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Department of Planning & Zoning
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Zoning Evaluation Division

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Regina C. Coyle
Zoning Evaluation Division
Fairfax County Department of Planning and Zoning
12055 Government Center Parkway, Suite 801
Fairfax, Virginia 22035

Re: Application for Rezoning to the PTC District
Georgelas Group LLC (the "Applicant")
Tax Map 29-3 ((1)) 48D, 53, 53A, 54A, 57, 57A, 57B, 57H, 57J, 60C, 63C and
to- be-vacated/abandoned street right-of-way (the "Application Property")

Dear Ms. Coyle:

This letter serves as a statement of justification for a rezoning application affecting a consolidation of approximately 28.32 acres of property in the Tysons West area of Fairfax County. The Applicant, Georgelas Group LLC, previously submitted the Application Property for review as the Tysons Demonstration Project and has worked diligently with County Staff, the Tysons Committee and the Planning Commission over the past 11 months to develop a mixed-use, transit oriented community that will create a new urban form in Tysons and truly celebrate Metrorail. Georgelas Group LLC now seeks a rezoning of the Application Property from the C-4, C-7, I-5, HC and SC Districts to the Planned Tysons Corner ("PTC"), HC and SC Districts and approval of a Conceptual development Plan ("CDP") in order create an exciting and efficient, pedestrian-friendly and transit oriented development in keeping with the vision set forth in the new Comprehensive Plan for Tysons.

Application Property Area

The Application Property includes eleven individual parcels as well as 1,575 square feet of right-of-way proposed to be vacated and abandoned, for a total of 28.32546 acres. In addition, areas previously dedicated for right-of-ways with reserved density credit total 15,983 square feet bringing the total land area for density/intensity calculations to 28.69238 acres. The Application Property, which is referred to as Spring Hill Station, has been organized into six areas identified as A-F. The areas include:

Area	Tax Map ID	Acreage	Zoning	Existing Use
A	29-3 ((1)) 53	3.08453	C-7, HC, SC	Auto Sales
	29-3 ((1)) 53A	0.53329	C-7, HC, SC	Auto Sales
	29-3 ((1)) 57A	0.62316	I-5, HC	Office
	29-3 ((1)) 57H	2.95597	I-5,HC	Auto Sales/Repair
	29-3 ((1)) 57J	0.06765	I-5, HC	Auto Sales
	Right-of-Way	0.03616		
B	29-3 ((1)) 54A	3.51848	C-7, HC, SC	Auto Sales/Storage
C	29-3 ((1)) 57	0.46993	I-5, HC	Mini Warehouse
	29-3 ((1)) 57B	2.57551	I-5, HC	Fire Station
D	29-3 ((1)) 60C	5.50627	I-5	Industrial/Service
E	29-3 ((1)) 63C	7.39289	C-4, HC	Office
F	29-3 ((1)) 48D	1.56162	I-5, HC	Parking
TOTAL		28.32546		

The parcels, while not all contiguous, allow for the creation and development of three neighborhoods which offer excellent opportunities for establishing a connected grid of streets, providing an integrated open space/urban park network as well as public facilities.

- Neighborhood I includes Areas A, B and C and is located at the northern entrance to the future Tysons West Metro station. It includes 14.05 acres of land and has frontage on Leesburg Pike, Tyco Road and Spring Hill Road. This neighborhood is currently zoned a mixture of C-7 and I-5. It is developed with two car dealerships, a 32,879 square foot office building, Fairfax County Fire Station 29, and a mini-storage warehouse establishment.

This entire neighborhood is located within 1/8 mile of the station entrance. It offers the best opportunity for interfacing with transit, establishing a “sense of place” for Tysons West, and acting as a catalyst for redevelopment from a suburban industrial area to a vibrant transit-oriented urban center.

- Neighborhood II, located in the southeast quadrant of the intersection of Spring Hill Road and Greensboro Drive, is comprised of Areas E and F. It is a total 8.95 acres in size and zoned C-4 and I-5. This neighborhood includes two existing Class A office buildings totaling 427,098 square feet which will remain, but also provides the ability to add buildings, uses and important street connections to create greater synergy in this area. The majority of this neighborhood is within 1/4 mile of the station entrance; 97,500 square feet are located between 1/4 and 1/3 mile from the station.
- Neighborhood III includes Area D and is located between Spring Hill Road and Tyco Road directly opposite Greensboro Drive. As such, it can help provide the vital extension of Greensboro Drive and establish a block pattern for a mixed-use neighborhood. Neighborhood III is 5.50 acres in

size and is zoned I-5. It is developed with a multi-tenant industrial building of 150,625 square feet. Most of the neighborhood falls within $\frac{1}{4}$ mile of the station; with 67,507 square feet located between $\frac{1}{4}$ and $\frac{1}{3}$ mile of the station.

Program of Development

Spring Hill Station is an area with considerable redevelopment potential, largely because for the most part it is developed with relatively low intensity buildings. However, the major stimulus for redevelopment is the opportunity for high intensity development based on proximity to the Tysons West Metrorail station.

