

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

ATTORNEYS AT LAW

ATLANTA
BOSTON
CHICAGO
LOS ANGELES
MINNEAPOLIS
NAPLES
ORANGE COUNTY
SAINT PAUL
WASHINGTON, D. C.

SUITE 1200
1801 K STREET, N.W.
WASHINGTON, D. C. 20006-1301
TELEPHONE (202) 775-0725
FACSIMILE (202) 223-8604
TELEX 4931197 RKMC
www.rkmc.com

RICHARD B. NETTLER
(202) 736-2720

April 5, 2002

Ms. Jerrily Kress
Director
Office of Zoning
441 4th Street, NW, Suite 210
Washington, DC 20001

Re: Proposed Zoning Overlay/Emergency Request
Our File No. 092206.0000

Dear Ms. Kress:

Attached is a petition for the creation of a tree and slope overlay district to be mapped in the Forest Hills area, which we are submitting on behalf of the Forest Hills Citizens Association. Given the prospects for development in the short term which would be inconsistent with the character of the area which the Overlay is trying to preserve, we hereby request that this Overlay District be considered by the Zoning Commission as an emergency measure.

We have attempted to keep the Office of Planning informed of our intentions, and have sent them an earlier version of the proposed text. Concurrent with this submission, we are also submitting a copy of the revised version to them as well. We respectfully request that the Zoning Commission consider setting down the Overlay for public hearing at its April 19 meeting.

Enclosed is a copy of the proposed text, a map showing the proposed boundaries, Sanborn maps indicated existing improvements and lot sizes, a "Focus Area" map prepared by the Office of Planning, and a topographical map prepared by the Office of Planning, which indicates that a substantial portion of the Overlay area encompasses slopes of 25% or greater.

D.C. OFFICE OF ZONING
2002 APR - 5 PM 3:28

#1

ZONING COMMISSION
District of Columbia
CASE NO.02-19
EXHIBIT NO.1

Ms. Jerrily Kress
April 5, 2002
Page 2

Thank you for your attention to this matter.

Sincerely,

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

A handwritten signature in black ink, appearing to read "Richard B. Nettler". The signature is fluid and cursive, with the first name "Richard" and last name "Nettler" being the most legible parts.

Richard B. Nettler

cc: Andrew Altman, Office of Planning
Advisory Neighborhood Commission 3F



Forest Hills Citizens Association

Dedicated to the enhancement, maintenance, protection, and promotion of
a positive community spirit in the Forest Hills neighborhood.

April 5, 2002

Ms. Jerrily Kress, Director
Office of Zoning
441 4th Street, N.W.
Suite 210
Washington, D.C. 20001

Dear Ms. Kress:

I hereby authorize the firm of Robins, Kaplan, Miller & Ciresi
to file the Petition for a Tree and Slope Overlay District on behalf
of the Forest Hills Citizens Association.

Very truly yours,

Barbara M. Simons

Barbara M. Simons
President
Forest Hills Citizens
Association

ym

PETITION TO ZONING COMMISSION
FOR ADOPTION OF FOREST HILLS OVERLAY DISTRICT

I BACKGROUND

Description of the Area. The Forest Hills Citizens Association represents property owners in the Forest Hills section of the District of Columbia who have joined together to petition the Zoning Commission to amend the zoning regulations by adopting the Overlay described herein. Appendix A contains the actual proposed Overlay text. The Overlay is designed to preserve the wooded, steeply-sloped, semi-rural character of the neighborhood, and to protect against the subdivision of the large number of remaining developable pieces of property, which would undermine that character.

The proposed Overlay District is bounded by Connecticut Avenue and Thirty-second Street on the west and Rock Creek Park on the east, south of Fort Circle National Park and Nevada Avenue, N.W., and north of Melvin C. Hazen Park. It covers all or part of Squares 2030 through 2033, 2041 through 2043, 2046, 2049 except for Lots 804 (Van Ness North), 805 (Van Ness Center), 806 (Van Ness South), Square 2231, 2232, 2238, 2239, 2241 through 2251, 2254 through 2256, 2258, 2262 through 2270, 2272, 2274 through 2277, and 2282. Appendix B provides maps showing the proposed boundaries of the Overlay.

Most of the land is zoned R-1-A, with a portion zoned R-1-B, R-2 and R-5-D. The size of the lots varies, with some lots as small as 2,434 sf or less, ranging to over 1,064,520 sf, with several combined holdings over 20,000 sf.

The District of Columbia Generalized Land Use Map of the Comprehensive Plan for the National Capital, as amended, indicates that the area affected by the proposed Overlay District is in the low-density residential land use category.

Historic Character of the Area. Many portions of the area are quite heavily forested, and it would appear that the topography has not been disturbed in any major way since its great height and steep slopes made it an ideal site for a civil war fort and gunnery at Fort Circle. A more detailed assessment of the historic resources in the area is currently being compiled, and will be submitted subsequently.

Brief History of the Tree and Slope Overlay. In 1992, in Order No. 713, the Zoning Commission approved the creation of a tree and slope overlay, to protect the Woodland-Normanstone area adjacent to Rock Creek Park. In its order, the Commission concurred in the report of the Office of Planning suggesting that the proposed Woodland Normanstone Overlay be made generic, so that it could be applied to other areas. The Commission concluded:

...the TSP (Tree and Slope Protection) Overlay is an appropriate means of maintaining the integrity of neighborhoods that are adjacent to streams and parks. The commission further believes that the TSP Overlay will help preserve the natural topography and

mature trees to the maximum extent feasible in a residential neighborhood, and will prevent significant adverse impact on adjacent open space, parkland, stream beds or other environmentally sensitive natural areas. (DC Register, March 20, 1992, p. 1943)

§1511.4 of the TSP lays out the criteria where its application would be appropriate:

The TSP Overlay District is designed for residential neighborhoods that have a significant quantity of steep slopes, have stands of mature trees, are located at the edge of stream beds or public open spaces, and have undeveloped lots and parcels subject to potential terrain alteration and tree removal. It is not suitable for mapping on neighborhoods where nearly all lots are already developed on a rectangular grid system and where the existing mature trees are either yard trees or street trees.

As will be explained in more detail below, the criteria established for the application of the TSP are precisely applicable in this case. The Zoning Commission subsequently adopted the Chain Bridge Road/University Terrace Overlay to accomplish the same purpose. *See* 11 D.C.M.R. § 1565.

II. THE PROPOSED OVERLAY IS CONSISTENT WITH THE COMPREHENSIVE PLAN

The Comprehensive Plan provides strong support for the restriction of development in these types of areas. Clear direction is provided in Title VII, the Urban Design Element:

Sec. 705. Natural Environment Objective

The natural environment objective is to conserve and protect environmentally valuable and sensitive areas that contribute to the design framework of the District.

Sec. 706. Policies in Support of the Natural Environment Objective

The policies established in support of the natural environment objective are as follows:

- (1) Enhance the natural setting of the District; and
- (2) Encourage appropriate design solutions that contribute to the conservation of the natural resources of the District.

Sec. 707. Objective for Areas with Severe Building Constraints

The objective for areas with severe building constraints is to restrict and sensitively design developments placed on severe slopes and unstable soils.

Sec. 708. Policies in Support of the Objective for Areas with Severe Building Constraints

The policies established in support of the objective for areas with severe building constraints are as follows:

- (1) Undertake protective design measures;
- (2) Minimize grading that removes top soil and vegetation, retain vegetation as much as possible, and establish new vegetation where severe erosion damage has already occurred;
- (5) Restrict development on unstable soils with slopes over 25%, such as Rock Creek Valley and related stream valleys.**

Sec. 710. Policies in Support of the Streams and Stream Valley Objectives

The policies established in support of the streams and stream valleys objectives are as follows:

- (1) Ensure that development in these areas is minimal and preserve and respect the natural pattern of the District, where possible (Streams and ravines should not be channeled; these should be retained in their natural conditions.);
- (2) Preserve land adjacent to streams and ravines as open spaces with dense vegetation cover (These natural flood drainage channels and buffer zones for the watershed should be protected from the adverse effects of urban uses. The affected areas are adjacent to Rock Creek Park and related stream valley parks, Battery Kemble, Glover-Archbold, Watts Branch, and Oxon Run.);**

The Comprehensive Plan also contains strong language about the importance of stabilizing residential neighborhoods. The Comprehensive Plan, which is the legal basis for zoning in the District, enunciates, as its first principle, the importance of stability for residential neighborhoods.

The successful and creative functioning of neighborhoods is a fundamental concern. Citizen participation in civic

improvement starts from the interest that people have in their neighborhood blocks and the day-to-day relationships therein. District services are primarily directed to homes and their environs.

The District elements of the Plan propose that the residential character of neighborhoods be maintained and improved.

Ensuring good quality neighborhoods is of utmost importance to the District. (Sec. 101. Major Themes)

In Title 11, the Land Use Element, the Plan gets quite specific. Section 1103. Objectives for Residential Neighborhoods, states:

The residential neighborhood objectives are to conserve the essentially satisfactory qualities of the District's many stable residential neighborhoods, to enhance other neighborhoods to improve and achieve stability, to redirect public and private initiatives to neighborhoods most in need of improvement and stability, to encourage development of adequate neighborhood shopping and support services in all sections of the District, to protect residential neighborhoods from disruptive uses and to prevent concentrations of non-residential uses in residential neighborhoods.

Policies in support of these objectives include three which are directly relevant to this case:

- (1) Promote the conservation, enhancement and revitalization of the residential neighborhoods of the District for housing and neighborhood-related uses;
- (2) Conserve and maintain the District's sound, established neighborhoods through the strict application and enforcement of housing, building, and zoning codes and the **maintenance of the general level of existing residential uses**, densities, and heights.
- (8) Develop techniques and programs, including rezoning and modification of certain zoning Regulations if required, for the most effective use of the District's land to add to the housing stock, encouraging where appropriate additional row housing and apartment development . . . **while exercising great care to avoid undermining neighborhood quality and stability;**

(See Section 1105. Policies in Support of the Residential Neighborhoods Objectives.)

These excerpts from the Comprehensive Plan point out that the preservation of existing stable neighborhoods is one of the most important underlying principles of the Plan. This was

felt by the Council to be the case in 1984, when the Plan was adopted. It is even more imperative today, when the District is faced with increasing development pressures on established neighborhoods and with the continuing flight of District residents, especially middle and upper class citizens, to the suburbs. The protection of residential areas such as this is especially important given the property, income and sales tax revenue generated by these types of middle-class neighborhoods.

III. APPLICABILITY OF THE TREE AND SLOPE OVERLAY TO THE PROPOSED AREA

Overlay Criteria. The proposed FH /TSP Overlay District clearly meets the criteria provided in § 1511.4 above. It is steeply sloped, with a 25% or greater slope. The slopes run in many directions as indicated by the attached topographical map.

There are many stands of mature trees, and the eastern portions of the Overlay District are either immediately adjacent to Rock Creek Park, or separated from the Park by only narrow roads. In addition, Broad Branch runs to the north, east and through the area.

There are many undeveloped parcels, including approximately 240 lots which are larger than 12,000 sf, many of which are 20,000 sf or more. There are at least sixteen parcels of 60,000 sf or above.

As a result of the large wooded lots, and the steep slopes, the area has a park-like, semi-rural character which is extremely rare in the District. It is environmentally sensitive, since it lies immediately to the west of Rock Creek Park and Rock Creek, which are adversely affected by any run-off, and carry it out to the Chesapeake Bay.

It is also important to note that many of the roads in the area are extremely narrow and winding, with very poor visibility on some of the curves. This is a particular safety hazard since there are no sidewalks for pedestrians. Neighborhood residents must walk in the roadway to visit the Park or their neighbors, or simply go for a stroll. Any substantial increase in development in the area would either greatly increase the safety hazards to pedestrians, or would require a widening of some of the streets, which would adversely affect the character of the area, and would contribute to the environmental degradation of the area through increasing water run-off.

Development Pressures. There are beginning to be considerable pressures for subdivision. In the last few years, individual lots have been subdivided, and two or three additional structures erected where there had been only one residence or no residences previously. The property at the intersection of Albemarle Street and Twenty-ninth Street, which currently houses one residence, has been sold to a residential developer who has taken down all the mature trees and is planning on putting up a number of houses. The same developer has bought other large lots in the area for the same purpose. The slope of the subject properties are such that substantial alteration of the existing topography will be necessary, and there is great concern from those who are below the subject property about drainage, erosion and water runoff.

IV. PROPOSED OVERLAY AND HOW IT WILL DEAL WITH DEVELOPMENT CONCERNS

Basic provisions. The proposed overlay takes the major provisions of the TSP Overlay, restrictions on lot occupancy, impervious surface construction and tree removal, and adds some additional protections regarding slope alteration, set backs and lot size, in order to deal with conditions unique to the area.

