

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: *JL for* Jennifer Steingasser, Deputy Director

DATE: May 27, 2016

SUBJECT: **Public Hearing Report for ZC #16-06**
1900 Half Street, SW
Design Review Under the Capitol Gateway Overlay

I. SUMMARY AND RECOMMENDATION

This application proposes the adaptive reuse of an existing office building to a mixed-use building that would meet the Capitol Gateway Overlay goals for providing a mix of residential and commercial uses.

The application successfully addresses most of the evaluation criteria of the Capitol Gateway Overlay and the Office of Planning (OP) recommends approval of the project subject to:

- Improved environmental design;
- Resolution of the shoreline treatment with the District Department of Transportation (DDOT) and District Department of Energy and Environment (DOEE);
- Additional information regarding the terrace spaces at the Riverwalk Trail, including materials, views, and sections; and
- Final design of the Riverwalk Trail.

OP also supports the requested height, loading and penthouse relief.

II. APPLICATION-IN-BRIEF

Location	1900 Half Street, SW Square 666, Lot 15 (Subject property is bounded by Water, T, and U Streets SW and the Anacostia River) Ward 6, ANC 6D
Applicant	Jemal’s Lazriv Water, LLC
Zoning	W-2 / CG (Waterfront / Capitol Gateway Overlay)
Site Area	110,988 square feet
Proposed Development	A 95-foot tall, 450,711 square foot, 4.06 Floor Area Ratio (FAR) mixed-use building

Relief	Pursuant to 11 DCMR § 1610.7, the following relief is requested in order to develop as proposed: <ol style="list-style-type: none">1. Variance from the maximum building height requirements of 11 DCMR § 1603.4;2. Variance from the loading requirements of 11 DCMR § 2201.1; and3. Special exception relief to provide multiple penthouses at multiple heights (§§ 411.6 and 411.9) and to provide penthouses that do not comply with the setback requirements from an open court (§ 411.18(c)(5)).
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III. SITE AND AREA DESCRIPTION

Square 666 is located in the southwest quadrant of the District and is bounded by T Street to the north, the Anacostia River to the east, U Street to the south, and Water Street and Half Street to the west. The Property is the only lot in Square 666 and has an angled rectangular shape with a total land area of approximately 110,988 square feet. The Property is improved with an existing and mostly vacant nine-story office building that was constructed in 1976. The existing building has a height of 90 feet and approximately 665,928 square feet of gross floor area or 6.0 FAR. The Half Street right-of-way is 80 feet wide in this location. On-site parking for 691 vehicles is located in the building and can be accessed via U Street SW. On-site loading is located on the north side of the building. The building was originally constructed for use by the General Services Administration (“GSA”) for Federal office tenants and has been used in this manner for several decades. Please refer to the vicinity map in Attachment 1.

IV. PROJECT DESCRIPTION

The Applicant proposes to redevelop the Property by renovating and adaptively reusing the existing building as a mixed-use apartment building with approximately 427 residential units and approximately 24,032 square feet of retail use. The Applicant is proposing to remove portions of the existing building by cutting out approximately 215,217 square feet of gross floor area (1.9 FAR), which will result in two open courts and a sideways “E”-shaped building that faces the Anacostia River. Sixteen loft units will front on the Anacostia River and will have private terraces adjacent to the Anacostia Riverwalk Trail.

The renovated building will include approximately 450,711 square feet of gross floor area (4.06 FAR), with approximately 374,584 square feet of gross floor area devoted to residential use and approximately 24,032 square feet of gross floor area devoted to retail use. Two and a half levels of parking will be provided for 312 vehicles (300 zoning-compliant spaces and 12 tandem spaces), with ingress and egress from T Street. The project will provide 210 residential long-term, 22 residential short-term, 12 retail long-term, and 7 retail short-term bicycle parking spaces. On-site loading will be provided in its existing location on the north side of the building adjacent to the parking entrance. The overall building height will remain at 90 feet for the majority of the building, except for a new 2 foot, 3 inch roof slab located on the center portion of the roof to reinforce the new rooftop mechanical equipment and amenity space, and a new 5 foot pool deck, also in the center portion of the roof.

The Applicant is proposing to re clad the building with terracotta rain screen as well as a combination of colored metal panels; metal spandrels and frame; and curtain wall vision glass. Blue colored metal panels will introduce color to the building façade at the upper levels.

