

Nan E. Walsh
(703) 528-4700 Ext. 5420
nwalsh@thelandlawyers.com



July 3, 2019

Via Hand Delivery

Ms. Arlova Vonhm
Zoning Administrator
Arlington County Zoning Office
2100 Clarendon Boulevard, Suite 1000
Arlington, VA 22201

Re: Major Site Plan Amendment – Site Plan #56
Properties: 1800 S. Bell St.; 1801 S. Bell St.; 1901 S. Bell St.; 1999 Jefferson Davis Highway; 1851 S. Bell (A/K/A 1900 Crystal Drive)
RPC Nos. 34-026-035, 034-026-037, 034-026-038, 034-026-039
Applicant: CESC Mall Land LLC
Cover Letter

Dear Ms. Vonhm:

Please find enclosed the final filing of an Administrative Regulation 4.1 Major Site Plan Amendment for the above-referenced Property.

I have included eight (8) copies of the following application materials for your review:

1. Acceptance letter;
2. Site plan application form;
3. Statement of support;
4. Disclosure statement;
5. Consent and authorization letters;
6. Modifications letter; and
7. Full- and half-size application drawings.

ATTORNEYS AT LAW

703 528 4700 ■ WWW.THELANDLAWYERS.COM
2200 CLARENDON BLVD. ■ SUITE 1300 ■ ARLINGTON, VA 22201-3359

LOUDOUN 703 737 3633 ■ WOODBRIDGE 703 680 4664

Please let me know if there is any additional information you need to review this submission.

Very truly yours,

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

Nan E. Walsh ZYNVC

Nan E. Walsh

Enclosures

cc: Jay Kelly
Eric Shullman
Nicholas Cumings
Caroline Herre



June 26, 2019

Nicholas Cumings
Walsh, Colucci, Lubeley & Walsh, P.C.
2200 Clarendon Blvd.
Suite 1300
Arlington, VA 22201

Re: 1900 Crystal Drive – New Site Plan, Rezoning, Block Plan Amendment, and Major Site Plan Amendment (SP #56) Application

BY EMAIL DELIVERY

Dear Nicholas,

The application that you filed on behalf of CESC Mall Land LLC for the properties located at 1800 S. Bell St., 1801 S. Bell St., 1901 S. Bell St., 1999 Jefferson Davis Highway, and 1851 S. Bell St. (1900 Crystal Drive) (RPC #34-026-035, -037, -038, -039) has been reviewed for compliance with the Administrative Regulation 4.1 submission standards. Staff has determined that the application meets the filing criteria. While the application meets the submission requirements, this in no way should be deemed as an endorsement of the proposal outlined in the application.

The application proposes to remove additional site area from Site Plan #56, rezone portions of the subject properties to the C-O Crystal City district and construct two new residential towers with ground floor retail for a total of 799,871 square feet of development, including 759,519 square feet of residential development (790 units) and approximately 40,352 square feet of retail. While the application meets the submission requirements, the applicant should be aware of the following preliminary issues identified by staff, and recognize that this is not a comprehensive list:

1. The applicant should continue to discuss the proposed site area for the final site plan with staff and a potential redesign to reflect the area of impact with the new residential buildings. As proposed, the site area appears to have been configured to reduce the amount of additional density that would need to be earned, which presents challenges for the current, and future site plans for the block. Staff would like the applicant to consider an approach to divide the future Center Park area into components that would then be allocated to each of the redevelopment projects on the block such that each project contributes equitably towards the achievement of the Sector Plan's goals. Please provide a comparison of the site area and density calculations for the applicant's proposed site area and for a site area methodology that would divide the site area currently occupied by the open space into equal portions.

2. As the Sector Plan did not call for a midblock connection, the applicant should work closely with County staff to discuss the proposed interim midblock connection and public plaza spaces in terms of how they could be designed, activated, and transitioned into the future center park space.
3. In the block plan and development documents, the applicant should provide calculations for the JK-3 (Mall IV as Office) in all scenarios except in scenario where Mall IV is removed to achieve full center park.
4. The applicant should be aware that additional block plan scenarios may be requested by staff and/or LRPC during review. The following scenarios should be explored:
 - Scenario showing the full center park and proposed two (2) 1900 Crystal Drive towers. This scenario might have variations that show removal of the proposed north/south midblock connection and associated retail, which were not envisioned in the Sector Plan.
 - Scenario showing the subject proposal with the current use of all existing buildings (i.e. office and hotel).