Slope restrictions. The FH/TSP Overlay prohibits any construction where the slope is 25% or greater, within 20 feet of the footprint of the proposed building. This prohibition, which is the same standard followed in nearby Montgomery County, Maryland, is to effectuate the concern voiced in the original Woodland Normanstone case about the need to protect the existing topography. One of the purposes for the TSP Overlay is listed as:

To preserve the natural topography and mature trees to the maximum extent feasible in a residential neighborhood.

The substantial grading and shoring required for construction on such steep slopes potentially destabilizes the remainder of the slope, risks pouring unacceptable amounts of run-off onto neighbors' property and destroys the mature trees which also stabilize the soil and provide privacy and visual screening for neighbors. The privacy issue can be a particularly serious one, in this type of sloped environment, since construction of residences on the backside of these slopes then provides views from those residences directly down on the residences and yards below them.

The run-off is a serious environmental issue, since storm water run-off washes any petroleum residue on the roadways and driveways along with any fertilizer, de-icing salts, herbicides and pesticides from the residences and yards down the slopes, and directly into Rock Creek Park and Rock Creek, which then deposits them in the Chesapeake Bay via the Potomac River. It is precisely for those reasons that the District is a signatory to a regional agreement to restrict development within 100 feet of stream valleys.

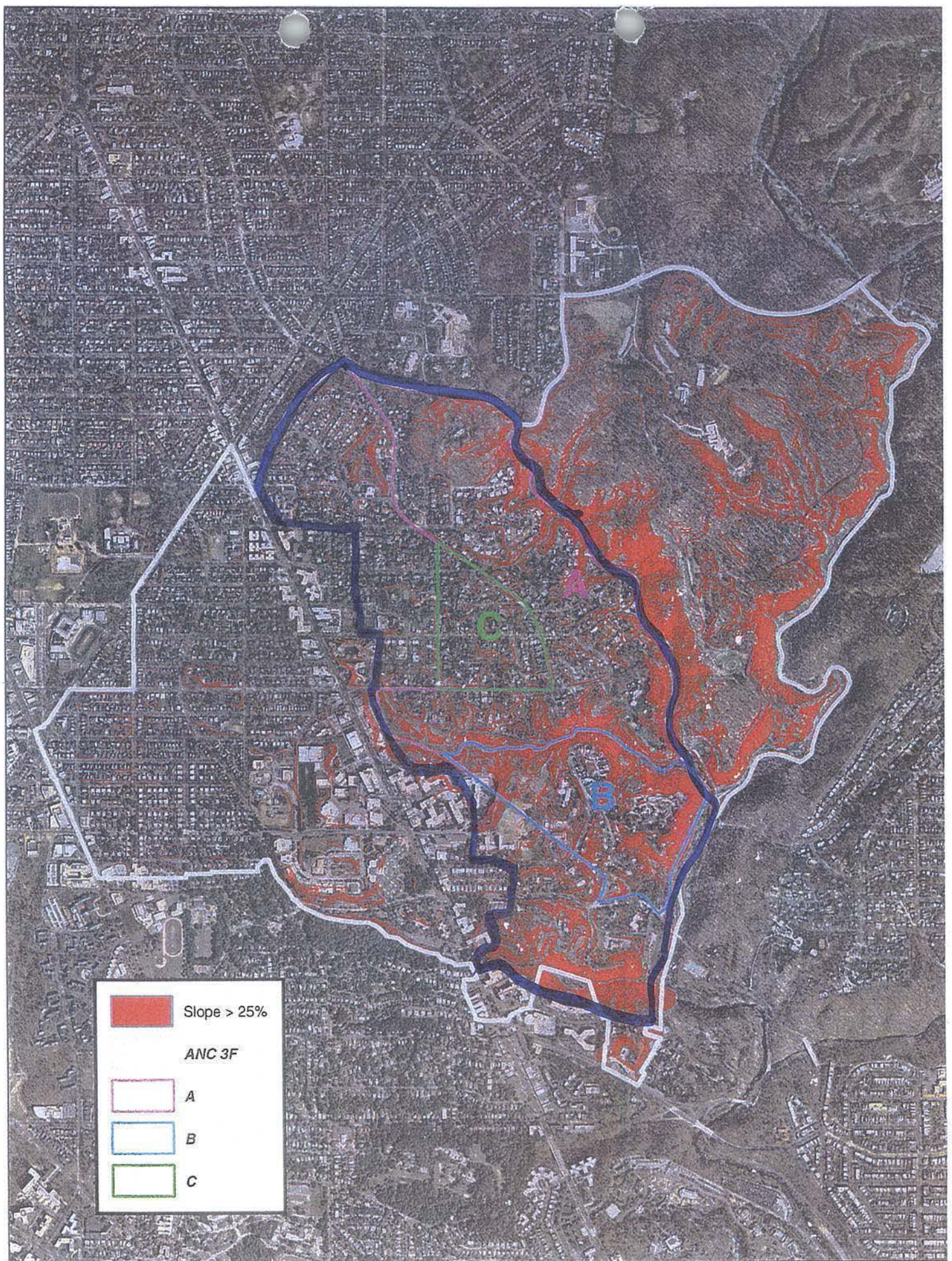
Lot Size Restrictions. The FH/TSP Overlay increases the minimum lot size for new subdivisions or construction on unimproved lots to a minimum of 12,000 sf, with setbacks comparable to those in the neighborhood. These restrictions are seen as necessary to accomplish two important purposes of the tree and slope overlays, to restrict the intensity of development, and to provide for privacy and peaceful enjoyment of property for the existing residents. The FH/TSP Overlay specifically lists as one of its purposes:

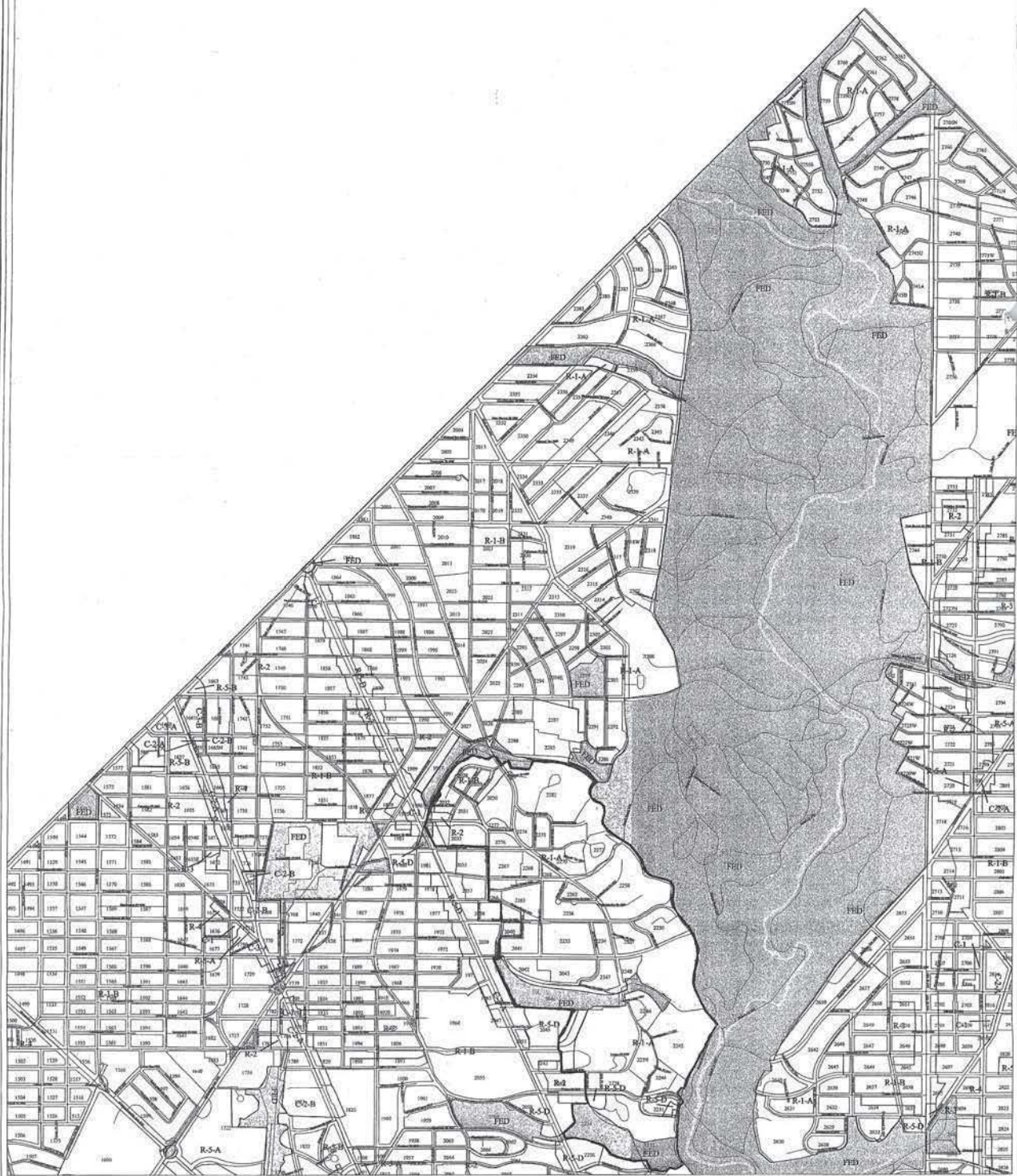
To limit permitted ground coverage of new and expanded buildings and other construction, so as to encourage a general compatibility between the siting of new buildings and the existing neighborhood.

The current restrictions on lot occupancy and impervious surface help in meeting this purpose. In the case of the Forest Hills area, however, it was felt that the environmental sensitivity of the

area and the limited capacity of the transportation infrastructure necessitated further restrictions on development density, which are met by these two provisions.

A



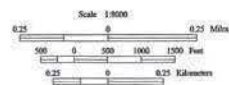


Feature Key

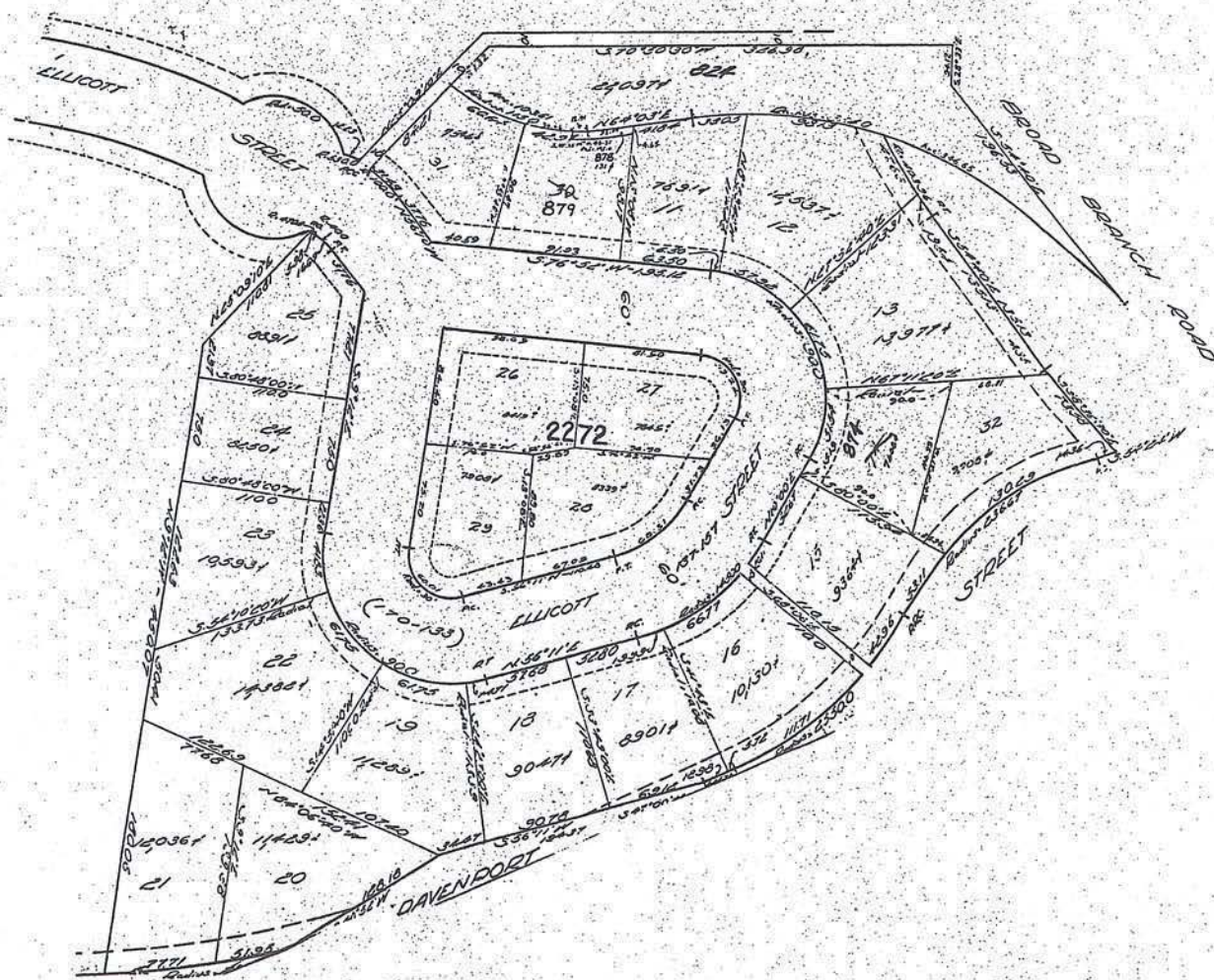
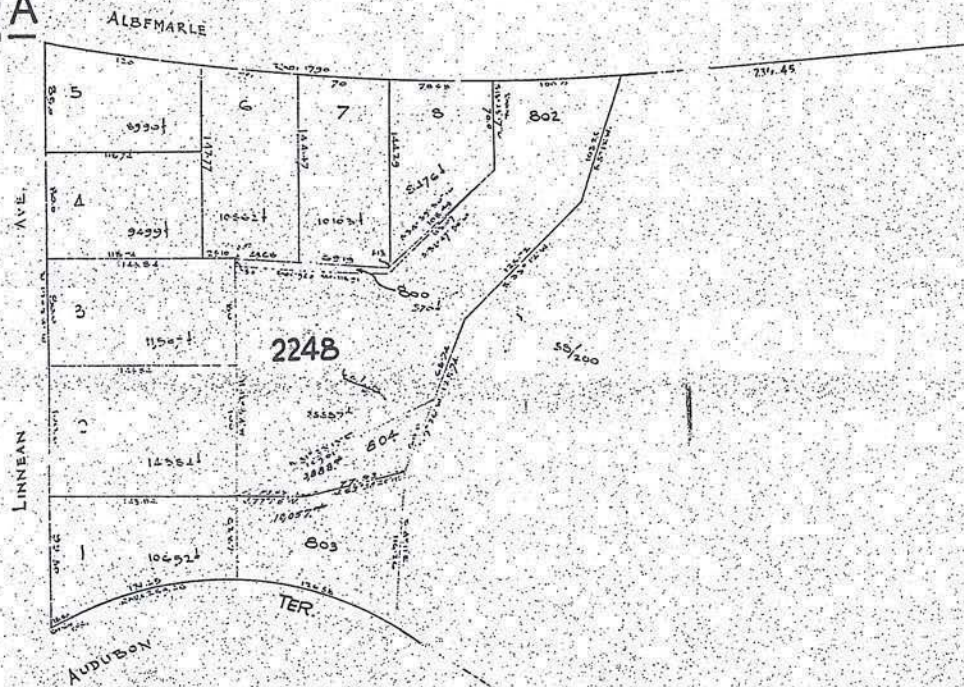
- DC Boundary
- Zoning Boundaries
- Zoning Leader Lines
- Square Miles
- Street Centerlines
- Water Bodies
- Parks

