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**WALSH COLUCCI
LUBELEY & WALSH PC**

May 22, 2026

Via Permit Arlington

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

Re: Statement of Justification

Request for Major Site Plan Amendment to Site Plan #429

Applicant: Oak Hills Property Associates, LLC and Nash Street Property Associates, LLC c/o Monday Properties Services, LLC

Property: 1401 Wilson Boulevard & 1400 Key Boulevard (RPC ##16-035-001 and -002)

Dear Ms. Vonhm:

On behalf of the Applicant, please accept the following as a statement of support for a major 4.1 Site Plan amendment to Site Plan #429. As detailed below, the Applicant proposes to modify the existing approval to allow for two multifamily residential buildings with ground floor retail on the Property.

Property Background

The Property comprises two parcels of record which, for purposes of calculating site density for this amendment, contains approximately 92,135 square feet (approximately 2.11 acres) in aggregate. The Property is located south of Key Boulevard, west of N. Nash Street, north of Wilson Boulevard, and east of N. Oak Street within the Rosslyn neighborhood. The Property is improved with two vacant commercial office/retail buildings constructed in 1964. The Property features a substantial, approximately 40-foot topographic drop between its southwest corner and northeast corner.

The Property is zoned to the C-O Rosslyn zoning district pursuant to § 7.16 *et seq.* of the Arlington County Zoning Ordinance (the “Zoning Ordinance”) and is designated as “High” Office-Apartment-Hotel in the Arlington County (the “County”) General Land Use Plan (the “GLUP”).

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Note 15 of the GLUP also designates the Property within the Rosslyn Coordinated Redevelopment District.

The Property is subject to Site Plan #429, which was approved by the County Board on June 14, 2014 concurrent with a rezoning and related building encroachments. These approvals, collectively, permit construction of two mixed-use buildings at a 10.0 floor area ratio (“FAR”) separated by ground level and elevated open space. Site Plan #429 includes a 24-story commercial tower with 513,004 square feet of gross floor area (“GFA”), inclusive of 11,131 square feet of retail GFA, as well as a 28-story, 274-unit multifamily building with 44,409 square feet of retail GFA.

Site Plan #429 also permits construction of six levels of below-grade parking containing 816 total vehicle parking spaces and 161 bicycle parking spaces. As originally approved, the project was to be constructed in one or two phases. Site Plan #429 has been amended numerous times. Most recently, on June 18, 2025, the County Board amended Site Plan #429 to extend the period of validity to June 30, 2028 concurrently with the reenactment of the encroachments.

Rosslyn Sector Plan

The Property is subject to the recommendations of the Rosslyn Sector Plan (the “Sector Plan”). The Sector Plan’s “Vision Principles” and “Goals and Policies” set forth land use guidance for redevelopment within the Rosslyn Coordinated Redevelopment District, including recommendations that new development be comprised of a minimum of 30 percent residential uses, and that attractive retail destinations be provided to enhance community vibrancy and diversity.

The Sector Plan recommends the Property be redeveloped with two towers up to a maximum height of 300 feet (exclusive of a mechanical penthouse), separated by park and plaza spaces, at a development intensity of up to a 10.0 FAR. The Sector Plan further classifies the Property’s northwestern frontage as a “Neighborhood Edge” opposite the Colonial Terrace neighborhood, and recommends the any redevelopment should consider step-backs to achieve sensitive transitions and retain viewshed opportunities.

The Sector Plan incorporates the Arlington County Retail Plan’s (the “Retail Plan”) guidance for the Property. The Property’s North Oak Street frontage (below the future 18th Street Corridor) and Wilson Boulevard frontage are designated “Red,” while the remainder of the Property’s street frontages, including 18th Street, are designated “Blue” and “Gold.”

It is noted that the 2011 approval of Site Plan #429 predated the 2015 adoption of the Sector Plan. Accordingly, some of the Sector Plan’s site-specific guidance for the Property simply incorporates design elements of the approved 2014 zoning entitlements. Some of these elements (e.g., the Upper Garden/Oak and Key Plaza) were not subject to a detailed planning analysis associated with the Realize Rosslyn efforts leading up to the Sector Plan’s adoption.

