

June 10, 2022

Ashley S. Labadie, AICP
Urban Planner III | Land Use Services
Department of Planning and Zoning
City of Alexandria
301 King Street, Room 2100
Alexandria, VA 22314

**Re: 3908 Elbert Avenue - CDSP#2022-00010
Concept #1 | City Compiled Comments**

Dear Ashley,

This letter shall serve as our formal “comment/response” letter for the Concept I Comments dated 04/28/2022 for the above referenced project. The comments and their associated responses are as follows:

PLANNING AND ZONING

Comment 1: Beginning with the first submission and continuing with each subsequent submission, all changes from the previous submission shall be addressed either in a separate narrative or within the comment’s response portion of your letter.

Response: Acknowledged.

Comment 2: Submitting via APEX for an existing project:
a. Continue to alert staff (planapplications@alexandriava.gov and owen.albrecht@alexandriava.gov) and the project manager PRIOR to the next submission.
b. Once Staff have reopened the project portal, you will receive a notification with instructions on how to proceed.

Response: Acknowledged.

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Comment 3: Please visit the City webpage, alexandriava.gov/permits, for additional information about the submittal process, or contact the project manager with whom you've been working.

Response: *Acknowledged.*

Findings:

Comment 4: The proposed development is within the Arlandria-Chirilagua Small Area Plan (SAP) and meets the area's land use, building heights, and open space recommendations of the SAP. (NPCD)

Response: *Acknowledged.*

Comment 5: The applicant requests to rezone the property to RMF/Residential Multifamily Zone, which allows a floor area of 3.0 with a Special Use Permit if the applicant commits to providing committed affordable housing and is in compliance with the following requirements:

- a. The committed affordable housing shall be equivalent to at least one third of the increase in the floor area ratio above the maximum permitted in section 3-1405(A).
- b. An affordable housing plan and a relocation plan shall be submitted consistent with published city standards for such plans.
- c. Rents payable by households for the committed affordable units shall not, on average, exceed the maximum rents allowed under the Federal Low-Income Housing Tax Credit program for households with incomes at 40 percent of the area median income for the Washington D.C. Metropolitan Statistical Area. Average rents payable by households for the committed affordable units may be increased up to the maximum rents allowed under the Federal Low-Income Housing Tax Credit program for households with incomes at 50 percent of the area median income for the Washington D.C. Metropolitan Statistical Area subject to the submission of a revised affordable housing plan. Any existing housing assistance payment contract in effect as of March 16, 2019 and any extension thereof or new contract which maintains the material aspects of the existing contract shall be deemed to be in compliance with this subsection. (P&Z)

Response: *Acknowledged.*

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Comment 6: The proposed development shall comply with the City's [2019 Landscape Guidelines](#), which were approved in February 2019. (P&Z)

Response: *Acknowledged, the provided submission complies with applicable City of Alexandria guidelines and requirements.*

Comment 7: The proposed development shall comply with the City's [2019 Green Building Policy](#). (P&Z)

Response: *Acknowledged, see P-0201 for green building note and reference the attached green building narrative.*

Comment 8: The proposed project is exempt from the City's [Public Art Policy](#); however, staff highly encourages incorporation of culturally relevant public art with this project. (P&Z)

Response: *Acknowledged.*

Comment 9: The proposed project falls within the remapped FEMA 100-year flood plain, which will be finalized this year. (P&Z)

Response: *Acknowledged.*

Comment 10: Please note that this development plan will need to be reviewed by the Parks and Recreation Commission as well as Housing Affordability Advisory Committee (AHAAC). Ensure meetings with these City commissions are included in the project timeline. (P&Z)

Response: *Acknowledged.*

Comment 11: Please note that this development plan will need to incorporate community engagement. Ensure engagement events are included in the project timeline. (P&Z)

Response: *Acknowledged.*

Comment 12: The parking ratio for multifamily dwellings with affordable housing, Section 8-200(2)(a)(iii), applies to this proposal. Concept 1 employs Section 8-200(2)(a)(iii)(a) for households earning at or below 60 percent of AMI as well as Section 8-200(2)(a)(iii)(d)(B) which indicates parking may be further reduced by five percent if within one-quarter mile of four or more active bus routes. (P&Z)

Response: *Acknowledged. The parking tabulations have been updated based on the revised unit mix. See P-0101.*

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Comment 13: Proposed parking will be further analyzed with future submissions. (P&Z)

Response: *Acknowledged.*

Comments:

Comment 14: Provide a general schedule of noted Commissions meetings and community events to be held for this project.