District of Columbia Focus Area

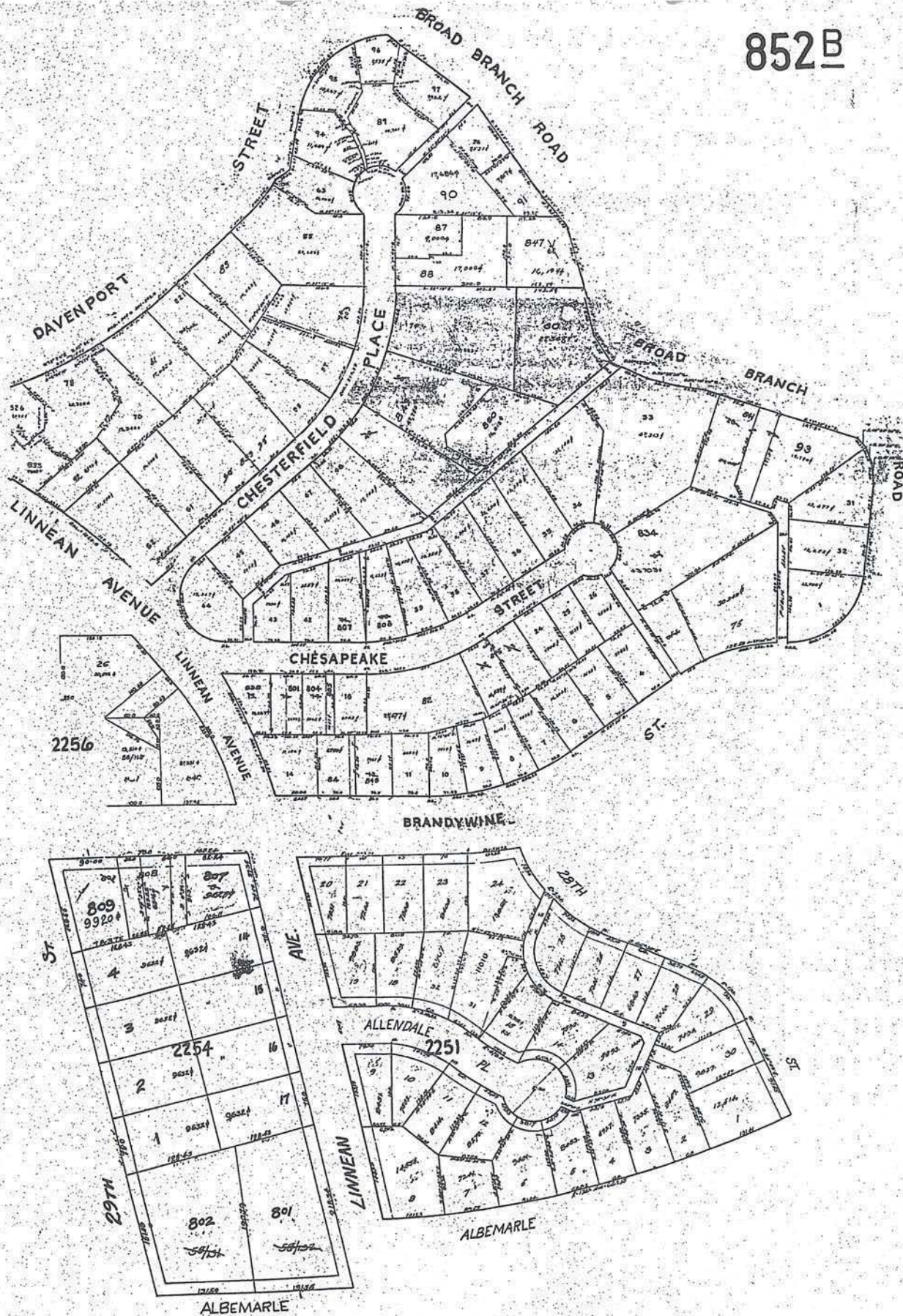
DC Office of Planning
February 5, 2002



852A



852B



852C



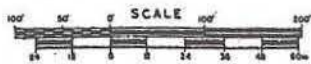
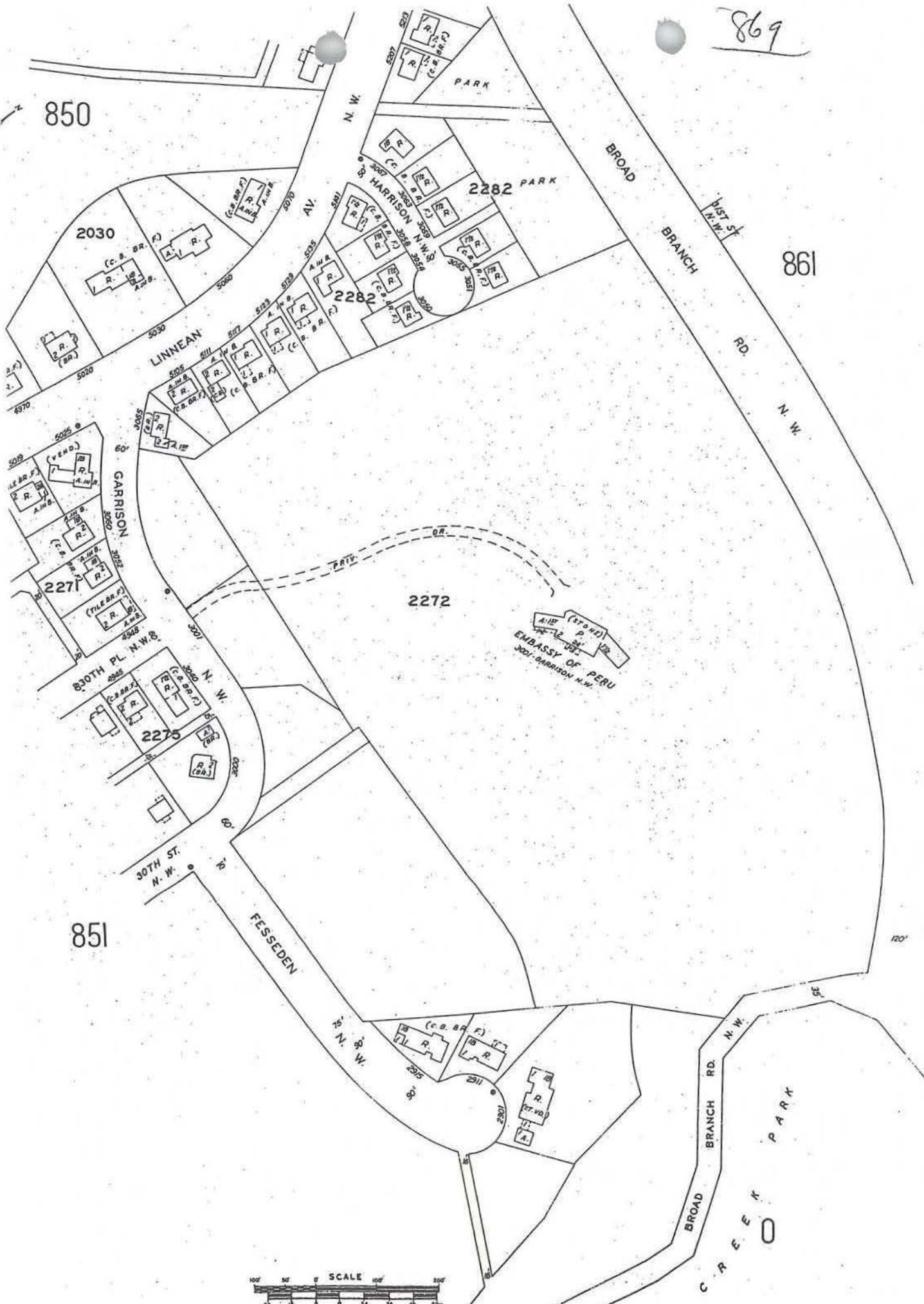
869

