



Docket Item #9

**Development Special Use Permit #2012-0007**  
**Enterprise RAC Company - 4700 Eisenhower Avenue**

Application	General Data	
<b>Project Name:</b> Enterprise Rent-a-Car	PC Hearing:	September 6, 2012
	CC Hearing:	September 15, 2012
	If approved, DSUP Expiration:	September 15, 2015 (36 months)
	Plan Acreage:	3.81 acres
<b>Location:</b> 4700 Eisenhower Avenue	Zone:	OCM(100) – Office Commercial Medium
	Proposed Use:	Motor Vehicle Storage and Light Automobile Repair
	Gross Floor Area:	94,384 square feet
<b>Applicant:</b> Enterprise RAC Company of Maryland LLC	Small Area Plan:	Landmark-Van Dorn

<b>Purpose of Application</b>
The applicant proposes to add 133 new parking spaces and renovate an existing warehouse for use as a motor vehicle storage and repair facility for Enterprise Rent-a-Car.
<b>Special Use Permits and Modifications Requested:</b>
<ol style="list-style-type: none"> <li>1. Special Use Permit for motor vehicle storage (more than 20 vehicles) within the OCM(100) zone</li> <li>2. Special Use Permit for light automobile repair within the OCM(100) zone.</li> </ol>

<b>Staff Recommendation: APPROVAL WITH CONDITIONS</b>
<b>Staff Reviewers:</b> Nathan Randall <a href="mailto:nathan.randall@alexandriava.gov">nathan.randall@alexandriava.gov</a> Patricia Escher <a href="mailto:patricia.escher@alexandriava.gov">patricia.escher@alexandriava.gov</a>

**PLANNING COMMISSION ACTION, SEPTEMBER 6, 2012:** On a motion by Ms. Lyman, seconded by Ms. Fossum, the Planning Commission recommended approval of the request, with amendments to Condition #16 to allow a four-foot high freestanding sign at the site and Condition #63 regarding deliveries, the deletion of Condition #73 regarding deliveries, and subject to compliance with all applicable codes, ordinances and staff recommendations. The motion passed on a vote of 5 to 0, with Mr. Dunn and Mr. Jennings absent.

Reason: The Planning Commission agreed with the staff analysis and with the applicant's request to allow a freestanding sign at the site.

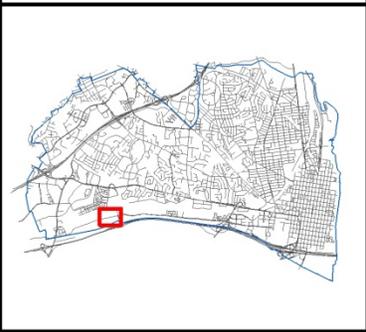
Speakers:

Don Buch, Cameron Station resident, expressed concern about traffic estimates for the proposed use.

Mary Catherine Gibbs, attorney for the applicant, spoke in support of the applicant's request and asked for the removal of Condition #16 to allow the applicant to have a freestanding sign at the site.



KEY MAP



**DSUP #2012-0007**

**9/6/2012**



## **I. SUMMARY**

### ***A. Recommendation***

Staff recommends **approval** of the Development Special Use Permit, with Site Plan, (DSUP #2012-0007) to allow for the construction of new surface parking spaces and the renovation of an existing warehouse for use as motor vehicle storage and light automobile repair facility for Enterprise Rent-a-Car. The request is consistent with other light industrial uses in the area and presents an opportunity to significantly improve the landscaping and streetscaping on the site, improving the property's overall appearance. Staff believes that the proposal, which is adaptive re-use of an existing building, is in alignment with "greener" stormwater treatment practices, and represents a good interim use of the property until such time that the neighborhood may redevelop in a more urban form.

### ***B. General Project Description***

The applicant, Enterprise RAC Company of Maryland LLC, requests Development Special Use Permit approval, with Site Plan, to add 133 surface parking spaces and renovate an existing warehouse building for use as a motor vehicle storage and light automobile repair facility for Enterprise Rent-a-Car. Approximately 6,300 square feet of office space will be added by reducing the existing first-floor ceiling height on the northwest corner of the building and adding a second floor within the confines of the existing building envelope. No changes will occur to either the building's footprint or height. The proposed site will be used as a satellite facility for the storage and minor repair of vehicles that are rented to customers at off-site "retail" Enterprise locations throughout Northern Virginia, but primarily, at Reagan National Airport.

With this Development Special Use Permit application, the applicant is seeking approval of the following requests:

1. Development Site Plan approval for the construction of 133 additional parking spaces;
2. Special Use Permit approval for the operation of motor vehicle storage facility with more than 20 vehicles; and
3. Special Use Permit approval for the operation of a light automobile repair facility.

## **II. BACKGROUND**

### ***A. Brief History***

Enterprise Rent-a-Car has operated a storage and repair facility at 1100-1200 North Fayette Street, which is a part of the Braddock Gateway site, since 2000. SUP#2000-0039 included an expiration date of May 2010 in order to facilitate any potential redevelopment of the site, however, the use was subsequently extended for another seven years pursuant to SUP#2010-0028. The City has recently approved both Phase I and II of the Braddock Gateway CDD, including the 2/3 acre park. The redevelopment of those parcels will eliminate overflow parking

spaces now used for the Enterprise facility and will eventually necessitate the closure of the existing Enterprise facility as well.

### ***B. Site Context***

The site of the proposed new Enterprise storage facility is located along the western portion of Eisenhower Avenue between the Van Dorn Metro and Clermont Avenue. The neighborhood is comprised of mostly industrial and office uses, including self-storage facilities and a FedEx distribution/warehouse facility. The built environment primarily consists of one and two-story industrial/office buildings constructed decades ago with large footprints and large surface parking lots. A few modern buildings are also located nearby, including the Victory Center office building (about a quarter-mile to the west) and the new Restaurant Depot located two properties to the east.

The property is mostly level but rises sharply in the back where it meets the CSX railroad tracks. The front one-third of the lot features an expanse of open green space which is unusual for this industrial area. The building on this site, which is primarily one story in height except for a small second-story storage loft, was constructed in 1972 and was occupied for many years by a wholesale pet food business. A 10,000-square foot addition was approved in 2000 for Restaurant Depot, a wholesale restaurant supply and equipment business that occupied the site between 2002 and early 2012. Restaurant Depot recently moved into a brand-new building at 4600 Eisenhower Avenue approved by City Council in 2009 under DSUP#2009-0003.

### ***C. Detailed Project Description***

The applicant requests approval to operate a motor vehicle storage and light automobile repair facility with a total of 391 parking spaces. As a practical matter, the use will occupy a total of approximately 53,000 square feet of space in the existing building footprint. Approximately 11,000 square feet of this space, with a total of 10 repair bays, will be used to make minor repairs to rental automobiles. Significant car washing and more substantive automobile repairs, such as engine, transmission or body work, will not occur at this site. Approximately 10,400 square feet of space will be dedicated for office uses, including 6,300 square feet of additional space created for offices in a new second floor on the northwest corner of the building. The addition of this new office area is possible without changing the building footprint or height given that there is approximately 38 feet of ceiling height within the existing building. About 1,400 square feet of storage space in an existing second-story loft will remain at the southeast corner of the building. The remaining 30,000 square feet of indoor space, which constitutes a majority of the building, will be used for the storage of rental vehicles that either cannot be accommodated at area Enterprise rental locations or are awaiting repair. The site will not be accessible to the general public and vehicles will not be rented to customers at this site. The proposed hours of operation will be between 5 a.m. and 12 midnight daily.

Of the 391 total parking spaces proposed for the site, 236 will be located in an expanded surface parking lot to the front and west side of the building, including three loading spaces, and 155 spaces will be located inside the building. Of the 236 outdoor surface parking spaces at the site, 133 of these are new spaces proposed to be located primarily in the existing open space area on

the northern one-third of the property. The additional parking results in an approximately 25,500 square-foot increase in the impervious surface area on the property.

The applicant proposes several changes to the exterior appearance of the site. Although the exterior of the building will remain largely the same as it appears today, windows will be added to both the first and the proposed second floor of the building and the existing portico roofline will be simplified. A new gate and guardhouse structure, approximately 80 square feet in size, will be added near the driveway entrance. Decorative metal fencing will be installed around the front and sides of the property and new light poles will be erected in the parking lot. Stormwater will be collected in a new bioretention area proposed near the front of the lot.

The most significant change to the proposal as a result of staff’s review has been the addition of landscaping to the site. The applicant originally proposed several landscaping improvements such as new street trees, additional landscaping around the perimeter of the site, and new trees in the proposed and existing parking islands. Staff has worked with the applicant to increase the amount of landscaping at the site to better screen the parking lot from the public right-of-way and to mitigate the loss of existing green space. The resulting plan includes a new berm and a significant increase in the number of trees and shrubs on the front portion of the property.

### III. ZONING

Property Address:	4700 Eisenhower Avenue	
Total Site Area:	165,955 square feet (3.81 acres)	
Zone:	OCM(100) / Office Commercial Medium	
Current Use:	Warehouse/Retail	
Proposed Use:	Motor Vehicle Storage and Light Automobile Repair	
	Permitted/Required	Proposed
FAR	1.5 (248,932 square feet)	0.57 (94,384 square feet)
Height	100 feet	38.5 feet
Front Setback	N/A	325.4 feet
Side Setbacks	N/A	84.4 feet (western) 1.2 feet (eastern)
Rear Setback	N/A	10.4 feet
Parking	61 spaces + 3 loading spaces = <b>64 total spaces</b>	233 spaces outside + 3 outside loading spaces + 155 inside spaces = <b>391 total spaces</b>

## **IV. STAFF ANALYSIS**

Staff recommends approval of the applicant's request to construct additional parking spaces and operate a motor vehicle storage and light automobile repair facility. The proposal represents the use of an existing building for the relocation and expansion of an existing Alexandria-based business that is appropriate for this primarily light industrial area. Although the applicant is adding impervious area to the site, it is also offering several improvements such as an improved stormwater quality retention system, additional landscaping/streetscape improvements and some modest enhancements to the building facade. These improvements will enhance the appearance and function of the site but will not preclude future options for redevelopment.

