



January 24, 2020

Meridith Moldenhauer

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Frederick L. Hill, Chairperson
Board of Zoning Adjustment
441 4th Street, NW, Suite 200S
Washington, DC 20010

**RE: BZA Application for 1777 Bond Street Equities LLC and Columbia Road of DC LLC
1767-1777 Columbia Road NW (Square 2580, Lot 522)
Application for Special Exception Relief**

Chairperson Hill and Honorable Members of the Board:

Please accept for filing the enclosed application of 1777 Bond Street Equities LLC and Columbia Road of DC LLC (the "Applicant"). The Applicant requests special exception relief from the parking requirements of Subtitle C § 701.5. The application package includes the following materials:

1. Application Form;
2. Fee Calculator Form;
3. Statement of the Applicant;
4. D.C. Zoning Map;
5. Architectural Plans & Elevations;
6. Authorization Letter(s);
7. Form 135 – Zoning Self-Certification;
8. Statement of Existing and Intended Use;
9. Certification of Proficiency;
10. List of Names and Mailing Addresses of Owners within 200 Feet;
11. List of Names and Mailing Addresses of Persons Having Lease with Owner;
12. Surveyor's Plat;
13. Statement of Community Outreach;
14. Summary of Witness Testimony with Resumes;
15. Photographs of the Property; and
16. Certificate of Service for the Office of Planning and ANC.

We believe that the application is complete and acceptable for filing, and request that the Board schedule a public hearing for the application as soon as possible. If you have any questions,

please do not hesitate to contact me on behalf of the Applicant. Thank you for your attention to this application.

SINCERELY,

COZEN O'CONNOR



Meridith Moldenhauer

Certificate of Service

I hereby certify that on this 24th day of January, 2020, a copy of this Application with attachments was served, via email, as follows:

District of Columbia Office of Planning
1100 4th Street SW, Suite E650
Washington, DC 20024
planning@dc.gov

Advisory Neighborhood Commission 1C
c/o Amir Irani, Chairperson
Japer Bowles, SMD 1C07
1C01@anc.dc.gov
1C07@anc.dc.gov



Meridith Moldenhauer

**BEFORE THE DISTRICT OF COLUMBIA
BOARD OF ZONING ADJUSTMENT**

**APPLICATION OF
1777 BOND STREET EQUITIES LLC and
COLUMBIA ROAD OF DC LLC**

ANC 1C

STATEMENT OF THE APPLICANT

I. NATURE OF RELIEF SOUGHT

This statement is submitted on behalf of the Applicant, 1777 Bond Street Equities LLC and Columbia Road of DC LLC (collectively, the “Applicant”), the owners of the property located at 1767 – 1777 Columbia Road NW (Square 2580, Lot 522) (the “Property”), in support of its application for special exception relief, pursuant to Subtitle X § 901.2, from the requirements for vehicular parking under Subtitle C § 701.5 in connection with an addition to an existing mixed-use building.

II. JURISDICTION OF THE BOARD

The Board of Zoning Adjustment (the “Board”) has jurisdiction to grant the special exception relief requested herein pursuant to Subtitle X § 901.2 of the Zoning Regulations.

III. BACKGROUND

A. The Property and the Surrounding Neighborhood

The Property is in the MU-5A Zone District with a lot area of 23,762 sq. ft.¹ A copy of the zoning map is attached at **Tab A**. The Property is improved with a mixed-use building that includes ground level retail, five levels of residential dwelling units, and 31 parking spaces (the “Existing Building”). As described in more detail below, the Applicant seeks to construct an

¹ The Property is comprised of tax lots 860, 861, 862, 863, 864, 7000 and 7001. The tax lots were subdivided into one record lot – Lot 522 in Square 2580.

addition to the east of the Existing Building comprising 40 dwelling units and ground level retail space.

The Property is located near the bustling intersection of Columbia Road NW and 18th Street NW in the Adams Morgan neighborhood. The Property is rectangular in shape and is mid-block with frontage on Columbia Road NW. To the rear of the Property is an alley that varies in width from 10 feet at its entrance along Adams Mill Road to 15.5 feet behind the Property. A copy of the Baist Map is attached at **Tab B**. Directly to the east of the Property is a five-story residential building. To the west is a two-story commercial space that is owned by PNC Bank. The Property is not located in an historic district.

The surrounding Adams Morgan neighborhood features an eclectic mix of uses from commercial, hotel, and eating and drinking to different types of residential space, including medium-density apartments and rowhomes. Columbia Road is primarily large apartment buildings and commercial space, both to the east toward 16th Street NW and to the west toward Connecticut Avenue NW. Across Columbia Road NW from the Property is “The Line” hotel. To the south of the Property down 18th Street is a highly-trafficked row of bars and restaurants.

B. Traffic Conditions and Mass Transit

The Property has excellent access to public transportation. There are several bus stops within one to two blocks of the Property, including lines 90, 96, 42, 43, H1, L2 and X3. Bus lines 90 and X3 are “priority corridor network” routes that would otherwise entitle the Property to a 50% reduction in its parking requirement. However, the Property is subject to the District’s residential parking permit program and, therefore, the parking reduction may not be applied. *See* Subtitle C § 702.1(c)(4-5).

The Woodley Park-Zoo/Adams Morgan Metrorail Station and the Columbia Heights Metrorail Station are just over ½ mile from the Property. There are two Capital Bikeshare stations within a block of the Property, with a third station approximately three blocks away on 18th Street NW. In general, the area is very pedestrian-friendly, as Walkscore.com rates the Property as a “walker’s paradise.”

C. The Project

The Applicant proposes an addition to the Existing Building that will include a maximum of 40 new residential units and ground level retail (the “Addition”). A copy of the Architectural Plans are attached at **Tab C**. As background, the Existing Building was constructed in 2017-2018 as a by-right structure pursuant to Building Permit B1604093. The Existing Building, which is called the “AdMō Heights,” has approximately 7,430 sq. ft. of ground level retail, 80 dwelling units on floors two through six, and a below-grade parking level with 31 spaces.² Over 8% of the Existing Building’s residential gross floor area, or approximately 3,743 sq. ft., is set aside for Inclusionary Zoning units.

The Addition will extend the Existing Building to the eastern portion of the Property that is currently improved with three, single-story structures. The Addition’s ground level will utilize the footprint of the existing structures for approximately 7,275 sq. ft. of retail space. The Addition will have a maximum of 40 units located on floors two through six, but the residential portion will only occupy the front half of the Property. The back half of the eastern portion of the Property will remain open above the ground level retail, with a new green roof added over the first story. To the rear of the retail space will be three parking spaces, a loading berth and a service/delivery space abutting the alley. As part of the Addition, the Applicant also proposes communal penthouse

² Three of the 31 parking spaces in the Existing Building will be removed and will be replaced with three parking spaces at the rear of the Addition.

space with a club room, gym, and lounge area. The Addition will add long-term bicycle storage and a general storage room on the below-grade garage level.

The Addition and the Existing Building (collectively, the “Project”) will meet all the development standards in the MU-5A zone with the exception of parking, as described below. The Project will have a total floor-area-ratio of 4.18, or approximately 98,121 sq. ft. of gross floor area. The Project will have a maximum building height of 70 feet, plus the penthouse. The residential portion of the Project on floors two through six has a lot occupancy of 70%, with the ground level retail space extending up to 91% lot occupancy.³

IV. NATURE OF SPECIAL EXCEPTION RELIEF SOUGHT AND STANDARD OF REVIEW

The Applicant requests special exception relief from the requirements for vehicular parking because the Project will have a total of 31 parking spaces, including in the Existing Building. Under the Zoning Regulations, the Project must provide a minimum of 55 parking spaces; 39 spaces for the residential units and 16 spaces for the retail use.⁴

Pursuant to D.C. Code § 6-641.07(g)(2) and 11 DCMR X § 901.2, the Board is authorized to grant a special exception where it finds the special exception:

- (1) Will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps;
- (2) Will not tend to affect adversely, the use of neighboring property in accordance with the Zoning Regulations and Zoning Maps; and
- (3) Subject in specific cases to special conditions specified in the Zoning Regulations. 11 DCMR Subtitle X § 901.2.