The comments outlined in the attached memorandum must be revised as part of the final submission.

For further comments and issues identified by County staff, please refer to the memorandums dated February 22, 2019, April 4, 2019, and May 3, 2019. The comments outlined in the attached memorandum dated June 14, 2019 must be revised as part of the final submission.

You may now proceed with submitting the final filing to the Zoning Office. In the final Site Plan Application, you will need to address how the proposed project meets County goals and is generally consistent with adopted planning guidance for the site. Adam Watson will be the Planning Division staff member coordinating the review of this project; he can be reached at awatson@arlingtonva.us or (703) 228-7926.

If you have any questions about this letter, please feel free to contact Mr. Watson.

Respectfully,



Claude A. Williamson, AICP, Director
Department of Community Planning, Housing & Development

cc: Samia Byrd, CMO
Stephen A. MacIsaac, CAO
Robert J. Duffy, FAICP, CPHD
Anthony Fusarelli, CPHD

Aaron Shriber, AICP, CPHD
Jennifer Smith, CPHD
Matt Mattauszek, CPHD
Adam Watson, CPHD
Margaret Rhodes, CPHD
Nicole Boling, CPHD



SITE PLAN APPLICATION

ARLINGTON COUNTY, VIRGINIA
DEPARTMENT OF COMMUNITY PLANNING, HOUSING AND DEVELOPMENT
ZONING DIVISION

2100 CLARENDON BOULEVARD SUITE #1000
ARLINGTON, VIRGINIA 22201
(703) 228-3883 • Fax (703) 228-3896

First Prelim Jan 11, 2019
Second Prelim March 15, 2019
Third Prelim April 15, 2019
Fourth Prelim May 23, 2019

In accordance with the requirements of Administrative Regulation 4.1, Site Plan Approval Procedure, the following plan is submitted for administrative review and transmittal to the County Board for its consideration.

Original Plan [] Amendment []

Case Number Site Plan #56 Date: July 3, 2019

Address: 1800, 1801, 1851, 1901 S. Bell Street and 1999 Jefferson Davis Hwy

Requested Use: The Applicant requests an amendment to Site Plan #56 to remove site area to be added to the new site plan for the redevelopment of 1900 Crystal Drive and approve the density of the remaining uses in Site Plan #56. The Applicant also proposes to amend the approved parking ratios for Site Plan #56 due to use of some of the existing, shared garage by the new site plan for 1900 Crystal Drive.

Drawings submitted [] Yes [] No

Print Name Of Owner CESC Mall Land LLC c/o JBG Smith Owner's signature Nan E. Walsh [] (REQUIRED)

Mailing Address: 4445 Willard Ave, #400

City Chevy Chase State MD Zip 20815 Phone

By: Nan E. Walsh, Attorney/Agent Print name Walsh, Colucci, Lubeley & Walsh, P.C. [] agent [] attorney, Signature Nan E. Walsh []

Mailing Address: 2200 Clarendon Boulevard, Suite 1300

City Arlington State VA Zip 22201 Phone 703-528-4700

(Office Use Only)
Date:
This application is scheduled for the County Board meeting of
Zone Receipt No. Fee Date Paid
Received by

Make checks payable to: Treasurer of Arlington County

(READ INFORMATION AND INSTRUCTIONS CAREFULLY)

**ARLINGTON COUNTY, VIRGINIA
DEPARTMENT OF COMMUNITY PLANNING, HOUSING AND DEVELOPMENT
ZONING DIVISION
2100 CLARENDON BOULEVARD SUITE #1000
ARLINGTON, VIRGINIA 22201
(703) 228-3883 • Fax (703) 228-3896**

Disclosure Statement

TYPE OR PRINT IN INK

Case No. _____

Complete the following:

1. Description of the real estate affected

List the addresses of all property that is affected by the application. Provide the lot, block, section, and sub-division of all parcels **only** if the properties have not been subdivided.

Address(es) 1800, 1801, 1851, 1901 S. Bell Street and 1999 Jefferson Davis Hwy

Lot(s) RPC# 034-026-035, -037, -038, -039 Block _____

Section _____ Subdivision South Washington Industrial Subdivision

2. Is the owner of said real estate, a corporation whose stock is traded on a national or local stock exchange and having more than five hundred (500) shareholders?

