

GOVERNMENT OF THE DISTRICT OF COLUMBIA
BOARD OF ZONING ADJUSTMENT



Application No. 15930 of The George Washington University, pursuant to 11 DCMR 3108.1, for a special exception under Section 210 for further processing of an approved campus plan to construct a 93-unit student residence facility, and a special exception under Section 411 to locate a penthouse a distance less than its height from all edges of the roof in an R-5-D District at premises 2350 H Street, N.W. (Square 42, Lot 844).

HEARING DATE: March 23, 1994
DECISION DATE: April 6, 1994

ORDER

EVIDENCE OF RECORD:

1. The property is located at the southeast corner of the intersection of 24th and H Streets and is known as premises 2350 H Street, N.W. It is zoned R-5-D.

2. The property is generally level and rectangular in shape, with a frontage of 137.21 feet along H Street and a frontage of 122 feet along 24th Street. The site abuts a portion of a 30-foot wide public alley at its southeast corner.

3. The property is currently operated as a parking lot for 57 vehicles and contains a total land area of 16,287 square feet.

4. To the east of the subject site are three, two-story semi-detached and row dwellings, two of which are owned by The George Washington University. The third structure is privately owned, and occupied as a dwelling. Further east is the Hillel Center, a religious organization, housed in a three-story structure on the southwest corner of the intersection of 23rd and H Streets N.W. Immediately south of the subject property is a nine story senior citizens apartment building called St. Mary's Court at 725 24th Street, N.W. Northwest diagonally across the intersection of 24th and H Streets from the subject site is a nine-story apartment house, Bon Wit Plaza. Across H Street to the north is the rear of the George Washington University School of Medicine and Applied Sciences. To the west across 24th Street is the nine-story Potomac Plaza apartment building.

5. The applicant is seeking special exception relief for further processing of an approved campus plan to construct a 93-unit student residence facility, and to allow a roof structure which is not set back from the edge of the roof a distance equal to

its height. The proposed facility is located within the boundaries of the approved George Washington University Campus Plan.

6. The site is located in an R-5-D District which permits matter of right general residential uses of high density development, including single-family dwellings, flats, and apartments to a maximum height of 90 feet, a maximum floor area ratio (FAR) of 3.5, and a maximum lot occupancy of 75 percent.

7. The proposed 93-unit residence facility is designed to accommodate 354 students. The plans provide for nine, one-bedroom units and 84, two-bedroom units. Laundry and trash facilities will be provided on the second floor. A common space area and vending machine area will be available on the first floor. The facility will also include a state of the art electronic library and an underground two-level garage with 57 parking spaces.

8. The proposed structure will be built of masonry, to a height of 80 feet and nine stories. The facility will have a floor area ratio of 6.2, and will raise the aggregate campus-wide residential floor area ratio from 2.25 to 2.33. The maximum permitted FAR specified in the University's approved Campus Plan is 3.5. The 2.33 FAR cited does not include the proposed WETA, Marvin Center or Health and Wellness projects. The building's facade is designed to be architecturally compatible with development in the neighborhood and the facade will incorporate the red brick color common throughout the campus. *

9. The George Washington University Campus Plan, Year 1985 Through 2000, revised Exhibit 44, dated October 12, 1993, Land Use Map identifies the subject site's land use designation as Residential with Educational Mixed Use. The Campus Plan also identifies the subject site as a preferred residential site. The proposed student residence facility is consistent with these land use designations.

10. The applicant presented testimony that the proposed facility meets the test of special exception approval under the provisions of Section 210, and Subsection 3108.1 of the Zoning Regulations specifically as relates to noise, traffic, number of students, and other objectionable impacts, as follows:

- a. The masonry construction of the building has inherent sound insulation qualities. The proposed facility is not expected to generate a level of noise in excess of that typically generated by an apartment house of similar size. Included in the building's construction will be energy efficient windows and other insulation materials which have the added benefit of deaden-

ing sounds. The windows will be casement-type in design, and will be installed with stops to allow them to be only partially opened. The windows on the east side of the building will not be operable to further reduce any potential noise impacts.

