

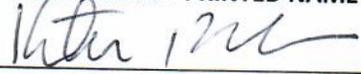
**TOWN OF BLACKSBURG  
CONDITIONAL USE PERMIT APPLICATION**

This application and all accompanying information must be submitted in full before the Conditional Use Permit can be accepted by Town staff. Once the Planning and Building Department accepts the application, it will be referred to the Planning Commission and Town Council for consideration. The application and all accompanying information will become conditions of approval. Any conditions of approval are binding. Other conditions may apply. Please contact the Planning and Building Department at (540) 443-1300 for application deadline or questions, or to schedule the **required** pre-submittal meeting.

The following items **MUST** accompany this application for the Town of Blacksburg to accept this application for processing and review. Any items submitted cannot be larger than 11x17 in size:

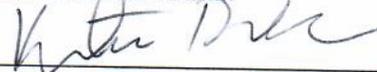
- 1) Written, signed consent of the property owner. If the applicant is the contract purchaser, the written consent of the property owner is required
- 2) One copy of a site plan with surveyed boundaries for the property showing the lot, existing and proposed structures, site improvements, stormwater management areas, parking areas and spaces, and any other information necessary to determine the ability to meet the Zoning Ordinance site development standards, Use & Design standards and physical compatibility with the neighborhood
- 3) Stormwater Management Concept Plan and calculations
- 4) Building elevations for all proposed buildings -or- elevations showing any changes to existing buildings
- 5) Sketch depicting any proposed signage
- 6) Vicinity map (may be included on the site plan) showing surrounding uses, zoning districts, buildings and other improvements within 300' of the property
- 7) Completed VDOT 527 (Traffic Impact Analysis) Form
- 8) A list of adjacent property owners (including properties across a street) and their addresses, plus the cost of CERTIFIED FIRST CLASS postage for notifying each adjacent property owner (no stamps, please)
- 9) Fee of \$100 for the Town of Blacksburg to post all public hearing signs. **Please note:** the applicant may choose to post the property, using signs provided by Town Staff, and not be subject to the posting fee
- 10) Fee of \$500 for Conditional Use Permit or amendments to existing Conditional (special) Use Permits. Please make your check or money order payable to the TOWN OF BLACKSBURG
- 11) Proof of pre-submittal meeting between Town staff and applicant/agent
- 12) Prior to the initiation of an application for Conditional Use Permit, or prior to the issuance of final approval, the applicant shall produce satisfactory evidence that any delinquent real estate taxes owed, which have been properly assessed against the subject property, have been paid (§ 1150)
- 13) Any applicant for a Conditional Use Permit shall make complete disclosure of the equitable ownership of the real estate to be affected including, in the case of corporate ownership, the names of stockholders, officers and directors, and in any case the names and addresses of all of the real parties of interest. The requirement of listing names of stockholders shall not apply to a corporation whose stock is traded on a national or local stock exchange, and which corporation has more than 500 shareholders (§ 1110)
- 14) Digital copies (PDF) of all application materials are required at the time of submittal, or within 10 working days of the submittal date.

**SIGNATURE OF APPLICANT/CONTACT PERSON + PRINTED NAME:**

Kristen DeLack  DATE: 1/22/2020

By signing this application, I affirm that this application is complete and all required items are included

**SIGNATURE OF PROPERTY OWNER + PRINTED NAME:**

Kristen DeLack  DATE: 1/22/2020

By signing this application, I affirm that this application is complete and all required items are included

Location or Address of Property for Conditional Use Permit:  
409 Roanoke St. E, Blacksburg, VA 24060

Tax Parcel Number(s): Parcel #002433, 257- A 22

Acreage 0.615

Present Zoning District: OTR

Present Use of Property: Residential, Single Family Detached

Proposed Use for the Property Medical / General Office

Conditional Use Requested: Medical / General Office Code Section OTR

Is this request for an amendment to an existing Conditional (Special) Use Permit? No

Previous Conditional (Special) Use Permit Number/Resolution Number SUP03-11

**APPLICANT/CONTACT PERSON (Contract Purchaser if applicable)**

NAME: Kristen DeLack

ADDRESS: 409 Roanoke St E

PHONE: 281-794-5430 EMAIL: kristen24060@gmail.com

**PROPERTY OWNER(s)** (If property is held in an LLC or other corporation, names of all partners must be disclosed. Signatures may be obtained and submitted on a separate sheet if needed)

NAME: Kristen DeLack

ADDRESS: Same as above

PHONE: \_\_\_\_\_ EMAIL: \_\_\_\_\_

**ENGINEER/ARCHITECT (optional)**

NAME: Kristen DeLack, PE

ADDRESS: Same as above

PHONE: \_\_\_\_\_ EMAIL: \_\_\_\_\_

Please provide the following information - attach separate pages if necessary:

Description of the proposed use (or site modification)

The building will be used as medical/general offices for psychology and physical therapy practitioners. See attached detailed description.