YES

NO

If "Yes," give the name of the corporation and skip to item 4

3. List the names, addresses, and nature of interest of **ALL** persons having equitable ownership of the real estate to be affected, including, in the case of corporate ownership, the names of stockholders, officers, and directors; and of **ALL** parties in interest.

<u>PARCEL ADDRESS</u>	<u>NAME</u>	<u>ADDRESS</u>	<u>NATURE OF INTEREST</u>
1851 S Bell Street	CESC Mall Land LLC	4445 Willard Ave #400	Please see attached
	c/o JBG Smith	Chevy Chase, MD 20815	

4. I hereby certify that this is a true and accurate disclosure of all persons having equitable ownership real estate to be affected and of all the parties in interest.

Applicant's signature Nan E. Walsh ^{3y MWC}

Walsh, Colucci, Lubeley & Walsh, P.C.

Applicant's address 2200 Clarendon Blvd, Suite 1300, Arlington, VA 22201

STATE OF VIRGINIA, COUNTY OF Arlington TO WIT: _____

Subscribed and sworn before me this 3 day of July, 20 19

Notary Kimberly K. Follin

My commission expires 11/30/2019



Disclosure Statement Attachment

CESC Mall Land L.L.C., a Delaware limited liability company

Officers: David Paul, President & COO; Steven Museles, Chief Legal Officer & Secretary; Stephen Theriot, CFO & Treasurer; Patrick Tyrell, CAO; Donna Wagner, SVP, Director of Tax; Livya Antonacci, Asst. Secretary; Aaron Herman, Asst Secretary; Kathryn Clement, Assistant Secretary; Edward Dunlap, Assistant Secretary, Michael Kelley, Assistant Secretary, Shawn Kyle, Assistant Secretary

Crystal City Development L.L.C., Managing Member, Sole Member

JBG/Fund VI Transferred, L.L.C., Managing Member

JBG SMITH Properties LP, Managing Member

JBG SMITH Properties, a Maryland REIT

JBGS/TRS, L.L.C., Member

JBG SMITH Properties LP

JBG SMITH Properties, a Maryland REIT

Charles E. Smith Commercial Realty LP, Member

JBGS/Commercial Realty Gen-Par, L.L.C., General Partner

JBG SMITH Properties LP – Sole Member

JBG SMITH Properties, a Maryland REIT

JBG Smith Properties LP, Limited Partner

JBG SMITH Properties, a Maryland REIT

JBGS/Hotel Owner, L.L.C.

JBG SMITH Properties LP – Sole Member

JBG SMITH Properties, a Maryland REIT

December 19, 2018

Via Hand Delivery

Arlova Vonhm
Zoning Administrator
Arlington County Zoning Department
2100 Clarendon Boulevard, 10th Floor
Arlington, Virginia 22201

Re: Consent and Authorization
Property: 1851 S. Bell St. (a/k/a 1900 Crystal Drive)
RPC No: 34-026-037
Owner/Applicant: CESC Mall Land L.L.C.

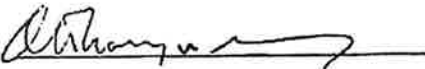
Dear Ms. Vonhm:

As title owner of the above-referenced Property, CESC Mall Land L.L.C. consents to the filing of a special exception site plan, major site plan amendment, Crystal City Block Plan amendment application, rezoning, and any related applications for the Property, including vacation and encroachment applications.

CESSC Mall Land L.L.C. hereby appoints Walsh, Colucci, Lubeley & Walsh, P.C. to act as agent on our behalf for the filing of a special exception site plan, major site plan amendment, Crystal City Block Plan amendment application, rezoning and any related applications for the Property, including vacation and encroachment applications. Please direct all correspondence relative to the above-referenced applications to Nan E. Walsh and/or Nicholas V. Cumings at Walsh, Colucci, Lubeley & Walsh, P.C.

Very truly yours,

CESSC Mall Land L.L.C.

By: 

Name: Anthony W. Greenberg
Title: Authorized Signatory

January 2, 2019

Via Hand Delivery

Arlova Vonhm
Zoning Administrator
Arlington County Zoning Department
2100 Clarendon Boulevard, 10th Floor
Arlington, Virginia 22201

Re: Consent Letter
Property: 1999 Jefferson Davis Highway
RPC Nos: 34-026-035
Applicant: CESC Mall Land, L.L.C.
Owner: JBGS/Hotel Owner, L.L.C.