- d. The applicant will continue to engage the Arlandria-Chirilagua neighborhood and the applicable civic associations and provide at least two in-person (virtual if mandated) community engagement event with community leaders and its members. (P&Z)
- e. One of the community engagement events will discuss the Concept #2 site plan prior to preliminary plan submittal and one will discuss the preliminary plan after submittal. Provide staff with the event information (in English and Spanish) and send the meeting presentation to staff prior to the event. Staff will send out a city eNews for the events. (P&Z)

Response: *Acknowledged. Please see attached draft entitlement schedule that includes such information.*

Comment 15: Adjust parking ratios per Section 8-200(2)(a)(iii) as the level of affordability for units is further defined. (P&Z)

Response: *The parking tabulations have been updated based on the revised unit mix and affordability rates. See P-0101.*

Comment 16: Provide a narrative of current parking usage describing whether it is adequate, under used, or exorbitant. (P&Z)

Response: *Please see the attached Trip Generation and Parking Justification Memo from Gorove Slade which include that information in Table 4 and 5 therein.*

Comment 17: Consider 10 percent parking reduction offered by Section 8-200(2)(a)(iii)(d)(C) by providing a walkability index score of 90-100. (P&Z)

Response: *Based on review of the surrounding business and amenities, The site does not meet the walkability index score identified in the comment.*

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Comment 18: Provide active uses on the ground floor fronting Elbert Avenue, including but not limited to an indoor community space. Residential use may be provided on the ground floor if constructed one foot above base flood elevation. (P&Z)

Response: *See Ground Floor Plan A/A1.1 for provided active uses, including managers' offices, entry lobby and community space on the ground floor fronting Elbert Avenue. The finish floor elevation at these locations is at least one foot above base flood elevation.*

Comment 19: Incorporate a variety of height to avoid abrupt transitions with surrounding existing development. Pursue step backs along Elbert Avenue starting at level four instead of level five. (P&Z)

Response: *See A2.1 and A3.1 for proposed elevations and sections. A variety of design features have been incorporated into the overall massing in order to transition with the surrounding development, such as:*

- *The second floor courtyard is oriented toward Elbert Ave to provide a substantial building break along the street frontage.*
- *The ground floor community room has been given its own prominent entrance and façade as an component of the building massing.*
- *Terraces at the sixth floor have been provided to lower the massing along Elbert Ave.*
- *Between the fourth and fifth floors the façade material changes, open balconies and the façade steps in to further step down to the surrounding development*
- *Balconies as an internal component of the building massing have been provided at the building corners in order to provide more porosity at building corners.*

Comment 20: Provide a minimum 16' wide streetscape consistent with Neighborhood Residential Streets as shown on pg. 50 of the Arlandria-Chirilagua SAP and the intent of Condition #90 of the SAP. (NPCD)

Response: *As discussed with Staff, a 16' wide streetscape is now provided including a 6' sidewalk abutting the roadway and a 10' landscape strip behind the sidewalk for street trees (including the retention of two (2) existing trees). See P-0401.*

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Comment 21: Show proposed improved sidewalk starting from back of curb to ensure preservation of existing trees along Elbert Avenue to the greatest extent. (P&Z)

Response: *As discussed with Staff, a 16' wide streetscape is now provided including a 6' sidewalk abutting the roadway and a 10' landscape strip behind the sidewalk for street trees (including the retention of two (2) existing trees). See P-0401.*

Comment 22: Consolidate drives/curb cuts into one along the south side of the property to preserve existing street trees. (P&Z)

Response: *The driveways have been consolidated into one driveway on the south side of the property, see P-0401.*

Comment 23: Move garage entry to the side or rear of the property and provide garage door designs. (P&Z)

Response: *The garage entry has been moved to the south side of the building utilizing the existing curb cut. see P-0401, A/A1.1 and B/A2.1. A garage door has been shown on the elevation, see B/A2.1.*

Comment 24: Revise open space calculations in the zoning table to include above ground open space. (P&Z)

Response: *See updated open space tabulations and graphics on sheets P-0101 and P-0402.*

Comment 25: Provide a tree survey with tree removal and protection plan consistent with the [2019 Landscape Guidelines](#). (P&Z)

Response: *See P-1201 for tree protection plan.*

Comment 26: Evaluate how existing residents use the existing at-grade courtyard as a resident gathering space to inform the design of the proposed at-grade open space along Elbert Avenue. (NPCD)

Response: *Additional details and design will be provided for the above grade open space with the DSUP based on the CLI anticipated programming for the building.*

Comment 27: Provide the required green building narrative and elements according to the checklist with the next submission. (P&Z)

Response: *The green building narrative has been provided as a separate document.*

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Comment 28: Proposed Floor Area Ratio and permissible exclusions will be determined per Section 2-145(B) of the Zoning Ordinance. With the next submission provide an FAR breakdown according to the Zoning Ordinance. (P&Z)

Response: *FAR Calculations are shown on sheet A1.1 and A1.2. Exclusions from FAR are depicted hatched on the floor plans.*

Comment 29: Provide architectural detail and massing diagrams with the next submission. (P&Z)

Response: *Architectural elevations are provided on Sheet A2.1. Massing compatibility with neighboring buildings are shown on the sections on sheet A3.1.*

A. OFFICE OF HOUSING

Comments:

Comment 30: It is noted that the applicant is requesting a rezoning to the RMF Zone to redevelop 28 existing committed affordable rental units in order to expand housing opportunity, including deeply affordable housing consistent with the housing priorities of the 2021 Arlandria-Chirilagua Small Area Plan and the mission of [Community Lodgings, Inc.](#) in the community. Pursuant to the RMF Zone, one third of the increase in density above the first 0.75 FAR secured through the proposed rezoning, shall be affordable, on average, to households with incomes at 40% of the area median income. With the next submission, the applicant shall identify the breakdown of the level of affordability of the units. (Housing)

Response: *Acknowledged.*

Comment 31: Continue discussions with Housing staff regarding income-targeting and financing of the development concept and coordinate with Housing staff on the timing of Low-Income Housing Tax Credits (LIHTC) applications. (Housing)