850

861

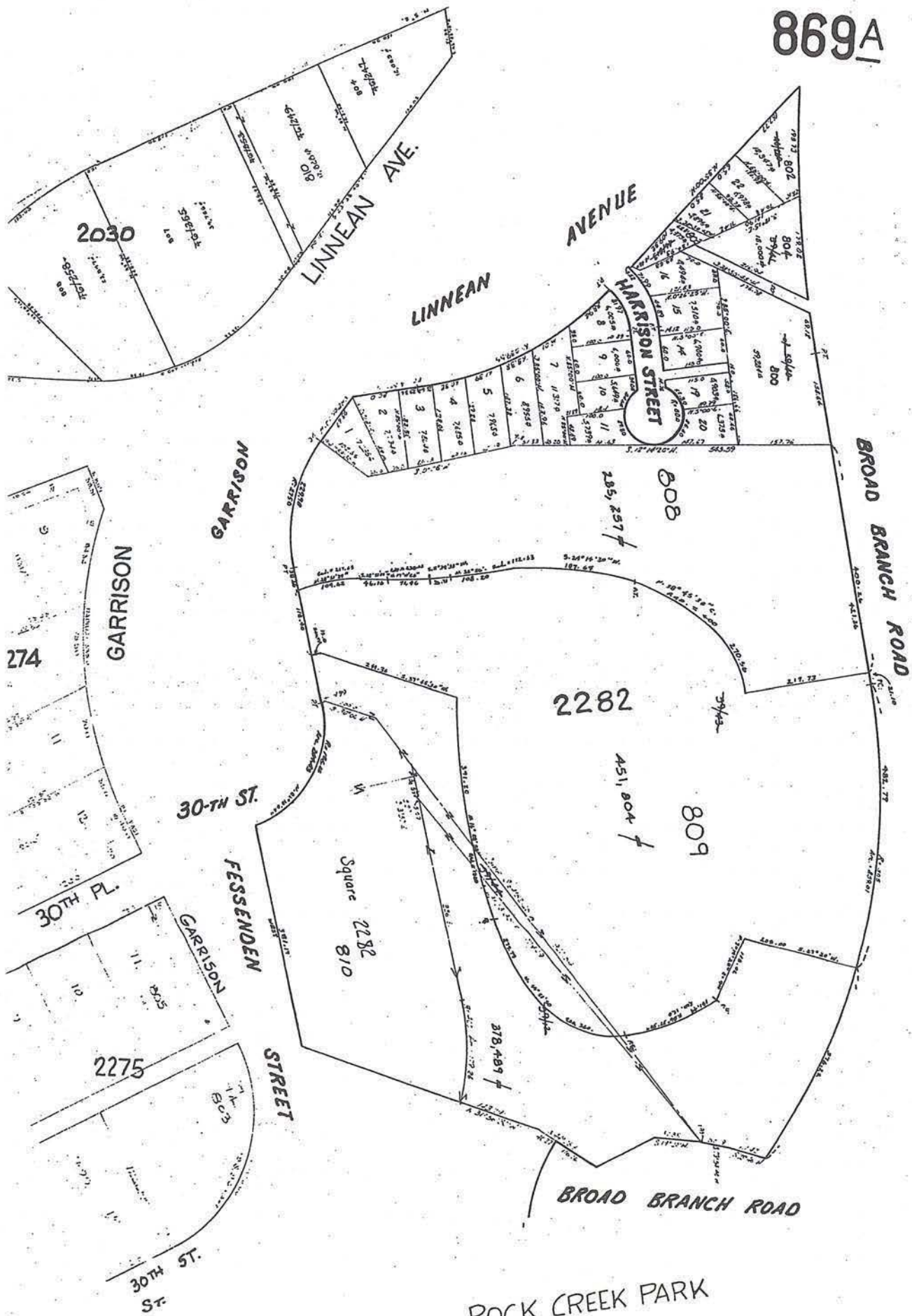
851

852



SANDOR MAP CO INC PHILADELPHIA, PA 19104-1200

869A



873

"A"
1987

AUDUBON 852

SOAPSTONE VALLEY PARK

870

YUMA N.W.



ROCK CREEK PARK
BROAD BRANCH RD. N.W.

ROYAL NETHERLANDS EMBASSY & CHANCERY

2049

CARNEGIE INSTITUTE
GEORGIAN LARY

814

GUPTON

2239

2238

TILDEN

STILTON'S PL. N.W.

EMBASSY OF ZAIRE

2231

LINNEAN

873

ROCK CREEK
PARK
AV. N.W.

2234

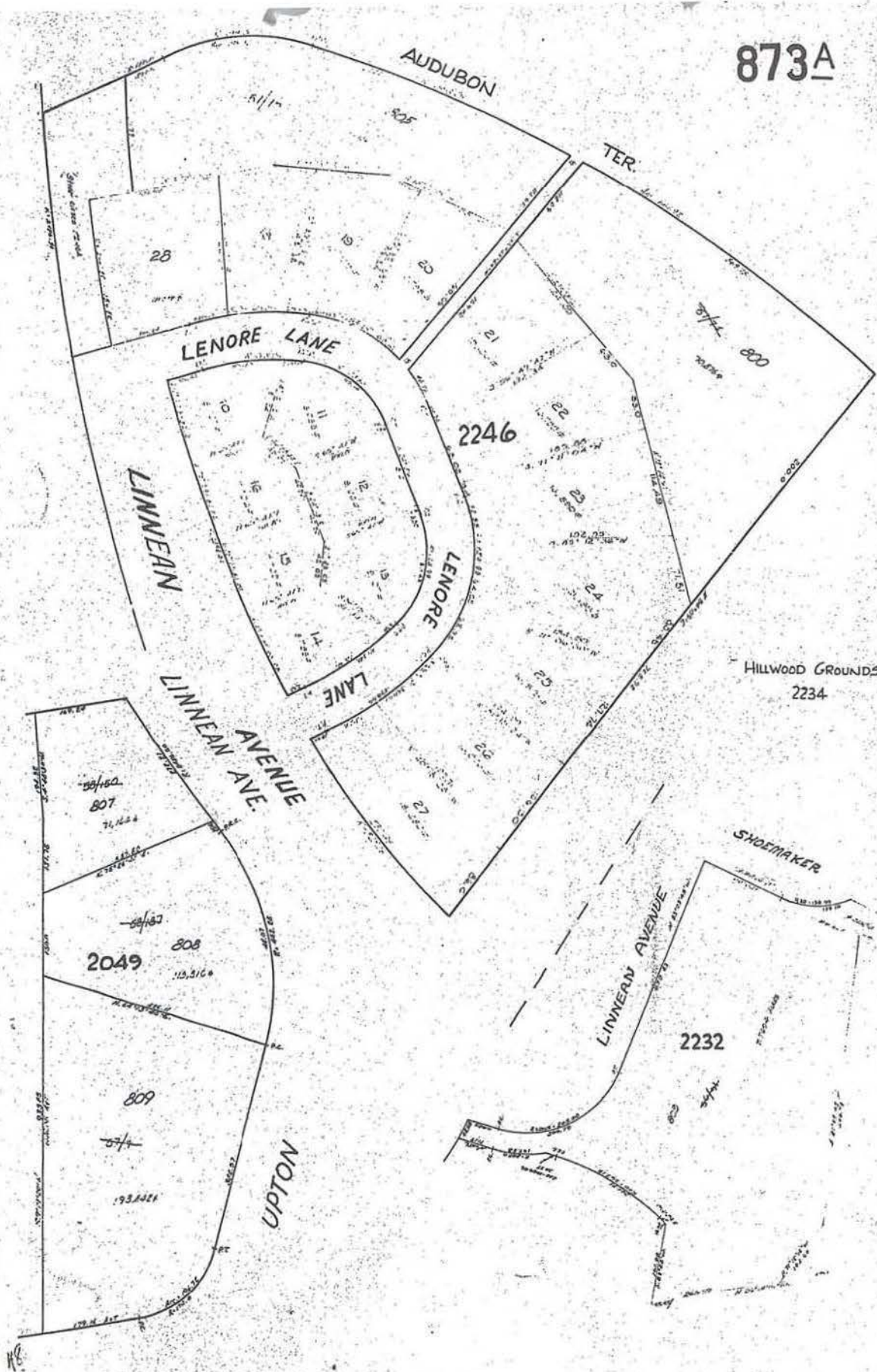
CZECHOSLOVAK EMBASSY

SCALE 1"=100'

SCALE 1"=100'

REPUBLIC OF INDONESIA
EMBASSY

873A



[illegible]



B

FOREST HILLS TREE AND SLOPE OVERLAY REGULATION

[N.B. The following proposed Zoning Overlay Regulation is to be added to 11 DCMR. Section number 1511 et al shown below pertains to the general template and the Normanstone Drive overlays approved by the Zoning Commission (ZC). We retain those numbers in this draft in order to simplify comparison with the ZC's standard template. However, a final Forest Hills regulation would be numbered differently-with its own section numbers.]

Adopt new sections to Chapter 15, to read as follows:

1511 FOREST HILLS TREE AND SLOPE PROTECTION OVERLAY DISTRICT

1511.1 The Forest Hills Tree and Slope Protection (FH/TSP) Overlay District is established to preserve and enhance the park-like setting of designated neighborhoods between Connecticut Avenue and Thirty-second Street on the west and Rock Creek Park on the east, south of Fort Circle National Park and Nevada Avenue, N.W., north of Melvin C. Hazen Park, and adjacent to streams and parks, by regulating alteration or disturbance of terrain, destruction of trees, and ground coverage of permitted buildings and other impervious surfaces. It includes Soapstone Valley Park as well as Melvin C. Hazen Park.

1511.2 The purposes of the FH/TSP Overlay District are to:

- (a) Preserve the natural topography and mature trees to the maximum extent feasible in Forest Hills neighborhoods.
- (b) Prevent significant adverse impact on adjacent open space, parkland, stream beds, or other environmentally sensitive natural areas; and
- (c) Limit permitted ground coverage of new and expanded buildings and other constructions, so as to encourage a general compatibility between the siting of new buildings and the existing neighborhood.

1511.3 The FH/TSP Overlay District has a significant quantity of steep slopes, has stands of mature trees, is located at the edge of stream beds and public open spaces, and has undeveloped lots and parcels subject to potential terrain alteration and tree removal. Few lots are developed on a rectangular grid system, and the existing mature trees are neither limited to yard trees or to street trees.

1512. GENERAL PROVISIONS

1512.1 The FH/TSP Overlay District is mapped in combination with the underlying R-1-A or R-1-B or R-2 or R-5-D residential zone district, and not in lieu of the underlying district.

1512.2 Where there is a conflict between this chapter and the underlying zoning, the more restrictive provisions of this chapter shall govern.

1513 GROUND COVERAGE RESTRICTIONS

1513.1 The principal building and any accessory building on the lot shall not exceed a total lot occupancy of thirty percent (30%).

1513.2 The maximum impervious surface coverage on a lot shall be fifty percent (50%); provided, that the following conditions are met:

- (a) This subsection shall not preclude enlargement of a principal building in existence as of the effective date of this chapter; and
- (b) This subsection shall not create nonconformity of a structure as regulated by chapter 20 of this title.

1514 LIMITATIONS

1514.1 Construction of a building, an accessory building, or an addition to a building, or the creation of any impervious surface area, the subdivision of any unimproved lot, or the subdivision any improved lot so as to increase the number of principal structures thereupon shall be permitted as a matter of right only if the following tree removal limitations are complied with:

- (a) The restrictions of this section against removing, cutting down, or fatally damaging trees apply only to trees having a circumference of twelve (12) inches or greater at a height of four and one-half feet above ground;
- (b) The prohibitions of this section shall not apply to the removal of any dead or unhealthy tree or a tree that creates an unsafe condition. The need for removal of any such tree shall be certified by an arborist or other tree care professional;
- (c) No tree that has a circumference of seventy-five (75) inches or more at a height of four and one-half feet above ground shall be removed or cut down;
- (d) No more than three (3) trees that each have a circumference of more than thirty-eight (38) inches at a height of four and one-half feet above ground shall be removed, and none of these shall be located within twenty-five (25) feet of any building restriction line or lot line abutting a public street;
- (e) The total circumference inches of all trees removed or cut down on a lot shall not exceed twenty-five percent (25%) of the total circumference inches, provided that this restriction shall not abrogate the right to remove up to three (3) trees as provided in paragraph (d); and

- (f) Where removal or cutting of trees has occurred that would be prohibited by this section if a building permit were contemporaneously applied for, no building permit shall be issued for a period of seven years from such removal or cutting unless a special exception is granted by the Board of Zoning Adjustment pursuant to Section 1515.

1514.2 The minimum lot size for homes within the FH/TSP Overlay District shall be 12,000 s.f. for lots subdivided after the effective date of this provision.

1514.3 All residential buildings shall have a front yard setback equal to or greater than the average setback of all structures on the same side of the street in the block where the building in question is located. Where the residential building is sited on a corner lot, the residential building shall be set back from each street on which it borders in an amount that is equal to or greater than the average setback of all structures on the same side of the street in the block where the building in question is located. The required setbacks are depicted in the map entitled, "Required Front Yard Setbacks," which is a part of this overlay district and located in the Office of Zoning and in the Zoning Division of the Department of Consumer Regulatory Affairs.

1514.4 To the extent any residential district within the Overlay requires a side yard, the side yards requirement for all residential buildings within such districts shall be sixteen (16') feet.

1514.5 No person, for the purpose of (i) subdividing any unimproved lot; (ii) constructing any structure on any unimproved lot; (iii) subdividing any improved lot so as to increase the number of principal structures thereon; or (iv) constructing an additional principal structure on a previously subdivided lot, shall alter existing topography, except for placing a foundation for an otherwise permitted structure. If the soil is highly erodible, as determined by the US Geological Survey soils analysis, and the slope anywhere within 20 feet of the footprint of the proposed structure is greater than 25%, then no building or terrain alteration will be permitted. If the soil is highly erodible, as determined by the US Geological Survey soils analysis, then no building or terrain alteration will be permitted if the slope exceeds 15% anywhere within 20 feet of the footprint of the proposed structure.

1515 SPECIAL EXCEPTIONS

Any exception from the requirements of this chapter, as distinct from the requirements of the underlying zoning district, shall be permitted only as a special exception, if approved by the Board of Zoning Adjustment after public hearing, in accordance with the conditions specified in Section 3108 of this title, and subject to the following requirements:

- (a) Tree removal, grading, and topographical change shall be limited to the maximum extent consistent with construction of a building permitted by the standards of this chapter;

- (b) The applicant shall demonstrate that there are specific physical characteristics of the lot that justify the exception;
- (c) The excepted building and overall site plan of the lot shall be generally consistent with the purposes of the TSP Overlay District and not adversely affect neighboring property; and
- (d) The Board may impose requirements as to design, appearance, tree protection practices during construction, buffering, and other requirements as it shall deem necessary to achieve the purposes of this chapter, and may vary side and rear yard requirements in order to achieve the purposes of this chapter.