Dear Ms. Vonhm:

JBGS/Hotel Owner, L.L.C. consents to the filing of a special exception site plan, major site plan amendment, Crystal City Block Plan amendment application, rezoning, and any related applications for the Property, including vacation and encroachment applications, by the Applicant.

Please direct all correspondence relative to the above-referenced applications to Nan E. Walsh and/or Nicholas V. Cumings at Walsh, Colucci, Lubeley & Walsh, P.C.

Very truly yours,

JBGS/HOTEL OWNER, L.L.C.



By: _____

Name: Aaron F. Herman

Title: Assistant Secretary

Bloomberg BNA

June 20, 2018

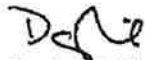
Ms. Arlova Vonhm
Zoning Administrator
ARLINGTON COUNTY
2100 Clarendon Boulevard, Suite 812
Arlington, Virginia 22201

**RE: AUTHORIZATION FOR APPLICATIONS FOR REZONING AND SITE PLAN AMENDMENT
AND ALL OTHER RELATED LAND USE APPLICATIONS WITH ARLINGTON COUNTY
FOR THE DEVELOPMENT TO BE KNOWN AS 1900 CRYSTAL DRIVE – CRYSTAL CITY,
ARLINGTON**

Dear Ms. Vonhm:

The undersigned is the title owner of 1801 S. Bell Street, RPC Numbers 34026038, 34026039, and 34026040, in Crystal City, Arlington, Virginia. The purpose of this letter is to consent to the filing of an amendment to Site Plan #56 and all related land use applications. The boundaries of Site Plan #56 include land on which the undersigned's building is located.

Sincerely,



Daniel M. Fine
Chief Operating Officer

STATE OF Virginia

CITY/COUNTY OF Arlington TO WIT: _____

On this 20 day of JUNE, 2018, before me, a Notary Public in and for said jurisdiction, personally appeared Daniel M. Fine, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he/she executed the same for the purposes therein contained.

Given under my hand and official seal, this 20 day of JUNE, 2018.