³ In the MU-5A zone, residential uses are limited to a maximum lot occupancy of 80%. However, there is no lot occupancy limitation for non-residential uses.

⁴ Under Subtitle C § 701.5, multiple dwelling units must provide 1 space per 3 dwelling units in excess of 4 units. Thus, 120 units requires 39 parking spaces. Retail space requires 1.33 spaces per 1,000 sq. ft. in excess of 3,000 sq. ft. 14,705 sq. ft. of retail results in a parking requirement of 16 spaces for 14,705 sq. ft.

Relief granted through a special exception is presumed appropriate, reasonable, and compatible with other uses in the same zoning classification, provided the specific requirements for the relief are met. In reviewing an application for special exception relief, “[t]he Board’s discretion . . . is limited to a determination of whether the exception sought meets the requirements of the regulation.” *First Baptist Church of Wash. v. District of Columbia Bd. of Zoning Adjustment*, 432 A.2d 695, 701 (D.C. 1981) (quoting *Stewart v. District of Columbia Bd. of Zoning Adjustment*, 305 A.2d 516, 518 (D.C. 1973)). If the applicant meets its burden, the Board must ordinarily grant the application. *Id.*

V. APPLICANT MEETS BURDEN FOR SPECIAL EXCEPTION RELIEF

A. The Relief is Harmonious with the General Purpose and Intent of the Zoning Regulations and Maps

The special exception relief will be in harmony with the purpose and intent of the Zoning Regulations and related maps. The MU-5A zone is intended for “compact mixed-use development” that is “located on arterial streets, in uptown and regional centers, and at rapid transit stops.” *See* Subtitle C § 400.4(a), (c). The MU-5A likewise encourages “facilities for shopping and business needs . . . for large segments of the District of Columbia outside of the central core.” *See* Subtitle C § 400.4(b).

The Project will further these goals by providing a mix of retail and residential space along a vibrant corridor in the Adams Morgan neighborhood. The urban nature of the mixed-use neighborhood is intended to encourage walking and the use of public transportation to access amenities, obviating the need for personal vehicles. To that end, there are residential-serving amenities along the same block as the Property, including a CVS Pharmacy and a Safeway grocery store. Numerous dining and retail options can be accessed on-foot within two to three blocks of

the Property. Accordingly, the parking relief is harmonious with the purpose and intent of the Zoning Regulations.

B. The Relief will not tend to Adversely Affect the Use of Neighboring Property

The Property's location in a transit-rich, mixed-use neighborhood is expected to attract residents and customers that live and walk to the Project, and, as such, will not require parking spaces. As noted above, the Property is easily accessible through a variety of transit options. The Property is just over ½ mile from two Metrorail Stations. Despite being just outside a ½ mile radius,⁵ the Property is still within a six-block walk to the Metrorail. There are numerous bus stops within one to two blocks of the Property that provide access to priority buslines.

In addition to the three parking spaces to the rear of the Addition, the Existing Building will have 28 parking spaces that can be used by residents. Notably, the Existing Building has been open for over a year and parking is not close to being fully utilized. The excess parking availability in the Existing Building will further limit any impact of the Project's special exception relief.

C. The Project Satisfies the Special Conditions of Subtitle C § 703

In addition to the general special exception standard, the Project satisfies the special conditions for parking relief pursuant to Subtitle C § 703, as follows:

- i. The Applicant meets several of the conditions for parking relief under Subtitle C § 703.2.

(a) The use or structure is particularly well served by mass transit, shared vehicle, or bicycle facilities

The Property is well-served by public transportation options, including mass transit, shared vehicles and bicycle facilities. As outlined above, the Property is in close proximity to two

⁵ The Property is approximately 250 feet short of being located within ½ mile of the Woodley Park Metrorail Station. Similarly, the Property is approximately 400 feet short of being located within ½ mile of the Columbia Heights Metrorail Station. If the Property were within ½ mile of either Metrorail station, it would be entitled to a 50% reduction in its parking requirement and relief would not be needed.

Metrorail Stations, seven bus lines, and three Capital Bikeshare stations. Additionally, there are two Zipcar parking spaces within a block of the Property, and three more Zipcar spaces within a ¼ of a mile of the Property.

(b) Land use or transportation characteristics of the neighborhood minimize the need for required parking spaces

The land use and transportation characteristics of the Adams Morgan neighborhood greatly minimize the need for parking at the Project. Adams Morgan is a mixed-use neighborhood that offers a variety of amenities within walking distance of the Property, including grocery stores, commercial and retail space, restaurants and bars. Further, Adams Morgan is in close proximity to the city's business district, with a concentration of office buildings located in neighborhoods such as Dupont Circle, Foggy Bottom and Downtown. The resident-serving amenities and office locations can be accessed on-foot, obviating the need for residents to have personal vehicles. The central location of Adams Morgan coupled with excellent access to public transportation also allows for convenient access throughout the District.

The limited need for parking at the Property is demonstrated by the vacancies in the Existing Building's parking garage. Approximately half of the parking spaces in the garage are not leased by residents. The Existing Building has been operating for over a year, but the parking garage is not close to being fully utilized. Given the limited use of existing parking spaces, it would be inefficient to provide additional parking spaces at the Project.

- ii. The reduction in parking is for the amount Applicant is physically unable to provide and is proportionate to the reduction in parking demand.

The Applicant is providing three parking spaces at the rear of the Addition. The parking spaces are located next to a required loading berth and service/delivery space. The Applicant cannot physically provide additional parking for the Addition.

iii. The Applicant Will Contact DDOT to Discuss a Transportation Demand Management Plan

As required by Subtitle C § 703.4, the Applicant will contact the District Department of Transportation to discuss the parameters of a transportation demand management plan for the Property.

VI. COMMUNITY OUTREACH

The Applicant attended meetings of Advisory Neighborhood Commission (ANC) 1C in December 2019 and January 2020 to informally introduce the proposal and the anticipated application. On January 22, 2020, the Applicant also presented to ANC 1C's Planning, Zoning and Transportation Subcommittee. In accordance with ANC 1C's procedures and guidelines, the Applicant will continue working with ANC 1C after the application is filed. The Applicant will formally present the application to ANC 1C at its next available public meeting.

VI. CONCLUSION

For the reasons stated above, the Project meets the applicable standards for special exception relief under the Zoning Regulations. Accordingly, the Applicant respectfully requests the Board grant the application.

