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Department of Planning & Zoning
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Zoning Evaluation Division

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

Re: Promenade at Tysons West
Application to Rezone Land in the Tysons Corner Urban Center
Tysons West Residential, L.L.C. and JBG/Tysons Hotel, L.L.C. (the "Applicants")
Tax Map 29-1 ((1)) 10D and 29-3 ((1)) 1B and 29-3 ((20)) C1 (the "Property")

Dear Ms. Berlin:

This letter serves as a statement of justification for a rezoning application which encompasses a consolidation of approximately 16.02 acres of land in the Tysons West area of Fairfax County. This rezoning and Conceptual Development Plan (CDP) application (the "Application") propose to rezone the Property from the General Industrial (I-5), Regional Retail (C-7), Highway Corridor Overlay (HC) and Sign Control Overlay (SC) Districts to the Planned Tysons Corner Urban Center (PTC), HC and SC Districts. The Applicants, Tysons West Residential, L.L.C. and JBG/Tysons Hotel, L.L.C., are the owners of the Property. The Property is currently developed with the Sheraton Premier Hotel and the former Moore Cadillac/Hummer dealership. The Applicants seek to transform the Property, referred to as "Promenade at Tysons West," into a walkable, transit-oriented neighborhood with a mix of residential, retail, office and hotel uses.

I. Application Area

The Property is located approximately 1/8 mile west of the proposed Tysons West Metro Station (the "Metro Station") which is currently under construction along Leesburg Pike. For the purposes of description in this statement, Leesburg Pike is assumed to run east-west and Westwood Center Drive to run north-south. Located immediately west of Westwood Center Drive, the Property has significant frontage along Leesburg Pike. To the east, the Property is bounded by the Dulles Airport Toll Road (the "Toll Road") and the south by an office building zoned PDC and Westwood Village, a condominium townhome community zoned PDH-12.

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Consisting of three individual tax parcels, the Property has a total land area of 16.02 acres. The existing conditions are outlined in the following chart:

Tax Map ID	Zoning	Land Area (acres)	Existing Use
29-3 ((1)) 1B	C-7, HC, SC	6.97693	Former auto dealership
29-3 ((20)) C1	C-7, HC, SC	.07590	Former auto dealership
29-1 ((1)) 10D	I-5, HC, SC	8.96410	Hotel/conference center
Total		16.02062	

The majority of the Property (approximately 8.29 acres) is located between $\frac{1}{8}$ and $\frac{1}{4}$ mile of the Metro Station's entrance; 6.02 acres fall between the $\frac{1}{4}$ and $\frac{1}{2}$ mile radii and the remaining 1.71 acres fall between $\frac{1}{2}$ and $\frac{1}{2}$ mile radii from the Metro Station.

II. Overall Vision

Considerable deliberation has been given to developing the overall planning vision for the Promenade at Tysons West. The vision is to create a new mixed-use community within easy walk of Metro. But the vision goes beyond that to create a unique neighborhood setting with plenty of retail and dining opportunities, so that when you work or live at the Promenade at Tysons West, there is no need to leave for your day-to-day needs. The framework for the vision is Promenade Place, a new street being proposed through the center of the site. While Leesburg Pike and Westwood Center Drive will be important streets with well-designed buildings and streetscapes, the life of the neighborhood will be Promenade Place, where all the variety of uses come together to create a lively street scene. Here is where workers, residents, shoppers, and hotel patrons will stroll, browse and linger. They will be able to shop for groceries, work out at the health club, dine in outdoor cafes, take in the outdoor artworks or enjoy a number of on-site parks.

The Applicants' proposal will replace an existing former automobile dealership with a mixture of high-rise and mid-rise buildings designed around a series of urban blocks. It will also incorporate a newly renovated Sheraton Premier hotel and give it a new urban presence on Promenade Place. The site design plan for Promenade at Tysons West seeks to capitalize on proximity to transit by locating the highest intensity commercial building closest to the Metro Station, but also strives to ensure a human scale to the overall development.

III. Program of Development

The Applicants' CDP proposes a partial redevelopment of the Property which will include retaining and renovating the existing hotel building, reutilizing an existing parking garage, constructing a new building under an approved by-right site plan, and constructing three additional buildings. The five buildings include: an office building (A); two residential structures (B and C); a retail/office building (Ex-D); and the hotel (Ex-E). As discussed above, the buildings are oriented to a new grid of streets forming walkable urban blocks. These new streets will provide easy and convenient vehicle, bicycle, and pedestrian access to and from the Metro Station and through and around Promenade at Tysons West.

