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HAND DELIVERY

March 25, 2010

Marchant Schneider
Loudoun County Planning Department
1 Harrison Street, S.E.
Third Floor
Leesburg, VA 20175



RE: Second Round Referral Comments for SPEX 2007-0021

Dear Marchant:

This letter constitutes the Applicant's response to staff and agency second submission review comments regarding the above-referenced application. Each staff and agency comment is noted in italics, followed by the Applicant's response.

Loudoun County Department of Zoning Administration (comments dated March 12, 2010)

Critical Issues

1. *The required parking demonstrated on Sheet 1, Zoning Tabulations does not appear to adequately address all parking spaces required. The application proposes an FAR up to 606,914 square feet, with 461,967 square feet of special exception uses. The applicant has designated 337,000 square feet as hospital use, leaving 124,967 square feet of medical care facility, outpatient only and an additional 144,947 square feet of by right uses. For the proposed amount of special exception uses, the required number of parking spaces would be 1085. The applicant currently proposes a total of 1003 spaces, a deficiency of 82 spaces. Assuming full build out of 606,914 square feet, this would generate the need for 1563 parking spaces.*

The table on Sheet 1 demonstrates the required parking for the hospital use and up to 100,000 square feet of medical office but does not account for the medical care facility, outpatient only or the remaining 44,947 square feet of by-right office.

While parking is to be demonstrated at the time of site plan, the applicant should address the deficiency regarding parking at this time. If the parking is to be shown on the special exception plat, it must comply with Section 5-1100 of the zoning ordinance. If the intention is to reduce the number of required parking spaces, a special exception will be required.

Response: The Applicant has committed to providing parking according to the Zoning Ordinance requirements and will determine the number of required spaces per each use at time of site plan approval. Therefore, for clarity sake, the Applicant has removed from the SPEX Plat all references to the number of spaces to be provided, noting that the actual number is to be decided with site plan approval.

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2. *In addition to hospital, the Special Exception application is also for medical care facility, outpatient only; however the Special Exception Plat on Sheet 3 does not reflect this use. The proposed location of the medical care facility, outpatient only will need to be labeled on the Special Exception Plat.*

Response: The labels have been revised to reflect potential locations for the medical care facility, outpatient use.

Statement of Justification Comments

3. *Section IV Proposed Stonespring Medical Center - The previous SOJ listed the medical care facility, outpatient only would not exceed 55,000 square feet whether it is located within the hospital or as part of the proposed office building located on the Property. The application now appears to propose up to 124,967 square feet. Please verify. The proposed square foot of each use should be broken down within a table on Sheet 1 of the Special Exception Plat.*

Response: The previous SOJ is no longer applicable. The current SOJ limits overall SPEX uses – both medical care facilities, outpatient only and hospital uses – to 462,000 square feet. Because the SPEX application represents a phased development that will be implemented over time depending on market conditions and, possibly, further regulatory approvals from the State Health Commissioner, we cannot determine at this time the specific allocation of the special exception uses as part of future expansion efforts. We can, however, detail the potential locations for such uses and have labeled them as such on the SPEX Plat.

Special Exception Matters For Consideration

4. *Section 6-1310(C) - Whether the level and impact of any noise emanating from the site, including that generated by the proposed use, negatively impacts the uses in the immediate area. Add a note to Sheet 1, General Notes stating the Noise Standards as listed in Section 5-1507 will be met.*

Response: A note has been added to Sheet 1 that we'll comply with Section 5-1507 of the Ordinance. The Applicant notes, however, that pursuant to Section 5-1507(C), the subject property is not required to adhere to the noise standards of the Zoning Ordinance, as it is located within an area affected by noise from operations at Dulles Airport.

Plan Comments

1. Sheet 1 – General Comments.

a. *Note 1 – In addition to ZMAP-2006-0007, the note should reference SPEX 2007-0037 as the heliport is within the limits of special exception.*

Response: SPEX 2007-0037 has been referenced in the note.