1515.2 Before taking final action on an application, the Board shall submit the application to the following agencies for review and written reports:

- (a) The Office of Planning;
- (b) The Department of Transportation; Tree Maintenance Division;
- (c) The Department of Recreation and Parks;
- (d) The Department of Health, Soil Erosion Branch; and
- (e) The National Park Service, U.S. Department of Interior.

1515.3 An applicant for an exception shall submit at least the following materials:

- (a) A site plan for development, including computation and illustration of total lot occupancy and impervious surface ratio, and regulated trees proposed to be removed; and
- (b) A plan and statement indicating how trees to be preserved on the lot will be protected during the construction period, including reference to proposed procedures to guard against long-term damage by such factors as soil compaction.

1515.4 Forms and applications pertaining to the FH/TSP Overlay District which are filed with the BZA, the Building and Land Regulation Administration in DCRA or the Zoning Administrator in DCRA shall state that the applicant and the signer will be subject to criminal penalties for false statements and any approval granted on review of a document that fails to include such statement shall be null and void.

1515.5 Refer to the following definitions in 11 DCMR 199.9:

Impervious Surface Coverage - The percentage of the land area of a lot that is covered by impervious surfaces, which percentage shall be determined by dividing the gross impervious surface area of a lot by the total area of the lot

Impervious Surface - An area that impedes the percolation of water into the subsoil and impedes plant growth.

Impervious surfaces include the footprints of principal and accessory buildings, footprints of patios, driveways, other paved areas, tennis courts, and swimming pools, and any path or walkway that is covered by impervious material.

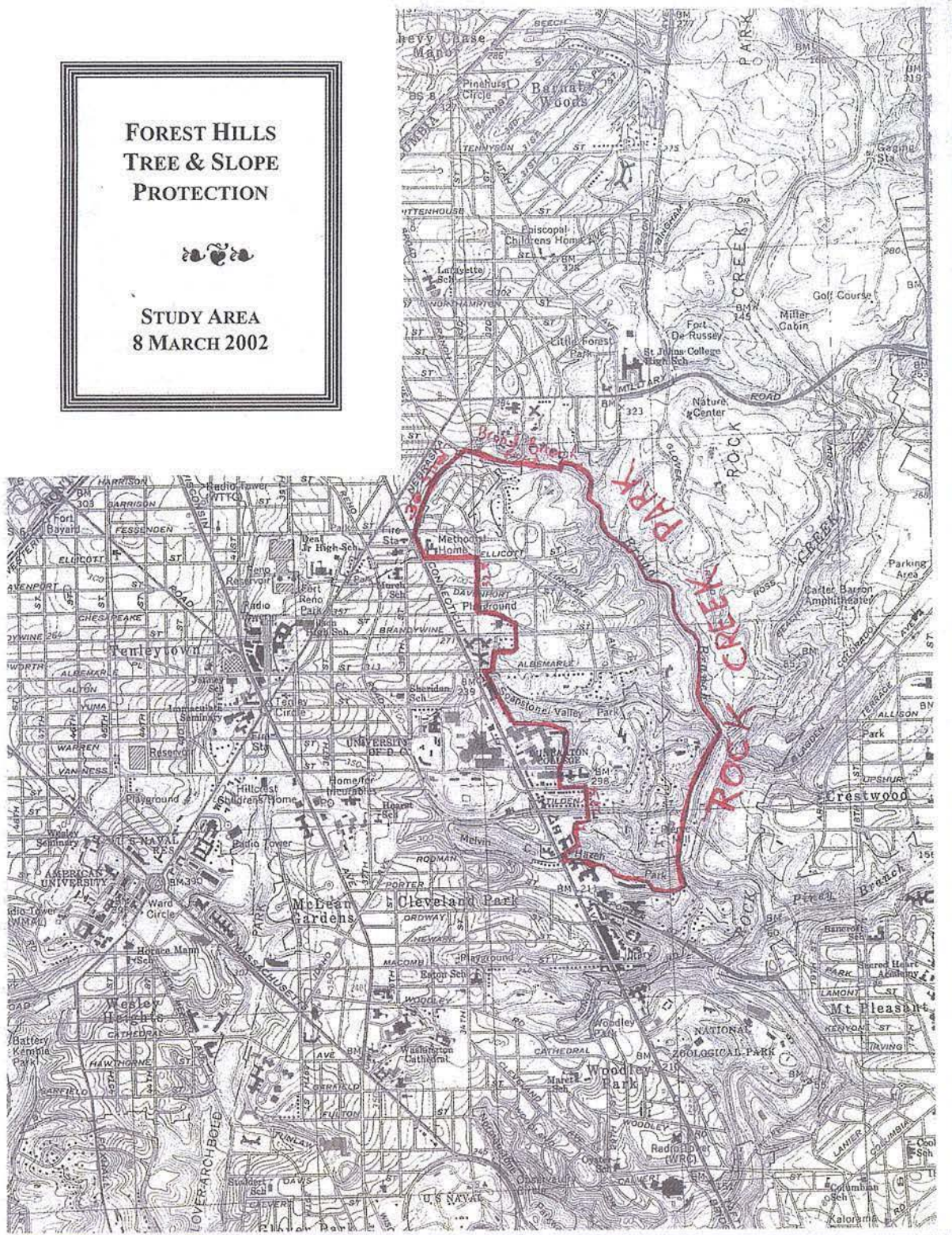
1515.6 Amend the zoning map by including the following squares in the tree and slope protection overlay district:

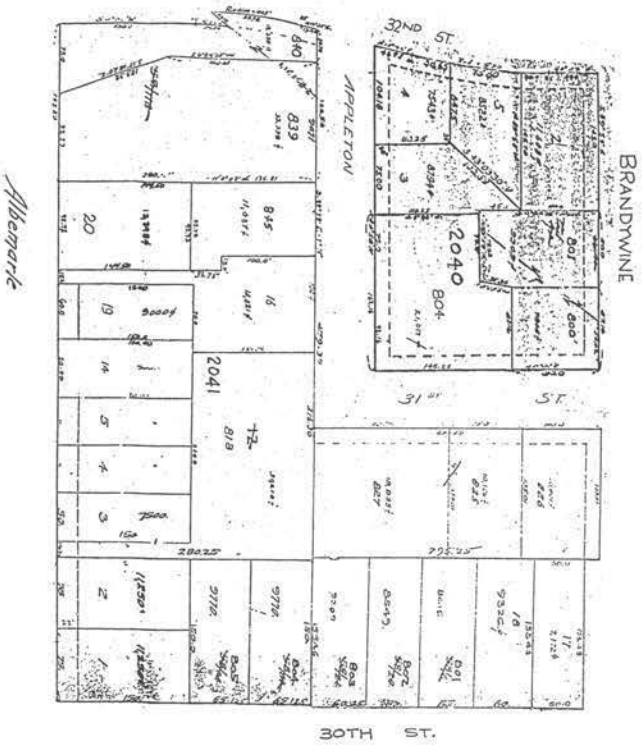
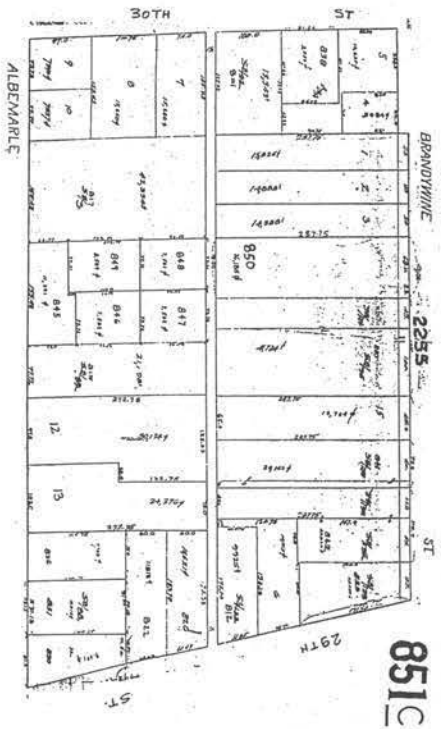
Squares 2030 through 2033, 2041 through 2043, 2046, 2049 except for Lots 804 (Van Ness North), 805 (Van Ness Center), 806 (Van Ness South), Square 2231, 2232, 2238, 2239, 2241 through 2251, 2254 through 2256, 2258, 2262 through 2270, 2272, 2274 through 2277, and 2282.

