

## **Development Special Use Permit #2025-10030**

### **220 & 224 S. Peyton Street - S. Peyton Mixed-Use Building**

<b>Application</b>	<b>General Data</b>	
<b>Project Name:</b> S. Peyton Mixed-Use Building	PC Hearing:	January 6, 2026
	CC Hearing:	January 24, 2026
	If approved, DSUP Expiration:	January 24, 2029
	Plan Acreage:	.1 acre (4,381 SF)
<b>Location:</b> 220 & 224 S. Peyton St.	Zone:	CD/Commercial Downtown
	Proposed Use:	Residential and commercial building
	Dwelling Units:	8
	Gross Floor Area:	10,540 SF
<b>Applicant:</b> Windmill Hill LLC by Lauren G. Riley, Attorney	Small Area Plan:	King Street Metro/Eisenhower Avenue
	Historic District:	Old & Historic Alexandria District
	Green Building:	2019 Green Building Policy
	Schools:	Lyles Crouch Traditional Academy George Washington Middle School Alexandria City High School

<b>Purpose of Application:</b> Development Special Use Permit and Site Plan to construct a building with ground floor commercial space and eight residential units on the upper floors.
<b>Special Use Permits and Modifications Requested:</b> 1. Development Special Use Permit and Site Plan to construct a building with residential and non-residential uses; 2. Special Use Permit to increase the non-residential FAR above 1.5 in the CD zone; 3. Special Use Permit for a parking reduction; 4. Modifications to side yard setback, open space and crown coverage requirements.
<b>Staff Recommendation: APPROVAL WITH CONDITIONS</b>
<b>Staff Reviewers:</b> Paul Stoddard, AICP, Director, Planning & Zoning <a href="mailto:paul.stoddard@alexandriava.gov">paul.stoddard@alexandriava.gov</a> Robert M. Kerns, AICP, Chief of Development <a href="mailto:robert.kerns@alexandriava.gov">robert.kerns@alexandriava.gov</a> Catherine Miliaras, AICP, Principal Planner <a href="mailto:catherine.miliaras@alexandriava.gov">catherine.miliaras@alexandriava.gov</a> Stephanie Sample, Urban Planner <a href="mailto:stephanie.sample@alexandriava.gov">stephanie.sample@alexandriava.gov</a>

**PLANNING COMMISSION ACTION, JANUARY 6, 2026:**

On a motion by Commissioner Koenig, seconded by Commissioner Manor, the Planning Commission voted to recommend approval of DSUP #2025-00030. The motion carried on a vote of 7 to 0.

Reason:

The Planning Commission agreed with the staff analysis.

Discussion:

Commissioner Brown inquired whether the residential units were multi-floor. Ms. Riley explained that each unit is one level, spread across the second and third floors.

Commissioner Dube inquired whether the first floor would be office use or retail. Ms. Riley responded that the 2700 SF commercial space could be used for office or retail.

Chair McMahon noted that the future residents will not be eligible for residential parking permits.

Commissioner Brown asked about other projects that have been approved without any parking. A project under construction in the 600 block of King Street was approved with a full parking reduction. Staff also noted that many existing mixed-use buildings up and down King Street do not have parking nor are residents eligible for parking permits. It is anticipated that this project will attract residents who do not have cars.

Commissioner Dube addressed the fire truck access stating that Page 11 of the Preliminary Site Plan illustrates the turning radii for fire trucks. He said he visited the site and did see cars parked in the traffic circle which would impede fire trucks being able to make the turn around the circle.

Chair McMahon inquired about the BAR process and whether they found it compatible with the Old and Historic Alexandria District. Staff explained that the applicant went through the BAR concept review process and they were generally supportive of the proposal, finding it contextual infill development.

Commissioner Ramirez inquired about what the parking occupancy is in this area, asking if staff knew the parking density in this area. Staff noted they can get the number of RPP 4 parking permits in this area and that there are several nearby garages with excess parking. Transportation and Environmental Services expects to review parking requirements/existing conditions soon, since the last time parking requirements were evaluated was in 2015.

Chair McMahon stated she is in support of the project and finds the proposed design to respond to the unusual shape of the site. She said that the development will be required to improve stormwater management, which will help with the flooding issues and that the location is optimal to transit, neighborhood services and the like. The requested SUP for an increase in FAR is in keeping with the neighborhood and this transitional location. The design with balconies and setbacks allows the scale to be in keeping with the neighborhood. She noted that it seemed odd that there is a side yard requirement here given the lot shape but was in support of the modification

to the side yard setbacks. In many parts of Old Town, it is hard to meet full open space and crown coverage requirements, so she also found those modifications to be appropriate.

Commissioner Koenig noted that he appreciates the neighbors' concerns but finds it to be a pragmatic solution for an infill project. It is a multi-faceted solution to a challenging site. He appreciated that each unit has its own outdoor space and that commercial space is also beneficial.

Commissioner Dube observed that neighbors have used the existing lot as a cut-through or access between Peyton and Commerce but there is no easement there. Ms. Riley confirmed that use of the private lot by others was not legal.

Commissioner Manor inquired whether ventilation to the roof was being provided from the commercial space. Ms. Riley said it was not.

Commissioner Brown noted that when he first saw the application, he was concerned with the number of requests for SUPs and modifications. However, he found that each request was modest and appropriate. He agreed with his colleagues that this is a creative solution for this site.

Speakers:

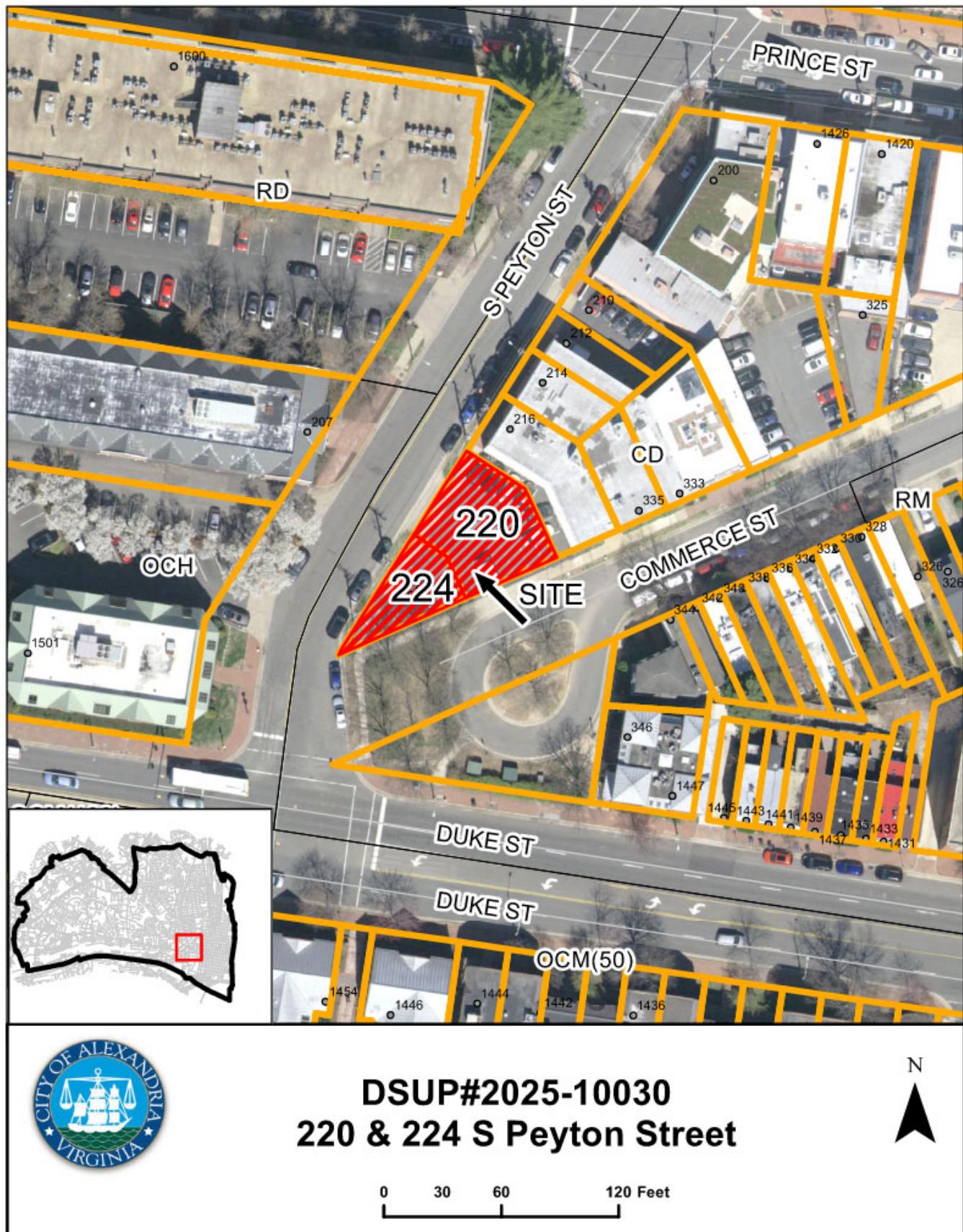
Andrew Herseth, residing at 336 Commerce Street and representing nine neighboring property owners who submitted a letter expressing concerns. One concern he highlighted regarded emergency access from Commerce Street because he stated that the parking lot serves to provide emergency access. This proposal requires a special use permit and does not meet requirements – the increased development will increase flood risks and add to parking challenges. He recommended more conditions related to the approval.

Karen Griffin, resident at 328 Commerce Street, had to travel by ambulance in 2020 and the ambulance used the parking lot to exit Commerce Street, and it was challenging for the ambulance to go over the curbs. She concurs with her neighbor's statement and is very concerned about parking. She hopes the green space will not be reduced.

Tim Foley, resident at 310 Commerce Street, said that while the development looks nice, he is very concerned about pressure on residential parking in this area and that additional parking pressure will devalue other properties. Many neighbors must find parking elsewhere. Flooding is a problem in this area because the cul-de-sac fills with water (could be due to a clogged drain). He also has concerns about emergency vehicle access, particularly if the daycare is doing pick-up/drop-off.

Thomas Maresh, resident at 342 Commerce Street, is concerned about the increased density and the impact of the project on Commerce Street, which has many historic properties. He thinks that it does not meet the requirements of the Old and Historic Alexandria District.

Lauren Riley, project attorney, spoke in support of the project.



## **I. SUMMARY**

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

Staff recommends **approval** of the request to construct a building with ground floor commercial space and eight residential units at 220 & 224 S. Peyton Street. The completed project will provide several community benefits, including:

- Redevelopment of a surface parking lot;
- Creation of eight one-bedroom housing units and new ground-floor commercial space;
- Removal of curb cuts on two public streets;
- Streetscape improvements consisting of continuous sidewalks and street trees;
- High-quality building design;
- Approximately \$30,889 in contributions to the Urban Forestry Fund (\$1,052) and the Housing Trust Fund (\$27,337), and including a contribution to the purchase of a freestanding parking meter (\$2,500);
- Stormwater improvements which exceed the minimum treatment requirement twofold;
- Compliance with the Green Building Policy; and,
- On-site public art, or a contribution of approximately \$3,162.

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

The applicant, Windmill Hill, LLC, requests approval of a three-story building at 220 & 224 S. Peyton Street, a triangular-shaped property with street frontage on both S. Peyton and Commerce streets. The eight-unit building will have ground floor commercial (office) space and open spaces for both commercial and residential users. No parking is proposed with this project.

The following approvals are requested with this project:

- Development Special Use Permit and Site Plan to construct a residential and commercial building with:
  - Special Use Permit to increase the commercial FAR above 1.5 in the CD zone;
  - Special Use Permit for a parking reduction;
  - Modifications to side yard setback, open space and crown coverage requirements.

## **II. BACKGROUND**

### ***A. Site Context***

The small (.1 acre) project site is located within the boundaries of the King Street Metro/Eisenhower Avenue Small Area Plan and the Old and Historic Alexandria District (OHAD). The triangular shaped surface parking lot has frontage on S. Peyton Street and the dead-end Commerce Street, which terminates in a turnaround. The site is close to Duke Street and there is a public open space at the terminus of the Commerce Street right-of-way adjacent to the site. It is surrounded by a mix of uses, including educational, residential and commercial.



Figure 1: Aerial view of project site

### ***B. Detailed Project Description***

The three-story triangular building proposed reflects the site layout with setbacks at the second and third floors. The 10,540 gross square foot building will have the largest footprint on the ground floor, with the roofs of the lower floorplates providing roof decks for the south-facing apartments. The remaining residential units will also have balconies, and the triangular at-grade open space will provide outdoor space for the office tenants. Building materials consist mainly of brick masonry and metal panels, with detailing provided by projecting bays and cornices and roof deck fins that will provide some shade to the south-facing residents as well as visual interest. The applicant proposes a trellis-like architectural element in the front courtyard to frame the space.

No parking will be provided in the building due to the small size and unusual lot shape, as well as the availability of numerous transit facilities nearby (see below for the discussion related to the requested parking reduction). The rental units will be marketed to reflect the lack of parking and tenants will be directed to nearby garages/lots offering monthly parking should the tenant have a car.

The commercial entrance will be located on S. Peyton Street, while the apartment entrance and trash pick-up will occur on Commerce Street. There will be 24-hour active loading and curbside pick-up/drop-off zones in front of each entrance to allow delivery vehicles like Amazon, DoorDash, Uber, etc., to have a place to park outside of the active travel lane.



Figure 2: Building rendering from southwest

### ***C. Community Outreach***

The applicant hosted two virtual community meetings and attended a BAR hearing. At the first community meeting, attendees had questions and concerns about how the building would impact parking and traffic around the site and the compatibility of the building with the historic townhouses across Commerce Street to the southeast. They also had questions about the project's impact on neighboring properties like the school across S. Peyton Street (St. Colleta's School) and the daycare center (Blue Bird) at the Commerce Street turnaround, both of which have very active drop-off and pick-up times. At the second meeting, one community member reiterated concerns about the building's compatibility, on-street parking, and the presence of the unit balconies providing views into neighboring properties. New residents in the building will not be eligible for on-street parking because the site will not be in a Residential Parking Permit district (see discussion below under *Parking & Loading*).

The project concept was discussed on September 3, 2025, at the BAR public hearing, and the Board was generally supportive of the building and recommended that the applicant explore some minor architectural refinements prior to returning for a Certificate of Appropriateness following the project's approval at City Council.