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b. *Note 3 – Verify the calculations of the site area in this note as well as other calculations of square footage throughout the application. For example, 23.22 acres X 43,560 = 1,011,463.2 square feet while the application lists 1,011,524 square feet. This is a difference of 60.3 square feet.*

Response: For the purposes of computing the area of the SPEX application, the Applicant converted feet to acres. If calculated the other way – acres to feet – the number cannot be as refined because the acreage calculation is not as specific, as it's only to the 1/100th decimal place.

c. *Note 16 – Delete this note, as Sheet 5, Architectural illustrations, is noted to be for illustrative purposes only.*

Response: This note has been deleted.

d. *Note 20 – Update this note to clarify the limits of special exception fall entirely within the Ldn 60.*

Response: This note has been updated.

e. *Note 20 -The note also needs to be updated to clarify the floodplain overlay on the site is minor floodplain. In the applicant's response letter, it is stated the approved floodplain alteration study (FPAL-2007-0016) relocates any and all floodplain off-site; however portions of minor floodplain are still within the limits of special exception.*

Response: This note has been updated.

2. Sheet 1 - Zoning Tabulations

a. *Update the title block for the zoning tabulations table to state the acreage of the limits of site plan (23.22 acres).*

Response: The title block has been updated.

b. *Floor Area Ratio –remove the note *maximum 733,036 on Land Bay 2 as this table is solely based upon the limits of special exception 23.22 acres.*

Response: Because the special exception uses are limited to 23.22 acres, as pointed out in this comment, the Applicant has removed the reference to the overall development permitted in the entire land bay. Notwithstanding this revision, Land Bay 2 retains the ability to develop at a maximum of 733,036 square feet.

c. *Building Height – Section 4-306(B) permits buildings up to 45' in height. Update the table as it currently lists 35' as the building height.*

Response: The table has been updated to reflect the 45-foot height limitation.

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d. Landscaped Open Space – Section 4-307(C) requires landscaped open space on any individual lot shall not be less than 0.20 times the buildable area of the lot. As the parcel has not been subdivided, the landscaped open space needs to be provided based upon the entire parcel acreage of 42.07 acres. When providing the corrected calculations, note the zoning ordinance defines buildable area as “the area of the lot remaining after required yards have been provided”. This definition is noted as the original calculations based upon just the limits of special exception appear to be incorrect.

Response: The Ordinance provision cited assumes that an application will encompass an entire lot, rather than a portion of a lot. As noted in comments 2a and 2b above, however, this application covers only a portion of a lot, which is less acreage than the full lot. Thus, the landscaping and open space calculations are based upon the acreage of the special exception area, not the lot. This does not mean, however, that the subject property is relieved of the obligation to comply with the landscaped open space requirements for the full lot, which must be demonstrated as part of subsequent site plan applications.

e. Landscaping, Buffering and Screening – The note regarding ZOAM-2006-0002 may be removed from the table. The provided column references Sheet 3, but the illustrative landscape plan is shown on Sheet 6.

Response: The reference to ZOAM 2006-0002 has been removed as it is superfluous since those regulations have been incorporated into the Zoning Ordinance. The column reference has been updated to reference the landscape plan as shown on Sheet 6.

f. Yards and Setbacks – For the note regarding Section 5-610(B), the correct wording is accessory structures and parking. The reference on the table is accessory buildings and parking.

Response: The note has been revised as requested.

3. Sheet 6 – Illustrative Landscape Plan – Section 5-1407(A) requires buffer yards to be located at the perimeter of a lot or parcel, not just around the limits of special exception. It is noted on Sheet 1 and shown on this illustrative, a Type 1 buffer adjacent to the R-16 zoned Land Bay. The proffers allow for multifamily as well as single family attached in the R-16; therefore a Type 2 buffer should be shown. Per Section 5-1414(B)(1)(d)(i), the plantings for a Type 5 buffer shall be located within the first 50 feet of the 100 foot buffer yard. Some of the plantings appear to be outside the first 50 feet. The typical plant palette should be removed from the sheet as at the time of site plan, a more detailed table will be required detailing the plants in the Type 5 front buffer distinct from the side and rear buffer yards.