FOREST HILLS
TREE & SLOPE
PROTECTION



STUDY AREA
8 MARCH 2002

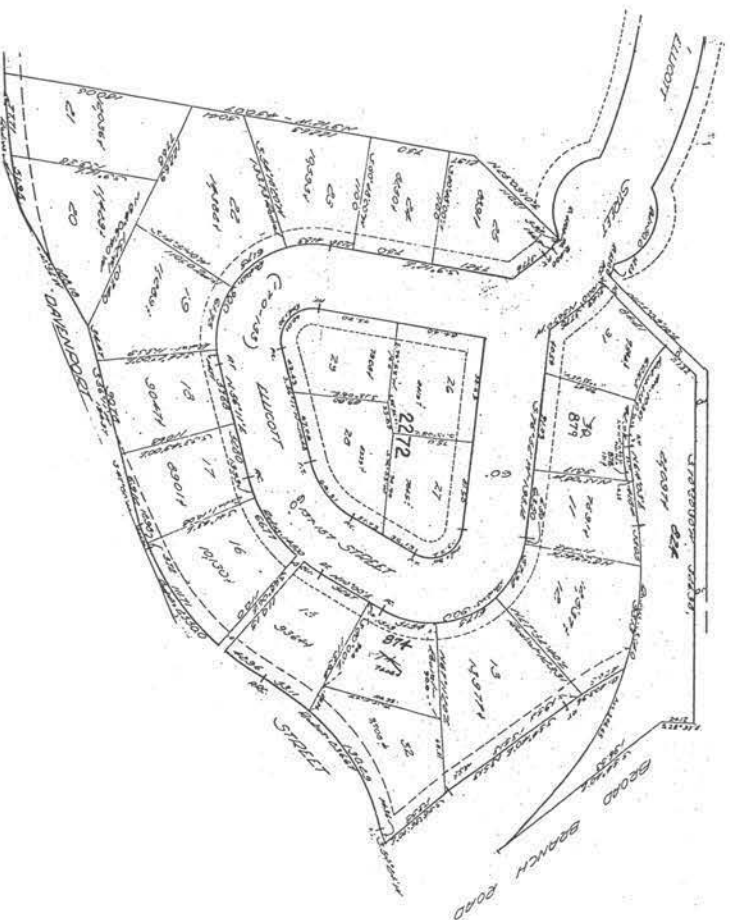


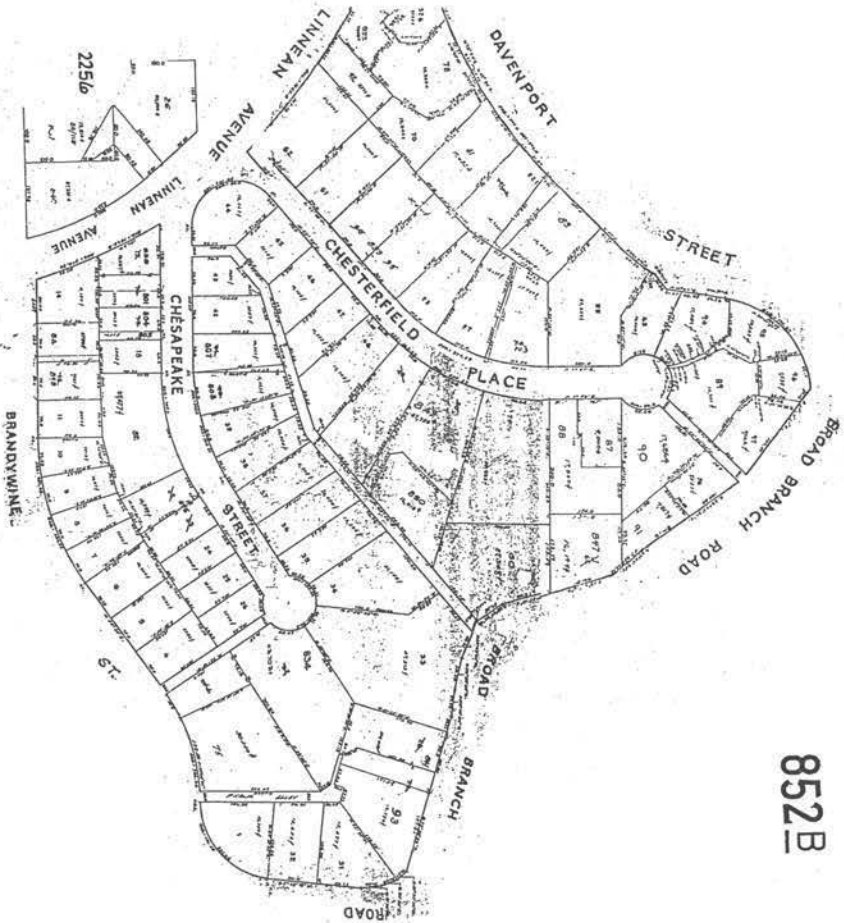




852A

ALBEMARLE

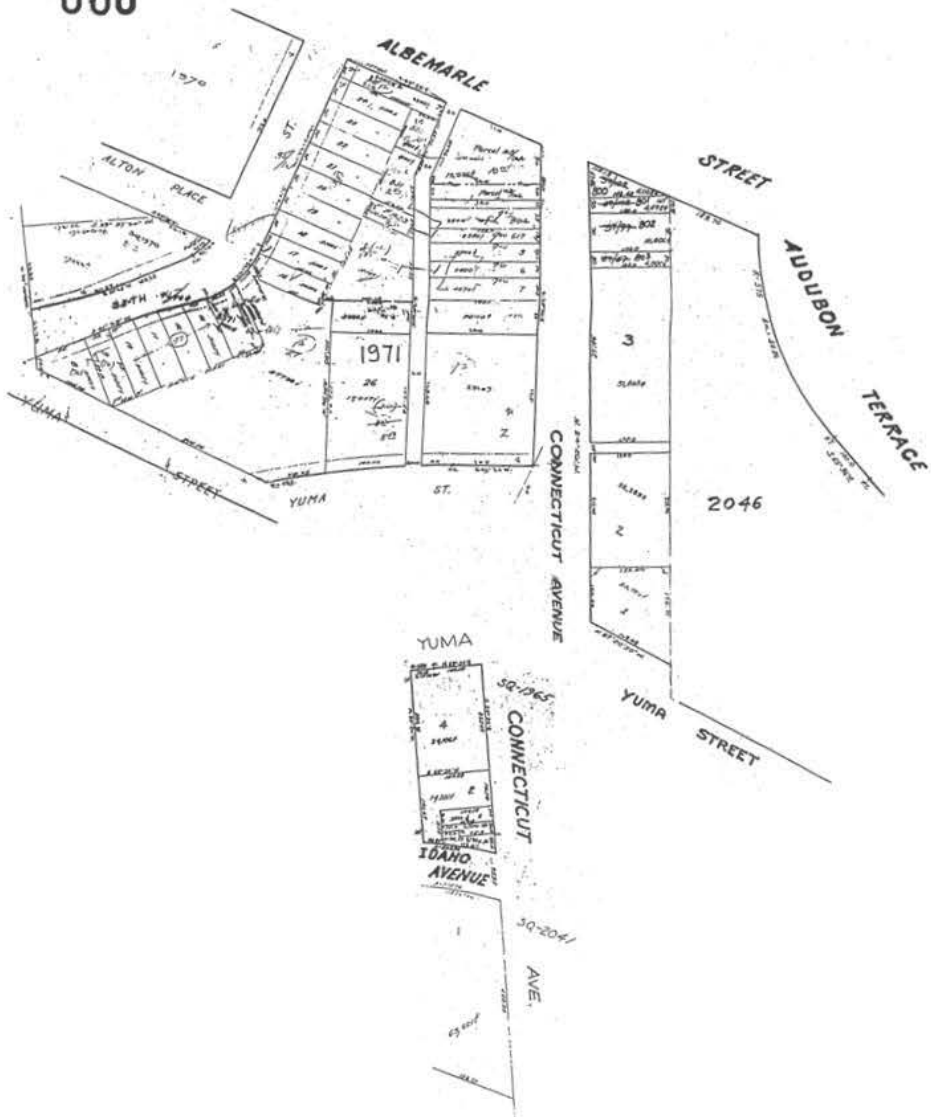