The Applicant is proposing to construct the Anacostia Riverwalk Trail along the river frontage of the property. The Trail will feature two parallel paths – a ten-foot bike path adjacent to the

building, a five-foot landscape buffer, and a ten-foot pedestrian path at the River's edge. The Applicant is also proposing to continue the trail to the south at the Earth Conservation Corps property.

OP is supportive of the overall design of the building. Since initial meetings with OP, the design has evolved with a particular focus on the river-facing loft units and the design of the Riverwalk Trail. In the original proposal, there were two levels of loft units fronting the Riverwalk Trail with the first level of units at an elevation of 11.5 feet – at the same grade as the Trail and one foot above the 100-year flood elevation (10.6 feet). The revised proposal eliminates one level of loft units and raises the elevation of the remaining units to 14 feet, with the bike path at an elevation of 12 feet and the pedestrian path at 11 feet. The retail proposed for the ground floor of the building will serve to create an active and engaging pedestrian experience along Water Street and Half Street SW. The Capitol Gateway Overlay, as described in additional detail later in this report, seeks to create an active pedestrian and transit-oriented environment. This project should help achieve those aims with a cohesive pedestrian environment, additional residents in the neighborhood, and public access to the waterfront.

V. ZONING

The subject site is zoned W-2 / CG (Waterfront / Capitol Gateway Overlay). The W-2 district is designed to “encourage a diversity of compatible land uses at various densities, including combinations of residential, offices, retail, recreational, arts and cultural, and other miscellaneous uses” (900.4). The Capitol Gateway Overlay is intended to encourage a mix of uses while creating a pedestrian-friendly environment. The proposal as designed requires relief as noted below.

1. Variance from Height (§ 1603.4)

Subsection 1603.4 of the Zoning Regulations permits a maximum building height of 70 feet. The existing building has a height of 90 feet, which the Applicant proposes to maintain for the majority of the building. The Height Act would permit a building of 100 feet. However, relief is necessary because the Applicant proposes to install a 2 foot, 3 inch roof slab on the center portion of the roof, such that approximately 20% of the building at the upper roof level will have a height of 92 feet, 3 inches. The Applicant also proposes to install a five foot tall pool deck on the existing roof, such that approximately 4% of the building will have a height of 95 feet. Approximately 76% of the upper roof level will remain at the existing 90-foot height.

The Property is exceptional due to the presence of the existing nine-story office building, which the Applicant proposes to adaptively reuse and renovate as part of this application. The existing siting, ingress and egress locations, configuration of parking and loading facilities, height, core elements, and column spacing limit the Applicant's ability to modify or redesign the building without altering or compromising the building's structural integrity. The adaptive reuse of the structure has a direct impact on the ability to comply with the height and loading requirements.

The Applicant proposes to remove a substantial amount of the building's gross floor area in order to reduce the building's massing, provide enhanced public access to the Anacostia River, and maximize views. The proposed increased height will only be located in the center leg of the “E”-shaped building.

The building's existing roof slab was designed to be accessed by building maintenance staff and has the capacity to support approximately 25 pounds per square foot. To adaptively reuse the building for residential purposes, the Applicant proposes to provide residential amenity spaces on the roof, as well as new mechanical equipment for the retail and residential uses. The amenities and mechanical equipment would require a roof with the ability to support a load of 100 to 150 pounds per square foot. The Applicant indicates that it would not be possible to reinforce the existing roof slab without compromising the ceiling height of the upper floor of residential units.

The Applicant also proposes to provide a new pool deck and infinity pool on the roof, which would require a five-foot deck on top of the existing 90 foot building. In a new building, the Applicant could build the pool into and below the roof slab; however, the Applicant is maintaining and reinforcing the existing roof slab which would require the pool deck to be built above the roof slab. The 42 inch deep pool and associated support would require a five-foot deck.

Therefore, the Applicant is requesting a variance from the height requirements of § 1603.4 to allow 20% of the roof area to be built to a height of 92 feet, 3 inches to accommodate a reinforced roof slab and approximately 4% of the roof area to rise to 95 feet to accommodate the pool deck. The requested relief can be granted without substantial detriment to the public good and without substantial impairment to the zone plan. The majority of the building height will be maintained at 90 feet. The additional height would be set well back from the street and from the riverfront with limited visibility from below.