- b. The construction and occupancy of the proposed residence facility will not raise the student enrollment of the University. The facility is being built to serve the needs of the undergraduate student population. The facility is designed to offer an attractive on-campus alternative to undergraduate students living off campus. The proposed facility is located on a site identified in the University's approved campus plan as the preferred housing site.
- c. The plans call for the location of a loading area at the rear of the proposed building. The loading area will facilitate the removal of trash and handle deliveries by van-sized vehicles. Major deliveries to the building by larger sized vehicles will be routed to the University's Support Building located in the 2000 block of F Street, N.W. Trash will be compacted and stored inside the building and will be collected by small van-sized vehicles. Compacting and storing trash inside the building will prohibit access by rodents and will help maintain the exterior of the site clean and free from litter, rodents, and liquid waste.
- d. Except for the closing of the 57-space parking lot during the construction of the residence facility and replacement with a 57 space parking garage, there will be no permanent displacement of a University use as a result of this case. Very few student residents of the building are expected to have automobiles at their personal disposal on-campus. Present acceptable traffic levels of service on 24th and H Streets will not fall below the current operating status. The entrance to the underground parking garage has been designed so as not to be disruptive to pedestrian and vehicular movement.
- e. There will be no increase in the number of faculty and staff on the campus as a result of the approval of the application. No additional visitor traffic to the campus will occur as a result of the proposed use.

10. Subsection 411.11 allows the Board to grant special exception relief from the roof structure provisions when the Board finds that the strict compliance with said provisions is impracticable because of operating difficulties, size of building lot, or other conditions relating to the building or surrounding area that would tend to make full compliance unduly restrictive, prohibitively costly, or unreasonable. The Board is empowered to approve the location, design, number, and all other aspects of such roof structure provided that granting of the special exception will not materially impair the purpose and intent of the Zoning Regulations and the light and air of adjacent buildings will not be affected adversely.

11. The applicant presented testimony that the penthouse setback at this location does not impair the intent of the Zoning Regulations because of the substantial distance that it is set back from the H Street property line. The proposed penthouse is pushed back over 40 feet from the property line along H Street as a result of the depth of the front court yard. In addition, the proposed penthouse is 16 feet in height rather than the maximum 18.5 feet allowed by the Zoning Regulations. The applicant noted that a portion of the north side of the proposed building's roof penthouse would not be set back a distance at least equal to its height as required by the Zoning Regulations. This portion of the penthouse wall would be located approximately three feet back from the building wall at the base of the open court on H Street.

12. The applicant presented testimony that the proposed building is U-shaped, creating a large open court area off of H Street, the main entrance to the building. The U-shaped design allows for a floor plan which maximizes the number of units in the building. The design would allow for the creation of an open space that would be landscaped. As the result of the court, the main entrance of the building would be pushed back approximately 44-feet from the property line. The applicant testified that if the building has been designed to front along H Street in a more typical wall-on-front-property-line configuration, the penthouse could theoretically have been located a minimum of 16 feet back from the building's roof edge and H Street.

13. The applicant presented testimony that the roof structures location and design are necessary in order to enclose all of the service stairs, mechanical equipment, and elevators which protrude above the roof level and that the technical requirement that all of these roof projections be enclosed precludes the applicant's ability to comply with the strict interpretation of Section 411. All of the other requirements of Section 411 are complied with, including maximum FAR, height, color and design.

14. The applicant testified that the possible visual impact of the portion of the north side of the penthouse that would not meet the setback requirement would be substantially reduced and offset by the creation of the court and by the 44-foot setback from the property line. In addition, the front penthouse wall adjacent to the front courtyard would be located behind an architectural embellishment which is designed to soften the visual effect of the penthouse from this location.

15. Pursuant to the previous orders relating to the George Washington University Campus Plan in BZA Application No. 14455, the Board has set forth requirements which are in addition to the normal special exception requirements of the Zoning Regulations for new structures or additions within the University campus plan area. Specifically, the University must comply with the following requirements of BZA Order No, 14455 relative to this application:

The University shall submit a special exception to the Board for each structure or addition to an existing structure which the University proposes to construct over the life of the Plan. In addition to a demonstration of compliance with applicable provisions of the Zoning Regulations and the contents of the approved 1985 Campus Plan, each application shall include the following:

- a. A showing that the use, height, bulk and design (including the location of any means of approach and egress) of the proposed structure are sensitive to and compatible with adjacent and nearby non-University owned structures and uses; and
- b. Recomputation of the University's total floor area ratio (FAR), copies of which shall be submitted to the Zoning Administrator. Such information shall be broken down by zone District and include the following; existing and occupied FAR; FAR under construction pursuant to Board approval; and FAR upon completion of the proposed structure.
- c. The University shall notify the Office of Planning and ANC-2A of its development plans for a specific site following approval of the proposal by appropriate University committees and the University's Board of Trustees and prior to the completion of final, detailed plans and specifications.

d. The University shall designate at least one University-owned site within the campus boundary as a preferred development site for University residential use. The University shall also designate at least one University-owned site within the campus boundary as an alternative development site for residential use.

e. The University shall provide between 2,700 and 3,000 off-street parking spaces within the campus boundary.

16. In response to the above, based upon the evidence and testimony the applicant presented testimony that:

(a) The height, bulk and design, including the location of any means of approach and egress, for the proposed structure have been carefully developed to be sensitive to and compatible with adjacent and nearby non-University owned structures. The residential use of the structure is consistent with the mix of residential and institutional uses in the immediate area. As such, the proposed residential facility will not tend to adversely affect said uses in any way.

(b) The applicant submitted an exhibit containing a recomputation of the University's total FAR broken down by zone district and including existing and occupied FAR; FAR under construction pursuant to Board approval; and the total FAR including the proposed use. The Zoning Regulations permit the University to develop its residentially-zoned property to a campus-wide aggregate FAR of 3.5. Upon completion of the proposed project, the University's overall campus FAR would be increased slightly from 2.25 to 2.33.

(c) The applicant presented its development plans for the subject site through meetings and correspondence with the Office of Planning and ANC-2A prior to the completion of final plans for the project.

(d) The applicant testified that this project specifically addresses the housing component of the Campus Plan. The subject site is clearly identified in the Campus Plan as a preferred site for new on-campus residential development. The proposed project represents a major campus plan implementation initiative.

(e) The proposed student residence facility will neither increase or decrease the number of students, faculty, or parking spaces on the campus, nor will it

increase the demand for parking. There are presently 2,840 off-street parking spaces within the Campus boundary. The applicant asked that it be allowed the flexibility to provide an additional 14 spaces on a third garage level if soil conditions and cost considerations allow.

17. The Office of Planning (OP) by memorandum dated March 16, 1994, recommended approval of the application. The OP was of the opinion that the proposed construction of a dormitory is needed to provide an on-campus student residential facility that adequately meets the present day needs of the University and its students. The OP was further of the opinion that by constructing the facility, the University would also address a long-standing demand by the community for the provision of residential facilities on the University's campus. The OP noted that the proposed facility would not result in an increase in the number of students and faculty or staff and that, with the proposed project, the bulk and height of buildings on the campus would not exceed that which is permitted in the approved campus plan. The Office of Planning was of the opinion that the applicant met the burden of proof for the requested special exception relief under Sections 210 and 411 of 11 DCMR and that the use and operation of the proposed facility would not impair the intent, purpose, and integrity of the Zoning Regulations for the R-5-D District.

18. By memorandum dated March 15, 1994, the Department of Public Works (DPW) supported the granting of the application. The DPW was of the opinion that the proposed new on-campus housing would reduce vehicle trips to and from the campus, thereby creating a positive impact on the campus and the surrounding neighborhood. The DPW was further of the opinion that from a transportation perspective, the proposal would have no measurable adverse impact on the surrounding street system.

19. By memorandum dated February 1, 1994, the D.C. Fire Chief offered no objection to the granting of the application. The Fire Chief noted that fire and life safety features required by city codes such as fire alarms, sprinkler systems, standpipe systems, exits, fire rated separations, fire extinguisher, etc., would be determined during the plan review process as part of the building permit application review.

20. By letter dated January 21, 1994, the D.C. Metropolitan Police Department (MPD) offered no opposition to the application. The MPD was of the opinion that the proposal would not affect the public safety in the immediate area or generate an increase in the level of police now being provided.

21. By resolution dated March 18, 1994, ANC-2A supported the granting of the application if the applicant provides a staffed 24-

hour desk/message center in the lobby level to enhance security and agrees to the following permanent and temporary operating conditions.

