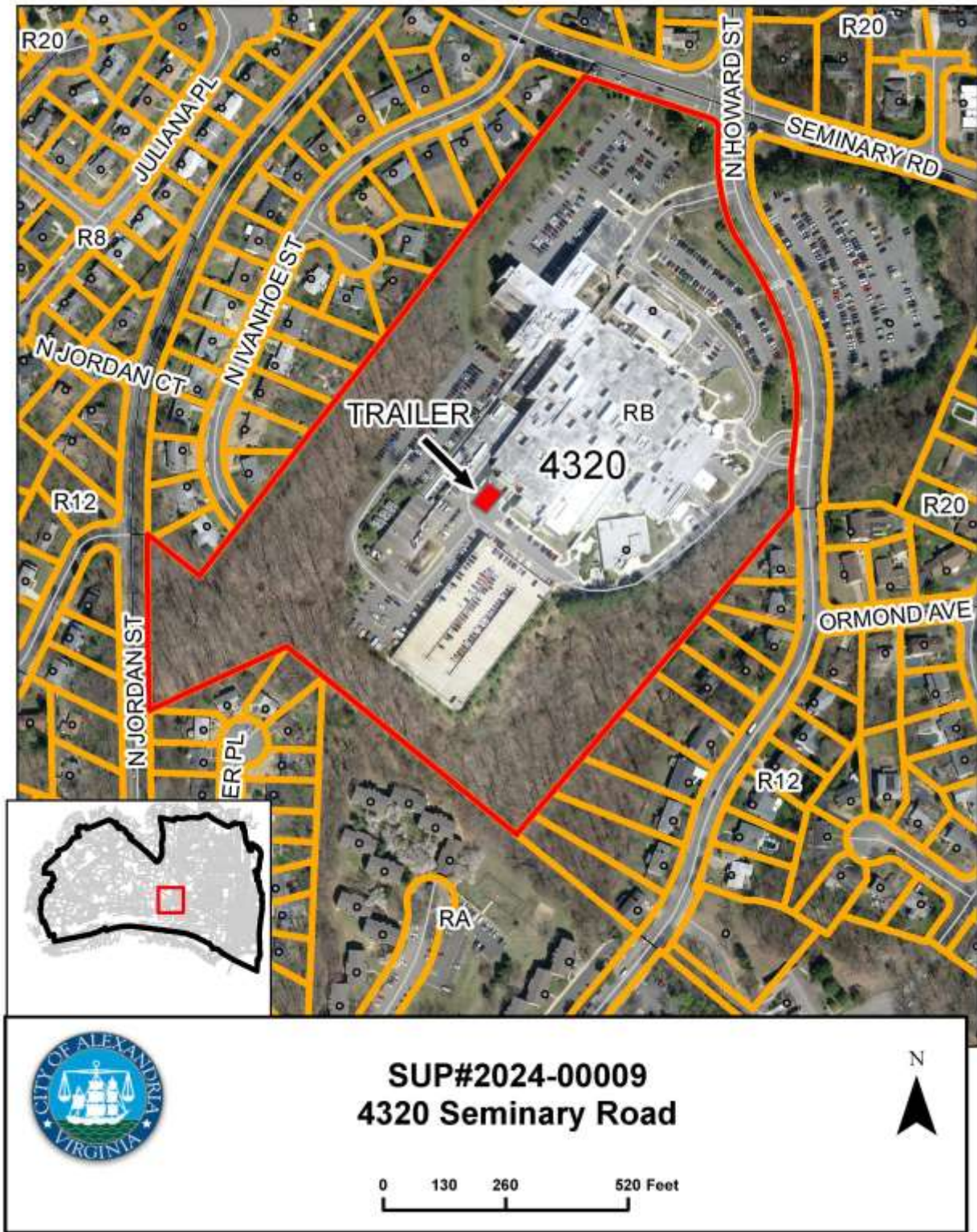




***Docket Item #6
 Special Use Permit #2024-00009
 4320 Seminary Road
 Temporary Trailer - Inova Health Care Services***

Application	General Data	
Public hearing and consideration of a Special Use Permit for a temporary trailer	Planning Commission Hearing:	May 7, 2024
	City Council Hearing:	May 18, 2024
Address: 4320 Seminary Road	Zone:	RB/Townhouse
Applicant: Inova Health Care Services, represented by M. Catharine Puskar, attorney	Small Area Plan:	Seminary Hill / Strawberry Hill
Staff Recommendation: approval subject to compliance with all applicable codes and ordinances and the recommended permit conditions found in Section III of this report.		
Staff Reviewers: Mavis Stanfield, mavis.stanfield@alexandriava.gov		



I. DISCUSSION

The applicant, Inova Health Care Services, requests Special Use Permit approval to install a 903 square-foot temporary trailer for storage at the existing hospital site until the new hospital campus at the former Landmark Mall is constructed.

SITE DESCRIPTION

The hospital is located at the intersection of Seminary Road and Howard Street and is comprised of two parcels: a 27.6-acre site on the west side of Howard Street, and a 5.9-acre parcel on the east side of Howard Street. The smaller parcel is devoted entirely to parking and landscaping and is not included in this application. Improvements on the western parcel, the subject of this SUP, include the hospital, emergency room, a medical clinic, associated buildings with a parking structure, and surface parking lots. The southern and western portion of the site contains steep slopes and is primarily wooded. The hospital is generally surrounded by single-unit dwellings to the west, north, and east of the site, and multi-unit dwellings (Foxchase Apartments and Plaza Condominium) to the south.



Figure 1: Site context

BACKGROUND

The hospital has moved several times throughout its long history. As the Alexandria Infirmary in the late 19th Century, it first occupied a site at the corner of Duke Street and South Fairfax Street, moving several times to locations throughout Old Town. It changed its name to Alexandria Hospital in 1902 and then moved to the Corner of Duke Street and Washington Street. The current facility was built at the Seminary Road location and opened in 1962.

The hospital has been in operation at this site since the early 1960s and originally opened as a 150-bed facility. It expanded during the 1970s with an increase in capacity to 518 beds. During the 1970s, approvals were granted for a nursing center, a new public health center, parking lot extensions, and the construction of a permanent parking lot on the east side of Howard Street. This expansion nearly tripled the size of the facility with the construction of an addition on the southern portion of the original building.

In the 1980s, the hospital constructed a helipad, patient services center, cancer center, surgical center, and numerous other additions to the main facility. In the 1990s, changes to the hospital

included an expansion of the emergency department, construction of a new sign area, and enclosure of a connection bridge within the facility. In 1997, Alexandria Hospital and Inova Health System merged and the hospital adopted its current name of Inova Alexandria Hospital. The hospital and parking structure were further expanded in the early and mid-2000s.

Inova is now proposing to relocate, expand, and modernize its hospital facilities on the Landmark site. Following a rezoning of the existing hospital site and permitting and construction of a new hospital at Landmark, Inova anticipates the sale of the existing hospital property, and application for development permits and eventual demolition of the hospital (by the new owner/developer) between 2026 and 2028. According to the applicant, residential construction would not begin before 2028 or 2029.

On June 19, 2021, City Council approved a request by the applicant, Inova Health Care Services, to amend the zoning map and the Seminary Hill/Strawberry Hill Small Area Plan at 4250 Seminary Road and 4320 Seminary Road. The request for a zoning map amendment was to rezone the property from R-20/Residential and R-8/Residential with proffers to RB/Townhouse. The request for a master plan amendment included two changes in the small area plan: First, to change the land use category from INST Institutional to RM Residential Medium; second, to change the recommended heights in the small area plan from 35 feet for all buildings to 30 feet for single and two-unit dwellings and 45 feet for all other structures. The property would be redeveloped with single-unit dwellings and townhouses.

PROPOSAL

Due to increased demand for healthcare services in the surgical department at the hospital, Inova Alexandria Health Services is requesting a special use permit for a 903 square foot temporary trailer, composed of two shipping containers. Inova is in the process of retrofitting an existing operating room with upgraded equipment. The proposed trailer would enable Inova to continue its commitment to quality care for its patients by providing an upgraded operating room within the existing hospital while also providing space for storage of materials necessary for the hospital to function.