The following chart identifies the mix of land uses, GFA and FAR for the Property.

Land Use Mix, GFA and FAR

Use	GSF	Percentage of Total	FAR
--Office	378,768	23%	.54
--Retail	270,373	16 %	.38
--Residential	626,000	38 %	.90
--Hotel	388,000	23 %	.55
TOTAL	1,663,141	100 %	2.37

Specific details are provided on the CDP, but the general program for each building is described below.

Building A is located in the southeastern portion of the Property, immediately adjacent to the Leesburg Pike and Westwood Center Drive. It is the building site closest to the Metro Station. Building A will be a maximum of 225 feet in height (19 stories) and will include approximately 350,000 square feet of office use and 25,000 square feet of ground floor retail uses, for a total of 375,000 square feet. Pedestrian entrances are planned be located along Leesburg Pike, Westwood Center Drive and the future internal street. Access to underground and podium parking levels and loading will occur from the future interior street.

Building B is located on the same block as Building A and has frontages on Westwood Center Drive, Promenade Place and the future interior street. Building B is proposed as a 22-story residential tower with 310,000 square feet of multi-family residential units, 23,000 square feet of ground floor retail uses and a maximum height of 225 feet. The building will be oriented primarily toward Westwood Center Drive and Promenade Place. Similar to Building A, access to parking and loading will occur from the future interior street. Building B will share a spacious elevated roof garden of approximately 14,715 square feet with Building A.

Building C is located north of Buildings A and B and completes the frontage of Leesburg Pike. Building C will be a maximum of 70 feet in height (6 stories) and have a total of 382,000 square feet, of which 316,000 square feet will be dedicated to multi-family residential use and 66,000 square feet of ground floor retail and service uses. Pedestrian entrances to the residential and retail uses are planned along both Promenade Place and the future interior street. Access to underground and podium parking levels will be provided from Promenade Place, the future interior street and a private drive aisle to the rear of the building. Loading for Building C will be accessed from the private drive aisle as well. Two private exterior amenity areas are provided for Building C. A 6,380 square foot private courtyard is located in the southern part of the building and a larger 14,500 square foot space is provided facing Promenade Place in the northern section of the building.

Building Ex-D is located in the southwest corner of the Property and is bounded by Westwood Center Drive on the south, Sheraton Tysons Drive on the west, Ashgrove Lane on the north and Promenade Place on the east. This block has site plan approval for an 182,141 square foot structure that is soon to be under construction. The approved building retrofits the ground level of an existing six story above grade parking structure to accommodate construction of a new retail and office building. Approved retail uses total 156,373 square feet and include a small format Wal-Mart, 24 Hour Fitness Club and other small retail shops. An office component of 28,768 square feet is located along Promenade Place and is integrated with the retail uses and parking structure through a large common lobby. Building Ex-D is 7 stories and 90 feet in height. Parking access is provided from both Promenade Place and Tysons Sheraton Drive. Loading will be provided from Tysons Sheraton Drive. In addition to the approved building, an additional 3,000 square feet of small retail uses are proposed for the corner of Promenade Place and Ashgrove Lane adjacent to a new linear park to be located between Building Ex-D and Ashgrove Lane. This public space of 15,464 square feet is planned as an activated dog park to serve the needs of future resident at the Promenade at Tysons West and existing residents in nearby neighborhoods.

Building Ex-E is the existing Sheraton Premier Hotel which is located between Ashgrove Lane and the Toll Road off-ramp. The Sheraton Premier was constructed in 1985 and has since served as the western gateway feature for Tysons. The 225 foot tall hotel consists of a 22-story tower and three story conference and amenity space. The hotel is approximately 384,000 square feet in size and includes 443 rooms and associated conference and service space. Major interior renovations and minor additions are planned that will bring the total GSF to 388,000. The hotel structure currently sits back considerably from Leesburg Pike; an existing parking structure is located in the area between the main building and Leesburg Pike. This parking structure will be removed with the construction of Building C and an expanded underground parking facility will serve the needs of hotel patrons. Access to the underground parking levels will occur from Promenade Place, as Promenade Place will become the new point of arrival to the hotel. The existing surface parking to the rear of the hotel will be reduced to provide for a neighborhood park approximately 14,450 square feet in size. A public plaza 8,830 square feet in size is planned at the central and visible corner of Ashgrove Lane and Promenade Place.