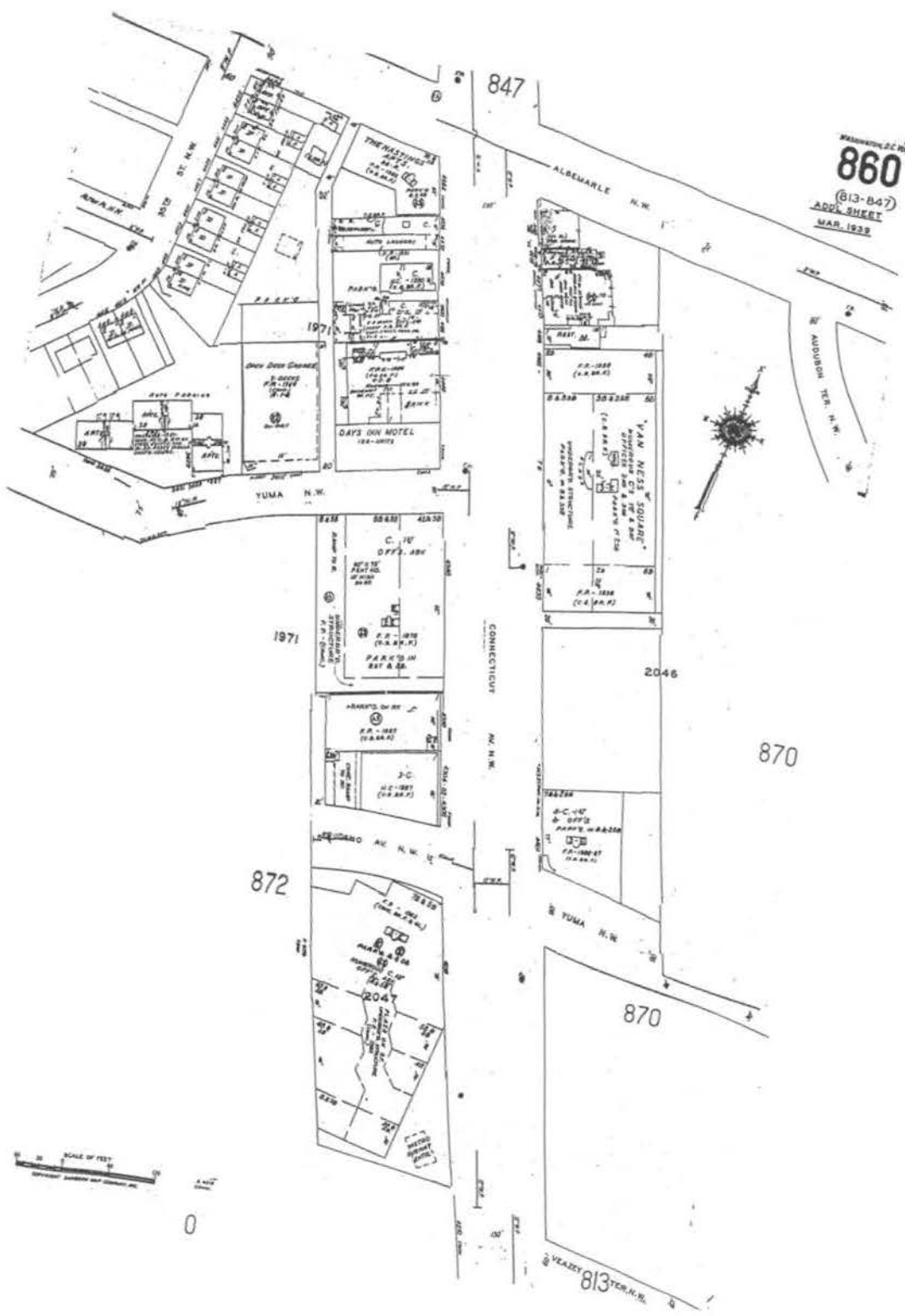


852C



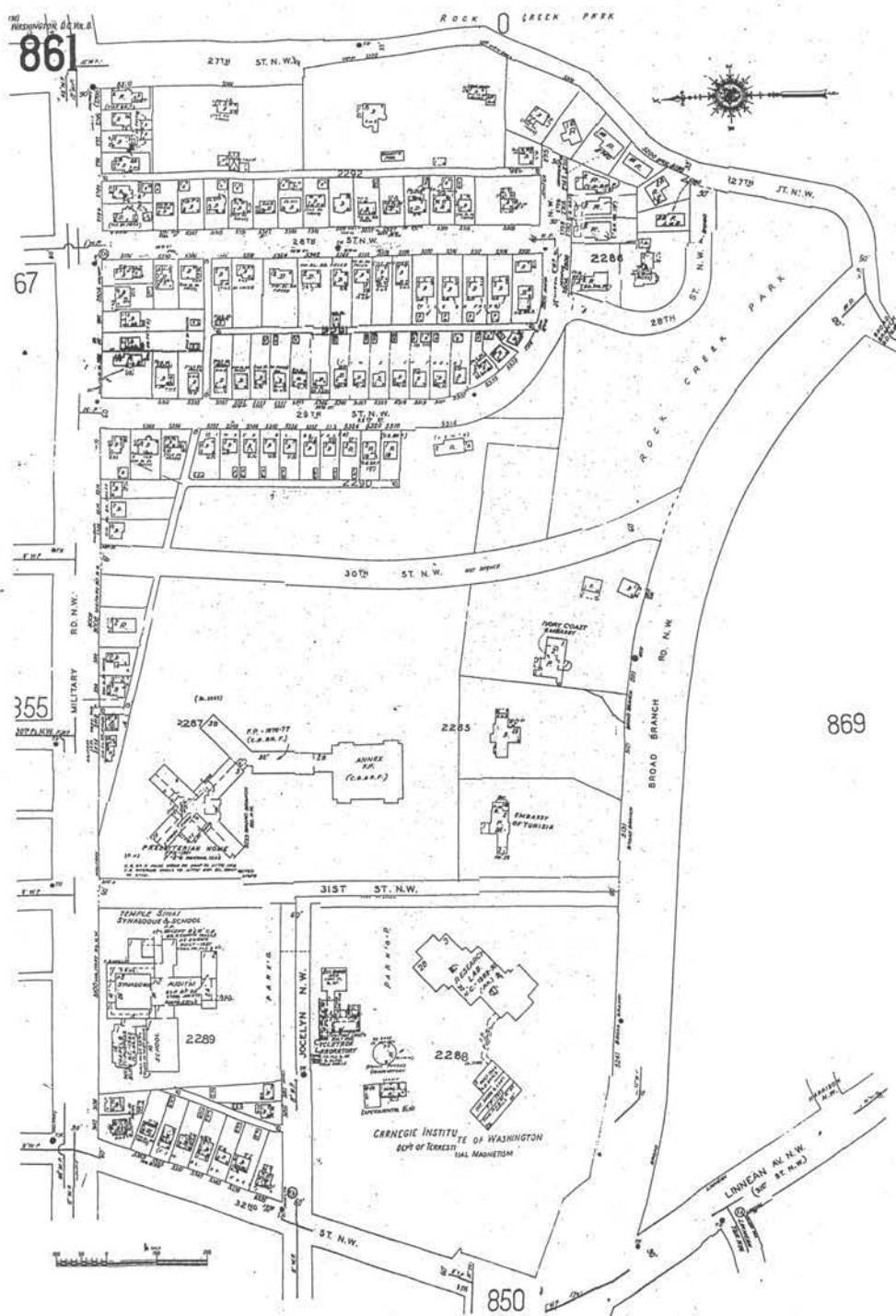
860



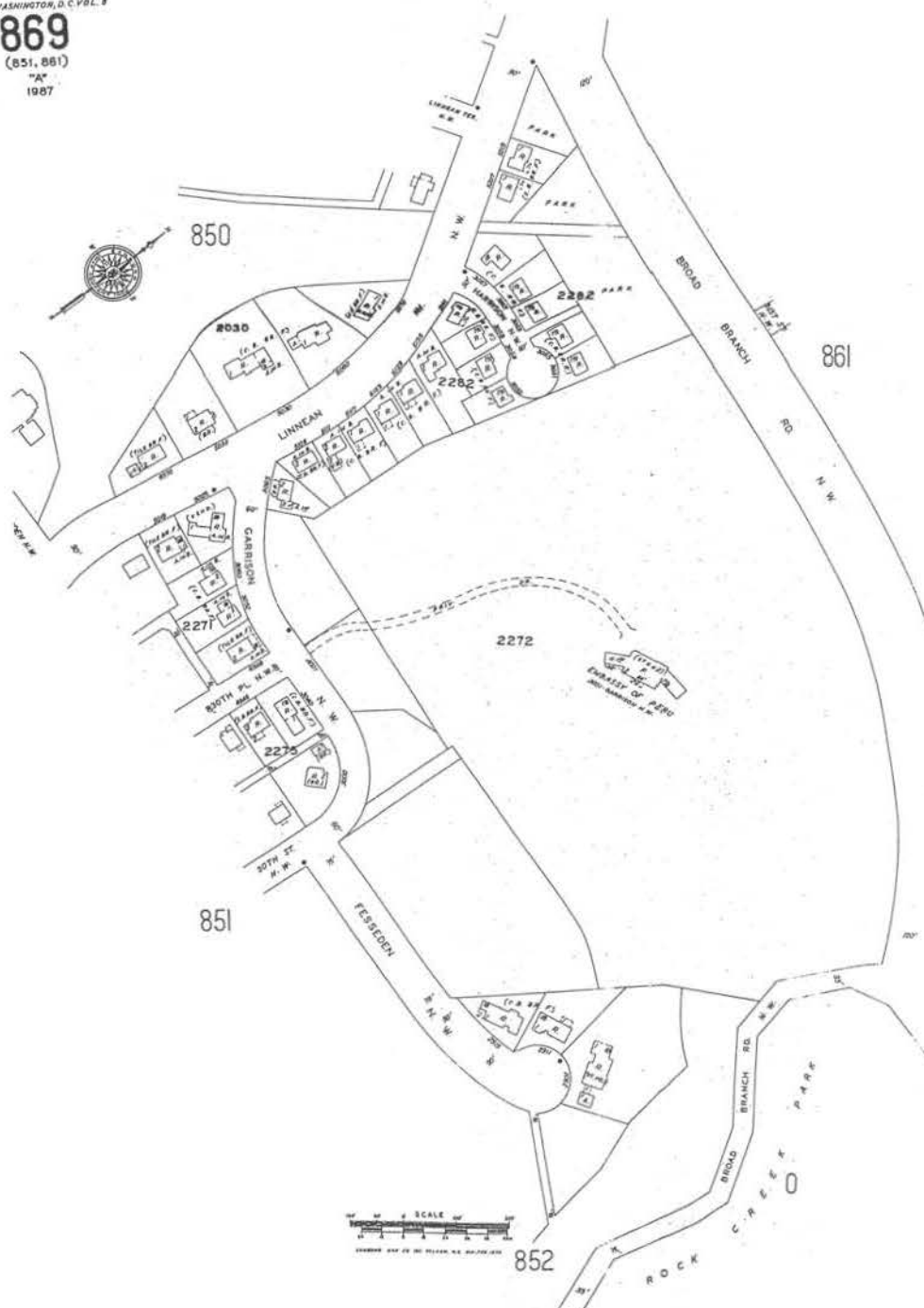


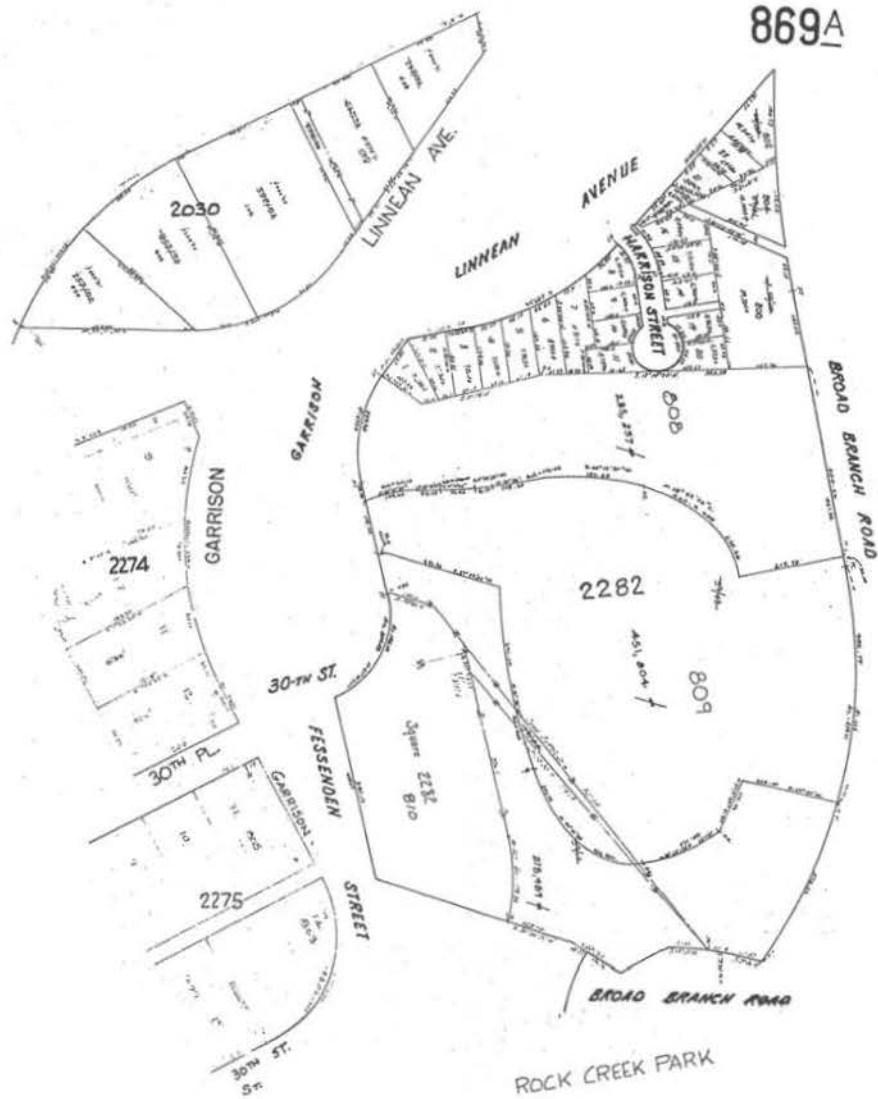
SCALE OF FEET
0 10 20 30 40 50 60 70 80 90 100

