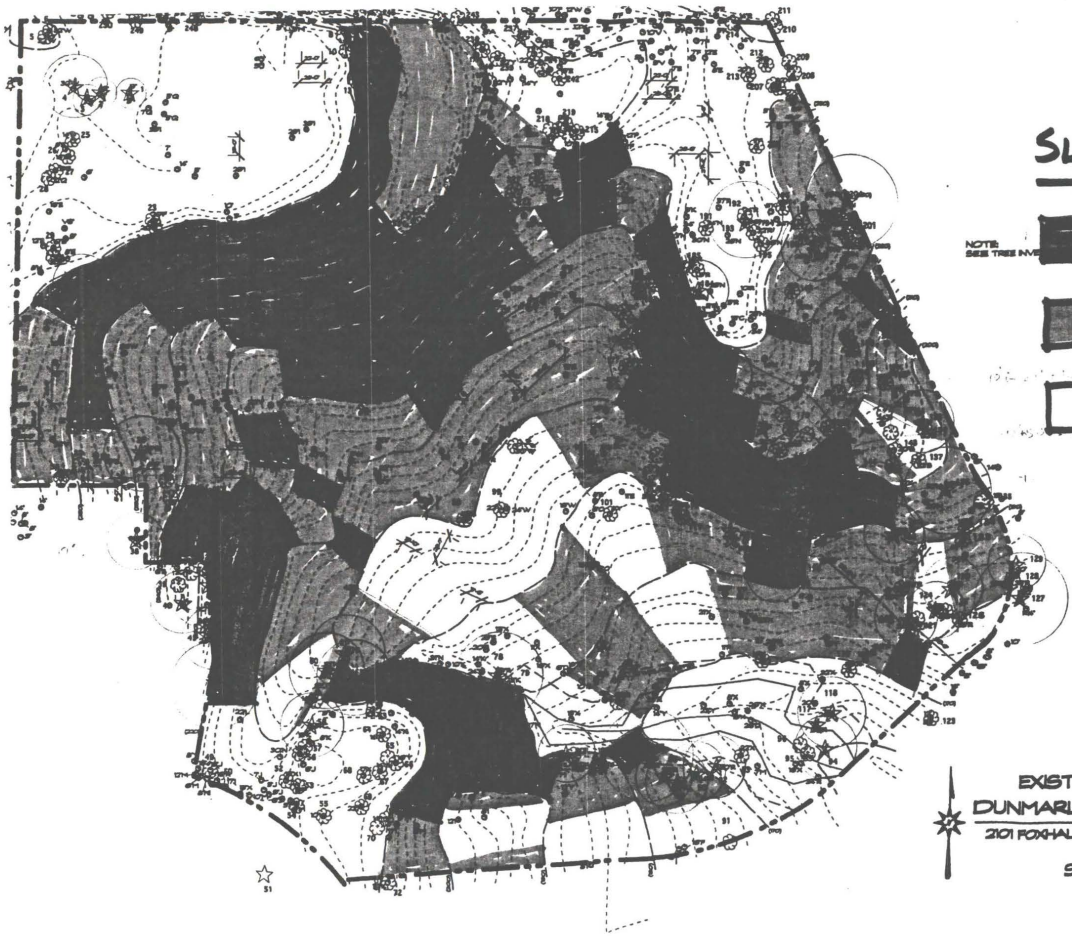
Site planning Issues

26. Provide complete and up to date geotechnical data as recommended by Schnabel.
27. Reduce number of lots to avoid negative impact to wetlands and streams.
28. Correct circulation flaw resulting from removal of second W Street entrance.
29. Provide plans and schedule for deeding abandoned 44th St. right-of-way to NPS.
30. Consolidate lots 12 and 13.
31. Conduct peer review by NPS, Potomac Conservancy, Chesapeake Bay Foundation, The Conservation Trust, Sierra Club, or other NGO.