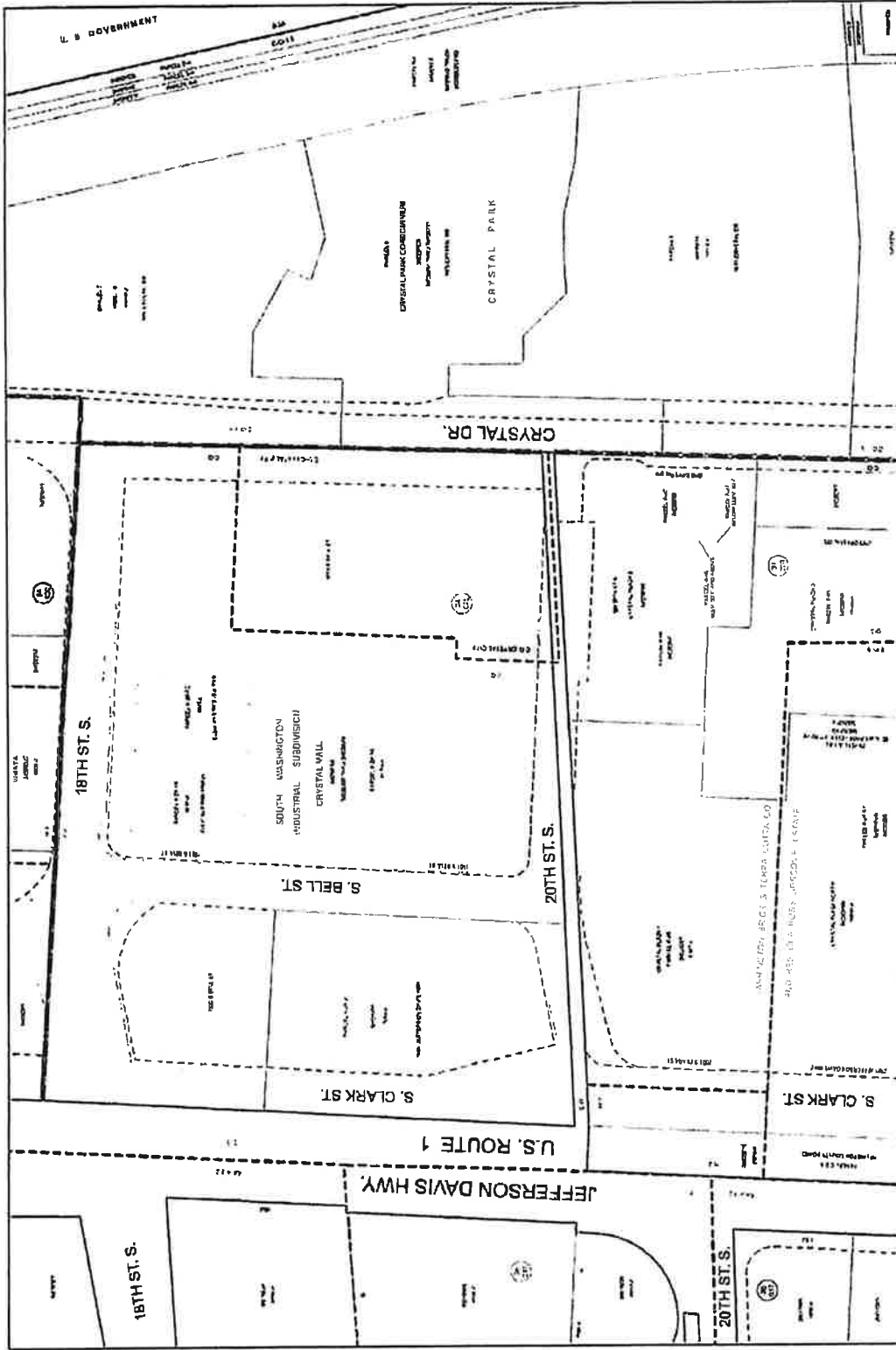
Laura Balhoun Padilla
Notary Public

My Commission Expires: 02/28/2022

Registration Number: 7595256



ARLINGTON COUNTY, VIRGINIA REAL PROPERTY IDENTIFICATION MAP



As shown on this map, the boundaries of the lots are shown as they appear on the ground. Any change in the boundaries of the lots shown on this map shall be shown on a subsequent map. The boundaries of the lots shown on this map are not to be construed as a guarantee of the accuracy of the map. The boundaries of the lots shown on this map are not to be construed as a guarantee of the accuracy of the map.

Map prepared by the Office of the Surveyor, Arlington County, Virginia. The map is based on the latest available aerial photography and ground surveys. The map is not to be construed as a guarantee of the accuracy of the map.

© 2017 ARLINGTON COUNTY, VIRGINIA
1 2 3 4 5 6 7 8 9 10 11 12



18-1	18-2	18-3	18-4
19-1	19-2	19-3	19-4
20-1	20-2	20-3	20-4

Map Sheet: 75-16



**WALSH COLUCCI
LUBELEY & WALSH PC**

Nan E. Walsh
(703) 528-4700 Ext. 5420
nwalsh@thelandlawyers.com

July 3, 2019

Via Hand Delivery

Ms. Arlova Vonhm
Zoning Administrator
Arlington County Zoning Office
2100 Clarendon Boulevard, Suite 1000
Arlington, Virginia 22201

**Re: Major Site Plan Amendment
Site Plan #56
Statement of Support
Properties: 1800 S. Bell St.; 1801 S. Bell St.; 1901 S. Bell St.; 1999 Jefferson
Davis Highway; 1851 S. Bell (A/K/A 1900 Crystal Drive)
RPC Nos. 34-026-035, 034-026-037, 034-026-038, 034-026-039
Applicant: CESC Mall Land LLC**

Dear Ms. Vonhm:

On behalf of the Applicant, please accept the following as a statement of support for a major amendment to Site Plan #56. In conjunction with the Applicant's application for a new site plan for the redevelopment of 1900 Crystal Drive, the Applicant will remove additional site area from Site Plan #56 to support its proposed development. This change will require an amendment to Site Plan #56 to approve the resulting density of the site plan. The Applicant is also proposing new parking ratios for existing uses in Site Plan #56 to account for the use of parking spaces within the existing garage by the 1900 Crystal Drive development. The Applicant also requests to relocate the loading dock serving the 1901 South Bell office building to another location within Site Plan #56, but reduce its size from two loading bays to one.