Response: As noted above, the subject property is part of a larger lot, so establishing landscaping only at the lot edges does not address the proposed hospital's location along the Future Road B. Thus, to allow for a unified landscaping scheme around the special exception uses and the lot lines, the Applicant is requesting a modification per Section 5-1403(C), which allows the Board of Supervisors to modify any landscaping requirement. The modification would permit a Type 1 front yard buffer, as shown on Sheet 3 of the SPEX Plat, to align Stone

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Springs Boulevard and Future Road B adjacent to the area of the SPEX. In addition, the Type I buffer is more appropriate given the site distance constraints at the intersection of Future Road A and Future Road B referenced in VDOT Comment #5 below.

With respect to the plantings within the required buffer along Route 50, the Applicant requests a similar modification from the Board to permit the plantings be located outside the first 50 feet of the buffer adjacent to Route 50. As part of the underlying rezoning, ZMAP 2006-0007, the Applicant agreed to reserve for future dedication property along the frontage of Route 50 to accommodate a future grade-separated interchange at the intersection of Route 50 and Stone Springs Boulevard. Subsequent to the rezoning's approval, the Applicant learned that Washington Gas required a 20-foot easement along the property's frontage on Route 50 for underground transmission lines. Were the Applicant to plant the first 50 feet of the required buffer as required by the Zoning Ordinance, such plantings would be subject to future elimination once the gas transmission line and/or road improvements were constructed. Accordingly, the Applicant proposes to locate the buffer yard plantings outside the easement and reservation/dedication areas to ensure the plantings are not disturbed and properly serve the function for which they are intended.

Finally, the plant palette has been removed from Sheet 6 as requested.

4. Sheet 7 – *Traffic Phasing & Pedestrian Circulation Plan* – *If the applicant wishes to include this sheet in the plan set, remove the "For illustrative purposes only" as this is a proffered sheet per ZMAP-2006-0007. As the property is subject to the proffers and CDP of ZMAP-2006-0007, this sheet is not for illustrative purposes.*

Response: The note "For illustrative purposes only" has been removed from Sheet 7.

Virginia Department of Transportation (comments dated March 5, 2010)

1. *Please provide draft approval conditions to this office for review.*

Response: County Staff are preparing the draft conditions and will forward them to VDOT under separate cover.

2. *Approval date of ZMAP 2006-0007 Glascock Field at Stone Ridge should be clearly noted on this plan under General Notes on cover sheet 1 of 7.*

Response: The approval date has been added as requested.

3. *Now that turn lane configurations, lengths, etc have been shown on this reactivated application, it should be noted that design waivers/exceptions will be required for all sub-standard roadway elements. As such, it may be more advantageous to simply show Road B as a 4-lane, undivided roadway from Route 50 to Stone Springs Boulevard Extended.*

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Response: The depiction of Road B has been revised to be a four-lane, undivided road with shared through and turn lanes, in accordance with the proffers for ZMAP 2006-0007. Details concerning road geometries will be submitted as part of future CPAP applications.

4. *Does VDOT's new Access Management Regulations 24 VAC 30 -73 apply to this application or is it eligible for grandfathering?*

Response: The road network surrounding the Property was proffered pursuant to ZMAP 2006-0007, which means it predates VDOT's Access Management Regulations. Therefore, it is grandfathered.

5. *Some of the trees shown on the landscaping plan may interfere with required sight distance at entrances especially these on the inside of horizontal curves.*

Response: Per Plan Comment #3 above, the Applicant has requested a modification of the required buffer plantings adjacent to the entire length of Future Road B to allow a constant Type 1 Front Yard Buffer. This reduced buffer will limit interference with sight distance.

6. *Radius return of Route 50 at Gum Springs Road (northwest quadrant) does not line up.*

Response: This has been corrected on the Plat.

Loudoun County Department of Community Planning (comments dated March 11, 2010)

1. *Staff continues to recommend the applicant commit to the policy standard and notes a commitment to 45 dBA was agreed upon as a condition of approval for the hospice special exception application west of Stone Springs Boulevard and within the approved Glascock Field at Stone Ridge development.*

Response: As part of the initial site plan approval for the proposed hospital use, the Applicant agrees to engage an acoustical engineer to prepare a noise study, to be submitted to the Department of Building and Development, analyzing the noise impacts from the adjacent Route 50 on the interior of the hospital and to demonstrate compliance with the Revised General Plan's highway noise policies. Such study shall be completed and submitted prior to approval of the initial site plan for the hospital use. In the event such noise study reveals that highway noise impacts on the interior of the planned hospital exceed the levels recommended in the Revised General Plan, then the Applicant shall utilize building materials or other architectural treatments as part of the hospital's building design to mitigate such impacts to acceptable levels.