★ ★ ★ Government of District of Columbia
Department of Health
Environmental Health Administration
Bureau of Environmental Quality
Water Quality Division
51 N St. NE, 5th Floor
Washington, DC 200002
(202) 535-2190
Key to Features
Wetlands
Waterbodies
Known Wetlands within the District of Columbia
Identified by Number
Source: District of Columbia Wetland Conservation Plan, 1997
Note:
1. Delineation based on 1996 field reconnaissance
2. Wetland boundaries shown are intended for planning purposes and do not reflect jurisdiction under Section 404 of the Clean Water Act.
3. Wetlands shown do not include the Potomac and Anacostia open water areas.
3 0 3 6 Miles
Projection: UTM spheroid Clarke 1866 Zone: 18 Date: January, 2001

29	Anacostia Park at 11th Street Bridge	16-H5	76-59'-16"	38-52'-16"
30	East bank of Anacostia River opposite Washington Navy Yard	16-E,F,G6	77-00'-09"/59'-07"	38-52'-24"/52'-11"
31	Anacostia Park near old greenhouses	16-F7	76-59'-47"	38-51'-58"
32	Anacostia Park near old greenhouses	16-E7	77-00'-04"/59'-56"	38-52'-06"/51'-55"
33	St. Elizabeths Hospital along western property boundary	16-G10	76-59'-15"	38-50'-47"
34	Floodplain of Oxon Run east of Valley Avenue	16-G12	76-59'-17"/58'-58"	38-50'-17"
35	Oxon Creek at I-295 bridge	22-A,B5	77-01'-24"	38-48'-14"
36	Rock Creek Park between Beach and Parkside Drive	3-H11	77-03'-11"/02'-39"	38-59'-10"/58'-54"
37	Whitehaven Park	9-C11	77-04'-33"	38-54'-53"
38	Glover-Archibald Park at Whitehaven Tributary	9-C10	77-04'-55"	38-55'-03"
39	Glover-Archibald Park at Reservoir Road	9-C11	77-04'-43"	38-54'48+"
40	C&O Canal Park at Chain Bridge	8-H8,9	77-06'-53"/06'-12"	38-56'-03"/55'-15"
41	C&O Canal Park south of Fletchers Boathouse	8-K11	77-06'-03"	38-54'-49"
42	East side of Roosevelt Island	15-E1	77-03'-41"/03'-32"	38-53'-56"/53'-12"
43	Roosevelt Island south of Memorial Bridge	15-E1	77-03'-33"	38-53'-26"
44	West side of Roosevelt Island	15-E1	77-03'-51"	38-53'-43"
45	Potomac River at Boundary Channel and Memorial Bridge	15-E2	77-03'-48"	38-53'-27"
46	South Dakota & Hamilton Avenue at Riggs Plaza Apts.	10-E4	77-00'-00"	38-57'-15"
47	Soldiers and Sailors Home	10-C7	77-00'-58"	38-56'-12"
48	Soldiers and Sailors Home	10-B8	77-01'-04"	38-55'-59"


B
PHILLIPS WETLANDS / SPRINGS:
EASTERN SPRING?
WETLAND RIDGE
WESTERN SPRING
EASTERN WETLAND
WESTERN WETLAND
PERENNIAL STREAM
DRIGGS ROAD
SOUTHERN WETLAND
INTERMITANT STREAMS
EXISTING CONDITIONS
DUNMARLIN AT PHILLIPS PARK
SCALE: 1" = 100'