2. Variance from Loading (§ 2201.1)

Relief from the loading requirements of § 2201.1 is required because the Applicant proposes to maintain the building's existing loading facilities, which complied with the Zoning Regulations in effect as of the time that the building was constructed, but do not meet the minimum loading requirements set forth in the current Zoning Regulations.

Item	Required	Provided
55 foot berth	1	0
40 foot berth	0	1
30 foot berth	2	1
20 foot delivery space	2	1
100 square foot platform	2	
200 square foot platform	1	1 @ 211 square feet 1 @ 301 square feet

The Applicant is requesting a variance to provide two berths where three are required (one of which will be 40 feet instead of 55 feet), and to provide one 20-foot deep service/delivery space where two are required. Providing the required loading would result in a larger curb cut on T Street, which the District Department of Transportation (DDOT) does not support. The existing loading facilities should adequately serve the needs of the proposed residential and retail uses. The two uses should be able to share loading facilities with no detriment to the public good or zone plan.

3. Special Exception for Multiple Penthouses and Multiple Heights (§ 411.6 and 411.9)

Special exception approval is required pursuant to § 411.6, which requires that all penthouses shall be placed in a single enclosure. The Applicant has proposed a penthouse at the center leg of the “E”-shaped building that would enclose the residential amenity space (12 feet tall), mechanical equipment (16 feet, 1 inch tall), and a screen wall enclosing cooling towers and a designated outside air system (“DOAS”) (14 feet tall). The penthouses on the north and south legs of the “E”-shaped building would each enclose an egress stairwell (14 feet, 3 inches tall). The north leg of the building would also include a second DOAS unit with screen wall (12 feet, 9 inches tall). The Applicant is requesting relief under § 411.6 for multiple penthouses to allow for the second DOAS unit.

The Applicant also requests special exception relief from § 411.9 to permit the separate DOAS mechanical penthouse on the north leg of the building to have a separate height from the rest of the mechanical equipment. A single penthouse would result in operating difficulties for the proposed residential uses in the building as the two DOAS units need to maintain a physical separation and utilize separate duct work to provide fresh air into the residential units.

4. Special Exception from Penthouse Setback (§ 411.18(c)(5))

The Applicant has also requested special exception relief from § 411.18(c)(5), which requires penthouses to be setback 1:1 from exterior walls of an open court, for the three stair towers that provide roof access as they are not setback from the open courts in the center of the building.

The egress stairs exist and become exposed at the open courts where the Applicant has proposed to cut back the building. The proposed penthouses are setback at least 1:1 from all front, rear, and side building walls, including the River-facing facades, and the requested setback relief should not result in any negative impacts and should not adversely affect the light and air of any future adjacent buildings, nor would it impair the intent and purpose of the Zoning Regulations.

All other penthouses, raised roof levels, and guardrails conform to the 1:1 setback requirement.

VI. CRITERIA OF THE CAPITOL GATEWAY OVERLAY

The Capitol Gateway Overlay District lists a number of objectives for the overlay and provides specific criteria for the Zoning Commission review of proposed developments. The following is OP’s analysis of these standards as applied to the application.

§ 1600.2 The purposes of the CG Overlay District are to:

- (a) Assure development of the area with a mixture of residential and commercial uses, and a suitable height, bulk and design of buildings, as generally indicated in the Comprehensive Plan and recommended by planning studies of the area;**

The project proposes a mixed-use building featuring residential and ground floor retail (restaurant and service uses), which are called for by this section. The massing of the building is not inconsistent with Comprehensive Plan direction for the area, which calls for Medium Density Residential/Medium Density Commercial. The building height would be consistent with existing buildings in the area and the Applicant has proposed to reduce the bulk of the building and FAR.

The building as proposed would not be inconsistent with the regulations of the overlay that govern building form.

- (b) Encourage a variety of support and visitor-related uses, such as retail, service, entertainment, cultural and hotel or inn uses;**

The Applicant is proposing a residential building with ground floor retail. The 24,032 square feet of ground floor retail would be divided in to three to four retail spaces with restaurant and service/commercial uses. The ground floor retail should attract visitors to the area. The addition of 427 residential units proposed with this application would help support uses such as retail, service, food, beverage and entertainment in the Buzzard Point neighborhood.