2. *Staff recommends a condition of approval regarding a commitment to uniform four-sided architecture for the hospital and outpatient facilities as well as a commitment to similar architecture for the future structured parking.*

Response: The proposed Hospital and Medical Office Building will follow the guidance of the Route 50 Design Guidelines with all sides of the buildings being compatible architecturally. Therefore, all sides will have similar materials and detailing, but they will not necessarily be

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uniform. The design of the structured parking will include architectural features to complement the adjacent buildings.

3. *Staff recommends a condition of approval indicating the commitment to providing the proposed bicycle and pedestrian facilities.*

Response: The Applicant will support a condition of approval requiring bicycle storage and locker rooms for employees, subject to the final language being acceptable to the Applicant.

Loudoun County Department of Environmental Review (comments dated February 25, 2010)

1. *The project results in the permanent impact to all on-site wetlands. Staff understands that ZMAP-2006-0007 includes a wetland mitigation proffer. However, the proffer requires mitigation to occur within Loudoun County only if pricing is comparable. To better comply with Revised General Plan (RGP) River and Stream Corridor Policy 23, staff recommends that a commitment be provided with this application that excludes pricing as a limiting factor. It has been staff's experience that wetland credits outside of Loudoun County are less expensive, making the existing proffer meaningless.*

Response: The above-referenced proffer was committed to with ZMAP 2006-0007, and the Applicant remains bound by those proffers.

2. *Staff recommends providing water quality measures for the northern portion of the property. RGP Surface Water Policy 2 and River and Stream Corridor Policy 11 support the implementation of LID techniques and the protection of stream segments draining less than 100 acres not included in the River and Stream Corridor buffer. The proposed layout results in a substantial amount of impervious cover associated with buildings and parking areas. As currently depicted, the northern portion of the campus will drain directly to an existing wetland/stream system without any type of water quality protective measure. Although stormwater requirements may allow for a "by-pass" scenario, providing water quality measures in the northern portion of the property would allow the project to better comply with the referenced RGP policies.*

Response: The Applicant agrees to install at least two facilities for Storm Water Management / Best Management Practices (SWM/BMP) on the Property in the general location(s) shown on the SPEX Plat. The facilities may consist of ponds (wet or dry), or underground structural measures for the purposes of detention. Additional low impact design (LID) measures will be provided throughout the site as necessary to meet the required phosphorus removal threshold of the governing ordinance in effect at the time of final site plan. The LID measures may generally consist of structural filter BMP's, bioretention, water quality swales, or any other BMP system which is recognized by the County and listed in Table 2-3 of the Virginia Storm Water Management Handbook at the time of final site plan.

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3. *With regards to noise impacts associated with Route 50 and the airport, the applicant's responses agree to provide acoustical treatment to achieve an interior noise level of 55 dBA for the hospital, which does not meet RGP and Revised Countywide Transportation Plan (Revised CTP) noise policies. The applicant's proposal is higher than the 52 dBA identified in the Noise Abatement Criteria (NAC) Hourly A-Weighted Sounds levels table on page 5-45 of the RGP and page 4-7 of the Revised CTP. Furthermore, the applicant's proposal is significantly higher than the 45 dBA recommended by staff due to the hospital being located within the Ldn 60 airport noise buffer and the fact that the hospital use requires overnight accommodations similar to residential uses. Staff recommends that a commitment be provided to perform a traffic noise study and a building shell analysis prior to occupancy to ensure noise levels do not exceed 45 dBA, consistent with RGP and Revised CTP policies. A similar commitment was provided as a condition of approval for special exception application SPEX-2007-0037, for the Hospice use immediately to the west, across Stone Springs Boulevard.*

Response: As part of the initial site plan approval for the proposed hospital use, the Applicant agrees to engage an acoustical engineer to prepare a noise study, to be submitted to the Department of Building and Development, analyzing the noise impacts of the adjacent Route 50 and flight operations at Dulles Airport on the interior of the hospital and to demonstrate compliance with the Revised General Plan's noise policies. Such study shall be completed and submitted prior to approval of the initial site plan for the hospital use. In the event such noise study reveals that highway or airport noise impacts on the interior of the planned hospital exceed the levels recommended in the Revised General Plan, then the Applicant shall utilize building materials or other architectural treatments as part of the hospital's building design to mitigate such impacts to acceptable levels.