Response: *Acknowledged.*



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Comment 32: With the next submission, provide a draft timeline for the completion of Section 106 requirements and the environmental assessment, if applicable, based on federal regulations. (Housing)

Response: *The Applicant has retained the services of Wetland Studies and Solutions, Inc. to initiate the request for a Project Review from the Department of Historic Resources. Additional information on the schedule will be provided once more information is received as part of that initial process.*

Comment 33: Include Housing staff in all public community meetings and advise staff on the timing of resident meetings. (Housing)

Response: *Acknowledged.*

Comment 34: Submit a draft Affordable Housing Plan, as described in Part C of the City of Alexandria Procedures Regarding Affordable Housing Contributions, at least three weeks prior to the Completeness submission. Following staff review, the applicant will present the Affordable Housing Plan to the Alexandria Housing Affordability Advisory Committee for feedback prior to the application's consideration by Planning Commission. The City's guidelines on AHPs can be accessed online at https://www.alexandriava.gov/uploadedFiles/housing/info/2019AffordableHousingPlanGuidelines_03.18.19.pdf (Housing)

Response: *Acknowledged., it will be provided in accordance with this request.*

Comment 35: Submit a Relocation Plan consistent with the RMF Zone Tenant Assistance Relocation Policy which requires a draft Relocation Plan be submitted with the Concept 2 submission; the Policy can be accessed online at <https://media.alexandriava.gov/docs-archives/housing/info/rmfzone=tenantassistancerelocationpolicy=final.pdf>. Following staff review, the applicant will present the Relocation Plan to the Landlord Tenant Relations Board prior to the application's consideration by Planning Commission. (Housing)

Response: *Acknowledged.*

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Comment 36: The applicant is encouraged to incorporate universal design to enable residents to age-in-place and improve the safety and utility of housing for people with disabilities and visitability features to ensure new residential properties are accessible to people regardless of their physical abilities. (Housing)

Response: *Acknowledged.*

B. RECREATION, PARKS, AND CULTURAL ACTIVITIES (RPCA)

Comments:

Comment 37: Provide seating and landscaping that can withstand dogs within the at grade open space. (RP&CA)

Response: *See landscape sheets for conceptual landscape design. Additional details and design will be provided for the at grade open space with the DSUP based on the CLI anticipated programing for the building.*

Comment 38: Activate the above grade open space with programming such as community garden, areas for grills, picnic areas, and gathering areas to support resident needs. (RP&CA)'

Response: *Additional details and design will be provided for the above grade open space with the DSUP based on the CLI anticipated programing for the building.*

C. TRANSPORTATION & ENVIRONMENTAL SERVICES

Findings:

Comment 39: Public Works Services have no comments.

Response: *Acknowledged.*

Comment 40: Resource Recovery, Dash, and VAWC provided no comments.

Response: *Acknowledged.*

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Comment 41: Explore pushing the building footprint closer to the property line and provide a drive aisle around back for trash pick-up and loading. (Transportation Planning)

Response: *The building cannot be located closer to the property line due to a deed BRL established with the underlying subdivision. The loading/trash has been relocated to the southern side yard. See C-0401.*

Comment 42: Consider providing an alley or sidewalk connection through Elbert Avenue to Old Dominion or Charles Avenue. If an alley connection is feasible, consider relocating the loading space and garage entrance from Elbert Avenue. (Transportation Planning)

Response: *There is no ability to connect to the suggested roads from the applicant's property. Adjacent properties to the west are private and the City has no Right-of-way or easement to connect to.*

Comments:

Complies with Floodplain Requirements. (Floodplain)

Response: *Acknowledged.*

Comment 43: The next submission must be prepared per the requirements of Stage II Concept Submission and Memorandum to Industry 02-09 dated December 3, 2009. (D-ROW)

Response: *Acknowledged, the provided submission complies with applicable City of Alexandria guidelines and requirements.*

Comment 44: Provide details and supporting calculations for storm water management design that include adequate outfall analysis. Include a complete drainage area map, in acres, including all off-site drainage areas, supported by an outlined contour map. (D-ROW)

Response: *The stormwater outfall analysis is now provided on P-0704.*

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Comment 45: Provide preliminary computations on generation of pre and post development runoff from the site using the rainfall depths for the City of Alexandria as: 1 Yr 24 hour = 2.70, 2 Yr 24 hour = 3.20 and 10 Yr 24 hour = 5.20 inches per NRCS (formerly SCS) TR-55 method. The overland relief shall be provided for 100 Yr 24 hour = 8.2 inches of rainfall depth in the final site plan. (D-ROW)

Response: *See P-0702 and P-0703 for stormwater quantity and quality analysis.*

Comment 46: The project will be required to meet the state phosphorus stormwater quality and quantity requirements, as well as the Alexandria water quality volume default as specified in the Environmental Management Ordinance (Article XIII of the City's zoning ordinance). (SWM)