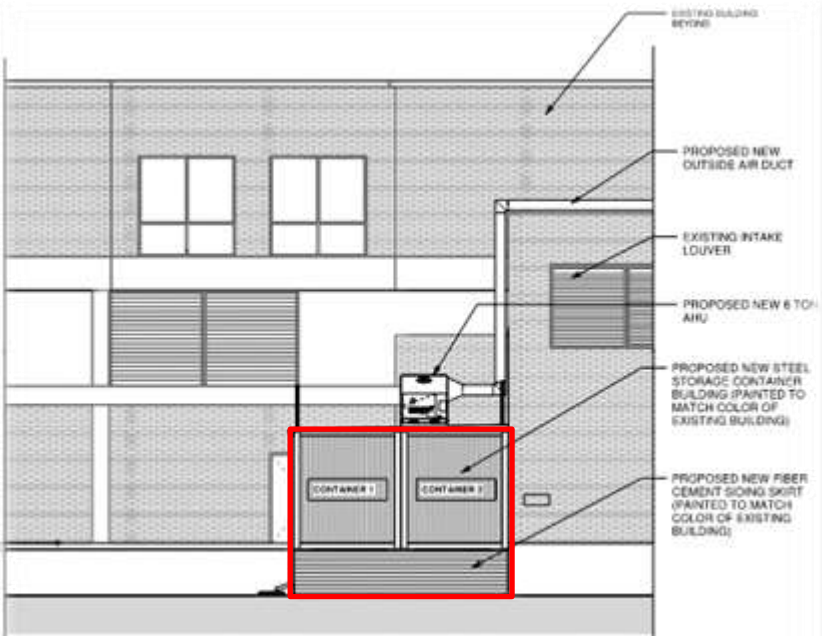


Figure 2: Temporary trailer outlined in red in front of the hospital west elevation

The proposed trailer would be located in the loading area at the rear of the hospital away from any neighboring properties. A window in the building that faces the loading area would be removed and replaced with a door allowing access to the storage area. The trailer would be painted to match the existing building and have fiber cement skirt that would also be painted to match the existing building.

The applicant requests that the proposed trailer would be in place until after the new Hospital Campus at Landmark Mall opens and the existing hospital at Seminary Road is decommissioned, which is currently anticipated to occur in 2028.

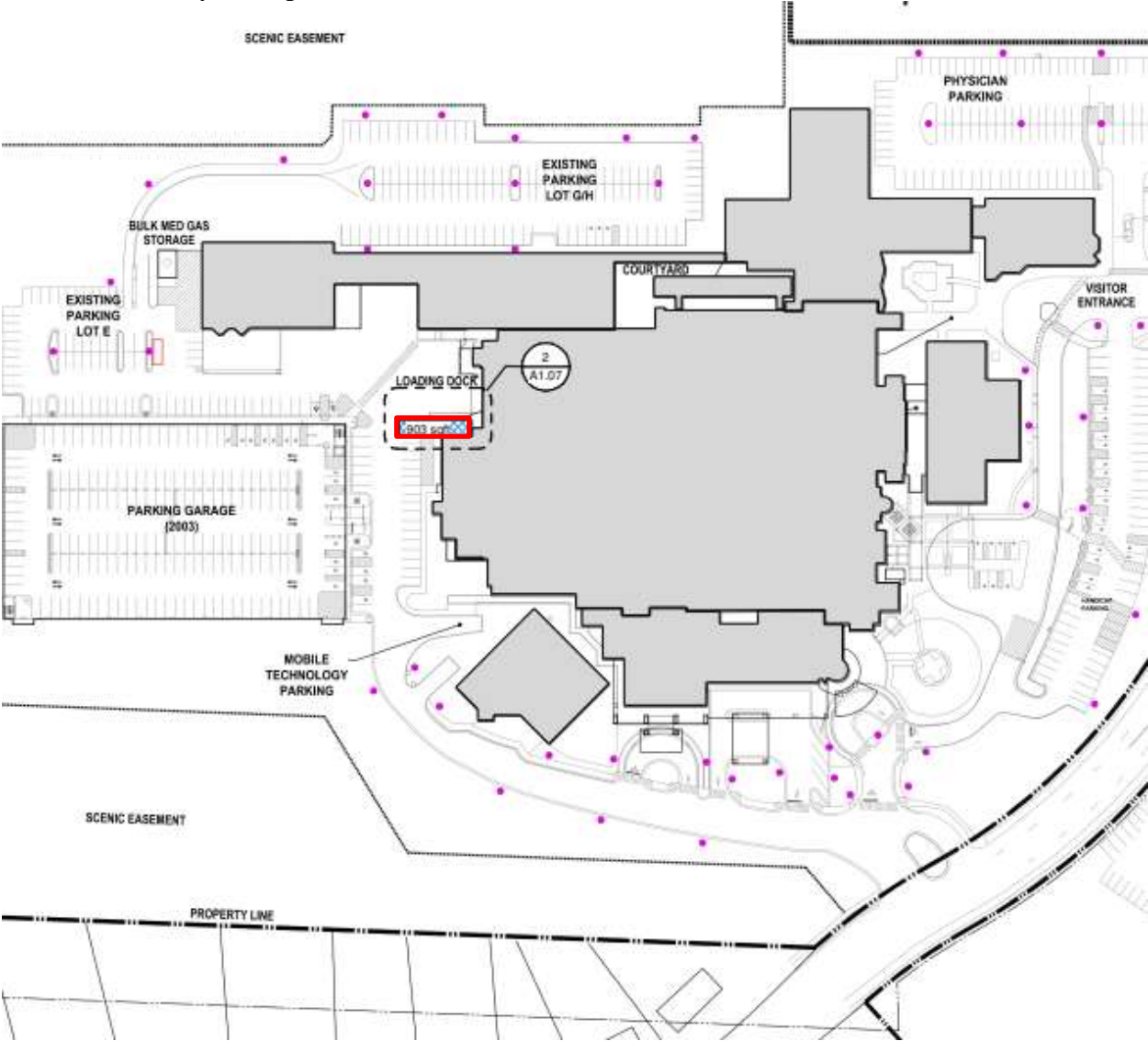


Figure 3: Site layout showing location of trailer outlined in red

PARKING

The most recent site plan for the property, DSUP #2005-00003, indicated that 576 spaces were required, and 1,528 spaces were provided. A condition of the DSUP associated with the site plan also stated that five loading spaces would be provided. Although the temporary trailer would be installed in one loading space, eight loading spaces would remain. Therefore, the parking requirement is met.

ZONING/MASTER PLAN DESIGNATION

The proposed use is located in the RB Zone. Section 7-1101(C) of the Zoning Ordinance allows temporary trailers for non-residential purposes with City Council approval of a Special Use Permit. A storage use is a permitted by right accessory use in the RB Townhouse zone pursuant to Section 3-702(D) and Section 7-101(F) allows for a storage structure.

Goals of the Seminary Hill / Strawberry Hill Small Area Plan are to preserve the primarily residential Seminary Hill/Strawberry Hill area and to protect its residential neighborhoods from incompatible intensive redevelopment of adjacent commercial or industrial parcels.

II. STAFF ANALYSIS

Staff supports the applicant's request to place a 903 square-foot temporary trailer in the loading dock area at the existing hospital. The location would not be near or visible to any residential uses and it would not generate noise. As the trailer use would be temporary, and a small fraction of additional square footage when compared with the overall hospital use, it would not impact the mid-term goals of the small area plan. The residential uses planned for the property after the hospital is decommissioned would be in harmony with the plan.

Given that the Zoning Ordinance allows trailers for business use only on a temporary basis, a condition with an expiration date is required. Given that the storage is vital to the hospital's operation until it is decommissioned, staff recommends the trailer remain until December 31, 2028, unless the existing hospital continues operation past that time as a result of unexpected construction delays. If delays occur, extension of the trailer may be approved through an administrative special use permit, as stated in Condition #3.

Subject to the conditions stated in Section III of this report, staff recommends approval of the Special Use Permit request.

III. RECOMMENDED CONDITIONS

Staff recommends approval subject to compliance with all applicable codes and ordinances and the following conditions:

1. The location and specifications of the temporary trailer shall be substantially consistent as proposed in the application dated February 12, 2024. (P&Z)

- 2. The temporary trailer shall be permitted until such time as the new hospital is operating or December 31, 2028, unless an administrative special use permit is granted to extend the timeframe if needed to maintain operations at the existing hospital due to an unforeseen delays with the construction of the new hospital. (P&Z)
- 3. Exterior power washing of the trailer shall not be completed using any kind of detergents. (T&ES)
- 4. Chemicals, detergents, or cleaners stored outside the building shall be kept in an enclosure with a roof. (T&ES)
- 5. The Director of Planning and Zoning shall review the Special Use Permit after it has been operational for one year, and shall docket the matter for consideration by the Planning Commission and City Council if (a) there have been documented violations of the permit conditions which were not corrected immediately, constitute repeat violations or which create a direct and immediate adverse zoning impact on the surrounding community; (b) the Director has received a request from any person to docket the permit for review as the result of a complaint that rises to the level of a violation of the permit conditions, or (c) the Director has determined that there are problems with the operation of the use and that new or revised conditions are needed. (P&Z)

STAFF: Tony LaColla, AICP, Division Chief, Land Use Services,
 Department of Planning and Zoning;
 Ann Horowitz, Principal Planner
 Mavis Stanfield, Urban Planner

Staff Note: In accordance with section 11-506(c) of the zoning ordinance, construction or operation shall be commenced and diligently and substantially pursued within 18 months of the date of granting of a special use permit by City Council or the special use permit shall become void.