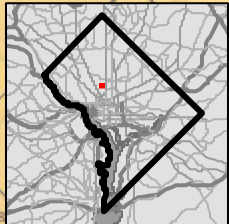
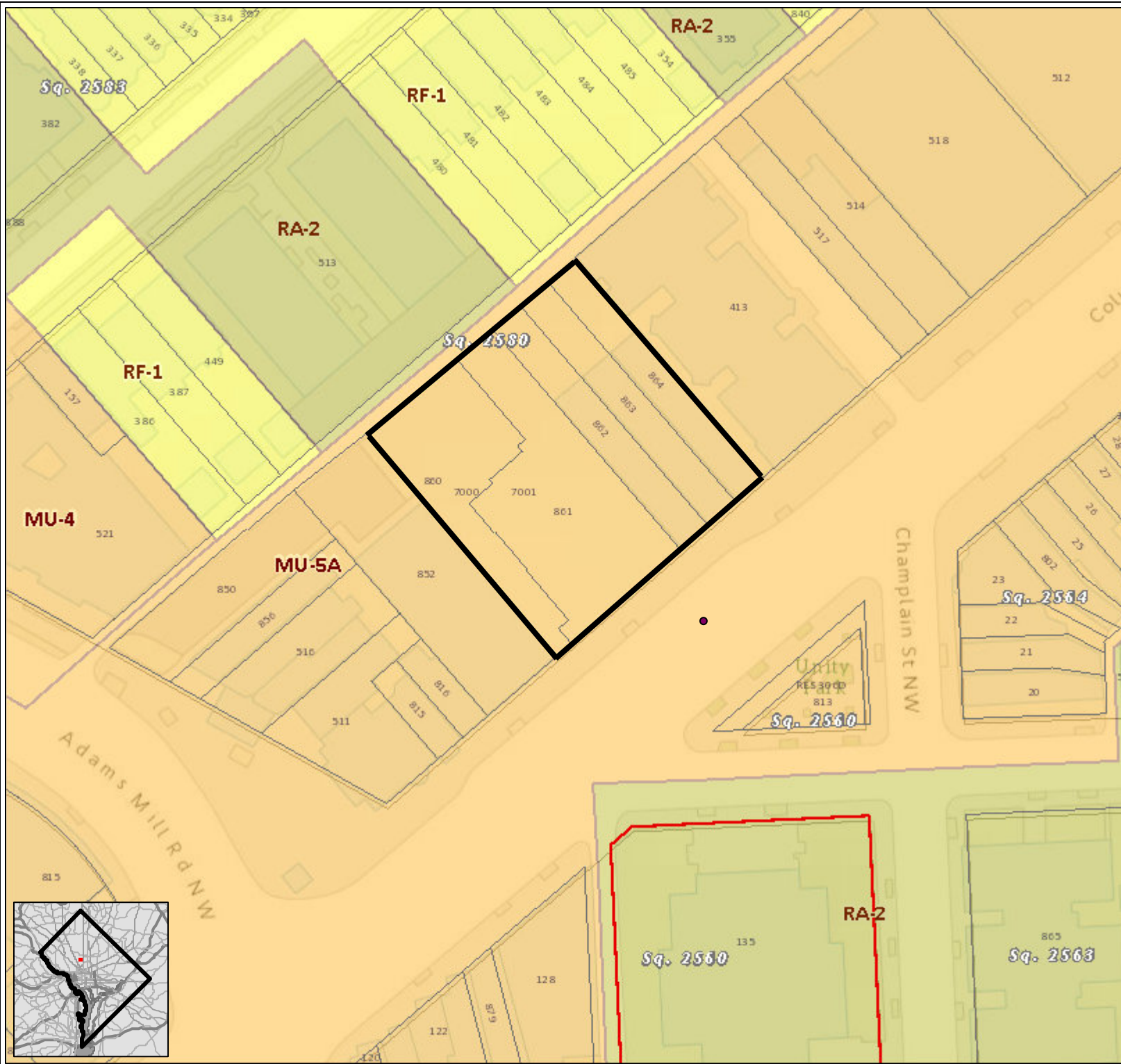
Respectfully Submitted,

COZEN O'CONNOR

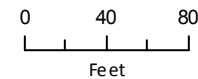


Meridith H. Moldenhauer
Eric J. DeBear
1200 19th Street NW
Washington, DC 20036

Tab A



Zoning Map of the District of Columbia



Extracted from Online Zoning Information published by the District of Columbia Office of Zoning, DCGIS, and Office of the Chief Technology Officer (OCTO)
 Exported on: 1/24/2020

To certify zoning on any property in order to satisfy a legal requirement, contact the office of Zoning at the address listed below.

District of Columbia Office of Zoning,
 441 4th St NW, Suite 200 South, Washington, DC 20001
 202-727-6311 | dcoz@d.c.gov

Tab B

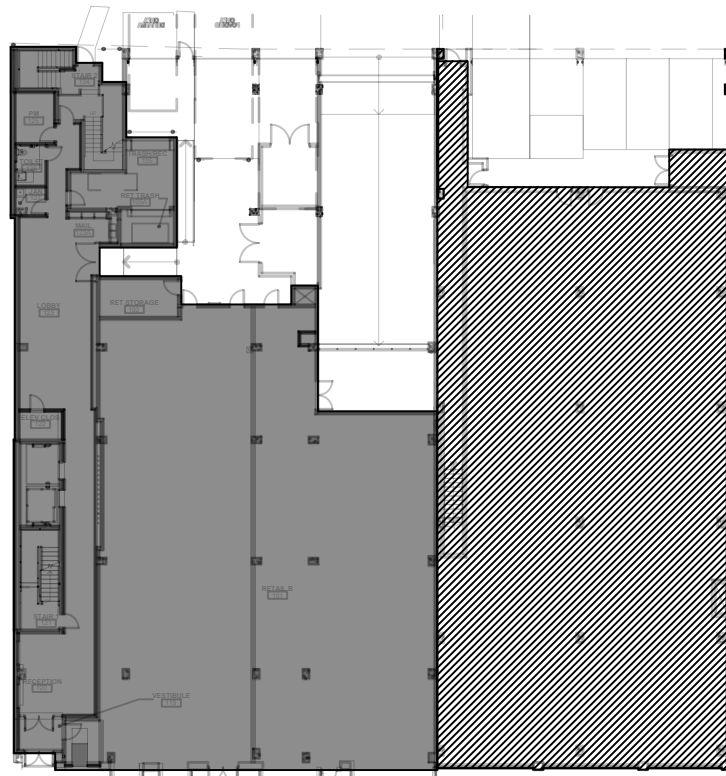
Tab C



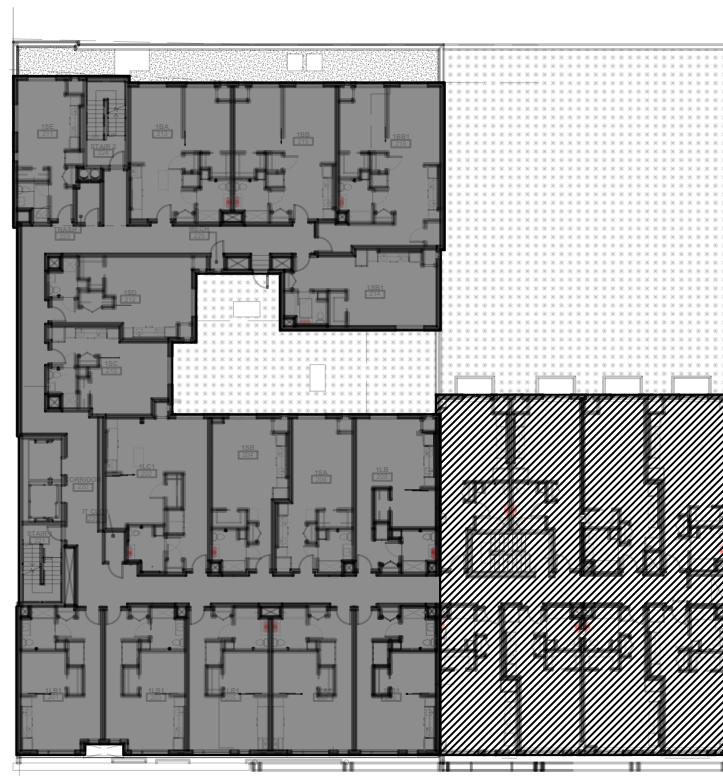
DRAWING INDEX	
COVER SHEETS	
CS 1.0	COVER SHEETS
CS 2.0	ZONING ANALYSIS
CS 3.0	GROSS FLOOR AREA
ARCHITECTURAL	
A 0.0	ARCHITECTURAL SITE PLAN
A 1.1	PARKING LEVEL (LOWER LEVEL)
A 1.2	GROUND LEVEL
A 1.3	SECOND LEVEL
A 1.4	TYPICAL LEVEL (LEVELS 3-6)
A 1.5	ROOF PLAN
A 2.1	SOUTH ELEVATION
A 2.2	NORTH ELEVATION
A 2.3	EAST ELEVATION
A 3.1	BUILDING SECTION - A
A 3.2	BUILDING SECTION - B

