

City of Alexandria, Virginia

MEMORANDUM

DATE: SEPTEMBER 7, 2016

TO: CHAIRMAN AND MEMBERS OF THE
OLD AND HISTORIC ALEXANDRIA DISTRICT
BOARD OF ARCHITECTURAL REVIEW

FROM: HISTORIC PRESERVATION STAFF

SUBJECT: CONCEPT REVIEW OF 203-205-211 THE STRAND
BAR CASE # 2016-00268

I. CONCEPT REVIEW PROCESS

Concept Review

The material before the Board is part of a BAR Concept Review Work Session for a single mixed-use project that includes redevelopment of the strip retail building located at 211 The Strand and changes to 205 The Strand. The existing historic warehouse building at 203 The Strand is part of the three properties potentially being purchased but the use and structure will remain unchanged.

The Concept Review Policy was adopted by the Boards of Architectural review in May 2000. Concept Review is an optional, informal process at the beginning of a Development Special Use Permit (DSUP) application whereby the BAR provides the applicant, staff, the Planning Commission and the City Council with comments relating to the overall appropriateness of a project's height, scale, mass and general architectural character. The Board takes no formal action at the Concept Review stage. However, if, for instance, the Board believes that a building height or mass is inappropriate, or if the demolition of an existing structure required for construction of the project would not be supported in the future, the applicant and staff should be advised as soon as possible. This early step in the development review process is intended to minimize future architectural design conflicts between what is shown to the community and City Council during the DSUP approval and what the Board later finds architecturally appropriate for a Certificate of Appropriateness under the criteria in Chapter 10 of the Zoning Ordinance and the BAR's adopted *Design Guidelines*

Process

At this time, the BAR is being asked to provide guidance on the height, scale, mass and general architectural character of the proposed construction. This project will also be reviewed by Development staff for compliance with the goals and objectives envisioned in the Waterfront Plan adopted by City Council in 2012.

A Permit to Demolish for the existing structure at 211 The Strand and partial demolition of 205 The Strand will be formally submitted at a later time but a draft of the history report on the 205 The Strand building has been provided by the applicant and if the BAR believes the addition of a third floor to this building is inappropriate, that concern should be raised now.

II. HISTORY

The history of the block and the adjacent area provides context and guidance for the Board as to what might be architecturally appropriate in this location. This block is representative of the evolution of a typical waterfront block east of Union Street. The block — bounded by The Strand, South Union, Prince and Duke streets — contains at least the core of five historic buildings that have had subsequent additions and alterations. An overlay map shows the 1749 shoreline with an 1845 map and a current aerial photograph (see Figure 1), indicating that 50% of the subject property was under water in 1749. By 1845, the parcel had been filled in and contained a warehouse with piers running east to The Strand.



Figure 1. 2007 aerial image with 1749 shoreline based upon 1845 map by Maskell Ewing, subject property outlined in red.

The warehouses located at 204 and 206 South Union Street represent typical warehouse buildings: simple vernacular, load-bearing masonry structures containing punched window openings and whose footprint covers the entire parcel. Historic map research indicates building heights on this particular block were two-, three-, and four-stories. The floors of these warehouses would, generally, have been 12-15 feet in height, resulting in building from 48 to 60 feet tall. This block also had three east-west alleys, one of which was a small-scale pedestrian alley, likely intended for fire separation, roof drainage, and loading access. As the warehouse buildings typically occupied their entire parcel and these uses filled the entire block, such alleys would have been useful for providing waterfront access from South Union Street. Compared to residential and commercial buildings on adjacent blocks to the west, the waterfront buildings represented a completely different scale, height, orientation and architectural character.

The applicant has supplied a property history (attached) that describes the evolution of the site. The History Appendix to the Waterfront Plan and staff's preliminary research note that the

buildings at 203 and 205 The Strand were built **circa 1900**, following the devastating 1897 Pioneer Mill fire to the south. Both structures, however, incorporate partial stone walls from the earlier warehouses that occupied the sites. The retail center in the masonry building at 211 The Strand, known as the Village on The Strand was designed by Lewis/Wisniewski & Associates and approved by the BAR in **1978**.

III. STAFF ANALYSIS

Due to the prominent location of this project, there is a higher level of review and analysis to ensure that the proposed design meets additional criteria set forth by the Zoning Ordinance and City Master Plan. The analysis below considers the elements which must be considered as part of the Board's review. These include:

1. Context for Historic Buildings on the Waterfront;
2. Architectural Analysis of Current Proposal;
3. The *Standards* outlined in Chapter 10 of the Zoning Ordinance, including *Additional Standards — Potomac River Vicinity*;
4. The *Design Guidelines for the Old and Historic Alexandria District and the Parker-Gray District*, including Chapter 8: Buildings along the Waterfront (adopted in May 1993);
5. *The Potomac River Vicinity Height District* as established in Chapter 6 of the Zoning Ordinance; and
6. The *Alexandria Waterfront Small Area Plan* and Model (adopted January 2012).

1. Context: Historic Waterfront Buildings

To determine appropriate infill construction along the waterfront, it is important to consider the historic character and architecture of this area, as it is distinct from other parts of the historic district. As a result, what might be considered appropriate and compatible along the waterfront may not be appropriate and compatible in other areas of the historic district. Historically, waterfront buildings, often warehouses, were significantly larger and less “high-style” than buildings in other parts of the City. As the *Design Guidelines* note, “the historical height of waterfront structures is 40 to 45 feet” and “the traditional width of buildings along the waterfront varies widely, but generally ranges from 35 to 100 feet.” Warehouses were often four stories in height and occupied the entire lot, without setbacks or open space. Their gable ends were generally oriented toward the river, a feature precluded in the rest of Alexandria under the 1752 ordinance to prevent roofs draining on to a neighbor's property. Historic photographs, such as *Figure 2* with a circa 1865 view of the waterfront from Pioneer Mill, shows a series of warehouse buildings, several four stories in height, with a strong visual presence on the Strand. The warehouses were both visually and physically connected to the piers and the waterfront beyond. *Figure 3* depicts McVeigh's and Reardon's warehouses and illustrate the size of such warehouses, one eight bays in width and the other eleven bays. Further, as shown in a panoramic view, the warehouse roofs had a rhythm—some gable, some shed roofs—that provided visual variety along the waterfront and broke up the massing of these large buildings (*Figure 4*).

While Fitzgerald's Warehouse, located at the southeast corner of King and Union Streets at 6 King Street/104 South Union Street, is representative of a late 18th-century warehouse, it is unique east of Union Street for being this old. Much of the present land east of Union Street was tidal marsh when Alexandria was founded and did not begin to be filled in until the late

18th century. Some areas east of the Strand were not filled in until the mid-20th century. Further, as an active port, the Alexandria waterfront was subject to numerous fires over the years. These fires, combined with advances in building and roofing technology which allowed for the construction of larger and larger warehouses, resulted in the replacement of any 18th-century buildings. Therefore, the buildings for which we have photographic images and the vast majority of the remaining historic warehouse buildings on the waterfront are 19th- and 20th-century buildings.



Figure 2. View from Pioneer Mill, May 1865. (First known photograph of the 200 Block South of The Strand)
Alexandria Library-Local History/Special Collections.



Figure 3. 100 Block South of the Strand ca. 1910, McVeigh's and Reardon's Warehouses. *Alexandria Library, Special Collections, William F. Smith Collection.*



Figure 4. Panoramic View of Alexandria at Duke Street and Strand taken from Pioneer Mills looking northwest, 1865. *Alexandria Library, Special Collections, William F. Smith Collection*

2. Architectural Analysis of Current Proposal

The proposed scheme generally has the appropriate architectural character for a waterfront building. The design references large 19th-century buildings with its clearly articulated punched openings on all elevations.

The massing of the building is broken up through the use of differentiated building blocks—with different roof lines and different architectural vocabularies. The end elevations on The Strand and South Union Street each read as two separate buildings, which is consistent with the four abutting buildings to the north. The side elevations, fronting on the pedestrian alleys each appear as three different buildings. The roof heights range from four stories to five stories on the street-facing elevations. While Staff believes that the proposed scheme is generally in conformance with the Additional Standards for the Potomac River Vicinity outlined in Chapter 10 of the Zoning Ordinance, as well as the Board's adopted *Design Guidelines* and policies, as outlined below there are aspects of the design that require further refinement as the project evolves.

The Strand Elevation

The Strand elevation will be the most visible elevation of this building once the expansion and improvements for Point Lumley Park are completed. Due to its prominent location, it must be proportional and well-designed. The applicant has studied several alternatives for The Strand elevation which appear to be separate but related buildings, using different brick colors and a subtle change in details. The scale of this building-and-addition character can be accommodated because there is more open area in the park and river to the east than there will be on South Union or along the pedestrian alleys of the north and south elevations. The use of pilasters and a pronounced cornice are more high-style than historic photographs suggest for this block, and for that reason, staff prefers the Alternate 1 east elevation that has punched windows and a lighter colored brick on the northern portion of the building. The south elevation retains simple classical pilasters, though there are several examples of higher-style commercial buildings and warehouses such as the Crilley Warehouse on North Lee Street or the Corn Exchange at 100 King Street that provide historic evidence of such an approach along the 19th century waterfront. Staff suggests that the proportions of the southern portion of the building may be more classically appropriate if the white top floor were incorporated into the red brick portion below and pilasters extend to the cornice. As the design is refined, ensuring stylistic compatibility with its context will be essential.