The CDP submitted with this application proposes a maximum of 6,020,663 gross square feet ("GSF") over the three neighborhoods for an overall floor area ration ("FAR") of 4.82. The CDP shows two options; Option 1 provides for slightly more office use and Option 2 allows slightly more residential use. The overall land use mix under Option 1 is approximately 54% office, 35% residential, 8% hotel, and 3% retail and service uses. Under Option 2, the overall mix is approximately 48.5% office, 41% residential, 7.5% hotel, and 3% retail and service uses. Specific details and alternate designs are provided on the CDP, but the general program for each neighborhood is described below.

Neighborhood I is the hub of the transit station area. Overtime all the existing structures will be removed and replaced with eight new buildings oriented to existing and new streets, the metro station entrance and a large adjacent public plaza. A new street, referenced on the CDP as Condominium Avenue, will be constructed from Spring Hill Road along Neighborhood I's northeastern boundary. Retail Circle will be a second new street connecting Condominium Avenue with Tyco Road. It is envisioned that Retail Circle will be a lively pedestrian friendly street with retail storefronts, café's and restaurants, but will also provide vehicle access to an additional local street and private alleys which provide access to the parking garages serving Neighborhood I.

The Tysons West Metro station entrance will be located on the Application Property near the corner of Leesburg Pike and Spring Hill Road. Adjacent to the station entrance, a large public plaza/civic park is proposed extending through Neighborhood I connecting Leesburg Pike with proposed Merchant Avenue to the north. The plaza/civic park will be the focal feature of Neighborhood I and will offer specialty paving, landscaping, water features, public art, outdoor seating, café seating, specialty lighting and the potential for outdoor entertainment. A portion of the plaza will be covered by a roof-top pavilion structure providing a winter garden effect. The plaza will be flanked by four buildings identified as A-1, A-2, A-3 and A-4. Building A-1 immediately to the west of the station entrance and plaza is the largest building in Spring Hill Station with approximately 592,000 GSF of office and support retail/service uses. This iconic building will be a maximum of 360 feet in height. Office Building A-2 will include ground floor retail and service uses and will also house the permanent kiss-and-ride facility serving the Tysons West station. Building A-3 located north of Retail Circle and west of the civic park is proposed as a residential tower of approximately 440,000 GSF. A hotel will occupy Building A-4.

Along the western edge of Neighborhood I, office Building B-1 will complete the Leesburg Pike frontage with approximately 431,980 GSF of office use as well as additional retail/service uses. To the north across Retail Circle, Building B-2 is planned as a residential structure. On the east side of Neighborhood I along Condominium Avenue and Spring Hill Road, Buildings C-1 and C-2 are situated. Building C-1 is proposed as an office building with support retail and service uses. Residential uses and support uses are envisioned for C-2.

Throughout Neighborhood I, parking is provided primarily in structures with on-street parking along Retail Circle and Condominium Avenue. Parking garages are provided between buildings A-1 and B-1; A-2 and C-1; B-2 and A-3; and A-4 and C-2. Where visible from adjacent streets, retail and service use storefronts are incorporated in to the garage design. The top level of each of these parking structures has been designed as functional open space and park land. Two public sky parks are proposed on the top level of garages serving office use and are detailed in the CDP. The West Sky Park is located between A-1 and C-1 and is designed with large lawn panels to accommodate activities such as bocce, croquet and volleyball as well as hosting outdoor movies and live entertainment. A series of outdoor rooms along the edge of the sky park allow for more intimate settings for uses such as board games, seating and picnicking. Located between A-2 and C-1, the East Sky Park incorporates play areas for children, outdoor café seating and lounge chairs. Both public sky parks will be accessible to the general public and will be signed and programmed to encourage public use. Private sky parks are proposed to serve the residential and hotel uses north of Retail Circle and will include such amenities as swimming pools, seating for passive use, and specialty landscaping.

To accommodate the proposed redevelopment of Neighborhood I, two existing public facilities require special consideration. Existing Fire Station 29 will be relocated from Neighborhood I to a new, larger facility to be constructed on Tyco Road in Neighborhood III. The existing Dominion Power transmission line which runs through Neighborhood I just west of the fire station and then crosses Leesburg Pike needs adjustment. The height of this power line was raised recently to accommodate the elevated Metrorail line. While placing this line underground would be ideal, after much analysis and discussion with Dominion Power, it has been concluded that the cost is prohibitive. The Applicant proposes to relocate the overhead line along Condominium Avenue and Spring Hill Road. An alternative design of retaining the line in its current location is also provided in the CDP.

Overall development proposed in Neighborhood I totals 3,126,263 GSF with a mix is approximately 55% office, 33% residential, 8% hotel, and 4% retail and service uses.