Response: *See P-0702 and P-0703 for stormwater quantity and quality analysis.*

Comment 47: Per Memo to Industry No. 01-18, a minimum of 65% of the total phosphorus (TP) removal required by the Virginia Stormwater Management Program (VSMP) must be achieved using nonproprietary surface BMPs approved by the Virginia Stormwater BMP Clearinghouse. A maximum of 35% of the TP removal required by the VSMP may be achieved using manufactured treatment devices (MTDs) and/or sand filters approved by the Virginia Stormwater BMP Clearinghouse. Any approved BMP may be used to meet the balance of the Alexandria Water Quality Volume Default (WQVD). MTDs may not be used on single-family detached residential projects. Concept site plan submittals are encouraged to submit conceptual stormwater layouts to ensure plans meet these requirements early in the site plan process. This layout includes approximate locations and types(s) of facilities proposed. Projects must demonstrate compliance with these policies during the site plan process no later than Verification of Completeness for site plans and Final 1 for grading plans. (SWM)

Response: *A minimum of 65% of the phosphorous requirement is achieved using nonproprietary surface BMPs (urban bio-retention). See P-0701 – P-0703 for conceptual stormwater management analysis.*

Comment 48: Add a sanitary sewer outfall narrative to calculate the sanitary flow from the proposed development site. (Sanitary)

Response: *Sanitary sewer outfall narrative is provided on P-0201.*

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Comment 49: If the increase in peak sanitary flow from the proposed project is over 10,000 gpd, provide a sanitary sewer adequate outfall analysis (AOA) in accordance with Memo to Industry 06-14 as part of the preliminary plan submission.

- a) The analysis shall be completed from the tie-in sewer (008413SEWP per City's sewer GIS) to the 30" trunk sewer (009358SEWP per the City's sewer GIS).
- b) The City maintains a hydraulic model of a portion of its collection system. The applicant may use the flow and survey information for the AOA. The flow and survey data will be provided at the next development plan review submission. (Sanitary)

Response: *Sanitary sewer adequate outfall analysis will be provided with future DSUP application, see note on P-0201.*

Comment 50: Provide peak hour trip generation (Traffic Engineering)

Response: *A peak hour trip generation calculation is now provided on P-0101.*

Comment 51: The two parking spaces at the garage entrance will have a very limited sight distance. Provide an adequate sight distance for the two spaces, otherwise remove the spaces for safety concern. (Traffic Engineering)

Response: *The new parking garage layout has resolved this issue, see revised turning movements on P-1101 – P-1103.*

Comment 52: Provide turning movement with car parking in the middle southern parking area. (Traffic Engineering)

Response: *The new parking garage layout has resolved this issue, see revised turning movements on P-1101 – P-1103.*

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Comment 53: Provide turning movement getting in and out of loading dock with cars parking along Elbert Avenue (Traffic Engineering)

Response: *The new layout has resolved this issue, see revised turning movements on P-1101 – P-1103. A no parking sign has been added 15’ to the north of the proposed fire hydrant this means no cars will be parking near the curb cut so the loading movements will not experience difficulty maneuvering into/out of the driveway.*

Comment 54: Provide bike parking consistent with [Alexandria’s Bike Parking Requirements](#). (Transportation Planning)

Response: *Bike parking computation has been added to P-0101 and bike parking locations are identified on P-0401 and A1.1.*

Comment 55: Sidewalks shall be flush across all driveway crossings. (Transportation Planning)

Response: *Acknowledged, the sidewalk/driveway design provided includes a flush sidewalk. See P-0401.*

Comment 56: Note that EV charging will be expected. The number and level of charging will be determined with conditions for the site. (Transportation Planning)

Response: *Acknowledged.*

Comment 57: Provide a trash pickup plan. (Transportation Planning)

Response: *A note has been added to P-0401 for trash collection.*

Comment 58: Clarify use of the loading space (e.g., trash, residential). (Transportation Planning)

Response: *The loading space is used for both trash pick-up and residential use.*

Comment 59: Expand sidewalk at the site frontage to at least 6’ per the [City of Alexandria Complete Streets Design Guidelines for Sidewalks](#) (Transportation Planning)

Response: *The sidewalk has been expanded to be 6’ wide, see P-0401.*

AlexRenew Comments:

Comment 60: Applicant to include the following note on the CDSP plans and the plans issued for construction:

- a. Contractor shall ensure all discharges are in accordance with City of Alexandria Code Title 5, Chapter 6, Article B.
- b. Dewatering and other construction related discharge limits to the sewer system are regulated by AlexRenew Pretreatment. Contractor is required to contact AlexRenew's Pretreatment Coordinator at 703-721-3500 x2020. (AlexRenew)

Response: The above notes have been added on P-0201.

Comment 61: Applicant shall coordinate with the City of Alexandria T&ES to ensure that the planned flow does not exceed the City of Alexandria's allotted capacity in AlexRenew's Water Resource Recovery Facility or in the Potomac Interceptor during wet and average flow conditions. (AlexRenew)

Response: Acknowledged.

Comment 62: Applicant shall show all existing and proposed sanitary sewer connections on the plans. (AlexRenew)

Response: All proposed sanitary sewer connection is now shown on P-0401. The existing sanitary lateral for the site could not be located in the field during the property survey. The contractor will locate the lateral at the time of construction and cap it at the main per City of Alexandria standards.

Comment 63: Applicant shall provide calculations for post-development sewer flows from the site per City of Alexandria Memo to Industry 06-14. If the planned flows exceed 10,000 GPD, Applicant shall submit a sanitary sewer outfall analysis. (AlexRenew)

Response: Sanitary sewer adequate outfall analysis will be provided with future DSUP application, see note on P-0201.