South Union Street Elevation

The west elevation quite successfully reads as two separate buildings and the scale and detailing relate well to other historic buildings on South Union Street. Again, Alternate 1 for the west elevation is more refined and complies with the zoning requirement that the street façade set back above 30'. It will be essential to minimize the presence of the garage entrance on this street to the greatest extent possible and to focus attention on the retail storefront.

North and South Elevations

Both the north and south elevations read as three separate “buildings” with a large center building which is broken down by flanking elements with multi-story balconies. Although these elevations read in plan as large and continuous, staff notes that they are adjacent to pedestrian alleys and other buildings and will not be viewed as one elevation. Therefore, the change in “building” typology helps to break down the scale. Staff strongly supports the extensive balconies and suggests that they could be further differentiated from the south to the north elevation. Additionally, the first floor of the north elevation has many blank areas at ground level along the alley. This presents key opportunities to include historic interpretation or public art and this approach should be integrated early in the design process.

Addition at 205 The Strand

The applicant’s proposal has little information on this building except for notations that a full third floor addition is proposed and a streetscape showing that The Strand elevation would replicate the second story at the third story. The applicant has indicated that they would remove the stucco and restore the fenestration and masonry on the first two floors of the original building. From preliminary research, it appears that this building, which mostly dates from circa 1900 but incorporates some 19th-century stone and brick walls, was also altered throughout the 20th-century. The roof does not appear to date to the earlier period of construction and the fenestration appears significantly altered. Conceptually, staff can support a third story addition of some type but more information needs to be supplied to confirm whether it is appropriate for such an addition to read

simply as an extension of the front elevation or whether the top floor of the east façade should be subtly distinguished as a later addition. It is always challenging to find matching brick when raising a brick building so some variation, or possibly, a setback, may be necessary.

3. Additional Standards—Potomac River Vicinity

Chapter 10 of the Zoning Ordinance outlines regulations related to Historic Districts and Buildings within the City. The chapter establishes the Boards of Architectural Review and also outlines *Standards* that the Boards must consider when reviewing an application for a Certificate of Appropriateness. In addition to the Standards applied to all buildings within the historic districts and those buildings listed as 100 Year Old Buildings, the Zoning Ordinance establishes additional standards for both Washington Street and the Potomac River Vicinity. These additional standards provide guidance for these prominent areas, each with its own distinctive architectural character.

Section 10-105(A)(4) Additional standards—Potomac River Vicinity. Within the Potomac River Vicinity Height District, in addition to the provisions of section 10-105(A)(2), the following standards and guidelines, to the extent relevant in each individual case, shall apply in considering an application for a certificate of appropriateness by the Old and Historic District Board of Architectural Review, or by the city council on appeal, for any building in excess of 30 feet in height when such height has been authorized by a special use permit.

(a) The degree to which facades of a proposed building or buildings are generally in alignment with the existing street edges and express the 20- to 30-foot bay width typically found within the historic district. Techniques to express such typical bay width should include changes in materials; articulation of the wall surfaces; changes in fenestration patterns; varying roof heights; and physical breaks within the massing. Large expanses of unbroken or repetitive facades are disfavored.

The proposed design incorporates a traditional architectural vocabulary with its rhythmic fenestration with clearly articulated openings. Each elevation also expresses historic bay widths and proportions. The proposed roof forms—stepped parapets and flat roofs—are historically appropriate to the late 19th-century and early 20th-century. The change in materials and setbacks are differentiated enough to allow for variety. The setbacks of at the fifth story on the street elevations and the deep balconies on the side elevations help to physically break the massing.

(b) The degree to which building materials characteristic of buildings having architectural merit within the historic district are utilized. The texture, tone and color of such materials should display a level of variety, quality and richness at least equal to that found abundantly in the historic setting. The use of synthetic or imitative materials is disfavored.

The concept review submission suggests the use of high-quality, historically-appropriate materials including various brick colors with historically-inspired detailing. As the design evolves, Staff and the Board will discourage the use of inappropriate materials and encourage historically appropriate materials for a waterfront building, such as the

inclusion of Potomac River granite at the foundation. Staff also supports the introduction of painted brick for some elements of the building, since this was a common practice during the late 19th and early 20th centuries.

(c) The degree to which new construction reflects the traditional fenestration patterns found within the historic district. Traditional solid-void relationships (i.e., masonry bearing wall by a veneer system) should be used in building facades which are directly related to historic streetscapes.

The proposed scheme maintains traditional fenestration from the 19th and 20th centuries. The first floor features large plate-glass storefront windows and doors, recalling historic loading docks and appropriate for these public retail spaces. The upper stories have punched window openings within load-bearing masonry walls. The fenestration includes paired windows and single windows. Further, as the project is required to be LEED Silver or equivalent, per the City's Green Building Policy, the windows should be operable—historically and environmentally appropriate.

(d) The degree to which new construction on the waterfront reflects the existing or traditional building character suitable to the waterfront. "High style" or highly ornamented buildings are disfavored. Also disfavored are metal warehouses and nondescript warehouse-type structures.

The proposed design is neither a non-descript mid-20th-century warehouse nor a “high-style” warehouse with inappropriately applied ornamentation. The proposed scheme utilizes a traditional architectural vocabulary for a historic commercial warehouse and it is compatible with its neighbors on both The Strand and South Union Street elevations. Its character is defined by its massing and fenestration. However, the ornamentation that does exist, such as pronounced cornices, is consistent with historic waterfront warehouses and is well-detailed.

(e) To the extent that any provisions of section 10-105(A)(2) are inconsistent with the provisions of this section 10-105(A)(4), the provisions of this section shall be controlling.

Staff finds the proposed design to be consistent with the additional standards of the Potomac River Vicinity.

4. BAR Design Guidelines for Buildings along the Waterfront

In addition to the Board's *Design Guidelines* for the historic districts, the “waterfront area of the Old and Historic Alexandria District is subject to certain additional requirements over and above those generally required for approval of a certificate of appropriateness.” The intent is for an “overall design attempt to reflect the traditional vernacular architecture found along the waterfront.” Therefore, in addition to the requirements of the Zoning Ordinance for the Height District and the additional standards for the Potomac River Vicinity, the Board has adopted separate chapter of the *Design Guidelines* with which to consider when reviewing an application such as this.

Development Form

The Board strongly discourages mews type residential projects which are inward looking and do not contribute to street life.

The proposed mixed-use project is clearly oriented to two street elevations with an emphasis on access to the waterfront through the two adjacent pedestrian alleys. Unlike nearby mews-style residential projects, the design is integrated into the existing street grid and provides a clear public connection to the waterfront and future park. The buildings also appropriately engage the publically accessible pedestrian alleys on the north and south sides.

Style

No single architectural style is mandated. However, there is strong preference on the part of the Board for buildings which reflect the traditional architectural styles found in the historic district. Designs generally should complement and reflect the architectural heritage of the City. For example, abstraction of historic design elements is preferred to a building design which introduces elements that have no historical basis in the districts. However, direct copying of buildings is discouraged.

The proposal uses Alexandria-inspired late 19th-century commercial architectural styles, typical of the historic district. The proposed design maintains the character-defining features of masonry buildings found on the Alexandria waterfront for centuries.

Required Bay Width

The expression of the required bay width may be made by changes in materials, articulation of the wall surfaces, changes in fenestration, varying roof heights and/or physical breaks within the building mass. For example, window patterns and changes in materials can be used to delineate the expression of a bay.

The proposed scheme features traditional bay widths at both the first story and upper stories. The use of hyphen elements further differentiates the bays and breaks up the massing while maintaining rhythm.

Height

The historical height of waterfront structures is 40 to 45 feet. New buildings in the waterfront area should reflect this historical relationship. The height of the first floor should be approximately 12-15 feet to reflect the traditional configuration of waterfront buildings.

The proposed building height ranges from 40 feet to 50 feet, or from four stories to five stories. Staff finds this consistent with historic warehouses which often featured floor-to-ceiling heights of 12-15 feet. Further, based on a survey of the existing buildings along the waterfront as part of a report on Existing Waterfront Resources Design Analysis, completed in December 2011, several existing buildings—both historic and recent—are 50 feet or higher at the street wall.

The applicant has provided a streetscape to show the proposed building within the context of existing buildings. The streetscape shows that on Union Street and The Strand, the height of the proposed building will not overwhelm nearby historic buildings. This particular proposal will help

to “fill in” this block by converting a mostly surface parking lot to an appropriately scaled building more in keeping with historic building development patterns on this block.

In February 1995, the Board did a conceptual review for a residential mixed-use project at 220 South Union Street (also 211 The Strand) known as Village on the Strand. This case was the first time that the Board applied the Additional Standards-Potomac River Vicinity to a project. The Board also reviewed the project for compliance with the Potomac River Vicinity Height District in order to advise the Planning Commission and City Council on design issues pertinent to this project. The minutes of the February 1, 1995 Old and Historic BAR hearing noted that the Board “endorsed the overall design concept of the building presented and found the scale and mass of the proposed 50’ height appropriate for the adjacent historic area conditional upon enhancement of the pedestrian experience.” The staff report analysis also noted that the literal 30’ height need not be maintained for the entire façade because “in carefully reviewing the varying heights and setbacks of the existing historic and probable future development surrounding this specific block, Staff found no particular relationship to a 30’ height.” The Board focused primarily on the pedestrian experience, materials and architectural character, rather than a specific height.