### ***A. Small Area Plan Conformance***

The site was rezoned along with several neighboring properties from I / Industrial to OCM(100) in 1992. The rezoning was consistent with the goals expressed in the Landmark-Van Dorn Small Area Plan which envisions higher-density office uses for this site. The plan recognized that the desired redevelopment of Eisenhower Valley may not occur for some time, a finding that was affirmed with the more recent 2009 Eisenhower West Industrial Land Use Study. More specifically, that study concluded that large-scale redevelopment is not likely to occur here in at least the next decade due to the current economic climate and the availability of nearby alternative redevelopment areas such as Carlyle and Potomac Yard. Approval of the applicant's request, particularly given that no new structures are proposed here, will not jeopardize the redevelopment goals expressed in the Small Area Plan.

### ***B. Economically Sustainable Development***

The proposal is consistent with the City Economic Sustainability goals because it represents the retention and expansion of a viable Alexandria business that supports the tourism industry and the local community. The relocated business will continue to employ area residents and contribute to the City's commercial tax base. It will also aid in the effort to rebalance real estate tax base to 50% commercial and 50% residential, relieving the City's reliance on the residential tax base for the majority of its tax revenues.

### ***C. Landscaping/Site Improvements***

The applicant will provide several new site improvements as a part of this proposal. Although the addition of new fencing and minor building façade changes such as new windows help to make the site more attractive, additional landscaping is a significant improvement. The current landscaping plan, which is the result of a collaborative effort between staff and the applicant and may be further refined during the final site plan process, includes the creation of a new berm which will help to screen the expanded parking lot from Eisenhower Avenue. Dozens of new trees and shrubs will be added in the front portion of the lot, particularly around the new berm / bioretention area as an innovative method for filtering stormwater. The parking lot area will include several new trees in new planting islands in conformance with the City's guidelines.

Landscaping will also be added along the eastern property line, and in select locations immediately around the building and to the rear of the lot.

The new plantings will enhance the overall appearance of the site and help to soften its industrial character. The additional greenery will occupy more vertical space and will be more evenly dispersed throughout the site as compared to today. The additional landscaping proposed for the front of the lot is also a positive accommodation for the loss of some of the existing open space for additional parking. With its increased screening benefit and attractive array of plantings, the new landscaped area is an improvement over the existing green area, which despite its larger size provides limited visual interest or functional benefit.

#### ***D. Pedestrian / Streetscape Improvements***

In addition to on-site improvements, the applicant proposes new amenities along the public right-of-way as well. A double row of street trees will be provided on site and within a new four-foot wide planting strip between the sidewalk and the curb. The new trees will fill a gap in street trees along this portion of Eisenhower Avenue and represent a step toward make Eisenhower more pedestrian-friendly. The applicant will also construct a new six-foot wide concrete sidewalk and a new ADA-compliant bus stop waiting area.

#### ***E. Stormwater Treatment***

This project presents an opportunity for improved stormwater treatment. The applicant is proposing to treat the stormwater generated from the increased impervious area of the expanded parking lot through a larger, relocated bioretention area at the front of the property. New plantings around the bioretention area will help filter stormwater, a method that aligns with the City's current efforts to find innovative ways to treat stormwater in a more "green" way. An additional Best Management Practice (BMP) for stormwater or a monetary contribution may be required, in addition to the applicant's current proposal, prior to release of the final site plan.

#### ***F. Traffic***

The proposal should affect a positive change in terms of overall traffic generation at this site. The applicant has provided trip generation estimates, based on Institute of Transportation Engineers (ITE) standards, showing that the number of daily trips will decrease nearly 40%, from 335 to 228 trips each day, in connection with the proposed use. The decrease of vehicular trips is also a reasonable deduction from a practical standpoint because the prior use, Restaurant Depot, was a wholesale establishment catering to local restaurateurs who made frequent trips to the site to replenish their supplies, whereas the proposed Enterprise location will not be a "retail" outlet where customers can pick-up rental vehicles.

## **V. COMMUNITY**

On June 13, 2012, the applicant hosted an open meeting to discuss the proposal with the community, including representatives from the Cameron Station Civic Association. The topics discussed during the meeting included:

- The interim nature of the project and that when market demands change that this use will probably be replaced;
- That this is an infill project that will allow a viable business within the City to remain operational;
- That there will be modest improvements to the overall appearance of the building and;
- The applicant will provide a new public sidewalk, street trees and additional landscaping on site.

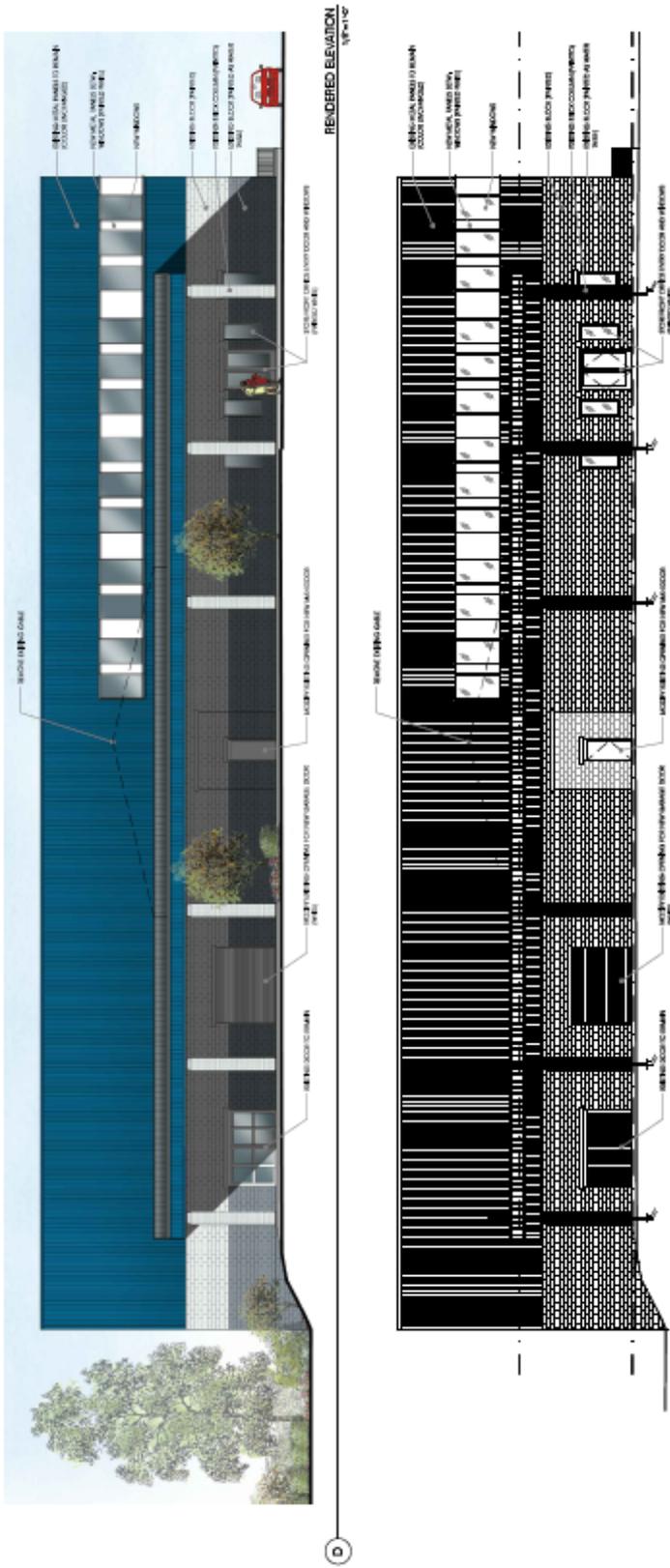
On June 19, 2012, the applicant briefed the West End Business Association (WEBA) regarding the proposal. Attendees at the meeting expressed support for the proposal.

## **VI. CONCLUSION**

Staff recommends **approval** subject to compliance with all applicable codes, ordinances, and the following staff recommendations.



Building Elevations



Existing Conditions



## **VIII. STAFF RECOMMENDATIONS**

### ***A. GENERAL***

1. The Final Site Plan shall be in substantial conformance with the preliminary plan stamped July 16, 2012 and comply with the following conditions of approval. (P&Z)
2. The applicant shall conduct employee training sessions on an ongoing basis, including as part of any employee orientation, to discuss all SUP provisions and requirements. (P&Z)

### ***B. PEDESTRIAN/STREETSCAPE***

3. Provide the following pedestrian improvements to the satisfaction of the Directors of P&Z and T&ES:
  - a. Complete all pedestrian improvements prior to the issuance of a certificate of occupancy permit.
  - b. Install ADA accessible pedestrian crossings serving the site.
  - c. Construct all concrete sidewalks to City standards. The minimum unobstructed width of newly constructed sidewalks shall be 6’
  - d. Sidewalks shall be flush across all driveway crossings, where applicable. All newly constructed curb ramps in Alexandria shall be concrete with detectable warning and shall conform to current VDOT standards. \*\*\* (P&Z)(T&ES)

### ***C. OPEN SPACE/LANDSCAPING***

4. Provide material, finishes, and architectural details for all retaining walls, seat walls, decorative walls, and screen walls. Indicate methods for grade transitions, handrails- if required by code, directional changes, above and below grade conditions. Coordinate with adjacent conditions. Design and construction of all walls shall be to the satisfaction of the Directors of P&Z, and T&ES. P&Z)(T&ES)
5. Staff will continue to work with the applicant regarding the berm and bioretention design. (P&Z)
6. Develop, provide, install and maintain an integrated Landscape Plan with the final site plan that is coordinated with other associated site conditions to the satisfaction of the Directors of P&Z. At a minimum the Landscape Plan shall:
  - a. Ensure positive drainage in all planted areas.
  - b. Provide planting details for all proposed conditions including street trees, multi-trunk trees, shrubs, perennials, and groundcovers.
  - c. Identify the extents of any areas of tree wells/trenches within the sidewalk on the landscape and site plans.