- (g) Provide for a reduced height and bulk of buildings along the Anacostia riverfront in the interest of ensuring views over and around waterfront buildings, and provide for continuous public open space along the waterfront with frequent public access points;**

While a portion of the building, at 95 feet, exceeds what would be permitted in the zone, the Applicant is adaptively reusing an existing building, which has a height of 90 feet. The height is not inconsistent with other buildings in the area and the Applicant is sculpting the building in such a way as to provide setbacks from the Anacostia River.

§ 1603 Buildings, Structures, and Uses in the CG/W-2 District

- § 1603.2 No private driveway to any parking or loading berth areas in or adjacent to a building or structure constructed after January 7, 2005 shall directly face the waterfront.**

Not applicable as the building was constructed prior to January 7, 2005.

- § 1603.3 All buildings or structures constructed after January 7, 2005 on a lot that faces or abuts the Anacostia River shall be set back by no less than seventy-five (75) feet from the bulkhead, unless the Zoning Commission finds that such setback creates an undue economic hardship for the owner of the lot and in no case less than fifty (50) feet from the bulkhead.**

Not applicable as the building was constructed prior to January 7, 2005.

- § 1603.4 In the CG/W-2 District, the Zoning Commission, at its discretion, may grant bonus density for residential development in a building or a combined lot development, using a guideline of 1.0 FAR in excess of the normally-allowed maximum of 4.0 FAR and an additional ten (10) feet in excess of the normally-allowed maximum height of sixty (60) feet; provided that:**

- (a) The building or combined lot development shall include at least 2.0 FAR of residential development;**

- (b) **The Zoning Commission, at its discretion, may allow construction of such bonus density on the property zoned CG/W-2 or may allow only for the bonus density to be transferred off-site to a lot or lots zoned CG/CR; and**
- (c) **The provisions of §§ 1709.6 through 1709.12 and § 1709.14 shall govern the procedures for transferring bonus density off-site if permitted by the Zoning Commission.**

The existing building on the Property is non-conforming with respect to height and density. Section 1603.4 permits a maximum height of 70 feet and a maximum density of 5.0 FAR; however, the existing building has a height of 90 feet and a density of 6.0 FAR. The Applicant is proposing to adaptively reuse the existing building and maintain the existing building height of 90 feet with the exception of a portion of the roof, which would rise to a maximum of 95 feet. The Applicant has proposed to reduce the density from 6.0 FAR to 4.006 FAR, which is less than the maximum density permitted.

The project would comply with § 1603.4 (a)-(c), listed above, as follows:

- (a) Complies. The project would include approximately 3.36 FAR of residential development, which is more than the 2.0 FAR required under 11 DCMR § 1603.4(a).
- (b) The Applicant requests that the Commission preserve the Applicant's right to transfer any off-site bonus density credits that are created through this project.
- (c) The Applicant would comply with the provisions of 11 DCMR §§ 1709.6 through 1709.12 and § 1709.14 regarding transferable development rights

§ 1603.5 The Zoning Commission, at its discretion, may also provide for additional on-site or off-site bonus density to be earned for setbacks required under this section, based on the land area of the setback and the proposed features for public open space uses; provided, that 2.0 FAR based on the land area of the open space setback shall be used as a general guideline.

Not applicable.

§ 1610 Zoning Commission Review of Buildings, Structures and Uses

§ 1610.1 The following provisions apply to properties located:

- (c) **On a lot located within Squares 700 or 701, north of the Ballpark site;**
- (d) **On a lot that abuts South Capitol Street...;**
- (f) **Any lot which is the recipient of density through the combined lot provisions of § 1602.**

§ 1610.2 With respect to those properties described in § 1610.1, all proposed uses, buildings, and structures, or any proposed exterior renovation to any existing buildings or structures that would result in an alteration of the exterior design, shall be subject to review and approval by the Zoning Commission in accordance with the following provisions.

§ 1610.3 In addition to proving that the proposed use, building, or structure meets the standards set forth in § 3104, an applicant requesting approval under this section must prove that the proposed building or structure, including the siting, architectural design, site plan, landscaping, sidewalk treatment, and operation, will:

(a) **Help achieve the objectives of the CG Overlay District as set forth in §1600.2;**

The project satisfies the following stated objectives for the CG Overlay, as provided in § 1600.2, including:

- Assuring development of the area with a mixture of residential and commercial uses, and a suitable height, bulk, and design of buildings;
- Encouraging a variety of support and visitor-related uses, such as retail and service uses; and
- Providing for a reduced height and bulk of buildings along the Anacostia riverfront in the interest of ensuring views over and around waterfront buildings, and providing for continuous public open space along the waterfront with frequent public access points.