Width

The traditional width of building along the waterfront varies widely, but generally ranges from 35 to 100 feet. New buildings should generally reflect this traditional size.

Staff finds that the proposed project, and the division of the building into smaller “buildings”, allows the project to maintain traditional building widths and scales, reflective of the historic waterfront photographs.

Siting

There should be little or no setback from the principal street or other lot lines.

The proposed building footprint has not been set back on either street. The building has been sited to provide substantial pedestrian alleys on both the north and south elevations in accordance with the Waterfront Plan. On the south elevation, the pedestrian alley will combine with the alley and courtyard of the hotel at 220 South Union Street. On the north side, the pedestrian alley will provide through-block porosity while also allowing visibility and access to the side elevations of historic waterfront warehouses

Parking

Parking should be provided in or behind a new structure. Parking lots to the side of a building and open to the street disrupt the traditional street wall and are strongly discouraged. Additional information is provided in the Parking section of Chapter 2, Building Alterations.

Providing adequate parking is a challenge on this particular site. The project proposes a garage entrance on South Union Street in the approximate location of an existing curb cut to the parking lot. It is far preferable to have parking accessed from South Union Street rather than The Strand which is envisioned as an enhanced pedestrian space with limited automobile traffic and fronts onto the future waterfront park. There exist other garage entrances in the 100 and 200 block of South Union

Street and the applicant should work to minimize the impact of the garage on this block as the design develops. A full parking analysis will be completed as part of the DSUP process.

Fenestration

The fenestration pattern, that is the relationship of solid to void, such as walls and windows, should be compatible with the historic fenestration patterns along the waterfront. There should be a large ratio of void to solid on the first floor of the structures (i.e., large windows). However, curtain wall buildings which express very large areas of void are discouraged. First floor retail uses should have large paned storefront windows.

The proposed fenestration represents a traditional fenestration patterns found in the historic districts. Large paned storefront windows are proposed on the street elevations and will provide clear visual access to the lobby and retail spaces.

Roof

The roof form should reflect the traditional roof form patterns found in the waterfront area. For example, gable roofs should be oriented perpendicular to the river.

The roof is a flat roof on the building but employs varying heights (four stories vs five stories) and different techniques such as pronounced cornices and stepped parapets to provide variety.

Spacing between Buildings

The traditional spacing between buildings along the waterfront varies widely, from virtually zero to several dozen feet. It is generally preferred that new buildings reflect the pattern of spacing between buildings evident along the blockface in order to maintain a consistent rhythm.

The proposed scheme is consistent with building spacing and alley location on this particular block. Historic map research depicted three east-west alleys on this block and the southern pedestrian alley will be located in the approximate location of one of the earlier alleys. In addition, the construction of the building to the street faces further continues historic spacing and building siting.

Architectural Detailing

Although historic warehouse structures along the waterfront were utilitarian buildings, they generally display more architectural embellishment than contemporary commercial buildings. Architectural detailing such as cornices, lintels, arches, and chimneys should, therefore, express the traditional quality and quantity of architectural detailing found on historic structures along the waterfront.

While few architectural details are provided as part of an initial concept review, the proposed elevations indicate an appropriate balance between well-detailed embellishment and a vernacular aesthetic. As the project evolves, the applicant will be held to a high standard for architectural detailing yet the applicant will be discouraged from using high-style ornamentation.

Materials

The predominant building materials for buildings in the historic waterfront area are stone and brick. Stucco coatings were very rarely used in the historic waterfront area. The building materials for new structures should reflect these traditional materials.

While a full materials palette is not usually presented as part of an initial concept review, the applicant has indicated that traditional materials, such as brick, stone and metal, will be used on this project. Potomac River granite foundations are characteristic of historic waterfront buildings and the proposed rusticated stone foundation will provide additional at-grade texture and to place the building contextually.

Building Orientation

The front entrances of new buildings should be oriented to the principal street frontage and be clearly articulated. Entrances for new commercial, retail and multi-family construction must meet the requirements for accessibility for persons with disabilities established by the ADA and the Virginia USBC.

The building is oriented to both streets upon which it fronts which is the appropriate orientation for this site.

Color

The color proposed for new buildings should be compatible with that in use on historic buildings in the districts. The B.A.R. Staff has developed a 'Color Chart of Historically Accurate Paint Colors in the Old and Historic Alexandria District and the Parker-Gray District' which can be consulted to help determine appropriate colors which reflect the historic heritage of the City.

Color selections are not typically determined during the concept review process. Staff encourages the applicant to continue to refine the color scheme and materials palette as the project evolves.

In general, the proposed design is in conformance with the Board's *Waterfront Design Guidelines* and is compatible with surrounding buildings of historic merit and appropriate for a waterfront building. Staff has identified improvements for The Strand Street elevation, particularly important due to its location fronting onto a future public park and the Potomac River. As envisioned in the Waterfront Small Area Plan and related conceptual model, a clear pedestrian alley openings were provided from Union Street to The Strand.

5. Potomac River Vicinity Height District

The City has six height districts, identified on the Height District Map adopted as part of the zoning map. The height districts limit the heights of buildings and structures. While principally the purview of the Planning Commission and City Council when considering an application for an SUP for increased height, and redundant with some aspects of the Additional Standards for the Potomac River Vicinity of Section 10 of the Zoning Ordinance, these standards are an applicable part of the Zoning Ordinance for the BAR to consider and to provide guidance in its recommendations to Planning Commission and City Council.

The subject property is located within the Potomac River Vicinity Height District which limits the maximum height of a building or structure to **30 feet** but permits a maximum of 50 feet with approval of a special use permit. The Zoning Ordinance notes that the additional height should be transitioned, such as with a step back for the portion above 30 feet at the street or water face, but does not specifically direct how the height is to be transitioned. While the requirement to set back may not be waived by the BAR or the City Council on appeal, the BAR is charged only with determining the degree to which the proposed structure complies with the setback requirement.

The Existing Resources Design Analysis, prepared by staff for the Waterfront Work Group in 2011, reviewed the existing buildings to determine whether they are consistent with the height district. As background, several prominent historic buildings, including 101, 105 and 201 North Union Street, as well as 204 and 206 South Union Street, do not meet the existing requirements. Further, several non-historic waterfront buildings, including 211 North Union Street, 110 South Union Street and the Harborside Condominium development were constructed prior to adoption of the height district requirement and also exceed the present height limits and setback requirement of the Zoning Ordinance. Finally, several of the buildings which do meet the Height District requirements, such as the former Robinson Terminal South and the Beachcombers at 0 Prince Street, are not consistent with the general architectural character of 19th-century warehouses required by the *Design Guidelines*. Many of the archetypal 19th-century warehouse forms would likely not be able to be constructed under the current height district regulations.

Section 6-404: Additional regulations for the Potomac River Vicinity Height District.

....

(B)(3) In addition to the provisions of section 11-504 [special use permit standards], the following standards and guidelines, to the extent relevant in each individual case, shall apply in considering an application for a special use permit for additional building height:

(a) The degree to which imaginative and creative architectural solutions advance recreational access to and enjoyment of the historic waterfront from public streets and other public areas. Buildings should be in harmony with existing buildings of genuine architectural merit, to be found in the historic district.

The proposed design reflects the scale, massing and architectural character of traditional 19th-century waterfront warehouses. Waterfront access and visibility will be increased with the addition of two public through-block connections from South Union Street to The Strand. The proposed scheme anticipates a new park immediately east of the site across The Strand and will further goals for recreational access to the water. It is anticipated that The Strand will evolve to a pedestrian-only street and therefore the hotel will open onto an active walk way and park.

(b) The degree to which the basic 30 feet height is maintained at the street faces and the waterfront face of the proposed building or buildings. To provide a

transition, building heights over this basic height level should be set back from the street faces and waterfront faces.

The proposed design is five stories tall overall with setbacks at the third and fourth floors, depending on the alternative. Staff does not believe that the initially proposed South Union Street elevation complies with the setback requirement, -- a belt course is not enough of a transition above 30' to comply with the standard - - though the massing of the top two floors of Alternate 1 of the west elevation is similar to the proposed east elevation and is set back for approximate 60% of the façade. The BAR may determine that this amount is adequate in this context.

(c) The degree to which the height, mass and bulk of the proposed construction are compatible with and reflect the traditional height, mass, and bulk of buildings and structures displayed within the streetscapes of the historic district.

The architectural forms of traditional 19th-century architecture are discussed in the Waterfront Context section above. Commercial and functional requirements dictated that historic waterfront warehouses had significantly greater height, mass and bulk than other building types. The proposed scheme employs just such traditional height, massing and bulk as well as roof form. Historic photographs of this area of the waterfront depict 19th-century waterfront buildings similar to what is proposed with respect to height, scale, massing and general architectural character.

(d) The degree to which imaginative and creative architectural solutions enhance views and vistas from public streets and other public-access areas along the historic waterfront. The waterfront faces of the buildings, in particular, should be designed and integrated so as to enhance pedestrian enjoyment of the waterfront, and the quality and character of the historic waterfront, as a totality, when viewed from passing vessels.