PROJECT DATA						
PROJECT ADDRESS:		1777 COLUMBIA ROAD NORTHWEST, WASHINGTON, D.C., 20009				
SQUARE LOT:		2580 7000/862/863/864				
ZONING DISTRICT		MU-5A				
LOT AREA:		23,762 SF				
CONSTRUCTION TYPE:		IIB (Levels 3-PH) over 1A (Levels 1&2)				
NUMBER OF STORIES:		6 STORIES ABOVE GRADE (PLUS PENTHOUSE)				
FIRE SUPPRESSION SYSTEM:						
ZONING ANALYSIS - DCMR TITLE 11 (2016)						
SECTION	ZONING REGULATION	REQUIRED/PERMITTED MU-5A	PROPOSED MU-5A	COMPLIES	NOTES	
Floor Area Ratio						
TABLE G-402.1	Maximum Permitted FAR w/ IZ	4.2	99,800 GSF	4.13	+/- 98,121 GFA	YES Existing structure contains 67,538 GSF Existing Residential = 57,468 GSF Existing Retail = 7,430 GSF Proposed Residential = 23,308 GSF
	Maximum Allowable Non-Residential FAR	1.5	35,643 GFA	0.6	14,705 GFA	
Inclusionary Zoning						
C-1003.2	Set-Aside Requirements	Greater of 8% residential GFA or 50% of bonus density, plus 8% penthouse habitable space.	8% residential = 6,462 GSF. 3,743 NSF in Existing = 2,719 NSF remaining. 80% efficiency = 2,175 NSF Total Remaining.	YES	Existing structure contains 3,743 NSF of IZ units @ 8% Residential GFA (3,729 were required)	
C-1005.1	Development Standards Regarding Inclusionary Units	The proportion of studio and one-bedroom inclusionary units shall not exceed the proportion of the comparable market rate units for each unit type.	Studio/1 BR MR: 40 Units (100%) 1 BR IZ: 1 Unit (10%)	YES		
Building Height						
TABLE G-403.1	Height	70' - 0"	70' - 0"	YES	BHMP - Top of Curb to top of parapet.	
Penthouse						
TABLE G-403.3	Height	12'-0", except 18'-6" for penthouse mechanical space	12' - 0" penthouse, 18'-6" elevator overrun	YES		
	Stories	1 story, (2nd story permitted for penthouse mechanical space)	1 story, plus 2nd story for elevator overrun	YES		
C-1502.1(a)(b)(d)	Setbacks	1:1 on Front, Back 1:2 on Side	1:1 on Front, Back 1:2 on Side	YES	12' high penthouse - 12' set back front and back - 6' set back on side.	
C-1503.1(c)	Permitted FAR	0.4 (9,505 sf)	.11 (2,655 SF)	YES		
C-1503.2	Permitted Area	Not exceeding 1/3 total roof area (.11 (2,655 SF)	YES		
Lot Occupancy						
TABLE G-404.1	Residential w/ IZ	80%	70%	YES		
	Non Residential	100%	91%	YES		
Rear Yard Setback						
G-405.2	Rear Yard Setback	Min. 15'-0"	15' - 0"	YES		
G-405.4		A horizontal plane may be established at 25' above the mean finished grade at the middle of the rear of the structure for the purpose of measuring rear yards.	Second level and up is set back at min. 15' from property line.	YES		
G-405.5		For portion of structure below horizontal plane described in 405.4 from the center line of the alley to the rear wall of the portion, and for the portion of the structure above the horizontal plane described in 405.4, from the rear lot line to the rear wa	Ground level is set back 15' from center of ally line.	YES		

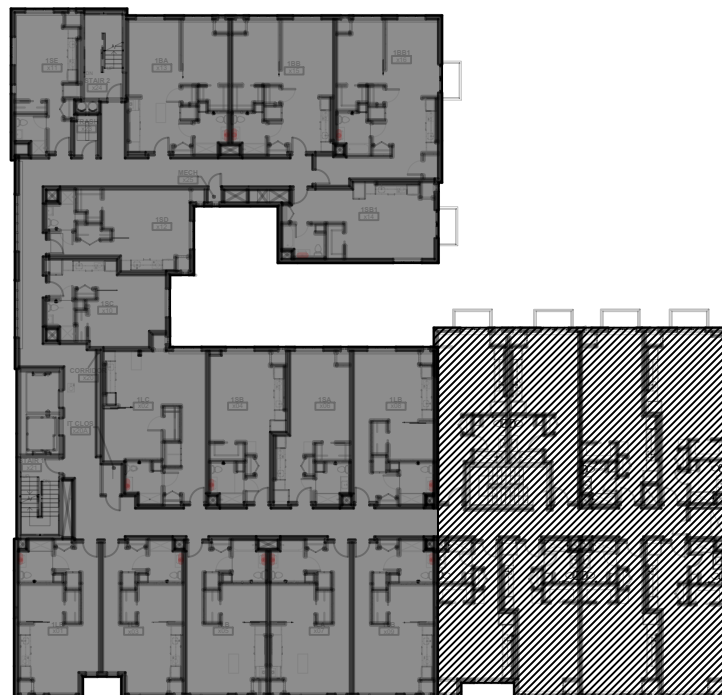
Side Yard Setback						
G-406.1	Side Yard Setback	Not Required	None Provided	N/A		
Closed Court (Existing Building)						
G-202.1	Min Width	4 in/ft of height of court (15' Min.)	15'	YES		
	Min Area	2x the square of the required width (350 SF min.)	1,160 SF	YES		
Open Court (Addition Building)						
G-202.1	Min Width	4 in/ft of height of court (10' Min.)	60' x 72'-2"	YES		
	Min Area	Not Required	None Provided	N/A		
Green Area Ratio						
G-407.1	Ratio	0.3	0.52	YES	12,725 SF Green Roof (Total) 8,282 SF Green Roof (Phase 1) 4,443 SF Green Roof (Phase 2)	
Car Parking						
TABLE C-701.5	Retail	1.33 / every 1,000 SF over 3000 = 16 Spaces	6 (existing)	TBD	31 Total Existing Spaces in Phase 1. 14,705 SF Retail (7,430 Phase 1 & 7,275 Phase 2)	
TABLE C-701.5	Residential	1 per 3 dwelling units in excess of 4 units = 39 Spaces	25 (existing)	TBD	31 Total Existing Spaces in Phase 1. 120 Residential Units (80 Phase 1 & 40 Phase 2) 80,776 SF Retail (57,468 SF Phase 1 & 23,308 Phase 2)	
	Total	55 parking spaces	31 Spaces (28 Spaces in existing garage with an additional 3 re-located spaces)	TBD	Submitting design to BZA for parking reduction.	
Bicycle Parking						
		Long Term	Short Term	Long Term	Short Term	
TABLE C-802.1	Retail	1 per 10,000 SF in excess of 3,000 SF = 1 Spaces	1 Space /3,500 SF = 4 Spaces	2	6	YES 14,705 SF Retail (7,430 Phase 1 & 7,275 Phase 2)
TABLE C-802.1	Residential	1 Space /3 units = 40 Spaces	1 Space /20 units = 6 Spaces	48	6	YES 120 Residential Units (80 Phase 1 & 40 Phase 2)
	Total	41 Spaces	10 Spaces	50 Spaces	12 Spaces	YES
Loading Requirements						
TABLE C-901.1	Residential	More than 50 Dwelling Units, One Loading Berth Req. More than 50 Dwelling Units, One Service Space Req.	One Loading for residential provided & Delivery Space Provided.	YES	120 Units > 50 Units	
TABLE C-901.1	Retail	Retail SF between 5,000 SF and 20,000 SF Req. one loading berth.	One Loading for retail has been provided.	YES	14,705 SF Retail (7,430 Phase 1 & 7,275 Phase 2) 5,000 SF < 14,705 SF < 20,000 SF	
C-905.2	Loading Berth Size	2 Required	2 Provided	YES	12' Wide x 30' (min.) Deep x 14' High Space loading platform provided - 2nd berth provided since internal access is not available between existing and new construction.	
C-905.4(a)	Loading Platform	2 Required	2 Provided	YES	8' wide and min. 100 sf loading platform provided adjacent to service space	
C-905.3	Delivery / Service Space	1 Required	1 Provided	YES	10' Wide x 20' Deep x 14' High Space.	