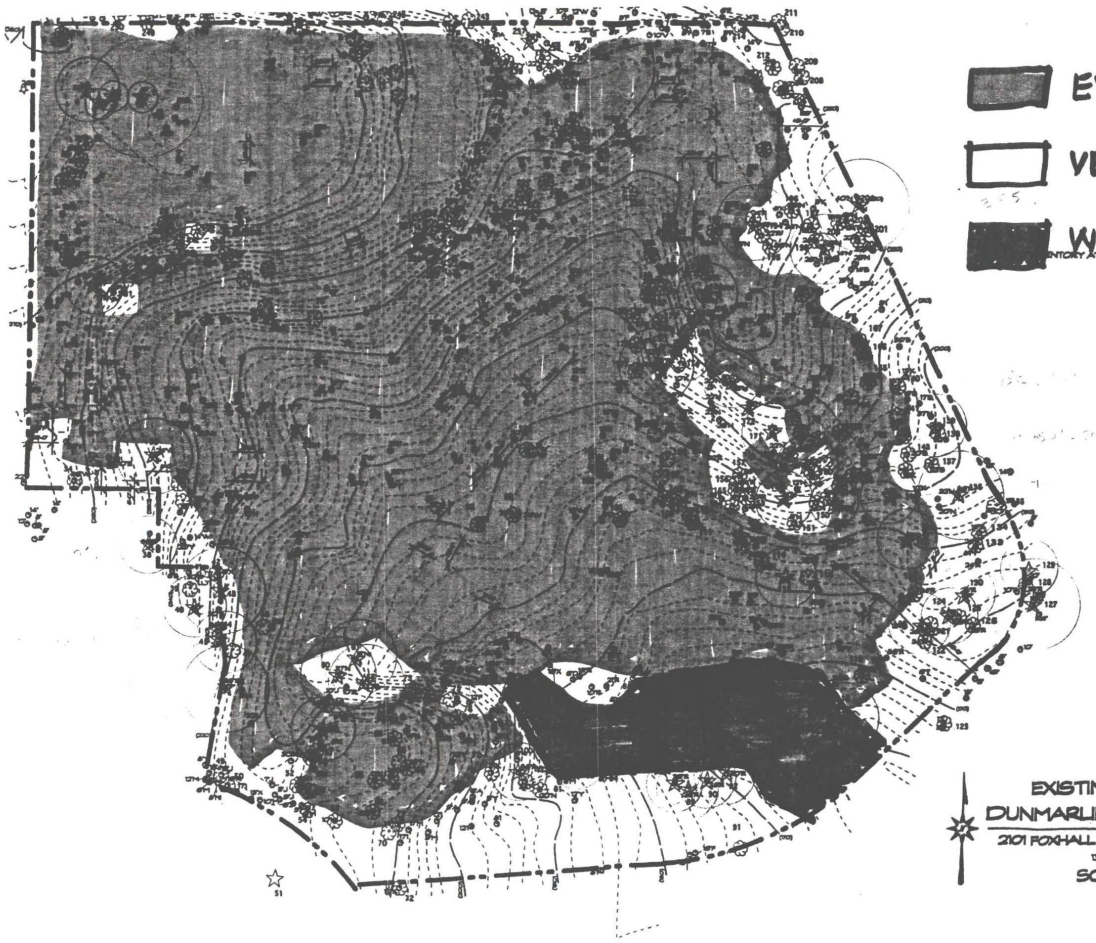
SLOPE ANALYSIS

SLOPES > 20%

SLOPES 10-20%

SLOPES < 10%

EXISTING CONDITIONS
DUNMARLIN AT PHILLIPS PARK
2101 FOXHALL ROAD WASHINGTON, D.C.
13 OCTOBER 2004
SCALE: 1" - 100'