Historic photographs illustrate a series of prominent warehouse buildings oriented to the river. The applicant proposes for The Strand elevation to have a similar prominent elevation with punched fenestration. Whether from the park or the river, this building will appear to be in scale with other waterfront buildings and will not overwhelm nor detract from nearby buildings of historic merit.

(e) The degree to which the use or uses of the proposed building or buildings are compatible with historical waterfront-related uses in the City of Alexandria.

The BAR does not review or comment upon use.

6. Development Goals and Guidelines for Cummings/Turner Block in Alexandria Waterfront Small Area Plan

While the Board generally bases its analysis and decision-making on the Zoning Ordinance, approved *Design Guidelines* and adopted policies, it is appropriate in this case that the Board also consider the general architectural recommendations and guidelines outlined for this particular block in the Alexandria Waterfront Small Area Plan. The DSUP application and related staff report will fully examine compliance with the approved small area plan. However, the Board should understand and comment on how this project complies with larger planning initiatives, and especially with the development goals and guidelines for each development site within the Waterfront Small Area Plan. The block on which the subject project is located is referred to as the Cummings/Turner Block.

Development Goals for the Cummings/Turner Block

The goals for this block include a mix of uses and designs that are inviting to the public and promote activity. Included in this goal is the objective to provide public amenities, including the creation of new east-west alleys and the inclusion of interpretive features. New construction should maintain a compatible building scale while maximizing water views. The goal for this block is to “employ a land use mix and design which invites the public and encourages activity within the proposed development and in the adjacent public spaces.” The proposed design will accomplish these goals, particularly since the design will activate two mid-block alleys as well as street frontages.

In general, the proposed scheme is consistent with the development goals for this block. The existing commercial building does not relate to the waterfront. While no historical interpretive elements have been proposed as part of the concept submission, Staff encourages the applicant to incorporate such elements into the proposed scheme so that the new construction will have a direct link to the history of this block which is referenced in the Waterfront Small Area Plan and the History Plan as the Working Seaport Cultural Theme area because of its strong maritime-related past.

Development Guidelines for the Cummings/Turner Block

The Development Guidelines encourage active uses which are welcoming to the public. The proposed building, with first floor retail and outdoor seating on the adjacent alleyways, is consistent with these guidelines. It is also recommended that the streetscape and pedestrian experience be welcoming. The proposed scheme, with increased porosity from the new alleys, ground-floor activity, and other site improvements, will result in an enhanced street-level experience and greater feeling of openness. The guidelines also note that “historic interpretation, consistent with the recommendations of the History Plan, should inform every aspect of the design of the redevelopment and adjacent public spaces,” including “modern design inspired by historic precedent.” The guidelines incorporate public art and public amenities as part of redevelopment of this block.

Alexandria Waterfront Small Area Plan Conceptual Model

As part of the review and approval for the small area plan, a conceptual model was created that showed existing and proposed waterfront conditions to illustrate the plan as implemented. When the Board reviewed the Alexandria Waterfront Small Area Plan and the model as an information item at its February 2, 2011 hearing, it commented that it was generally in support of development consistent with the model. Council’s approval of the small area plan included a policy that future development proposals possess architecture and site design reflective of the important design

principles displayed in the scale model. Specifically, the design principles identified as important included: “alleys as view corridors; design elements that minimize the impacts of height, such as setbacks above the third story along Union Street and incorporation of the top story within a roof form; and small footprint buildings instead of larger ‘superblock’ development.”

IV. STAFF RECOMMENDATION

Staff believes that the scale, mass, height and architectural character of the proposed project is generally appropriate for this site and recommends that the applicant continue to revise and refine the design with special attention to the following:

1. Minimize the presence of a garage entrance on South Union Street and enhance the retail facades on both street elevations.
2. Clearly show transition setbacks at thirty feet on the two street-facing elevations.
3. The first floor north elevation presents key opportunities to include historic interpretation or public art and this approach should be integrated early in the design process.
4. Provide more developed schematic plans for the third floor addition at 205 The Strand showing all elevations in context.

Next Steps

Pending the BAR’s comments at the September 7, 2016 work session, it is anticipated that a Permit to Demolish and a second concept review should be scheduled as soon as the applicant is prepared. It is possible that the DSUP could be heard by Planning Commission and City Council in spring or summer of 2017. The applicant should continue to work with staff as plans are refined to ensure conformance with the zoning requirements and to make architectural revisions based on the Board’s comments at the work session.

STAFF

Catherine K. Miliaras, Historic Preservation Planner, Planning & Zoning
Al Cox, FAIA, Historic Preservation Manager, Planning & Zoning

V. CITY DEPARTMENT COMMENTS

Legend: C - code requirement R - recommendation S - suggestion F- finding

Zoning

The subject property consists of three parcels along Strand Street. The applicant is proposing to redevelop and renovate the existing buildings in the W-1 zone. The plan proposes to redevelop the existing 211 Strand Street building from single-story retail to a 5-story building with retail on the ground floor and residential units above. The plan also proposes to add a third floor to the existing retail building located at 205 Strand Street. The applicant has submitted a conceptual review to BAR. The following are findings for the applicant to consider should they move

forward with a site plan. The parcels are located in the Central Business District and the parcels are not adjacent to the Potomac River.

- F-1 Applicant must demonstrate that there is less than 10,000 square feet of retail on the ground floor for the use to be considered permitted by-right. Any more than this, the retail will require a special use permit.
- F-2 Although these parcels are located in the CBD, the lots as combined are over 10,000 square feet, so all uses will need to provide parking.
- F-3 The applicant will need to provide at least 300 square feet per dwelling unit.
- F-4 The “retail display” along S Union Street may be considered a sign depending on the final layout.
- F-5 The current height maximum is 30 feet from the average finished grade. The increased can be requested through a special use permit subject to the criteria of 6-404.
- F-6 Average finished grade must be provided to determine overall building height.
- F-7 Penthouse mechanical can only be 15 feet in height.
- F-8 If any parapet walls are over 3.5 feet in height, the entire parapet wall will count towards overall building height.
- F-9 Floor area under balconies will count towards net FAR.
- F-10 Retail is a permitted use on the ground floor in the W-1 zone.
- F-11 Multifamily residential is a permitted use on an upper floor in the W-1 zone.
- F-12 The parcel is not adjacent to the Potomac River, so the requirement for an additional access walkway to the water may not be required to comply with zoning.
- F-13 Proposed aisle width for 90 degree parking must be at least 22 feet.
- F-14 Proposed standard parking spaces must be at least 18.5 feet by 9 feet.
- F-15 Proposed compact parking spaces must be at least 16 feet by 6 feet.
- F-16 Determination will need to be made concerning setbacks for the multifamily residential portion. The W-1 does call out multifamily buildings as requiring two side yard setbacks, however, Zoning staff must determine if the portion of multifamily requires a setback or if the entire building can be deemed mixed use and no setbacks would be required.