- d. Provide a plan exhibit that verifies the growing medium in street tree wells/trenches-meets the requirements of the City's *Landscape Guidelines* for soil volume. The plan shall identify all areas that are considered to qualify towards the soil requirements, with numerical values illustrating the volumes. (P&Z)
  - e. Provide an enlarged illustration of the landscaping area at the front of the site for better viewing/differentiation of proposed plantings. The proposed berm shall be depicted on the landscape plan in both the standard and enlarged illustration. (P&Z)
7. Provide a site irrigation and/or water management plan developed installed and maintained to the satisfaction of the Directors of RP&CA, P&Z and Code Administration.
- a. Provide an exhibit that demonstrates that all parts of the site can be accessed by a combination of building mounted hose bibs and ground set hose connections.
  - b. Provide external water hose bibs continuous at perimeter of building. Provide at least one accessible, external water hose bib on all building sides at a maximum spacing of 90 feet apart.
  - c. Hose bibs, ground set water connections and FDCs must be fully accessible and not blocked by plantings, site utilities or other obstructions.
  - d. Install all lines beneath paved surfaces as sleeved connections.
  - e. Locate water sources and hose bibs in coordination with City Staff. (Code Administration) (P&Z)
8. Prior to commencement of landscape installation/planting operations, a pre-installation/construction meeting will be scheduled with the project planner in the Department of Planning & Zoning to review the scope of installation procedures and processes. (P&Z)

#### ***D. TREE PROTECTION AND PRESERVATION***

9. Provide, implement and follow a tree conservation and protection program that is developed per the City of Alexandria Landscape Guidelines and to the satisfaction of the Directors of P&Z. (P&Z)
10. The area of the limits of disturbance and clearing for the site shall be limited to the areas as generally depicted on the preliminary site plan stamped July 16, 2012 and reduced if possible to retain existing trees and grades. (P&Z)

#### ***E. BUILDING***

11. FAR Calculations need to be revised consistent with Section 2-145(B) of the Zoning Ordinance. [Section 2-145(A), previously cited by the applicant, applies only to residential development.] (P&Z)

12. The applicant shall work with the City for recycling and/or reuse of the existing building materials as part of the demolition process, including leftover, unused, and/or discarded building materials. (T&ES)(P&Z)
13. In order to provide a more sustainable use of natural resources, the applicant shall use EPA-labeled WaterSense or equivalent low flow fixtures for any new/replacement fixtures. In addition, the applicant is encouraged to explore the possibilities of adopting water reduction strategies (i.e., use of gray water system on-site) and other measures that could reduce the consumption of potable water on this site. A list of applicable mechanisms can be found at <Http://www.epa.gov/WaterSense/pp/index.htm>. (T&ES)

#### ***F. SIGNAGE***

14. Design business and identification signs to relate in material, color and scale to the building and the tenant bay on which the sign is displayed to the satisfaction of the Director of P&Z.
  - a. The business and identification signs shall be designed of high quality materials and sign messages shall be limited to logos and names.
  - b. Installation of building mounted signage shall not damage the building and signage shall comply with all applicable codes and ordinances. (P&Z)
15. Internally illuminated box signs are prohibited. Explore the use of exterior illumination. (P&Z)
16. **CONDITION AMENDED BY PLANNING COMMISSION:** The existing freestanding monument signs shall be lowered to achieve an overall height not to exceed four feet prohibited at the site. (P&Z)(PC)
17. Install a temporary informational sign on the site prior to the approval of the final site plan for the project. The sign shall be displayed until construction is complete or replaced with a contractor or real estate sign incorporating the required information; the sign shall notify the public of the nature of the upcoming project and shall provide a phone number for public questions regarding the project.\* (P&Z)(T&ES)

#### ***G. PARKING***

18. The maximum number of vehicles that may be parked at the site at any one time, including inside, outside, and employee parking, shall be 388. (P&Z)
19. Provide 6 bicycle parking space(s) per Alexandria's current Bicycle Parking Standards. Bicycle parking standards, acceptable rack types for short- and long-term parking and details for allowable locations are available at: [www.alexandriava.gov/bicycleparking](http://www.alexandriava.gov/bicycleparking). (T&ES)

## ***H. BUS STOPS AND BUS SHELTERS***

20. Make bus stops adjacent to the site ADA compliant. ADA compliance includes:
  - a. Install an unobstructed seven (7) foot wide, parallel to the roadway, by eight (8) foot wide, perpendicular to the curb, bus stop passenger loading pad. The loading pad shall be at the same grade as the sidewalk, connect the curb to the sidewalk, and the pad's surface material shall match the sidewalk. The exiting width of the sidewalk may be counted towards the 8 foot wide perpendicular to the curb area. Passenger loading pads shall never be placed on storm drain inlets, catch basins, and other obstacles that would make the bus stop and bus stop loading pad inaccessible. See attached standard details. (T&ES)
21. Street trees in close proximity to bus stop approaches or directly adjacent to travel lanes shall be:
  - a. Located to avoid conflict with vehicles, specifically:
    - i. Trees shall be excluded from a 40 ft. zone which represents the length of the bus as it is serving the stop.
    - ii. Trees within both the 10 ft. departure zone and the 20 ft. approach zone (on either side of the 40 ft. zone) shall be selectively located to minimize conflict with vehicles and to allow direct line of sight for approaching buses.
  - b. Subject to the character of the adjacent area and relevant design guidelines for spacing, distance from the curb and species selection. In general, trees shall be of the same species along the entire block face.
  - c. selected from upright branching species in areas where relevant design guidelines do not otherwise specify
  - d. Installed with a minimum six feet of clear stem and gradually pruned to reduce conflict with vehicles, under consultation from a certified arborist. Pruning of street trees is part of the regular maintenance required of applicants under the City's bond for public improvements.
  - e. Set back from the curb edge where the width of sidewalk and adjacent conditions allow. (T&ES)

## ***I. SITE PLAN***

22. Pursuant to Section 11-418 of the Zoning Ordinance, the Development Special Use Permit shall expire and become null and void, unless substantial construction of the project is commenced within 36 months after initial approval and such construction is thereafter pursued with due diligence. The applicant shall provide a written status report to staff 18 months after initial approval to update the City Council on the project status. (P&Z)
23. Submit the plat with all applicable easements prior to the final site plan submission. The plat(s) shall be approved and recorded prior to the release of the final site plan.\* (P&Z)(T&ES)

24. Coordinate location of site utilities with other site conditions to the satisfaction of the Directors of P&Z and T&ES. These items include:
  - a. Location of site utilities including above grade service openings and required clearances for items such as transformers, telephone, HVAC units and cable boxes.
  - b. Minimize conflicts with plantings, pedestrian areas and major view sheds.
  - c. Do not locate above grade utilities in dedicated open space areas.
  - d. Above-ground utilities shall be screened from the public right-of-way. (P&Z)(T&ES)
  
25. Provide a lighting plan with the final site plan to verify that lighting meets City standards. The plan shall be to the satisfaction of the Directors of T&ES and P&Z, in consultation with the Chief of Police and shall include the following:
  - a. Clearly show location of all existing and proposed street lights and site lights, shading back less relevant information.
  - b. A lighting schedule that identifies each type and number of all fixtures, mounting height, and strength of fixture in Lumens or Watts.
  - c. Manufacturer's specifications and details for all proposed fixtures including site, landscape, pedestrian, sign(s) and security lighting.
  - d. A photometric plan with lighting calculations that include all existing and proposed light fixtures, including any existing street lights located on the opposite side(s) of all adjacent streets. Photometric calculations must extend from proposed building face(s) to property line and from property line to the opposite side(s) of all adjacent streets and/or 20 feet beyond the property line on all adjacent properties and rights-of-way. Show existing and proposed street lights and site lights.
  - e. Photometric site lighting plan shall be coordinated with architectural/building mounted lights, site lighting, street trees and street lights to minimize light spill into adjacent residential areas.
  - f. Provide location of conduit routing between site lighting fixtures so as to avoid conflicts with street trees.
  - g. Detail information indicating proposed light pole and footing in relationship to adjacent grade or pavement. All light pole foundations shall be concealed from view.
  - h. The lighting for the areas not covered by the City of Alexandria' standards shall be designed to the satisfaction of Directors of T&ES and P&Z.
  - i. Provide numeric summary for various areas (i.e., roadway, walkway/ sidewalk, alley, and parking lot, etc.) in the proposed development.
  - j. Light fixtures for open canopies shall be recessed into the ceiling for any areas that can be seen from the public ROW.
  - k. Upon installation of all exterior light fixtures for the site/building, the applicant shall provide photographs of the site demonstrating compliance with this condition.
  - l. Full cut-off lighting shall be used at the development site to prevent light spill onto adjacent properties.