**Table 1 – Community Meetings**

Meeting	Date	Attendees
Applicant-hosted community meeting	8.4.2025	14 community members
BAR Concept Review	9.3.2025	1 community member spoke at the hearing
Applicant-hosted community meeting	10.22.2025	3 community members
P&Z Virtual Meeting	10.30.2025	17 community members

### **III. ZONING**

**Table 2 – Zoning Tabulations**

<b>Property Addresses</b>	220 & 224 S. Peyton St.	
<b>Total Site Area</b>	4,381.5 SF (.10006 acres)	
<b>Existing Zone</b>	CD/Commercial Downtown Zone	
<b>Current Use</b>	Surface parking	
<b>Proposed Use</b>	Residential and commercial building	
	<i>Permitted/Required</i>	<i>Proposed/Provided</i>
FAR	1.25 (residential) 1.5 (non-residential) 2.5 (with SUP)	1.25 residential <u>.62 non-residential</u> 1.87 <sup>1</sup>
Height	50'	38.25'
Setbacks	Front (Commerce St.): 0' Front (S. Peyton St.): 0' Side: 1:3 (25' min) Rear: N/A	Front (Commerce St.): 5' Front (S. Peyton St.): 0' Side <sup>2</sup> : 0' Rear: N/A
Open Space	35% required (1,534 SF)	21.2 % provided (930 SF) <sup>3</sup>
Crown Coverage	25% required (1,096 SF)	13% provided (570 SF) <sup>4</sup>
Parking	6 spaces (residential) <u>1 space (commercial)</u> 7 spaces total required	0 <sup>5</sup>
Loading Spaces	0	0

<sup>1</sup> SUP for FAR increase requested.

<sup>2</sup> Side yard setback modification requested.

<sup>3</sup> Open space modification requested.

<sup>4</sup> Crown coverage modification requested.

<sup>5</sup> SUP for parking reduction requested (seven space reduction).

## **IV. STAFF ANALYSIS**

### ***A. Conformance with the Master Plan and City Policies***

#### **King Street Metro/Eisenhower Avenue Small Area Plan**

The King Street Metro/Eisenhower Avenue SAP was adopted in 1992 and provides long-range guidance for neighborhoods surrounding the King Street and Eisenhower Metrorail Stations. The Plan acknowledges the transit-rich neighborhood, and one principle states “mixed use development at relatively high densities should be encouraged near the two transit stations” (page 46). The plan’s primary goal is “to create lively, mixed-use office, retail, residential and hotel development supported by open space, recreational, entertainment and cultural amenities” (page 55). The proposed project will modestly increase the number of residents in the neighborhood and enhance the mixed-use character in this transitional area, implementing the plan’s objective to encourage “quality, high-density mixed-use development” near the King Street Metro Station.

#### **Green Building Policy**

The applicant has indicated the project will meet the 2019 Green Building Policy by achieving National Green Building Standard 2020 for New Homes. The project will also earn Energy Star version 1.1, multifamily certification which represents an estimated 25% improvement over current Virginia energy code. The building will be third party inspected and certified in accordance with Energy Star, with the work performed by a RESNET Certified Rating Quality Assurance Provider, a Certified HERS rater, and Home Innovations NGBS certified verifiers. An energy model will be completed for each of the units; the applicant has provided a preliminary model estimate for one typical unit (Unit #7) and that model estimates an energy use intensity of 33 kBtu/sf/yr.

The all-electric building will employ several energy efficient building features, from high-efficiency LED lighting, low-flow water fixtures, and Energy Star appliances, and will construct the roof such that it can accommodate future solar panels. The project is providing no parking onsite due to its proximity to a robust transit network, thus there will be no electric vehicle charging infrastructure provided on-site.

#### **Public Art Policy**

In December 2014, the City Council adopted the Public Art Policy which established a monetary contribution requirement towards public art for development projects. The contribution can be used for public art on the site or a monetary contribution to further the City’s public arts efforts in the neighborhood. The contribution amount is \$0.30 per gross square foot of development, or approximately \$3,162 for this project. The applicant has not yet decided whether public art will be provided on-site or if a contribution will be made.

#### **Affordable Housing Policy**

The proposed redevelopment of the underutilized site will add to the supply of market-rate rental housing. The applicant has agreed to provide a voluntary monetary contribution of \$27,337 to the Housing Trust Fund consistent with the City’s Affordable Housing Contribution Procedures. It is noted that the project

is not seeking bonus density and is not subject to on-site committed affordable unit requirements. The voluntary contribution will advance the implementation of the City's Housing Master Plan recommendations which include investments in public-private affordable housing partnerships and support for down payment assistance programs for first-time homebuyers.

### ***B. Site, Building Design and Board of Architectural Review (BAR)***

The proposed building brings a high-quality and contextual design to replace an underutilized surface parking lot. The building form reflects the unique lot shape and adds to the diverse collection of building types in the immediate neighborhood, from historic buildings to 1980s era office and residential buildings. The building design is appropriate for this transitional area near both townhouses and smaller scale commercial buildings. The stepped back design with terraces allows the building to fit comfortably within its context and not overwhelm smaller nearby buildings. The applicant designed the project such that the entrance to the residential portion of the building is located off the more residential street (Commerce) and the commercial entrance on the busier street. Removal of the curb cuts will help to create a safer and more pedestrian-friendly streetscape on both sides of the building. The ground-floor commercial space and open space overlooks the public open space to the south will bring activity to the street.

#### **BAR Refinements**

The Board was supportive of the in-fill project and requested that the applicant study certain architectural refinements prior to returning for a Certificate of Appropriateness, including brick detailing and color, scale of the first-floor columns, the terrace dividers, the feasibility of retractable canopies, and a bay window on Commerce Street. The applicant was receptive to the Board's recommendations.

### ***C. Special Use Permit Requests***

Section 11-500 of the Zoning Ordinance gives authority to the City Council to approve Special Use Permits (SUPs). The Zoning Ordinance requires the approval of the SUPs associated with the development application:

1. Will not adversely affect the health or safety of persons residing or working in the neighborhood of the proposed use;
2. Will not be detrimental to the public welfare or injurious to property or improvements in the neighborhood; and
3. Will substantially conform to the master plan of the city.

#### *Increase in Non-residential FAR above 1.5*

The proposal includes a residential FAR of 1.25 and a non-residential FAR of .62. A special use permit is required for the additional FAR above 1.5 in the CD zone, for a total project FAR of 1.87. The commercial square footage amount of 2,900 gross square feet is approximately one-third of the overall building size. The applicant intends to use the space as their business office upon completion of the project though its design could also function as retail in the future.

Based on the three criteria City Council considers in its approval of SUPs, staff supports this approval due to the following:

1. The increased density will not have an adverse effect on area residents and workers, as the building is designed to be compatible and fits within this transit-rich area.
2. The increase in density allows for a diversity of uses and an increase in high-quality commercial space in the neighborhood and will provide improvements to the public realm.
3. Allowing added density at this site is consistent with the goals and recommendations of the King Street Metro/Eisenhower Avenue SAP, providing a mix of uses and new housing opportunities.

#### *Parking Reduction*

The applicant has requested a full parking reduction from the required 7 spaces to zero spaces. The applicant will advertise the residential units without parking in hopes of attracting car-free tenants. There are several nearby garages that offer monthly parking if future residents desire parking. Further, the size and shape of the site make on-site parking, particularly below grade, nearly impossible to provide with this modest development site. The project tenants will be ineligible for a Zone 4 parking district sticker (See the Parking & Loading section below for the full discussion.)

Based on the three criteria City Council considers in its approval of SUPs, staff supports this approval due to the following:

1. The project site is well served by a walkable and bikeable street grid, with various bus lines nearby and within a quarter mile walk to the King Street Metro Station.
2. The transit-rich area of the project will attract those less dependent on cars and the need for parking. In addition to the multi-modal transit options, there are many neighborhood serving services and retail options nearby.
3. Reducing parking in transit-rich areas is a recommendation of the King Street/Eisenhower Avenue SAP.

#### ***D. Site Plan Modifications***

As part of this DSUP, the applicant is requesting three modifications. Pursuant to Section 11-416 of the Zoning Ordinance, the Planning Commission may approve these modifications if they determine such modifications:

1. Are necessary or desirable to good site development.
2. That specific and identified features of the site design compensate for the impacts otherwise protected by the regulations for which the modification is sought.
3. That such modification will not be detrimental to neighboring property or to the public health, safety and welfare.

#### *Side Yard Modification*

Given the unusual lot shape, the site has two front yards and one side yard setback requirements. The proposed building therefore requires a side yard setback modification so that the building can abut the property line and the adjacent window-less building wall to the north.

Based on the criteria listed above that Planning Commission uses to approve modifications, staff supports the modification for the following reasons:

1. The modification will facilitate a site design that maximizes the unusual site layout and is compatible with the mixed-use nature of the immediate neighborhood.
2. The side yard modification allows for the building to sit immediately adjacent to the blank wall of the adjacent building, allowing for open space at the south end of the site.
3. The modification is not unusual in the historic district where most buildings are constructed at the property lines.

#### *Open Space Modification*

While the commercial designation of the first floor has no open space requirement, the residential component has a 35% open space requirement (or 1,534 square feet). Staff notes the design of the building has been maximized to provide private open space for each residential tenant. Though not required, the commercial open space will provide a green edge to the project and usable space for the office tenant.

Based on the criteria listed above that Planning Commission uses to approve modifications, staff supports this modification for the following reasons:

1. The modification is necessary to allow for a viable project with a mix of uses on a small, irregularly shaped lot.
2. The new project will provide highly functional open space areas for all building tenants and residents will equally benefit from the adjacent City greenspace at the termination of Commerce Street.
3. The reduced amount of on-site open space is consistent with other properties in this dense, transit-rich area of Old Town.

#### *Crown Coverage Modification*

The applicant has requested a modification to the 25-percent crown coverage requirement (1,096 square feet), providing approximately half of the required amount through tree and shrub plantings on the street fronting elevations and in the triangular open space. Being an urban infill project, it is not unusual for applicants to request modification for crown coverage. While they do not count toward crown coverage requirements, the seven new street trees will significantly soften the project edge and contribute to City-wide canopy goals.

Based on the criteria listed above that Planning Commission uses to approve modifications, staff supports this modification for the following reasons:

1. The proposed building footprint and site layout are consistent with implementing the goals in the King Street Metro/Eisenhower Avenue SAP and remove an impervious surface parking lot.
2. The combination of on-site and off-side crown coverage will mitigate the proposed modification.
3. The reduced amount of crown coverage will not have an adverse impact on neighboring properties and will in fact be a significant improvement over the surface parking lot. The applicant's contribution to the Urban Forestry Fund will fund tree plantings in the vicinity that will positively impact neighboring properties.

## ***E. Open Space and Crown Coverage***

### **Open Space**

Only the residential component of the project is required to provide open space, though the project includes an open space component for the commercial user (see the open space modification section above). Each of the eight rental units will have their own balcony/roof deck, though only half of them meet the 8' by 8' open space definition. Nonetheless, the smaller balconies will still provide functional and usable space for residents.

<b>Open Space</b>	<b>Amount</b>
Required per CD (residential only)	1,534 SF (35%)
Provided	930 SF (21.1%)
<i>At-grade private</i>	300 SF (32% of provided)
<i>Above grade public</i>	630 SF (68% of provided)

### **Crown Coverage and Tree Preservation**

The project requires 25 percent crown coverage, which is more challenging in the dense urban, portion of the city, especially when the building footprint fills the site (see the discussion above regarding the crown coverage modification). The applicant will plant six new street trees, five on S. Peyton Street and one on Commerce. The adjacent City right-of-way at the terminus of Commerce Street is a bermed landscaped open space with several trees, two will be impacted by construction and will be replaced by the applicant. The applicant will add tree protections around a third tree in the city open space (T-0005) to protect the root system; however, if the tree does not survive, a new tree will be installed by the applicant.

## ***F. Streetscape***

The applicant's streetscape improvements include a new six-foot-wide concrete sidewalk on both S. Peyton and Commerce streets, and a continuous planting strip on both streets where the existing curb cuts will be removed. Two new streetlights will also be installed, along with a bike rack on S. Peyton Street.

## ***G. Stormwater***

The applicant proposes two BMPs consisting of a stormwater planter box and an underground hydrodynamic BMP. The project complies with Article XIII stormwater requirements and exceeds the minimum treatment requirement by twofold and provides a 14% reduction in phosphorus runoff compared to existing conditions. The project also meets all flood protection and channel protection requirements, ensuring no adverse downstream impacts. Currently, the site is almost entirely impervious and contains no existing stormwater BMPs.

## ***H. Transportation***

### **Parking and Loading**

As described above, no parking is proposed with the development, and no loading space is required. However, both street frontages will have curb side 24-hour active loading zones, allowing for any loading/un-loading/deliveries to take place out of the travel lane.

The current boundary for the District 4 Residential Permit Parking District bisects the project site. To respond to concerns about residential parking and to provide clarity about RPP eligibility, staff will bring a proposal to the Traffic and Parking Board in January to modify the RPP boundary to fully exclude this property and the future building from the District 4 boundaries. This will make residents at this address ineligible for District 4 parking permits and guest/visitor parking permits. While this development is intended to attract car-free tenants, residents at this building that do have cars can obtain monthly parking at one of several nearby parking garages.

The applicant will contribute \$2,500 to the purchase of a multi-space meter to be located on Peyton Street south of the project site, replacing the existing standard 3-hour parking signs.

### **Transit and Bicycle Facilities**

The site is in a transit-rich, walkable neighborhood of Old Town, approximately 6 minutes by foot to the King Street Metrorail Station. As well as being the gateway to Old Town, King Street Station is a major transfer hub along the Blue and Yellow Line to more than 10 DASH, WMATA, and other regional bus routes. A list of all the local and regional bus routes provided for riders at the King Street Metrorail station are provided below.