III. Phasing of Development

With 16.02 acres of land and 1,663,141 square feet of development, the redevelopment of Promenade at Tysons West will occur in phases. In order to maintain a degree of flexibility to respond to changing market conditions, it is not possible at this time to commit to the sequencing of construction. However, a description of the intended phases of construction is provided below, along with the parking, public facilities, parks, and sections of the street grid planned to be built with each building. This phasing has been graphically portrayed in the CDP.

Phase Ex-D—As described above, Building Ex-D is anticipated to start construction later this summer. To accommodate the construction, the existing dealership building fronting on to Leesburg Pike will be demolished and the parking in this area reconfigured. Building Ex-D will be constructed into and around the existing parking structure. With this phase, Promenade Place will be constructed from Westwood Center Drive to the northern end of Building Ex-D. Streetscaping will be provided along Promenade Place, Westwood Center Drive and Tysons Sheraton Drive. A traffic signal will be installed at the intersection of Westwood Center Drive and Tysons Sheraton Drive and an interim sidewalk will be provided along the north side of Westwood Center Drive from Promenade Place to Leesburg Pike.

Phase 1—To prepare for the construction of Building C, considerable staging work is required. In Phase 1, the existing hotel canopy will be removed and a temporary main entrance to the hotel will be constructed on the north face of the hotel. The surface parking spaces in front of the hotel will be removed and temporarily relocated to the surface lot at the corner of Leesburg Pike and Westwood Center Drive. Ashgrove Lane will be realigned slightly and the linear dog park will be constructed.

Phase 2A—This phase continues the improvements to the hotel facility by removing a portion of the structured parking between the hotel and Leesburg Pike and extending Promenade Place across Ashgrove Lane in front of the hotel. Streetscaping is provided along the hotel's frontages with Promenade Place and Ashgrove Lane and the public plaza at the corner of Promenade Place and Ashgrove Lane is constructed.

Phase 2B—Building C is built. Future Street is constructed from Leesburg Pike to Promenade Place and streetscaping is provided along Building C's frontages with Leesburg Pike, Future Street and Promenade Place. Residential courtyard amenities are provided for the residents of Building C. In addition, the hotel entrance is re-established along Promenade Place and the area of the temporary hotel entrance is converted into park space. The surface parking lot at the corner of Leesburg Pike and Westwood Center Drive is removed and the area is seeded as interim open space.

Phase 3—Buildings A and B are constructed and podium level amenities are provided. Permanent streetscaping is established along Buildings A and B's frontages on Leesburg Pike,

Westwood Center Drive, Promenade Place and Future Street. A portion of the parking lot behind Ex-F is converted to a neighborhood park.

IV. Comprehensive Plan Guidance

The 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 - South Subdistrict recommendations. In general, the Plan recommends that the Tysons West District redevelop into a new arts and entertainment area for Tysons. The Property is recommended for two land use categories. The Plan recommends that the area between Westwood Center Drive and Ashgrove Lane be redeveloped in keeping with the Transit Station Mixed Use land use category, which contemplates an office use component of no more than 65% and a residential component on the order of 20% or more. The portion of the Property north of Ashgrove Lane is 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.

Planned intensity recommendations are based on a tiered approach. Approximately 52% of the Property is located within ¼ mile of the future Metro Station entrance; sites within ¼ mile of the Station are not subject to a maximum FAR. Land located between ¼ and ½ mile from the Station entrance accounts for 36% of the Property. The remaining 12% of the Property is located between ½ and ¾ mile of the station entrance. The Plan recommends that the area between ¼ and ½ mile from the station entrance be developed with a maximum FAR of 2.0 (excluding bonuses), except that residential uses within ¼ and ½ mile may develop up to 2.5 FAR (excluding bonuses). Below is a table outlining the land areas and development proposed within various intensity tiers.