Permanent Operating Conditions:

- A. Deliveries shall be limited to the hours of 7:00 a.m. - 7:00 p.m. on Monday through Friday, and 8:00 a.m. - 6:00 p.m. on Saturday, and none on Sunday.
- B. Trash pick-up shall be limited to 7:00 a.m. - 7:00 p.m. on Monday through Friday, and 9:00 a.m. - 6:00 p.m. on Saturday, and none on Sunday.
- C. No semitrailers shall be permitted to enter the back alley and make deliveries. If necessary, use of a central loading point from which deliveries could be brought to the residence hall by smaller vehicles should be required.
- D. Delivery vehicles and other vehicles shall not be allowed to idle at the loading dock area or when waiting to approach the loading dock area.
- E. Adopt stringent standards regarding pollution, trash, and rodents. The loading area and alley should be kept clean and free from litter and liquid wastes.
- F. There shall be an attendant at the reception desk 24-hours per day.

Construction Period Conditions:

- A. Limit construction activity, with its attendant noise, to 8:00 a.m. - 5:00 p.m., on Monday through Friday, 9:00 a.m. - 5:00 p.m. on Saturday, and none on Sunday. This shall include no on-site warming up of machinery, equipment, or the equivalent along 24th or H Streets, or in the alley, and no workers on-site.
- B. Limit the location of construction office trailers, cranes, trucks, waste dumpsters, and other vehicles and equipment, and of construction materials, to the site itself and/or to the parking lanes on H and 24th Streets only.
- C. Restore the pavement in the alleyway and along 24th and H Streets, as necessary, at the conclusion of the construction period.

- D. Take all necessary precautions to ensure that no damage is caused to buildings adjacent to the site, and especially to the private residence located immediately next to the site on H Street.

22. The Senior Warden of St. Mary's Episcopal Church testified at the public hearing. While he did not testify in opposition to the application, he noted a concern with how the residence facility would impact the public alley. In response, the University indicated that the use of the alley would be limited to minivan-sized vehicles and smaller University utility vehicles. No semitrailers would use the alley to make deliveries to the site.

23. The owner of 2310 H Street, N.W., located immediate east of the subject site, opposed the granting of the application. The opposition is generally summarized as follows:

- a. The adverse impacts a structure of the height and bulk proposed would have on the light and air to the existing single-family residence;
- b. The adverse impacts of the proposed loading dock, trash compactor, elevator shafts, generator, physical plant activities, and parking garage entrance would have on the residence due to the project's close proximity to the dwelling;
- c. The loss of available on-street parking along H Street between the dwelling and the corner of 24th Street due to the location of the entrance to the project;
- d. The increase in noxious fumes generated by vehicles entering and departing the facility, higher density traffic along H Street and delivery trucks and buses;
- e. The noise occurring during the proposed hours of construction, trash pick up hours, and service delivery hours would adversely impact the quality of living of the residents of 2310 H Street;
- f. The project would increase existing traffic congestion in the public alley;
- g. The use of heavy construction equipment will damage the surface of the public alley; and
- h. The proposed construction is likely to cause structural damage to the existing dwelling.

24. In addressing the conditions recommended by the ANC and the concerns of the opposition, the applicant responded as follows:

- a. The University agrees to limit deliveries to the hours of 7:00 a.m. to 7:00 p.m. on Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday, and none on Sunday. During the months the student residence facility would be used to house conference attendees. This necessitates the need for Sunday deliveries for items such as daily linen services.
- b. The University agrees that trash pick up shall be limited to between 7:00 a.m. and 7:00 p.m. on Monday through Friday, and between 8:00 a.m. and 6:00 p.m. on Saturday, and none on Sunday.
- c. The University agrees to prohibit semitrailers from entering the back alley and making deliveries. The use of a central loading point from which deliveries could be brought to the residence hall by smaller vehicles will be required.
- d. The University agrees to prohibit delivery vehicles and other vehicles from idling at the loading dock area or when waiting to approach the loading dock.
- e. The University agrees to continue to observe stringent standards, policy and practice regarding pollution, trash and rodents. The loading area and alley will be kept clean and free from litter and liquid wastes.
- f. The University agrees to maintain an attendant at the reception desk 24 hours per day.
- g. The applicant will follow the requirements specified in the D.C. Building Code and by the Metropolitan Police Department with regard to the time, days, and operational requirements of construction activity. The applicant stated that the University would be required to restore the pavement in the alleyway and along 24th and H Streets, as necessary, at the conclusion of the construction period.
- h. The University will take all necessary precaution to ensure that no damage is caused to property abutting the site as a result of construction. The University will ask for cooperation from neighboring property owners to document present interior building conditions.
- i. The University will provide adjoining property owners with the name and telephone number of a University official who will respond to any future problems that the adjacent owner perceives as being caused by the University.