Please demonstrate how the proposed use, when complemented with additional measures, if any, will be in harmony with the purposes of the specific district in which it will be placed.

The proposed use will be far better for the district than the only other viable use, student rental. See attached detailed description.

Please demonstrate how there will be no undue adverse impacts on the surrounding neighborhood in terms of public health, safety, or general welfare, and show the mitigation of impacts to achieve the goals.

The proposed use will mitigate the adverse impacts of having another student rental on the street. See attached detailed description.

Any modifications or exceptions to Use and Design Standards or Development Standards must also be requested at the time of CUP evaluation. Identify and provide a justification for modification/exception

I request that the application fee be waived and an expedited approval be granted. See attached additional exceptions.

If the application is an amendment to an existing approved S/CUP, provide an identification of any proposed changes requested below and on a plan, and a strike-through and italic edit of any conditions proposed to be changed

Previous SUP is expired. Otherwise, the only changes are for medical/general office from general office and removal of limits on operation hours.

## 409 Roanoke CUP Application Narrative

### Description of proposed use:

The site will be the new location for the Center for Creative Change. This business currently occupies 205 Washington Street in the OTR district and operates under Special Use Permit #01-006.

The Center for Creative Change is an out-patient clinic offering mental health care, therapeutic massage and body work services. The Center is overseen by Bridget Simmerman, LCSW (Licensed Clinical Social Worker) who screens all new practitioners coming into the practice. Each practitioner is independent, holding a sub-lease with Bridget and has agreed to terms of affiliation with the Center for Creative Change – which includes that each practitioner maintain their proper licensing and insurance for their professions, establish themselves on our website and register with the town of Blacksburg for business licensure.

When relocating to 409 E Roanoke Street we would plan for up to seven practice spaces (office rooms). Four on the second floor, and three on the first floor. We would establish the entrance behind the building, adjacent to the parking lot with a waiting room for clients/patients on the first floor. We anticipate up to five massage therapy practice rooms and two rooms for psychotherapists. For both massage therapy and psychotherapy practice interaction is generally one on one. In Bridget's current psychotherapy practice, she sees a small number of couples and occasionally a family together. Most sessions are 60 or 90 minutes. Sessions are scheduled as early as 8AM but rarely past 6PM. It is unusual to have more than ten cars parked at any given time. A vast majority of the therapists work Monday-Friday with occasional weekend appointments.

The CCC has been operating at 205 Washington Street for almost 19 years in a somewhat similar setting to the 409 E Roanoke Street property. We have been responsible neighbors and tenants, serving the Blacksburg community.

Contact information for the CCC is as follows:

Bridget A. Simmerman, LCSW  
www.bridgetsimmerman.com  
Center for Creative Change  
205A Washington Street  
Blacksburg, VA 24060  
(540) 961 5371  
(540) 301 6059 fax

### Harmony with Old Town Residential District:

The proposed use is consistent with the desire to maintain a small-town character, which typically includes small-scale offices located in historic houses. The site is a contributing structure in the historic district. It was used as a boarding house from the 1970's till 2003, briefly an art gallery, and an office building for 10 years.

Although, we have lived in the house for the last few years, no interior renovations have been done to make the building less suitable for an office building and more suitable as a family residence. The house still retains the features of the office building conversion: no bathtubs, small bathrooms, Ethernet/phone jacks in all rooms, many fire extinguishers, extremely small kitchen counters, three electric meters, etc.

The neighborhood suffers from increasingly poor student behavior, few owner-occupants and associated blight. Conditions have worsened every year. While we were able to get things quieted down when we moved in, this took a herculean amount of effort and a lot of time. The new trend of in-your-face drinking parties on front lawns is very disturbing and paints a bleak picture of what is to come. We are the last family living on this portion of Roanoke street.

The needed renovations to convert the building back into a single-family home are very expensive. The risk that the neighborhood continues to degrade is too great to make this investment at this time. My family is in the process of moving to another property that is more suitable for our current needs without extensive renovations.