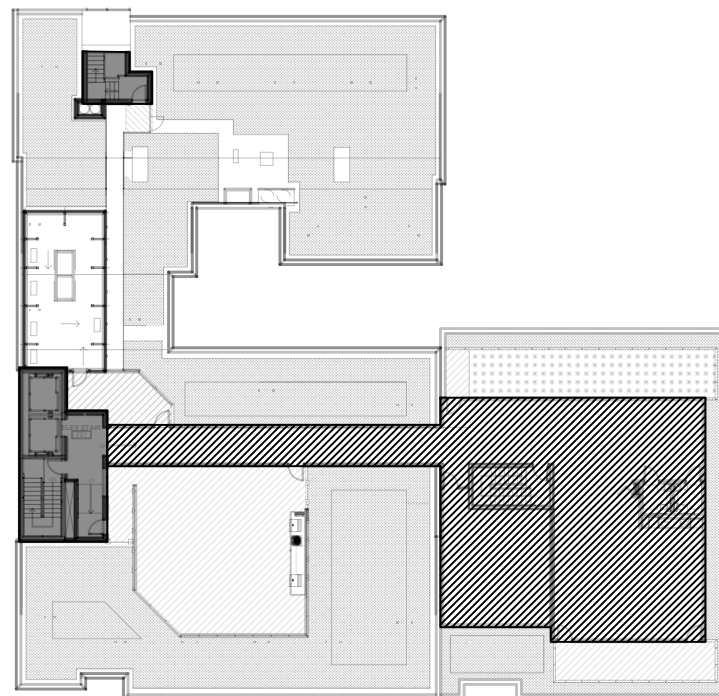
1 GROUND FLOOR PLAN
NTS



2 SECOND FLOOR PLAN
NTS



3 TYPICAL FLOOR PLAN
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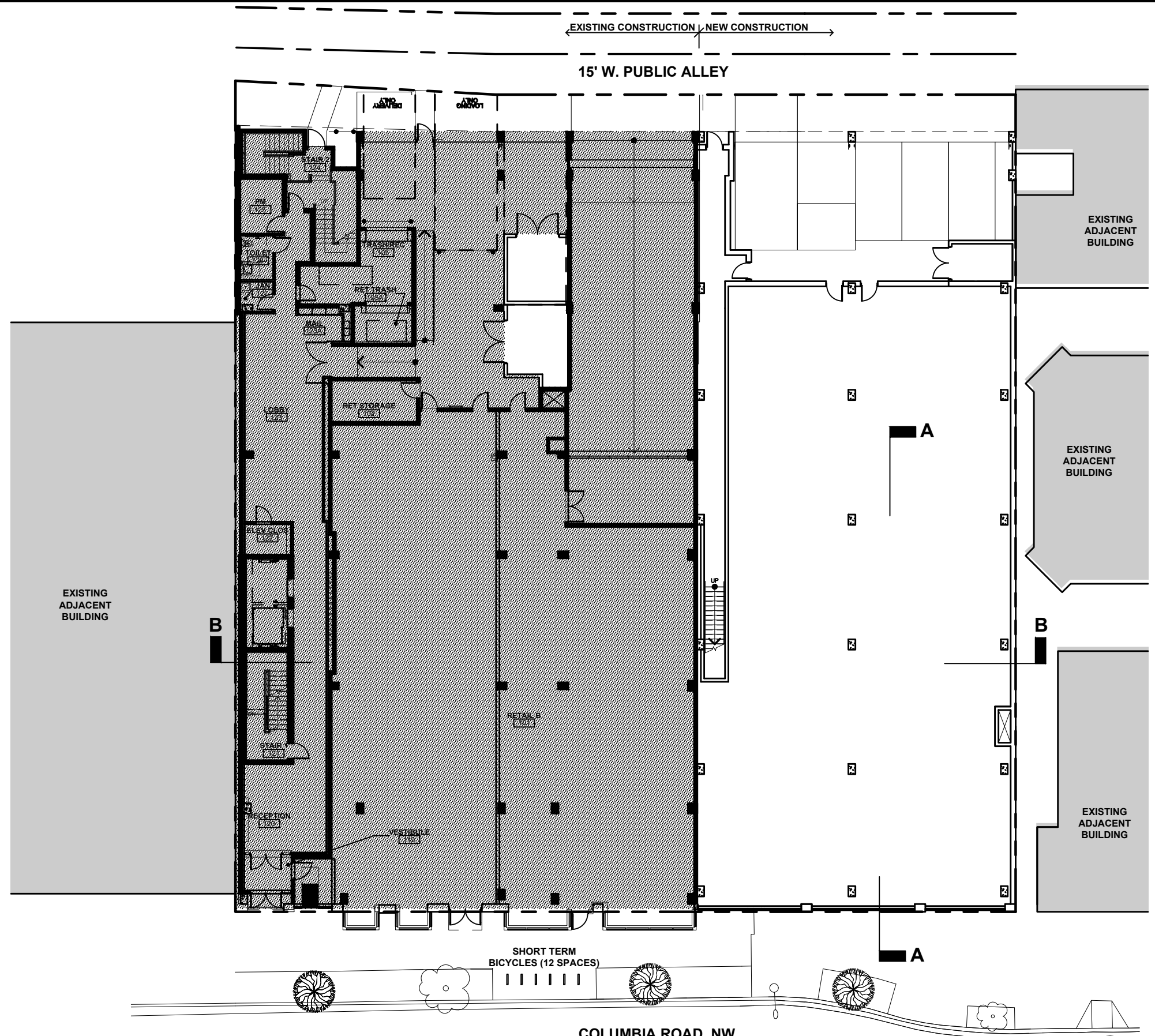


4 PENTHOUSE PLAN
NTS

GROSS FLOOR AREA								
LEVEL	EXISTING			PROPOSED			TOTAL GSF	TOTAL UNITS
	RESIDENTIAL	UNIT	NON - RESIDENTIAL	RESIDENTIAL	UNIT	NON - RESIDENTIAL		
PARKING	570 GSF	0	13,255 GSF	0	0	1,587 GSF	15,412 GSF	0
GROUND	2,155 GSF	0	7,430 GSF	622 GSF	0	7,275 GSF	17,300 GSF	0
SECOND	11,347 GSF	16 UNITS	0	4,532 GSF	8 UNITS	0	15,879 GSF	24 UNITS
THIRD	11,538 GSF	16 UNITS	0	4,694 GSF	8 UNITS	0	16,232 GSF	24 UNITS
FOURTH	11,538 GSF	16 UNITS	0	4,694 GSF	8 UNITS	0	16,232 GSF	24 UNITS
FIFTH	11,538 GSF	16 UNITS	0	4,694 GSF	8 UNITS	0	16,232 GSF	24 UNITS
SIXTH	11,507 GSF	16 UNITS	0	4,694 GSF	8 UNITS	0	16,201 GSF	24 UNITS
PENTHOUSE	485 GSF	0	0	166 GSF	0	2,490 GSF	3,141 GSF	0
TOTAL	60,678 GSF	80 UNITS	20,685 GSF	24,096 GSF	40 UNITS	11,352 GSF	116,811 GSF	120 UNITS

LEGEND:

- EXISTING CONSTRUCTION
- NEW CONSTRUCTION



LEGEND:

- EXISTING CONSTRUCTION
- NEW CONSTRUCTION

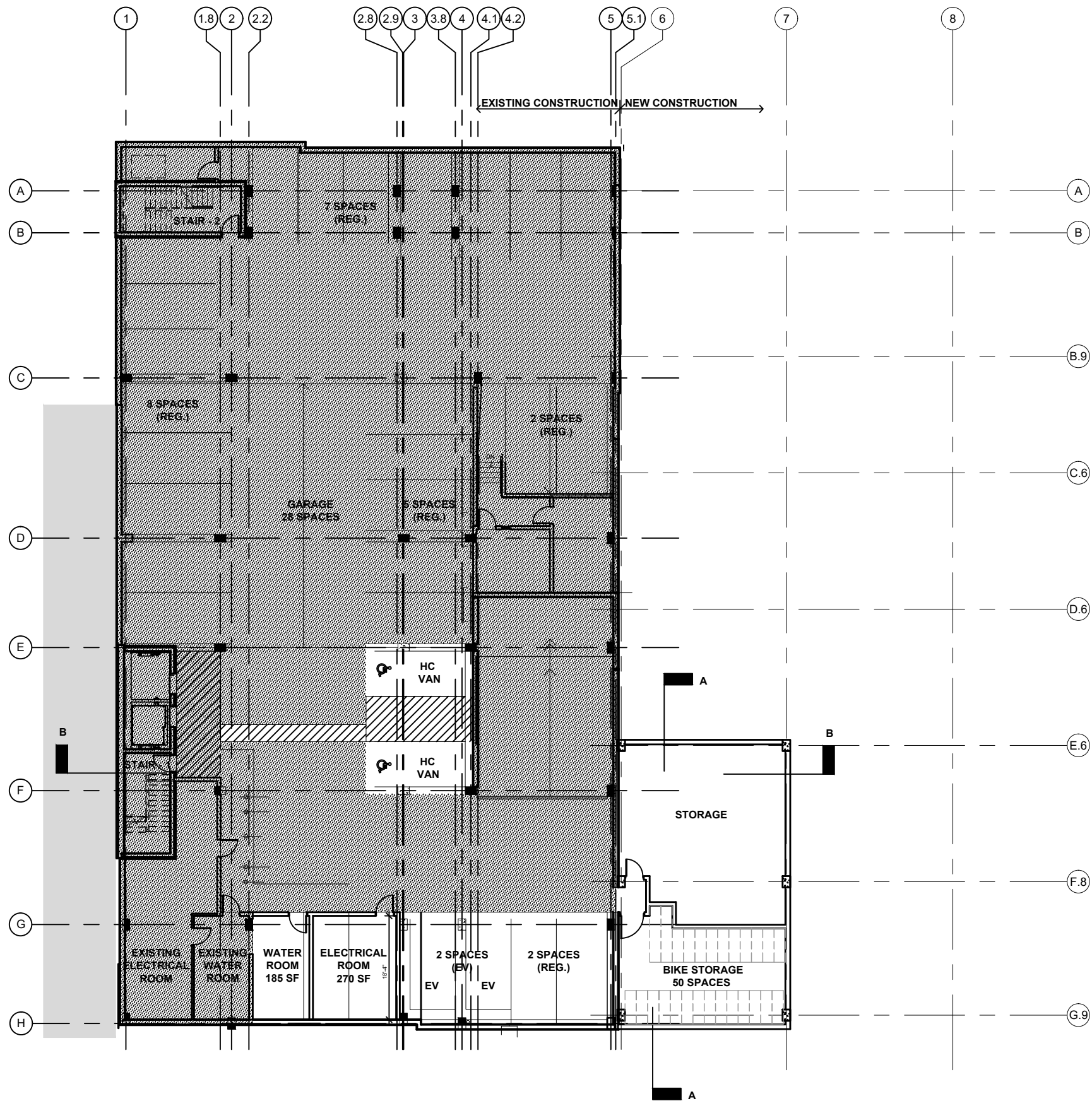
BEZTAK & FOXHALL PARTNERS

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ARCHITECTURAL SITE PLAN 3/64" = 1' - 0"
 BOARD OF ZONING ADJUSTMENT SUBMISSION