IV. CITY DEPARTMENT COMMENTS

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

Transportation & Environmental Services:

- R-1 Exterior power washing of the trailer shall not be completed using any kind of detergents. (T&ES)
- R-2 Chemicals, detergents, or cleaners stored outside the building shall be kept in an enclosure with a roof. (T&ES)

- C-1: The applicant shall comply with the City of Alexandria's Noise Control Code, Title 11, Chapter 5, which sets the maximum permissible noise level as measured at the property line. (T&ES/OEQ)
- C-2. The applicant shall comply with the City of Alexandria's Solid Waste Control, Title 5, Chapter 1, which sets forth the requirements for the recycling of materials (Sec. 5-1-99). In order to comply with this code requirement, the applicant shall provide a completed Recycling Implementation Plan (RIP) Form within 60 days of SUP approval. Contact the City's Recycling Program Coordinator at (703) 746-4410, or via e-mail at commercialrecycling@alexandriava.gov, for information about completing this form. (T&ES/DROW)
- C-3 Section 5-1-42- Collection by Private collectors. (c) Time of collection. Solid waste shall be collected from all premises not serviced by the city at least once each week. No collections may be made between the hours of 11:00 p.m. and 7:00 a.m. (6:00 a.m. from May 1, through September 30) if the collection area is less than 500 feet from a residential area. (T&ES/DROW)

Code Enforcement:

- C-1 A permit is required for a change in use.

Fire:

- C-1 Having the temporary trailer attached to the hospital may require additional fire protection to be added.
- C-2 This new use may require a fire prevention permit. An application can be accessed online at: www.alexandriava.gov/fire-department/the-fire-marshals-office

Health:

No comments.

Recreation, Parks and Cultural Activities:

No comments received.

Police:

No comments received.



APPLICATION

SPECIAL USE PERMIT

SPECIAL USE PERMIT # _____

PROPERTY LOCATION: _____

TAX MAP REFERENCE: _____ **ZONE:** _____

APPLICANT:

Name: _____

Address: _____

PROPOSED USE: _____

THE UNDERSIGNED, hereby applies for a Special Use Permit in accordance with the provisions of Article XI, Section 4-11-500 of the 1992 Zoning Ordinance of the City of Alexandria, Virginia.

THE UNDERSIGNED, having obtained permission from the property owner, hereby grants permission to the City of Alexandria staff and Commission Members to visit, inspect, and photograph the building premises, land etc., connected with the application.

THE UNDERSIGNED, having obtained permission from the property owner, hereby grants permission to the City of Alexandria to post placard notice on the property for which this application is requested, pursuant to Article IV, Section 4-1404(D)(7) of the 1992 Zoning Ordinance of the City of Alexandria, Virginia.

THE UNDERSIGNED, hereby attests that all of the information herein provided and specifically including all surveys, drawings, etc., required to be furnished by the applicant are true, correct and accurate to the best of their knowledge and belief. The applicant is hereby notified that any written materials, drawings or illustrations submitted in support of this application and any specific oral representations made to the Director of Planning and Zoning on this application will be binding on the applicant unless those materials or representations are clearly stated to be non-binding or illustrative of general plans and intentions, subject to substantial revision, pursuant to Article XI, Section 11-207(A)(10), of the 1992 Zoning Ordinance of the City of Alexandria, Virginia.

Print Name of Applicant or Agent

Signature

Date

Mailing/Street Address

Telephone #

Fax #

City and State

Zip Code

Email address

PROPERTY OWNER'S AUTHORIZATION

As the property owner of _____, I hereby
(Property Address)
grant the applicant authorization to apply for the _____ use as
(use)
described in this application.

Name: _____ Phone _____

Please Print

Address: _____ Email: _____

Signature: _____ Date: _____

1. Floor Plan and Plot Plan. As a part of this application, the applicant is required to submit a floor plan and plot or site plan with the parking layout of the proposed use. The SUP application checklist lists the requirements of the floor and site plans. The Planning Director may waive requirements for plan submission upon receipt of a written request which adequately justifies a waiver.

Required floor plan and plot/site plan attached.

Requesting a waiver. See attached written request.

2. The applicant is the *(check one)*:

Owner

Contract Purchaser

Lessee or

Other: _____ of the subject property.

State the name, address and percent of ownership of any person or entity owning an interest in the applicant or owner, unless the entity is a corporation or partnership, in which case identify each owner of more than three percent.

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 three 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. Inova Health Care Services	8110 Gatehouse Road Falls Church, VA 22042	See attached
2.		
3.		

2. Property. State the name, address and percent of ownership of any person or entity owning an interest in the property located at _____ (address), unless the entity is a corporation or partnership, in which case identify each owner of more than three 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. Inova Health Care Services	8110 Gatehouse Road Falls Church, VA 22042	See attached
2.		
3.		

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. Inova Health Care Services	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.

February 27, 2024

M. Catharine Puskar

Date

Printed Name



Signature

Inova Health System Foundation is a non-stock, non-profit corporation.

Inova Health Care Services Agents:

J. Stephen Jones
Stephan Motew
Alice Pope
John F. Gaul H.
Thomas McDuffie
Johnny F. Weaver
Stacy Bell
Dominic J. Bonaiuto
Melissa Riddy

INOVA Health Care Services
C/O Inova Realty
8095 Innovation Park Drive, Building 7D
Fairfax, Virginia 22031

Karl Moritz
301 King Street
City Hall, Room 2100
Alexandria, Virginia 22304

Re: Authorization to File a Special Use Permit
4320 Seminary Road, Tax Map No. 039.02-04-11 (the "Property")

Dear Mr. Moritz:

INOVA Health Care Services hereby authorizes Walsh, Colucci, Lubeley & Walsh, P.C. to act as agent on its behalf for the filing and representation of an application for a Special Use Permit on the Property and any related requests.

Very truly yours,

INOVA Health Care Services

By: 

Its: Senior Vice President

Date: February 27, 2024

If property owner or applicant is being represented by an authorized agent such as an attorney, realtor, or other person for which there is some form of compensation, does this agent or the business in which the agent is employed have a business license to operate in the City of Alexandria, Virginia?

Yes. Provide proof of current City business license

No. The agent shall obtain a business license prior to filing application, if required by the City Code.

NARRATIVE DESCRIPTION

3. The applicant shall describe below the nature of the request **in detail** so that the Planning Commission and City Council can understand the nature of the operation and the use. The description should fully discuss the nature of the activity. (Attach additional sheets if necessary.)

USE CHARACTERISTICS

4. The proposed special use permit request is for (*check one*):

a new use requiring a special use permit,

an expansion or change to an existing use without a special use permit,

an expansion or change to an existing use with a special use permit,

other. Please describe: _____

5. Please describe the capacity of the proposed use:

A. How many patrons, clients, pupils and other such users do you expect?

Specify time period (i.e., day, hour, or shift).

B. How many employees, staff and other personnel do you expect?

Specify time period (i.e., day, hour, or shift).

6. Please describe the proposed hours and days of operation of the proposed use:

Day:

Hours:

7. Please describe any potential noise emanating from the proposed use.

A. Describe the noise levels anticipated from all mechanical equipment and patrons.

B. How will the noise be controlled?

8. Describe any potential odors emanating from the proposed use and plans to control them:

9. Please provide information regarding trash and litter generated by the use.

A. What type of trash and garbage will be generated by the use? (i.e. office paper, food wrappers)

B. How much trash and garbage will be generated by the use? (i.e. # of bags or pounds per day or per week)

C. How often will trash be collected?

D. How will you prevent littering on the property, streets and nearby properties?

10. Will any hazardous materials, as defined by the state or federal government, be handled, stored, or generated on the property?

Yes. No.

If yes, provide the name, monthly quantity, and specific disposal method below:

11. Will any organic compounds, for example paint, ink, lacquer thinner, or cleaning or degreasing solvent, be handled, stored, or generated on the property?