There are only two viable alternatives for 409 Roanoke. Either it returns to being used for commercial purposes, or it becomes a student rental. If the latter, all the gains in student behavior we have achieved will be rapidly lost. The building will be eventually destroyed as a historic structure. Ultimately, the neighborhood will very likely continue its downward spiral into a college student party zone.

The CUP will allow us to rent the property to a business that not only will uphold community values, it will cherish and benefit from the historic nature of the house. The CCC has a long history in this community and has helped a tremendous number of people. The CCC will treat the property gently and honor its history. It will be worth maintaining the historic features and materials of the house, both inside and out. The CUP will also serve as a responsible anchor to help stabilize the neighborhood.

We are proposing to partially rent the building to the CCC. We will only change part of the building to medical office use. The attic efficiency apartment and basement storage area will continue to be used as they are currently (residential). This will allow my husband and I to maintain a connection to the house, ensuring it is cared for and maintained properly as a historic structure. Please note that we would make much more money renting the building to students. Our primary goal in with

this proposal is to preserve the property. If things do eventually turn around in the neighborhood, we will have the option of moving back into it.

Adverse effects mitigation:

I do not believe there are any adverse effects of the proposed use relative to the effects of renting the building to students. The property already has a 10-space parking lot. No street parking will be required. The additional traffic is insignificant compared to the traffic already on Roanoke street and probably similar to the student rental case. It will also preclude student parties which can result in blocking traffic.

Appropriate screening and buffer zones are already present with adjacent properties.

The proposed use is safer than a student rental. Student renters have a history of over occupancy, disabling smoke detectors, removing fire extinguishers, becoming intoxicated, falling off roofs, and starting bonfires in the back yard – despite clear rules to the contrary.

The CCC promotes mental and physical health. It teaches effective stress reduction strategies including yoga and meditation. The CCC increases the well being of the community.

Change of Use:

The building is already set-up for general office use due to its history for being used as such. No additional lighting will be installed. No additional modifications to the parking lot or driveways are envisioned. We will have the parking lot restriped to demark the individual parking spaces, including the handicap space. Repainting/restoration of the exterior with historically appropriate paint and colors will continue as weather allows. No other changes to the exterior are envisioned. The following is a discussion regarding the details for how the building codes are met with the existing facilities.

The maximum number of persons (staff and patients) occupying the building for business uses at any one time is expected to be 15. This occurs only a few times per year during workshop meetings conducted by the CCC.

The Virginia Existing Building Code recognizes that the current use of R-5 (single-family, detached) is the same hazard category as B (business). No changes to the building are required for fire safety or egress (VEBC 705.4). Chapter 10 of the VCC egress calculations:

- Occupant load:  $3000 \text{ sq ft} / 100 \text{ (business areas)} = 30 \text{ persons}$ . Note, expected peak load is 15.

- Minimum stairway width:  $0.3"/\text{person} \times 30 = 9"$ , however, 36" is minimum for occupant load less than 50 in VCC 1011.2. Note, not all 30 will be on the second floor. Available minimum stairway width is 39". **OK.**
- Minimum corridor width: 36" (occupant load <50). Available min width is 45". **OK.**
- Max occupancy load for one exit doorway: 50 (Table 1006.2.1). Greater than 30. **OK.** There are 3 exit doorways, so we have a lot of excess capacity.
- Max egress travel distance allowed: 100 ft (Table 1006.2.1). Max path from furthest office on second floor to exit is 45 ft. Exit path from attic apartment is 70 ft. **OK.** Note, most exit paths are much shorter.
- Note, all practice spaces have windows that exit near to ground level or onto relatively flat roof areas. Attic apartment has available chain ladder for emergency access to porch roof. This further reduces life safety risk.

Fire sprinklers are not required by the VCC, Chapter 9. The height is acceptable for construction type VB business structures (VEBC 706.4) since the relative hazard category is the same. Commercial smoke alarms are not required with the low number of occupants proposed (<100 persons, VCC 907.2.2).

We propose that only the ground and second floors be used for the business. The attic and basement will not be included in the lease, though the occupancies will not be physically separated. Note that even though the individual practitioners operate independently, they are not separated from the rest of the occupancy. It is typical of the medical industry for each practitioner to bill, maintain his or her own insurance, and hold separate licenses, but come together under one umbrella to purpose of economically establishing an office location.