Intensity Tiers and FAR

Intensity Tiers	Land Area and Density Credits	GFA	FAR
⅛ - ¼ mile	360,941	1,188,141	3.28
¼ - ⅓ mile	262,387	435,000	1.66
⅓ - ½ mile	74,530	38,000	.51
TOTAL	697,858	1,663,141	2.37

The FARs proposed for the Promenade at Tysons West conform to the Plan's intensity recommendations. The Property's maximum overall FAR is 2.37 and intensity decreases with distance from the Metro Station. The proposed rezoning is also in keeping with the land use recommendations of the Plan. The mix as described above and set forth in the tabulations on the CDP is approximately 23% office, 38% residential, 23% hotel, and 16% retail and service uses.

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 and CDP for the 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.

Plan Guidance	Applicants' Proposal
Major Elements of the Plan	
<ul style="list-style-type: none"> • Mix and arrangement of uses 	<p>The proposed mix of uses is in keeping with overall guidance in the Land Use section and the Tysons West – South Subdistrict description. The Plan calls for development of a mixture of Transit Station Mixed Use, which envisions an office use component of no more than 65% and a residential component on the order of 20% or more and Residential Mixed-Use which is described as primarily residential, on the order of 75% or more. The mix is approximately 23% office, 38% residential, 23% hotel, and 16% retail and service uses. In keeping with the Plan and Subdistrict recommendations, the greatest intensity will be concentrated closest to the Metro Station, and office use is located closest to the Station.</p>
<ul style="list-style-type: none"> • Affordable and workforce housing 	<p>Twenty percent (20%) of the residential units will be provided as workforce housing in keeping with the guidance in the Plan.</p>
<ul style="list-style-type: none"> • Green building expectations 	<p>New commercial structures will be designed and constructed to meet a minimum of LEED Silver certification. The residential structures will be designed and constructed to meet a minimum of LEED certification or the equivalent.</p>
<ul style="list-style-type: none"> • Stormwater Management 	<p>The goal of stormwater management measures for the 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 Property will provide both water quantity and water quality controls to achieve the above-stated goal.</p>

	<p>The intent of the stormwater management plan for the Property is to attempt to mimic the pre-developed peak release rates for the 1-, 2- and 10-year storms. In order to control both the post-developed peak flow rates and reduce the post-developed runoff volumes (similar to LEFD), 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, below is a list of possible alternative to provide water quality and quantity:</p> <ul style="list-style-type: none"> •Tree box filters will 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 <i>in situ</i> soils. •Pervious hardscapes/streetscapes will allow for infiltration of portions of the runoff volume through the pervious surface into storage below where it will be held for infiltration into the ground, depending on the characteristics of the <i>in situ</i> soils. •Stormwater will recycled into the water supply of the new buildings for allowable purposes such as gray water, landscape irrigation, and air conditioning unit cooling to the extent practicable. Detention vaults on a site will be designed to 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.
<ul style="list-style-type: none"> •Consolidation performance objectives 	<p>The South Subdistrict guidance suggests a consolidation goal of 20 acres. The Property includes 3 parcels with a total land area of approximately 16.02 acres. Due to the nature of surrounding development being relatively recent, and the location of the Property in the far western part of Tysons Corner adjacent to the Toll Road, there are no other properties to be added to the consolidation. This large area in the consolidation includes property in Tiers 2, 3 and 4. The size, shape and location of the Property will foster achievement of the performance objectives in</p>

	<p>developing an efficiently functioning community, creating a grid of streets, providing a comprehensive public open space system, as well as integrating with and facilitating the redevelopment of adjacent land in keeping with the Plan, and permitting the phasing of redevelopment.</p>
<p>•Transportation</p>	
<p>°Grid of streets on and off-site</p>	<p>The Applicants have worked with the other Tysons West South Subdistrict property owners to prepare a network of streets to provide accessibility and connectivity. The intent was to propose a grid in keeping with the Tysons vision that is both effective and practical. The proposed extended grid for the Subdistrict is provided in the CDP. The Applicants have coordinated the location of the streets shown on the CDP with the applications by CARS, Perseus and Sunburst, filed to the east of the Property adjacent to Spring Hill Road. The larger grid includes construction of a new section of Boone Boulevard which will ultimately connect Gosnell Road with Westwood Corporate Center Drive and potentially to the Dulles Toll Road.</p> <p>Through the Property two new streets are planned. Running parallel between Leesburg Pike and Tysons Sheraton Drive is Promenade Place, a new local street. Running parallel to Westwood Center Drive is Future Street, connecting Promenade Place with Leesburg Pike and offering right-in/right-out access from the Property to eastbound Leesburg Pike. This inter-connected grid of streets will provide significant improvements in connectivity and help establish a series of new urban blocks.</p>
<p>°Vehicle trip reduction objectives</p>	<p>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 for residential uses and non-residential uses. These reduction goals were agreed upon with FCDOT and VDOT during the scoping of the TIA. Future proffers will further detail the objectives and comprehensive TDM program.</p>