The proposed project would provide approximately 373,984 square feet of gross floor area devoted to new residential use and approximately 24,032 square feet of gross floor area devoted to new ground floor retail uses in a rehabilitated and adaptively reused building. The proposed design removes density to provide step-backs and step-downs to maximize riverfront views and create an aesthetically-pleasing design. The project also would include continuous public open space along the waterfront through the construction of the Anacostia Riverwalk Trail.

(b) **Help achieve the desired mixture of uses in the CG Overlay District as set forth in §§ 1600.2(a) and (b), with the identified preferred uses specifically being residential, hotel or inn, cultural, entertainment, retail or service uses;**

The project provides a mix of commercial and support retail/preferred uses in furtherance of the objectives of the CG Overlay.

(c) **Be in context with the surrounding neighborhood and street patterns;**

The project as proposed sets the tone for the redevelopment of the Buzzard Point neighborhood. The Applicant has proposed distinct façade articulation at each elevation, which creates an innovative design to connect the building to the surrounding street frontages, the Anacostia River, and nearby buildings. The Applicant will remove the existing parking access point at the southern portion of the Property in order to provide a consolidated parking and loading area at

the northern portion of the Property from T Street, thus eliminating curb cuts and minimizing potential pedestrian/vehicular conflicts.

(d) Minimize conflict between vehicles and pedestrians;

The Applicant has proposed to consolidate access for parking and loading on the north side of the Property, which would eliminate existing curb cuts at the south side of the Property.¹ The Applicant has proposed to construct a cycle track on T Street opposite the garage and loading access to provide safe access for bicyclists connecting with the Riverwalk Trail.² The Applicant has proposed extensive streetscape improvements on T, Half, and Water Streets SW, including curb, gutter, sidewalk, and planting strip.³ The proposed improvements would minimize potential pedestrian and vehicle conflicts.

(e) Minimize unarticulated blank walls adjacent to public spaces through facade articulation; and

Through the proposed sculpting of the building with open courtyards facing the Anacostia River, along with stepbacks at the roofline, and articulation of the northwest corner at the retail bay, the Applicant has proposed a building that offers façade articulation across all elevations. The use of colored metal panels and metal framing, along with expanses of glass provide a distinctive pattern and mixture of materials and fenestration.⁴ At grade, the Applicant has proposed to provide building entrances on all facades to either retail or residential spaces.⁵

(f) Minimize impact on the environment, as demonstrated through the provision of an evaluation of the proposal against LEED certification standards.

The Applicant indicated that the project would achieve LEED Silver certification.⁶ OP has suggested that the applicant work with DOEE to augment the environmental performance of this waterfront building and to examine a higher LEED equivalent rating.

1610.4 Buildings to be constructed on a lot within the CG/W-2 District:

(a) The building or structure shall provide suitably designed public open space along the waterfront;

The Applicant is proposing suitably designed and publically accessible open space at the waterfront. The property is adjacent to the Anacostia River and located partially within the 100-year floodplain. DOEE has indicated a preference for a living shoreline treatment at the water's edge. The Applicant has proposed bulkhead in certain locations, particularly where the existing building is sited close to the shoreline, which would allow for a cantilevered Riverwalk Trail but

¹ See Exhibit 15A3, Pre-Hearing Statement Tab A, Sheet 22.

² See Exhibit 15A4, Pre-Hearing Statement Tab A, Sheet 41.

³ See Exhibit 15A4, Pre-Hearing Statement Tab A, Sheet 39.

⁴ See Exhibit 15A3, Pre-Hearing Statement Tab A, Sheet 30.

⁵ See Exhibit 15A2, Pre-Hearing Statement Tab A, Sheets 13-14.

⁶ See Exhibit 15A2, Pre-Hearing Statement Tab A, Sheet 12.

would also result in the modification of the 100-year floodplain. Final resolution with DOEE is needed.