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D. ARCHAEOLOGY

Findings:

Comment 64: Based on historic maps, the property at 3908 Elbert Ave. remained vacant from the mid-nineteenth century until the 1940s when the current structures on the property were built. By 1900 the property in question was part of 6 acres owned by Mary E. Brand (or Brandt). Evidence suggests that Brandt did not live on the property but rented it out. Later maps indicate that a dwelling house (presumably built in the early twentieth century stood a mere 75 ft. to the west of the west boundary of the property. Given the proximity of a dwelling house, the subject property could contain evidence of late-nineteenth and early twentieth century Alexandria.

Response: Acknowledged.

Conditions:

Comment 65: The statements in archaeology conditions below shall appear in the General Notes of all site plans and on all site plan sheets that involve demolition or ground disturbance (including Basement/Foundation Plans, Demolition, Erosion and Sediment Control, Grading, Landscaping, Utilities, and Sheeting and Shoring) so that on-site contractors are aware of the requirements:

- a. The applicant/developer shall call Alexandria Archaeology immediately (703-746-4399) if any buried structural remains (wall foundations, wells, privies, cisterns, etc.) or concentrations of artifacts—particularly pieces of worked quartz, quartzite, or Indian pottery—are discovered during ground disturbing activities. Work must cease in the area of the discovery until a City archaeologist comes to the site and records the finds.
- b. The applicant/developer shall not allow any metal detection to be conducted on the property, unless authorized by Alexandria Archaeology.

Response: The above notes can be found on P-0101.

Archaeology Code:

Comment 66: All required archaeological preservation measures shall be completed in compliance with Section 11-411 of the Zoning Ordinance.

Response: Acknowledged.

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E. CODE ADMINISTRATION

Comments:

Comment 67: A building permit and plan review are required prior to the start of construction.
(Code)

Response: *Acknowledged.*

F. FIRE DEPARTMENT

Findings:

Comment 68: The following comments are for concept 1 Stage 1 Rev. 1 only. Additional comments may be forthcoming or current comments deleted once the Applicant provides supplemental information for review. Please direct any questions to Ray Overkott at 703-746-4256 or raymond.overkott@alexandriava.gov.

Note: Attached are the Fire Department Construction Requirements. Please review and share the document with the General Contractor for review and to reference throughout the project.

Response: *Acknowledged.*

Comment 69: All new fire hydrants on city streets shall be City owned and maintained. All hydrants on private streets shall be owned, inspected, tested, and maintained by the property owner or their representative.

Response: *A fire hydrant has been added to P-0401 and is located in the public right-of-way (City owned/maintained).*

Recommendations:

Comment 70: To improve fire department operational capabilities and where practicable, it is recommended that all stairways extend to the roof level for direct access to the roof.

Response: *Acknowledged.*

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Comment 71: In the event an existing building will be razed, contact the Alexandria Fire Department Training Division at 703-746-5265 or 703-746-5194 during the Final Site Plan review to discuss utilizing the structure(s) for training exercises prior to demolition. If such an agreement can be reached, conditions of use between the parties and a hold harmless agreement will be provided to the owner or their representative.

Response: *Acknowledged.*

Code:

Comment 72: The Applicant shall provide a separate Fire Service Plan which illustrates **where applicable:** a) emergency ingress/egress routes to the site; b) one fire department connection (FDC) for buildings under 5 stories or under 55 feet; two sufficiently remote FDC's for buildings 5 stories or more and over 55 feet; with one FDC located on the address side of the building; c) FDC's located within one hundred (100) feet of any existing or new fire hydrants d) new fire hydrants installed not less than forty (40) feet from building e) on site fire hydrants spaced with a maximum distance of three hundred (300) feet between hydrants and the most remote point of vehicular access on site; f) emergency vehicle easements (EVE) around the building with a minimum width of twenty-two (22) feet; g) the location and size of the separate fire line(s) for the building fire service connection and fire hydrants.

Response: *A new fire hydrant and two (2) remote FDCs are now provided on the plans. See P-0401 and P-1301.*

Comment 73: The Applicant shall provide a building code analysis with the following building code data on the plan: a) use group; b) number of stories; c) type of construction; d) floor area per floor; e) fire protection plan. This information will determine if item 7 requirements apply.

Response: *See P-1301 for building code analysis.*



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Comment 74: If building or structure is over 50 feet in height, it is required to have ladder truck access to 48% perimeter of the buildings by public roads or recorded emergency vehicle easements (EVE). For a building face to be considered accessible by a ladder truck the curb line shall be at least 15 feet and no more than 30 feet from the face of the building. Alternatives that demonstrate equivalency to this requirement will be considered on a case by case basis. Equivalency may be demonstrated through methods outlined in the City Fire Prevention Code Appendix D. All elevated structures designated as an EVE shall be designed to AASHTO HS-20 loading.

Response: *The applicant will provide enhanced building design features as allowed under City code in lieu of 48% ladder truck access. See P-1301 for compliance narrative.*

Comment 75: The Applicant shall provide two wet stamped copies of the fire flow analysis performed by a certified licensed fire protection engineer to assure adequate water supply for the structure being considered. The fire flow analysis shall be based on the ISO *Guide for Determination of Needed Fire Flow Edition 06-2014*. The two copies shall be submitted to Alexandria Fire Department, Fire Station 210 C/O Acting Supervisor Raymond Overkott 5255 Eisenhower Avenue Alexandria, Va. 22304.