<p>°Parking management</p>	<p>Parking management will be a principal component of the Applicants' TDM program. The amount of parking proposed for the Property is consistent with the parking recommendations in the Plan and the PTC District regulations. The CDP provides details as to the location, access and number of spaces. These details and the cost of parking will be described in the Applicants' TDM program.</p>
<p>°Phasing to transportation improvements and programs</p>	<p>The CDP provides several sheets setting forth the potential phasing of development to planned transportation improvements, particularly the grid of streets. The Applicants' proffers will elaborate on the phasing commitments once the TIA is reviewed by VDOT and discussed with FCDOT.</p>
<p>°Traffic impact analysis evaluating three time periods; first phase, interim phase and plan build-out</p>	<p>The TIA referenced above provides the evaluation over three phases.</p>
<p>•Urban Design</p>	
<p>°Achievement of the building, site design, and public realm design guidelines to achieve the urban aesthetic vision for Tysons.</p>	<p>MV+A Architects has studied the Property's physical and locational characteristics, and understands the benefits in retaining portions of the existing buildings in the new development. It is familiar with the aesthetic vision for Tysons and the specific urban design guidance as established in the Plan. The proposed CDP looks to reuse elements of existing development as a major contribution to sustainability and at the same time create a new, exciting mixed-use neighborhood that is distinctly urban in form. Working with LandDesign landscape architects, MV+A has provided details of building forms, massing, streetscapes and the pedestrian realm, open park areas, and private amenity spaces with particular attention to the guidance in the Urban Design section of the Plan.</p>
<p>°A variety of buildings heights with the tallest buildings in the ranges specified by the building height map.</p>	<p>Five buildings are proposed for the Property ranging in height from 75 to 225 feet. The Sheraton Premier hotel has long been a recognized landmark in Tysons with a height approaching 215 feet. The Plan calls for its gateway appearance to remain. As such, Buildings C and Ex-D immediately adjacent to the hotel are proposed at 75 to 90 feet in height, thereby allowing the hotel to be the dominant form. Further from the Sheraton, Buildings A and B are planned at</p>

	<p>225 feet in recognition of their proximity to the Metro Station. The proposed heights are all in keeping with the building height map.</p>
<p>°Shadow and wind studies demonstrating that the design creates an inviting environment and does not cause a canyon effect.</p>	<p>Buildings have been sited to avoid canyon effects. Shadow studies have been provided in the CDP.</p>
<p>•Urban park standards</p>	<p>Development of a usable and varied park and open space system is a principal objective of the Tysons Plan. A preliminary analysis of the urban park standards and the needs of the future residents and visitors of the Property has been prepared. The urban park standard recommended for Tysons Urban Center is 1.5 acres for each 1000 residents and 1.0 acre for each 10,000 employees. The approximate 625 dwelling units together with the commercial development proposed is estimated to result in a recommended park requirement associated with the Property of 1.64 acres.</p> <p>A comprehensive park and open space plan has been developed for the provision of appropriately scaled urban parks, which are key to attracting residents and developing a vibrant and sustainable urban community. Overall, 1.16 acres of public park area are provided, coupled with 1.21 acres of private open space and .67 acres of streetscape rich with amenities.</p> <p>Open space includes public parks at grade and private spaces above podium parking, private parks. Three at grade parks in excess of ¼ acre each are proposed at key locations in the neighborhood. A neighborhood park of 14,450 square feet is located along the north side of Ashgrove Lane adjacent to the Westwood Village community. A linear park on the south side of Ashgrove Lane provides 15,464 square feet of active park space programmed for dogs and their owners. A corner plaza just under ¼ acre is planned at the corner of Ashgrove Lane and Promenade Place providing a more urban hardscaped landscape feature and completing the series of parks along Ashgrove Lane. To the north, a 11,860 square</p>