Site Plan #56 permits a mixed-use development consisting of four office buildings, a hotel, and retail uses located primarily within the portion of the Crystal City Underground that passes through the site. This development was named "Crystal Mall." The Site Plan was originally approved for 1,129,628 square feet of office gross floor area ("GFA"), 21,834 square feet of retail GFA, and 340 hotel rooms. It has been amended several times over the years since its approval. Per the previously approved Block Plan and staff report for Site Plan #421, the expired site plan approval for 1900 Crystal Drive, the following table describes the existing buildings:

ATTORNEYS AT LAW

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2200 CLARENDON BLVD. ■ SUITE 1300 ■ ARLINGTON, VA 22201-3359

LOUDOUN 703 737 3633 ■ WOODBRIDGE 703 680 4664

Building	Office	Retail	Hotel	Total
Mall I	226,496 sf	26,628 sf		253,124 sf
Mall II	312,858 sf			312,858 sf
Mall III	399,439 sf	2,496 sf		401,935 sf
Mall IV	317,009 sf	1,992 sf		319,001 sf
Crystal City Marriott			218,781 sf	218,781 sf
TOTAL	1,255,802 sf	31,116 sf	218,781 sf	1,505,699 sf

Information provided from Crystal City Block Plan JK-1

Mall I is 1800 S. Bell St. Mall II is the BNA office building, or 1801 S. Bell. Mall III is 1851 S. Bell St./1900 Crystal Drive, or the vacant office building the Applicant proposes to demolish. Mall IV is 1901 S. Bell St.

On September 15, 2012, the County Board approved an amendment to Site Plan #56 for the removal of 133,956 square feet of site area for Site Plan #421. The resulting site area for Site Plan #56 was 279,282 square feet. This amendment was approved in conjunction with Site Plan #421, or the previous site plan approval for 1900 Crystal Drive, which has lapsed. The Board permitted the existing density to be retained in Site Plan #56 following the removal of the site area to exceed 3.8 FAR, and permitted the amount of existing parking spaces to serve the uses remaining in the site plan to exceed a parking ratio of 1 space per 530 square feet. On June 16, 2018, the Board approved another amendment to Site Plan #56 which again modified the approved parking ratio. This amendment permitted a ratio of one parking space per 588 square feet of gross floor area, excluding hotel gross floor area, for Site Plan #56.

The site area for the Applicant's new site plan application is 158,767.44 square feet. The site area for the lapsed Site Plan #421 was 133,956 square feet. The Applicant requests to remove an additional 24,811.44 square feet from Site Plan #56. The resulting site area for Site Plan #56 will be 254,470.56 square feet, or 5.84 acres, with an effective FAR of 4.34.

The Applicant also requests to relocate the loading dock serving 1901 South Bell to another location within Site Plan #56. This relocation will enable the Applicant to construct new retail in the 1900 Crystal Drive development located at the entrance of the existing loading dock. The Applicant also proposes to reduce the capacity of this dock from two loading bays to one. However, the proposed loading dock is longer than the existing loading docks and deep enough to accommodate one 55' loading truck for tenant move in/move out. Additionally, the deeper loading dock can accommodate two smaller delivery trucks stacked in a row. Based on years of experience managing the property, the Applicant believes that there is sufficient loading capacity to serve the 1901 South Bell office building in the relocated dock.

The 1900 Crystal Drive development will also use 252 parking spaces in the existing garage and construct 301 parking spaces in a new garage which will be fully connected to the existing garage. The use of the existing spaces for 1900 Crystal Drive and changes to the garage required by the demolition of the existing office building and new construction will change the available parking supply for the existing uses in Site Plan #56. There will be approximately 1,753 parking spaces in the new shared garage. The Applicant therefore proposes to park the existing and proposed development as follows:

- Crystal City Marriott at a ratio of .44 spaces per hotel unit,
- Office uses (Mall I and Mall II) at 1 space per 882 square feet,
- New residential development at 1900 Crystal Drive at a ratio of .70 spaces per residential unit,
- All retail on the block at a ratio of 1 space per 951 square feet of retail,
- Designate the remaining parking supply of 108 parking spaces as “flexible use” spaces that could be allocated to any use, including public parking, as managed by the Applicant.

A chart detailing the current parking allocation, proposed parking allocation, and zoning ordinance requirements, factoring in reductions for proximity to metro, is attached.