Response: *Acknowledged. Needed fire flow calculation will be provided at the time of Final Site Plan.*

Comment 76: A Knox Box Rapid Entry key access system shall be installed to facilitate building entry by fire department personnel during an emergency. The size and number of Knox Boxes, number of key sets, and required keys or access devices shall be determined by Alexandria Fire Department personnel.

Response: *Acknowledged.*

Comment 77: An Applicant for construction of any building or structure, or addition to any building or structure, more than 10,000 square feet shall contact the City of Alexandria Radio System Manager in the Department of Emergency Communications prior to submission of a final site plan. The proposed project shall be reviewed with the Radio System Manager for compliance with City of Alexandria public safety radio communications requirements. The minimum requirements follow:

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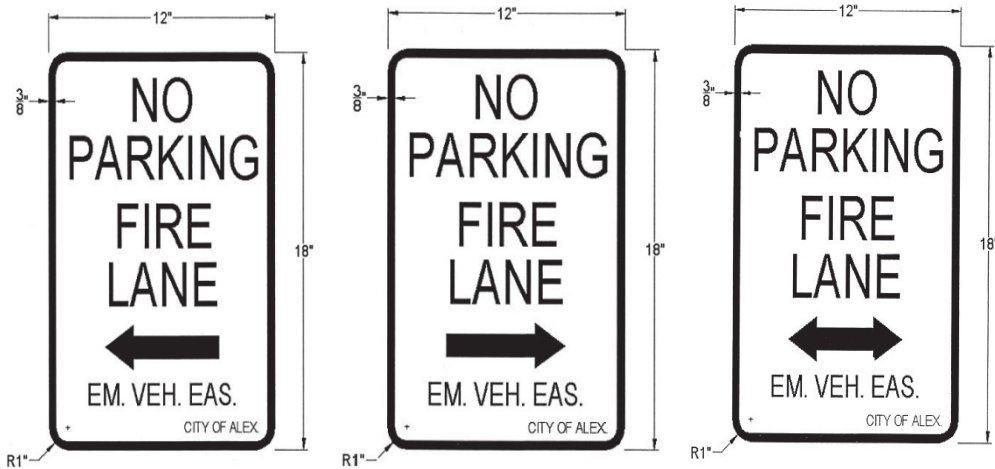
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- a. The design shall allow penetration of radio signals in the 806 to 815 MHz and 851 to 860 MHz frequency range.
- b. The design shall support minimum signal reception strength of -95 dBm, on signals transmitted from the radio system, when received within 90 percent or greater of each floor area.
- c. The design shall support minimum signal reception strength of -95 dBm on signals received by the radio system, when transmitted at a power level of 3 watts (35dBm) from within 90 percent or greater of each floor area.
- d. Areas deemed critical by the City of Alexandria, such as fire control rooms, exit stairways, and exit passageways shall provide 99 percent coverage or greater with minimum received strength of -95 dBm.
- e. If the building or structure fails to meet the above criterion the Applicant shall install, to the satisfaction of the Radio System Manager and in compliance with relevant building codes, a radio frequency amplification and distribution system designed to meet the above requirements. Amplifiers and any other powered equipment must consist of two power sources:
 - f. Primary Source: Dedicated branch circuit.
 - g. Secondary Source: Battery backup capable of powering the system for 12 hours at 100 percent capacity.
- h. The public safety radio communications system control panel shall provide a “signal booster failure” output that shall be connected and report a supervisory signal to the fire alarm system and annunciation panel if provided.
- i. Final testing and acceptance of amplification systems shall be reviewed and approved by the Radio System Manager.
- j. The building or structure shall be tested annually for compliance with City of Alexandria public safety radio communication requirements. Test results shall be submitted to the Radio System Manager. (Eric Parker, 703-746-1863 or radiomanager@alexandriava.gov)

Response: Acknowledged.

Comment 78: The fire service plan shall show placement of emergency vehicle easement signs. See sign detail and placement requirements are as follows:

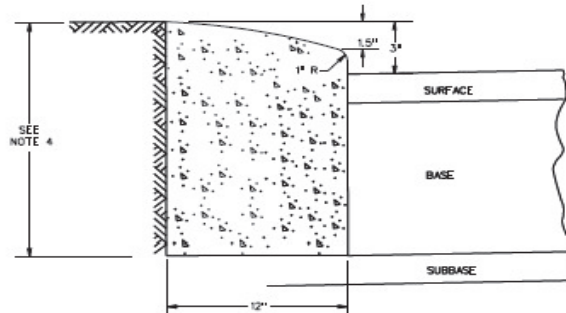
- a. Emergency vehicle easements shall be a minimum of 22 feet across the travel lane. The emergency vehicle easement shall provide access to strategic areas of the building and fire protection systems. Curbing and street components shall conform to the standards established by Transportation and Environmental Services and this document for emergency vehicle easements.
- b. Emergency vehicle easement signs shall be metal construction, 12-inches wide and 18 inches in height. Provide red letters on reflective white background with a 3/8-inch red trim strip around the entire outer edge of the sign. The lettering shall say "NO PARKING," "FIRE LANE," "EM. VEH. EAS," and "City of Alex.," Lettering size shall be as follows: "NO PARKING" - 2 inches, "FIRE LANE" - 2½ inches. EM. VEH. EAS. - 1 inch, CITY OF ALEX. - ½ inch. Directional Arrows - 1 inch by 6 inches solid shaft with solid head - 1½ inches wide and 2 inches deep (For examples, see Figures D102.1, D102.2, and D102.3). Signs shall be mounted with the bottom of the sign 7 feet above the roadway and shall be properly attached to a signpost or other approved structure such as designated by the fire official. Posts for signs, when required, shall be metal and securely mounted. Signs shall be parallel to the direction of vehicle travel and posted so the directional arrows clearly show the boundaries and limits of the Emergency Vehicle Easement. In areas where emergency vehicle easements involve two-way traffic, double mounted signs shall be provided. The maximum distance between signs shall be 100 feet. Other special signs or modifications to emergency vehicle easement signs shall be approved by the fire official.
- c. Where curbing is a component of the emergency vehicle easement, the curbing construction shall conform to weight and grade requirements for vehicular traffic. In no circumstances shall a raised curb be in the path of travel in an emergency vehicle easement. Where a mountable curb is provided as part of an emergency vehicle easement, emergency vehicle easement signs shall be posted at the point nearest the edge of the emergency vehicle easement, but in no case within the clear width of the emergency vehicle easement. Except for flush curbs, any fire department access points that require fire apparatus to mount a curb shall conform to the modified 3-inch curb design standard MOD CG-3 or MOD CG-7 design as shown.



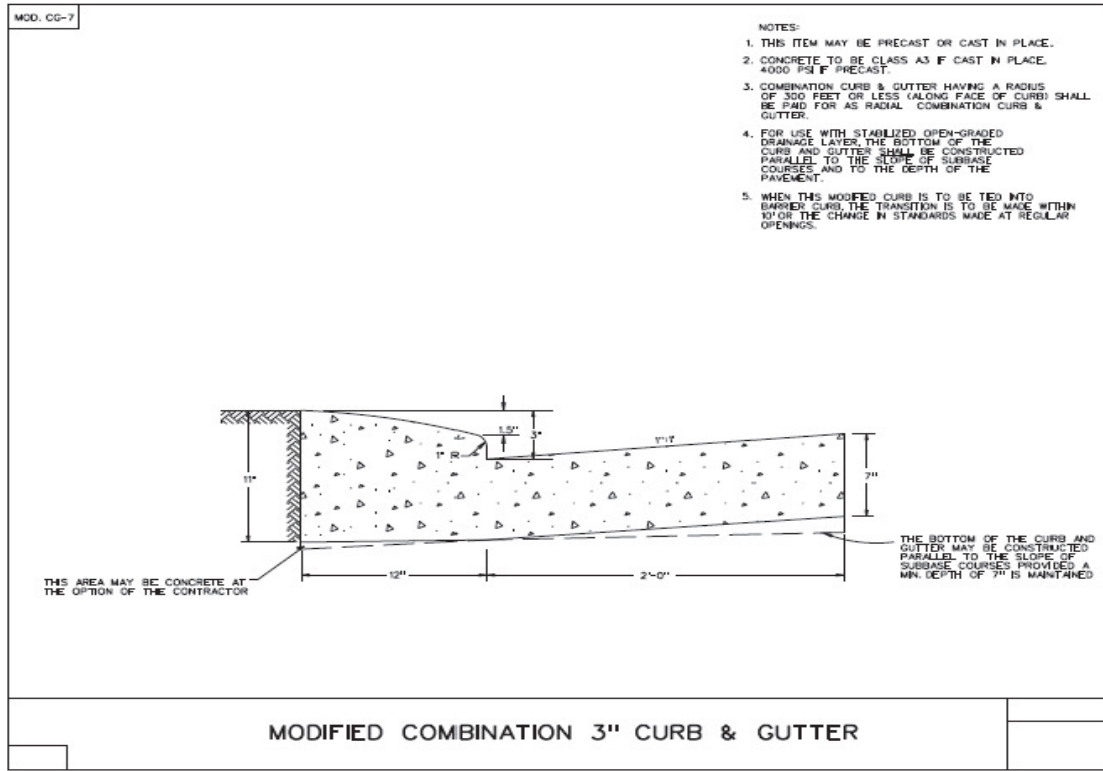
MOD. CC-3

NOTES:

1. THIS ITEM MAY BE PRECAST OR CAST IN PLACE.
2. CONCRETE TO BE CLASS A3 IF CAST IN PLACE, 4000 PSI IF PRECAST.
3. CURB HAVING A RADIUS OF 300 FEET OR LESS (ALONG FACE OF CURB) WILL BE PAID FOR AS RADIAL CURB.
4. THE DEPTH OF CURB MAY BE REDUCED AS MUCH AS 3" (10% DEPTH) OR INCREASED AS MUCH AS 3" (10% DEPTH) IN ORDER THAT THE BOTTOM OF CURB WILL COINCIDE WITH THE TOP OF A COURSE OF THE PAVEMENT SUBSTRUCTURE. OTHERWISE THE DEPTH IS TO BE 16" AS SHOWN. NO ADJUSTMENT IN THE PRICE BID IS TO BE MADE FOR A DECREASE OR AN INCREASE IN DEPTH.
5. WHEN THE MODIFIED CURB IS TO BE TIED INTO BARRIER CURB, THE TRANSITION IS TO BE MADE WITHIN 10' OR THE CHANGE IN STANDARDS MADE AT REGULAR OPENINGS.