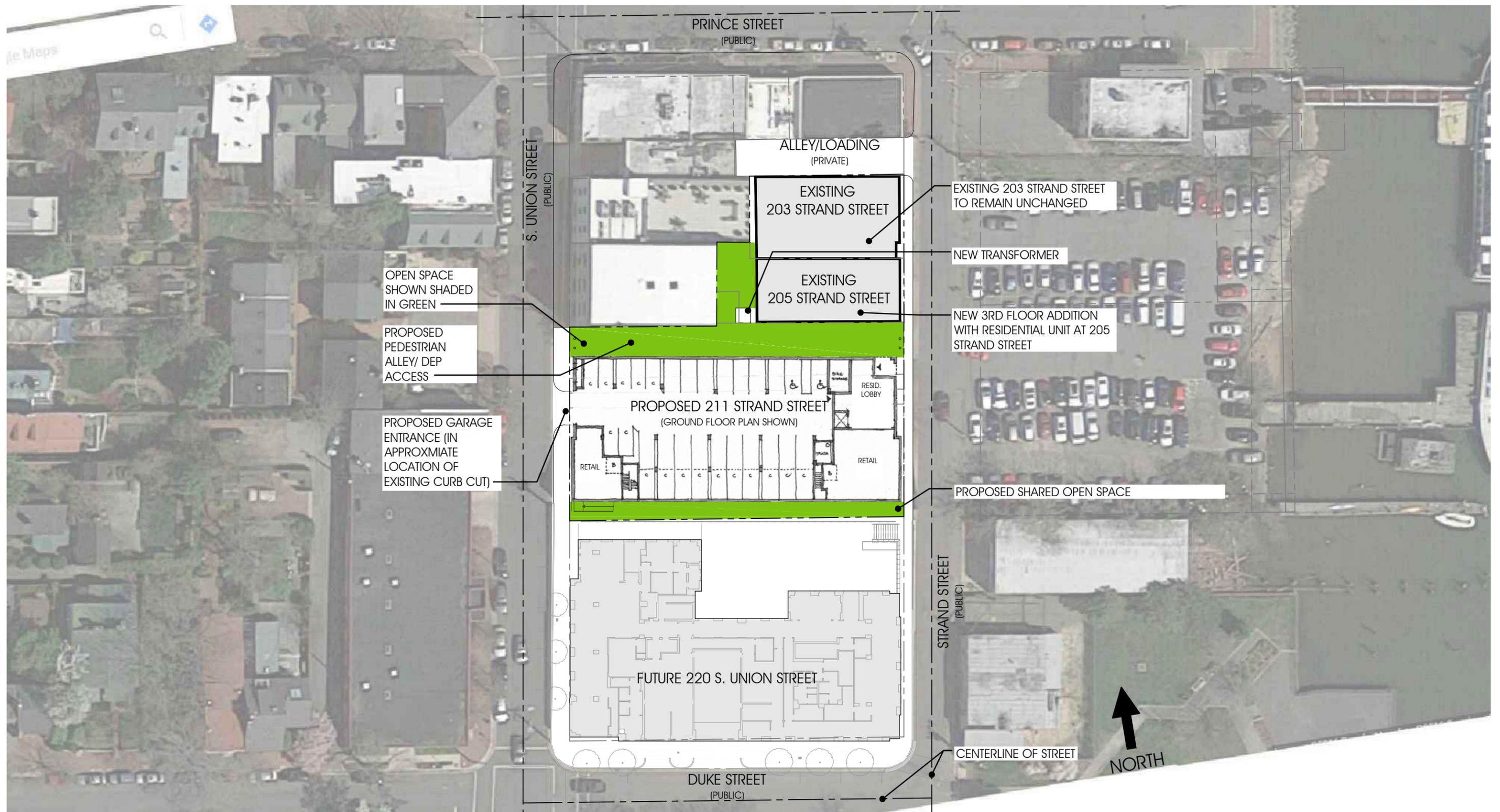
T&ES

- R-1 Comply with all requirements of [DSP2016-00003](T&ES)
- R-2 The Final Site Plan must be approved and released and a copy of that plan must be attached to the demolition permit application. No demolition permit will be issued in advance of the building permit unless the Final Site Plan includes a demolition plan which clearly represents the demolished condition. (T&ES)

V. ATTACHMENTS

1 – Submission materials

2-- Application for BAR2016-00268: 203, 205, 211 Strand

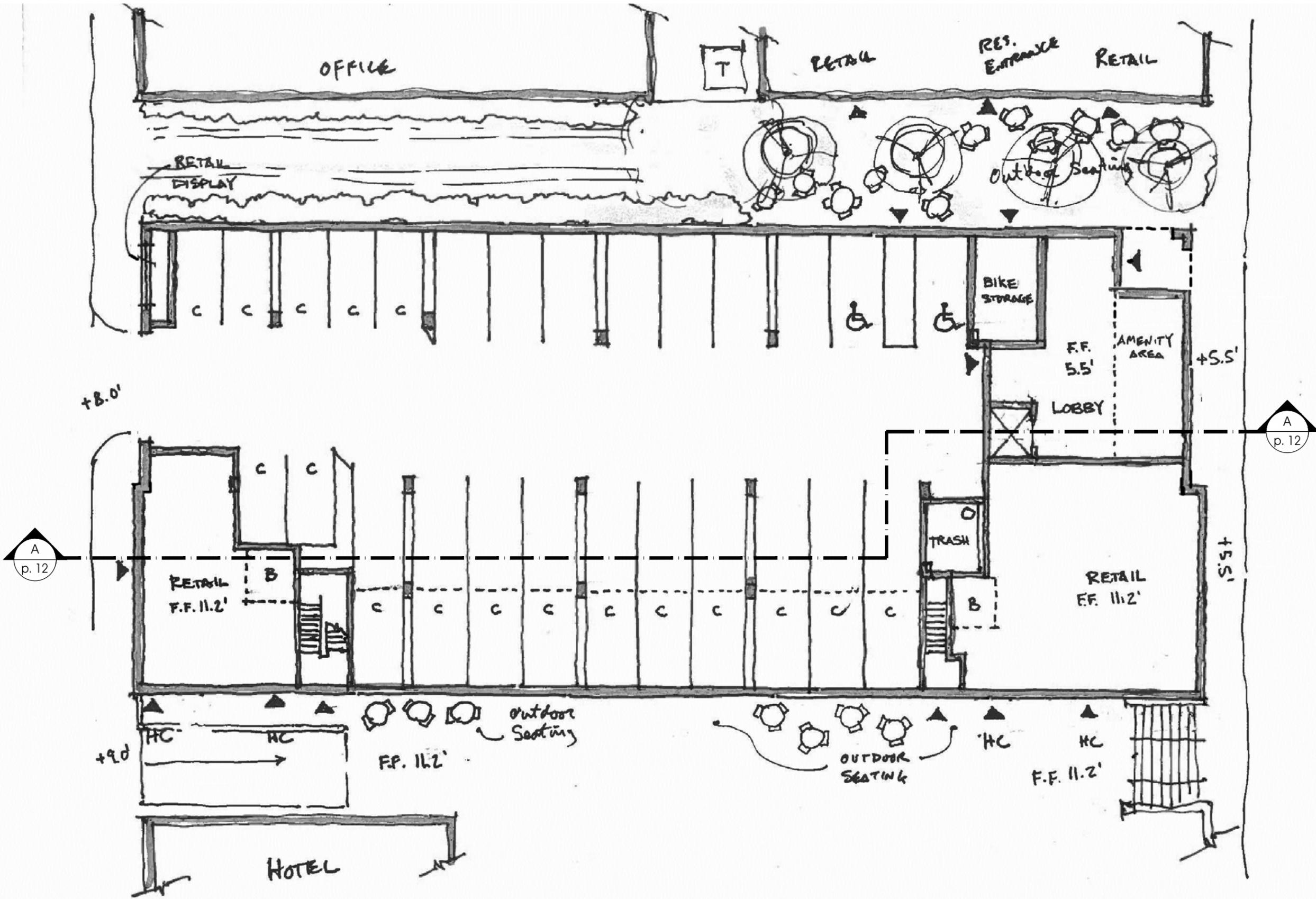


08.08.16 Applications & Materials
 Page 3 BAR2016-00268
 203/205/211 Strand St
 8/8/2016

PROPOSED SITE PLAN
 203, 205 & 211 Strand Street
 16002

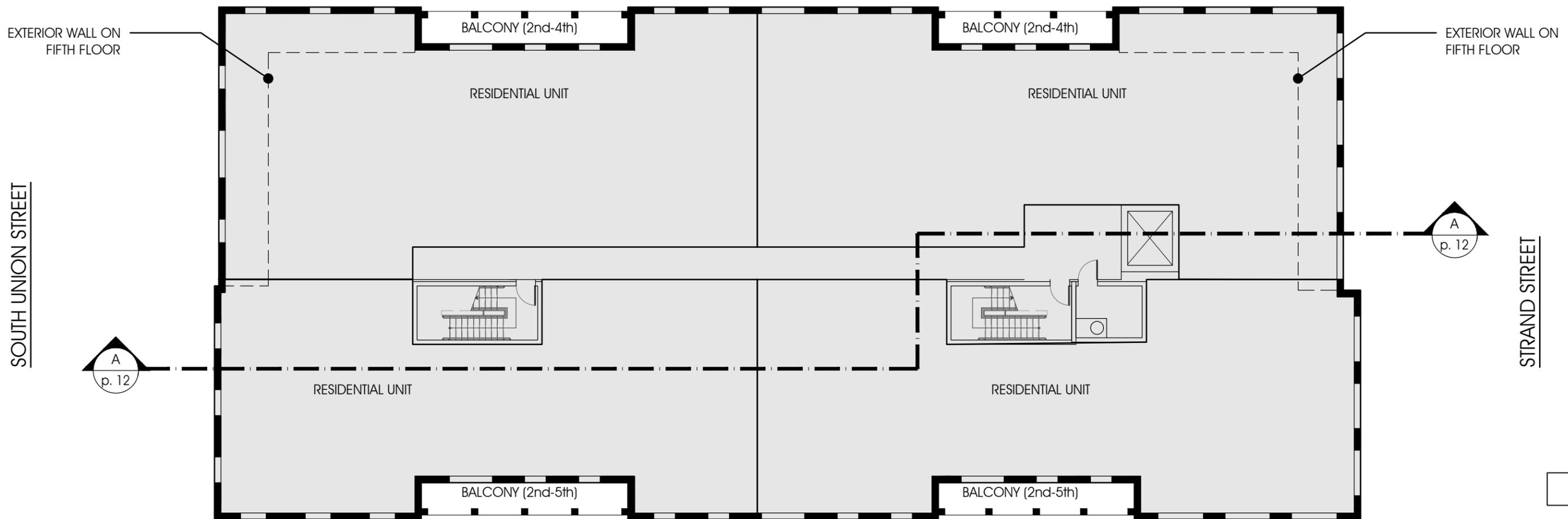
SCALE: 1"=50'