25. At the conclusion of the public hearing, the Board left the record open for the applicant to submit a detailed landscaping plan of the loading area and public alley, the relationship of the proposed design to adjoining property, and the applicant's proposal with respect or protecting the adjoining property.

26. On March 28, 1994, the applicant submitted a "Service alley improvement study" and landscaping plan. In response to the applicant's alley plan, the continued opposition was based on the reduction of the size of the service area and obstruction to the church building windows and walls of structures adjoining the alley.

FINDINGS OF FACT:

1. The Board finds that the proposed facility complies with the special exception criteria set forth in 11 DCMR 210 and 411.

2. The proposed site has been designated as a preferred housing site under the approved campus plan as set forth in BZA Order No. 14455.

3. The height, bulk and design of the project are compatible with existing development in the area. The architectural design and materials of the facade are in keeping with the design elements and red brick color common to the campus development. The use of the structure for student housing is in keeping with the residential/institutional character of the immediate neighborhood and the approved campus plan.

4. The proposed project will not increase the present student enrollment of the University, but is designed to provide on-campus housing for the existing undergraduate student population. There will be no increase in the number of faculty or staff of the University as a result of this project.

5. The applicant has provided 57 underground parking spaces to replace the existing 57 surface parking spaces so that the total number of parking spaces on campus would remain within the 2,700 to 3,000 range currently required by the approved campus plan.

6. The project would have the same general impact as any 93-unit apartment house with respect to the generation of noise. The proposed masonry construction, installation of energy efficient windows and other insulation materials, and the provision of windows stops would minimize any noise impacts generated by the project. In addition, the windows on the east side of the building will not open to further reduce any potential noise impacts.

7. The applicant has agreed to conditions related to alley usage, deliveries, trash-pick-up, pollution, rodent control operations and construction activities to mitigate any potential adverse impact on adjoining or nearby property and the public alley as set forth in Summary of Evidence No. 24 above.

8. Although the roof structure does not conform to the set back provisions, the residential design of the structure incorporates a large courtyard to optimize the amount of natural light and ventilation to the structure which results in an actual penthouse set back from the street of approximately 47 feet.

9. The proposed location of the penthouse will not materially impair the intent and purpose of the Zoning Regulations, nor adversely affect the light and air to adjacent buildings.

CONCLUSIONS OF LAW AND OPINION:

Based on the foregoing findings of fact and evidence of record, the Board concludes that the applicant is seeking special exception relief, the granting of which requires a showing of compliance with the requirements of Sections 210, 411 and 3108.1 of the Zoning Regulations, and that the requested relief can be granted as being in harmony with the general purpose and intent of the Zoning Regulations. The Board further must find that the proposal will not tend to affect adversely the use of neighboring property.

The Board concludes that the applicant has meet the requisite burden of proof. As to the special exception relief under Section 210 and Subsection 3108.1, the Board concludes that the use is located so as to not likely become objectionable because of noise, traffic, number of students or other objectionable conditions. The Board notes that the approved Campus Plan for the University designates the site in the "Residential with Educational Mixed-Use" category, and as a preferred housing site. The Board concludes that the use, height, bulk and design of the proposed student residence facility would not impair the intent, purpose and integrity of the R-5-D District regulations. The Board further concludes that, as hereinafter conditioned, the project is not likely to adversely impact adjacent or nearby properties. The specific design of the building is based on its use as a residential facility, to optimize the amount of natural light and ventilation.

As to the special exception from the roof structure setback provisions of Section 411 and Subsection 3108.1, the Board concludes that the proposed roof structure will not impair the intent of the Zoning Regulations, or adversely affect the use of neighboring properties. The proposed roof structure is set back

from the street line approximately 47 feet and is not likely to have an adverse impact on the light and air to adjoining property nor to be visually obtrusive.