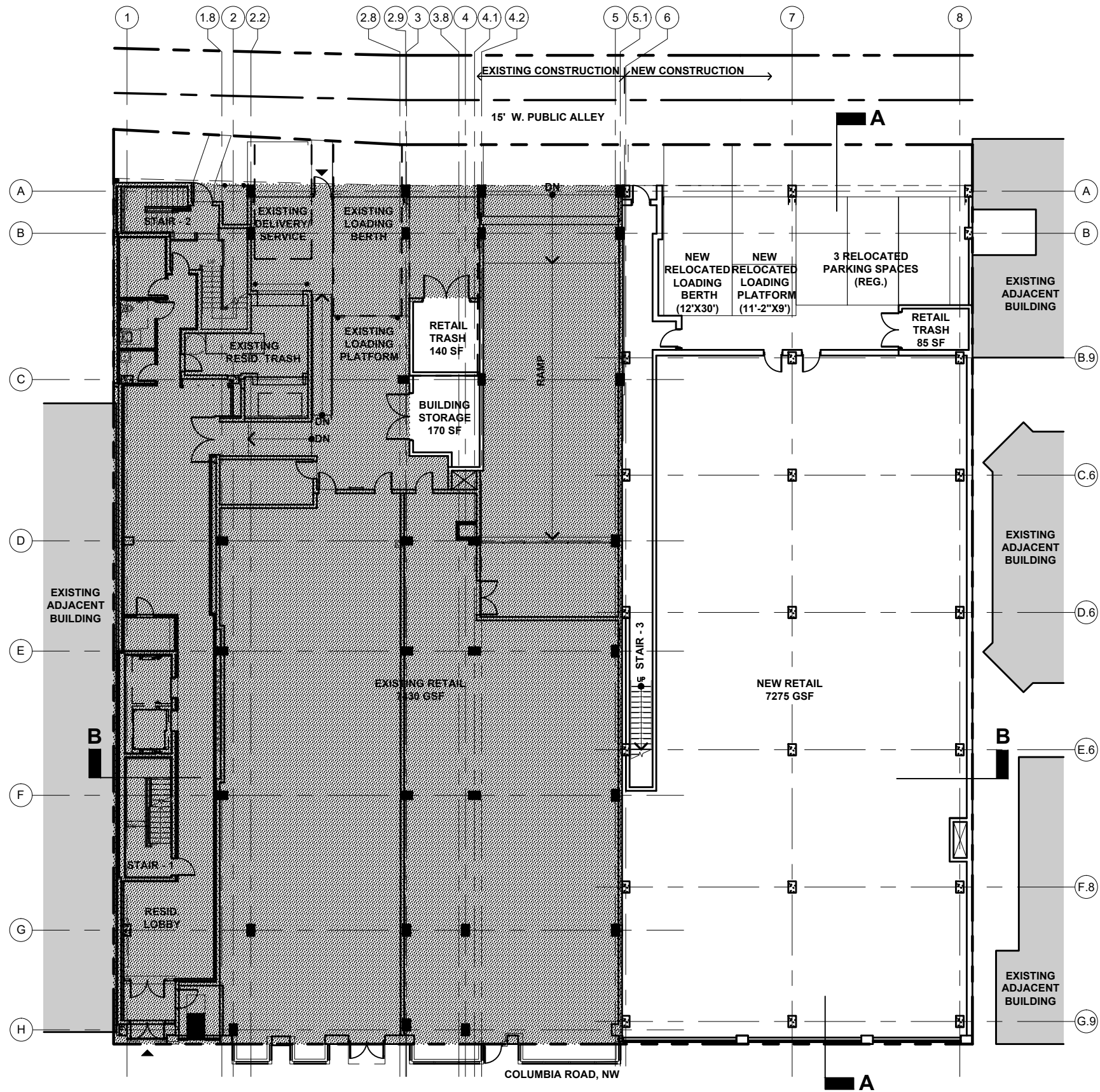
1777 COLUMBIA ROAD, NW

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ARCHITECTS



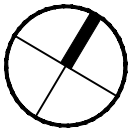
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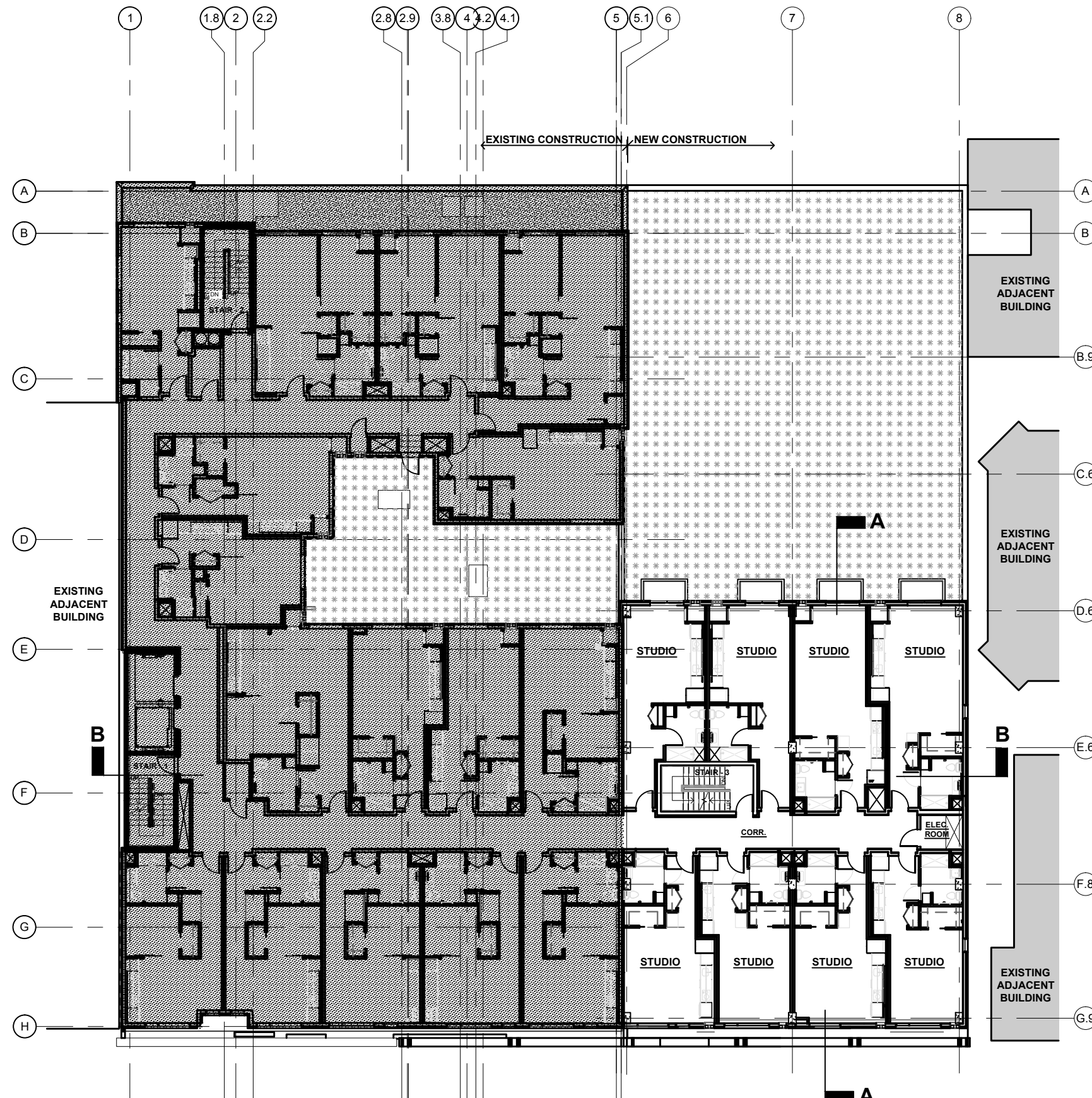
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
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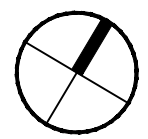
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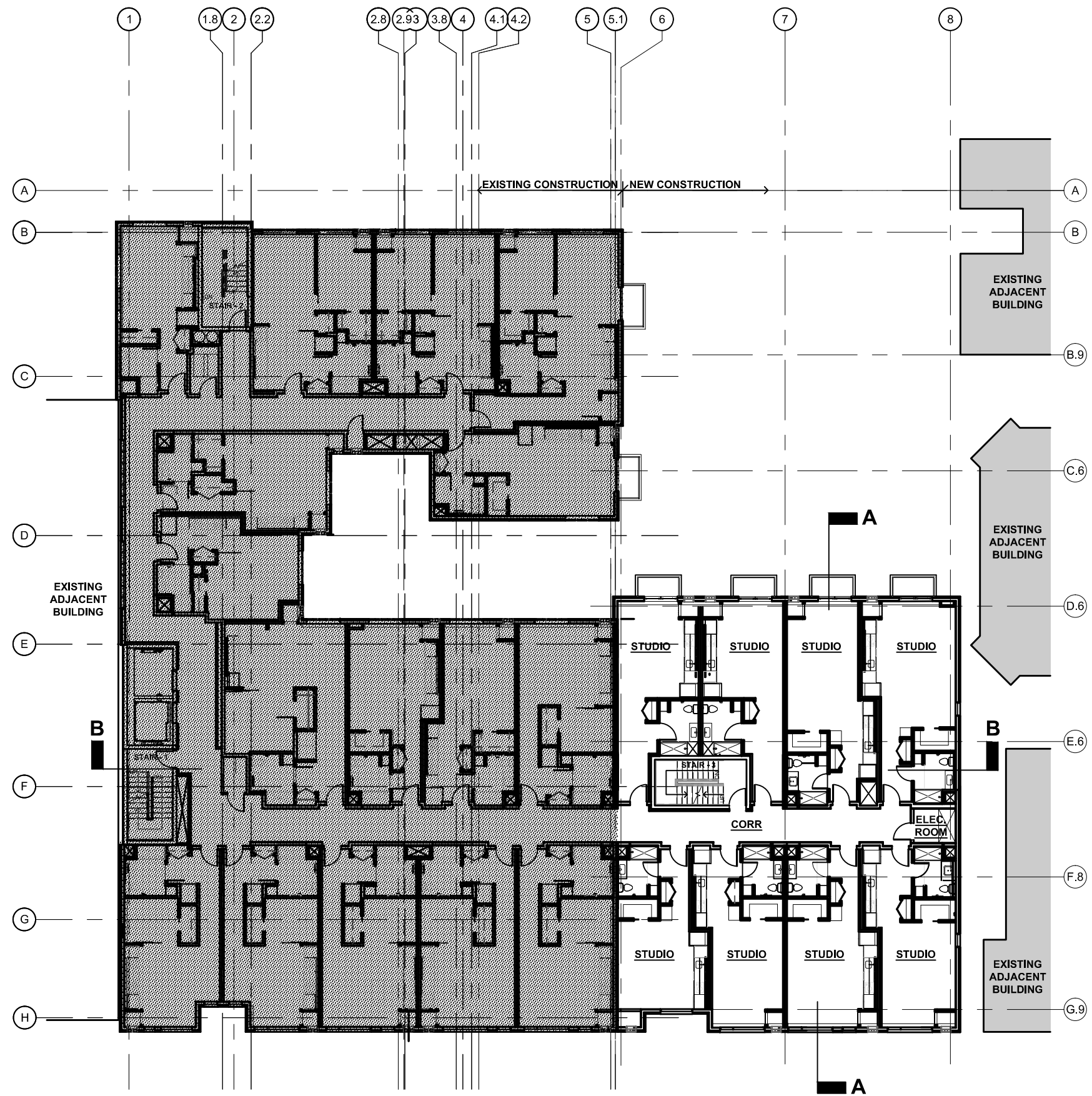