	<p>foot park/plaza is designed to provide respite for hotel patrons and residents. Finally, to the south from Ashgrove Lane, the richly detailed shopping streetscape of Promenade Place, embellished with public art, will provide a lively place to walk, browse and linger. Together these spaces will provide a variety of passive and active park opportunities.</p>
<ul style="list-style-type: none"> •Active recreation facilities 	<p>The Applicants will include active recreational facilities within its buildings, private open space areas and the public parks described above. The location of a 24 Hour Fitness health club within Building Ex-D will provide a superior and convenient fitness and recreational facility for the neighborhood. The 24 Hour Fitness Club will include a full size basketball court, indoor swimming pool and numerous other active facilities.</p>
<ul style="list-style-type: none"> •Public Facilities 	<p>The Applicants are providing an extensive network of public parks as its public facility contribution. The Applicants will also work with Planning Staff to identify other potential public facility needs.</p>
<ul style="list-style-type: none"> •Demonstrating how other properties in the subdistrict and in the general vicinity of the proposal can develop in conformance with the Plan. 	<p>The Applicants have worked with many of their neighbors to develop a proposed grid of streets for the South Subdistrict resulting in appropriately-sized, walkable blocks. In setting the grid, the Applicants have analyzed how these links can be made to encourage greater connectivity and accommodate future redevelopment opportunities for their neighbors. The Applicants are continuing to reach out to adjacent properties to solicit their input on the proposed grid.</p>
<p>Tyson's West South Subdistrict - Redevelopment Option Guidance Development proposals should provide for the following:</p>	
<ul style="list-style-type: none"> • The vision for this subdistrict is to redevelop with significantly higher intensity near the Metro station as well as to become more diverse in land uses and incorporate an arts and entertainment focus. The intensities and land use mix should be consistent with the Areawide Land Use Recommendations. 	<p>The highest intensity buildings are concentrated on the portion of the Property closest to the Metro Station. The FAR for the portion of the Property within ¼ mile of the Metro Station is 3.28. Between ¼ and ½ mile, the proposed FAR is 1.66. The small area outside the ½ mile is proposed at a .51 FAR.</p> <p>The land use mix is approximately 23% office, 38% residential, 23% hotel, and 16% retail and service.</p>

	Both the proposed intensities and mix of uses are consistent with the Areawide Land Use Recommendations.
<ul style="list-style-type: none"> • Logical and substantial parcel consolidation should be provided that results in well-designed projects that function efficiently on their own, should 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. 	The Property is substantial enough to provide for a grid of streets with the development of two new connected streets to complement the existing framework of Westwood Center Drive, Tysons Sheraton Drive and Ashgrove Lane. A comprehensive park and open space system has been developed to meet the needs of the residents and surrounding uses. Green building practices and workforce housing are being provided in conformance with Plan guidance. A detailed phasing plan has been included illustrating how the streets, open spaces, parking, streetscapes and amenities can be developed systematically over time.
<ul style="list-style-type: none"> o In 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. 	The proposed development on 16.02 acres substantially conforms to the 20 acre consolidation goal and is sufficient to attain stated goals of the Plan.
<ul style="list-style-type: none"> o 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. 	The Property does not include land within the first intensity tier, however, it does include land in the following multiple tiers: 52% of the Property is in the second tier; 36% of the Property is located in Tier 3 and 12% of the Property is located in Tier 4.
<ul style="list-style-type: none"> • Redevelopment should occur in a manner that fosters vehicular and pedestrian access and circulation. Development proposals should show how the proposed development 	The Applicants propose to construct key sections of a grid of streets on the Property including Promenade Place and Future Street. Wide pleasant sidewalks along the streets and through the

<p>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 Boone Boulevard and planned new ramps from the Dulles Airport Access Road connecting to Boone Boulevard.</p>	<p>community will invite pedestrians to walk to Metro, as well as to the uses on the properties adjacent to the Property. The Applicants have worked with its neighbors to coordinate a grid that is practical and achievable. The Applicants are aware of the County's plans to study potential connections to the Toll Road. The Applicants are willing to assist in this effort and determine the best connection to the Toll Road on the south side of Leesburg Pike.</p>
<ul style="list-style-type: none"> • 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, including multi-use trails along the adjacent stream valley park land. 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. 	<p>As discussed above, the Promenade at Tysons West CDP proposes the creation of two new streets that together with the existing streets will result in a series of walkable urban blocks. Pedestrian sidewalks are included along all streets. The Applicants are willing to study additional off-site pedestrian improvements to provide access to the Old Courthouse Spring Branch stream valley park located south of the Property.</p>
<ul style="list-style-type: none"> • Urban design amenities, such as streetscapes, plazas, courtyards, landscaping, public art, lighting and seating should be provided consistent with the Areawide Urban Design Recommendations. 	<p>See response to "Urban Park Standards" above.</p>
<ul style="list-style-type: none"> • 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 Old Courthouse Spring Branch Stream Valley Park to the Tysons West Metro station, as well as to several urban parks; alternatives that provide open spaces linking this subdistrict to the area's Metro station in a similar manner should be considered. 	<p>The Property is not located in close proximity to the Dominion Power easement, but as previously stated, the Applicants are willing to study off-site pedestrian improvements to provide access to the Old Courthouse Spring Branch stream valley park located south of the Property and to the Metro Station.</p>
<ul style="list-style-type: none"> • This area should also include one planned 	<p>The Land Use Map conceptually shows a urban</p>