Yes. No.

If yes, provide the name, monthly quantity, and specific disposal method below:

12. What methods are proposed to ensure the safety of nearby residents, employees and patrons?

ALCOHOL SALES

13.

A. Will the proposed use include the sale of beer, wine, or mixed drinks?

Yes No

If yes, describe existing (if applicable) and proposed alcohol sales below, including if the ABC license will include on-premises and/or off-premises sales.

PARKING AND ACCESS REQUIREMENTS

14. A. How many parking spaces of each type are provided for the proposed use:

- _____ Standard spaces
_____ Compact spaces
_____ Handicapped accessible spaces.
_____ Other.

Planning and Zoning Staff Only
Required number of spaces for use per Zoning Ordinance Section 8-200A _____
Does the application meet the requirement? <input type="checkbox"/> Yes <input type="checkbox"/> No

B. Where is required parking located? (*check one*)

- on-site
 off-site

If the required parking will be located off-site, where will it be located?

PLEASE NOTE: Pursuant to Section 8-200 (C) of the Zoning Ordinance, commercial and industrial uses may provide off-site parking within 500 feet of the proposed use, provided that the off-site parking is located on land zoned for commercial or industrial uses. All other uses must provide parking on-site, except that off-street parking may be provided within 300 feet of the use with a special use permit.

C. If a reduction in the required parking is requested, pursuant to Section 8-100 (A) (4) or (5) of the Zoning Ordinance, complete the PARKING REDUCTION SUPPLEMENTAL APPLICATION.

Parking reduction requested; see attached supplemental form

15. Please provide information regarding loading and unloading facilities for the use:

A. How many loading spaces are available for the use? _____

Planning and Zoning Staff Only
Required number of loading spaces for use per Zoning Ordinance Section 8-200 _____
Does the application meet the requirement? <input type="checkbox"/> Yes <input type="checkbox"/> No

B. Where are off-street loading facilities located? _____

C. During what hours of the day do you expect loading/unloading operations to occur?

D. How frequently are loading/unloading operations expected to occur, per day or per week, as appropriate?

16. Is street access to the subject property adequate or are any street improvements, such as a new turning lane, necessary to minimize impacts on traffic flow?

SITE CHARACTERISTICS

17. Will the proposed uses be located in an existing building? Yes No

Do you propose to construct an addition to the building? Yes No

How large will the addition be? _____ square feet.

18. What will the total area occupied by the proposed use be?

_____ sq. ft. (existing) + _____ sq. ft. (addition if any) = _____ sq. ft. (total)

19. The proposed use is located in: (*check one*)

a stand alone building

a house located in a residential zone

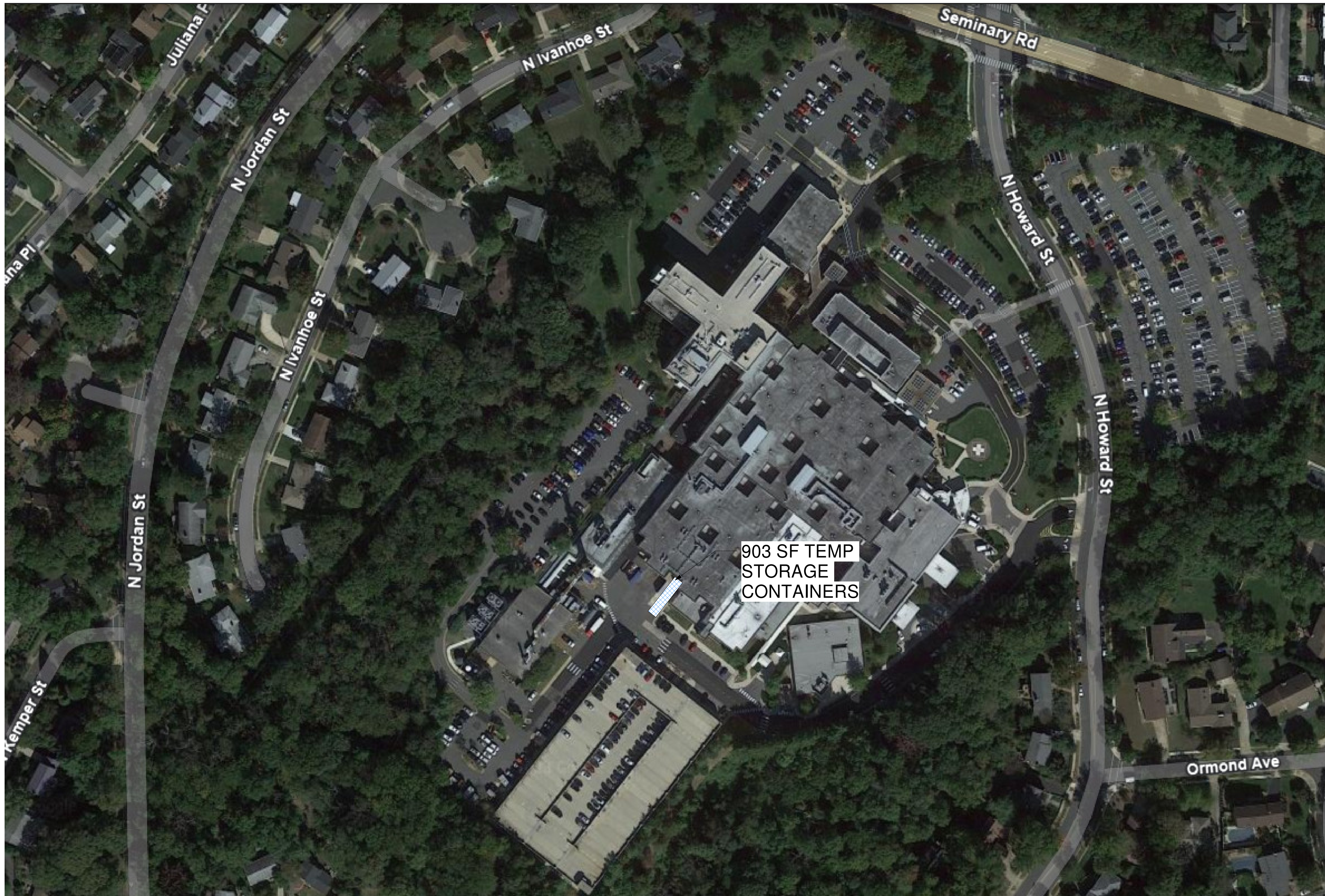
a warehouse

a shopping center. Please provide name of the center: _____

an office building. Please provide name of the building: _____

other. Please describe: _____

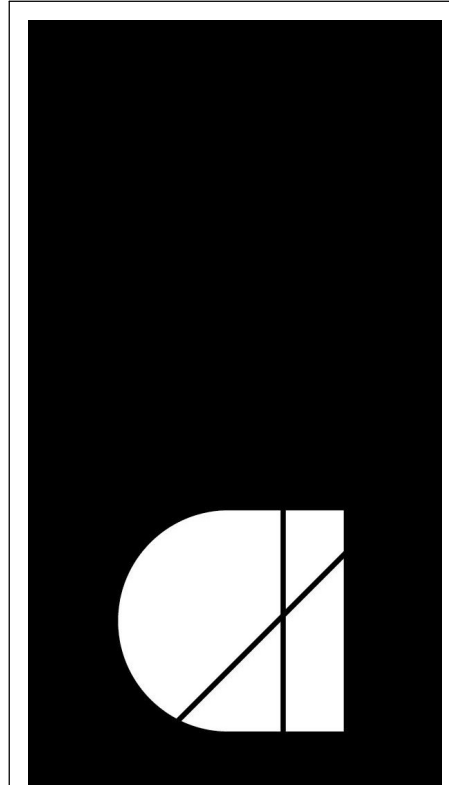
End of Application



903 SF TEMP
STORAGE
CONTAINERS

SCOPE OF WORK

THIS PROJECT INCLUDES THE INSTALLATION OF (2) MODULAR SHIPPING CONTAINERS TOTALING 903 GSF THAT WILL BE ASSEMBLED IN THE FIELD TO PROVIDE NON STERILE STORAGE FOR THE HOSPITAL. THE UNITS WILL COME WITH ALL MEP SYSTEMS PRE-INSTALLED REQUIRING MINIMUM DISTURBANCE TO THE EXISTING BUILDING. AN EXISTING FULL HEIGHT WINDOW WILL BE REMOVED TO ALLOW FOR THE CONNECTION INTO THE HOSPITAL. THE DISTURBANCE ASSOCIATED WITH THIS INSTALLATION WILL BE UNDER 2,500 SF, AND NO NEW IMPERVIOUS AREA WILL BE INTRODUCED WITH THIS CONSTRUCTION.