***Table 3 – Bus Routes***

<b>Location</b>	<b>Route Destination</b>	<b>Location</b>	<b>Weekday</b>	<b>Weekend</b>	<b>Operator</b>	<b>Terminus</b>
King St Metro A71	Ballston Metro	A	Y	Y	<b>metrobus</b>	Y
King St Metro 31	NVCC Alexandria	A	Y	Y	<b>DASH</b>	
King St Metro F23	George Mason	B	Y	Y	<b>metrobus</b>	Y
King St Metro F24	Vienna Metro	B	Y	Y	<b>metrobus</b>	Y
King St Metro 30	Van Dorn St Metro	B	Y	Y	<b>DASH</b>	

King St Metro F20	Tysons Metro	C	Y	Y	<b>metrobus</b>	Y
King St Metro KST	King St Trolley	E	Y	Y	<b>DASH</b>	Y
King St Metro 30	Braddock Rd Metro	F	Y	Y	<b>DASH</b>	Y
King St Metro 31	Braddock Rd Metro	F	Y	Y	<b>DASH</b>	
King St Metro 32	Landmark	G	Y	Y	<b>DASH</b>	Y
King St Metro 33	Potomac Yard Metro	H	Y	Y	<b>DASH</b>	Y
King St Metro 102	Mark Center	H	Y		<b>DASH</b>	Y
King St Metro P90	Suitland Metro	J	Y	Y	<b>metrobus</b>	Y
King St Metro F1X	Ft Belvoir	K	Y	Y	<b>metrobus</b>	Y

With respect to walkability, as defined by the City's Walkability Index, the site receives a score of 90 or greater (i.e., 90-100), otherwise known as a "Walker's Paradise," with access to all daily transportation and personal needs within walking distance of the location. In addition to site's immediate proximity (i.e., 0.2mi) to the King Street Metrorail Station and surrounding amenities, there are also on-street bicycle facilities nearby on Prince Street and a Capital Bikeshare station one-block to the north on Peyton. In furtherance of the site's walkability, the applicant will install a new public bicycle rack on S. Peyton Street. For tenants with bicycles, they will have access to a vertical bike storage room inside the building.

### ***I. Traffic***

The road network in the vicinity of the project site experiences increased traffic congestion around school pick-up and drop-off on S. Peyton Street and Commerce Street, and rush hour on nearby Duke Street. Staff understands that some daycare parents have been using the private lot for pick-up and drop-off; however, the only leased spaces on the lot are associated with nearby commercial tenants.

The size of the project does not trigger a traffic study, and the trip generation shows significantly reduced trips from the existing AM and PM peak (for a surface parking lot) to the new use. The proposed development will generate less than 50% of the trips associated with the current land use, resulting in less traffic on surrounding roadways.

### ***J. School Impacts***

The student generation rate for the eight residential units in this low-rise building will be .56 students, equivalent to one student (based on a generation rate of .07). This project is in the Lyles Crouch Traditional Academy, George Washington Middle School, and Alexandria City High School attendance areas. City and ACPS staff will monitor and integrate the projected student generation numbers in forthcoming school enrollment projections and ACPS will continue to coordinate with the City to review, plan and allocate resources.

## **V. CONCLUSION**

Staff recommends approval of the project subject to compliance with all applicable codes and the following staff recommendations.

*Staff:* Paul Stoddard, AICP, Director, Planning & Zoning  
Robert M. Kerns, AICP, Chief, Development Division  
Catherine Miliaras, AICP, Principal Planner, Development Division  
Stephanie Sample, Urban Planner, Development Division

## VI. ADDITIONAL GRAPHICS

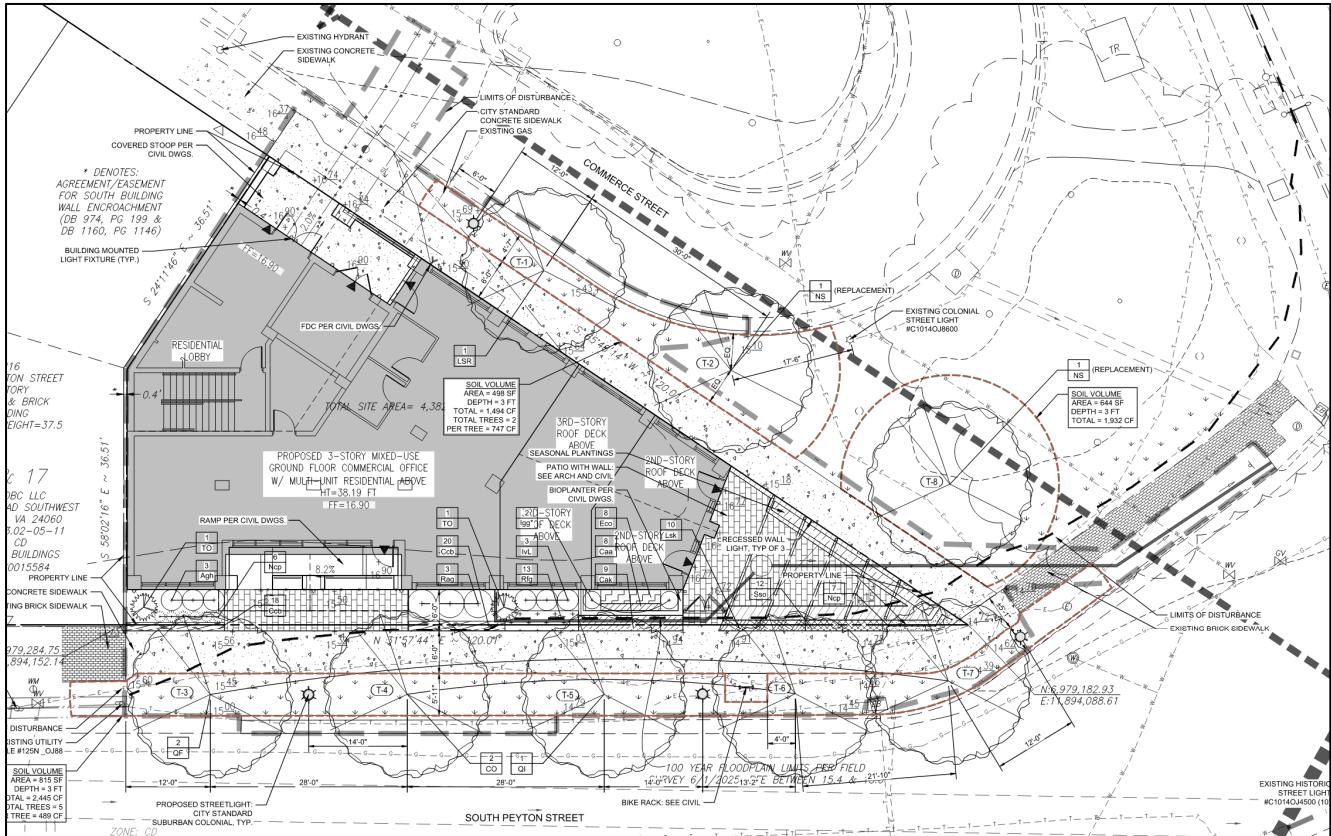


Figure 3: Proposed landscape plan



Figure 4: Aerial of the proposed project



Figure 5: S. Peyton Street proposed elevation

Development Special Use Permit #2025-10030  
220 & 224 S. Peyton Street



Figure 6: Commerce Street elevation of the proposed project

## **VII. STAFF RECOMMENDATIONS**

1. The Final Site Plan shall conform substantially with the preliminary plan dated October 24, 2025, and comply with the following conditions of approval.

### **I. SITE PLAN**

2. Per § 11-418 of the Zoning Ordinance, the Development Special Use Permit shall expire and become null and void, unless the applicant commences substantial construction of the project within 36 months after initial approval and the applicant thereafter pursues such construction 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 if they have not yet commenced substantial construction. The applicant may petition to extend the validity period after adequate notice and a public hearing. (P&Z)
3. Submit the plats and associated deeds for the applicable dedication identified in the Preliminary Plan dated October 24, 2025. The applicant must obtain approval of the plat(s) prior to or concurrent with Final Site Plan release. Provide proof of recordation with the first application for a building permit. (P&Z) (T&ES) \*, \*\*
4. Make all fee simple conveyances to the City with General Warranty of title (unless not available) or provide the current ALTA survey and Title Report that includes the areas to be dedicated to City. Include the City as an authorized user of the ALTA survey for any purposes that the City deems necessary, including obtaining title insurance. Submit the ALTA survey and Title Report for review prior to approval of subdivision plat and deed by City. (T&ES) \*
5. Show site utilities compatibly with other conditions on the site plan to the satisfaction of the Directors of P&Z, T&ES prior to Final Site Plan release, specifically: (P&Z) (T&ES) \*
  - a. Locating above grade service openings and required clearances for items such as transformers, telephone, HVAC units, and cable boxes.
  - b. Minimizing conflicts with plantings, pedestrian areas, and major view sheds.
  - c. Ensuring any necessary above-grade utilities do not reduce the amount of dedicated open space or trees provided.
  - d. Screening all utilities from the public right-of-way.
  - e. Undergrounding of overhead utility lines shall be done in consultation with Dominion Energy and the City, with the goal of avoiding additional poles in front of other properties to the extent feasible, to the satisfaction of the Director of P&Z.
6. Provide a lighting plan prior to Final Site Plan release, unless otherwise identified below, to verify that lighting meets the City's Design and Construction Standards. The plan shall be to the satisfaction of the Directors of P&Z, T&ES, Code, and the Climate Action Officer of OCA and shall include: (P&Z) (T&ES) (OCA) (Code) \*

- a. 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.
- b. All site lights designed to meet City of Alexandria photometric standards shall have photovoltaic switches.
- c. The location of conduit routing between site lighting fixtures to avoid conflicts with street trees.
- d. Light fixtures for the open canopies shall be recessed into the ceiling for any areas visible from the public right-of-way. \*\*

7. Provide a georeferenced CAD file in AutoCAD 2018.dwg or greater format that adheres to the National CAD Standards prior to Final Site Plan release. The file shall have the dimension plan including existing conditions, proposed conditions, and grading elements. If proposing a subdivision, include the existing and new parcels and neighboring parcels. Identify legal lot numbers for each lot and document the square footage. Show adjacent lots and their Tax Map numbers on the subdivision plat. (GIS) \*

## A. BUILDING

- 8. Provide a building code analysis with these building code data prior to Final Site Plan release: (1) use group, (2) number of stories, (3) type of construction, (4) total floor area per floor, (5) height of structure, (6) non-separated or separated mixed use, (7) fire protection system requirements, and (8) accessible routes. (P&Z) (Code) \*
- 9. Provide a unit numbering plan for each floor of a multi-unit building prior to Final Site Plan release. The unit numbers shall comply with a scheme of 100 level numbers on the first floor, 200 level numbers on the second floor, and continue in this scheme for the remaining floors. Indicate the use of each unit (i.e., residential, retail, office). (GIS) \*
- 10. The total number of residential units may be adjusted higher or lower so long as the new unit count does not increase the building envelope, parking is provided per the Zoning Ordinance or Parking Reduction SUP, and the building is in substantial conformance with the preliminary plan to the satisfaction of the Director of P&Z. (P&Z) (BAR)\*
  - a. Minor changes to the façade fenestration and details will be permissible, including but not limited to, window count and alignment, to be coordinated with sustainability envelope attributes and energy performance submission, provided the changes are approved by the Board of Architectural Review.
  - b. The Sanitary Adequate Outfall Analysis must reflect the actual number of units.
  - c. The unit count must be finalized prior to Final Site Plan release.
- 11. The building design, including the appearance, color, and quality of materials; final detailing; three-dimensional expression; and depth of all plane changes, shall be consistent with the Certificate of Appropriateness and the following conditions. Provide this information regarding materials and design to the satisfaction of the Director of P&Z prior to Final Site Plan release: (P&Z) (Code) (OCA) (BAR) \*

- a. Where fiber cement façade panels are permitted, they shall not use a wrap-around trim for mounting to the substructure but may use either a batten system to conceal the joints or a rainscreen type installation. If exposed fasteners are proposed, they may be either concealed or if exposed, shall be finished to match the adjacent panels and their location integrated into the overall design. The underside of all balconies shall be finished and present a visually cohesive appearance.
- b. The underside of all balconies shall be finished and present a visually cohesive appearance.
- c. Coordinate the design, color, and materials of all penthouses, rooftop mechanical areas, and rooftop screening with the overall architecture of the building, as regards massing, materials, and detailing/expression. Roof surfaces must be light-colored with green roofs encouraged as an alternative.
- d. The recessed or projecting depth of brick rustication must be a minimum of 3/4 inches.
- e. Where plane changes in facades are proposed, they shall generally not be less than two feet.
- f. Where dissimilar materials meet, they must typically meet at an interior corner; where that is not possible, such transitions shall occur at a significant plane change or reveal.

12. Provide detailed drawings in realistic colors to permit evaluation of key building elements such as the building base, entrances, entry canopy, stoops, windows, balconies, railings, cornices, and other ornamental elements, and material details including the final detailing, finish, and color of these elements prior to Final Site Plan release. (P&Z) \*

- a. The drawings shall be enlarged and coordinated plan-section-elevation studies, typically at  $\frac{1}{4}'' = 1'-0''$  scale, with shadows cast at 45 degrees from both left and above to show true depth of recesses and projections.
- b. Separate design drawings shall be submitted for each primary building typology, different wall, or bay type.