Proposal

Since its original approval 11 years ago, construction of Site Plan #429 has not commenced due to the decline in office demand and market realities in a post-pandemic environment. For nearly four years, the Applicant has worked with its design professionals to create a new vision for the Property that will meet the needs of Rosslyn residents, respond to retail market demands, and satisfy more recently-approved County policies. It has also conducted detailed geotechnical borings and analyses which determined precise location of significant dense bedrock below the Property. This bedrock substantially impacts the construction of the below grade parking structure as currently approved.

Recognizing the Property's location in a transit-rich neighborhood, as well as considering the significant need to increase the supply of housing in the County, the Applicant proposes to amend Site Plan #429 to redevelop the Property with two 27-story multifamily residential buildings.

The buildings would contain approximately 916,140 square feet of GFA (9.94 FAR) in aggregate, inclusive of 887,232 square feet of residential GFA and 831 residential units, as well as 28,908 square feet of ground-floor retail GFA. The two proposed towers would sit atop a five-level partially below-grade parking garage and public space podium and are more particularly described as follows:

- **Key Tower**: The 300-foot tall northern building (the "Key Tower"), located at the corner of Key Boulevard and N. Nash Street, will contain approximately 415,545 square feet of residential GFA (325 units) and an approximately 17,004-square foot ground floor grocery store along the 18th Street Corridor. The main lobby for the Key Tower will be prominently located at the corner of Key Boulevard and N. Nash Street.
- **Wilson Tower**: The 300-foot tall southern building (the "Wilson Tower"), located at the corner of Wilson Boulevard and N. Oak Street, would contain approximately 471,687 square feet of residential GFA (506 units) and 11,904 square feet of ground floor retail GFA. The main lobby for the Wilson Tower will be located along N. Oak Street, with a secondary entrance located along the open space amenity area along N. Nash Street.

The two towers are generally located within the same location of the previously approved Site Plan #429, and are of a similar height as their 2011 counterparts but feature smaller footprints and more slender profiles. This proposed design allows for a larger separation of the two towers at the 18th Street Corridor; from the originally approved separation of approximately 43 feet to approximately 64 feet (as currently proposed). The redesign also allows for wider pedestrian public space and vistas along Wilson Boulevard and N. Oak Street; from the originally approved design the north to south viewshed now has a 39 foot wide viewshed compared to the 24 foot north to south viewshed approved in the original designs. This redesign affords residents and visitors more generous ground level open spaces and better opportunities to experience Rosslyn from

different vantage points (e.g., from the ground plane levels, the mezzanine overlooks, and building rooftops).

The proposed towers will serve as iconic architectural features for Rosslyn's western skyline and will include high-quality materials predominantly comprised of smooth and ribbed architectural precast and/or metal paneling, glass store fronts, punched windows, and window walls. Both buildings will feature soaring rooftop parapets which also serve as an architectural feature for the Rosslyn skyline, rising to their full height to the north.

To emphasize outdoor living and connections between interior and exterior spaces, a high proportion of the residential units will feature private, formally articulated outdoor balconies of varying sizes. The rooftops of both towers will include private amenities and exterior swimming pools, as well as screened mechanical equipment. The Key Tower also steps back significantly at its third level to allow for an amenity terrace above the grocery store roof (described further below) to provide additional programmable outdoor space for the building residents.

While the Applicant is not seeking bonus density under the Green Building Incentive Program ("GBIP"), the proposed building will achieve many of the GBIP's baseline prerequisites to align with the goals and objectives of the Community Energy Plan

Retail Elements

In accordance with the Retail Plan and Sector Plan guidance, active sidewalk-level retail spaces are proposed along N. Oak Street, wrapping around onto Wilson Boulevard. Adjacent residential amenity spaces will enhance the pedestrian experience by activating these public areas and will contribute to a greater sense of safety on surrounding streets.

As a critical element of the project's retail strategy, the Applicant is carrying forward its prior grocery store commitment to serve as a community anchor and an economic driver for Rosslyn and for the project. The delivery of a physical grocer will satisfy the recommendations contained in the Retail Plan and County Board's Grocery Store Policy, and will also deliver on a long-anticipated amenity to provide Rosslyn's growing population direct, walkable access to quality food and essential goods.