**architecture
incorporated**
1902 campus commons drive
suite 101
reston, virginia 20191
Tel: 703.476.3900
Fax: 703.264.0733
www.archinc.com

Construction Documents For:
**INOVA ALEXANDRIA HOSPITAL
IAH Mod Storage**

4320 SEMINAR ROAD,
ALEXANDRIA, VA 22304

Project: 23275-02

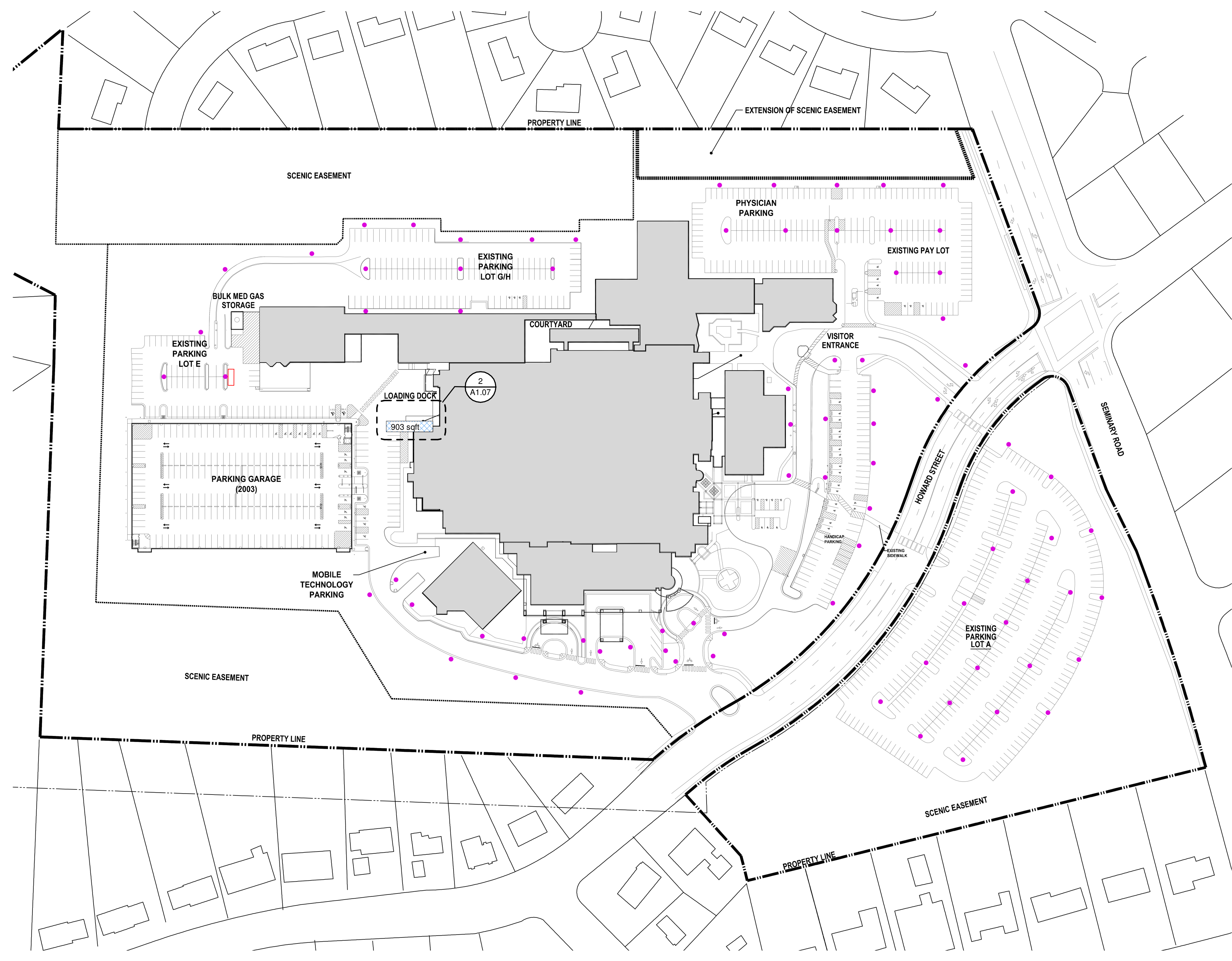
Issued 01/09/24
ZONING EXHIBITS
REVISIONS

OVERALL SITE

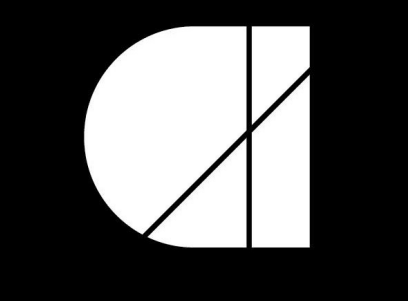
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ZONING EXHIBITS



1 OVERALL SITE PLAN
N.T.S



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REVISIONS

SITE PLAN

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Checked: Checker

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ZONING EXHIBITS



VIEW 4



VIEW 1



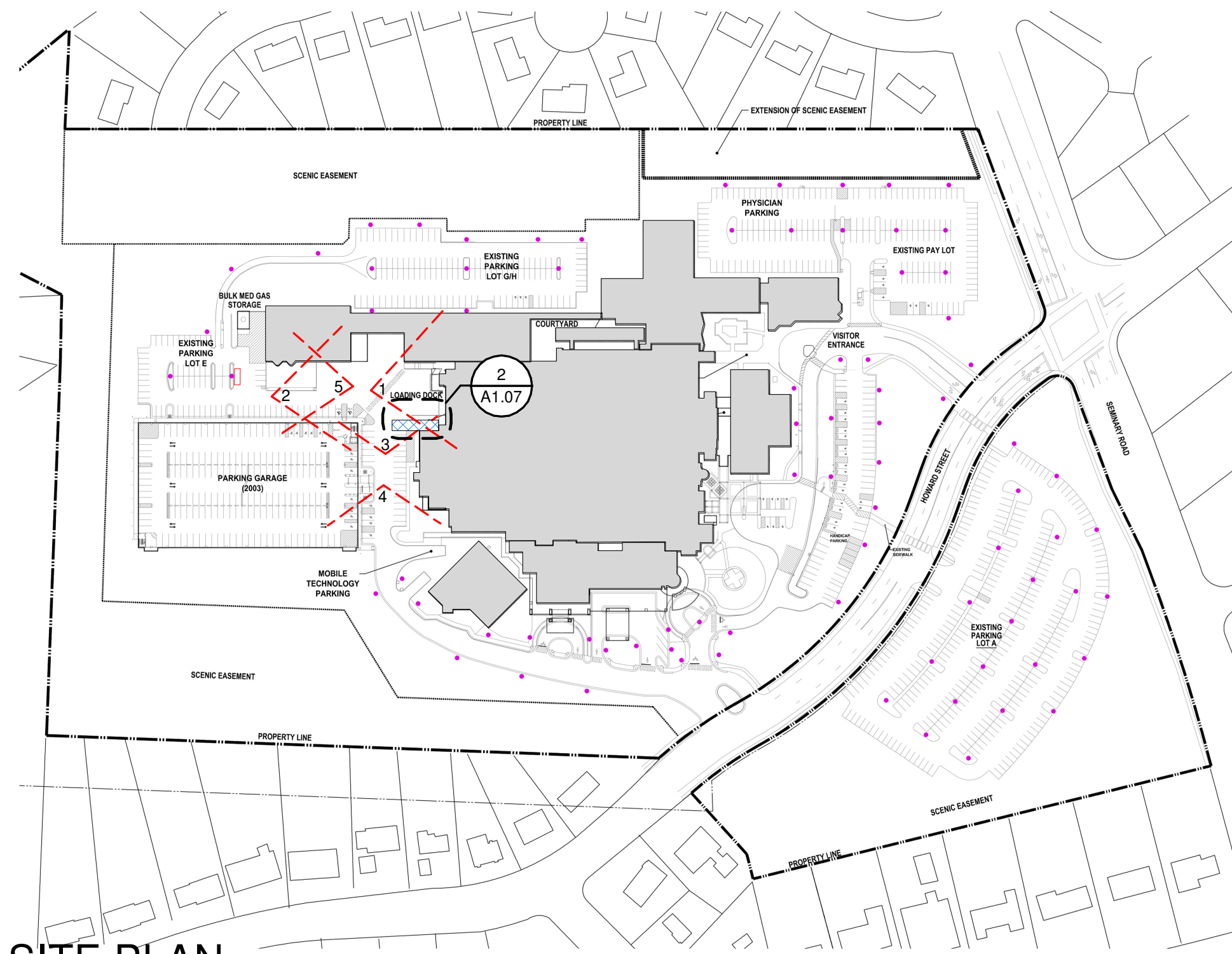
VIEW 5



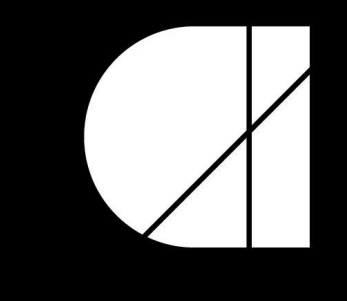
VIEW 2



VIEW 3



1 OVERALL SITE PLAN
1/16" = 1'-0"



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Construction Documents For:
**INOVA ALEXANDRIA HOSPITAL
IAH Mod Storage**