13. Provide the items listed below to allow Staff to review the materials, finishes, and architectural details. These materials shall conform substantially to the preliminary plan and the current *Guidelines for Preparation of Mock-Up Panels*, Memo to Industry effective at application submission. (P&Z) (Code)(BAR)

- a. Samples of actual window glazing, frame, and sash components proposed for each area of the building in the color and material that will be provided (may reduce sample sizes for ease in handling). \*

14. Before ordering final building materials, provide a materials board that includes all proposed materials and finishes prior to Final Site Plan release. The materials board shall remain with P&Z until the issuance of the final Certificate of Occupancy, when Staff will return all samples to the applicant. (P&Z) \*, \*\*\*

- a. Staff may request more detailed/extensive materials relating to the proposed fenestration, such as samples of the glazing, frame, and sash components, and

- b. including whether the windows will be double-or-triple glazed and have simulated divided lights.
- b. Materials may be modified or substituted only if in substantial conformance with the Preliminary Site Plan approval and the Certificate of Appropriateness, to the satisfaction of the Director of P&Z. \*
- c. Drawings of mock-up panel(s) that depict all proposed materials, finishes, and relationships as part of the Final Site Plan. \*
- d. A mock-up panel using the approved materials, finishes, and relationships shall be constructed on-site or at an agreed upon location in the vicinity for Staff review and approval. Per VCC108.2 concrete or masonry mock-up panels exceeding 6-ft. require a building permit. The panel(s) shall be constructed and approved prior to vertical (above-grade) construction and before ordering building materials. Locate the panel so that it receives sunlight from the same predominant direction as will the finished structure. \*\*
- e. The mock-up panel shall remain in the same location and visible from the right-of-way without entering the site throughout construction until the issuance of the first Certificate of Occupancy. To the extent that the mock- up panel is located on site and needs to be relocated during construction due to site constraints, the Applicant shall obtain approval for any new location from P&Z and Code prior to relocation.\*\*\*

## **B. OPEN SPACE/LANDSCAPING**

- 15. Develop a palette of site furnishings for review and approval by Staff prior to Final Site Plan release. (P&Z) (T&ES) \*
- 16. Site furnishings may include benches, bicycle racks, trash bins, recycling receptacles, and other associated features. City standard materials are mandatory in all furnishings in the public right-of-way.
- 17. Provide material, finishes, and architectural details for all retaining, seat, decorative, and screen walls prior to Final Site Plan release. Indicate methods for grade transitions, handrails, directional changes, and above and below-grade conditions. Coordinate with adjacent site and building conditions. The design and construction of all walls shall be to the satisfaction of the Directors of P&Z, T&ES, and Code. (P&Z) (T&ES) (Code) \*

## **C. TREE PROTECTION AND PRESERVATION**

- 18. Provide a Tree and Vegetation Protection Plan per the City of Alexandria's Landscape Guidelines for approval prior to Final Site Plan release and implement the plan for the duration of construction. When the Applicant is responsible for the protection and preservation of City-owned trees (within right-of-way, park, etc.), the applicant shall provide signage indicating that the trees are under private management and maintenance for the period of construction and maintenance bond. The applicant shall make efforts to preserve Tree T-005 as shown on the plans, as requested by the City. If Tree T-005 cannot be preserved, the applicant will replace the tree on a one-to-one basis. (P&Z) \*

## D. ARCHAEOLOGY

19. Hire an archaeological consultant to complete a Documentary Study and an Archaeological Evaluation as outlined in the City of Alexandria's Archaeological Standards prior to Final Site Plan release. If archaeological work needs to occur alongside demolition and construction activities, then the applicant must demonstrate this necessity to the satisfaction of the City Archaeologist. If the applicant discovers significant resources, then the consultant shall complete a Resource Management Plan, as outlined in the City's Archaeological Standards. Implement the preservation measures listed in the Resource Management Plan, as approved by the City Archaeologist. (Archaeology) \*
20. Complete all archaeological fieldwork or prepare a Resource Management Plan subject to review and approval by the City Archaeologist prior to Final Site Plan release, Grading Plan release, or any other permit issuance involving ground disturbing activities (e.g., coring, grading, filling, vegetation removal, undergrounding utilities, pile driving, landscaping, and other excavations defined in § 2-151 of the Zoning Ordinance). (Archaeology) \*
21. Call Alexandria Archaeology at 703.746.4399 two weeks before starting any ground disturbance activities to establish an inspection or monitoring schedule with City archaeologists. Include the preceding text on all Final Site Plan sheets involving any ground disturbing activities. (Archaeology) \*
22. Call Alexandria Archaeology immediately at 703.746.4399 if you discover any buried structural remains (wall foundations, wells, privies, cisterns, etc.) or concentrations of artifacts during development. Cease work in the discovery area until a City archaeologist inspects the site and records the finds. Include the preceding text on all Final Site Plan sheets involving any ground disturbing activities. (Archaeology) \*
23. The applicant shall not allow any metal detection and/or artifact collection to be conducted on the property, or allow independent parties to collect or excavate artifacts, unless authorized by Alexandria Archaeology. Failing to comply shall result in project delays. Include the preceding text on all Final Site Plan sheets involving any ground disturbing activities. (Archaeology) \*
24. Construct and install all interpretive elements or markers and submit the final archaeological report for review and approval by the City Archaeologist prior to receipt of the final Certificate of Occupancy. (Archaeology) \*\*\*
25. Hire a professional consultant to work with Staff and the landscape designers to incorporate and interpret elements of the historic character and archaeological findings into the design of the open space and to prepare interpretive elements to install as part of the project. Indicate themes and locations of the interpretive elements in the site plan and provide text and graphics for the signage subject to review and approval by the Office of Historic Alexandria/Alexandria Archaeology prior to issuance of the Certificate of Occupancy. (Archaeology) \*\*\*

## **E. PEDESTRIAN/STREETSCAPE**

26. Provide the pedestrian improvements listed below to the satisfaction of the Directors of P&Z and T&ES. Complete all pedestrian improvements prior to the issuance of the final Certificate of Occupancy. (P&Z) (T&ES) \*, \*\*\*
  - a. Construct all concrete sidewalks to City standards. The minimum unobstructed width of newly constructed sidewalks shall be 6 feet, with the exception of connections to existing sidewalks
  - b. Sidewalks must comply with the City's Green Streets and Sidewalks guidance.
27. Provide sidewalks, crosswalks, and curb ramps per the City's Memo to Industry 23-01, Design and Construction Standards, and the City's Complete Streets Design Guidelines. (P&Z) (T&ES) \*, \*\*\*

## **F. PARKING / CURB MANAGEMENT**

28. Provide "Active Loading and Curbside Pick-Up Only" signage on both S. Peyton Street and Commerce Street within 40-feet from the respective entrances. (P&Z)(T&ES)
29. Show all existing and proposed on-street parking controls and restrictions on the Final Site Plan. The Traffic and Parking Board must approve any on-street parking changes after Signature Set. (P&Z)(T&ES)
30. Contribute \$2,500 to the purchase of one multi-space meter on S. Peyton Street. (P&Z) (T&ES) \*\*\*
31. Provide bicycle parking per current Bicycle Parking Standards, available at: [www.alexandriava.gov/bicycleparking](http://www.alexandriava.gov/bicycleparking). (T&ES) \*, \*\*\*
  - a. Include details on the locations and types of bicycle parking prior to Final Site Plan release. Install bicycle parking prior to the issuance of the first Certificate of Occupancy.
32. Provide signage, striping, or other means to direct people to indoor and covered bicycle parking areas within the private property. Show the proposed signage, etc. prior to release of the Final Site Plan and install the signage, etc. prior to issuance of the Final Certificate of Occupancy.

## **G. SUSTAINABILITY**

33. The project shall comply with the requirements of the 2019 City of Alexandria Green Building Policy or subsequently approved policy, at the applicant's option. (OCA) \*, \*\*, \*\*\*, \*\*\*\*
34. The applicant shall provide these items to comply with the Green Building Policy at Final Site Plan: (OCA) \*

- a. Evidence of the project's registration with LEED, Green Globes, EarthCraft, NGBS, or equivalent.
  - b. A copy of the draft certification scorecard which indicates the project will meet the required performance points as outlined in the Green Building Policy for LEED, Green Globes, EarthCraft, NGBS, or equivalent.
35. The applicant shall provide these items to comply with the Green Building Policy with the Building Permit: (OCA) \*\*
  - a. An updated copy of the draft certification scorecard/checklist prior to building permit release for above-grade construction for LEED, Green Globes, EarthCraft, NGBS, or equivalent.
  - b. A draft commissioning plan and verification, if required by the Green Building Rating System and the building code, from a certified third-party reviewer that includes items "i" through "iii" below, prior to receiving building permits for above-grade construction.
    - i. A narrative describing the activities that will be accomplished during each phase of commissioning, including the personnel intended to accomplish each of the activities.
    - ii. A listing of the specific equipment, appliances, or systems to be tested and a description of the tests to be performed, to include, but are not limited to, calibrations and economizer controls, conditions under which the test will be performed. The testing shall affirm winter and summer design conditions and full outside air conditions.
    - iii. Measurable criteria for performance; the plan should match the project's submitted plans and sustainability certification scorecard.
  - c. Water efficiency and indoor environmental quality documentation for the priority performance points in the Green Building Policy prior to building permit release for above-grade construction for LEED, Green Globes, EarthCraft, NGBS, or equivalent.
36. The applicant shall provide these items to comply with the Green Building Policy at with requests for Certificates of Occupancy: (OCA) \*\*\*
  - a. Evidence that design phase credits (for the certifying party) have been submitted by Temporary Certificate of Occupancy for LEED, Green Globes, EarthCraft, NGBS, or equivalent.
  - b. A commissioning report verified by a certified third-party reviewer, including issues log, completed pre-function checklists, and any completed functional performance tests to match scorecard and approved permit plans prior to issuance of the final Certificate of Occupancy.
  - c. Evidence showing that the project meets the priority performance points for Energy Use Reduction, Water Efficiency, and Indoor Environmental Quality for Design Phase credits for LEED, Green Globes, EarthCraft, NGBS, or equivalent.
  - d. If the project fails to achieve the required certification level and priority performance points, then demonstrate a good faith, reasonable, and documented

effort to achieve the certification level to the satisfaction of the Climate Action Officer.

37. The applicant shall provide the following to comply with the Green Building Policy at Release of Performance Bond: (OCA) \*\*\*\*
  - a. Documentation of applicable green building certification showing that the project meets the priority performance points for Energy Use Reduction, Water Efficiency, and Indoor Environmental Quality for LEED, Green Globes, EarthCraft, NGBS, or equivalent.
38. Demonstrate that the roof(s) are solar ready, with the necessary conduit and available electrical panel area to enable future solar panel installation, on the Building Permit. (OCA) \*\*
39. At the Final Site Plan, demonstrate that the building will be fully electric including all mechanical systems. Natural gas back up DOAS and emergency generators are permitted. For limited accessory elements, if using gas, food and beverage uses in retail spaces and outdoor grills, must be controlled with occupancy sensors, timers not to exceed two hours, or other technology to prevent the accessory element from using natural gas when not being used by an occupant of the building. (OCA) \*

## **II. TRANSPORTATION**

### **A. STREETS/TRAFFIC**

40. Repair any of the City's existing public infrastructure that construction damages per the most recent version of the T&ES Design and Construction Standards Memo to Industry 23-01, or to the satisfaction of Director of T&ES, prior to Performance Bond release. (T&ES) \*\*\*\*
41. Provide full curb to curb restoration for any asphalt patches larger than 20 percent of the total asphalt surface, measured along the length of the road adjacent to the property frontage and/or extending to the centerline of the street prior to Performance Bond release. (T&ES) \*\*\*\*

## **III. PUBLIC WORKS**

### **A. WASTEWATER/SANITARY SEWERS**

42. Comply with the Combined Sewer System Management Policy per Memo to Industry 23-02, City of Alexandria's Water Quality Volume Default, and state stormwater quality and quantity requirements. Sanitary flow from the project site will have to be discharged to the combined sewer system (CSS). With respect to the sanitary requirement, the applicant shall contribute \$17880 based on a formula of \$1.5 per gallon of peak sanitary flow (\$1.5 per

gallon x 11,920 gallons) to meet Option B requirements of Memo to Industry 23-02. (T&ES)

## **IV. ENVIRONMENTAL**

### **A. STORMWATER MANAGEMENT**

43. The City of Alexandria's stormwater management regulations for water quality are: (1) state phosphorus removal requirement and (2) Alexandria Water Quality Volume Default. Complying with the state phosphorus reduction requirement does not relieve the applicant from the Alexandria Water Quality Default requirement. Treat the Alexandria Water Quality Volume Default, as determined by the site's post-development impervious area, in a Best Management Practice (BMP) facility. (T&ES) \*
44. Provide a 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 Virginia Runoff Reduction Method (VRMM) worksheet showing project compliance prior to Final Site Plan release. The project must use hydrologic soil group "D" in the spreadsheet unless a soils report from a soil scientist or geotechnical engineer delineates onsite soils otherwise. (T&ES) \*
45. Design all stormwater (BMPs to comply with the most recent standards and specifications published in the Virginia Stormwater BMP Clearinghouse. Provide complete design details for all BMPs, including site specific plan views, cross sections, planting plans, and complete design calculations for each BMP prior to Final Site Plan release. (T&ES) \*
46. Provide a BMP table with a separate listing for each individual BMP that includes the name of the practice, total area treated (acres), pervious area treated (acres), impervious area treated (acres), phosphorous removal efficiency (percentage), phosphorous removal efficiency (percentage), phosphorous removed by the practice (lbs.), and latitude and longitude in decimal degrees, prior to Final Site Plan release. (T&ES) \*
47. All BMP's must be accessible for regular maintenance and inspections. The final building design must include access points and maintenance accessibility for the BMPs. (T&ES) (OCA)
48. Complete construction inspection checklists and associated photographic documentation for each stormwater BMP and detention facility. Submit all documents required by the City of Alexandria As-Built Stormwater Requirements including as-built plans, CAD data, BMP certifications, and completed construction inspection checklists prior to Performance Bond release. (T&ES) \*\*\*\*
49. Construct and install the stormwater BMPs required for this project under the direct supervision of the design professional or their designated representative. Submit a written

certification from the design professional to the Director of T&ES prior to Performance Bond release certifying that the BMPs are: (T&ES) \*\*\*\*

- a. Constructed and installed as designed and in accordance with the released 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.
50. Submit the stormwater quality BMP and/or Stormwater Detention Facilities Maintenance Agreement to include the BMP Schedule and Guidelines Addendum with the Final Site Plan #2. Execute and record the agreement with the Land Records Division of Alexandria Circuit Court prior to Final Site Plan release. (T&ES) \*
51. The Applicant shall be responsible for maintaining stormwater Best Management Practices (BMPs) until activation of the homeowner's association (HOA), and/or master association, if applicable, or until sale to a private owner. Prior to transferring maintenance responsibility for the BMPs to the HOA, master association, and/or owner, the applicant shall: (T&ES) \*\*\*\*
  - a. Execute a maintenance service contract with a qualified private contractor for a minimum of three years, and transfer the contract to the HOA, master association, and/or owner.
  - b. Include a copy of the contract in the BMP Operation and Maintenance Manual.
  - c. Submit a copy of the maintenance contract to T&ES prior to Performance Bond release.
52. Provide the Homeowner's Association (HOA), and/or master association, with an Owner's Operation and Maintenance Manual for all on site BMPs. The manual shall include at a minimum: (T&ES)
  - a. An explanation of the functions and operations of the BMP(s),
  - b. Drawings and diagrams of the BMP(s) and any supporting utilities,
  - c. Catalog cuts on maintenance requirements including any mechanical or electrical equipment,
  - d. Manufacturer contact names and phone numbers,
  - e. A copy of the executed maintenance service contract, and
  - f. A copy of the maintenance agreement with the City.
53. Provide each home purchaser with a brochure describing the stormwater BMP(s) installed on the site, outlining the responsibilities of the homeowners and the Homeowners Association (HOA), and/or master association, with respect to maintenance requirements. Upon activation of the HOA, the applicant shall furnish five copies of the brochure per unit to the HOA for distribution to subsequent homeowners. (T&ES)
54. Provide an Owner's Operation and Maintenance Manual for all BMPs to the owner. The manual shall include at a minimum: (T&ES)

- a. An explanation of the functions and operations of the BMP(s),
- b. Drawings and diagrams of the BMP(s) and any supporting utilities,
- c. Catalog cuts on maintenance requirements including mechanical or electrical equipment,
- d. Manufacturer contact names and phone numbers,
- e. A copy of the executed maintenance service contract, and
- f. A copy of the maintenance agreement with the City.