0

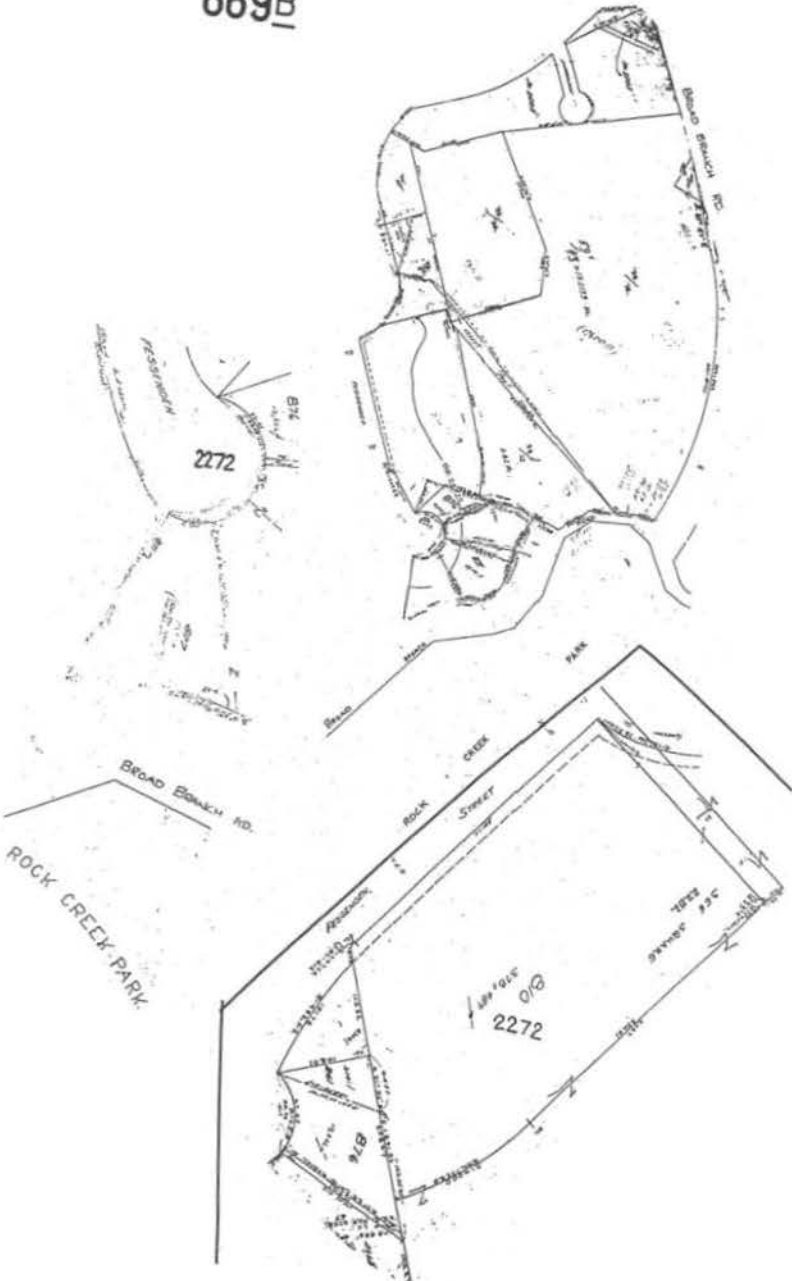


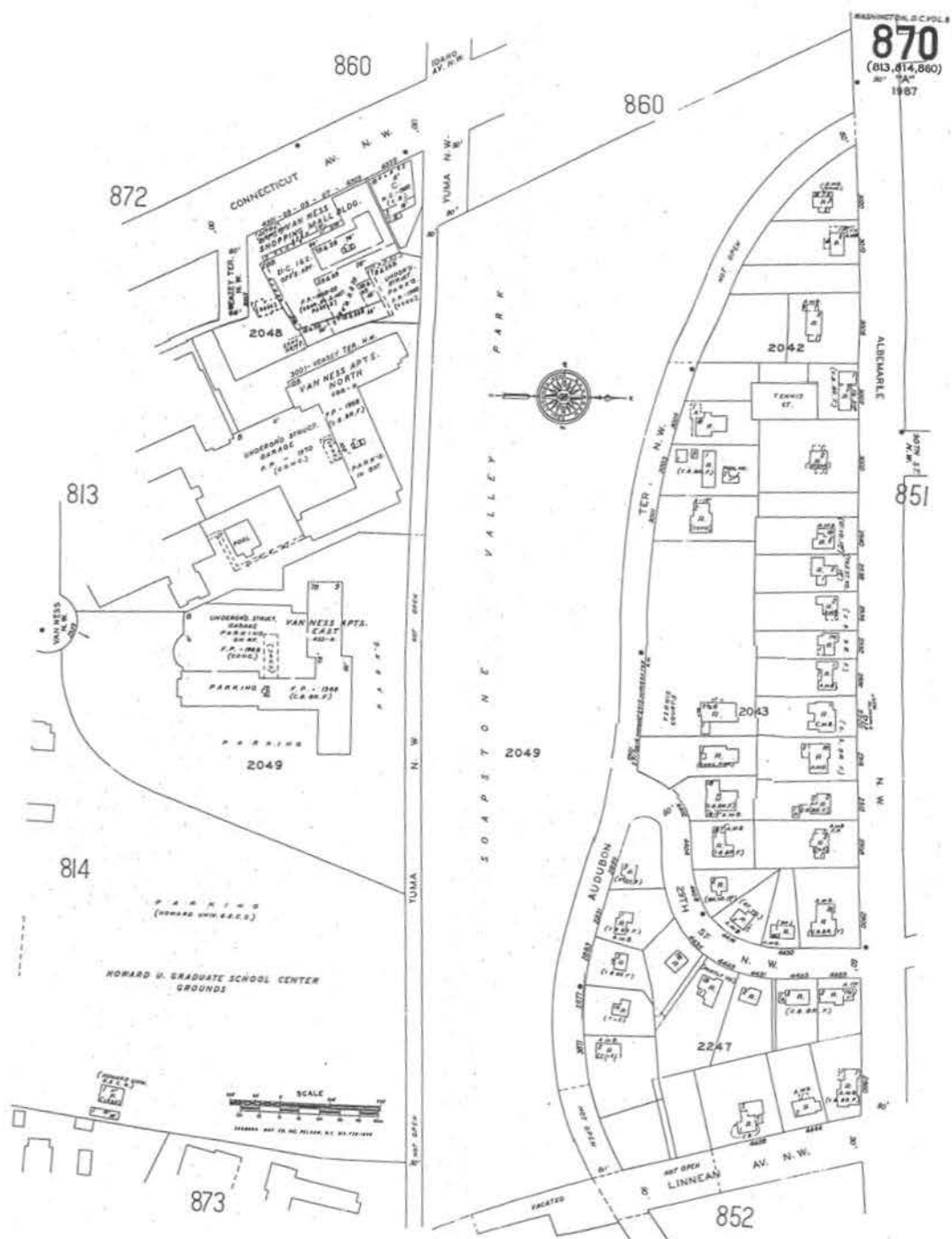
869
(851, 861)
"A"
1987





869B





870A

2051

Connecticut Ave

Vander Meer

805

804

803

802

801

800

799

798

797

796

795

794

793

792

791

790

789

788

787

786

785

784

783

782

781

780

779

778

777

776

775

774

773

772

771

770

769

768

767

766

765

764

763

762

761

760

759

758

757

756

755

754

753

752

751

750

749

748

747

746

745

744

743

742

741

740

739

738

737

736

735

734

733

732

731

730

729

728

727

726

725

724

723

722

721

720

719

718

717

716

715

714

713

712

711

710

709

708

707

706

705

704

703

702

701

700

699

698

697

696

695

694

693

692

691

690

689

688

687

686

685

684

683

682

681

680

679

678

677

676

675

674

673

672

671

670

669

668

667

666

665

664

663

662

661

660

659

658

657

656

655

654

653

652

651

650

649

648

647

646

645

644

643

642

641

640

639

638

637

636

635

634

633

632

631

630

629

628

627

626

625

624

623

622

621

620

619

618

617

616

615

614

613

612

611

610

609

608

607

606

605

604

603

602

601

600

599

598

597

596

595

594

593

592

591

590

589

588

587

586

585

584

583

582

581

580

579

578

577

576

575

574

573

572

571

570

569

568

567

566

565

564

563

562

561

560

559

558

557

556

555

554

553

552

551

550

549

548

547

546

545

544

543

542

541

540

539

538

537

536

535

534

533

532

531

530

529

528

527

526

525

524

523

522

521

520

519

518

517

516

515

514

513

512

511

510

509

508

507

506

505

504

503

502

501

500

499

498

497

496

495

494

493

492

491

490

489

488

487

486

485

484

483

482

481

480

479

478

477

476

475

474

473

472

471

470

469

468

467

466

465

464

463

462

461

460

459

458

457

456

455

454

453

452

451

450

449

448

447

446

445

444

443

442

441

440

439

438

437

436

435

434

433

432

431

430

429

428

427

426

425

424

423

422

421

420

419

418

417

416

415

414

413

412

411

410

409

408

407

406

405

404

403

402

401

400

399

398

397

396

395

394

393

392

391

390

389

388

387

386

385

384

383

382

381

380

379

378

377

376

375

374

373

372

371

370

369

368

367

366

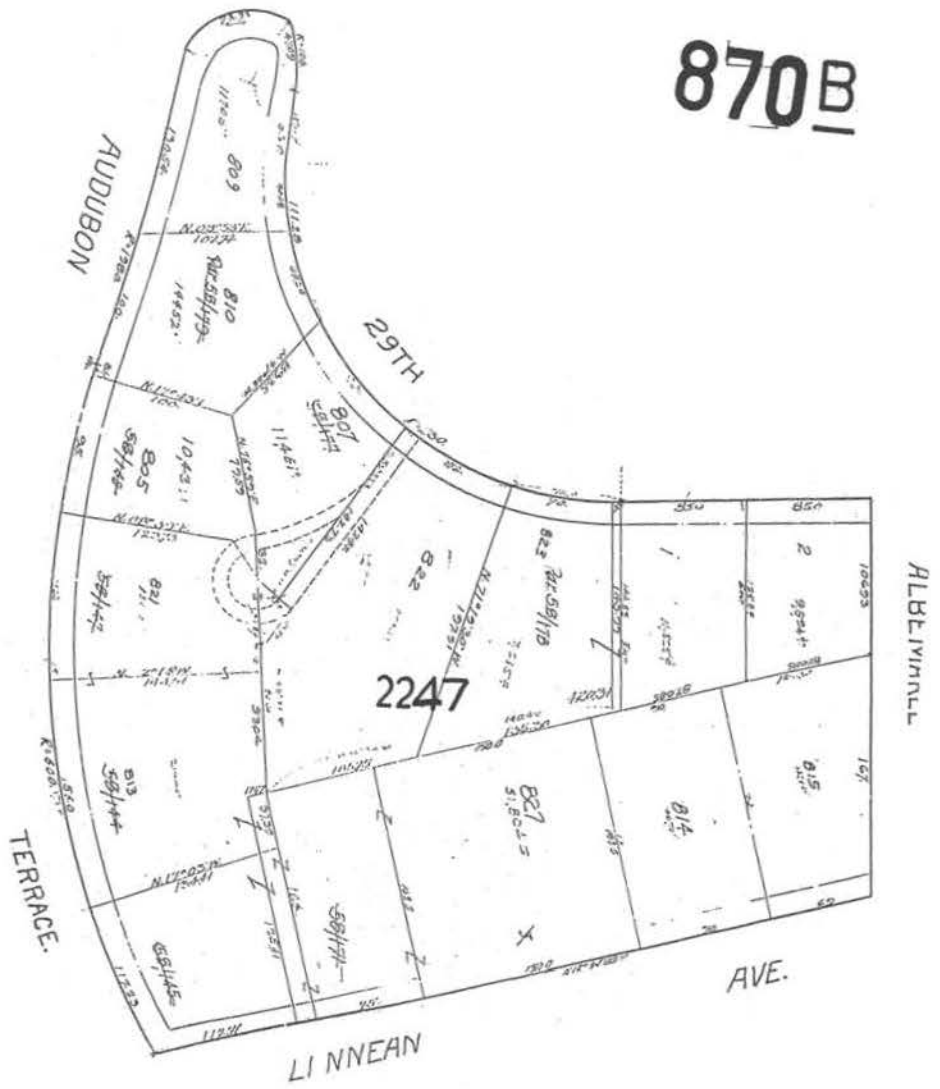
365

364

363</

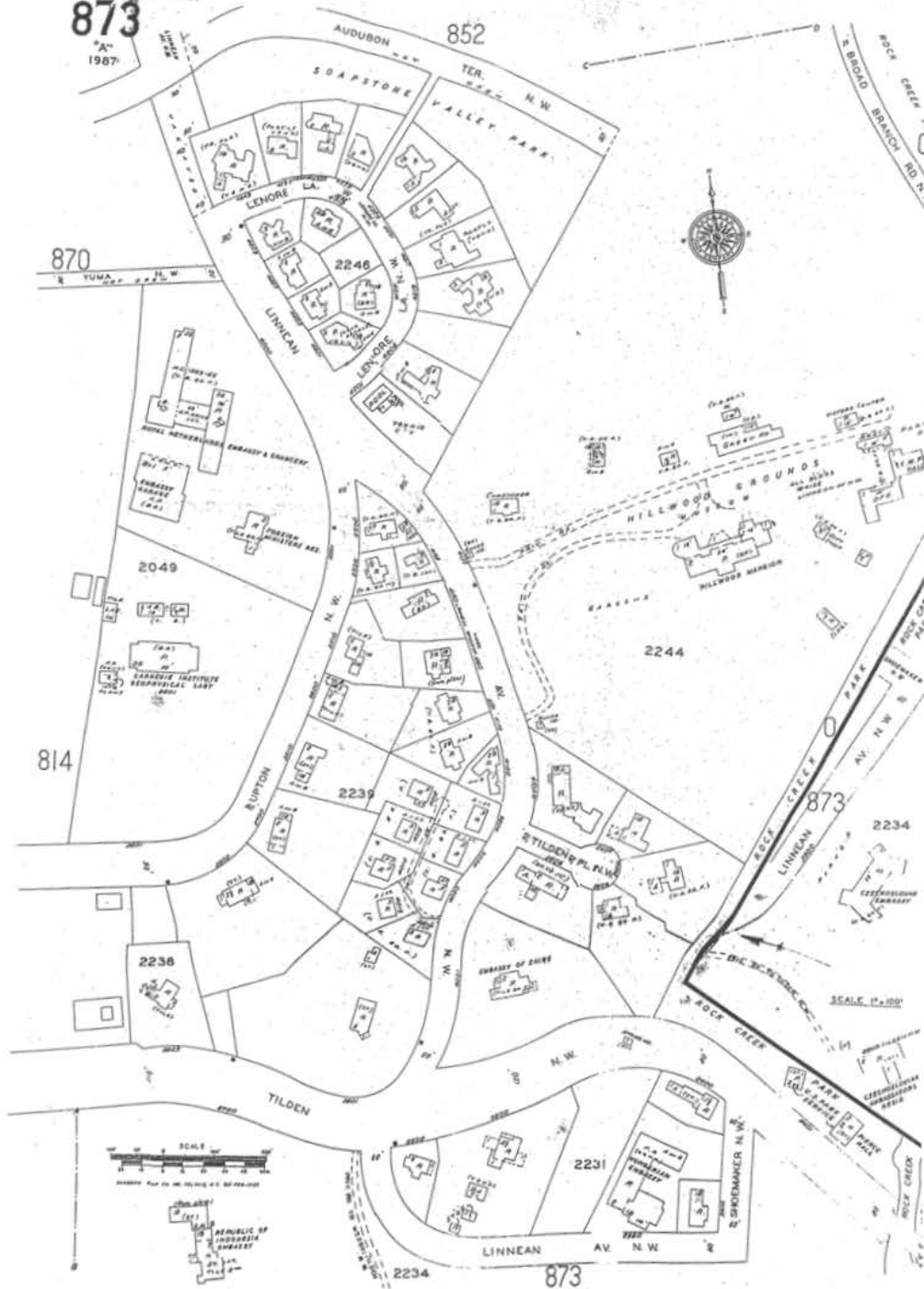
HOWARD UNIVERSITY
2244

870B

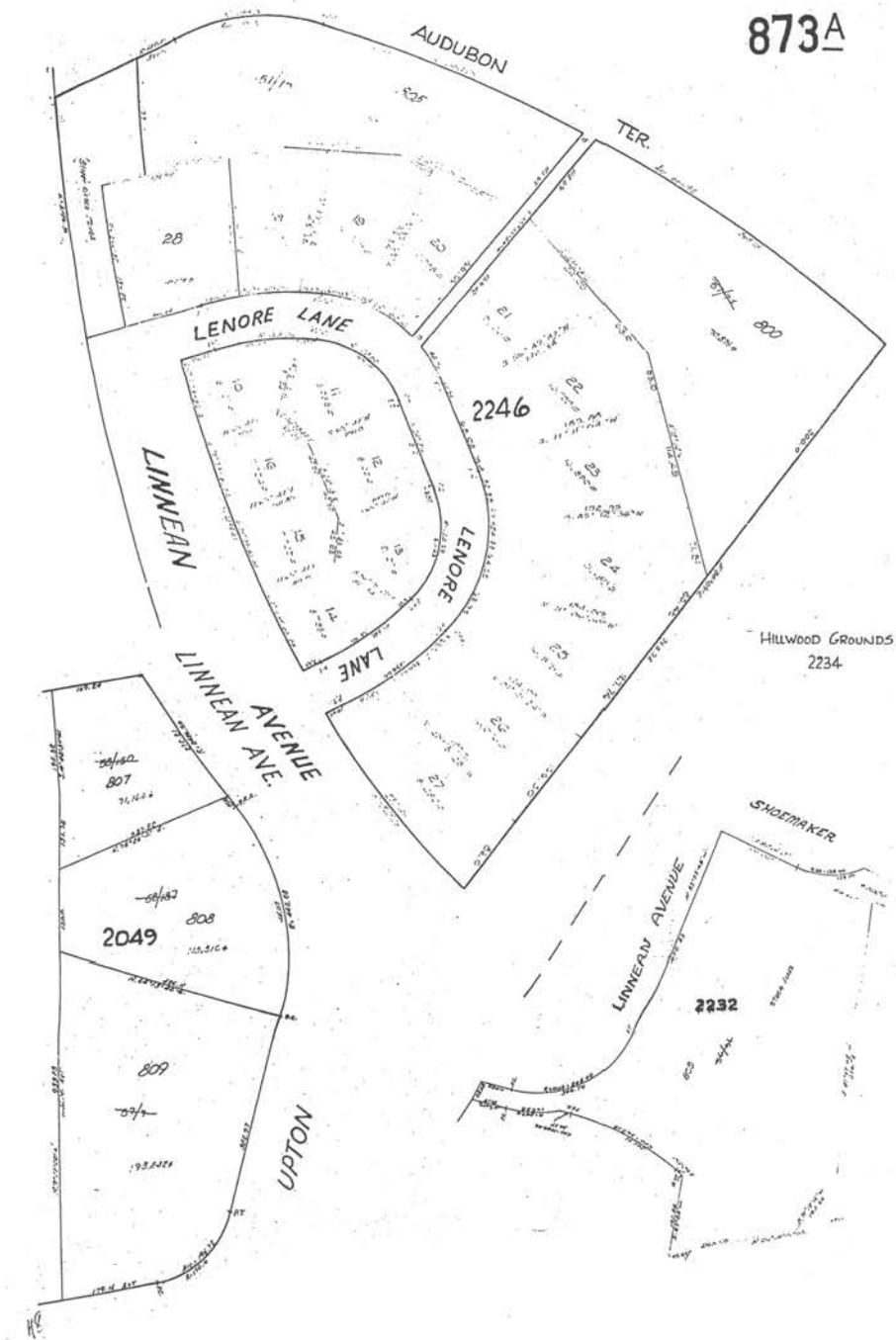


873

"A"
1987



873A



873B