4320 SEMINAR ROAD,
ALEXANDRIA, VA 22304

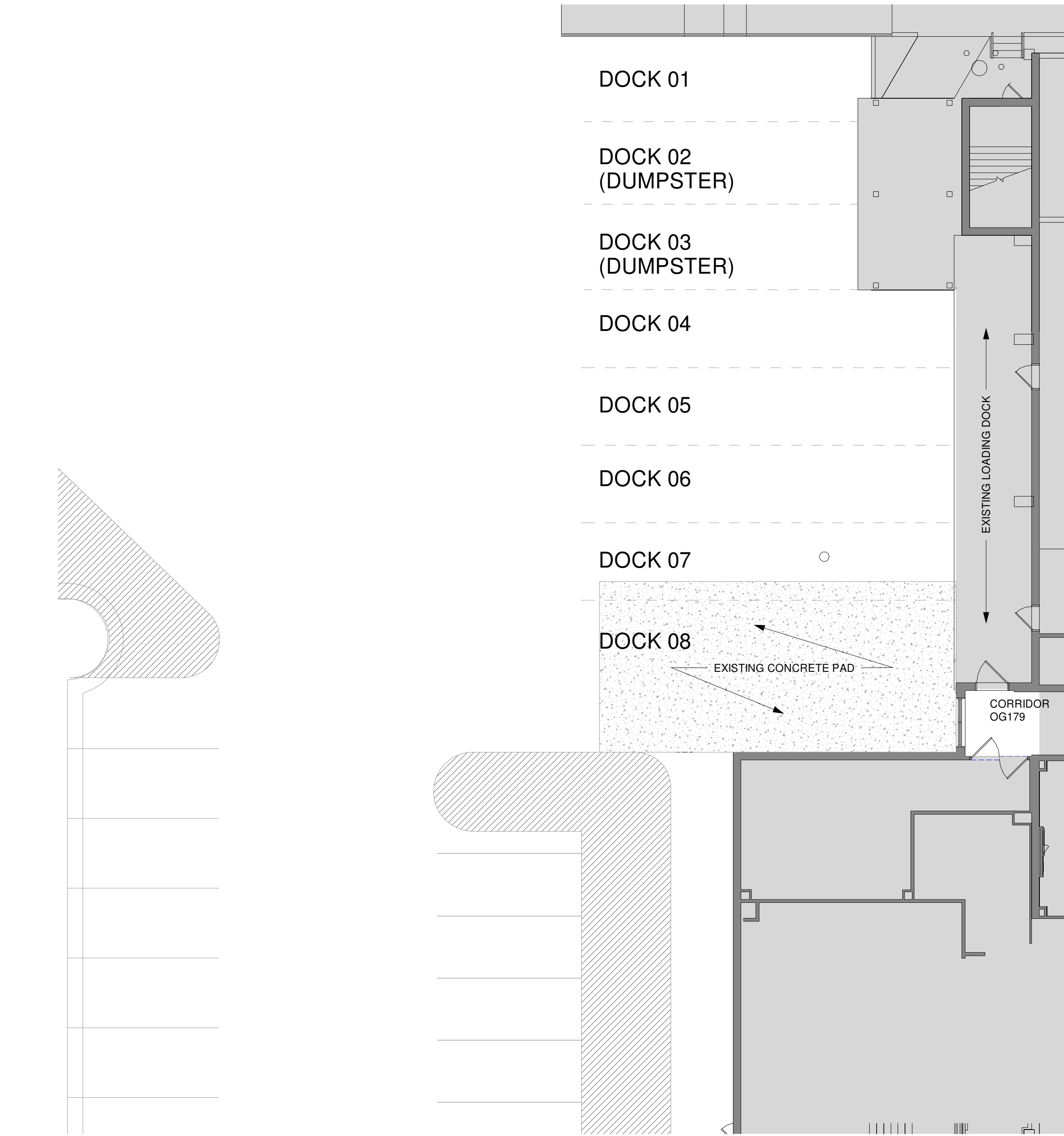
Project: 23275-02

Issued 01/09/24
ZONING EXHIBITS
REVISIONS

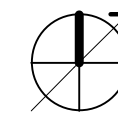
SITE PHOTOS

Scale: 1/16" = 1'-0"
Drawn: Author
Checked: Checker

A1.06



1 ENLARGED SITE PLAN - EXISTING
3/32" = 1'-0"



CIVIL ENGINEER TO CONFIRM:
-TRUCK TURNING RADIUS IS ACCEPTABLE FOR REMAINING DOCK SPACES
-BUILDING FAR ALLOWS FOR STORAGE ADDITION
-NO UNDERGROUND UTILITIES OR EASEMENTS THAT WOULD PREVENT STORAGE ADDITION

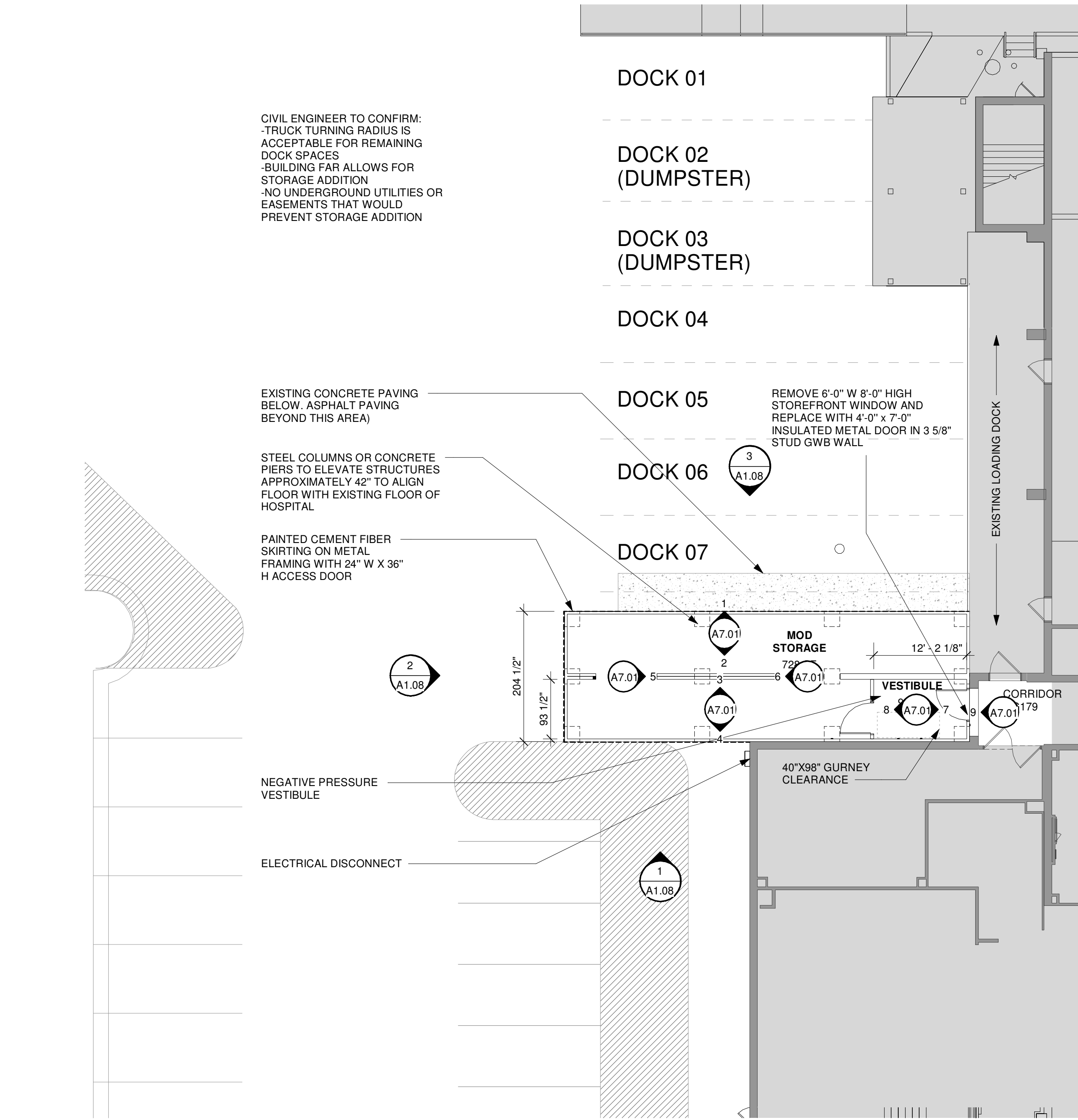
EXISTING CONCRETE PAVING BELOW. ASPHALT PAVING BEYOND THIS AREA)