55. The applicant/owner shall install and maintain stormwater 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 BMPs on the project. The manual shall include at a minimum: (T&ES) \*\*\*\*

- a. An explanation of the functions and operations of the BMP(s),
- b. Drawings and diagrams of the BMP(s) and any supporting utilities,
- c. Catalog cuts on maintenance requirements including mechanical or electrical equipment; manufacturer contact names, and phone numbers,
- d. A copy of the executed maintenance service contract, and
- e. A copy of the maintenance agreement with the City. Include a copy of the contract in the BMP Operation and Maintenance Manual. Submit a copy of the maintenance agreement to the City prior to Performance Bond release.

56. Submit a copy of the Operation and Maintenance Manual to the T&ES Stormwater Management Division prior to Performance Bond release. (T&ES) \*\*\*\*

57. Submit a certification by a qualified professional that any existing stormwater management facilities adjacent to the project and associated conveyance systems were not affected adversely by construction operations prior to Performance Bond release to the satisfaction of the Director of T&ES. If maintenance of the facilities or systems were required to make this certification, describe the maintenance measures performed. (T&ES) \*\*\*\*

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

58. Use standard city markers to mark all on-site stormwater curb inlets and public curb inlets within 50 feet of the property line to the satisfaction of the Director of T&ES. (T&ES)

59. For sites that contain marine clays, account for marine clay or highly erodible soils in the construction methodology and erosion and sediment control measures. (T&ES)

60. Provide Environmental Site Assessment Notes that delineate, map, describe, and/or explain these environmental features (if located on site): (T&ES)

- a. Individual components of the RPA as well as the total geographic extent of the RPA, to include the appropriate buffer, intermittent streams, and associated buffers,
- b. Highly erodible and highly permeable soils,
- c. Steep slopes greater than 15 percent in grade,
- d. Known areas of contamination; springs, seeps, or related features, and

- e. A listing of all wetlands permits required by law.

## C. CONTAMINATED LAND

61. Indicate on the site plan whether any soil and groundwater contamination are present. Submit supporting reports for associated environmental investigations or assessments performed to substantiate this determination. (T&ES) \*
62. If environmental site assessments or investigations discover the presence of contamination on site, the Final Site Plan shall not be released, and no construction activity shall occur until these items have been submitted and approved by the Director of T&ES: (T&ES) \*
  - a. 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. A Risk Assessment indicating any risks associated with the contamination.
  - c. A Remediation Plan detailing any contaminated soil and/or groundwater, including plans to remediate utility corridors. Utility corridors in contaminated soil shall be over excavated by two feet and backfilled with “clean” soil. Describe the environmentally sound methods of off-site transport and disposal of contaminated soils and debris (including but not limited to types of vehicles appropriate for handling specific materials and ensuring vehicle loads are covered).
  - d. A Health and Safety Plan with measures to take during remediation and/or construction activities to minimize the potential risks to workers, the neighborhood, and the environment. Initial Air Monitoring may be required during site activities to demonstrate acceptable levels of volatiles and/or airborne particles. Justify the air monitoring determination in the Health and Safety Plan submitted for review.
  - e. Screen for PCBs as part of the site characterization if any of the past uses are within the identified high risk category sites for potential sources of residual PCBs, which includes these SICs: 26&27 (Paper and Allied Products), 30 (Rubber and Misc. Plastics), 33 (Primary Metal Industries), 34 (Fabricated Metal Products), 37 (Transportation Equipment), 49 (Electrical, Gas, and Sanitary Services), 5093 (Scrap Metal Recycling), and 1221 and 1222 (Bituminous Coal).
63. Should any unanticipated contamination, underground storage tanks, drums or containers be encountered at the site during construction, the applicant must notify T&ES, Development Site Inspector and Office of Environmental Quality and the Fire Marshall’s Office immediately. Should unanticipated conditions warrant, stop construction within the affected area until the appropriate environmental reports identified in “a” through “e” above are submitted and approved at the discretion of the Director of T&ES. Include the preceding text as a note on the Final Site Plan. (T&ES) (Code) (Fire) \*
64. If warranted by a Site Characterization report, design and install a vapor barrier and ventilation system for buildings and parking areas to prevent the migration or accumulation of methane or other gases or conduct a study and provide a report signed by a professional engineer showing that such measures are not required to the satisfaction of Directors of T&ES and Code Administration. The vapor barrier and ventilation system must include a

passive ventilation system that can be converted to an active ventilation system if warranted. If a vapor barrier and ventilation system is required, the schematic shall be signed by a professional engineer and included in the Final Site Plan. (T&ES) (Code) \*

65. If a Soils Management Plan is required by the Site Characterization report, then the plan shall be included in the Final Site Plan. (T&ES) \*

#### **D. NOISE**

66. Upon completion of the project, the applicant shall take as-built, noise readings in the interior of the Duke Street facing units using the noise measurement criteria identified in the HUD standards. If the interior noise readings during the heaviest traffic conditions do not meet the HUD Standard of 45dB or less, a disclosure shall be added to each tenant's rental agreement for those units stating that the unit did not meet HUD standards for interior noise. The applicant shall provide a certified noise reading prior to approval of the Certificate of Occupancy. (P&Z)(T&ES)

#### **E. AIR POLLUTION**

67. Control odors and any other air pollution sources resulting from construction or commercial operations at the site and prevent them from leaving the property or becoming a nuisance to neighboring properties, as determined by the Director of T&ES. (T&ES).

### **V. CONSTRUCTION MANAGEMENT**

68. Submit a separate construction management plan to the Directors of P&Z, T&ES, and Code Administration prior to Final Site Plan release. The plan shall satisfy these requirements: (P&Z) (T&ES) (Code)
  - a. Do not remove streetlights without authorization from the City of Alexandria,
  - b. If streetlights are to be removed from the public right-of-way, then provide temporary lights until the installation and commissioning of new lights, \*
  - c. Include an analysis as to whether temporary street or site lighting is needed for safety during the construction on the site and how it is to be installed, \*
  - d. Provide a detailed sequence of demolition and construction of improvements in the public right of way along with an overall proposed schedule for demolition and construction, \*
  - e. Include an overall proposed schedule for construction, \*
  - f. Include a plan for temporary pedestrian circulation, \*
  - g. Include the location and size of proposed construction trailers, if any, \*
  - h. Include a preliminary Maintenance of Traffic Plan as part of the construction management plan for informational purposes only, to include proposed controls for traffic movement, lane closures, construction entrances and storage of materials, and \*
  - i. Post copies of the plan in the construction trailer and give it to each subcontractor before they start work. \*\*\*

69. Provide off-street parking for all construction workers without charge and ensure that all workers use this parking. For workers who use Metro, DASH, or another form of mass transit, subsidize a minimum of 50 percent of the fees. Complying with this condition shall be a component of the construction management plan, which shall be submitted prior to Final Site Plan release and approved by the Departments of P&Z and T&ES prior to commencing any construction activities. This plan shall: (P&Z) (T&ES) \*
  - a. Establish and provide verifiable details and/or agreements on 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. Post information on transit schedules and routes, \*
  - c. The community liaison must manage parking actively for all construction workers and ensure compliance with the off-street parking requirement, and
  - d. If the off-street construction worker parking plan is found to be violated during construction, a correction notice will be issued to the applicant. If the violation is not corrected within five days, a "stop work order" will be issued, with construction halted until the violation has been corrected.
70. In the construction management plan, include chapters on: (T&ES) \*
  - a. **Maintaining pedestrian access.** Sidewalks adjacent to the site shall remain open during construction. If sidewalks must be closed, pedestrian access shall be maintained adjacent to the site per Memo to Industry 04-18 throughout the construction of the project.
  - b. **Maintaining bicycle access.** Bicycle facilities adjacent to the site shall remain open during construction. If a bicycle facility must be closed, bicycle access shall be maintained adjacent to the site per Memo to Industry 04-18 throughout the construction of the project.
  - c. **Maintaining access to transit stops.** Stops shall remain open to the extent feasible for the duration of construction. If construction requires closing a stop, then install a temporary ADA accessible stop. Coordinate with the T&ES Transportation Planning Division at 703.746.4088 as well as the transit agency serving the stop. Install signs noting the closure and the location of the temporary stop prior to ending service at the current stop.
  - d. **Waste control program.** This program shall control waste (e.g., discarded building materials, concrete truck washout, chemicals, litter or trash, sanitary waste) and prevent offsite migration that may cause adverse impacts to neighboring properties or to the environment. Dispose of all waste offsite per all applicable federal, state, and local laws. Provide documentation as required per the City's Green Building Policy and conditions therein.
71. Conduct these pre-construction meetings: (P&Z) (T&ES) (Code) \*, \*\*

- a. Walk/survey of the site prior to any land disturbing activities with T&ES Construction & Inspection and Code Administration staff to document existing conditions prior to Final Site Plan release.
- b. An in-person or virtual meeting to review the location of construction worker parking, plan for temporary pedestrian and vehicular circulation, and hours and overall schedule for construction prior to commencing demolition, clearing, and grading of the site. Notice all adjoining property owners, civic associations, and the Departments of P&Z and T&ES at least 14 calendar days before the meeting. Hold the meeting before any building or grading permits are issued.
- c. An in-person or virtual pre-installation/construction meeting to review the scope of landscaping installation procedures and processes with the P&Z project planner prior to starting work.

72. Identify these individuals prior to Final Site Plan release: (P&Z) (T&ES) \*

- a. Certified Land Disturber (CLD) in a letter to the Division Chief of Permits & Inspections prior to any land disturbing activities and include the name on the Phase I Erosion and Sediment Control sheets. If the CLD changes during the project, then note the change in a letter to the Division Chief.
- b. Community liaison for the duration of the project. Provide their name and telephone number, including an emergency contact number, to residents, property managers, and business owners whose property abuts the site. Install a temporary informational sign prior to Final Site Plan release with the community liaison's name and contact information. Display the sign until construction finishes.

73. Submit a stamped electronic copy of a wall check survey completed by a licensed, certified public land surveyor or professional engineer when below-grade construction reaches the proposed finished grade. Ensure the wall check shows: (P&Z) \*\*

- a. Key dimensions of the building as shown on the approved Final Site Plan,
- b. Key dimensions from the future face of finished wall above to the property line and any adjacent structures on the property,
- c. Extent of any below-grade structures,
- d. Foundation wall in place, and
- e. Future face of finished wall above.

74. Submit a stamped electronic copy of an as-built development site plan survey, per the *As-Built Development Site Plan Survey Checklist* prior to applying for a Certificate of Occupancy permit. A registered architect, engineer, or surveyor shall prepare the as-built plan. (P&Z) (T&ES) \*\*\*

75. If outstanding performance, completion, or other bonds for the benefit of the City are 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 and associated documents 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) \*\*\*

## **VI. CONTRIBUTIONS**

76. Contribute \$27,337 to the City's Housing Trust Fund prior to receipt of a Certificate of Occupancy. Make all payments to the City of Alexandria and submit them to the Office of Housing with a cover letter to include the project name, case number, and explanation of the contribution amount, if phased. (Housing) \*\*\*
77. Provide a monetary contribution, in the amounts specified within the Landscape Guidelines, to the City of Alexandria's Urban Forestry Fund to account for a modification in meeting the minimum crown coverage requirement. Provide the contribution prior to issuance of the first Certificate of Occupancy. Payment shall be payable to the City of Alexandria, with a transmittal letter addressed to RP&CA citing the project name and case number, contribution amount, and the condition being fulfilled. (P&Z) (RP&CA) \*\*\*

## **VII. PUBLIC ART**

78. Work with City Staff to incorporate on-site public art elements or provide an equivalent monetary contribution for public art within the Small Area Plan per the City's Public Art Policy, adopted December 13, 2014, to the satisfaction of the Directors of P&Z and RP&CA. (P&Z) (RP&CA)
79. Identify the location, type, and goals for public art in the Final Site Plan. Select the artist, finalize locations and medium, and provide a schedule for the art installation prior to Final Site Plan release. (P&Z) (RP&CA) \*
80. Install the art prior to issuance of the first Certificate of Occupancy, to the satisfaction of the Directors of P&Z and/or RP&CA. (P&Z) (RP&CA) \*\*\*
81. The in-lieu contribution shall be \$0.30 per gross square foot, with a maximum contribution of \$75,000 per building prior to issuance of the first Certificate of Occupancy. On-site public art shall be of equivalent value to the contribution. (P&Z) (RP&CA) \*\*\*

## **VIII. USES**

82. Provide this condition for any future retail tenants, to the satisfaction of the Director of P&Z: (P&Z)
  - a. All ground floor windows shall remain transparent, except as otherwise allowed by the Zoning Ordinance per § 5-511. Do not block windows with walls, film, storage cabinets, shelving, boxes, coat racks, storage bins, closets, or similar. Retailers may have display cases that face the street.
83. The applicant/owner may designate a limited number of apartments for short-term rentals, as defined by §3-2-141 of the Code of Ordinances, provided that the number of short-term

rental apartments or individuals renting those apartments does not meet the definition of a hotel per §2-161 of the Zoning Ordinance, which would require a change of use application. (P&Z)

**Asterisks denote:**

- \* Condition must be fulfilled prior to release of the Final Site Plan
- \*\* Condition must be fulfilled prior to the release of the building permit
- \*\*\* Condition must be fulfilled prior to the issuance of the Certificate of Occupancy
- \*\*\*\* Condition must be fulfilled prior to release of the bond



## APPLICATION

### DEVELOPMENT SPECIAL USE PERMIT with SITE PLAN

DSUP # \_\_\_\_\_ Project Name: 220 South Peyton Street \_\_\_\_\_

**PROPERTY LOCATION:** 220 and 224 S. Peyton Street

**TAX MAP REFERENCE:** 072.02-05-12 and -13 **ZONE:** CD

**APPLICANT:**

Name: Windmill Hill LLC

Address: [REDACTED]

**PROPERTY OWNER:**

Name: Same as Applicant

Address: [REDACTED]

**SUMMARY OF PROPOSAL** Request to permit the development of a mixed-use building containing eight (8) multi-unit residential dwellings, ground floor commercial space and associated site improvements.