The code does not require any accessibility upgrades since only part of the building will change occupancy classification (Ref. VEBC 402.2). Existing grand stairway handrails and guards shall be accepted based on the historic designation of the structure (VEBC 904.9).

#### Bathroom capacity:

A question was raised during the pre-application meeting regarding enough bathroom capacity for the business use. OSHA (1915.88(d)(2)) requires one unisex bathroom with locking door for 15 people. Up to 35 people can be served by two bathrooms. We currently have two bathrooms (one per floor) available to the business plus a dedicated bathroom in the attic apartment. The maximum occupancy expected for the CCC is 15. Even assuming a standard occupancy of 30 (one person per 100 sqft), we still have enough bathroom capacity for the business.

Parking development standards:

As a mixed use development, the required number of parking spaces is determined by dividing the office square footage by 400 and adding two spaces per residential bedroom

$$3000 \text{ sqft} / 400 = 7.5 \text{ spaces} + 2 \text{ spaces (efficiency apartment)} = 9.5 \text{ spaces}$$

Currently, we have 10 parking spaces available. This minimum number of parking spots is met.

Note that a dedicated (not mixed use) medical office use requires one space per 200 sqft. This would be 15 spaces for 3000 sqft. I believe that this grossly overestimates the number of spaces this business requires for the following reasons:

- The CCC currently has only 10 allocated spaces. They report no problems with parking shortage over the last two decades.
- Roanoke street has bicycle lanes, is walkable to downtown, and has bus stops adjacent to the building. Some practitioners and visitors will elect not to drive a car.
- Appointments for each practitioner do not run back to back. Rest is needed between sessions and this means that fewer patients will be on the property at the same time.
- Roanoke street parking has seasonal availability. Most or all of it is available during summers and when VT is not in session.
- The property is only two blocks from the Town's proposed future parking structure on Jackson and Progress street.
- We propose to monitor the parking availability and only pave over more grass and remove more trees if an acute need materializes. We have plenty of land for additional surface parking, if needed in the future.

The development standards express a desire to have dedicated pedestrian walkways between the parking area and the building. Due to the layout of our parking lot, little would be gained by paving additional sidewalks. Our driveway gates and residential character provide significant traffic calming. Traffic is expected to be very light due to low occupancy load. Stepping stones are available between the parking lot and the back patio and people have the option of walking on the grass to get to the entry way. Paving over more grass and possibly losing a mature tree and landscaping would be a greater harm. I believe that this meets the spirit of the standards. We will monitor this and take any action needed in the future.

We propose to close the driveway gates at Jackson street after business hours. We will also post do-not-enter signs at Jackson street and paint a distinct arrow in the direction of traffic flow. This will minimize traffic after hours and reduce cut-through traffic from Jackson street.

We have an existing wave-type bike rack with a rated capacity of 5 bikes. This type of rack is currently successfully used in some of Blacksburg's finest developments such as Kent Square and the Va Tech CRC. The Blacksburg development standards were updated at some point to require even more luxurious inverted U-type racks. We propose that our existing bike-rack be accepted as-is. We will monitor the bike rack use and add additional inverted U-type racks in the future if there are issues.

Business hours:

Ordinarily, a CUP will limit business hours to reduce impact to the neighborhood. In this case, the CCC will be a calming and stabilizing influence in the neighborhood. Extended business hours should be encouraged to help keep blow-out parties at surrounding fraternities and student rentals in check by having mature adults available to report problems to police and other authorities.

We have several lights that will operate on timers to create the appearance of occupancy throughout the building after hours. We also have 7 security cameras strategically placed on the outside of the building.

Requested exceptions to development standards:

We would like to request the following exceptions to development standards:

- Accept existing wave-type bike rack instead of inverted-U type racks that are currently required in the standards. Wave-type racks are common in some of Blacksburg's most successful developments. We will monitor the bike rack use and add additional inverted U-type racks in the future if there are issues.
- Accept existing parking lot to entrance walkway provisions. Refer to discussion, above.

Additional information:

Refer to CCC CUP slides for pictures, illustrations, and additional information.