4. *The applicant's responses state that they have a history of incorporating green building design standards into their hospitals and are working to incorporate many of those features within the proposed hospital. The responses reference features such as commissioning building systems to determine efficiency, high efficient lighting fixtures, water conserving sinks and toilets, energy star appliances, landscaping with indigenous plants, and using interior products with little or no VOCs or PVCs. The responses go on to state that as the design becomes more finalized, the applicant will be able to highlight more of its green building practices. Staff supports incorporation of green building design approaches and is available to discuss design options with the applicant. County school and public facilities have had recent success incorporating such measures and could be a resource with the proposed project. Including green building design standards within the hospital may reduce long-term costs. In addition, to improve power reliability and efficiency, the applicant may also want to consider combined heat and power (CHP) functionality. A CHP Resource Guide for Hospital Applications can be found at http://www.chpcentermw.org/12-00_library.html#macdocument.*

Response: Comment acknowledged.

Please do not hesitate to call or email with any questions. We look forward to resolving any outstanding issues prior to the April 28 Planning Commission Public Hearing.



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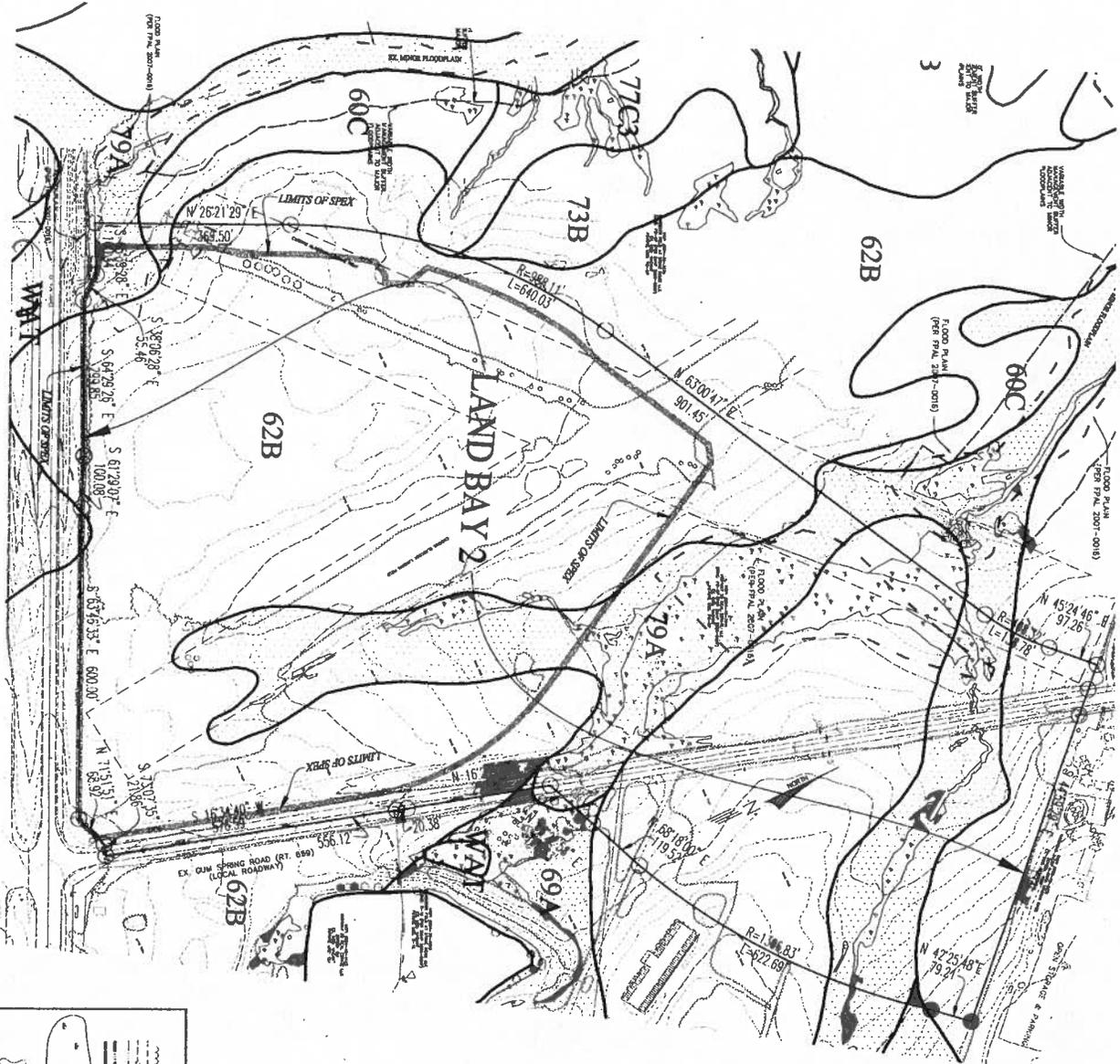
Warmest regards,