**MODIFICATIONS REQUESTED** Side yard setback, open space, and crown coverage requirements.

**SUP's REQUESTED** Increase in commercial FAR and reduction of required parking spaces

**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.

Windmill Hill LLC By: Lauren G. Riley Attorney/Agent

Print Name of Applicant or Agent

Signature

Mailing/Street Address

Telephone #

Fax #

City and State

Zip Code

Email address

October 8, 2025

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: \_\_\_\_\_

Development SUP # \_\_\_\_\_

**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 three percent.

See attached.

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. **N/A**
- 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 three 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. Windmill Hill LLC	[REDACTED]	See attachment
2.		
3.		

**2. Property.** State the name, address and percent of ownership of any person or entity owning an interest in the property located at 220 & 224 S. Peyton Street, Alexandria, VA 22314 (address), unless the entity is a corporation or partnership, in which case identify each owner of more than three 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. Windmill Hill LLC	[REDACTED]	See attachment
2.		
3.		

**3. Business or Financial Relationships.** Each person or entity listed above (1 and 2), with an ownership interest in the applicant or in the subject property is required 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.

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. Windmill Hill LLC	None	None
2.		
3.		

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.

10/8/2025

Windmill Hill LLC By: Lauren G. Riley Attorney/Agent

Date

Printed Name

*Lauren Riley*

Signature

Development SUP # \_\_\_\_\_

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.)

See attached.

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

Specify time period (i.e., day, hour, or shift).

N/A

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

Specify time period (i.e. day, hour, or shift).

4-5 employees

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

Day	Hours	Day	Hours
Commercial: Monday-Friday	7am-6pm		
Residential: 7 days/week	24 hours/day		

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

A. Describe the noise levels anticipated from all mechanical equipment and patrons.

N/A

B. How will the noise from patrons be controlled?

N/A

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

No odors anticipated. Trash will be located internal to the building.

**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 trash generated from office and residential uses.

B. How much trash and garbage will be generated by the use?

Typical trash generated from office and residential uses.

C. How often will trash be collected?

1-2 times a week

D. How will you prevent littering on the property, streets and nearby properties?

N/A

**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:

**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:

Typical household cleaning products.

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

Access to the property will be secure.

**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?

7 spaces

B. How many parking spaces of each type are provided for the proposed use:

0 Standard spaces

0 Compact spaces

0 Handicapped accessible spaces

0 Other

C. Where is required parking located? (check one)  **on-site**  **off-site** N/A

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

0 parking spaces proposed

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? 0

B. How many loading spaces are available for the use? 0

C. Where are off-street loading facilities located? Existing loading area along Commerce 

D. During what hours of the day do you expect loading/unloading operations to occur?  
Between 7:00 a.m. and 11:00 p.m.

E. How frequently are loading/unloading operations expected to occur, per day or per week, as appropriate?  
As often as needed.

**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.



# APPLICATION - SUPPLEMENTAL

## PARKING REDUCTION

***Supplemental information to be completed by applicants requesting special use permit approval of a reduction in the required parking pursuant to section 8-100(A)(4) or (5).***

**1. Describe the requested parking reduction.** (e.g. number of spaces, stacked parking, size, off-site location)

The Applicant requests a SUP for a parking reduction from the required 7 parking spaces to 0 parking spaces.

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**2. Provide a statement of justification for the proposed parking reduction.**

See attached narrative.

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**3. Why is it not feasible to provide the required parking?**

See attached narrative.

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**4. Will the proposed reduction reduce the number of available parking spaces below the number of existing parking spaces?**

Yes. \_\_\_\_\_  No.

**5. If the requested reduction is for more than five parking spaces, the applicant must submit a **Parking Management Plan** which identifies the location and number of parking spaces both on-site and off-site, the availability of on-street parking, any proposed methods of mitigating negative affects of the parking reduction.**

**See attached narrative, which comprises the Applicant's Parking Management Plan.**

**6. The applicant must also demonstrate that the reduction in parking will not have a negative impact on the surrounding neighborhood.**

**For the reasons set forth in the attached narrative, the reduction in parking will not have a negative impact on the surrounding neighborhood.**

**Narrative Description**  
**220 & 224 S. Peyton Street (TM #073.02-05-12 & -13)**  
**Windmill Hill LLC (the “Applicant”)**

Windmill Hill LLC is (the “Applicant”) is the Owner of property located at 220 & 224 S. Peyton Street. The Property is a triangular-shaped site located in between South Peyton Street and Commerce Street in the Upper King Street neighborhood and contains approximately 4,381 square feet of site area zoned to the CD/Commercial Downtown zone. Currently, the Property is developed with a surface parking lot containing 16 parking spaces. The Property is also located within the boundaries of the King Street Metro and Eisenhower Avenue Small Area Plan and at the edge of the Old and Historic Alexandria District (the “OHAD”). This site is not considered historically significant as there are no structures on the Property and it is surrounded by commercial buildings dating from the 1980s.

The Applicant proposes to redevelop the property with a mixed-use building containing 8 multi-unit dwellings with approximately 5,470 square feet of residential floor area and approximately 2,700 square feet of ground floor commercial floor area.

In order to achieve the proposed development, the Applicant is requests approval of the following; 1) a Development Special Use Permit for a mixed-use building with modifications to allow reduced side yard setbacks, open space, and minimum crown coverage requirements, 2) a Special Use Permit (“SUP”) to increase the commercial floor area ratio pursuant to Section 4-506(B)(1) of the Zoning Ordinance, and 3) a SUP to reduce the number of required residential and commercial parking spaces.

The proposed mixed-use building will contain ground-floor office space accessed from South Peyton Street that opens onto a private patio area at the southern end of the site. The patio will have planters and architectural feature that will further activate the South Peyton Street frontage. The Applicant proposes the residential entrance from Commerce Street, where additional building functions, such as the trash room and bike storage, will be located. All units will have one-bedroom and will have access to either a balcony or outdoor roof deck space. In addition, the proposed project will upgrade the streetscape along South Peyton Street to carry forward the brick sidewalk from the north as well as provide street trees and additional plantings along the building frontage. The Applicant will provide an updated 6-foot concrete sidewalk along the Commerce Street frontage, consistent with the sidewalk to the north.

The Zoning Ordinance requires a minimum of 6 parking spaces for the residential units and a minimum of 1 parking space for the commercial use. Due to site constraints, namely the small size and triangular geometry of the site, it is not feasible for the development to provide either at-grade or below-grade parking. Given the Property’s walkability to neighborhood amenities as well as its close proximity to the King Street Metro Station a quarter mile away and convenient access to other transit modes, including bus, bikeshare, and scooters, the Applicant does not propose any parking on-site. These public transit and office/retail/restaurant opportunities will mitigate impacts

of the proposed parking reduction as this development will attract renters who rely on alternative transportation options (Metrorail, bus, bikeshare, rideshare, etc.) rather than single occupancy vehicles. Additionally, the proposed development will not impact existing on-street parking spaces available and will not have any adverse impacts on the surrounding neighborhood.

As mentioned above, the Applicant requests modifications to reduce the minimum side yard setback requirement from 1:3 or 25 feet to 0 feet, the minimum open space requirement from 35% to 21.2%, and the minimum crown coverage requirement from 25% to 13%. Given the Property's small size and the geometry of the site, it is not feasible to provide the minimum requirements for these elements. Additionally, the proposed side yard setbacks are consistent with the existing buildings to the north. The Applicant is also able to provide 930 square feet of open space on the site with the ground level patio area and upper-level roof decks, ensuring tenants and residents have access to outdoor open space. Further, the Applicant will provide 570 square feet of crown coverage on the site with trees and shrubs located along South Peyton Street. This percentage does not include the provision of 5 new street trees along South Peyton Street. Together, the proposed modifications are reasonable reductions consistent with existing development in the surrounding neighborhood.

In summary, the proposed redevelopment of the surface parking lot to a mixed-use building will enhance the surrounding neighborhood and bring quality residential and commercial uses to an active and vibrant neighborhood.

Windmill Hill LLC



Paul Stoddard  
301 King Street  
City Hall, Room 2100  
Alexandria, Virginia 22314

Re: Authorization to File Application for a Development Special Use Permit,  
Certificate of Appropriateness, and Related Requests  
220 and 224 S. Peyton Street, Tax Map ID 073.02-05-12 and 073.02-05-13 (the  
“Property”)

Dear Mr. Stoddard:

Windmill Hill LLC, as the owner of the above-referenced Property, hereby authorizes Walsh, Colucci, Lubeley & Walsh, P.C. to act as agent on its behalf for the filing and representation of a Development Special Use Permit, Certificate of Appropriateness, and any related applications or requests for the Property.

Very truly yours,

Windmill Hill LLC

By: James Michael Dameron

Its: Managing Member

Date: \_\_\_\_\_

A handwritten signature in black ink, appearing to read "James Michael Dameron".

### **Ownership & Disclosure Attachment**

Title Owner of 220 and 224 S Peyton Street (Tax Map ID 073.02-05-12 and 073.02-05-13)

Windmill Hill LLC  
[REDACTED]

<b>Member</b>	<b>Percent Ownership</b>
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James Michael Dameron	50%
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[REDACTED]	50%
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**Note:** None of the entities or individuals listed above have any business or financial relationship as defined by Section 11-350 of the Zoning Ordinance

**220 & 224 S. Peyton Street  
Affordable Housing Plan  
October 8, 2025**

1.1 Project name and address

- **220 & 224 S. Peyton Street**

1.2 Application number(s)

- **To be determined**

1.3 Brief description of the application and the proposed development program

**The Applicant proposes to construct a mixed-use building containing eight (8) multi-unit dwellings and 2,700 square feet of ground floor commercial space.**

1.4 Requested zoning changes or waivers (if any)

- **A Development Special Use Permit with Preliminary Site Plan.**
- **A Special Use Permit for a parking reduction.**
- **A Special Use Permit for increase in commercial FAR.**
- **Modification of side yard setback.**
- **Modification of open space minimum requirement.**
- **Modification of to the minimum crown coverage requirement.**

1.5 The Small Area Plan in which the project is located and a brief discussion of how relevant affordable housing goals and recommendations are being addressed by the AHP

**The project is located within the King Street Metro and Eisenhower Avenue Small Area Plan. The proposed mixed-use is in furtherance of the City's housing goals by generating additional units proximate to Metro.**

2. Description of the AHP to include:

2.1 Number, type (rental/for-sale), size (number of bedrooms), level of affordability (% of Area Median Income), and length of affordability of proposed affordable units

**N/A**

2.2 General description of location of affordable units in the project

**N/A**

2.3 Confirmation that residents of affordable units will have equal access to all amenities available to residents of market-rate units

**N/A**

2.4 Number, type (rental/for-sale), size (number of bedrooms), level of affordability (% of Area Median Income), and length of affordability of existing affordable units being demolished as part of redevelopment (if any)

**No affordable units are being demolished as part of this redevelopment. The proposed residential FAR of 1.25 is permitted by-right in the CD/Commercial Downtown zone and the Applicant will be making a voluntary contribution.**

2.5 Brief discussion of tenant relocation plan approved by the Landlord-Tenant Relations Board (if applicable)

**N/A**

2.6 Description of the phasing of the project and any implications it may have on the delivery of units (if any)

**The mixed-use building will be constructed in a single phase. All units will be delivered at the same time.**

2.7 Description of any voluntary contributions to be made to the Housing Trust Fund in addition to the provision of affordable units (if any)

**The voluntary contribution based on the base residential density is \$27,170.00.**

2.8 Any other information the applicant deems relevant to the AHP

**N/A**

# Windmill Hill, LLC

## Peyton Street Project

### A. General Approach

1. **National Green Building Standard 2020 New Homes** (10/27/2025) Draft score card specific to this project is provided. See "Peyton Street" exhibit.
2. **Energy Star version 1.1, multi-family energy strategy:** Windmill Hill, LLC will partner with Energy Star program. Energy Star Homes version multi-family 1.1 represents 25 percent above the current Virginia (2021 VEC) energy code.
3. **Projected Certificates** Provide evidence of each program participation and level of certification.
  - A. **National Green Building Standard Certificate Level Silver** issued once approved by Home Innovation Labs extensive quality assurance.
  - B. **Energy Star V1.** which will show the HERS Index and state the project meets the high standards and checklist of qualification as an Energy Star Certified Home.
  - C. **HERS Certificate** stating savings above a code-built building sleeping units.
  - D. The building shall be third party inspected and certified in accordance with Energy Star.
  - E. The work shall be performed by RESNET Certified Rating Quality Assurance Provider, Certified HERS Rater and Rating field inspectors and Home Innovations NGBS certified verifiers.

### B. Energy

1. Energy model projections are created specifically for the energy efficient and sustainable project design including envelope, exterior cladding, window and door efficiency, overhangs where possible, building colors palette, heating, cooling, lighting, and appliances.

#### A. Massing and Orientation:

- Brick veneer shall be utilized where possible on the exterior envelope – masonry does well with storing collected energy and then slowly releasing the energy.
- The orientations of the buildings are determined by the site plan. The project is an infill development with limited ability to change the orientation due to the City grid layout, streetscape, and existing infrastructure.

#### B. Basic Envelope Attributes:

- Envelope attributes include exterior cladding, window & door efficiency, overhangs where possible, and building color palette.

#### C. Lighting:

- Exterior – High efficiency LED lighting is designed, representing 75 percent reduction in overall cost as compared to incandescent light bulbs. Motion detectors or dusk to dawn technology included. Calculated lumens to properly light areas without installing larger wattage fixtures.
- No up-lighting is installed to meet Dark Sky reference guidance (darksky.org)
- Interior:
  - High efficiency LED lighting throughout. Lighting is not only less expensive to operate, but the lights also only generate a very small amount of heat during operation. This eliminates heat loading from lighting on the house space conditioning system (A/C) system.
  - The efficiency and cost savings do not stop at the cost of using a light bulb. LED lighting is sustainable in terms of length of service. The payback is having a lower cost light, and the savings are extended when the light has a longer service life. LED bulbs continue to evolve with better technology. With newer bulbs the service life is estimated to be 14 years and 100,000 hours of service.

#### D. Plug loads:

Plug loads will be positively impacted by education of the homeowner that will occupy the units. This will include a list of recommendations for occupants that will have an impact on how they use their living space and make a difference in their annual cost of plug-in appliance. Multiple studies demonstrate that an occupant habit affects the proportion of plug load on the total annual cost of purchased energy. A list of recommendations will be provided for each unit to help them manage their usage.