## Required information from CUP form

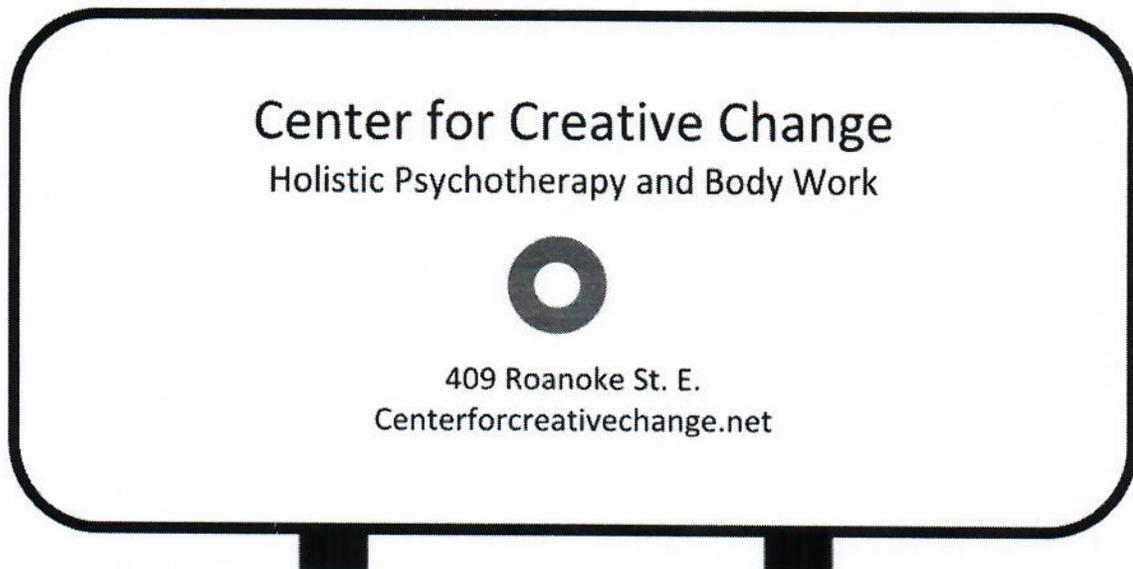
1) Consent of property owner:

I consent to this CUP application for 409 Roanoke St. E.



Signed: Kristen DeLack, property owner

- 2) Site plan – see attached
- 3) Stormwater Management Concept Plan – no changes to property are proposed. No plan required.
- 4) Building elevations for new construction or changes – No new construction or changes are proposed.
- 5) Sketch depicting any proposed signage – See below sketch for 2ft tall x 3ft wide painted wood sign for front of house. Will be mounted to house siding under front porch to right of front door.



- 6) Vicinity map – see attached site plan.
- 7) Completed VDOT527 form – see attached.
- 8) List of adjacent property owners – see below.

All of the adjacent properties are rented. Note that the contact address is different from the physical address. Also note, applicant owns the two adjacent vacant lots at the back of the property.

Owner: ZETA HOUSE CORP OF LAMBDE CHI ALPHA  
Owner: C/O MICHAEL WHALEY  
Use: Student rental, currently rented to an un-recognized fraternity.  
Site Address: 413 ROANOKE ST  
Community: BLACKSBURG  
Mailing Address: 1971 GREENBRIER CIR  
Postal Community: BLACKSBURG VA 24060

Owner: BRAATEN ELLEN  
Owner: BUSSARD FRANCES ANN  
Use: Rental house, currently rented to grad students  
Site Address: 405 ROANOKE ST  
Community: BLACKSBURG  
Mailing Address: 702 YORK DR  
Postal Community: BLACKSBURG VA 24060