- m. Lighting level at a minimum of 2.0 foot candles maintained for the parking lot.
  - n. Lighting level for the back parking lots at a minimum of 2.0 foot candles minimum maintained. The light shall be shielded as to not trespass onto other properties. (P&Z)(T&ES)(Police)
26. The Emergency Vehicle Easement (EVE) shall not be painted. When an EVE is shared with a pedestrian walkway or consists of grasscrete or a similar surface treatment, the EVE shall be defined in a manner that is compatible with the surrounding ground plane. (P&Z)

## ***J. CONSTRUCTION***

27. Submit a construction phasing plan to the satisfaction of the Director of T&ES, for review, approval and partial release of Erosion and Sediment Control for the final site plan. In addition, building and construction permits required for site preconstruction shall be permitted prior to release of the final site plan to the satisfaction of the Director of T&ES. \* (T&ES)
28. Submit a construction management plan for review and approval by the Directors of P&Z, T&ES and Code Administration prior to final site plan release. The plan shall:
- a. Include a plan for temporary pedestrian and vehicular circulation;
  - b. Include analysis as to whether temporary street lighting is needed on the site and how it is to be installed.
  - c. Include the overall schedule for construction and the hauling route;
  - d. Copies of the plan shall be posted in the construction trailer and given to each subcontractor before they commence work;
  - e. If the plan is found to be violated during the course of construction, citations will be issued for each infraction and a correction notice will be forwarded to the applicant. If the violation is not corrected within five (5) calendar days, a “stop work order” will be issued, with construction halted until the violation has been corrected. \* (P&Z)(T&ES)(Code)
29. Provide off-street parking for all construction workers without charge to the construction workers. For the construction workers who use Metro, DASH, or another form of mass transit to the site, the applicant shall subsidize a minimum of 50% of the fees for mass transit. Compliance with this condition shall be a component of the construction management plan, which shall be submitted to the Department of P&Z and T&ES prior to final site plan release. This plan shall:
- a. Establish the location of the parking to be provided at various stages of construction, how many spaces will be provided, how many construction workers will be assigned to the work site, and mechanisms which will be used to encourage the use of mass transit.
  - b. Provide for the location on the construction site at which information will be posted regarding Metro schedules and routes, bus schedules and routes.
  - c. If the plan is found to be violated during the course of construction, a correction notice will be issued to the developer. If the violation is not corrected within five

- (5) days, a "stop work order" will be issued, with construction halted until the violation has been corrected. \* (P&Z)(T&ES)
30. The sidewalks shall remain open during construction or pedestrian access shall be maintained to the satisfaction of the Director of T&ES throughout the construction of the project. (T&ES)
  31. No major construction staging shall be allowed within the public right-of-way on Eisenhower Avenue. The applicant shall meet with T&ES to discuss construction staging activities prior to release of any permits for ground disturbing activities. \*\* (T&ES)
  32. Transit stops adjacent to the site shall remain open if feasible for the duration of construction. If construction forces the closure of the stop adjacent to the site, a temporary ADA accessible transit stop shall be installed. The exact temporary location shall be coordinated with the T&ES Transit Services Division. (T&ES)
  33. A "Certified Land Disturber" (CLD) shall be named in a letter to the Division Chief of Construction Management & Inspection prior to any land disturbing activities. If the CLD changes during the project, that change must be noted in a letter to the Division Chief. A note to this effect shall be placed on the Phase I Erosion and Sediment Control sheets on the site plan. (T&ES)
  34. Prior to commencing clearing and grading of the site, the applicant shall hold a meeting with notice to all adjoining property owners and civic associations to review the location of construction worker parking, plan for temporary pedestrian and vehicular circulation, and hours and overall schedule for construction. The Departments of P&Z and T&ES shall be notified of the date of the meeting before the permit is issued. (P&Z)(T&ES)
  35. Identify a person who will serve as a liaison to the community throughout the duration of construction. The name and telephone number, including an emergency contact number, of this individual shall be provided in writing to residents, property managers and business owners whose property abuts the site and shall be placed on the project sign, to the satisfaction of the Directors of P&Z, and/or RP&CA and T&ES. (P&Z)(RP&CA)(T&ES)
  36. Submit an as-built development site plan survey, pursuant to the requirements outlined in the initial as-built submission for occupancy portion of the as-built development site plan survey checklist to the Department of Transportation and Environmental Services Site Plan prior to requesting a certificate of occupancy permit. The as-built development site plan survey shall be prepared and sealed by a registered architect, engineer, or surveyor. Include a note which states that the height was calculated based on all applicable provisions of the Zoning Ordinance. \*\*\* (P&Z)(T&ES)
  37. Implement a waste and refuse control program during the construction phase of this development. This program shall control wastes such as discarded building materials, concrete truck washout, chemicals, litter or trash, trash generated by construction workers

or mobile food vendor businesses serving them, and all sanitary waste at the construction site and prevent offsite migration that may cause adverse impacts to neighboring properties or to the environment to the satisfaction of Directors of T&ES and Code Administration. All wastes shall be properly disposed offsite in accordance with all applicable federal, state and local laws. (T&ES)

38. Contractors shall not cause or permit vehicles to idle for more than 10 minutes when parked. (T&ES)
39. If there are outstanding performance, completion or other bonds for the benefit of the City in effect for the property at such time as it may be conveyed or sold to a party other than the applicant, a substitute bond must be provided by that party or, in the alternative, an assignment or other documentation from the bonding company indicating that the existing bond remains in effect despite the change in ownership may be provided. The bond(s) shall be maintained until such time that all requirements are met and the bond(s) released by the City. (T&ES)

#### ***K. WASTEWATER / SANITARY SEWERS***

40. The applicant shall submit a letter to the Director of Transportation & Environmental Services prior to release of the final site plan acknowledging that this property will participate, if the City adopts a plan prior to release of the building permit, to require equal and proportionate participation in an improvements plan to mitigate wet weather surcharging in the Holmes Run Trunk Sewer sanitary sewer shed. (T&ES)
41. All newly installed interior drains shall be connected to the sanitary sewer. (T&ES)

#### ***L. SOLID WASTE***

42. Provide \$1,150 per receptacle to the Director of T&ES for purchase and installation of one (1) Iron Site Bethesda Series, Model SD-42 decorative black metal trash cans with domed lid by Victor Stanley. The receptacle(s) shall be placed in the public right of way to serve open space and park sites. Receptacles shall be generally located along the property frontage and at strategic locations in the vicinity of the site as approved by the Director of T&ES. Payment required prior to release of Final Site Plan.\* (T&ES)

#### ***M. STREETS / TRAFFIC***

43. If the City's existing public infrastructure is damaged during construction, or patch work required for utility installation then the applicant shall be responsible for construction/ installation or repair of the same as per the City of Alexandria standards and specifications and to the satisfaction of Director, Transportation and Environmental Services. (T&ES)

44. A pre-construction walk/survey of the site shall occur with Transportation and Environmental Services Construction Management & Inspection staff to document existing conditions prior to any land disturbing activities. (T&ES)
45. Submit a Traffic Control Plan as part of the final site plan, for construction detailing proposed controls to traffic movement, lane closures, construction entrances, haul routes, and storage and staging shall be provided for informational purposes. In addition, the Traffic Control Plan shall be amended as necessary and submitted to the Director of T&ES along with the Building and other Permit Applications as required. The Final Site Plan shall include a statement “FOR INFORMATION ONLY” on the Traffic Control Plan Sheets. (T&ES)
46. All Traffic Control Device design plans, Work Zone Traffic Control plans, and Traffic Studies shall be signed and sealed by a professional engineer, registered in the Commonwealth of Virginia. (T&ES)
47. Show turning movements of standard vehicles in the parking lot. Show turning movements of the largest delivery vehicle projected to use the loading dock. Turning movements shall meet AASHTO vehicular guidelines and shall be to the satisfaction of the Director of T&ES. (T&ES)
48. Furnish and install two 4" conduits with pull wires, and junction boxes located at a maximum interval of 300' underneath the sidewalk along the length of the site frontage on Eisenhower Avenue. These conduits shall terminate in an underground junction box at both the east and the west site frontage termini. The junction box cover shall have the word "TRAFFIC" engraved in it. (T&ES)

#### ***N. UTILITIES***

49. Locate all private utilities without a franchise agreement outside of the public right-of-way and public utility easements. (T&ES)

#### ***O. WATERSHED, WETLANDS, & RPAs***

50. The storm water collection system is located within the Cameron Run watershed. All on-site storm water curb inlets and public curb inlets within 50 feet of the property line shall be duly marked using standard City markers, or to the satisfaction of the Director of T&ES. (T&ES)
51. Project lies entirely within an area described on historical maps as containing marine clays. Construction methodology and erosion and sediment control measures must account for the presence of marine clay or highly erodible soils. (T&ES)

***P. BMP FACILITIES***

52. The City of Alexandria’s storm water management regulations regarding water quality are two-fold: first, phosphorus removal requirement and second, water quality volume default. Compliance with the phosphorus requirement does not relieve the applicant from the water quality default requirement. The water quality volume determined by the site’s proposed impervious area shall be treated in a Best Management Practice (BMP) facility. (T&ES)
53. Provide BMP narrative and complete pre and post development drainage maps that include areas outside that contribute surface runoff from beyond project boundaries to include adequate topographic information, locations of existing and proposed storm drainage systems affected by the development, all proposed BMPs and a completed Worksheet A or B and Worksheet C, as applicable. (T&ES)
54. The storm water Best Management Practices (BMPs) required for this project shall be constructed and installed under the direct supervision of the design professional or his designated representative. Prior to release of the performance bond, the design professional shall submit a written certification to the Director of T&ES that the BMPs are:
  - a. Constructed and installed as designed and in accordance with the approved Final Site Plan.
  - b. Clean and free of debris, soil, and litter by either having been installed or brought into service after the site was stabilized. \*\*\*\* (T&ES)
55. Surface-installed storm water Best Management Practice (BMP) measures, i.e. Bio-Retention Filters, Vegetated Swales, etc. that are employed for this site, require installation of descriptive signage to the satisfaction of the Director of T&ES. (T&ES)
56. Submit two originals of the storm water quality BMP Maintenance Agreement with the City to be reviewed as part of the Final #2 Plan. The agreement must be executed and recorded with the Land Records Division of Alexandria Circuit Court prior to approval of the final site plan.\* (T&ES)
57. The Applicant/Owner shall be responsible for installing and maintaining storm water Best Management Practices (BMPs). The Applicant/Owner shall execute a maintenance service contract with a qualified private contractor for a minimum of three years and develop an Owner’s Operation and Maintenance Manual for all Best Management Practices (BMPs) on the project. The manual shall include at a minimum: an explanation of the functions and operations of the BMP(s); drawings and diagrams of the BMP(s) and any supporting utilities; catalog cuts on maintenance requirements including mechanical or electrical equipment; manufacturer contact names and phone numbers; a copy of the executed maintenance service contract; and a copy of the maintenance agreement with the City. A copy of the contract shall also be placed in the BMP Operation and