Neighborhood II includes two existing office buildings known as Greensboro Corporate Center. Identified as Buildings E-1 and E-2 on the CDP, Greensboro Corporate Center will remain as the rest of the neighborhood is redeveloped with three new buildings. A new street, a continuation of Condominium Avenue, will be constructed generally through the southern portion of Neighborhood II. An existing driveway providing access to Buildings E-1 and E-2 from Greensboro Drive will be extended to form a new local street that will ultimately connect with Condominium Avenue. Building E-3 is a new office building proposed for the northeast quadrant of the intersection of Spring Hill Road and Condominium Avenue. This building

includes a retail component along Spring Hill designed to abut and mask the existing parking garage. Storefronts facing Spring Hill Road will transform the streetscape and provide a pleasant walking environment for pedestrians accessing the Metrorail station. A major plaza planned adjacent to Building E-3 will provide additional pedestrian amenities and will connect with existing open space areas serving Greensboro Corporate Center. Located in the eastern portion of Neighborhood II, Building E-4 is planned for residential use. Two options are provided for Building F-1 located south of Condominium Avenue. Option 1 proposes an office building of approximately 229,388 square feet while Option 2 includes a residential tower of 426,000 square feet.

Overall development proposed in Neighborhood II totals 1,292,188 GSF under Option 1. The Option 1 land use mix is approximately 83% office, 15.5% residential, and 1.5% retail and service uses. With Option 2, Neighborhood II development totals 1,488,800 GSF and has a resultant land use mix of approximately 57% office, 42% residential, and 1% retail and service uses.

Neighborhood III has been designed around the proposed extension of Greensboro Drive through Neighborhood III providing an important connection between Spring Hill Road and Tyco Road. The existing industrial building will be removed and five new buildings constructed. All buildings will be on the north side of Greensboro. Two residential towers are proposed for the eastern portion of Neighborhood III. With an estimated 1200 dwelling units, this former industrial area will be transformed in to a new residential neighborhood. First floor retail opportunities and an expansive entry plaza will create a lively streetscape along Greensboro. A sky park will provide space for private outdoor recreational opportunities for the residents. To the west, a new local street is proposed and designed to ultimately connect Greensboro Drive with Spring Hill Road. The new block formed by Tyco Road, Greensboro Drive and the new local street will include an approximate 200,000 square foot hotel (Building D-3), a 350,000 square foot office building plus retail and service uses. Again outdoor amenities for the hotel and office uses will be provided in a private sky park above a parking structure. Fire Station 29 will be relocated to this block as well. The new station is proposed off of Tyco Road in the north western portion of Neighborhood III (Building D-5). Access to the new station will be from Tyco Road and from the new local street. A public park will occupy the portion of Neighborhood III south of Greensboro and will offer an open lawn panel, a children's play area, a pergola or similar garden structure as well as walkways, benches, and landscaping.

Proposed development in Neighborhood III includes 1,405,600 GSF with a land use mix is approximately 25% office, 60% residential, 14% hotel, and 1% retail and service uses.

Phasing of Development

The Application Property with 28.32 acres and more than 6,000,000 GFA will, even in the best of economic times, take years perhaps decades to complete. Phasing of development with key infrastructure components is an intricate process; flexibility is needed. While it is not possible at this time to definitively determine which building will be built first or second, it is possible to identify what infrastructure, parking, public facilities and parks will be built with

each building. This has been graphically portrayed in the CDP. One possible scenario is described below.

Phase 1 will focus on the transit station area in Neighborhood I. The first building to be built will likely be Building A-1 which is located to the west of the station entrance as shown on the CDP. Building A-1 is planned as the tallest and largest office building in this area, and will include ground floor retail and service uses. In this same phase, the Metro elevators and escalators will be constructed and the kiss and ride parking lot will be installed as a surface facility. At this time, the kiss and ride area will be located between the escalators and the existing office building on Parcel 57A. In order to serve these uses, it is expected that a portion of Condominium Avenue would be built as well as the large section of Retail Circle and the service street to the west of Building A-1. This will provide two access points, one from Spring Hill Road and one from Route 7. The fire station could continue to function in its existing location.

Various options are possible for Phase 2. One option would be to construct Building A-2, currently planned as an office building with ground floor retail and service uses, but potentially could become a residential use. Construction of this building would temporarily displace the kiss and ride lot to another surface location within Neighborhood I. The kiss and ride facility would be permanently located in the lower level of Building A-2. With this option, the plaza/pavilion area adjacent to the station escalators between Route 7 and Retail Circle would be constructed. Another option would be to construct Building B-1 at the corner of Route 7 and Tyco Road. This is currently planned as an office building with ground floor retail and service uses. With the construction of Building B-1, Retail Circle would be constructed to Tyco Road and improvements to Tyco Road would be made. The kiss and ride lot and fire station would continue to operate as described in Phase 1.

It is anticipated that there will be numerous future phases. Both Neighborhoods II and III include substantial existing buildings. For Neighborhood II, new buildings will be built on the periphery and Condominium Avenue will be constructed with either the construction of Buildings E-3 or F-1. The development of Neighborhood III will require the removal of a large, productive building. It is anticipated that the redevelopment will include the construction of Greensboro Drive along the interim alignment with construction of either Buildings D-2 or D-3.