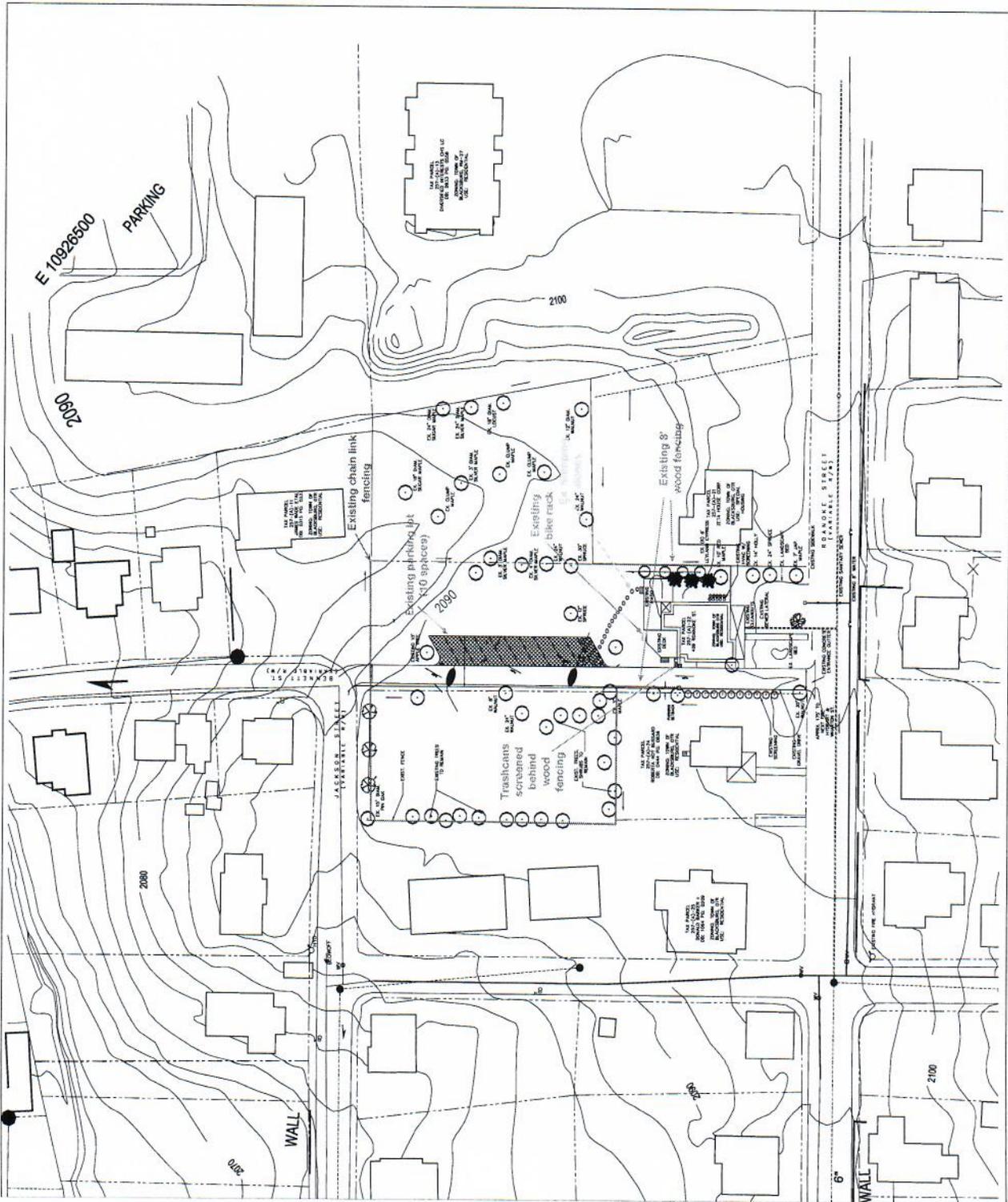
Owner: VIRGINIA ZETA HOUSE CORP  
Owner: C/G GARY JONES  
Use: Student rental, currently rented to a fraternity  
Site Address: 420 E ROANOKE ST  
Community: BLACKSBURG  
Mailing Address: 7505 COLONEL WEAVERS CT  
Postal Community: MANASSAS VA 20111

Owner: GILBARTE KEVIN K  
Use: Unoccupied. Being renovated for student rental  
Site Address: 404 ROANOKE ST  
Community: BLACKSBURG  
Mailing Address: P O BOX 6  
Postal Community: NEWPORT VA 24128

Possibly adjacent to back of the property at Jackson/Bennett st, included for completeness:

Owner: WADE JAMES C  
Owner: WADE BARBARA D  
Site Address: 201 BENNETT ST  
Community: BLACKSBURG  
Mailing Address: 201 BENNETT ST  
Postal Community: BLACKSBURG VA 24060

- 9) Fee for public hearing sign posting - Applicant will be happy to put up the sign and not have to pay this fee.
- 10) Application fee - Fee of \$500 + 5 x \$3.35 (postage) = \$516.75 is attached.
- 11) Pre-submittal meeting occurred December 2019.
- 12) Proof of tax payment. All real estate taxes are paid up to date. Please advise what constitutes proof (can the Town just look in their records?) and applicant will provide it prior to issuance of final approval.
- 13) Disclosure of equitable ownership - Property is held by, Kristen DeLack.
- 14) Digital copies - Provided at time of submittal.