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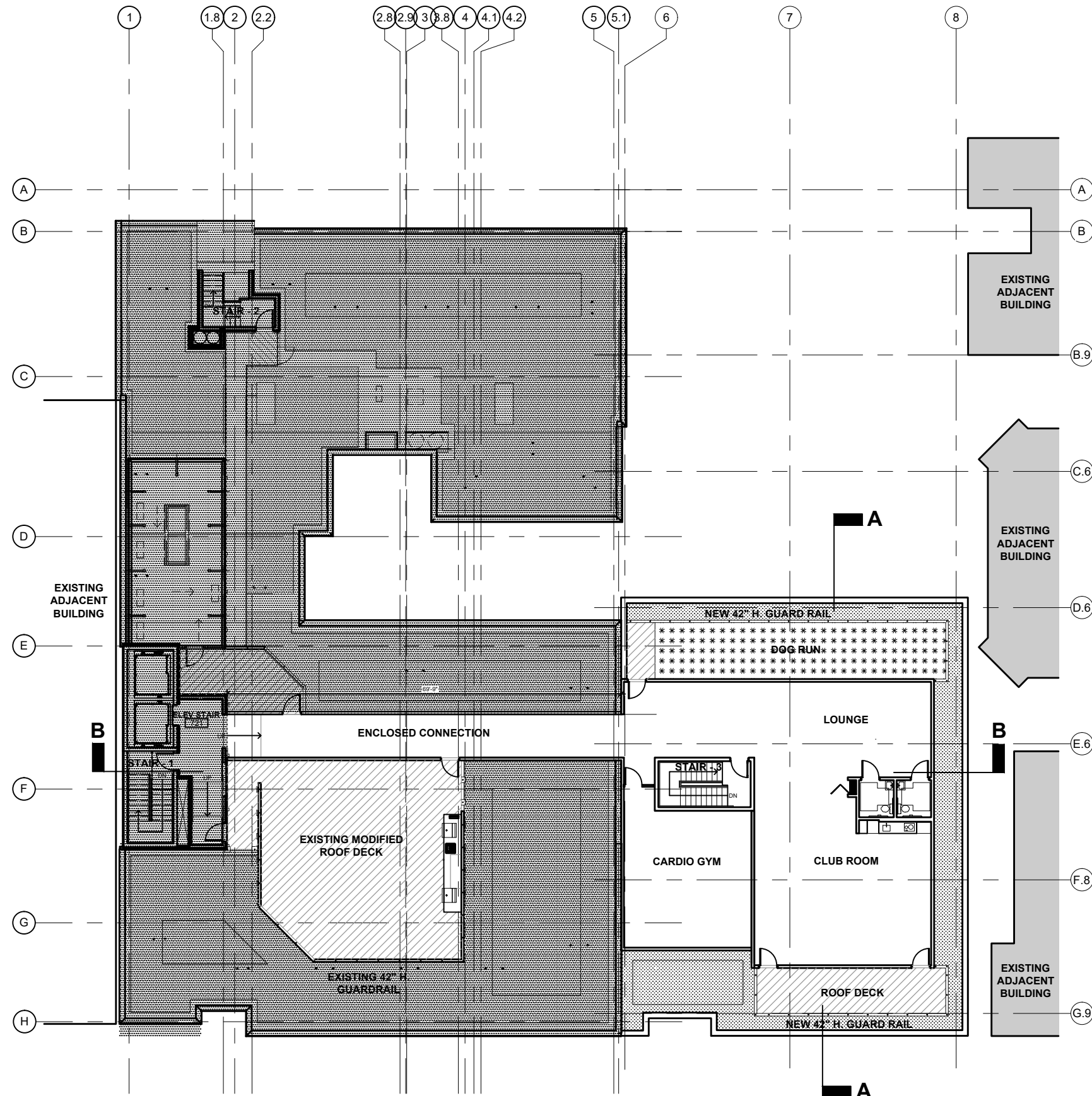
-  EXISTING CONSTRUCTION
-  NEW CONSTRUCTION





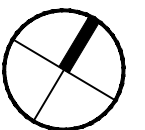
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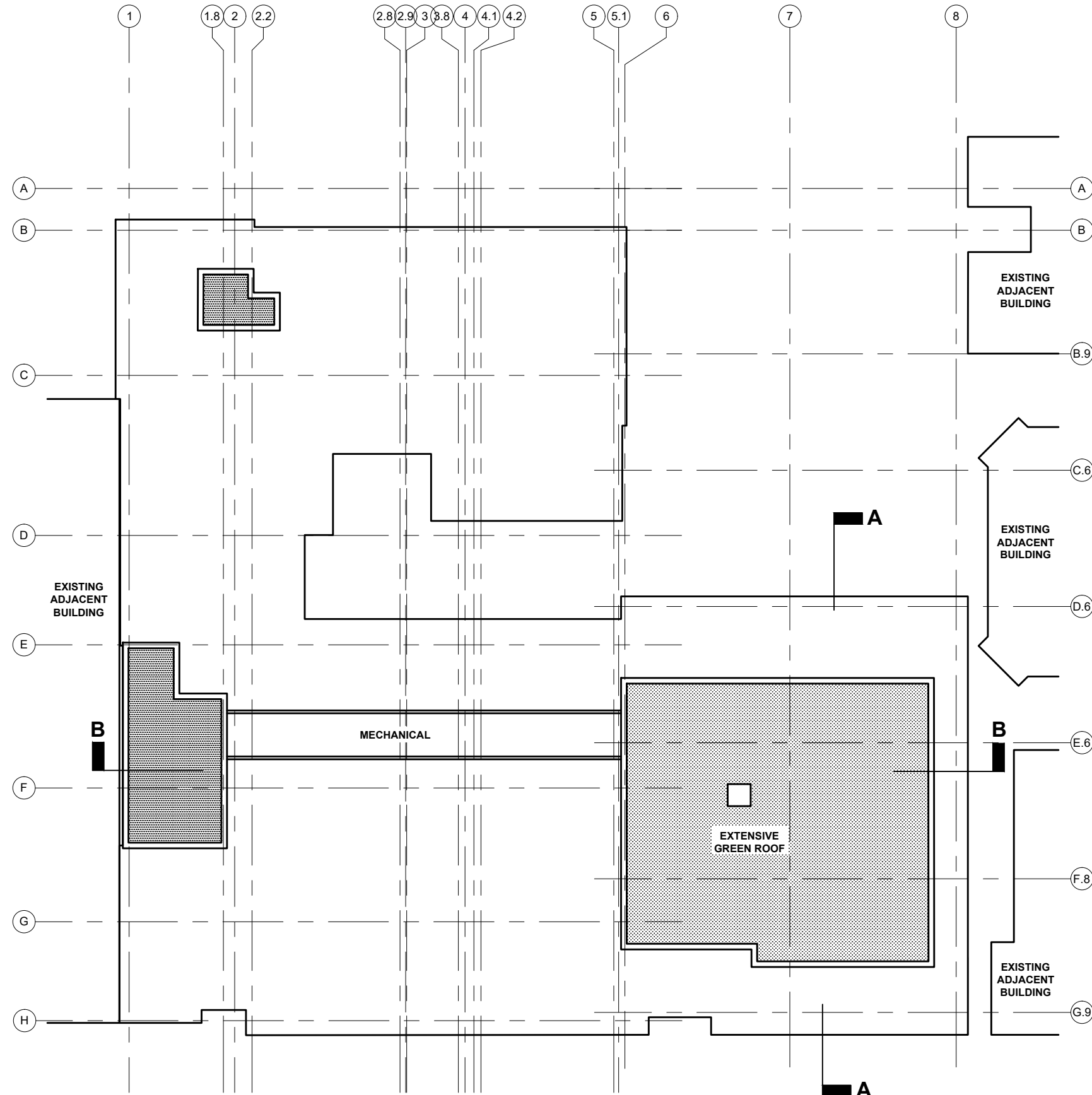
- EXISTING CONSTRUCTION
- NEW CONSTRUCTION





LEGEND:

- EXISTING CONSTRUCTION
- NEW CONSTRUCTION





LEGEND:

-  EXISTING CONSTRUCTION
-  NEW CONSTRUCTION