The Applicant has invested considerable time and resources in evaluating ways to secure a national credit grocery operator. It has tracked trends and changing grocery store dynamics, including increased competition, oversaturation, automation, and on-demand grocery delivery. It has also held detailed meetings and discussions with local and national retail brokers, leasing experts, and prospective tenants regarding market thresholds, size and spatial design requirements, patron safety and ease of access, product logistics and locational criteria.

To best ensure the viability of a grocery tenant, the grocery store is proposed to be shifted from its prior 2011 location on Key Boulevard (below the previously-approved Upper Garden element) to a location immediately adjacent to the 18th Street Corridor at the base of the Key

Tower. This improved setting will not only provide greater direct visibility to Wilson Boulevard, but will center the grocery store at the confluence of the project's key pedestrian zones. The location will encourage casual use and activation of the 18th Street Corridor and anchor N. Oak Street as a strong pedestrian-friendly retail corridor.

Open Space Elements

A concerted effort has been made, and resources expended, in designing meaningful public and private open spaces that will attract and engage with visitors, provide opportunities for socialization and interaction, as well as expand upon the Sector Plan's recommendations and the 2011 approval. When these open spaces are taken together, the proposed project results in more open space (approximately 47,976 square feet/52 percent of the Property's site area), and more publicly-accessible open space (approximately 14,541 square feet/16 percent of the site area), than comparable Rosslyn projects.

This revised proposal retains the previously-approved 18th Street Corridor as the project's primary open space element. The 18th Street Corridor will reconnect the blocks, unify the site's various elements, offer a visual gateway to central Rosslyn, and establish a direct pedestrian link between North Oak Street and North Nash Street. The reduction in the Wilson Tower's footprint will result in a significant increase in separation between the two towers at the ground level to approximately 70 feet in width (compared to approximately 43 feet in width previously).

The proposed programmatic elements of the 18th Street Corridor reflect a fresh and vibrant approach to placemaking, incorporating best practices in urban design. The ground level landscapes will feature a series of overlooks, porches, planters, and bio-retention facilities that, together, help navigate the approximately 40 feet of grade change through the Property, culminating at the 18th street corridor monumental stair and plaza.

Additional elements include an amenity lawn panel, biophilic elements, vertical green screen walls, specialty paving, potential public art, and thoughtfully integrated seating areas. Additionally, an approximately 7,735-square-foot plaza between the Wilson Tower and the grocery store will provide a flexible space for outdoor dining and casual community programming.

Access to the 18th Street Corridor has been significantly refined from what was approved previously. A winding monumental staircase punctuated by generous intermediate landings, as well as a public elevator at the Key Tower, will provide pedestrian access from the 18th Street Corridor to N. Nash Street and ensure accessibility/mobility for all pedestrians. A midblock crossing on North Nash Street will also be introduced, aligned with the Ames Center project to the east.

The proposal improves upon the prior "Lower Garden" concept by eliminating the Wilson Tower's previously-approved recessed colonnade/arcade. This design modification, coupled with removal of the N. Nash Street slip lane (discussed below), provides an opportunity to recapture space for a second public terrace at the southeast corner of the Property as well as a clear visual

connection to the 18th Street Corridor. This new terrace will include landscaping, elevated seating elements, opportunities for potential public art, and a continuous, accessible pedestrian connection to the 18th Street Corridor.

A third major open space element, an approximately 12,170-square foot elevated private amenity terrace, is proposed above the grocery store. This terrace will include landscaping/hardscape elements, grilling stations, and recreation areas for building residents and visitors. While private and elevated, the terrace addresses the Sector Plan's recommendation for a sensitive edge transition at the northwest corner of the Property, and will help maintain view corridors between two blocks.

Transportation

The Applicant will provide streetscape and landscape improvements along all site frontages in a manner that complies with the Sector Plan's guidance, Core of Rosslyn recommendations, and the Rosslyn Streetscape Elements Plan. This includes meeting recommended build-to lines as well as installing 18-foot sidewalk/streetscape sections along N. Oak Street, Key Boulevard, and Wilson Boulevard, and a 16-foot wide sidewalk/streetscape along N. Nash Street.