Comprehensive Plan Guidance

The Application Property is located in the Tysons West District of Tysons Corner Urban Center and recommendations for its use and development are guided by the newly approved Plan Amendment for *Transforming Tysons* (the "Plan"). Guidance is provided in both the areawide recommendations and in the more site specific Tysons West - North Subdistrict recommendations. The Plan recommends that Neighborhood I and most of Neighborhood II be developed in keeping with Transit Mixed-Use land use category. This category is described as a balanced mix of retail, office, arts/civic, hotel, and residential uses, with office comprising approximately 65% and residential comprising 20% or more of the total development throughout all Transit Mixed-Use areas. Neighborhood III and a small portion of Neighborhood II are planned for Residential Mixed-Use which is described as primarily residential (on the order of

75%) with a mix of other uses such as office, hotel, arts/civic, and supporting retail and services. The Conceptual Land Use Pattern Map in the Plan also includes recommendations for Parks/Open Space on the Application Property.

Planned intensity recommendations are based on a tiered approach. Most of Spring Hill Station is located in Tiers 1 and 2 which encompass all land within ¼ mile of a proposed Metro Station entrance. Sites within Tiers 1 and 2 are not subject to a maximum FAR, however, office use in Tiers 1 and 2 in excess of 2.5 FAR requires approval of a special exception or granting of bonus intensity. Approximately 13% of the Application Property is located in Tier 3, specifically between ¼ and ½ mile of the station entrance. The Plan recommends Tier 3 for a 2.0 FAR, and for all residential projects within ¼ and ½ mile the potential for up to 3.0 FAR, including bonuses.

The proposed rezoning is in keeping with the recommendations of the Plan. The maximum overall FAR of 4.82 includes an office FAR of 2.51 with Option 1 and 2.34 with Option 2. Flexibility to permit additional residential uses in lieu of office and hotel uses is also proposed. The Applicant requests a public facility bonus of 100,614 square feet with Option 1, the justification for which is outlined later in this letter. The mix as described above and set forth in the tabulations on the CDP is approximately 54% office, 35% residential, 8% hotel, and 3% retail and service uses with Option 1 and approximately 48.5% office, 41% residential, 7.5% hotel, and 3% retail and service uses under Option 2.

The Plan also provides guidance on consolidation, street grid, urban design, urban park standards and a host of other topics. Below is a description of how the proposed rezoning of the Application Property meets the major elements of the Plan and the specific subdistrict recommendations. Where the description of compliance with the major elements also satisfies the subdistrict recommendations, it is so noted and not repeated.

Major Elements of the Plan

- Mix and arrangement of uses

The proposed mix of uses is in keeping with overall guidance in the Land Use section and the North Subdistrict description. Overall there is a slight predominance of office use (48.5 – 54%) and a strong component of residential uses (35 - 41%). Hotel and retail/services uses are also provided. Retail, service and eating establishments are provided along most streetscapes to create a lively pedestrian environment. Office uses are located closest to the Metro station and along Leesburg Pike and Spring Hill Road. Residential uses are provided slightly further from the station and in more protected areas to create a quality living environment. Parking is provided primarily in structures and sited and treated to be an attractive element.

- Affordable and workforce housing

The proposed development provides the full complement of affordable and workforce housing as recommended in the Plan. The proffers will detail both the residential component and the commercial contribution.

- Green building expectations

All office building will be designed and constructed to meet a minimum of LEED Silver certification; all residential structures will be designed and constructed to meet a minimum of LEED certification or certification under the LEED for Homes new pilot program.

- Stormwater management

The goal of stormwater management measures for the Application Property is to protect the downstream receiving waters in the Tysons Corner area from further degradation while providing sufficient controls to proportionally improve the condition of said receiving waters. Through the use of aggressive and innovative stormwater management planning and techniques, the subject rezoning area will provide both water quantity and water quality controls to achieve the above-stated goal.

It is the intent of this application to commit to a stormwater management plan which not only attempts to mimic the predeveloped peak release rates, but also the pre-developed runoff volumes. In order to both control the post-developed peak flow rates and reduce the post-developed runoff volumes, it is the intent of the stormwater management plan to make use of certain low impact development (LID) techniques that will aid in water runoff reduction and reuse, such as:

-Green roofs will allow for a portion of the runoff volume to be decreased through the uptake by plantings on the green roof.

-Tree box filters will also allow for a degree of plant uptake, and can also be designed to infiltrate portions of the runoff volume, depending on the characteristics of the insitu soils.

-Previous hardscapes/streetscapes will allow for infiltration of portions of the runoff volume through the previous surface into storage below where it will be held for infiltration into the ground, depending on the characteristics of the insitu soils.

-Stormwater reuse will allow for runoff volume to be recycled into the water supply of the new buildings for allowable purposes such as grey water, landscape irrigation, and air conditioning unit cooling. So, instead of merely holding runoff to reduce its peak flow rate, detention vaults on a

site which as stormwater reuse can hold runoff until it is reused in the buildings. This reuse has the added benefit of reducing the demand on the domestic water supply, while infiltration techniques will have the added benefit of recharging the surrounding water table.