SOUTH UNION STREET

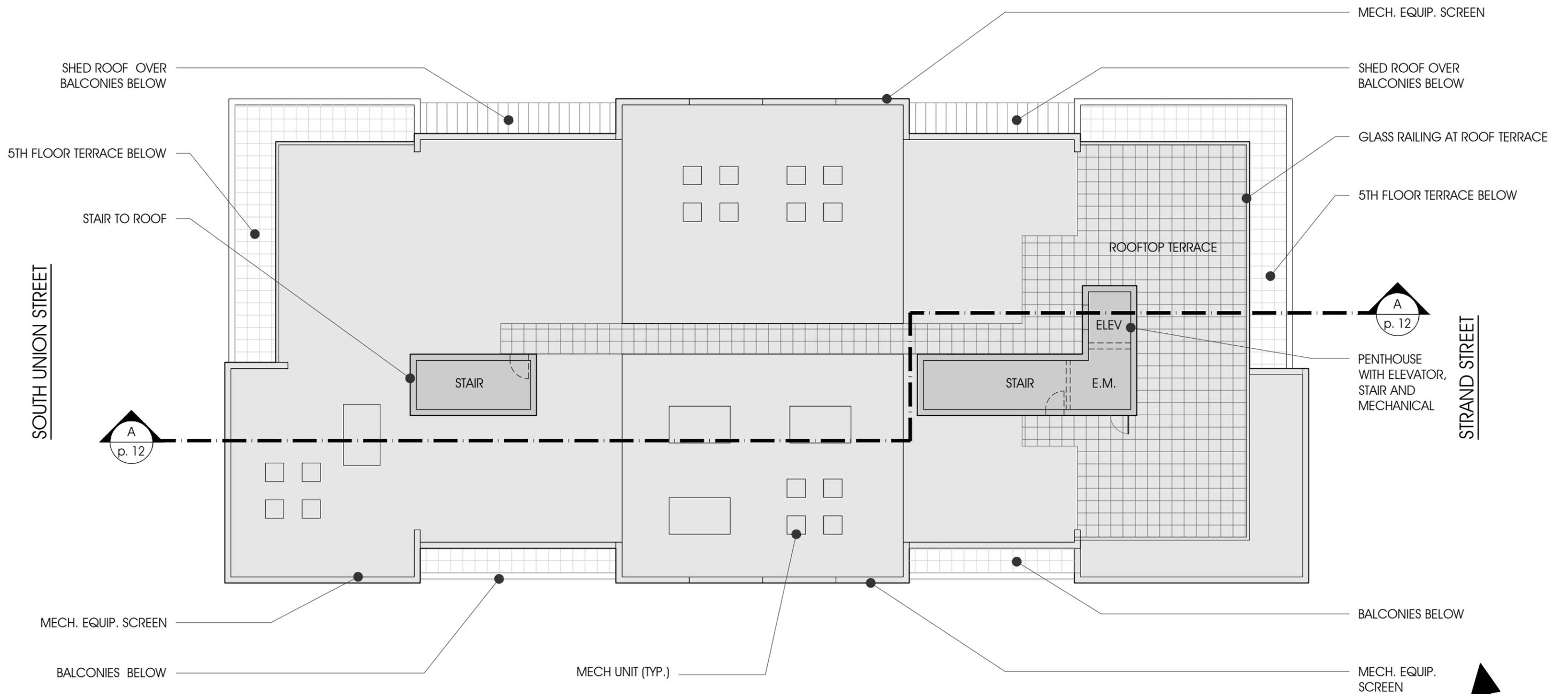


STRAND STREET



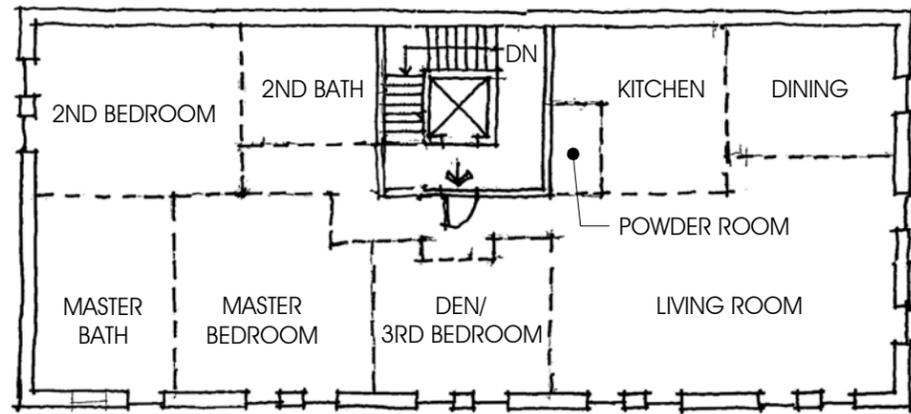


Applications & Materials
 BAR2016-00268
 203/205/211 Strand St
 8/8/2016

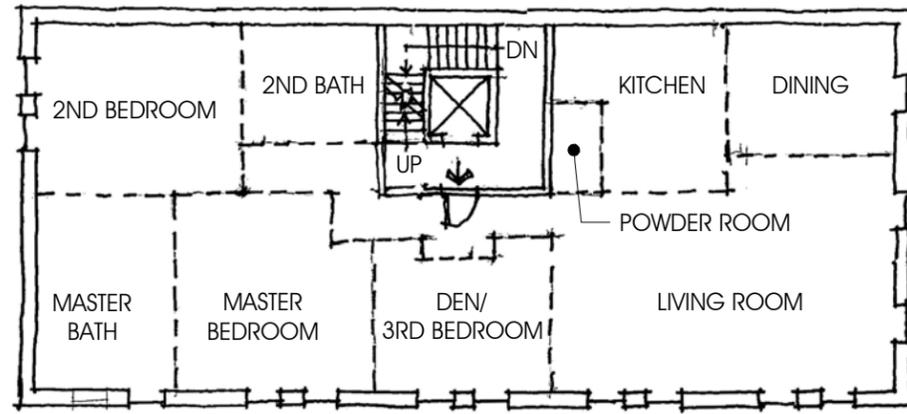


Applications & Materials
 BAR2016-00268
 203/205/211 Strand St
 8/8/2016

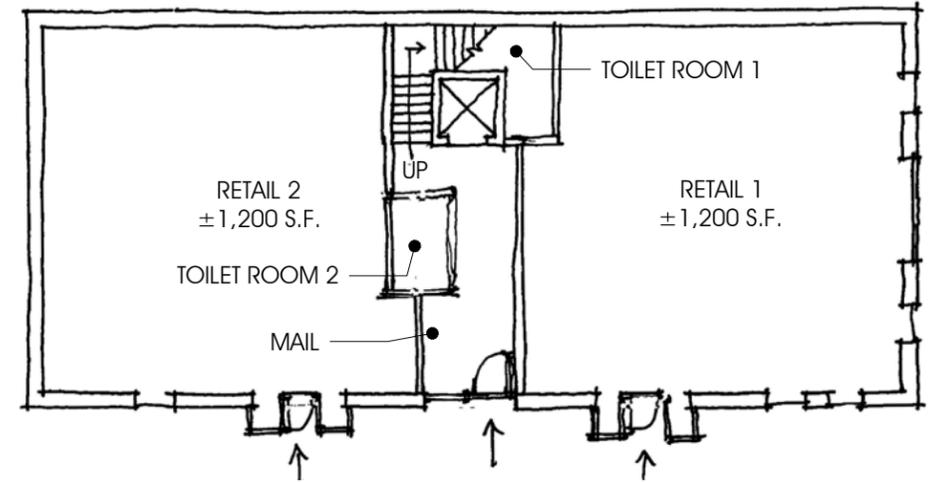
211 STRAND - PROPOSED ROOF PLAN
 203, 205 & 211 Strand Street
 16002



PROPOSED THIRD FLOOR ADDITION



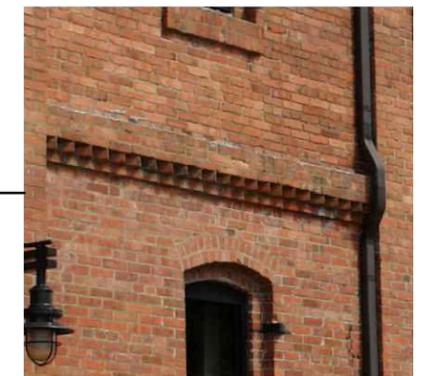
EXISTING SECOND FLOOR MODIFICATIONS



EXISTING GROUND FLOOR MODIFICATIONS

Applications & Materials
 BAR2016-00268
 203/205/211 Strand St
 8/8/2016





B PROPOSED BUILDING EAST (STRAND STREET) ELEVATION
1/16" = 1'-0"

A PROPOSED BUILDING WEST (S. UNION STREET) ELEVATION
1/16" = 1'-0"

08.08.16 Applications & Materials
Page 8 BAR2016-00268
203/205/211 Strand St
8/8/2016

211 STRAND - PROPOSED EAST & WEST ELEVATIONS
203, 205 & 211 Strand Street
16002

SCALE: 1/16" = 1'-0"