Maintenance Manual. Prior to release of the performance bond, a copy of the maintenance contract shall be submitted to the City. \*\*\*\*\*(T&ES)

58. Submit a copy of the Operation and Maintenance Manual to the Office of Environmental Quality on digital media prior to release of the performance bond. \*\*\*\*\*(T&ES)
59. Prior to release of the performance bond, the Applicant is required to submit a certification by a qualified professional to the satisfaction of the Director of T&ES that any existing storm water management facilities adjacent to the project and associated conveyance systems were not adversely affected by construction operations. If maintenance of the facility or systems were required in order to make this certification, provide a description of the maintenance measures performed. \*\*\*\*\*(T&ES)

### ***Q. CONTAMINATED LAND***

60. Indicate whether or not there is any known soil and groundwater contamination present as required with all preliminary submissions. Should any unanticipated contamination, underground storage tanks, drums or containers be encountered at the site, the Applicant must immediately notify the City of Alexandria Department of Transportation and Environmental Services, Office of Environmental Quality. (T&ES)
61. The final site plan shall not be released, and no construction activity shall take place until the following has been submitted and approved by the Director of T&ES:
  - a. Submit a Site Characterization Report/Extent of Contamination Study detailing the location, applicable contaminants, and the estimated quantity of any contaminated soils and/or groundwater at or in the immediate vicinity of the site.
  - b. Submit a Risk Assessment indicating any risks associated with the contamination.
  - c. Submit a Remediation Plan detailing how any contaminated soils and/or groundwater will be dealt with, including plans to remediate utility corridors. Utility corridors in contaminated soil shall be over excavated by 2 feet and backfilled with “clean” soil.
  - d. Submit a Health and Safety Plan indicating measures to be taken during remediation and/or construction activities to minimize the potential risks to workers, the neighborhood, and the environment.
  - e. The applicant shall screen for PCBs as part of the site characterization to comply with the City's Department of Conservation and Recreation Municipal Separate Storm Sewer (MS4) permit.
  - f. Applicant shall submit three (3) electronic and two (2) hard copies of the above. The remediation plan must be included in the Final Site Plan. \* (T&ES)

### ***R. NOISE***

62. All exterior loudspeakers shall be prohibited and no amplified sound shall be audible at the property line. (T&ES)

63. **CONDITION AMENDED BY PLANNING COMMISSION:** Supply Deliveries, loading, and unloading activities shall not occur between the hours of 11:00pm and 7:00am. (T&ES)(PC)

***S. AIR POLLUTION***

64. No material may be disposed of by venting into the atmosphere. (T&ES)
65. No paint or coatings shall be applied at the site. (T&ES)
66. Control odors and any other air pollution sources resulting from operations at the site and prevent them from leaving the property or becoming a nuisance to neighboring properties, as determined by the Director of Transportation and Environmental Services. (T&ES)

***T. AUTOMOTIVE***

67. No car washing shall be allowed at the site. (P&Z)(T&ES)
68. All waste products including but not limited to organic compounds (solvents), motor oil, compressor lubricant and antifreeze shall be disposed of in accordance with all local, state and federal ordinances or regulations and not be discharged to the sanitary or storm sewers or be discharged onto the ground. (T&ES)
69. Comply with the City of Alexandria Best Management practices manual for automotive related industries. A copy can be obtained by contacting the Division of Environmental Quality at 703-838-4334. (T&ES)
70. No repair work shall be done outside on the subject property. All repairs of motor vehicles at the site shall be conducted inside a building or structure. (P&Z) (T&ES)
71. No junked, abandoned, or stripped vehicles shall be displayed, parked, or stored outside. (P&Z)
72. No vehicle parts, tires, or other materials shall be permitted to accumulate outside except in a dumpster or other suitable trash receptacle or enclosure. (P&Z)
73. **CONDITION DELETED BY PLANNING COMMISSION:** ~~Loading and unloading of vehicles, if any, shall take place on site and during hours of operation. (P&Z)~~

**CITY DEPARTMENT CODE COMMENTS**

Legend: C - Code Requirement R - Recommendation S - Suggestion F – Finding

**Planning and Zoning:**

- F-1 “Motor vehicle storage for more than 20 vehicles” shall be listed as an SUP request on page one of the plan submission next to the mention of the light automobile repair SUP request.
- F-2 The bus stop shall be depicted on the existing conditions plan.
- F-3 A notation should be made indicating whether the property is within 1,000 feet of a former landfill or other dump site.
- F-4 All utility lines shall be labeled with line size and owner.
- F-5 The applicant shall submit photographs showing all four sides of the existing building.
- F-6 The applicant shall revise the plan to state that no car washing will occur on-site, consistent with its statement in its July 13<sup>th</sup> letter to staff.
- C-1 As-built documents for all landscape and irrigation installations are required to be submitted with the Site as-built and request for Performance Bond release. Refer to City of Alexandria Landscape Guidelines, Section III A & B. \*\*\*\* (P&Z) (T&ES)
- C-2 The landscape elements of this development shall be subject to the Performance and Maintenance bonds, based on criteria established by the City and available through T&ES. Release of Performance and Maintenance Bonds are subject to inspections by City staff per City Code requirements. A final inspection for landscaping is also required three years after completion. \*\*\*\* (P&Z) (T&ES)

**Transportation and Environmental Services:**

- F-1 This application shows 0.58 acres of water quality volume left untreated. Applicant should consider at least one additional BMP. Contribution to the WQIF is \$50,530.00 for 0.58 acres of untreated impervious area. (T&ES- OEQ)
- F-2 The Final Site Plan must be prepared per the requirements of Memorandum to Industry 02-09 dated December 3, 2009, Design Guidelines for Site Plan Preparation, which is available at the City’s following web address:

<http://alexandriava.gov/uploadedFiles/tes/info/Memo%20to%20Industry%20No.%2002-09%20December%203,%202009.pdf>

- F-3 The plan shall show sanitary and storm sewer, and water line in plan and profile in the first final submission and cross reference the sheets on which the plan and profile is shown, if plan and profile is not shown on the same sheet. Clearly label the sanitary and storm sewer, or water line plans and profiles. Provide existing and proposed grade elevations along with the rim and invert elevations of all the existing and proposed sanitary and storm sewer at manholes, and water line piping at gate wells on the respective profiles. Use distinctive stationing for various sanitary and storm sewers (if applicable or required by the plan), and water line in plan and use the corresponding stationing in respective profiles. (T&ES)
- F-4 The Plan shall include a dimension plan with all proposed features fully dimensioned and the property line clearly shown. (T&ES)
- F-5 Include all symbols, abbreviations, and line types in the legend. (T&ES)
- F-6 All storm sewers shall be constructed to the City of Alexandria standards and specifications. Minimum diameter for storm sewers shall be 18” in the public Right of Way (ROW) and the minimum size storm sewer catch basin lead is 15”. The acceptable pipe materials will be AWWA C-151 (ANSI A21.51) Class 52 or Reinforced Concrete Pipe (RCP) ASTM C-76 Class IV. For roof drainage system, Polyvinyl Chloride (PVC) ASTM D-3034-77 SDR 26 and ASTM 1785-76 Schedule 40 pipes will be acceptable. The acceptable minimum and maximum velocities will be 2.0 fps and 15 fps, respectively. The storm sewers immediately upstream of the first manhole in the public Right of Way shall be owned and maintained privately (i.e., all storm drains not shown within an easement or in a public Right of Way shall be owned and maintained privately). (T&ES)
- F-7 All sanitary sewers shall be constructed to the City of Alexandria standards and specifications. Minimum diameter of sanitary sewers shall be 10” in the public Right of Way and sanitary lateral 6” for all commercial and institutional developments; however, a 4” sanitary lateral will be acceptable for single family residences. The acceptable pipe materials will be Polyvinyl Chloride (PVC) ASTM D-3034-77 SDR 26, ASTM 1785-76 Schedule 40, Ductile Iron Pipe (DIP) AWWA C-151 (ANSI A21.51) Class 52, or reinforced concrete pipe ASTM C-76 Class IV (For 12” or larger diameters); Class III may be acceptable on private properties. The acceptable minimum and maximum velocities will be 2.5 fps and 10 fps, respectively. Laterals shall be connected to the sanitary sewer through a manufactured “Y” or “T” or approved sewer saddle. Where the laterals are being connected to existing Terracotta pipes, replace the section of main and provide manufactured “Y” or “T”, or else install a manhole. (T&ES)
- F-8 Lateral Separation of Sewers and Water Mains: A horizontal separation of 10’ (edge to edge) shall be provided between a storm or sanitary sewer and a water line; however, if this horizontal separation cannot be achieved then the sewer and water main shall be installed in separate trenches and the bottom of the water main shall be at least 18” above

of the top of the sewer. If both the horizontal and vertical separations cannot be achieved then the sewer pipe material shall be Ductile Iron Pipe (DIP) AWWA C-151 (ANSI A21.51) Class 52 and pressure tested in place without leakage prior to installation. (T&ES)