- Consolidation performance objectives

The subdistrict guidance suggests a consolidation goal of 20 acres with properties located in both Tiers 1 and 2. The Application Property includes 11 parcels with more than 28 acres. This large area includes property in Tiers 1, 2 and 3. The size and situation of the Application Property allows attainment of the performance objectives of developing an efficiently functioning community, creating a grid of streets and public open space system, integrating with and facilitating the redevelopment of adjacent land in keeping with the Plan, and permitting redevelopment in several phases

- Transportation

- Grid of streets on and off-site

The Applicant has worked with many of the property owners in the Tysons West area from Springhill Road to the Dulles Toll Road to develop a grid of streets to provide accessibility and connectivity for the area. In doing so, it has attempted to create a grid that is both effective and achievable. We have also worked with Fairfax County Department of Transportation (FCDOT) to refine the grid and have included the grid in the CDP. It includes an important extension of Greensboro Drive, but also includes construction of portions of several other new streets, including Condominium Avenue, Retail Circle, and Merchants Avenue. These along with the other more local streets and private alleys proposed with this project make major advances in creating a grid of streets in the near future.

- Vehicle trip reduction objectives

The Traffic Impact Statement ("TIA"), prepared by Wells + Associates, Inc. and submitted with the application includes a Transportation Demand Management ("TDM") vehicle trip reduction goal of 35% for residential uses and a 30% reduction for office and hotels uses in Neighborhood I. For Neighborhood II and III, a 30% TDM reduction was taken for residential uses and a 25% reduction for office and hotel uses. These reduction objectives were determined with FCDOT and VDOT per the scoping agreement. Future proffers will further detail the objectives and comprehensive TDM program.

- Parking management

Parking management is very important to the success of a TDM program. The Applicant proposes to develop parking in phases with the early phases providing parking in excess of that set forth in the Plan and the PTC District regulations, but will, with the later phases, provide less parking so that by build-out of the Application Property total parking provided is at or below the maximum permitted. This is detailed on the CDP. The location, access and cost of parking will all be important aspects to include in the Applicant's TDM program

- Phasing to transportation improvements and programs

The CDP provides several sheets outlining the potential phasing of development to planned transportation improvements, particularly the grid of streets. Future proffers will expand upon these commitments.

- Traffic impact analysis evaluating three time periods: first phase, interim phase, and Plan build-out

The TIA referenced above provides the evaluation over three phases.

- Urban design

- Achievement of the building, site design, and public realm design guidelines to achieve the urban aesthetic vision for Tysons

Great care has been taken to create a new urban form for this proposal distinctly different from the existing suburban style. WDG Architecture PLLC has included numerous sheets in the CDP with perspective views and sections, in addition to plan views, to accurately portray the key design concepts. Working with Parker/Rodriquez, Inc., landscape architects, WDG has provided details of building forms and relationships, streetscapes and the pedestrian realm, open plazas and park areas, all in keeping with the guidance of the Urban Design section of the Plan.

- A variety of buildings heights with the tallest buildings in the ranges specified by the building height map

Eighteen buildings are proposed within Spring Hill Station. They range in height from a low of 60 feet for the new fire station in Neighborhood III to 360 feet for the iconic office building in Neighborhood I at the entrance to the Tysons West station.

The Plan recommends maximum heights of 225 to 400 feet for Neighborhood I; the eight buildings in that neighborhood include two buildings with a height of 200 feet, three buildings with a height of 250 feet, one building with

a height of 280 feet, and one building with a height of 360 feet. In addition there are garage structures wrapped with first floor uses and topped with sky parks that are approximately 60 feet in height. These structures help provide separation between the taller towers and a nice variation in the skyline.

Most of Neighborhood II and all of Neighborhood III are recommended for a building height of 175 to 225 feet. Building heights proposed include 60 feet for the fire station, 130 feet for the two existing office buildings, 180 feet for the hotel, 200 and 225 feet for residential Buildings D-1, D-2 and E-4, and 295 feet for Building F-1 and 250 for Building E-3, the two buildings closest to the Metro station. Office Building D-4 is 280 feet tall. Extra height is needed for this building in order provide adequate land area for the fire station. A lower retail element is provided along Spring Hill Road in Neighborhood II, helping to add variety in height.

- Shadow and wind studies demonstrating that the design creates an inviting environment and does not cause a canyon effect

Buildings have been sited to avoid any canyon effects. Shadow studies have been provided in the CDP

- Urban park standards

Development of a usable and varied park and open space system is a fundamental tenet of the Tysons Plan. The urban environment is enriched by its open spaces both grand and intimate. A preliminary analysis of the urban park standards and the needs of the future residents, employees and visitors of our three neighborhoods has been prepared. Our transit oriented location within ¼ mile of the station makes the provision of large parks and/or athletic fields impractical. However, a comprehensive plan has been developed for the provision of appropriately scaled urban parks, which are vital to developing a vibrant urban center. The Applicant envisions a significant public plaza at the corner of Spring Hill Road and Route 7 extending into and through Neighborhood I as the main focal point of the station area. This plaza is activated by people coming to and from the station and to the mix of uses on site. It includes hardscapes and landscapes, fountains, outdoor dining, perhaps an amphitheater or other performance space. As the center of the proposed arts and entertainment district, it also serves as a gathering spot where musical performers entertain lunchtime diners or where art shows or other special events are programmed on the weekend. But there are also numerous other public open space areas proposed throughout the three neighborhoods with varying functions and character. Parker /Rodriquez Inc. has developed a typology of parks and open spaces including small neighborhood parks, public and private sky parks, and urban pocket parks, the details of which are included in the CDP.