#### 2. Preliminary energy savings estimate:

- Unit HERS Index **52** compared to HERS **100** - 2006 code-built living-unit – projected annual savings of \$623.70 purchased energy – total living units annual savings is **\$4,989.60**
- Unit HERS Index **52** compared to an existing unit HERS **130** projected annual savings of \$891. Total savings with all residential units included are **\$7,128.00**
- The building shall be certified Energy Star multi-family V 1.1 and NGBS Silver certified

#### 3. Renewable Energy Production narrative with output estimates

Windmill Hill, LLC is proposing to make the project solar ready for optional rooftop solar panels to be installed later.

- Project annual purchased power 67,588 kWh, based on an average \$0.14/kWh and an annual electric cost for the project of \$9,800.00 per the energy model
- Five percent offset of annual purchased kWh is 3,380 kWh

#### 4. Commissioning agent

Windmill Hill, LLC shall contract with an approved third-party ACCA certified HVAC commissioning agent to certify each HVAC system has been properly tested to confirm the system is installed per ACCA 310 Quality Assurance standard. The testing includes verifying the system parameters that meet or exceed code compliance, ICC Mechanical code, ASHRAE, SMACNA, manufacturer.

#### 5. Metering strategy narrative

Each unit in the building of shall have separate utility meters.

### C. Water

#### 1. Outdoor water reduction strategy:

- Plantings are limited to drought tolerant plants
- Any sod installed is also drought tolerant with limited coverage

#### 2. Indoor water use savings and strategies:

- Water Sense products
- Low flow toilets
- Low flow aerators
- Low flow shower heads
- Pressure balanced bath and shower diverter valves
- Energy Star dishwasher
- Energy Star washing machine and dryer (installed in each residential unit)
- Instant domestic water heaters (greatly reduce lost hot water) which improve water efficiency and energy savings
- Estimated annual gallons saved for (8) units with above strategies are 20,200 gallons per year (conservative estimate) for a family size of (2)

### D. Indoor Environmental Quality:

1. **Daylighting strategy:** Well-placed fenestration that provides natural daylight and therefore reduces the use of artificial lighting. Fenestration shall be installed with Low-E window shading and efficient u-values for doors and windows. This provides better envelope efficiency while

considering some heat gain by use of fenestration in winter months and low heat gain in the summer months.

## 2. Interior Air Quality (IAQ)

- A. **Selected low or no VOC products:** Our purchasing department actively reviews and selects products that have reduced or no VOC's. This has become much easier with products like carpeting and engineered flooring, reducing the use of carpets, carpet pads, and paint and wall coverings. We also select products which do not require additional coatings. Our approach is sustainable and cost-saving at the same time. These selections shall be reflected in our NGBS standard score card.
- B. **Construction IAQ:** During construction the home heating and cooling system (ducted if applicable) is sealed from containments. Each supply and return duct are sealed during construction and vacuumed out upon completion. The home system is not utilized for temporary heating and cooling.
- C. **IAQ part 2:** All installed heating and cooling systems will have media filters designed to remove very small particulate count. Each filter will be installed with a minimum MERV rating of 6. Each occupant shall be educated on the use of the HVAC system, filter replacement, and filter sourcing on a regular schedule. All of this will be documented as required by Energy Star and points are awarded by the NGBS certification score card.
- D. **Occupant thermal comfort:**  
Third party commissioning of the HVAC ducted systems include air balancing based on an ACCA approved Manual J, D and S.
  - 1. Proper load calculations Manual J
  - 2. ACCA Manual D approved ducted system sizing
  - 3. Properly sized equipment (Manual S) is designed in compliance with the size of the system and ducted distribution system
  - 4. The system is balanced when commissioned
  - 5. The system is commissioned it is installed and functioning according to the manufacturer specifications
  - 6. All of the above shall provide comfort while a tightly constructed envelope that demonstrates efficiency. House as a system is the only way this works
  - 7. Warranty based on ASHRAE 55 comfort standard

# Home Energy Rating Certificate

Projected Report  
Based on Plans

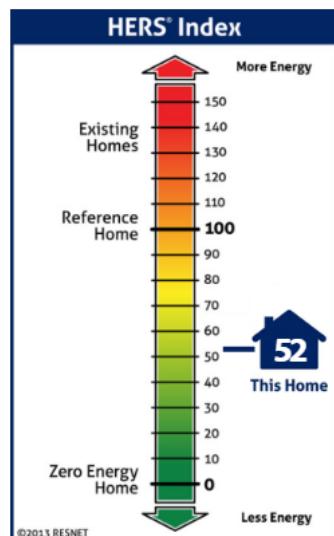
## HERS® Index Score:

# 52

Your home's HERS score is a relative performance score. The lower the number, the more energy efficient the home. To learn more, visit [www.hersindex.com](http://www.hersindex.com)

## Your Home's Estimated Energy Use:

	Use [MBtu]	Annual Cost
Heating	2.7	\$109
Cooling	2.4	\$100
Hot Water	4.4	\$180
Lights/Appliances	8.6	\$351
Service Charges		\$91
Generation (e.g. Solar)	0.0	\$0
<b>Total:</b>	<b>18.0</b>	<b>\$830</b>



Rating Date:  
Registry ID:  
Ekotrope ID: da7gn4g2

## Annual Savings

# \$891

\*Relative to an average U.S. home

**Home:**  
220 S Peyton St  
Unit 7  
Alexandria, VA 22314

**Builder:**  
Windmill Hill, LLC

## This home meets or exceeds the criteria of the following:

ENERGY STAR MF v1.1  
ENERGY STAR MF v1.0  
2021 International Energy Conservation Code  
2018 International Energy Conservation Code

## Rating Completed by:

**Energy Rater:** Steven Hargis  
RESNET ID: 1733242

**Rating Company:** Building Performance Solutions  
1934 Old Gallows Road Ste 350 Vienna VA 22182  
877-831-5061

**Rating Provider:** Building Performance Solutions  
1934 Old Gallows Road Ste 350 Vienna VA 22182  
877-831-5061



Steven Hargis, Certified Energy Rater  
Date: 10/26/25 at 11:10 PM

# ENERGY STAR MF V1.1 Home Report

**Property**  
220 S Peyton St  
Unit 7  
Alexandria, VA 22314

Model: 220 S Peyton St\_Unit 7\_Third Floor  
Community: 220 S Peyton St Apartment

**Organization**  
Building Performance Solutions  
Steven Hargis

**Builder**  
Windmill Hill, LLC

**Inspection Status**  
Results are projected

220 S Peyton St\_Unit 7\_Third Floor

## Mandatory Requirements

- ✓ Duct leakage at post construction better than or equal to applicable requirements.
- ✓ Total building thermal envelope UA meets or exceeds applicable requirements.
- ✓ Envelope insulation achieves RESNET Grade I installation, or uses exceptions in footnote 5.
- ✓ Total window thermal properties meet or exceed the applicable requirements
- ✓ Duct insulation meets the EPA minimum requirements of R-6.
- ✓ Mechanical ventilation system is installed in the home.
- ✓ Measured infiltration is better than or equal to applicable requirements.
- ✓ ENERGY STAR Checklists fully verified and complete.

## ERI (HERS) Index Target

Reference Home ERI (HERS)	59
SAF (Size Adjustment Factor)	1.00
SAF Adjusted ERI (HERS) Target	59

As Designed Home ERI (HERS)	52
As Designed Home ERI (HERS) w/o PV	52

## Normalized, Modified End-Use Loads

### (MBtu / year)

	ENERGY STAR	As Designed
Heating	4.3	3.4
Cooling	2.8	3.3
Water Heating	3.8	3.7
Lights and Appliances	10.1	8.6
<b>Total</b>	<b>21.0</b>	<b>19.0</b>



This home MEETS or EXCEEDS the energy efficiency requirements for designation as an EPA ENERGY STAR Qualified Home under Version Multifamily V1.1

## Pollution Prevented

Type of Emissions	Reduction
Carbon Dioxide (CO <sub>2</sub> ) - tons/yr	0.2

## Energy Cost Savings

Heating	50
Cooling	-5
Water Heating	4
Lights & Appliances	61
<b>Generation Savings</b>	<b>0</b>
<b>Total</b>	<b>110</b>

The energy savings and pollution prevented are calculated by comparing the Rated Home to the ENERGY STAR Version Multifamily V1.1 Reference Home as defined in the ENERGY STAR Qualified Homes ERI (HERS) Target Procedure for National Program Requirements, Version Multifamily V1.1 promulgated by the Environmental Protection Agency (EPA). In accordance with the ANSI/RESNET/ICC 301 Standard, building inputs affecting setpoints infiltration rates, window shading and the existence of mechanical systems may have been changed prior to calculating loads

# Fuel Summary

Property	Organization	Inspection Status
220 S Peyton St	Building Performance Solutions	Results are projected
Unit 7	Steven Hargis	
Alexandria, VA 22314		
Model: 220 S Peyton St_Unit 7_Third Floor		
Community: 220 S Peyton St Apartments		
220 S Peyton St_Unit 7_Third Floor		

## Annual Energy Cost

Electric	\$833
----------	-------

## Annual End-Use Cost

Heating	\$119
Cooling	\$92
Water Heating	\$180
Lights & Appliances	\$351
Onsite Generation	-\$0
Service Charges	\$91
Total	\$833

## Annual End-Use Consumption

Heating [Electric kWh]	849.3
Cooling [Electric kWh]	660.2
Hot Water [Electric kWh]	1,283.9
Lights & Appliances [Electric kWh]	2,506.9
Total [Electric kWh]	5,300.4
Total Onsite Generation [Electric kWh]	0.0

## Peak Electric Consumption

Peak Winter kW	0.95
Peak Summer kW	1.15

## Utility Rates

Electricity	Dominion Energy - Virginia - 1.1.2025
-------------	---------------------------------------

## End Use Energy Costs

**Property**  
220 S Peyton St  
Unit 7  
Alexandria, VA 22314

Model: 220 S Peyton St\_Unit 7\_Third Floor  
Community: 220 S Peyton St Apartment

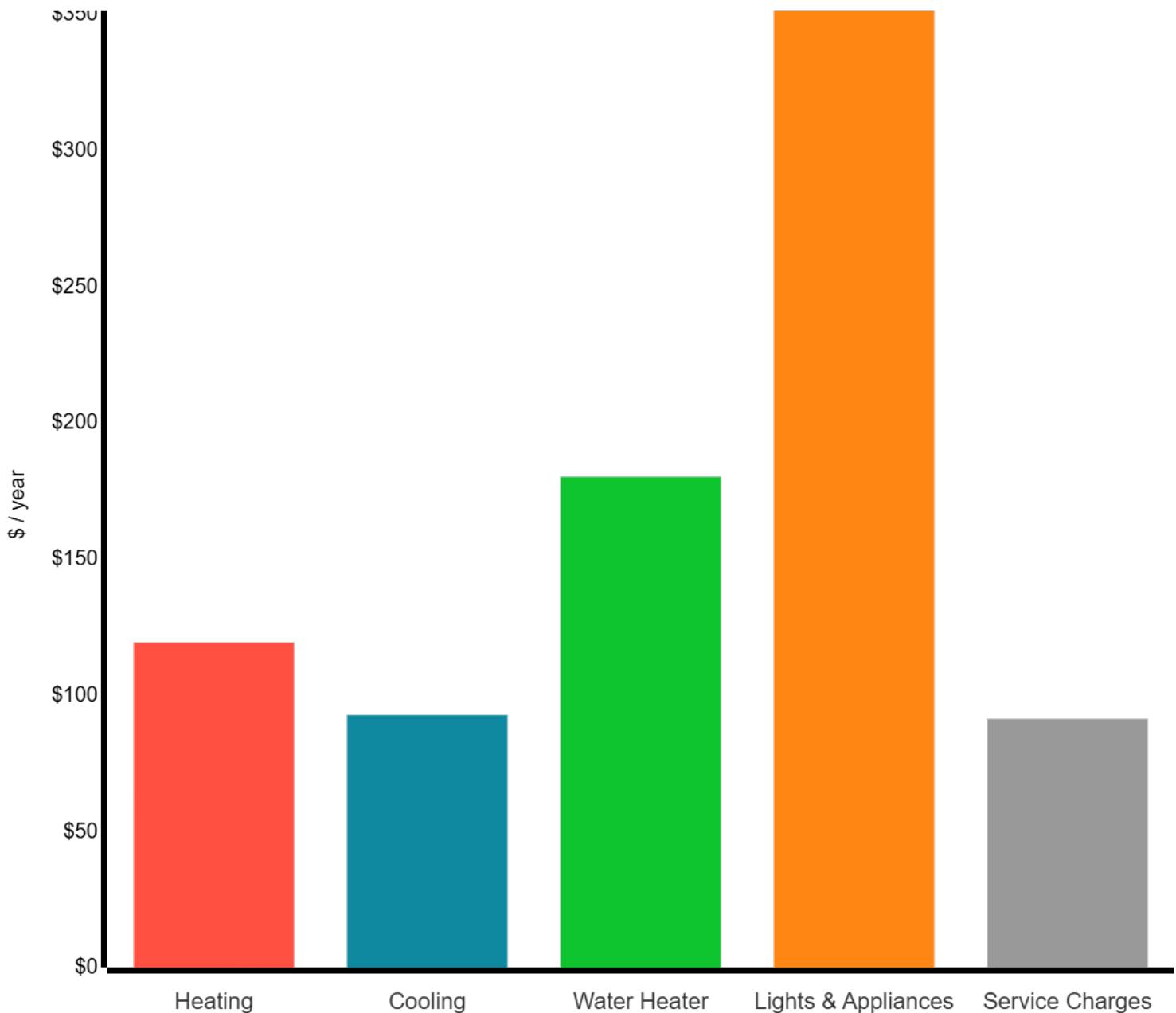
220 S Peyton St\_Unit 7\_Third Floor

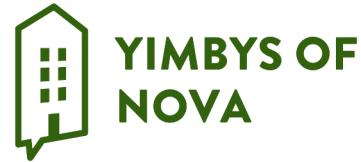
**Organization**  
Building Performance Solutions  
Steven Hargis

**Builder**  
Windmill Hill, LLC

**Inspection Status**  
Results are projected

### Annual Energy Cost





6 January 2026

Members of the Alexandria Planning Commission,

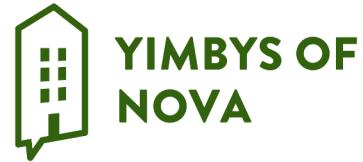
As the Alexandria leadership team for YIMBYs of Northern Virginia, we are excited to see two significant housing developments on today's docket, in addition to three subdivisions and a Zoning Text Amendment that is a step in the right direction towards streamlining the process for office-to-residential conversions, and we ask you to vote yes on all of them. Together, these developments will add 31 desperately needed new homes to Alexandria. Lastly, we'd like to share our perspective on the proposed Green Building Plan.