STEEL COLUMNS OR CONCRETE PIERS TO ELEVATE STRUCTURES APPROXIMATELY 42" TO ALIGN FLOOR WITH EXISTING FLOOR OF HOSPITAL

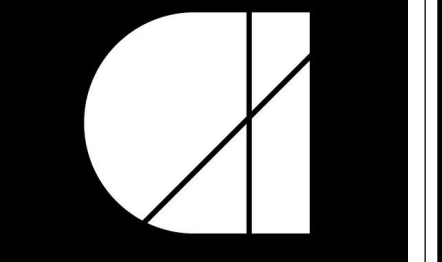
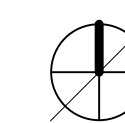
PAINTED CEMENT FIBER SKIRTING ON METAL FRAMING WITH 24" W X 36" H ACCESS DOOR

NEGATIVE PRESSURE VESTIBULE

ELECTRICAL DISCONNECT



2 ENLARGED SITE PLAN - NEW WORK
3/32" = 1'-0"



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Construction Documents For:
**INOVA ALEXANDRIA HOSPITAL
IAH Mod Storage**

4320 SEMINAR ROAD,
ALEXANDRIA, VA 22304

Project: 23275-02

Issued 01/10/24
ZONING EXHIBITS
REVISIONS

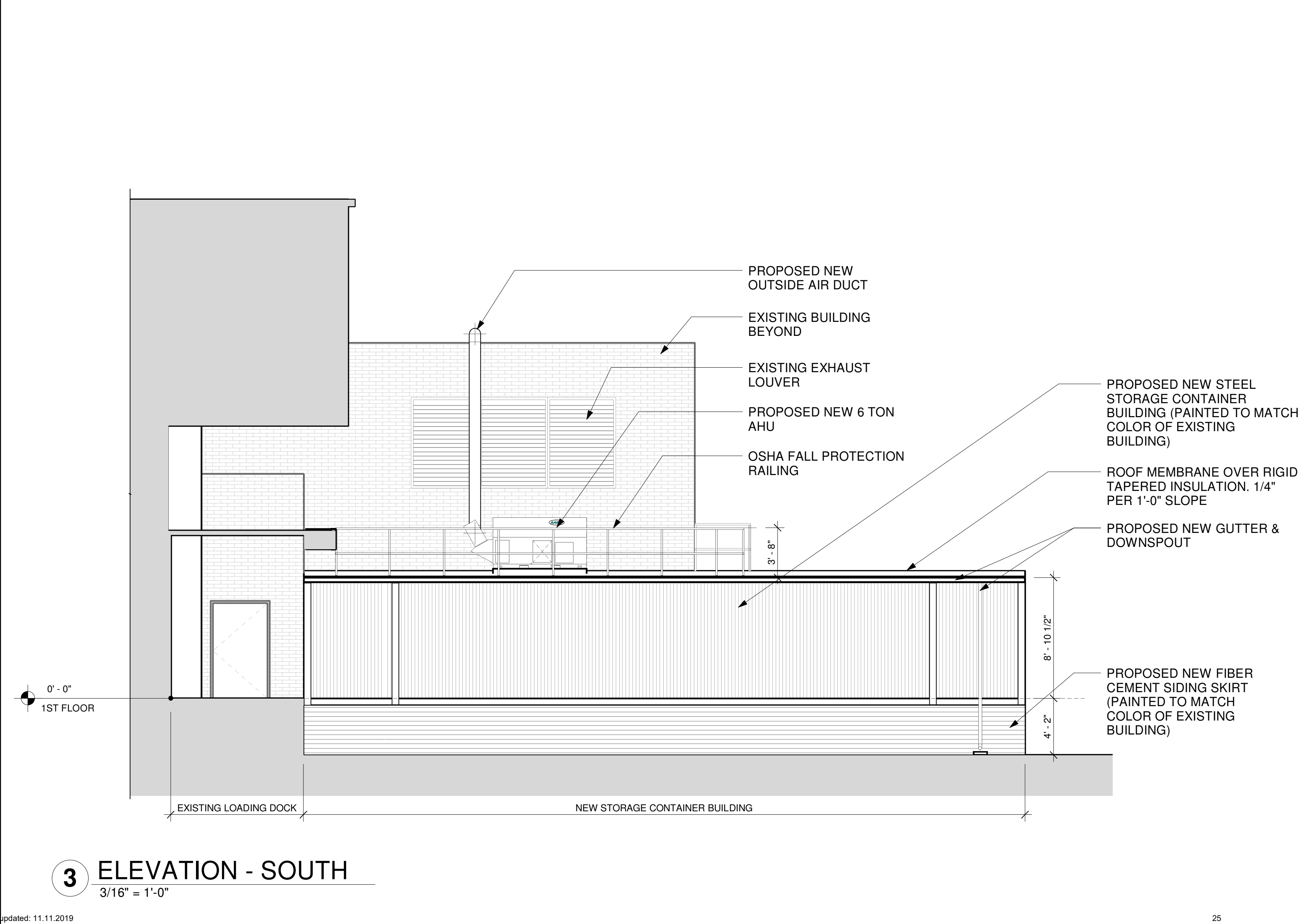
**ENLARGED SITE
PLAN**

Scale: 3/32" = 1'-0"
Drawn: Author
Checked: Checker