EXTENT OF GRADING

VEGETATION TO REMAIN

WETLAND & BUFFER

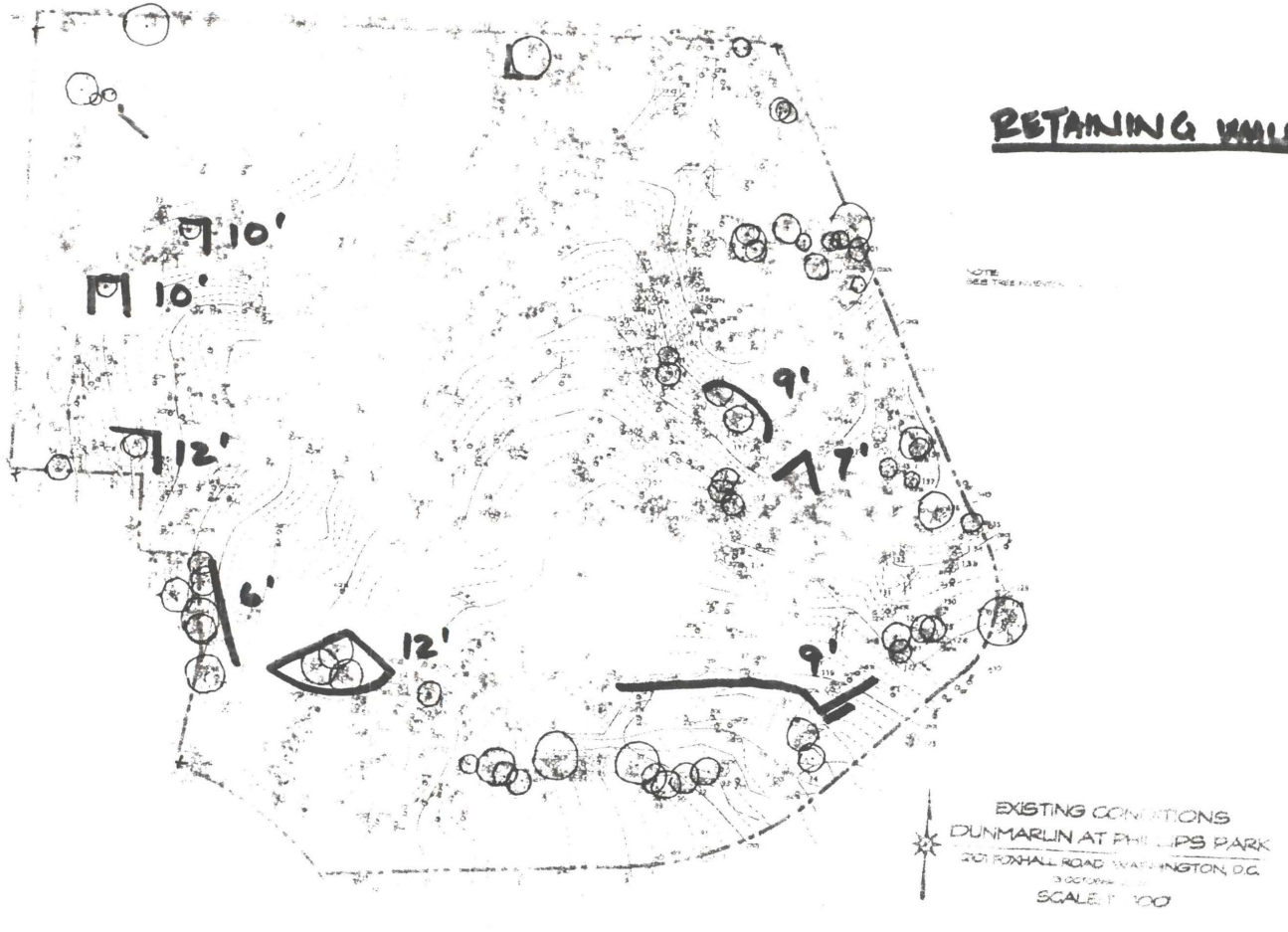
EXISTING CONDITIONS