- F-9 Crossing Water Main Over and Under a Sanitary or Storm Sewer: When a water main over crosses or under crosses a sanitary / storm sewer then the vertical separation between the bottom of one (i.e., sanitary / storm sewer or water main) to the top of the other (water main or sanitary / storm sewer) shall be at least 18” for sanitary sewer and 12” for storm sewer; however, if this cannot be achieved then both the water main and the sanitary / storm sewer shall be constructed of Ductile Iron Pipe (DIP) AWWA C-151 (ANSI A21.51) Class 52 with joints that are equivalent to water main standards for a distance of 10 feet on each side of the point of crossing. A section of water main pipe shall be centered at the point of crossing and the pipes shall be pressure tested in place without leakage prior to installation. Sewers crossing over the water main shall have adequate structural support (concrete pier support and/or concrete encasement) to prevent damage to the water main. Sanitary sewers under creeks and storm sewer pipe crossings with less than 6” clearance shall be encased in concrete. (T&ES)
- F-10 No water main pipe shall pass through or come in contact with any part of sanitary / storm sewer manhole. Manholes shall be placed at least 10 feet horizontally from the water main whenever possible. When local conditions prohibit this horizontal separation, the manhole shall be of watertight construction and tested in place. (T&ES)
- F-11 Crossing Existing or Proposed Utilities: Underground telephone, cable T.V., gas, and electrical duct banks shall be crossed maintaining a minimum of 12” of separation or clearance with water main, sanitary, or storm sewers. If this separation cannot be achieved then the sewer pipe material shall be Ductile Iron Pipe (DIP) AWWA C-151 (ANSI A21.51) Class 52 for a distance of 10 feet on each side of the point of crossing and pressure tested in place without leakage prior to installation. Sanitary / storm sewers and water main crossing over the utilities shall have adequate structural support (pier support and/or concrete encasement) to prevent damage to the utilities. (T&ES)
- F-12 The rip rap shall be designed as per the requirements of Virginia Erosion and Sediment Control Handbook, Latest Edition. (T&ES)
- F-13 Show the drainage divide areas on the grading plan or on a sheet showing reasonable information on topography along with the structures where each sub-area drains. (T&ES)
- F-14 Provide proposed elevations (contours and spot shots) in sufficient details on grading plan to clearly show the drainage patterns. (T&ES)
- F-15 All the existing and proposed public and private utilities and easements shall be shown on the plan and a descriptive narration of various utilities shall be provided. (T&ES)

- F-16 The Traffic Control Plan shall replicate the existing vehicular and pedestrian routes as nearly as practical and the pedestrian pathway shall not be severed or moved for non-construction activities such as parking for vehicles or the storage of materials or equipment. Proposed traffic control plans shall provide continual, safe and accessible pedestrian pathways for the duration of the project. (T&ES)
- C-1 Per the requirements of the City of Alexandria Zoning Ordinance Article XI, the applicant shall complete a drainage study and adequate outfall analysis for the total drainage area to the receiving sewer that serves the site. If the existing storm system is determined to be inadequate then the applicant shall design and build on-site or off-site improvements to discharge to an adequate outfall; even if the post development storm water flow from the site is reduced from the pre-development flow. The Plan shall demonstrate to the satisfaction of the Director of T&ES that a non-erosive stormwater outfall is present. (T&ES)
- C-2 Per the requirements of the City of Alexandria Zoning Ordinance (AZO) Article XIII, the applicant shall comply with the peak flow requirements and prepare a Stormwater Management Plan so that from the site, the post-development peak runoff rate from a two-year storm and a ten-year storm, considered individually, shall not exceed their respective predevelopment rates. If combined uncontrolled and controlled stormwater outfall is proposed, the peak flow requirements of the Zoning Ordinance shall be met. If the project site lies within the Braddock-West watershed then the applicant shall provide an additional 10% storage of the pre-development flows in this watershed to meet detention requirements. (T&ES)
- C-3 Per the requirements of Article 13-113 (d) of the AZO, all stormwater designs that require analysis of pressure hydraulic systems, including but not limited to the design of flow control structures and storm water flow conveyance systems shall be signed and sealed by a professional engineer, registered in the Commonwealth of Virginia. The design of storm sewer shall include the adequate outfall, inlet, and hydraulic grade line (HGL) analyses that shall be completed to the satisfaction of the Director of T&ES. Provide appropriate reference and/or source used to complete these analyses. (T&ES)
- C-4 Location of customer utility services and installation of transmission, distribution and main lines in the public rights of way by any public service company shall be governed by franchise agreement with the City in accordance with Title 5, Chapter 3, Section 5-3-2 and Section 5-3-3, respectively. The transformers, switch gears, and boxes shall be located outside of the public right of way. (T&ES)
- C-5 (a) Per the requirements of Section 5-3-2, Article A, Chapter 3 of the City of Alexandria Code, all new customer utility services, extensions of existing customer utility services and existing overhead customer utility services supplied by any existing overhead facilities which are relocated underground shall, after October 15, 1971 be installed below the surface of the ground except otherwise exempted by the City Code and to the satisfaction of the Director, Department of Transportation and Environmental Services.

(b) Per the requirements of Section 5-3-3, Article A, Chapter 3 of the City of Alexandria Code, all new installation or relocation of poles, towers, wires, lines, cables, conduits, pipes, mains, and appurtenances used or intended to be used to transmit or distribute any service such as electric current, telephone, telegraph, cable television, traffic control, fire alarm, police communication, gas, water, steam or petroleum, whether or not on the streets, alleys, or other public places of the City shall, after October 15, 1971, be installed below the surface of the ground or below the surface in the case of bridges and elevated highways except otherwise exempted by the City Code and to the satisfaction of Director, Department of Transportation and Environmental Services. (T&ES)

C-6 Flow from downspouts, foundation drains, and sump pumps shall be discharged to the storm sewer per the requirements of Memorandum to the industry on Downspouts, Foundation Drains, and Sump Pumps, Dated June 18, 2004 that is available on the City of Alexandria's web site. The downspouts and sump pump discharges shall be piped to the storm sewer outfall, where applicable after treating for water quality as per the requirements of Article XIII of Alexandria Zoning Ordinance (AZO). (T&ES)

C-7 In compliance with the City of Alexandria Zoning Ordinance Article XI, the applicant shall complete a sanitary sewer adequate outfall analysis as per the requirements of Memorandum to Industry No. 02-07 New Sanitary Sewer Connection and Adequate Outfall Analysis dated June 1, 2007. The memorandum is available at the following web address of the City of Alexandria (T&ES)

[http://alexandriava.gov/uploadedFiles/tes/info/New%20Sanitary%20Sewer%20Connection%20and%20Adequate%20Outfall%20Analysis%20\(02-07\).pdf](http://alexandriava.gov/uploadedFiles/tes/info/New%20Sanitary%20Sewer%20Connection%20and%20Adequate%20Outfall%20Analysis%20(02-07).pdf)

C-8 Per the requirements of Title 4, Chapter 2, Article B, Section 4-2-21, Appendix A, Section A 106(6), Figure A 106.1 Minimum Standards for Emergency Vehicle Access: provide a total turning radius of 25 feet to the satisfaction of Directors of T&ES and Office of Building and Fire Code Administration and show turning movements of standard vehicles in the parking lot as per the latest AASHTO vehicular guidelines. (T&ES)

C-9 The applicant shall provide storage space for solid waste and recyclable materials containers as outlined in the City's "Solid Waste and Recyclable Materials Storage Space Guidelines", or to the satisfaction of the Director of Transportation & Environmental Services. The City's storage space guidelines and required Recycling Implementation Plan forms are available at: [www.alexandriava.gov](http://www.alexandriava.gov) or contact the City's Solid Waste Division at 703-746-4410, or via email at [commercialrecycling@alexandriava.gov](mailto:commercialrecycling@alexandriava.gov), for information about completing this form. (T&ES)

C-10 The applicant shall be responsible to deliver the solid waste, as defined by the City Charter and Code of the City of Alexandria, to the Covanta Energy Waste Facility located at 5301 Eisenhower Avenue. A note to that effect shall be included on the plan. The developer further agrees to stipulate in any future lease or property sales agreement that all tenants and/or property owners shall also comply with this requirement. (T&ES)

- C-11 The applicants will be required to submit a Recycling Implementation Plan form to the Solid Waste Division, as outlined in Article H to Title 5 (Ordinance Number 4438), which requires all commercial properties to recycle. (T&ES)
- C-12 Bond for the public improvements must be posted prior to release of the site plan.\* (T&ES)
- C-13 All easements and/or dedications must be recorded prior to release of the site plan.\* (T&ES)
- C-14 Provide a phased erosion and sediment control plan consistent with grading and construction plan. (T&ES)
- C-15 Per the Memorandum to Industry, dated July 20, 2005, the applicant is advised regarding a requirement that applicants provide as-built sewer data as part of the final as-built process. Upon consultation with engineering firms, it has been determined that initial site survey work and plans will need to be prepared using Virginia State Plane (North Zone) coordinates based on NAD 83 and NAVD 88. Control points/Benchmarks which were used to establish these coordinates should be referenced on the plans. To insure that this requirement is achieved, the applicant is requested to prepare plans in this format including initial site survey work if necessary. (T&ES)
- C-16 The thickness of sub-base, base, and wearing course shall be designed using “California Method” as set forth on page 3-76 of the second edition of a book entitled, “Data Book for Civil Engineers, Volume One, Design” written by Elwyn E. Seelye. Values of California Bearing Ratios used in the design shall be determined by field and/or laboratory tests. An alternate pavement section for Emergency Vehicle Easements (EVE) to support H-20 loading designed using California Bearing Ratio (CBR) determined through geotechnical investigation and using Virginia Department of Transportation (VDOT) method (Vaswani Method) and standard material specifications designed to the satisfaction of the Director of Transportation and Environmental Services (T&ES) will be acceptable. (T&ES)
- C-17 All pedestrian, traffic, and way finding signage shall be provided in accordance with the Manual of Uniform Traffic Control Devices (MUTCD), latest edition to the satisfaction of the Director of T&ES. (T&ES)
- C-18 All driveway entrances, curbing, etc. in the public ROW or abutting public ROW shall meet City design standards. (T&ES)
- C-19 All sanitary laterals and/or sewers not shown in the easements shall be owned and maintained privately. (T&ES)
- C-20 The applicant shall comply with the City of Alexandria’s Noise Control Code, Title 11, Chapter 5, which sets the maximum permissible noise level as measured at the property line. (T&ES)

- C-21 The applicant shall comply with the Article XIII of the City of Alexandria Zoning Ordinance, which includes requirements for stormwater pollutant load reduction, treatment of the water quality volume default and stormwater quantity management. (T&ES)
- C-22 The applicant shall comply with the City of Alexandria, Erosion and Sediment Control Code, Section 5, Chapter 4. (T&ES)
- C-23 All required permits from Virginia Department of Environmental Quality, Environmental Protection Agency, Army Corps of Engineers, Virginia Marine Resources shall be in place for all project construction and mitigation work prior to release of the final site plan. This includes the state requirement for a VSMP permit for land disturbing activities greater than 2500 SF. \* (T&ES)

**Virginia American Water Company (VAWC):**

- F-1 Please keep enough clearance (5' typical) between the existing 8" water line and the proposed light pole and trees.
- F-2 Show water facilities (e.g. hydrant, water line, valve) on Landscape Plan.