Thank you for your time and attention to this matter. Please do not hesitate to contact me if you require any additional information about the application.

Very Truly Yours,

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

Nan E. Walsh 3, NYC

Nan E. Walsh

Enclosures

cc: Jay Kelly
Eric Shullman
Nicholas V. Cumings
Caroline Herre

1900 Crystal Drive
Parking Analysis

Use	Existing		Proposed		Zoning Ordinance Requirements and Modifications		
	Spaces	Parking Ratio	Spaces	Parking Ratio	Zoning Ord. Parking Requirement in C-O (Section 7.13.5)	Zoning Ord. Parking Requirement for a site plan in C-O-CC (Section 7.16.5 H)	Modifications Requested
Hotel	307	0.9 per room	150	0.44 per room	0.7 spaces per room	0.5 spaces per room	Parking Reduction for Hotel
Office	1,527	1 per 822 sf	892	1 per 882 sf	1 per 530 sf	1 per 1,000 sf	Sufficient Parking for Office in CC
Residential	-	-	553	0.70 per unit	1 space per dwelling unit	1.125 per unit up to 200 units; 1 per unit above 200 units	Parking Reduction for Residential
Retail	53	1 per 587 sf	50	1 per 951 sf (inc. 108 flex)	1 per 530 sf, or 90 spaces	1 per 1,000 sf, or 48 spaces	Parking Reduction for Retail*
Total	1,887		1,753				

Site Plan #56 - proposed	
Use	
Hotel	150
Office	892
Residential	-
Retail (shared)	50
Flex	108
Total	1,200

Proposed SP	
Use	
Residential	553

*The Applicant requests a parking reduction per Section 14.3.6.A.2 of the ACZO, which provides that retail and service commercial uses for the first 5,000 square feet of floor area per main building which are located within 1000 square feet of a Metro Station are exempted from parking requirements. The Applicant requests that exemption for each building in Site Plan No. 56 and in the new site plan.

**A Minor Site Plan Amendment was approved for Site Plan #56 to amend the commercial parking ratio to 1 per 588 sf, excluding the hotel.

Site Plan #56

	Prior to SP #421	Approved with Lapsed SP #421	Proposed
Site Area	413,238	279,282	254,470.56
Effective FAR	3.64	3.95	4.34
GFA	1,505,699	1,103,764	1,103,764
Removed from SP #56	--	133,956	158,767.44

GFA by Building	
Mall I	253,124
Mall II	312,858
Mall III	401,935
Mall IV	319,001
CC Marriott	218,781
Total	1,505,699
Total (minus Mall III)	1,103,764

Nan E. Walsh
(703) 528-4700 Ext. 5420
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**WALSH COLUCCI
LUBELEY & WALSH PC**

July 3, 2019

Via Hand Delivery

Ms. Arlova Vonhm
Zoning Administrator
Arlington County Zoning Office
2100 Clarendon Boulevard, Suite 1000
Arlington, VA 22201

**Re: Major Site Plan Amendment – Site Plan #56
Properties: 1800 S. Bell St.; 1801 S. Bell St.; 1901 S. Bell St.; 1999 Jefferson
Davis Highway; 1851 S. Bell (A/K/A 1900 Crystal Drive)
RPC Nos. 34-026-035, 034-026-037, 034-026-038, 034-026-039
Applicant: CESC Mall Land LLC
Zoning Modifications Letter**

Dear Ms. Vonhm:

On behalf of the Applicant, please accept this Modifications Letter in fulfillment of the Administrative Regulation 4.1 filing requirements. The Applicant requests the following modifications:

- Reduced parking ratios;
- Compact parking spaces;
- Reduced loading requirement; and
- All other modifications necessary to achieve the proposed plan.

Please let me know if there is any additional information you need to review this application.

Very truly yours,

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

Nan E. Walsh *3yMC*

Nan E. Walsh

Enclosures

cc: Jay Kelly
Eric Shullman

Nicholas Cumings
Caroline Herre

ATTORNEYS AT LAW

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2200 CLARENDON BLVD. ■ SUITE 1300 ■ ARLINGTON, VA 22201-3359

LOUDOUN 703 737 3633 ■ WOODBRIDGE 703 680 4664

{A0870664.DOCX / 1 SP #56 Modifications Letter 07.03.19 000099 000219}