A handwritten signature in black ink that reads "Molly M. Novotny". The signature is written in a cursive, flowing style.

Molly M. Novotny

cc: Tracey White, HCA Capital Division
Mark C. Looney, Cooley Godward Kronish LLP

434360 v2/RE



LEGEND

SOIL ID	SOIL NAME	SOIL CLASS
60C	SYCOLINE-CATLETT COMPLEX	CL II
62B	KELLY SYCOLINE COMPLEX	CL II
69A	ELBERT SILTY CLAY LOAM	CL IV
73B	PENN SILT LOAM	CL I
77C3	NESTORIA GRAVELLY SILT LOAM	CL II
79A	ALBAO SILT LOAM	CL IV

LEGEND

	EXISTING WET LINE		Moderate Steep Slopes (1:2.5-2:5)
	EXISTING 2 FOOT CONTOUR		EXISTING WELL
	EXISTING 5 FOOT CONTOUR		EXISTING FENCE
	EXISTING STREAM		VARIABLE WIDTH MANAGEMENT BUFFER
	100 YEAR FLOOD PLAIN LIMITS		
	PROPOSED STREET BOUNDARY		
	WETLANDS/WATERS		
	SOIL TYPES		
	HYDRIC SOILS		



SOILS AND EXISTING CONDITIONS
STONESPRING MEDICAL CENTER
 DULLES ELECTION DISTRICT
 LOUDOUN COUNTY, VIRGINIA
 SCALE: 1" = 100' CL = N/A DATE: MARCH, 2007