Docket item 6, 220 and 224 S Peyton Street, will replace a small surface parking lot with eight homes close to the King Street Metro station. The development will also benefit its neighbors with improved sidewalks and new street trees. We would like to note that you are again being asked to approve a parking reduction within a quarter mile of a Metro station in one of our city's most walkable areas. We hope you will legalize parking flexibility to make it easier to build homes like these, in locations where residents have choices in how to get around.

Docket item 7, 732 N Washington and 710 Madison, will convert a 1960s office building in Old Town North to twenty homes. In addition to the fact that a parking reduction is again required for a development within a half mile of a Metro station, we'd like to note that a Special Use Permit is required to build a residential building in the CRMU-X zone. A residential building in a residential zone should not be considered a special use. We hope you will consider removing this requirement, and more broadly, simplifying our zones so that housing is legal everywhere in Alexandria. Lastly, we'd like to comment on the map in the staff report showing that this development will be the sixth height increase to the Old Town North Small Area Plan, which is less than ten years old. We hope this will inform height limits that are appropriate for the housing our city needs in future planning processes, including the Duke Street plan.

Docket item 8, the zoning text amendment, is a step in the right direction towards simplifying the approval process for office-to-residential conversions. We enthusiastically support formalizing staff's interpretation to allow existing noncomplying buildings to convert to residential use. The new SUP process is a step in the right direction towards streamlining the regulatory complexity around office-to-residential conversions. We hope you will approve the proposed amendment, and then make further changes to our zoning code to allow more office-to-residential conversions to be approved by-right rather than requiring City Council approval for an SUP. This could include increasing residential FAR limits to match commercial limits in zones where they are not equal, and exempting office-to-residential conversions from requirements like open space and setbacks that do not apply to the existing office building.

Lastly, we'd like to share our thoughts on Docket Item 9, the proposed Green Building Plan. We unfortunately missed the initial public engagement last year, and we wish we had a clearer understanding of how the cost for building housing compares to the current policy. If the proposed policy will lower the cost of building homes as compared to the current policy in virtually all cases, then



we enthusiastically support it. If there are cases where it would increase the cost of building homes, then we urge caution and consideration of how the cost of important environmental requirements can be offset to ensure projects remain feasible in Alexandria itself. Any policy that aims to make buildings in Alexandria more sustainable must also acknowledge that any multifamily housing building within the City of Alexandria is inherently sustainable compared to the alternative. When a project cannot be built affordably in Alexandria it does not simply stop existing; that demand of housing is instead fulfilled elsewhere. This drives regional housing sprawl, increasing emissions as more people are forced to live in jurisdictions that are both A) more car-reliant and B) do not require projects to be built as sustainably. Reducing "Alexandria's" greenhouse gas emissions by displacing them into Fairfax or Prince William Counties is not a good solution. We are particularly concerned by the projected high costs for multifamily low-rise buildings, which the plan estimates at \$10 per square foot. More care should be given to reducing the costs of or allowing more leeway for this housing type.

In addition to that broader consideration, we suggest two specific changes to the Plan:

- 1) The plan mandates a certain percentage of required parking spaces be compatible for electric vehicles. The plan should instead: A) call for the elimination of parking mandates, since mandating more parking spaces than people actually need is bad for the environment, and B) shift how EV spaces are required by applying the percent to a project's number of *built* parking spaces rather than the *mandated* spaces. This disentangles the Green Building Plan from the current parking mandate policy, and also avoids penalizing developers for seeking a parking reduction.
- 2) The plan exempts buildings "under 25,000 square feet or with 4 or fewer units." By exempting the most inherently costly and least inherently sustainable form of housing (large single-family homes) while layering requirements on the most naturally affordable ones (multifamily, especially low rise), this creates a perverse incentive that will further encourage builders to focus on luxury houses. It is our understanding that all buildings over 3,000 square feet require a DSP, in theory allowing them to be subjected to this plan. Every single family home in Alexandria over 3,000 square feet costs at least \$1 million. It seems fair to apply higher standards to these luxury homes, and balance this by easing restrictions on the most-impacted and more affordable typologies.

We hope Alexandria will continue to welcome new homes of all types, all price points, and in all parts of our city to address our regional housing crisis and make our city better for everyone.

Phoebe Coy, Alex Goyette, Peter Sutherland, Stephanie Elms and Yasir Nagi  
YIMBYs of Northern Virginia Alexandria leads

January 5, 2026

RE: PUBLIC COMMENTS Submitted by 9 property owners and neighbors  
Development Special Use Permit #2025-10030  
220 & 224 South Peyton Street  
Applicant: Windmill Hill LLC. represented by Lauren Riley, Attorney

Dear Alexandria Planning Commission:

We are writing as neighbors and property owners adjacent to the proposed development to offer our comments for the public record. Our intention is to work collaboratively to ensure any new development is a responsible addition to our shared community.

If the Development is approved with a reduction in parking requirements, it must be on the condition that all units in the development are barred from obtaining permits to park on surrounding public streets to prevent overcrowding of neighborhood curb space. This aligns with the Staff Report on Page 12, which notes that staff will bring a proposal to fully exclude this property and its future residents from the District 4 boundaries. We support this as one of the Planning Commission conditions of approval to manage existing parking constraints effectively.

We wish to bring the following material considerations to the Commission's attention, supported by information provided in attached Appendices A, B and C:

### **Community and Safety Considerations**

**Emergency Vehicle Access** – The existing parking lot provides a critical secondary ingress and egress for first responders, functioning as an emergency access passthrough at the end of Commerce Street's long cul-de-sac. Eliminating this access could create a significant safety hazard for all residents in the event of a primary entrance blockage. We kindly request confirmation from Alexandria City staff regarding the status of any potential Emergency Vehicle Easement on this lot, given the existence of drivable curbs on both Peyton and Commerce Streets.

**Fire Apparatus Turnaround Radius** – The Commerce Street cul-de-sac currently lacks the necessary turnaround radius for large emergency apparatus as required by the Virginia Statewide Fire Prevention Code and City of Alexandria Fire Prevention Code. Any development must ensure compliance with these safety standards, as dead-end easements over 100 feet require an approved area for turning around fire apparatus.

### **Parking and Congestion**

**Parking Requirements** – Commerce Street is already a narrow cul-de-sac experiencing heavy congestion from limited existing parking, local business traffic (listed in Appendix C), and the parents driving their children to/from the Blue Bird Day Care and Day School at the end of the cul-de-sac. Granting a reduction in parking requirements for this new development would likely exacerbate these existing congestion issues, impacting the quality of life for current residents.

We offer these comments in a spirit of community safety and responsible planning, and hope the Commission will take them into full consideration.

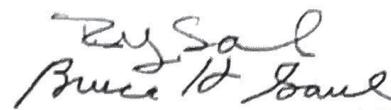
Sincerely,  
Undersigned Neighbors

  
Suzanne Herseth  
Name(s): Andrew & Suzanne Herseth  
Address: 336 Commerce Street

  
Karen S. Griffin  
Name(s): Karen S. Griffin  
Address: 328 Commerce Street

  
Leah Bancheri  
Name(s): Cameron Steele, Leah Bancheri  
Address: 338 Commerce St

Tim & Catherine Kelly  
Name(s): Timothy & Catherine Kelly  
Address: 332 Commerce Street

  
Polly & Bruce Saul  
Name(s): Polly & Bruce Saul  
Address: 330 Commerce Street

Name(s):  
Address:

## APPENDIX A

### Pictures of Area



## APPENDIX B

### Resource List

#### Comment 1:

**2024 NFPA 1141: Standard for Fire Protection Infrastructure for Land Development:** This standard outlines the fundamental requirements for emergency access, including the necessity for secondary access points in developments where a single point of entry could be blocked.

**2021 International Fire Code (IFC) Appendix D:** Provides specific dimensional requirements for fire apparatus access roads, stipulating that dead-end roads exceeding 150 feet must have an approved turnaround and that over-length cul-de-sacs (typically those over 750 feet) require special approval or secondary access.

**FEMA Comprehensive Preparedness Guide (CPG) 101:** Offers guidelines on developing risk-informed emergency operations plans, emphasizing that unimpeded ingress and egress are critical for effective disaster response and evacuation.

**NFPA 1: Fire Code Section 18.2.3.4:** Sets the national baseline for "Access to Structures and Areas," explicitly requiring that fire department access roads be provided for every building to ensure no portion is more than 150 feet from a road.

**OSHA 29 CFR 1910.38:** Governs emergency action plans, highlighting that blocked egress or the removal of designated emergency exits can lead to "deadly consequences" and significant legal liability.

#### Comment 2:

##### **City of Alexandria Fire Prevention Code**

<https://media.alexandriava.gov/docs-archives/localmotion/info/gettingaround/4---roadways-online.pdf>

##### **Virginia Statewide Fire Prevention Code (VSFPC):**

The VSFPC (which incorporates parts of the International Fire Code) focuses on the physical ability of fire apparatus to reach structures and turn around safely.

Turnaround Requirement: Any dead-end fire apparatus access road exceeding 150 feet in length must be provided with an approved turnaround area.

Turnaround Dimensions: Approved cul-de-sac bulbs must generally provide at least a 90-foot diameter to accommodate modern fire trucks.

Access Distance: A road is non-compliant if it does not extend to within 150 feet of all portions of the building's exterior walls, unless the building is fully sprinklered.

## APPENDIX C

### Area businesses that add to traffic on Commerce Street

- 1) LandDesign, Inc. (200 S. Peyton Street)
- 2) APCO International (1426 Prince Street)
- 3) Five businesses at 1420 Prince Street:
  - Austin & Elkins (Suite 101)
  - The Genius Genus & The Unleashed Pet (Suite 102)
  - Shining Light Media,LLC (Suite 200)
  - Gracie's Vision Healthcare (Suite 201)
  - Nails by Masumi (Suite 202)
- 4) Eye Level Alexandria - Tutoring (1414 Prince Street)
- 5) Back to Health Center (1414 Prince Street, Suite 100)
- 6) New Spa Business (333 Commerce Street)

Docket Item #6  
DSUP2025-10030  
January 6, 2026

From: Zack DesJardins  
To: PlanComm  
Subject: [EXTERNAL]Support for DSUP 2025-10030  
Date: Monday, January 5, 2026 11:36:12 PM

---

You don't often get email from zacharydesjardins@gmail.com. [Learn why this is important](#)

Hi Planning Commissioners,

For the past several years, I deliver my kids to daycare adjacent to this property, even occasionally surreptitiously using the parking lot proposed to be removed. I support the project, especially its lack of parking as so few are built this way. Its construction will be a source of interest by many pre-schoolers as well.

For the bicycle parking room, requiring all bicycles to be locked vertically will severely limit the appeal of the room per the statement that "For tenants with bicycles, they will have access to a vertical bike storage room inside the building." Many newer electric bikes are heavy and difficult to lift onto a vertical rack. I have yet to find a vertical rack that allows users to securely lock their bicycles to it. When I worked at an office with a bicycle room with vertical only racks, none were used and instead, all of us bike commuters had to bring our bikes in the elevator to the office itself. It is not clear that the city's required 30% of floor based racks is being followed ([page 7](#)) even though the staff report states that they will comply.

Zack DesJardins

---

**DISCLAIMER:** This message was sent from outside the City of Alexandria email system.  
DO NOT CLICK any links or download attachments unless the contents are from a trusted source.

From: Todd Perry  
To: PlanComm  
Subject: [EXTERNAL]Resident support for docket items 6 and 7 in today's meeting  
Date: Tuesday, January 6, 2026 7:58:05 AM

---

[You don't often get email from toddperry99@gmail.com. Learn why this is important at  
<https://aka.ms/LearnAboutSenderIdentification>]

Good morning,

My name is Todd Perry, and I am a renter in Old Town. I am writing to show my support for docket items 6 and 7 in today's meeting. Our rent is way too high and any additional housing will help stabilize rents long term.

Thank you,

Todd Perry  
Sent from my iPhone

---

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DO NOT CLICK any links or download attachments unless the contents are from a trusted source.

**From:** [Leah Elizabeth Bancheri](#)  
**To:** [PlanComm](#)  
**Subject:** [EXTERNAL]Concern for SUP #2025-10030 From Neighbor  
**Date:** Sunday, January 4, 2026 11:49:18 AM

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You don't often get email from leahbancheri@gmail.com. [Learn why this is important](#)

Good morning—

As a current resident of 338 Commerce Street, Alexandria, VA 22314, a former BAR intern, and a former member of the Beautification Commission, I feel compelled to comment on SUP #2025-10030 for the proposed development on S. Peyton Street.

My primary concern is the lack of two-bedroom units in this proposal. Developments composed almost entirely of small units risk becoming investment properties for the wealthy or de facto short-term rentals rather than long-term homes. Look at the Prince Street Inn for example ([https://maps.app.goo.gl/LCTQNjd5saBnHUXQA?g\\_st=ic](https://maps.app.goo.gl/LCTQNjd5saBnHUXQA?g_st=ic)). I cannot afford to purchase a home on my own street, and I would welcome the opportunity to remain in Alexandria as a homeowner rather than a lifelong lessee. It is disheartening to see continued development approved while residents who are deeply invested in this city are increasingly priced out.

Given the unit mix, it appears likely that this building will function as a short-term rental property. If that is the intended use, it would be more transparent and appropriate for the developer to pursue a hotel proposal rather than housing that does not meaningfully serve Alexandria residents.

Second, while I support public transportation and smart growth, I am concerned that the already limited on-street parking in this area will become even more strained as a result of this development.

To be clear, I want to see this underutilized parking lot redeveloped. However, I also want to see development that is meaningful, honest in its intent, and aligned with the goal of supporting long-term residents—not housing that is effectively a hotel in disguise.

Lastly, while development on this block is good, there is still an abandoned home next to me. 340 Commerce. Would appreciate an update on this....

Thank you for your time and consideration.

Sincerely,  
Leah Bancheri  
Alexandria, VA

---

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source.**