RUST | ORLING
ARCHITECTURE



ALTERNATE 1



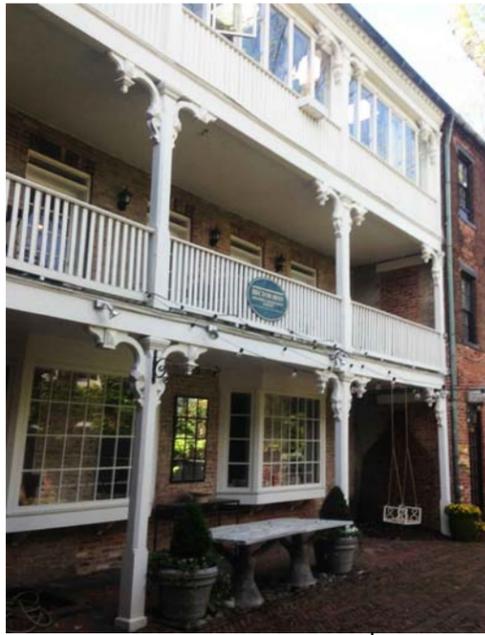
ALTERNATE 2

Applications & Materials
 BAR2016-00268
 203/205/211 Strand St
 8/8/2016



ALTERNATE 1

Applications & Materials
BAR2016-00268
203/205/211 Strand St
8/8/2016



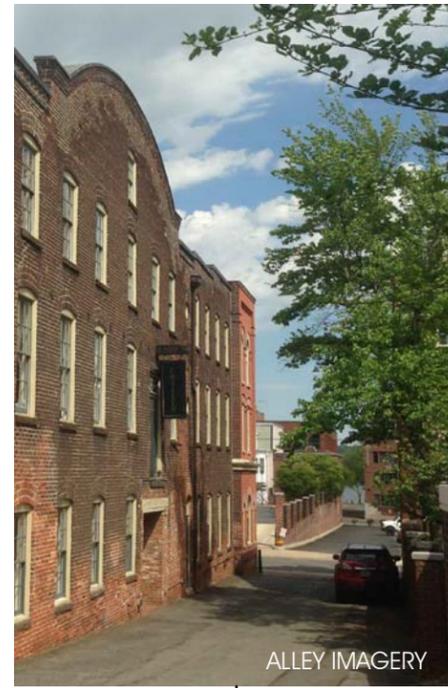
Applications & Materials
 BAR2016-00268
 203/205/211 Strand St
 8/8/2016

08.08.16
 Page 9

211 STRAND - PROPOSED SOUTH ELEVATION
 203, 205 & 211 Strand Street
 16002

SCALE: 1/16" = 1'-0"

RUST | ORLING
 ARCHITECTURE

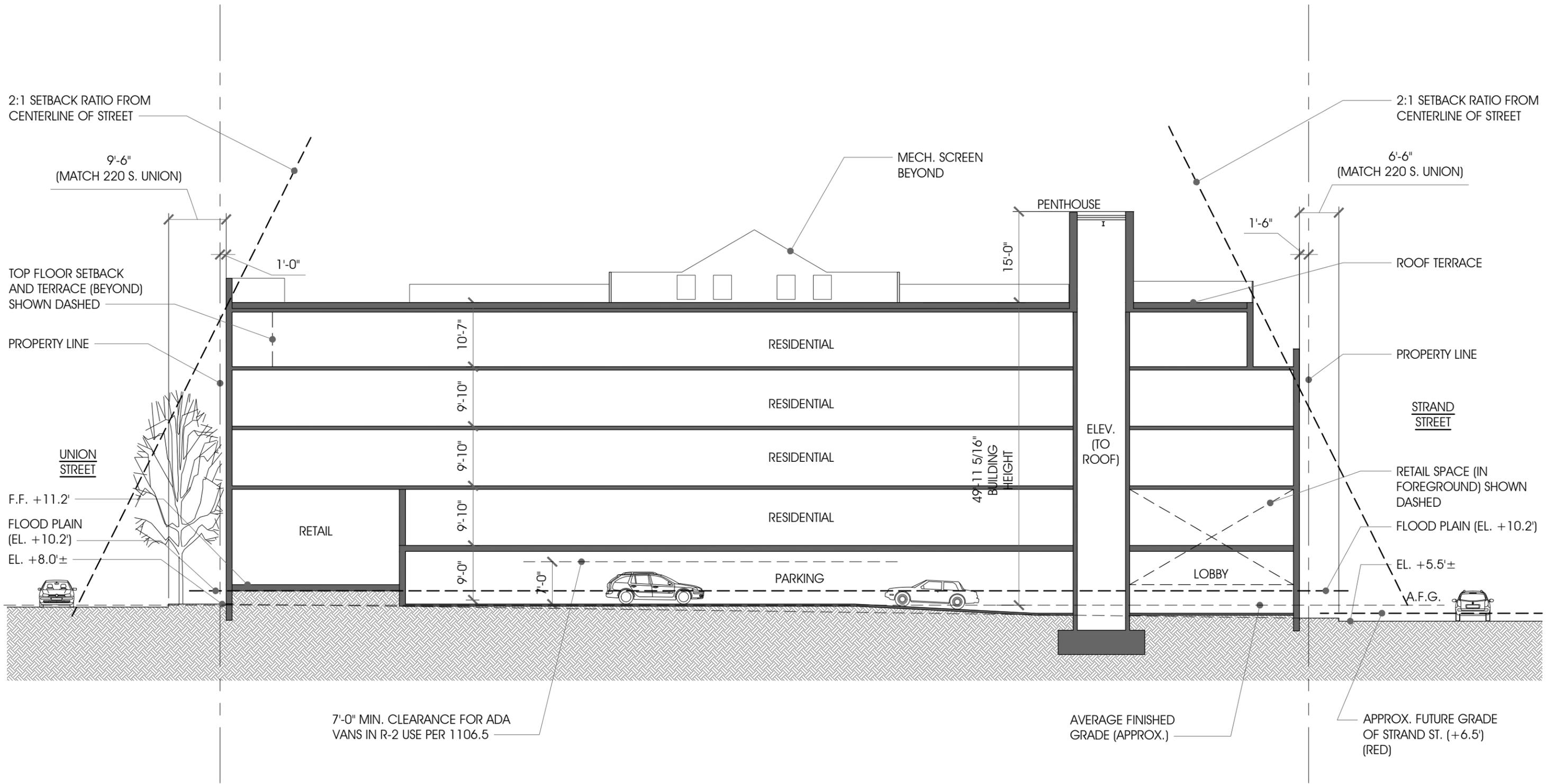




SOUTH UNION STREET STREETScape



STRAND STREET STREETScape



08.08.16 Applications & Materials
 Page 12 BAR2016-00268
 203/205/211 Strand St
 8/8/2016

211 STRAND - BUILDING SECTION
 203, 205 & 211 Strand Street
 16002

SCALE: 1"=50'-0"





08.08.16 Applications & Materials
Page 13 BAR2016-00268
203/205/211 Strand St
8/8/2016

AERIAL VIEW
203, 205 & 211 Strand Street
16002

N.T.S.

RUST | ORLING
ARCHITECTURE

PRELIMINARY FLOOR AREA RATIO AND OPEN SPACE CALCULATIONS

A. Property Information

A1. Street Address 203/205/211 Strand Street Zone W-1

A2.
$$\frac{26,944}{\text{Total Lot Area}} \times \frac{3.0}{\text{Floor Area Ratio Allowed by Zone}} = \frac{80,832}{\text{Maximum Allowable Floor Area}}$$

B. Existing Gross Floor Area

Existing Gross Area*		Allowable Exclusions (Estimated)	
Basement		Basement**	
First Floor	11,401	Stairways**	346
Second Floor	5,889	Mechanical**	519
Third Floor		Other**	
Porches/Other		Total Exclusions	865
Total Gross*	17,290		

B1. Existing Gross Floor Area *
17,290 Sq. Ft.
B2. Allowable Floor Exclusions**
865 Sq. Ft.
B3. Existing Floor Area minus Exclusions
16,426 Sq. Ft.
(subtract B2 from B1)

C. Proposed Gross Floor Area (does not include existing area)

Proposed Gross Area*		Allowable Exclusions (Estimated)	
Basement		Basement**	
First Floor	8,489	Stairways**	1,246
Second Floor	11,314	Mechanical**	1,869
Third Floor	16,510	Other**	1,869
Fourth Floor	13,782	Total Exclusions	4,983
Fifth Floor	12,193		
Porches/Other			
Total Gross*	62,288		

C1. Proposed Gross Floor Area *
62,288 Sq. Ft.
C2. Proposed Floor Exclusions**
4,983 Sq. Ft.
C3. Proposed Floor Area minus Exclusions
57,305 Sq. Ft.
(subtract C2 from C1)

D. Existing + Proposed Floor Area

D1. Total Floor Area (add B3 and C3) 73,730 Sq. Ft.
D2. Total Floor Area Allowed by Zone (A2) 80,832 Sq. Ft.

E. Open Space Calculations

Existing Open Space	4,085	
Required Open Space	5,400	(300 Sq. Ft. per Unit)
Proposed Open Space	5,400	

*Gross floor area is the sum of all gross horizontal areas under roof, measured from the face of exterior walls, including basements, garages, sheds, gazebos, guest buildings and other accessory buildings.
** Refer to the zoning ordinance (Section 2-145(B)) and consult with zoning staff for information regarding allowable exclusions.
If taking exclusions other than basements, floor plans with excluded areas must be submitted for review. Sections may also be required for some exclusions.

Applications & Materials
BAR2016-00268
203/205/211 Strand St
8/8/2016

ADDRESS OF PROJECT: 203/205/211 Strand Street

TAX MAP AND PARCEL: 075.03-03-04.R. -05. -06. -07 ZONING: W-1

APPLICATION FOR: *(Please check all that apply)*

- CERTIFICATE OF APPROPRIATENESS "CONCEPT PLAN"
- PERMIT TO MOVE, REMOVE, ENCAPSULATE OR DEMOLISH
(Required if more than 25 square feet of a structure is to be demolished/impacted)
- WAIVER OF VISION CLEARANCE REQUIREMENT and/or YARD REQUIREMENTS IN A VISION CLEARANCE AREA (Section 7-802, Alexandria 1992 Zoning Ordinance)
- WAIVER OF ROOFTOP HVAC SCREENING REQUIREMENT
(Section 6-403(B)(3), Alexandria 1992 Zoning Ordinance)

Applicant: Property Owner Business *(Please provide business name & contact person)*

Name: IDI Strand, L.C.

