

February 16, 2022

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Jim Snyder
Director of Development Services / Community Planning
300 Park Avenue, Suite 103 East
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**RE: COMMENT-RESPONSE LETTER
APPLICATION FOR SPECIAL EXCEPTION SITE PLAN
WEST FALLS DEVELOPMENT PROJECT, BLOCK D-1**

Dear Mr. Snyder:

This firm represents TC MidAtlantic Development V, Inc. (the “Applicant”), the authorized developer of Block D-1 of the West Falls Development Project located at 7124 Leesburg Pike (RPC 51-221-007) (the “Property”). We are in receipt of the Owner Review Letter and Completeness Letter dated December 14, 2021 concerning the above-referenced zoning application. On behalf of the Applicant, please accept this comment-response letter and accompanying application resubmission materials.

OWNER REVIEW LETTER

1. City Council authorized the execution of a second amendment to allow for an additional 35,000 GSF for the senior housing building. The executed second amendment is required before the City can begin its governmental review.
Applicant Response: The Second Amendment has now been executed. The Applicant will continue coordinating with City Staff on the timing and logistics of the application review.

2. A-D1-200S, 201S, 202S – Exterior - Easily identifiable, manually operable windows or panels shall be distributed around the perimeter of each floor at not more than 50-foot (15 240 mm) intervals. The area of operable windows or panels shall be not less than 40 square feet (3.7 m²) per 50 linear feet (15 240 mm) of perimeter. Exceptions:
 - a. In Group R-1 occupancies, each sleeping unit or suite having an exterior wall shall be permitted to be provided with 2 square feet (0.19 m²) of venting area in lieu of the area specified in Item 1.
Applicant Response: The building will be designed and constructed with adequate operable windows to meet the venting area requirement.

- b. Windows shall be permitted to be fixed provided that glazing can be cleared by fire fighters (tempered glass and identified).
Applicant Response: In the event that adequate operable windows cannot be provided, the building will be designed and constructed with easily identifiable windows that can be broken out by fire fighters for venting of smoke. These windows will have a fire-fighter's symbol and will be tempered glass to meet applicable code requirements.
3. A-D1-100 - basement will require smoke removal – where will that go?
Applicant Response: A shaft has been added to the basement and ground floor plans between grid lines 2.3&3 and A for smoke removal. A louver that is 10' above the adjacent grade has been placed on the alley façade as part of the smoke removal system.
4. C-0207 - Alley will need egress path - i.e. sidewalk.
Applicant Response: The egress door to the alley has been relocated to egress out to the sidewalk along Street B.
5. C-0402 - Two FDCs will be required within 100' of fire hydrants
Applicant Response: A second FDC has been added along Mustang Alley.
6. A-D1-201S - Alley –check permitted openings based on imaginary line between this building and parking garage.
Applicant Response: The imaginary line is placed in the middle of the alley and noted as 12.5' away from the parking garage and senior living buildings. Per Virginia Construction Code, Table 705.8, maximum area of exterior wall openings based on a fire separation distance and degree of opening protection, the allowable opening area is 45% for protected buildings. Block D-1's design meets this 45% limitation.
7. Sheet C-1101- Street B is a two-way street and Autoturn from Alley 1 to Street B cannot encroach into the through lane on Street B.
Applicant Response: As discussed with City Staff, in order to have an urban development design and street network, the streets were designed to be narrow and radii smaller, with the City's desired 15' radius. The Applicant does not anticipate that the loading will be used frequently, and loading timing could be managed such that most loading operations take place during periods when Street B will experience less volume of traffic. The goal for the development was always to create a slower-pace environment for vehicles to help create safer passage for pedestrians. Vehicles on Street B will need to approach the alley intersection with caution, and trucks turning onto Street B would just need to wait for an opening, similar to how other loading

areas are utilized throughout the City. These are also private streets, and the Applicant does not anticipate that this turning movement will impact the public roads.