**Alexandria Renew Enterprises (AlexRenew):**

- F-1 Sheet 1 (General Note 1) indicates that there is the potential for having a vehicle wash, while the Applicant's responses (7/13/12) to Comments 18 and 19 indicate that there will not be a vehicle wash on site. Revise plan to demonstrate that no vehicle washing will occur on site.

**Code Administration (Building Code):**

- F-1 No further comments regarding this application

**Fire:**

- F-1 No further comments regarding this application

**Police:**

- R-1 It is recommended that the buildings have an address number which is contrasting in color to the background, at least 3 inches high, reflective, and visible from the street. It is strongly suggested that no brass or gold colored numbers are used. This aids in a timely response from emergency personnel should they be needed.
- R-2 It is recommended that all of the ground floor level windows be equipped with a device or hardware that allows windows to be secured in a partially open position. This is to negate a "breaking and entering" when the windows are open for air.

**Archaeology**

F-1 There is low potential for significant archaeological resources to be disturbed by this project.

Asterisks denote the following:

- \* Condition must be fulfilled prior to release of the final site plan
- \*\* Condition must be fulfilled prior to release of the building permit
- \*\*\* Condition must be fulfilled prior to release of the certificate of occupancy
- \*\*\*\* Condition must be fulfilled prior to release of the bond

REVISED



**APPLICATION**

**DEVELOPMENT SPECIAL USE PERMIT with SITE PLAN**

**DSP #** 2012-0007

**Project Name:** Enterprise Holdings

**PROPERTY LOCATION:** 4700 Eisenhower Ave.

**TAX MAP REFERENCE:** 069.03-01-12

**ZONE:** OCM(100)

**APPLICANT:**

Name: Enterprise RAC Company of Maryland, LLC

Address: 2273 Research Blvd., 6th Floor, Rockville, MD 20850

**PROPERTY OWNER:**

Name: JMDH REAL ESTATE OF ALEXANDRIA LLC

Address: 1524 132ND ST., COLLEGE POINT NY 11356-2440

**SUMMARY OF PROPOSAL** Application to relocate an existing automobile storage and maintenance facility to this location.

**MODIFICATIONS REQUESTED** NA

**SUPs REQUESTED** SUP for automobile storage of 20 or more vehicles and a site plan to increase the number of parking spaces on site by more than 5 spaces. SUP for light automotive repair

**THE UNDERSIGNED** hereby applies for Development Site Plan with Special Use Permit approval in accordance with the provisions of Section 11-400 of the Zoning Ordinance of the City of Alexandria, Virginia.

**THE UNDERSIGNED**, having obtained permission from the property owner, hereby grants permission to the City of Alexandria to post placard notice on the property for which this application is requested, pursuant to Article XI, Section 11-301 (B) of the 1992 Zoning Ordinance of the City of Alexandria, Virginia.

**THE UNDERSIGNED** also attests that all of the information herein provided and specifically including all surveys, drawings, etc., required of the applicant are true, correct and accurate to the best of his/her knowledge and belief.

Mary Catherine Gibbs

Print Name of Applicant or Agent

307 N. Washington St.

Mailing/Street Address

Alexandria, VA

City and State

22314

Zip Code

Mary Catherine Gibbs  
Signature

703-836-5757

Telephone #

703-548-5443

Fax #

mcg.hcgk@verizon.net

Email address

June 19, 2012

Date

DO NOT WRITE IN THIS SPACE - OFFICE USE ONLY

Application Received: \_\_\_\_\_

Received Plans for Completeness: \_\_\_\_\_

Fee Paid and Date: \_\_\_\_\_

Received Plans for Preliminary: \_\_\_\_\_

ACTION - PLANNING COMMISSION: \_\_\_\_\_

ACTION - CITY COUNCIL: \_\_\_\_\_

**ALL APPLICANTS MUST COMPLETE THIS FORM.**

Supplemental forms are required for child care facilities, restaurants, automobile oriented uses and freestanding signs requiring special use permit approval.

**1. The applicant is: (check one)**

- the Owner
- Contract Purchaser
- Lessee or
- Other: \_\_\_\_\_ of the subject property.

State the name, address and percent of ownership of any person or entity owning an interest in the applicant, unless the entity is a corporation or partnership in which case identify each owner of more than ten percent.

Enterprise Holdings, Inc. - 600 Corporate Park Drive, Saint Louis, Missouri 63105 - sole member

If property owner or applicant is being represented by an authorized agent, such as an attorney, realtor, or other person for which there is some form of compensation, does this agent or the business in which the agent is employed have a business license to operate in the City of Alexandria, Virginia?

- Yes.** Provide proof of current City business license.
- No.** The agent shall obtain a business license prior to filing application, if required by the City Code.

## OWNERSHIP AND DISCLOSURE STATEMENT

Use additional sheets if necessary

**1. Applicant.** State the name, address and percent of ownership of any person or entity owning an interest in the applicant, unless the entity is a corporation or partnership, in which case identify each owner of more than ten percent. The term ownership interest shall include any legal or equitable interest held at the time of the application in the real property which is the subject of the application.

	Name	Address	Percent of Ownership
1.	Enterprise Holdings, Inc.	600 Corporate Park Drive	Sole Member of Applicant
2.		Saint Louis, Missouri 63105	
3.			

**2. Property.** State the name, address and percent of ownership of any person or entity owning an interest in the property located at 4700 Eisenhower Ave. (address), unless the entity is a corporation or partnership, in which case identify each owner of more than ten percent. The term ownership interest shall include any legal or equitable interest held at the time of the application in the real property which is the subject of the application.

	Name	Address	Percent of Ownership
1.	JMDH Real Estate of Alex	same as above	Owner Entity
2.	JRD Real Estate, LLC	same as JMDH Real Estate	100%
3.			

**3. Business or Financial Relationships.** Each person or entity indicated above in sections 1 and 2, with an ownership interest in the applicant or in the subject property are require to disclose any business or financial relationship, as defined by Section 11-350 of the Zoning Ordinance, existing at the time of this application, or within the 12-month period prior to the submission of this application with any member of the Alexandria City Council, Planning Commission, Board of Zoning Appeals or either Boards of Architectural Review. **All fields must be filled out completely. Do not leave blank. (If there are no relationships please indicated each person or entity below and "None" in the corresponding fields)**

Name of person or entity	Relationship as defined by Section 11-350 of the Zoning Ordinance	Member of the Approving Body (i.e. City Council, Planning Commission, etc.)
1. Enterprise RAC Co. of Mar	None	None
2. JMDH Real Estate of Alex	None	None
3. JRD Real Estate, LLC	None	None

**4. Enterprise Holdings, Inc. None**

**NOTE: Business or financial relationships of the type described in Sec. 11-350 that arise after the filing of this application and before each public hearing must be disclosed prior to the public hearings.**

As the applicant or the applicant's authorized agent, I hereby attest to the best of my ability that the information provided above is true and correct.

June 19, 201

Date

Mary Catherine Gibbs

Printed Name

*Mary Catherine Gibbs*  
Signature

2. **Narrative description.** The applicant shall describe below the nature of the request *in detail* so that the Planning Commission and City Council can understand the nature of the operation and the use, including such items as the nature of the activity, the number and type of patrons, the number of employees, the hours, how parking is to be provided for employees and patrons, and whether the use will generate any noise. If not appropriate to the request, delete pages 6-9. (*Attach additional sheets if necessary.*)

The applicant, Enterprise RAC Company of Maryland, LLC, ("Enterprise") is seeking to relocate its existing operation from near the Braddock Road metro station, on the Braddock Gateway property, to this location at 4700 Eisenhower Ave. Enterprise would like to utilize the existing Restaurant Depot structure/ lot for light automobile maintenance and storage/staging of its vehicles that service its retail locations for Enterprise, National and Alamo at National Airport and nearby.

The applicant is seeking to add parking spaces to the existing surface lot to maximize the number of parking spaces for storage of vehicles on the site, both inside and outside the building. Please see the proposed site plan for more details on the layout of the parking as well as the interior of the building. The applicant is also proposing to add office space to the interior of the building, which will only slightly alter the exterior of the building by adding windows on the second story. See the architectural elevations also attached.

Enterprise currently had approximately 30 employees at its existing location and will be increasing that number to 50 employees at this location. Current hours of operation are 5 a.m. to midnight, with the bulk of the employees working between 7 a.m. and 7 p.m.

**3. How many patrons, clients, pupils and other such users do you expect?**

Specify time period (i.e., day, hour, or shift).  
None, this is not a retail location.

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**4. How many employees, staff and other personnel do you expect?**

Specify time period (i.e. day, hour, or shift).  
50 employees total. The bulk of employees work between 7 a.m. and 7 p.m., with a limited number of employees (4-6) on site between 6-7 a.m. and 7 pm - midnight.

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**5. Describe the proposed hours and days of operation of the proposed use:**

Day	Hours	Day	Hours
Everyday	6 a.m.-Midnight		

**6. Describe any potential noise emanating from the proposed use:**

A. Describe the noise levels anticipated from all mechanical equipment and patrons.  
Vehicle unloading from delivery trucks, which will be in the rear of the site, and vehicles driving in and out of the site.

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B. How will the noise from patrons be controlled?  
All maintenance will be done inside the building and unloading of vehicles will

occur towards the rear of the site.