- Active recreation facilities

The Applicant will include active recreational facilities within its buildings and the private and public sky parks. These will include such items as swimming pools, children's play areas, lawn games, fitness centers, etc. In addition, the Applicant will be exploring contributions to athletic fields in the Tysons area.

- Public facilities

The proposed development of Spring Hill Station provides for a number of public facility improvements. The Applicant is requesting that a public facility bonus of 100,614 square feet be allocated to the Application Property based on the Applicant's commitment to provide the following public facilities.

Greensboro Drive Extension -- Of major importance is the provision of an interconnected grid of streets and important connections with the existing road network. The Applicant proposes to extend Greensboro Avenue to connect Spring Hill Road with Tyco Road and set the alignment for the ultimate extension of Greensboro to a new ramp to westbound Dulles Airport Access and Toll Road. This will create new relief for motorists exiting Tysons.

Metro Station Entrance – To make Tysons West truly transit-oriented, great care must be taken to integrate the transit facilities seamlessly with the built environment. Georgelas Group LLC is currently in discussion with the Metropolitan Washington Airports Authority (MWAA) and Dulles Transit Partners to redesign the escalator/elevator structure to create an arrival pavilion that would be an exciting covered outdoor public space emphasizing and celebrating the station entrance. This design will be implemented in phases to ensure a vibrant station area from the rail's inception and allow further embellishment and integration with development of the adjacent buildings.

Kiss and Ride Facility – A kiss and ride facility will be provided in Neighborhood I, first as a surface facility near the station entrance and ultimately within the first level of Building A-2 to be constructed adjacent to and integrated with the station entrance pavilion.

Fire Station 29 – The Applicant has proposed to construct a new fire station within the Neighborhood III. This will allow the current station site to be developed in a transit oriented manner, but also will result in a new modern station able to provide fire and rescue services to a new urban Tysons Corner.

- Demonstrating how other properties in the subdistrict and in the general vicinity of the proposal can develop in conformance with the Plan

The CDP includes a sheet showing how the proposed grid of streets for the subdistrict can be provided and that the grid results in appropriately sized, walkable blocks. Plans also show how these new blocks that are not

a part of the Application Property can develop with a variety of buildings, heights and uses in conformance with the Plan.

Tyson's West North Subdistrict - Redevelopment Option Guidance

Development proposals should provide for the following.

- The vision for this subdistrict is to redevelop with office buildings with significantly higher intensity near the Metro station as well as to become more diverse in land uses, including hotels, residential dwellings, arts and entertainment uses, as well as retail and support services. Sites within 1/8 mile of the Metro station should be redeveloped predominantly with office use. Beyond 1/8 mile it is envisioned that the area will transition to urban residential neighborhoods. The intensities and land use mix should be consistent with the Areawide Land Use Recommendations.

Previously described in Major Elements of the Plan.

- Logical and substantial parcel consolidation should be provided that results in well-designed projects that function efficiently on their own, include a grid of streets and public open space system, and integrate with and facilitate the redevelopment of other parcels in conformance with the Plan. In most cases, consolidation should be sufficient in size to permit redevelopment in several phases that are linked to the provision of public facilities and infrastructure and demonstrate attainment of critical Plan objectives such as TDM mode splits, green buildings and affordable/workforce housing. If consolidation cannot be achieved, as an alternative, coordinated proffered development plans may be provided as indicated in the Areawide Land Use Recommendations.

Previously described in Major Elements of the Plan.

- Throughout this subdistrict, the goal for assembling parcels for consolidation or coordinated proffered development plans is at least 20 acres. A consolidation of less than 20 acres should be considered if the performance objectives for consolidation in the Land Use section of the Areawide Recommendations are met.

Previously described in Major Elements of the Plan.

- When a consolidation includes land located in the first intensity tier (within 1/8 mile of a Metro station), it should also include land in the second intensity tier (between 1/8 and 1/4 mile of a station), in order to ensure connectivity to the Metro station.

Previously described in Major Elements of the Plan.

- For property along Spring Hill Road, redevelopment proposals should address the redevelopment and relocation of the existing fire station and/or post office.

The rezoning of the Fire Station property and subsequent relocation will occur with new construction of Fire Station 29 in Neighborhood III.

- Redevelopment should occur in a manner that fosters vehicular and pedestrian access and circulation. Development proposals should show how the proposed development will be integrated within the subdistrict as well as the abutting districts/subdistricts through the provision of the grid of streets. The major vehicular circulation and access improvements in this subdistrict are the extension of Greensboro Drive and the planned new ramps from the Dulles Airport Access Road and Toll Road connecting to Greensboro Drive.

Previously described in Major Elements of the Plan.

- Redevelopment along planned street alignments should provide right-of-way, construct portions of the street integral to the development, and further the implementation of streets serving the development. Other streets should create urban blocks and pedestrian and bike circulation improvements should be provided. The ability to realize planned intensities will depend on the degree to which access and circulation improvements are implemented consistent with guidance in the Areawide Urban Design and Transportation recommendations.