- (b) **A plan shall be included in the application for suitable open space treatment of the setback area for such uses as walkway and bikeway, passive or active recreational use, and including provisions assuring private maintenance of the space, convenient and permanent public access to the space, and suitable connections to adjacent public space along the waterfront;**

The Applicant has proposed to construct the Anacostia Riverwalk Trail along the project frontage. The Trail as proposed would include a ten to fourteen-foot path for biking (adjacent to the building), a five-foot landscape buffer, and a six to ten-foot pedestrian path.⁷ OP has indicated that the Trail section should be a minimum of a ten-foot bike path, five-foot buffer, and ten-foot pedestrian path. There appear to be some inconsistencies in the plans with respect to the Trail design in various locations and these should be resolved through continued coordination with DDOT and OP as design guidelines for the Riverwalk Trail are finalized.

Properties with frontage along the designated path for the Riverwalk Trail will be required to construct their segment of the trail as redevelopment occurs in the area. The minimum dimensions, as specified above are necessary to provide for continuity and connectivity along the length of the Trail. In addition to constructing the segment on the 1900 Half Street property, which would be accessible from the T Street SW right-of-way, the Applicant has proposed to continue the trail along the adjacent property that is the site of the Earth Conservation Corps facility, which would provide for a connection back to Half Street SW. As called out the Buzzard Point Vision Framework Plan, the Applicant has provided for an overlook park.⁸

- (c) **The application shall include a view analysis that assesses openness of waterfront views and vistas, and views and vistas toward the Capitol Dome, other federal monumental buildings, existing neighborhoods, South Capitol Street, and the Frederick Douglass Bridge.**

The architectural drawings provided with the application include a view analysis.⁹ While the view analysis provided shows the existing building in its context, the Applicant has provided renderings that better demonstrate the proposed projects relationship to the Capitol Dome, other federal monumental buildings, existing neighborhoods, and South Capitol Street.¹⁰ The building's height and mass along the river and Half Street exist and are unchanged; therefore, the building should have no detrimental impact on views and vistas of the identified monumental properties and focus areas.

§1610.7 The Commission may hear and decide any additional requests for special exception or variance relief needed for the subject property. Such requests

⁷ See Exhibit 15A4, Pre-Hearing Statement Tab A, Sheets 40 and 47.

⁸ See Exhibit 15A4, Pre-Hearing Statement Tab A, Sheets 37-40.

⁹ See Exhibit 15A2, Pre-Hearing Statement Tab A, Sheet 7.

¹⁰ See Exhibit 15A3, Pre-Hearing Statement Tab A, Sheet 32.

shall be advertised, heard, and decided together with the application for Zoning Commission review and approval.

As described in this report, the design of the project would require relief from height and loading, as well as multiple penthouses of multiple heights and penthouse setbacks.

VII. COMMUNITY COMMENTS

As of this writing OP has received no comments on the project from the community or the ANC. The Applicant notes that ANC 6D voted unanimously to support the project at its May 9, 2016 regular meeting.

VIII. DISTRICT AGENCY COMMENTS

As of this writing OP has received no comments on the application from other District agencies.

IX. SUMMARY OF OP COMMENTS

The Office of Planning is supportive of the design of the building, and the application generally addresses the criteria of the Capitol Gateway Overlay. OP can recommend approval once the following items have been addressed.

	Comment	Planning and/or Zoning Rationale
1	The Applicant should commit to a higher LEED-equivalent rating.	The proposed commitment to the very minimal threshold for LEED Silver is not adequate given the pressing need for the District to achieve a smaller environmental footprint and the project's location at the Anacostia River.
2	The Applicant should resolve the ultimate shoreline treatment in coordination with DOEE, DCRA, and FEMA.	The project, as proposed, would result in a modified 100-year floodplain elevation.
3	The Applicant should provide additional details regarding the terrace spaces at the Riverwalk Trail and should resolve any discrepancies in the plans.	Internally consistent plans are necessary for an adequate review by staff and the Commission. The experience of the residents, as well as the waterfront experience of the public, is an important issue for the District and for the ultimate redevelopment of the Buzzard Point neighborhood.
4	The Applicant should work with OP to finalize the design of the Riverwalk Trail per the Guidelines.	Internally consistent plans are necessary for an adequate review by staff and the Commission.

X. ATTACHMENTS

1. Vicinity Map

JS/emv

ATTACHMENT 1 VICINITY MAP