As noted above, the existing slip lane along N. Nash Street will be removed and the intersection with Wilson Boulevard will be brought to a 90-degree condition, consistent with the 2011 approval. This intersection realignment will improve pedestrian and bicycle safety, eliminate a driver-pedestrian conflict point, improve sight lines, and calm vehicular speeds.

The Applicant will realign the Property's existing five curb cuts into a reduced total of four curb cuts, and all vehicular driveway crossings will be designed in a flush condition which prioritizes pedestrian movements and enhanced safety. Vehicular access for drop-off/pick-ups, short-term parking, and ridesharing is proposed adjacent to the Wilson Tower lobby along N. Oak Street and adjacent to the Key Tower along Key Boulevard. Consistent with the 2011 approvals, as amended, the Applicant will carry forward its commitment to remove the existing (and currently decommissioned) N. Nash Street skywalk.

The proposed building will be served by a five-level partially below-grade parking garage containing approximately 602 parking spaces. Fifty-five parking spaces will be reserved for retail/grocery use at a rate of one space per 525.6 square feet of retail GFA. A total of 530 parking spaces will be reserved for residential use at a parking ratio of 0.637 spaces per unit, not including the 17 proposed residential visitor parking spaces. A total of 202 parking spaces (approximately 33.55 percent of the total) will be provided as compact parking spaces. The proposed parking ratios accord with recent multifamily residential approvals and County policies supporting parking reductions for residential development in close proximity to public transit.

The Applicant's proposal generally complies with the Sector Plan goals and policies for service and parking locations and design. The proposed parking garage is tucked into the

Property's natural grade, and any above-grade portions of the garage will be fully screened through architectural treatments, retail/residential uses, and vertical screen wall elements.

Similar to the 2014 approval, two resident/visitor vehicular garage access points will be provided. The first access point is proposed along N. Nash Street in the same general location as previously approved. The second access point, which will predominantly serve grocery store patrons, is proposed to be shifted from its 2014-approved location on Key Boulevard to N. Oak Street in order to accommodate grocery store requirements, topographic constraints, and reduce the potential for vehicle conflicts on Key Boulevard.

Loading and trash access is proposed along on N. Nash Street at two loading docks, one for each tower. The first dock is proposed in the same general location as previously approved. It would serve the Key Tower's residential and dedicated grocery store uses, and accommodate WB-50 to WB-67 trucks to meet the needs of the grocery store. A second dock, located farther south along N. Nash Street, would serve the Wilson Tower's residential and retail uses. The two proposed loading docks will allow greater efficiency for residents and retail tenants.

The proposal will meet the County's bicycle parking standards by providing bicycle storage for 335 bicycles (333 spaces for residents, 2 for retail users, and 26 spaces for visitors). Bicycle storage will be located in secure bicycle storage rooms within each tower, with Key Tower storage room offering direct street-level entry along Key Boulevard.

Project Summary

The proposed project meets the following Zoning Ordinance requirements and recommendations from the Sector Plan and other County policies as follows:

- The proposed uses are generally consistent with the Sector Plan's overall Vision Principles and Goals and Policies. The proposed use will provide 831 residential units and increase the proportion of residential housing supply in Rosslyn, with a residential mix of approximately 96 percent on this block;
- Ground floor retail uses are proposed and strategically located to activate surrounding streetscapes and the 18th Street Corridor, which will play an important role in achieving the Sector Plan's goal to transform Rosslyn into a vibrant, diverse, and sustainable urban district;
- The proposed building heights comply with the Sector Plan's 300-foot maximum height and will enhance and significantly contribute to a distinctive skyline with "peaks and valleys";
- The proposed buildings provide high-quality architecture consistent with the surrounding neighborhood, and exceeds the Sector Plan guidance regarding tower location, separation, and build-to lines;