PLAN DATE

03-30-07
05-29-07
01-22-08
01-08-10
03-22-10

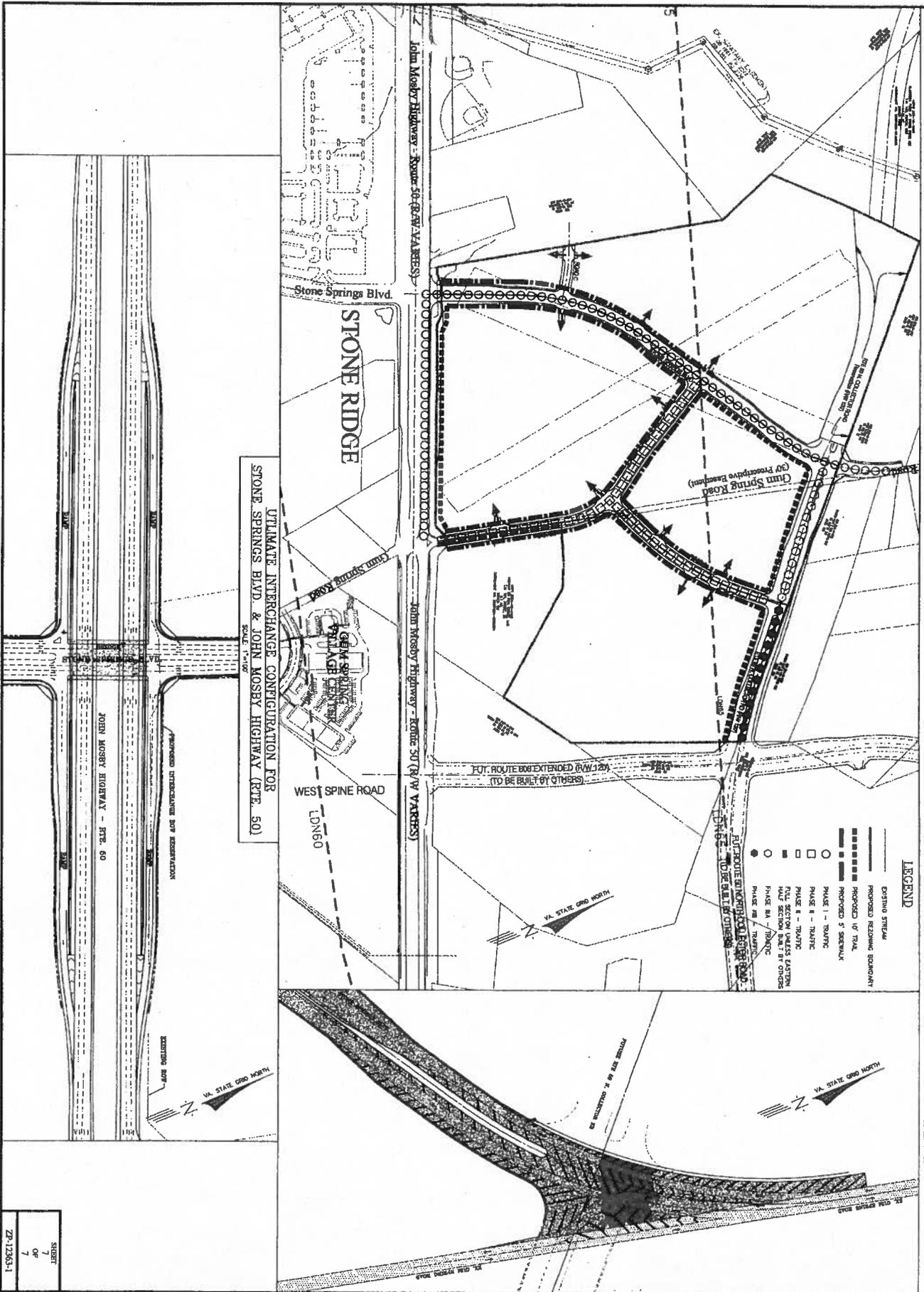
REVISIONS

NO.	DATE	DESCRIPTION

DATE: 2/12/05-1

TRAFFIC PHASING & PEDESTRIAN CIRCULATION PLAN

SCALE: 1"=200'



INTERSECTION CONDITION FOR
STONE SPRINGS BLVD. & GUM SPRING ROAD

SCALE: 1"=40'

<p>Traffic Phasing & Pedestrian Circulation Plan GLASCOCK FIELD AT STONE RIDGE ZMAP 2006-0067 SEEX 2007-0037 DUNCAN'S ELECTRON DISTRICT LOUDOUN COUNTY, VIRGINIA</p>		<p>Urban Engineering & Associates, Inc. CIVIL ENGINEERS • LANDSCAPE ARCHITECTS • LAND SURVEYORS LAFAYETTE BUSINESS CENTER 600-D TECHNOLOGY COURT, CHARLETT, VIRGINIA 26151 PHONE (301) 443-8100 FAX (301) 378-7883</p>	<p>PLAN DATE: 3-2-07 NO. DATE DESCRIPTION 1 3-2-07 2 3-15-07 3 3-15-07 4 3-15-07 5 3-15-07 6 3-15-07 7 3-15-07 8 3-15-07 9 3-15-07 10 3-15-07 11 3-15-07 12 3-15-07 13 3-15-07 14 3-15-07 15 3-15-07 16 3-15-07 17 3-15-07 18 3-15-07 19 3-15-07 20 3-15-07</p>
<p>SCALE: 1"=200'</p>	<p>CL - 2"</p>	<p>DATE: MARCH 2007</p>	<p>REVISIONS</p>

SHEET	7
OF	7
ZP-12363-1	