MODIFIED 3" CURB



Response: *Acknowledged.*

Comment 79: Show fire apparatus vehicle turning radius based on the following specifications:

- Turning Radius – Wall to Wall = 44 feet 6 inches
- Curb to Curb = 36 feet 5 inches
- Inside turning radius = 20 feet 3 inches
- Overall Length – 46 feet 9.25 inches
- Overall Width – 101 inches
- Wheelbase from front axle to both rear axles – 257 inches
- Tandem axle spacing – 55" CL of axle to CL of axle
- Gross Weight – 80,000 pounds as built with no equipment or water gross weight

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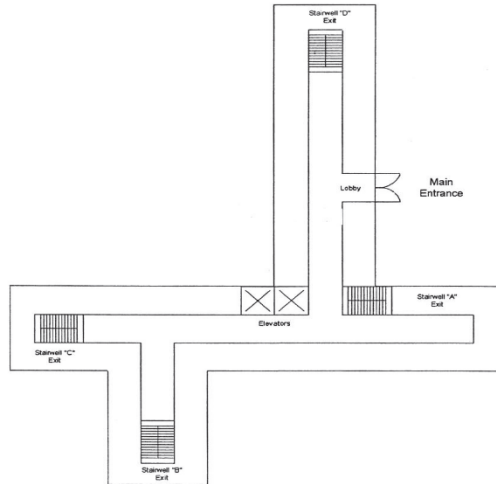
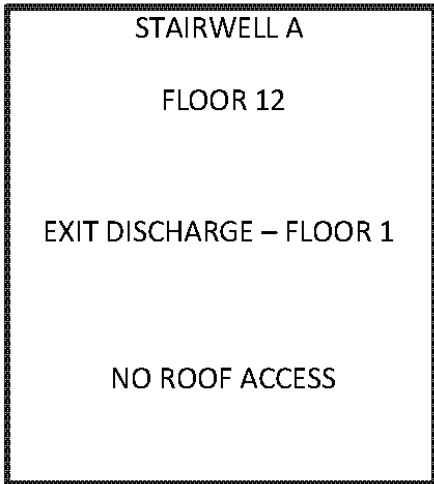
- i. Angle of Approach – 9 feet 7 inches
- j. Angle of Departure – 10 feet 8 inches
- k. Ramp Break Over – Break over angle is 4.42°

Response: *Acknowledged.*

Comment 80: Provide Stairway Identification. Stairway identification signs shall be provided at each landing in all interior exit stairways connecting more than three stories. Stairways shall be identified by letter designation starting next to the main entrance with "A" and continuing in a clockwise or left to right pattern using consecutive letters of the alphabet for each additional stairway. Two copies of the stairway signs shall be submitted to the fire official for approval before occupancy.

Stairway signs shall designate the stairway letter, state the floor level, the level of exit discharge, and if there is access or no access to the roof regardless if the access door or roof hatch locks. The bottom of the sign shall be located five (5) feet above the floor landing in a position that is readily visible when the stairwell door is opened or closed. The signs must have lettering that is a minimum of 2 inches but no greater than 4 inches in height. This information may be stenciled directly onto the wall, but all lettering must be of a color contrasting with the background stairway wall color.

In buildings greater than three stories where there is no graphic representation of the building footprint, a simplified building schematic must be display in the lobby. The simplified building footprint shall be an overhead view of the building exterior and the general layout of the lobby of the first floor. Stairways shall be denoted by letter as required.



Response: *Acknowledged.*

Comment 81: Existing fire hydrants shall remain in-service and unobstructed during construction.

Response: *Acknowledged.*

Comment 82: The proposed security gates shall be equipped with an override system that opens the gates in the event of a power failure, activation of a yelp siren, or with a Knox Box key. These features shall be designed and installed to the satisfaction of the Alexandria Fire Department Operations and Fire Prevention and Life Safety Sections.

Response: *Acknowledged.*

Comment 83: Applicant shall provide data on the incline (slope) of the driveway. This information shall be presented in percentage of slope for each change in elevation. Note: The maximum percentage for Trucks to be able to fully deploy the ladder is 8%. 3.5% provides 100 % tip capability. 3.5% - 8% provides 50% tip capability.

Response: *Acknowledged.*

Comment 84: The applicant shall insure any existing EVE remains open during construction.

Response: *Acknowledged.*

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Comment 85: A fire prevention code permit is or may be required for the proposed use and occupancy condition. Some permits may require an egress plan showing fixture location, aisles and exit doors or inventory and MSDS sheets for hazardous materials to be submitted for review with the permit application.

Response: *Acknowledged.*

Comment 86: All fire department connections shall be Knox® StorzGuard® with Locking Cap and 30-degree Elbow Knox® part number 5022.

Response: *Acknowledged.*

I hope we have clearly addressed all of the comments above. Please feel free to contact me with any questions at 703-532-6163 or tbrown@wlpinc.com.

Sincerely,



Travis P. Brown, P.E.
Senior Project Manager

(20-104)