8. Sheet C-1101- Alley 1 is a two-way street and Autoturn from D-1 Block driveway to Alley 1 cannot encroach into the through lane on Alley 1.
Applicant Response: As discussed with City Staff, the intent of the two-way alley is to allow flexibility for maneuvering in/out of the site. It will function similar to other alley spaces used on other sites where drive aisles are two-way, but the width of the drive aisle is utilized for maneuverability. For example, alleys are proposed within the Form Based Code sites throughout Arlington, which are at the backs of the buildings, and intended to be service drives. They are two-way alleys, used as access to garages, and still used to maneuver in/out of loading spaces, which encroaches into the opposing lanes.

9. Will the stormwater vault on basement level capture stormwater from the roof only, or is it also expected to detain runoff from impervious areas on the property as well.
Applicant Response: The stormwater vault is intended to capture stormwater from the roof only.

10. Happy to see a green roof concept is already included.
Applicant Response: Acknowledged. Thank you for recognizing the green roof.

COMPLETENESS LETTER

1. SESP Checklist #10 SEE Elements (Use):
 - a. City Council authorized the execution of a second amendment to allow for an additional 35,000 GSF for the senior housing building. The executed second amendment is required before the City can begin its governmental review of this application.
Applicant Response: The Second Amendment has now been executed. The Applicant will continue coordinating with City Staff on the timing and logistics of the application review.

 - b. Retail square footage – 7,900 GSF indicated, which is a reduction from the projected 10,500 GSF shown in the SEE Amendment and SESP-Phase 1 documents for Block D-1. Provide confirmation that overall site retail GSF total still meets Voluntary Concession requirement of 117,600 GSF.
Applicant Response: The Applicant confirms that the aggregate retail square footage will comply with the requirements of the Voluntary Concessions, even with the proposed reduction in the amount of retail space on Block D-1. For more information, please refer to the enclosed letter from FCGP.

2. SESP Checklist #10 SEE Elements (Parking) and SESP Checklist #42: 125 parking spaces are indicated for senior housing, which is an increase from 75 shown in SEE Amendment and SESP-Phase 1 documents for the senior housing use. There is also a corresponding decrease in the amount of shared parking spaces with an increase in the parking reduction request. The consolidated application package states that the Applicant will purchase 125 parking spaces from FCGP Partners, or 0.58 spaces per unit, for Block D-1. Those spaces will be contained with the adjacent Block D garage.

Provide information on if the 125 spaces would be fully reserved 24/7 for the senior housing use, and a statement from FCGP that the decrease in shared parking spaces would still work with the other proposed uses on the site.

Applicant Response: The Applicant confirms that 125 parking spaces within the Block D garage will be made available on a 24/7 basis to support the senior living units on Block D-1. For more information, please refer to the enclosed letter from FCGP.

3. SESP Checklist #18 (Massing Model): Revised photo rendering of the senior housing building with realistic renderings of the other proposed buildings, as opposed to the “sugar cube” image provided in the application submission. See Attachment 1 for example from SESP.

Applicant Response: Revised renderings have been provided in the Supplement Packet dated February 15, 2022.

4. SESP Checklist #46: On sheets A-D1-400S and A-D1-401, more information is needed on how the number of bicycle parking spaces proposed were calculated per Sec. 48-1004, Table 4. This should include the number of short/long-term spaces per use, and the storage class per Sec. 48-1004, Table 5. Indicate number of short/long-term spaces and storage class that are to be provided by FCGP as part of the overall site development. Also include this bike parking tabulation information for senior housing building on civil plan sheet C-0202 in next submission.

Applicant Response: Updated bicycle parking information has been provided on sheet A-D1-400S.

5. Please submit the required fee in the amount of \$19,668.00.

Applicant Response: A check for the required filing fee has been submitted to the City under separate cover. The receipt for this payment is enclosed for reference purposes.

Thank you very much for your review of this request. Please do not hesitate to contact me if I can provide any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Zach Williams". The signature is written in a cursive, flowing style.

Zachary G. Williams

Enclosures