<p>civic plaza (urban park), at least one acre in size and located within ¼ mile of the Metro station. This plaza should be large enough for open-air activities such as farmers' markets and musical performances by small groups for residents and workers in this area. A common green urban park of at least one acre should also be located in the subdistrict to provide active and passive recreation and leisure opportunities for residents and workers.</p>	<p>park/plaza adjacent to Leesburg Pike, immediately east of Spring Hill Road, not in close proximity of the Property. It is our understanding this civic plaza is being provided through the combined efforts of the CARS and Perseus applications. It is located within ¼ mile of the Station and is large enough to host a variety of community activities. A series of parks have been created on the Property including three at-grade parks in excess of ¼ acre each. Programmed as either a civic plaza, dog park or neighborhood park, these areas will provide a variety of passive and active park opportunities.</p>
<ul style="list-style-type: none"> • For active recreation, about four to six acres of new park land to support two athletic fields should be established in the area between existing park land and the Boone Boulevard extension. The land for these athletic fields may also be located in part in the abutting Tysons Central 7 District. Publicly accessible open space and recreational facilities should be provided consistent with the guidance in the Areawide Environmental Stewardship Recommendations. 	<p>The Property does not include any land between the existing park land and the Boone Boulevard extension. The Applicants are willing to work with their neighbors and other applicants to support the provision of an athletic field in the Subdistrict. The Promenade at Tysons West does not generate the need for a full athletic field on its own.</p>
<ul style="list-style-type: none"> • 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 	<p>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. The location of a 24 Hour Fitness health club within Building Ex-D will provide a superior and convenient fitness and recreational facility for the neighborhood. The 24 Hour Fitness will include a full size basketball court, indoor swimming pool and numerous other active facilities. In addition, 20% of residential units will be provided as affordable and/or workforce units.</p>
<ul style="list-style-type: none"> • 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 	<p>The Traffic Impact Statement ("TIA") prepared by Wells + Associates, Inc. details the impacts of the proposed development on the transportation infrastructure and identifies appropriate mitigation measures. The Applicants will also be working with County Staff to help fashion a public facilities "plan"</p>

<p>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.</p>	<p>for the Tysons West South Subdistrict. Phasing of the proposed development will generally be as identified in this statement and will be refined in the proffer commitments.</p>
<ul style="list-style-type: none"> • In addition, 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. 	<p>The Property is not located adjacent to the Dominion Power easement.</p>
<ul style="list-style-type: none"> • Under this option, building heights may range from 105 feet to 400 feet, 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 1/8 and 1/4 mile from the Metro station) should be between 150 and 225 feet. <p>Beyond one-quarter mile, buildings should have lower heights, with areas along Route 7 to the south at 175 feet and areas at the western edge of the subdistrict having heights up to 105 feet. The exception is the Tysons Sheraton Hotel, which is a gateway landmark at 215 feet in height; Property abutting to the east and south should not have buildings exceeding 150 feet in order</p>	<p>Five buildings are proposed for the Property ranging in height from 75 to 225 feet. The Sheraton Premier hotel has long been a recognized landmark in Tysons Corner with a height approaching 215 feet. The Plan calls for its gateway appearance to remain. As such, Buildings C and Ex-D immediately adjacent to the hotel are proposed at 75 to 90 feet in height, thereby allowing the hotel to be the dominant form. Further from the Sheraton, Buildings A and B are planned at 225 feet in recognition of their proximity to the Metro Station. The proposed heights are all in keeping with the building height map.</p>