Center for Creative Change (CCC)  
 Conditional Use Permit Application

Site Plan

409 Roanoke St  
 KMD 1/23/2020

January 1, 2012

<b>OFFICE USE ONLY</b>	
Date Received:	_____
RZN#	_____
CUP#	_____

**TOWN OF BLACKSBURG**  
**VDOT TRAFFIC IMPACT ANALYSIS (TIA) SUPPLEMENTAL APPLICATION**

*This application, appropriate fee, and accompanying documentation must be submitted in conjunction with the corresponding rezoning, conditional use permit, or comprehensive plan amendment before any application can be reviewed by staff. If you have any questions, please contact the Planning and Building Department.*

Name of Development: Center for Creative Change  
 Address/Location: 409 Roanoke ST E, Blacksburg, 24060  
 Tax Map Parcel: 257-A22  
 Size of Site: 0.61 Acres  
 Proposed Use: Medical / general office  
 Current Zoning District: OTR  
 Existing Future Land Use Classification: med density Residential

This application is submitted in conjunction with a

- Rezoning Application. Proposed Zoning District: \_\_\_\_\_  
 Conditional Use Permit Application. Proposed Conditional Use: medical / general office  
 Comprehensive Plan Amendment. Proposed Future Land Use: \_\_\_\_\_

This is the  first,  second,  third or subsequent submission of the TIA for review by VDOT.

A traffic impact analysis  is  is not required for the proposed project:

- Yes or  No, the site is located 0 feet along the vehicle path of traffic which is less than 3,000 feet from VDOT maintained roadways, or is within 3,000 feet of a non-limited access state controlled highway, or is within 3,000 feet of a connection to a state limited access highway.
- If the answer to question #1 is Yes, complete the following:
  - Yes or  No, the proposed development generates 20 vpd which is greater than the VDOT requirement of 5,000 vehicles per day.
- Yes or  No, the proposed comprehensive plan amendment results in substantial impact of 5,000 additional vehicle trips per day or results in substantial changes to the existing transportation network and infrastructure of state controlled highways.
- No, a new TIA study is not required because a previously submitted TIA is still applicable for the project site. (Note: the appropriate documentation must be attached to this application)
- Yes or  No, a VDOT Scope of work meeting has been held.

If a TIA is required, please provide the following information:

Name of Property Owner(s): \_\_\_\_\_  
 Address: \_\_\_\_\_  
 Phone: \_\_\_\_\_ Fax: \_\_\_\_\_  
 Email address: \_\_\_\_\_

**Applicant to whom review comments will be sent:** \_\_\_\_\_  
Address: \_\_\_\_\_  
Phone: \_\_\_\_\_ Fax: \_\_\_\_\_  
Email address: \_\_\_\_\_

**Project Engineer who prepared TIA (if different from applicant):** \_\_\_\_\_  
Address: \_\_\_\_\_  
Phone: \_\_\_\_\_ Fax: \_\_\_\_\_  
Email address: \_\_\_\_\_

**Please check all applicable boxes of information submitted with this application:**

1. **Review Fee Check made payable to VDOT for**  
*First, Second or Third review by VDOT*

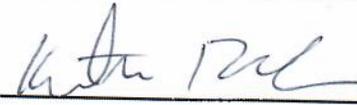
- Rezoning or Conditional Use Permit request
  - Low volume road submission 24VAC30-155-40 A 3: \$250
  - All other submissions: \$1000
- Comprehensive Plan Amendments: \$1000

2. **For the Town of Blacksburg, please provide a digital submission of the following:**

- a.  **One signed copy** of the Town's VDOT Supplemental TIA application.
- b.  **One complete copy** of the TIA submitted to VDOT including a completed checklist of information and signed scope of work meeting agreement.
- c.  **One copy** of the VDOT review fee check.
- d.  **One copy** of letter and supporting information documenting why a new or updated TIA is not required for this project.

3.  **For VDOT, three paper copies** of the complete Traffic Impact Analysis. Forms and additional information can be found at <http://www.virginiadot.org/projects/chapter527/default.asp>

**By signing below, I acknowledge that all information on this application and included in the supporting documentation is correct and accurate, and has been prepared by an appropriate licensed professional.**

SIGNATURE OF APPLICANT:  Date: 1/22/2020

**For Staff Use Only:**

First Submission  Second Submission  Third or Subsequent Submission

Reviewed and Accepted as complete by \_\_\_\_\_ Date \_\_\_\_\_

TIA forwarded to VDOT by \_\_\_\_\_ Date \_\_\_\_\_

Rejected by \_\_\_\_\_ Date \_\_\_\_\_

Reason for rejection: \_\_\_\_\_

Town of Blacksburg, Planning & Building Department  
300 South Main Street • PO Box 90003, Blacksburg, VA 24060-9003  
Phone: (540) 951-1126 • Fax: (540) 951-0672 • [www.blacksburg.gov](http://www.blacksburg.gov)