The Board concludes that it has accorded to ANC-2A the "great weight" to which it is entitled. Accordingly, it is hereby ORDERED that the application is GRANTED subject to the following CONDITIONS:

1. Construction shall be as shown on the plans marked as Exhibit No. 26E and 34A of the record, except that the applicant shall have the flexibility to provide up to 14 additional parking spaces, if practicable.
2. Deliveries shall occur only between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday; 9:00 a.m. and 6:00 p.m. on Saturday; and 9:00 a.m. and 2:00 p.m. on Sunday.
3. Trash pick up shall be limited to the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday and 8:00 a.m. to 6:00 p.m. on Saturday. There shall be no trash pick-up on Sundays.
4. No semitrailer-sized vehicles shall be permitted to make deliveries to the site via the public alley.
5. No vehicles shall be allowed to idle at the loading dock area or when queuing to approach the loading dock area.
6. The reception desk shall be attended on a 24-hour basis.
7. Access to the parking area at the rear of premises 2310 H Street, N.W. shall not be blocked by vehicles in the public alley at any time.
8. The applicant shall construct a six-foot high screening wall between the loading dock and adjacent property. The height of the screening wall shall be measured from the loading dock side.
9. The applicant shall maintain the loading dock area free of litter and liquid waste. The applicant shall adopt and maintain stringent operating standards with respect to controlling pollution, trash and rodents.
10. The applicant shall comply with all applicable D.C. Government regulations and codes with respect to construction activities, protection of adjoining properties, and repair of any damage to adjoining property or public space.

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VOTE: 4-0 (Craig Ellis, Laura M. Richards, George Evans and
Angel F. Clarens to grant).

BY ORDER OF THE D.C. BOARD OF ZONING ADJUSTMENT

ATTESTED BY:


MADELIENE H. ROBINSON
Director

FINAL DATE OF ORDER:

MAY 27 1994

PURSUANT TO D.C. CODE SEC. 1-2531 (1987), SECTION 267 OF D.C. LAW 2-38, THE HUMAN RIGHTS ACT OF 1977, THE APPLICANT IS REQUIRED TO COMPLY FULLY WITH THE PROVISIONS OF D.C. LAW 2-38, AS AMENDED, CODIFIED AS D.C. CODE, TITLE 1, CHAPTER 25 (1987), AND THIS ORDER IS CONDITIONED UPON FULL COMPLIANCE WITH THOSE PROVISIONS. THE FAILURE OR REFUSAL OF APPLICANT TO COMPLY WITH ANY PROVISIONS OF D.C. LAW 2-38, AS AMENDED, SHALL BE A PROPER BASIS FOR THE REVOCATION OF THIS ORDER.

UNDER 11 DCMR 3103.1, "NO DECISION OR ORDER OF THE BOARD SHALL TAKE EFFECT UNTIL TEN DAYS AFTER HAVING BECOME FINAL PURSUANT TO THE SUPPLEMENTAL RULES OF PRACTICE AND PROCEDURE BEFORE THE BOARD OF ZONING ADJUSTMENT."

THIS ORDER OF THE BOARD IS VALID FOR A PERIOD OF SIX MONTHS, UNLESS WITHIN SUCH PERIOD AN APPLICATION FOR A BUILDING PERMIT OR CERTIFICATE OF OCCUPANCY IS FILED WITH THE DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS.

ord15930/SS/LJP

GOVERNMENT OF THE DISTRICT OF COLUMBIA
BOARD OF ZONING ADJUSTMENT



BZA APPLICATION NO. 15930

As Director of the Board of Zoning Adjustment, I hereby certify and attest to the fact that on MAY 27 1994 a copy of the order entered on that date in this matter was mailed postage prepaid to each party who appeared and participated in the public hearing concerning this matter, and who is listed below:

Wayne S. Quin, Esquire
Wilkes, Artis, Hedrick & Lane
1666 K Street, N.W., Suite 1100
Washington, D.C. 20006

Jean Swift, Chairperson
Advisory Neighborhood Commission 2A
1920 G Street, N.W., #100
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Bradford A. Tatum
St. Mary's Episcopal Church
728 23rd Street, N.W.
Washington, D.C. 20037

Horie Williams
c/o Shirley C. Williams
2310 H Street, N.W.
Washington, D.C. 20037

A handwritten signature in cursive script, reading "Madeliene H. Robinson".

MADELIENE H. ROBINSON
Director

DATE: MAY 27 1994