The Applicant proposes to construct key sections of a grid of streets on the Application Property. Greensboro Drive, Tyco Road, Spring Hill Road and Merchants Avenue are planned as public streets. Condominium Avenue and Retail Circle are proposed as private streets. Public access easements would be provided, but right-of-way dedication is not envisioned.

- Urban design amenities, such as streetscapes, plazas, courtyards, landscaping, public art, lighting and seating should be provided consistent with the Areawide Urban Design Recommendations.

Previously described in Major Elements of the Plan and detailed on the CDP.

- As discussed above under the South Subdistrict, a second electrical power substation will need to be constructed near the Dominion Power easement which contains a high voltage line. This improvement will need to be located either in the Tysons West District or in the abutting Tysons Central 7 District. From the second substation to the existing substation on Tyco Road, the high voltage line should be placed underground, in order to ensure a pedestrian friendly environment. However, if undergrounding

proves infeasible, redevelopment should relocate the line or accommodate it in place.

The Applicant has investigated the possibility of placing underground the existing overhead high voltage line transversing Neighborhood I. It has been determined that it is cost prohibitive to underground this line, and has proposed to relocate it adjacent to Condominium Avenue and Spring Hill Road.

- The green network planned for this subdistrict illustrates how the existing Dominion Power easement could be used as a pedestrian and open space amenity that links the Tysons West Metro station to the rest of the subdistrict. Along the power line easement, a series of urban parks are envisioned which link to other urban parks by the street grid. Alternatives that provide open spaces linking this subdistrict to the area's Metro station in a similar manner should be considered.

The Applicant plans to relocate the existing high voltage power lines for their current easement to align with Condominium Avenue and the north side of Spring Hill Road. However, a series of urban parks is viewed as a central element to the proposed design. A significant plaza/civic park is planned through Neighborhood I from Leesburg Pike to the future Merchants Avenue. Pedestrians from the North Subdistrict will use this public space to easily access the Metro station, as well as to meet, relax and be entertained. This park could be extended further with redevelopment of properties to the north.

- Additional urban parks are to be located throughout the subdistrict. All urban parks in this subdistrict should be large enough for open-air activities such as farmers' markets and musical performances by small groups for residents and workers in the area. The sizes of these parks should be between 1/2 to over one acre. At least one two acre recreation-focused park should be provided in the subdistrict to serve the recreation and leisure needs of future residents and workers. Facilities could include sport courts, playground features, skate parks, splash pads, or other small-footprint facilities. Publicly accessible open space and recreational facilities should be provided in this subdistrict consistent with the Areawide Environmental Stewardship Recommendations.

Previously described in Major Elements of the Plan.

- When redevelopment includes a residential component, it should include recreational facilities and other amenities for the residents, as well as affordable/workforce housing as indicated under the Areawide Land Use Recommendations.

Residential structures will be designed with a full complement of on-site indoor and outdoor recreational amenities. These are likely to include swimming pools, fitness gyms, sport courts, clubrooms and exercise areas, and will be detailed on

future Final Development Plans. In addition, 20% of all residential units will be provided as affordable and/or workforce units.

- Public facility, transportation and infrastructure analyses should be performed in conjunction with any development application. The results of these analyses should identify needed improvements, the phasing of these improvements with new development, and appropriate measures to mitigate other impacts. Also, commitments should be provided for needed improvements and for the mitigation of impacts identified in the public facility, transportation and infrastructure analyses, as well as improvements and mitigation measures identified in the Areawide Recommendations. It is anticipated that existing Fire Station 29 and the U.S. Post Office on Spring Hill Road will be relocated as redevelopment occurs.

Previously described in Major Elements of the Plan.

- Building heights will vary depending upon location, as conceptually shown on the Building Height Map in the Areawide Urban Design Recommendations. The tallest buildings should be closest to the Metro station where building height is planned up to 400 feet. Building heights (generally between one-eighth and one quarter mile from the Metro station) should be between 175 and 225 feet. Beyond one-quarter mile, buildings should have lower heights, as conceptually shown on the Building Height Map in the Areawide Urban Design Recommendations. Building heights should be consistent with the above guidance as well as the guidelines in the Areawide Urban Design Recommendations.

Previously described in Major Elements of the Plan.

- Exposed parking structures adjacent to the Dulles Toll Road should not be visible to the residential neighborhoods north of the Toll Road.

The Application Property does not include any parking structures adjacent to the Dulles Toll Road.

- A potential circulator alignment extends through this subdistrict as described in the Areawide Transportation Recommendations. In addition to the above guidance for this area, redevelopment proposals along the circulator route should provide right-of-way or otherwise accommodate the circulator and should make appropriate contributions toward its construction cost. See the Intensity section of the Areawide Land Use Recommendations.

Previously described in Major Elements of the Plan.