Address: 1700 N. Moore St., Suite 2020

City: Arlington State: VA Zip: 22209

Phone: 703-558-7300 E-mail: ccecchi@idigroup.com

Authorized Agent *(if applicable)*: Attorney Architect _____

Name: John Rust, Rust Orling Architecture Phone: 703-836-3205

E-mail: jrust@rustorling.com

Legal Property Owner:

Name: Turner Beverly D Jr Et Al

Address: Attn Simpson Properties LTD PO Box 430

City: Alexandria State: VA Zip: 22313

Phone: _____ E-mail: _____

- Yes No Is there an historic preservation easement on this property?
- Yes No If yes, has the easement holder agreed to the proposed alterations?
- Yes No Is there a homeowner's association for this property?
- Yes No If yes, has the homeowner's association approved the proposed alterations?

If you answered yes to any of the above, please attach a copy of the letter approving the project.

Applications & Materials
BAR2016-00268
203/205/211 Strand St
8/8/2016

NATURE OF PROPOSED WORK: *Please check all that apply*

- NEW CONSTRUCTION
- EXTERIOR ALTERATION: *Please check all that apply.*
 - awning
 - fence, gate or garden wall
 - HVAC equipment
 - shutters
 - doors
 - windows
 - siding
 - shed
 - lighting
 - pergola/trellis
 - painting unpainted masonry
 - other _____
- ADDITION
- DEMOLITION/ENCAPSULATION
- SIGNAGE

DESCRIPTION OF PROPOSED WORK: *Please describe the proposed work in detail (Additional pages may be attached).*

The project consists of the construction of an approximately 62,000 gross square foot building with 16 residential units and ground floor retail at 211 Strand Street. At 205 Strand Street, a third floor will be added which, along with other internal modifications to the building, will add an additional two residential units. The building at 203 Strand Street will remain unchanged.

SUBMITTAL REQUIREMENTS:

Items listed below comprise the **minimum supporting materials** for BAR applications. Staff may request additional information during application review. Please refer to the relevant section of the *Design Guidelines* for further information on appropriate treatments.

Applicants must use the checklist below to ensure the application is complete. Include all information and material that are necessary to thoroughly describe the project. Incomplete applications will delay the docketing of the application for review. Pre-application meetings are required for all proposed additions. All applicants are encouraged to meet with staff prior to submission of a completed application.

Electronic copies of submission materials should be submitted whenever possible.

Demolition/Encapsulation : *All applicants requesting 25 square feet or more of demolition/encapsulation must complete this section. Check N/A if an item in this section does not apply to your project.*

- N/A
- Survey plat showing the extent of the proposed demolition/encapsulation.
- Existing elevation drawings clearly showing all elements proposed for demolition/encapsulation.
- Clear and labeled photographs of all elevations of the building if the entire structure is proposed to be demolished.
- Description of the reason for demolition/encapsulation.
- Description of the alternatives to demolition/encapsulation and why such alternatives are not considered feasible.

Applications & Materials
BAR2016-00268
203/205/211 Strand St
8/8/2016

Additions & New Construction: Drawings must be to scale and should not exceed 11" x 17" unless approved by staff. All plans must be folded and collated into 3 complete 8 1/2" x 11" sets. Additional copies may be requested by staff for large-scale development projects or projects fronting Washington Street. Check N/A if an item in this section does not apply to your project.

- N/A
- Scaled survey plat showing dimensions of lot and location of existing building and other structures on the lot, location of proposed structure or addition, dimensions of existing structure(s), proposed addition or new construction, and all exterior, ground and roof mounted equipment.
 - FAR & Open Space calculation form.
 - Clear and labeled photographs of the site, surrounding properties and existing structures, if applicable.
 - Existing elevations must be scaled and include dimensions.
 - Proposed elevations must be scaled and include dimensions. Include the relationship to adjacent structures in plan and elevations.
 - Materials and colors to be used must be specified and delineated on the drawings. Actual samples may be provided or required.
 - Manufacturer's specifications for materials to include, but not limited to: roofing, siding, windows, doors, lighting, fencing, HVAC equipment and walls.
 - For development site plan projects, a model showing mass relationships to adjacent properties and structures.

Signs & Awnings: One sign per building under one square foot does not require BAR approval unless illuminated. All other signs including window signs require BAR approval. Check N/A if an item in this section does not apply to your project.

- N/A
- Linear feet of building: Front: _____ Secondary front (if corner lot): _____
 - Square feet of existing signs to remain: _____
 - Photograph of building showing existing conditions.
 - Dimensioned drawings of proposed sign identifying materials, color, lettering style and text.
 - Location of sign (show exact location on building including the height above sidewalk).
 - Means of attachment (drawing or manufacturer's cut sheet of bracket if applicable).
 - Description of lighting (if applicable). Include manufacturer's cut sheet for any new lighting fixtures and information detailing how it will be attached to the building's facade.

Alterations: Check N/A if an item in this section does not apply to your project.

- N/A
- Clear and labeled photographs of the site, especially the area being impacted by the alterations, all sides of the building and any pertinent details.
 - Manufacturer's specifications for materials to include, but not limited to: roofing, siding, windows, doors, lighting, fencing, HVAC equipment and walls.
 - Drawings accurately representing the changes to the proposed structure, including materials and overall dimensions. Drawings must be to scale.
 - An official survey plat showing the proposed locations of HVAC units, fences, and sheds.
 - Historic elevations or photographs should accompany any request to return a structure to an earlier appearance.

ALL APPLICATIONS: *Please read and check that you have read and understand the following items:*

- I have submitted a filing fee with this application. (Checks should be made payable to the City of Alexandria. Please contact staff for assistance in determining the appropriate fee.)
- I understand the notice requirements and will return a copy of the three respective notice forms to BAR staff at least five days prior to the hearing. If I am unsure to whom I should send notice I will contact Planning and Zoning staff for assistance in identifying adjacent parcels.
- I, the applicant, or an authorized representative will be present at the public hearing.
- I understand that any revisions to this initial application submission (including applications deferred for restudy) must be accompanied by the BAR Supplemental form and 3 sets of revised materials.

The undersigned hereby attests that all of the information herein provided including the site plan, building elevations, prospective drawings of the project, and written descriptive information are true, correct and accurate. The undersigned further understands that, should such information be found incorrect, any action taken by the Board based on such information may be invalidated. The undersigned also hereby grants the City of Alexandria permission to post placard notice as required by Article XI, Division A, Section 11-301(B) of the 1992 Alexandria City Zoning Ordinance, on the property which is the subject of this application. The undersigned also hereby authorizes the City staff and members of the BAR to inspect this site as necessary in the course of research and evaluating the application. The applicant, if other than the property owner, also attests that he/she has obtained permission from the property owner to make this application.

APPLICANT OR AUTHORIZED AGENT:

Signature: 

Printed Name: JOHN RUST

Date: August 5, 2016

Applications & Materials
BAR2016-00268
203/205/211 Strand St
8/8/2016

OWNERSHIP AND DISCLOSURE STATEMENT

Use additional sheets if necessary

1. Applicant. State the name, address and percent of ownership of any person or entity owning an interest in the applicant, unless the entity is a corporation or partnership, in which case identify each owner of more than ten percent. The term ownership interest shall include any legal or equitable interest held at the time of the application in the real property which is the subject of the application.

Name	Address	Percent of Ownership
1. IDI VIRGINIA HOLDINGS, L.C.	1700 N. MOORE ST. SUITE 2020	100%
2.	ARLINGTON, VA 22209	
3.		

2. Property. State the name, address and percent of ownership of any person or entity owning an interest in the property located at 203/205/211 STRAND ST. (address), unless the entity is a corporation or partnership, in which case identify each owner of more than ten percent. The term ownership interest shall include any legal or equitable interest held at the time of the application in the real property which is the subject of the application.

Name	Address	Percent of Ownership
1. BEVERLY D. TURNER, JR.	19450 GULF BLVD. #602 INDIAN SHORES, FL 33785	33.3%
2. JAMES A. TURNER	8015 MONTOUR HEIGHTS DR. GAINESVILLE, VA 20155	33.3%
3. JOHN DAVID WHITESTONE	1110 ALDEN RD. ALEXANDRIA, VA 22308	16.7%
4. MATTHEW LINDSEY WHITESTONE	1110 ALDEN RD. ALEXANDRIA, VA 22308	16.7%

3. Business or Financial Relationships. Each person or entity listed above (1 and 2), with an ownership interest in the applicant or in the subject property is required to disclose any business or financial relationship, as defined by Section 11-350 of the Zoning Ordinance, existing at the time of this application, or within the 12-month period prior to the submission of this application with any member of the Alexandria City Council, Planning Commission, Board of Zoning Appeals or either Boards of Architectural Review.

Name of person or entity	Relationship as defined by Section 11-350 of the Zoning Ordinance	Member of the Approving Body (i.e. City Council, Planning Commission, etc.)
1. NONE	NONE	NONE
2.		
3.		

NOTE: Business or financial relationships of the type described in Sec. 11-350 that arise after the filing of this application and before each public hearing must be disclosed prior to the public hearings.

As the applicant or the applicant's authorized agent, I hereby attest to the best of my ability that the information provided above is true and correct.

8/4/2016 CARLOS CECCHI 

Date Printed Name Signature