DUNMARLIN AT PHILLIPS PARK

2101 FOXHALL ROAD WASHINGTON, D.C.

13 OCTOBER 2004

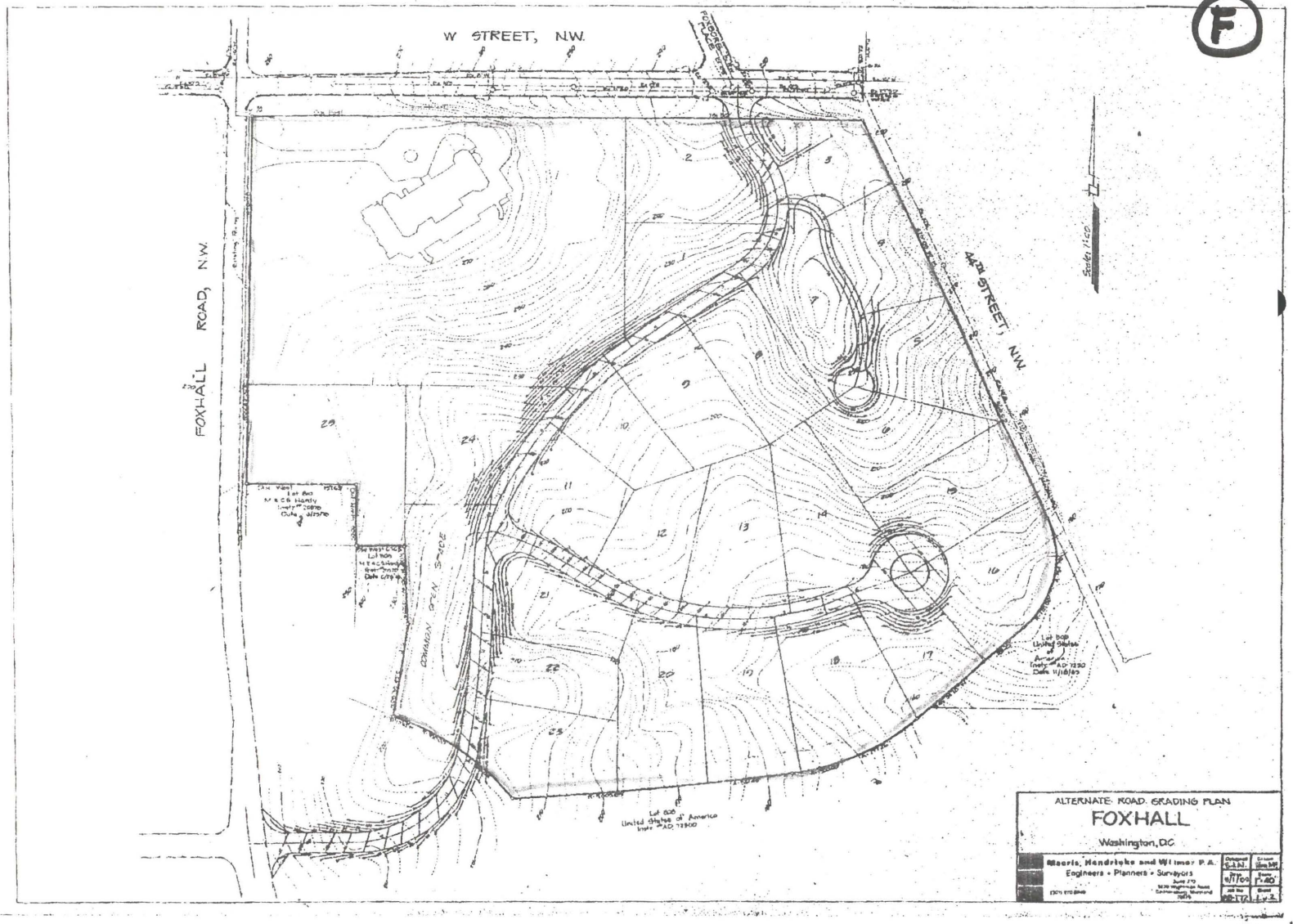
SCALE: 1" = 100'



(E)