To the best of our knowledge, there are no known hazardous or toxic materials on the Application Property nor are there any planned with the proposed use. Furthermore, to the best of our knowledge and belief, the proposed use will be in conformance with all applicable ordinances, regulations and adopted standards with the following exceptions requested below:

1. Waiver of the transitional yard screening and barrier requirements pursuant to Zoning Ordinance Section 13-305 Paragraphs (1) and (6) between the multi-family residential uses and office/commercial uses within the development.
2. Pursuant to Paragraph 11 of Section 13-305 of the Zoning Ordinance, a modification of transitional screening and waiver of barrier requirements is requested along the major thoroughfares and interstate highways to that shown on the CDP.
3. Modification of the peripheral landscaping requirements of the Zoning Ordinance pursuant to Section 13-203 Paragraph (3) for above grade parking structures due to the urban nature of the site.
4. Modification of the interior parking lot landscaping requirements of the Zoning Ordinance Section 13-202 Paragraph (6) on all parking structures to that shown on the CDP.
5. In keeping with the urban concept of this development, a modification of PFM standard 12-0702 1B (2) is requested to permit the reduction of the minimum planting area for trees planted to satisfy the tree cover requirement to reduce the width from eight (8) feet to a minimum of five (5) feet as shown on the CDP and as provided in the proffers. Structural soils will be implemented to enhance survivability of the trees subject to this modification request. Refer to the typical street sections for the graphic planting plan.
6. Modification of the Tyson's Corner Urban Center streetscape design in favor of that shown on the CDP.
7. Waiver and/or modification of all trails and bike trails in favor of the streetscape and on-road bike trail system shown on the CDP.
8. Pursuant to Section 11-201, Paragraph (4) and Section 11-203 of the Zoning Ordinance, a modification of the loading space requirements for multi-family dwelling units and office/commercial use in favor of that which is shown on the CDP.
9. A modification of Section 7-0802.2 of the PFM and Section 11.102.12 of the Zoning Ordinance to allow for the projection, by no more than 4%, of the stall area of structural columns into parking stalls in parking structures. Such parking spaces shall count toward the number of parking spaces required by the Zoning Ordinance.

10. A modification of the parking geometric standards of Section 11-102.12 of the Zoning Ordinance to allow for 75 degree angled parking.
11. A modification of Public Facilities Manual (PFM) Section 7-0800 and Zoning Ordinance Section 11-102 Paragraph (12) to allow tandem spaces with valet services for non-residential uses. Such stacked parking spaces, in accordance with Section 11-101 Paragraph (1), shall count toward required parking specified in the Zoning Ordinance.
12. Pursuant to Paragraph 5 of Section 11-102 of the Zoning Ordinance, a modification of the parking requirements to that shown on the CDP when within an area in proximity to a mass transit station.
13. Waiver of the maximum length of private streets as provided in Paragraph 2 of Section 11-302 of the Zoning Ordinance to allow private streets in excess of 600 ft. in length.
14. A waiver of the service road along Route 7 and Route 123.
15. A waiver of Section 17-201 Paragraph (3) of the Zoning Ordinance to provide additional inter-parcel connection to adjoining parcels other than those specifically identified on the CDP.
16. The Applicant requests a determination of Zoning Ordinance Section 17-201 Paragraph (4) requiring any further dedication and construction of widening for existing roads beyond that which is indicated on the CDP. Dedication and improvements shown on the CDP shall be deemed to meet all Comprehensive Plan Policy Plan requirements.
17. A waiver to allow stormwater management (SWM) and Best Management Practices (BMPs) to be satisfied by underground systems for the proposed residential development, as referenced in Section 6-0303.8 of the PFM.
18. A waiver of the 10-year Tree Canopy requirements as set out in PFM Section 12-0509 due to the overall urban nature and intensities in this area. The waiver is requested in favor of the Tysons Corner Urban Center Areawide and District Recommendations pertaining to urban design guidelines as it relates to streetscape design. These guidelines layout the intent of trees, landscaping and streetscapes in Tysons Corner and are specified on the CDP.
19. A modification from the Tree Preservation Target. This modification is permitted based on two (2) allowable deviations in the Fairfax County Public Facilities Manual. The first is § 12-0507.3A(1), which states, "Meeting the Tree Preservation Target would preclude the development of uses or densities otherwise allowed by the Zoning Ordinance." The second is § 12-0507.3A(3), which states, "construction activities could be reasonably expected to impact existing trees or forested areas used to meet the tree preservation target to the extent they would not likely survive in a healthy and structurally sound manner for a minimum of 10-years in accordance with the post-development standards

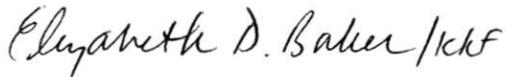
for trees and forested areas provided in § 12-0403.” Specific trees to be preserved are identified on the CDP.

The proposed rezoning implements the vision of the new Comprehensive Plan for Tysons Corner to create a vibrant, mixed use community that is transit-oriented and pedestrian friendly. It will result in a new urban form for Tysons, with a connected grid of streets, walkable blocks, new residential opportunities, lively streets with shops, café's and services, as well as attractive parks and plazas. A high level of detail to site design, transit integration, architectural style, and streetscaping will ensure that Spring Hill Station becomes a signature transit-oriented development and a stimulus for further redevelopment of the Tysons West District.

Thank you for your attention to this matter. Should you require any additional information, please call me.

Very truly yours,

WALSH, COLUCCI, LUBELEY, EMRICH & WALSH, P.C.

A handwritten signature in cursive script that reads "Elizabeth D. Baker /kkf".

Elizabeth D. Baker
Land Use Coordinator