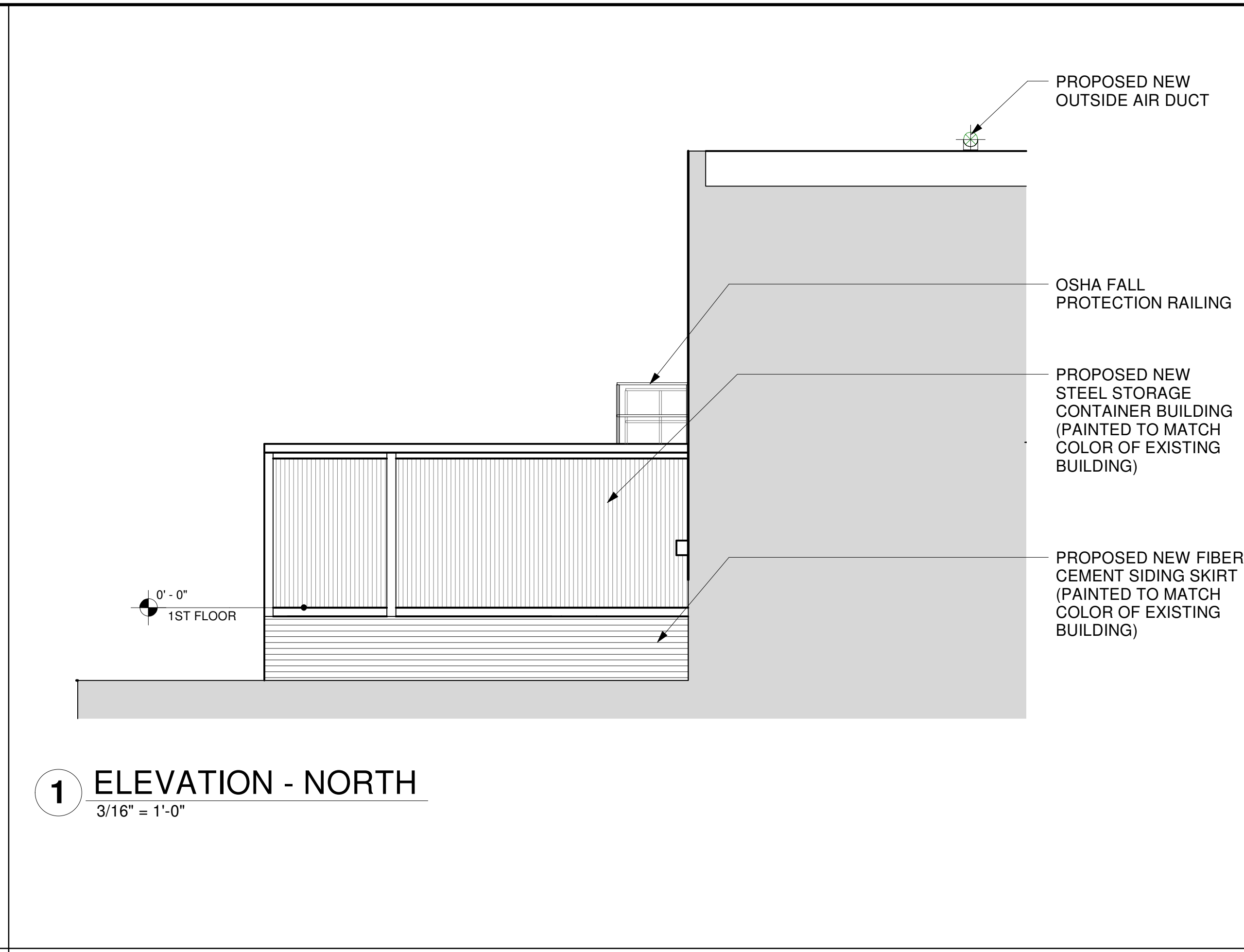
A1.07



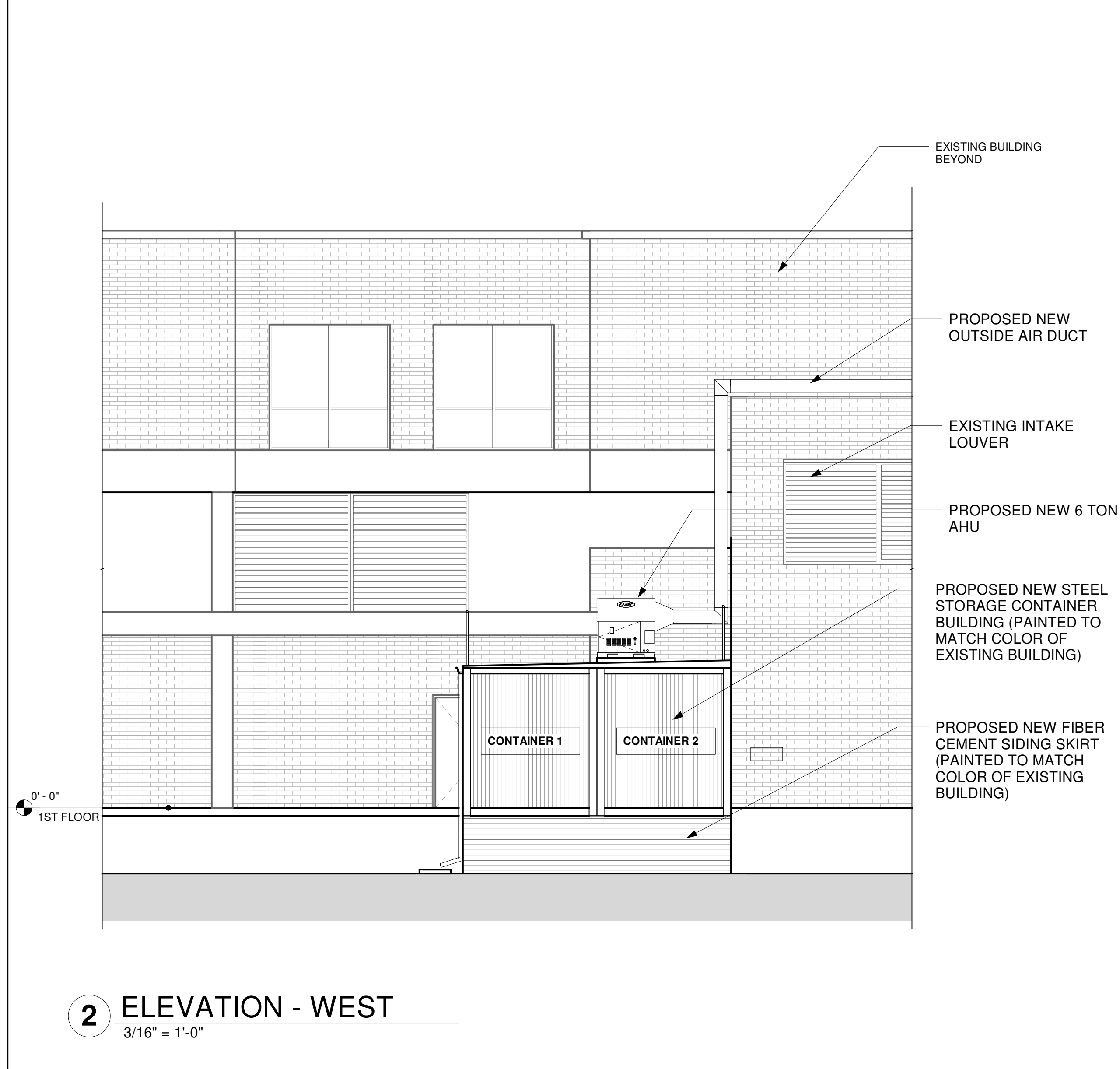
1 ELEVATION - NORTH
3/16" = 1'-0"



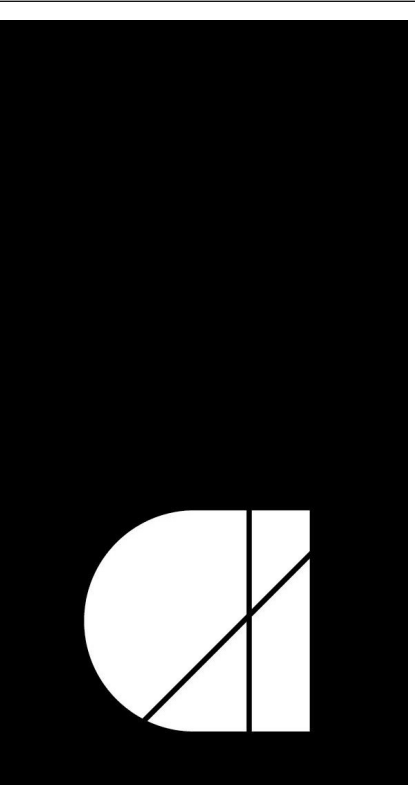
3 ELEVATION - SOUTH
3/16" = 1'-0"



2 ELEVATION - WEST
3/16" = 1'-0"



2 ELEVATION - WEST
3/16" = 1'-0"



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REVISIONS

ELEVATIONS

Scale: 3/16" = 1'-0"
Drawn: Author
Checked: Checker

A1.08

ZONING EXHIBITS



VIEW 1*



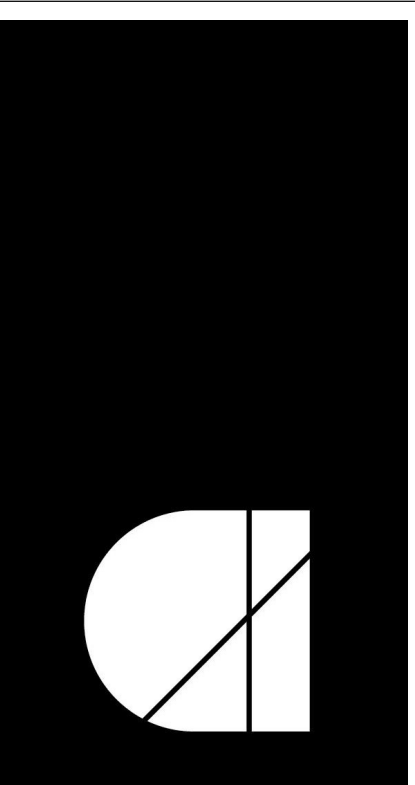
VIEW 2*



VIEW 3*



VIEW 4*



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ZONING EXHIBITS
REVISIONS

**STORAGE
CONTAINER
PHOTOS**

Scale:
Drawn: Author
Checked: Checker

A1.09

* PHOTOS ARE FOR REFERNCE ONLY , EXACT UNITS MAY DIFFER