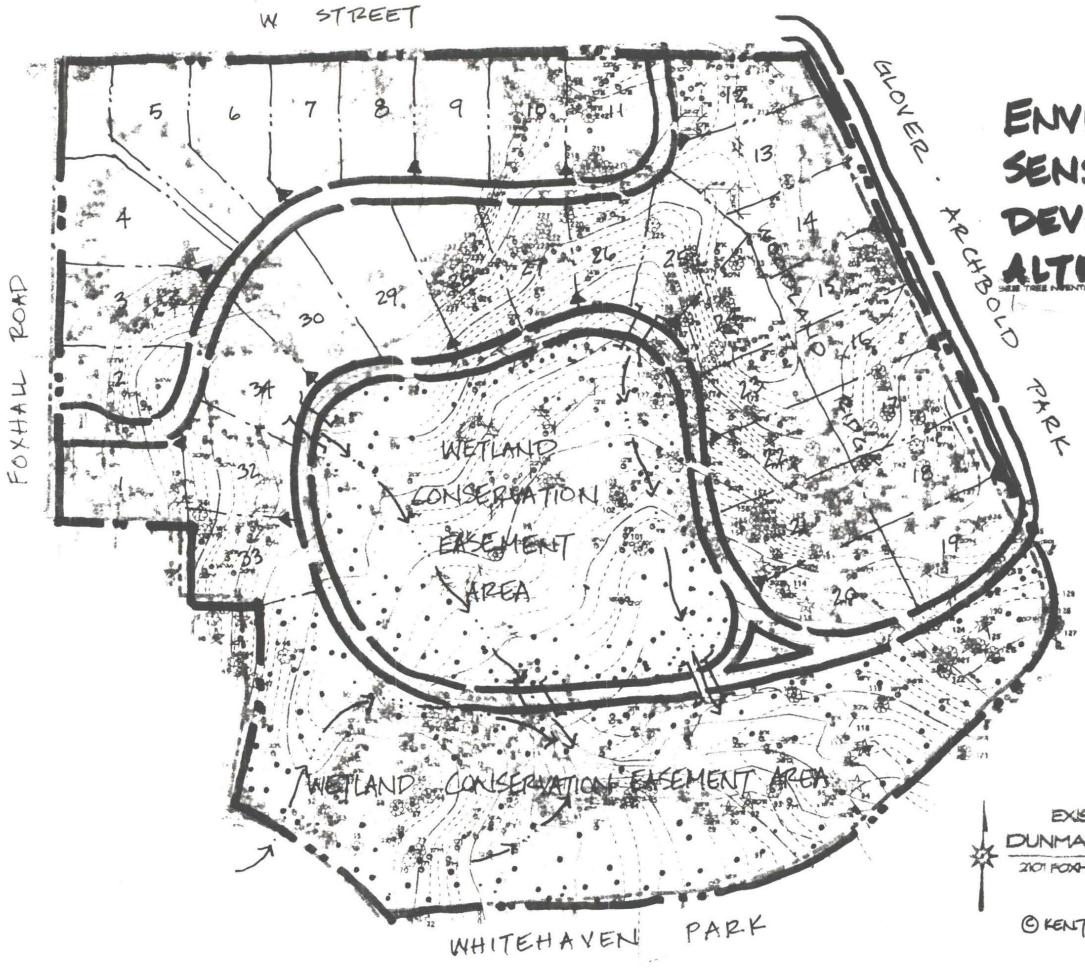
RETAINING WALLS:

(m)


W STREET, N.W.
FOXHALL ROAD, N.W.
44TH STREET, N.W.
Scale 1:40
COMMON OPEN SPACE
Lot 800
United States of America
Inst. 7230
Date 11/18/83
Lot 800
United States of America
Inst. 7230
Date 11/18/83
ALTERNATE ROAD GRADING PLAN
FOXHALL
Washington, DC
Morris, Hendrickson and Wilmer P.A.
Engineers • Planners • Surveyors
Designed G.J.N.
Drawn
Date 9/17/09
Scale 1"=40'
Job No 08-170
Sheet 1 of 1

F

11



ENVIRONMENTALLY SENSITIVE DEVELOPMENT ALTERNATIVE

(G)

SEE TREE INVENTORY ATTACHED

EXISTING CONDITIONS
DUNMARLIN AT PHILLIPS PARK
2101 FOXHALL ROAD WASHINGTON, D.C.
15 OCTOBER 2004
SCALE: 1" - 100'

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