<p>to maintain this building as an existing gateway to Tysons Corner. Building heights should be consistent with the guidelines in the Areawide Urban Design Recommendations.</p>	
<ul style="list-style-type: none"> • Exposed parking structures adjacent to the Dulles Toll Road should not be visible to the residential neighborhoods north of the Toll Road. 	<p>There are no exposed parking structures adjacent to the Dulles Toll Road that would be visible from the residential neighborhoods north of the Toll Road.</p>

IV. Requested Waivers and Modifications

To the best of our knowledge, there are no known hazardous or toxic materials on the Property, or 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:

A. Zoning Ordinance Waivers and Modifications

1. 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.
2. Modification of the interior parking lot landscaping requirements of Section 13-202 Paragraph (6) of the Zoning Ordinance on all parking structures, above grade, to that Shown on with the CDP application.
3. Modification of the Tysons Corner Urban Center streetscape design in favor of that shown with the CDP application specifically:
 1. To allow a reduced sidewalk width for a short distance (+/-125 feet) in front of the Wal-Mart building;
 2. To allow the sidewalk to be placed at the back of curb along the frontage of the proposed “dog park”;
 3. To allow for no pedestrian access along the rear service road, northeast corner of site; and
 4. To allow a 10 foot wide sidewalk pinch point at the corner of the retail building on Ashgrove Lane.
4. A waiver and/or modification of all trails and bike trails in favor of the streetscape and on-road bike trail system shown with the CDP application.

5. Waiver of the maximum length of private streets as provided in Section 11-302 Paragraph (2) of the Zoning Ordinance to allow private streets in excess of 600 ft. in length.
6. Waiver of service road along Route 7.
7. 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.
8. A waiver and/or modification of Section 17-201 Paragraph (4) of the Zoning Ordinance to not require any further dedication, construction or widening of 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 requirements.
9. A waiver and/or modification of Section 2-506. 1(A) and (C) of the Zoning Ordinance to allow structures located on the building roof to occupy an area greater than 25% of the total roof and to exclude air conditioning units and cooling towers, located outside the penthouse or screened area, from being included in the maximum building height if, said structure, air conditioner or cooling tower is for the purpose of providing building infrastructure to meet LEED certification.
10. A waiver of transitional yard and barrier requirements along the west property line adjacent to the existing multi-family development, in favor of that which is shown within the CDP application specifically to allow the existing parking lot edge condition to remain, as no improvements are proposed to this area of the site.

B. Public Facilities Manual (PFM) Modifications

1. 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 with the CDP application and as provided in the proffers. Structural soils or cantilevered/floating concrete sidewalk slabs will be implemented to enhance survivability of the trees subject to the modification request. Refer to the typical street sections for the graphic planting plan.
2. 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.

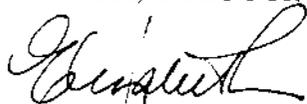
3. A modification of Public Facilities Manual (PFM) Section 7-0800 and Zoning Ordinance Section 11-102 Paragraph (12) to allow tandem spaces with valet services for non-residential uses. Such stacked parking spaces, in accordance with Section 11-101 Paragraph (1), may count toward required parking specified in the zoning ordinance.
4. A waiver to allow storm water 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.
5. 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 area wide and district recommendations pertaining to urban design guidelines as it relates to streetscape design. These guidelines set forth the intent of trees, landscaping and streetscapes in Tysons Corner.
6. A modification from the tree preservation target. This modification is permitted based upon two (2) allowable deviations in the Fairfax County Public Facilities Manual. The first is Section 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 Section 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 Section 12-0403." Specific trees to be preserved are identified on the CDP.

The proposed rezoning of the Property will help create the new Tysons envisioned in the Comprehensive Plan. It offers the opportunity to turn two single-use, suburban sites into a dynamic mixed-use neighborhood rich with shopping, dining and recreational venues. It will create the perfect area for employers, employees and residents looking to take full advantage of a close Metro location while enjoying the character of a more intimate neighborhood. The pedestrian-friendly design will help people leave their cars behind and opt for an easy walk to Metro and the enjoyment of many uses and services right next door. The retention of existing structures promotes sustainability and the provision of WDUs helps make this lifestyle available to many.

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, appearing to read "Elizabeth D. Baker".

Elizabeth D. Baker
Senior Land Use Planner