- The proposed design responds to the Property's significant topographic and below grade bedrock challenges with uses that engage adjacent areas while allowing significantly improved pedestrian access through the Property via the proposed 18th Street Corridor;
- The proposal will deliver a grocery store, which aligns with the County's Retail Plan and Grocery Store Policy;
- The proposal will deliver substantial open spaces, including a major component of the long-planned 18th Street Corridor, which will provide critical pedestrian access between N. Oak Street and N. Nash Street;
- Consistent with the recommendations of the Sector Plan and Master Transportation Plan, the proposal will remove the existing N. Nash Street skywalk bridge and N. Nash Street slip lane, and realign the N. Nash Street/Wilson Boulevard intersection;
- The proposal generally complies with the Sector Plan's recommendations for loading and access; any above-grade portions of the garage will be fully screened from public view; and
- The proposal is consistent with the recently-approved County Board Policy on the Transformation of Commercial Office Buildings in Arlington, the proposed use will replace two older vacant office building, thereby helping to reduce the County's office vacancy rate. The proposed project is also consistent with is consistent with the County's Administrative Guidance for Office Conversions.

Community Benefits

The following is a preliminary list of anticipated community benefits which will be realized through the proposed major 4.1 Site Plan amendment. This list is being provided solely to fulfill the Administrative Regulation 4.1 filing requirements, with the understanding that the final community benefits package will be negotiated throughout the site plan process, and is not agreed upon at the time of application acceptance.

- Streetscape improvements on all Property frontages;
- Provision of ground level public open space;
- Sustainable design elements;
- Utility Fund Contribution;
- Public Art Contribution;

- Transportation subsidies;
- Base affordable housing contribution;
- Transportation Demand Management Monitoring Studies;
- Provision of high-quality architecture;
- Increased real estate and sales tax revenue; and
- Increased housing opportunities proximate to Metro.

Proposed Modifications

The Zoning Ordinance permits the County Board to modify certain regulations for 4.1 Site Plans. With this application, the Applicant requests the following Zoning Ordinance modifications:

- Pursuant to § 15.5.5 of the Zoning Ordinance, the Applicant requests 476,799 square feet of bonus density (not including any GFA exclusions, discussed below) in consideration for community benefits;
- Pursuant to § 15.5.7.A of the Zoning Ordinance, and consistent with County policies, the Applicant requests a reduced parking ratio from one space per dwelling unit to 0.637 spaces per dwelling unit and from one space per 250 square feet of retail GFA after the first 500 square feet to one space per 525.6 square feet of retail GFA due to the limits of the existing below grade garage and the Property's proximity to a variety of public transit options (Courthouse Metro station, Metrobus, and ART bus stops). The proposed parking reduction will allow the Applicant to construct a more transit-oriented development with reduced vehicular traffic to the site;
- Pursuant to § 15.5.7.A of the Zoning Ordinance, the Applicant requests an increased residential compact parking ratio from 15 percent to 33.55 percent due to size constraints in the proposed parking structures;
- The Applicant proposes 29,080 square feet of exclusions from GFA, as detailed in the plan set; and
- All other modifications necessary to achieve the proposed development.

Affordable Housing

The Applicant will work with staff throughout the site plan process to develop an affordable housing plan. The Applicant will comply with § 15.5.8 of the Zoning Ordinance, as amended.

Allowable Density Tabulations

Site Area	Density Allowed for Proposed Uses	Maximum Development	Proposed Development
Existing Zoning: "C-O Rosslyn" District			
By-right: 92,135 sf (2.1 acres)	One-family Dwellings (min. 6,000 sf lot area/unit)	15 units	N/A
	Semi-detached/Duplex (min. 3,500 sf of lot area/unit)	26 units	N/A
	Multiple-family/Townhouse Dwellings (min. 1,200 lot area/unit)	76 units	831 units (MF)
Special Exception: 92,135 sf (2.1 acres)	Multiple-family per § 7.15.4 (max. 10.00 FAR)	921,350 sf	916,140 sf


Summary

The Applicant has carefully planned the design of the proposed buildings, open spaces, and site layout as a cohesive whole in order to achieve harmony between the proposed residential buildings and the fabric of the surrounding neighborhood. The proposed development will provide much-needed residential units, high-quality architecture, and will promote a walkable, activated community experience.

Thank you for your attention to this matter. Should you have any questions or require additional information, please do not hesitate to contact me directly at (571) 209-5775.

Very truly yours,

WALSH, COLUCCI, LUBLEY & WALSH, P.C.



Andrew A. Painter

Enclosures

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