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**7. Describe any potential odors emanating from the proposed use and plans to control them:**

NA

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**8. Provide information regarding trash and litter generated by the use:**

- A. What type of trash and garbage will be generated by the use?  
Typical type from vehicle maintenance, and small office use.  
\_\_\_\_\_
- B. How much trash and garbage will be generated by the use?  
~~About one dumpster per week.~~ \_\_\_\_\_
- C. How often will trash be collected?  
~~Twice a week or more as needed.~~ \_\_\_\_\_
- D. How will you prevent littering on the property, streets and nearby properties?  
Employees will monitor the site to ensure the site is cleaned up on a regular  
basis. \_\_\_\_\_

**9. Will any hazardous materials, as defined by the state or federal government, be handled, stored, or generated on the property?**

Yes.       No.

If yes, provide the name, monthly quantity, and specific disposal method below:

NA  
\_\_\_\_\_  
\_\_\_\_\_

**10. Will any organic compounds (for example: paint, ink, lacquer thinner, or cleaning or degreasing solvent) be handled, stored, or generated on the property?**

Yes.       No.

If yes, provide the name, monthly quantity, and specific disposal method below:

All automotive maintenance related fluids are handled and stored in compliance with applicable state and federal requirements. Typical amounts for a 9 bay facility will be stored on site. It varies.  
\_\_\_\_\_

**11. What methods are proposed to ensure the safety of residents, employees and patrons?**

The property is proposed to be fenced and secured by a guard, with a guard house that controls entry and exit of vehicles and employees.

**ALCOHOL SALES**

**12. Will the proposed use include the sale of beer, wine or mixed drinks?**

Yes.  No.

If yes, describe alcohol sales below, including if the ABC license will include on-premises and/or off-premises sales. Existing uses must describe their existing alcohol sales and/or service and identify any proposed changes in that aspect of the operation.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**PARKING AND ACCESS REQUIREMENTS**

**13. Provide information regarding the availability of off-street parking:**

A. How many parking spaces are required for the proposed use pursuant to section 8-200 (A) of the zoning ordinance?  
61

B. How many parking spaces of each type are provided for the proposed use:  
393 \_\_\_\_\_ Standard spaces  
\_\_\_\_\_ Compact spaces  
\_\_\_\_\_ Handicapped accessible spaces  
\_\_\_\_\_ Other

- C. Where is required parking located? (check one) [x] on-site [ ] off-site

If the required parking will be located off-site, where will it be located?

Pursuant to section 8-200 (C) of the zoning ordinance, commercial and industrial uses may provide off-site parking within 500 feet of the proposed use, provided that the off-site parking is located on land zoned for commercial or industrial uses. All other uses must provide parking on-site, except that off-street parking may be provided within 300 feet of the use with a special use permit.

- D. If a reduction in the required parking is requested, pursuant to section 8-100 (A) (4) or (5) of the zoning ordinance, complete the Parking Reduction Supplemental Application.

14. Provide information regarding loading and unloading facilities for the use:

- A. How many loading spaces are required for the use, per section 8-200 (B) of the zoning ordinance? 3
B. How many loading spaces are available for the use? 3
C. Where are off-street loading facilities located? At the rear of the existing building.
D. During what hours of the day do you expect loading/unloading operations to occur? 6 a.m. to 5 p.m. daily.
E. How frequently are loading/unloading operations expected to occur, per day or per week, as appropriate? Daily.

15. Is street access to the subject property adequate or are any street improvements, such as a new turning lane, necessary to minimize impacts on traffic flow? Street Access is adequate.



September 4, 2012

Mr. John Komoroske, Chair  
and Members of the Planning Commission  
c/o Ms. Faroll Hamer, Director  
Department of Planning & Zoning  
City Hall, Room 2100  
Alexandria, VA 22314

Re: Docket Item No. 9, September 6<sup>th</sup> Planning Commission Meeting  
Enterprise Holdings Project at 4700 Eisenhower Ave.

Dear Mr. Komoroske and Members of the Planning Commission:

We are writing today to express our support for the Enterprise Holdings application for the re-use of the old Restaurant Depot site at 4700 Eisenhower Avenue as automotive staging and light repair for the company's retail locations, including at National Airport. Enterprise is an existing business in the City, and the Eisenhower Partnership would welcome them to the Eisenhower Valley.

This application is looking to keep this existing business here in the City by moving to Eisenhower Ave. This is a neighborhood that is changing, like the newly constructed Restaurant Depot site. This proposal seeks to improve the look of this site, while keeping an existing Alexandria business here in Alexandria. Currently Enterprise has 35 employees, and it looks to have as many as 50 employees at the new site. That's good for Eisenhower Valley and its good for the City of Alexandria as a whole.

We hope the Planning Commission agrees and recommends approval of Enterprise's application at your September 6<sup>th</sup> meeting.

Sincerely,

A handwritten signature in black ink that reads "Kay Tyler".

Kay Tyler, President

cc: Mary Catherine Gibbs, Esq.

Comments/Questions Re DSUP #2012-0007  
Enterprise RAC Company – 4700 Eisenhower Avenue  
Planning Commission Meeting of September 6, 2012 – Docket Item #9  
Submitted by Donald N. Buch (dnbuch@hotmail.com)

On June 13, 2012, I and several others met with the applicant's representative (Joseph Long), their attorney (Mary Catherine Gibbs) and a representative of P&Z (Pat Escher) at the site. It was my understanding that the applicant's intended use was essentially to make oil changes to rental vehicles and provide office space for some related personnel. I further understood that "the community" would be made aware when the staff report became available and the project was scheduled to be heard by the Planning Commission. Both understandings have clearly proven to be incorrect.

I specifically asked Mr. Long if the location was to be used as a staging area to store/shuttle "overflow" inventory back and forth to/from places such as the airport. I understood him to clearly say no. I further understood him to say this facility was not to perform repairs but simply to make oil changes which would be done during normal business hours.

It is only in the last 24 hours that I became aware of the staff report. As I rapidly read it, the following matters caught my attention. Perhaps the Planning Commission will deem some worthy of further clarification and consideration:

1. What are the environmental impacts of going from a restaurant supply warehouse to a vehicle servicing facility? How does one ensure that chemical, paint, etc. spills are adequately addressed and does the Commission believe this has been appropriately covered?
2. The staff report suggests this "represents a good interim use of the property". How long is "interim" and what is the anticipated longer-term use of the property? What leverage does the City have to see that the conversion to an implicitly "better" long-term use actually takes place?
3. What do "minor repairs" entail? Where will damaged vehicles be held? Page 23 states "no junked, abandoned, or stripped vehicles shall be displayed, parked, or stored outside." Given our experience on South Pickett, that still allows great leeway in terms of damaged vehicles visible to the public – they need not be junked, abandoned or stripped (whatever the definitions) to be a visual blight on their surroundings.
4. "Approximately 10,400 square feet of space will be dedicated for office uses" which seems an awful lot, given 50 total employees, many of whom are presumably servicing vehicles and won't have an office. But perhaps it doesn't matter so long as the space does not get reallocated to an unintended use?
5. There is a planned increase in impervious surface of 25,500 sq ft to accommodate 133 new parking spaces. Why? What are the environmental consequences? If this is an oil change facility with 10 bays each that could handle perhaps 2 vehicles per hour over, say, an 11 hour work day (7 am – 6 pm), that's 220 vehicles a day with each vehicle only being serviced for 30 minutes. Assuming Enterprise wants the vehicles back in the rental pool as soon as possible, assume the average vehicle is only on site for 3½ hours – being serviced for ½ hour and parked for 3 hours. That would amount to 60 parked vehicles at a time at a facility that already has 258 (391-133 new) available spaces. Which seems to beg the question of what is really intended for this site?
6. Note that the staff report states there will be 10 service bays but the application form states 9.

7. Note that the site is permitted to have a total of 64 spaces but the applicant is requesting 391.
8. What are the actual logistical dynamics of the anticipated vehicle movements over the course of a day (number, time, route to and from the site)?
9. The noted (staff report) 5:00 am to midnight hours of operation are hardly what many would consider a normal work day. The actual application form states 6:00 am – midnight (not to suggest that is a normal work day either).
10. What does no “significant car washing” (page 4) mean? Are there potential negative ramifications if we have a material misunderstanding of the term? In any event, page 23 says “no car washing shall be allowed.”
11. What are the three “loading spaces” for? – delivery of damaged and/or inoperable vehicles (presumably by tow truck)?
12. It is unclear how the Institute of Transportation Engineers standards lead to a projected 228 vehicle trips each day. With 50 office employees making at least 2 trips a day that is going to leave precious few attributable to 100s of vehicles being serviced each day. Per the estimates of paragraph 5 above, there would be 220 vehicles being serviced each day = another 440 trips. And the number of trips would logically increase substantially if, in fact, a primary use of this site is to shuttle vehicle inventory back and forth from the airport. Ramifications on local traffic conditions are not mentioned and would therefore appear to have not been considered.
13. Is this in keeping with our evolving vision for Eisenhower? To what extent might this impact potential future uses of adjacent property? For example, a 10-bay auto repair facility operating from 5 am until midnight might not be conducive to ever having a residential property next door. Can this have long-term implications as to what does or does not become of West Eisenhower?
14. To the extent that “freestanding signs shall be prohibited” what identification will be allowed on Eisenhower and in what manner? No monument sign?
15. What is the definition of “accumulate” with reference to parts, tires, other materials? (page 23).
16. Page 23, note 63 says “loading and unloading activities shall not occur between the hours of 11:00 pm and 7:00 am. Page 23, note 73 says “loading and unloading...shall take place...during hours of operation” (previously indicated to be 5:00 am until midnight). The Application form states “loading/unloading” will occur from “6 a.m. to 5 p.m. daily”.
17. What becomes of the 0.58 acres of “water quality volume left untreated”? How binding is what the “applicant should consider”?

Many of these questions may not have any material impact, irrespective of the response. However, the number of apparent inconsistencies might be the basis of some concern.

Thank you for your consideration.