## Medical-Dental Office Building (720)

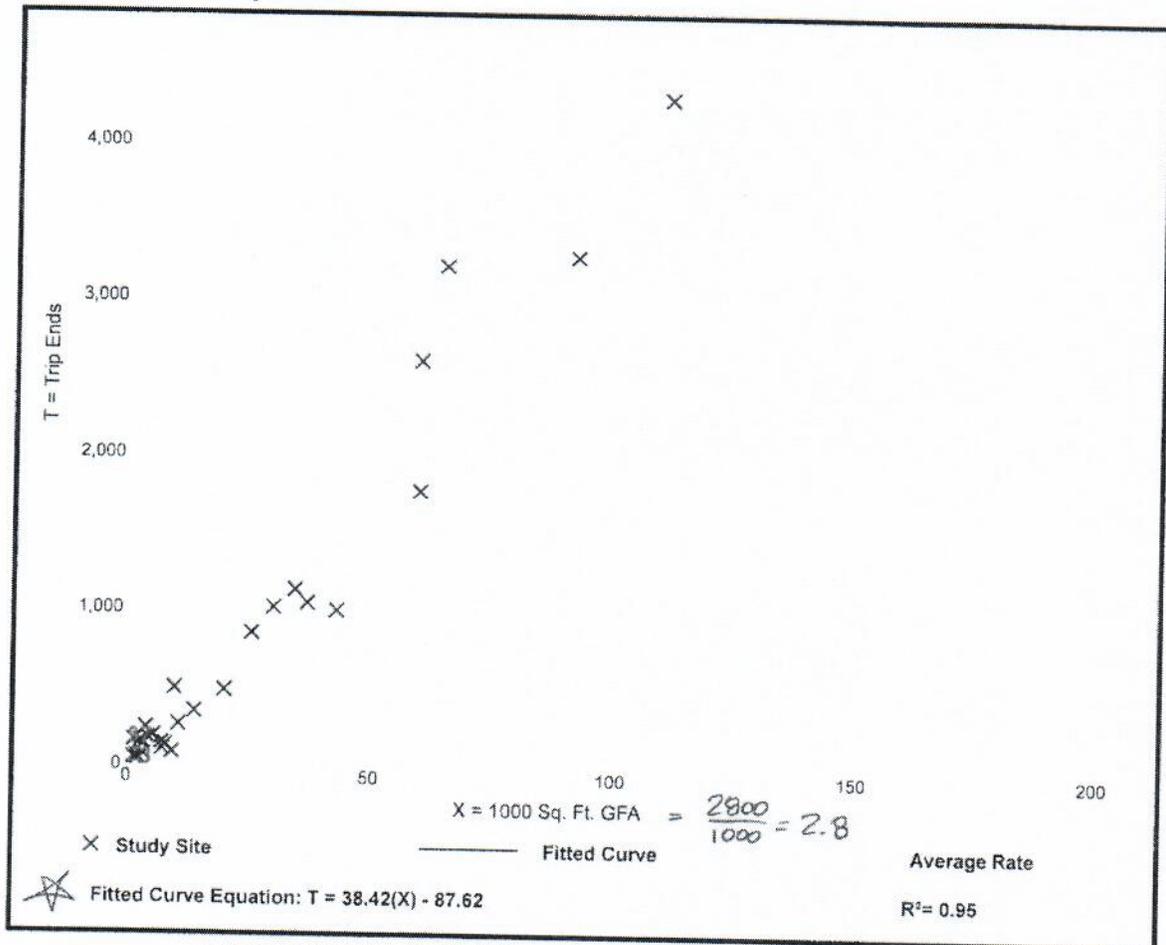
**Vehicle Trip Ends vs: 1000 Sq. Ft. GFA**  
**On a: Weekday**

**Setting/Location: General Urban/Suburban**  
Number of Studies: 28  
Avg. 1000 Sq. Ft. GFA: 24  
Directional Distribution: 50% entering, 50% exiting

### Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
34.80	9.14 - 100.75	9.79

### Data Plot and Equation



$T = 38.42(2.8) - 87.62 = 19.96 = \underline{20 \text{ trip ends}}$

10 IN  
10 OUT