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BY HAND DELIVERY

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**RE: ZMOD 2008-0009, Lansdowne Village Greens Sign Plan – Phase 2.**

Dear Ginny:

This letter includes our response to the staff review comments we have received regarding the second submission of the sign plan application. Enclosed please find 5 copies each of the revised sign plan and revised Statement of Justification. Also enclosed are an updated Land Development Application form and an updated Disclosure Affidavit.

The staff review comments are addressed below in chronological order. Each agency's comments are summarized (noted in *Italics*) and followed by our response.

The Applicant again wants to reiterate that the overall goal of this application is to replicate within the Phase 2 area the attractive and successful signage program previously approved by the County for the initial phase of the Lansdowne Town Center commercial area (ZMOD 2006-0004). The public purposes of a unified signage theme, design continuity and a seamless sense of place for the Town Center are all dependent on the provision of the previously approved sign types within Phase 2. Anything less will have deleterious consequences on the ambiance and economic health of the Town Center.

**Zoning Administration, Department of Building and Development (comments dated 2/25/09)**

**A. Critical Issues**

1. *Housekeeping Signs – Small: Type HP1 (p. 2D & 20). Sign type HP1 is now under the category of informational signs under Section 5-1204(D)(7)(e). By definition, "Sign, informational" is a sign "to identify such locations as restrooms, loading areas, parking areas, no parking areas, entrances, exits and the like." A sign saying "Thank you for not littering" is not consistent with the definition of an informational sign, as it does not identify the location of an area for the public. Revise the message to be consistent with the definition. Rather than a note on page 20 stating "message shown as example only," staff recommends the applicant provide all possible messages for these signs. Per Section 5-1204(D)(7)(e), informational signs shall contain no advertising. Therefore, please remove the Lansdowne Town Center text from these signs. Finally, staff finds that 20 signs of this nature for five buildings are excessive and*

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*suggests the overall maximum be reduced. (Prior comment A.1)*

Page 20 has been revised to clarify that all messages on the informational signs will be consistent with the Zoning Ordinance definition for "Signs, Informational". Pages 2D and 20 have also been revised to clarify that no more than 10 Type HP1 signs will be permitted. The "Lansdowne Town Center" text is also informational in that it helps distinguish the amenities and uses intended for the mixed-use area patrons from the amenities intended for the residential portion of Lansdowne Village Greens.

*2. Pedestrian Directory: Type P3 (p. 2B & 12). Staff reiterates that this is not a permitted sign type as proposed by the applicant and must be removed from the sign plan. By definition, "Sign, directory" is "A sign on which the names and locations of occupants or the uses of a building or group of buildings is given." The Sign Requirements matrix allows for directories only in conjunction with office uses under Section 5-1204(D)(3)(q) and those office directories may not be visible from outside the building. Outdoor pedestrian directories as proposed by the applicant are not permitted. Finally, it is not appropriate to use Section 5-1204(D)(3)(ii), as this section is for business signs for businesses not listed in the matrix (e.g. banks). (Prior comment A.2)*

Inasmuch as the Board of Supervisors has already approved this exact same sign type under Section 5-1204(D)(3)(ii) for the adjacent portion of the Town Center covered by ZMOD 2006-0004, we have retained the pedestrian directory for consideration by the Planning Commission and the Board of Supervisors. We respectfully submit that the existing pedestrian directories within the Town Center provide visitors, patrons and shoppers with very useful information and are attractive additions to the streetscape. More importantly, this proposed comprehensive sign plan is intended to unify the various phases of commercial and present to the community a single, unified, commercial mixed-use project in Lansdowne Town Center. The proposed directories are a key component of that plan.

*3. Housekeeping Signs – Small: Type HT1 and Housekeeping Signs – Large: Type HT2 (p. 2D, 21 & 22). Sign types HT1 and HT2 are under the category of informational signs per Section 5-1204(D)(7)(e). Per this section, informational signs shall contain no advertising. Therefore, please remove the Lansdowne Town Center text from these signs. Rather than a note on pages 21 and 22 stating "message shown as example only," staff recommends the applicant provide all possible messages for these signs. Finally, the applicant's response (p. 5) explains that these signs will be used only when needed, hence the prior use of the term "temporary." Please note that per Section 5-1203(A), each time a sign is erected a sign permit is required, regardless of the intent to remove the sign when it is not needed. (Prior comment A.7)*

Small sign Type HT1 has been removed from the sign plan. Page 21 has been revised to clarify that all messages on large sign Type HT2 will be consistent with the Zoning Ordinance definition for "Signs, Informational". As noted above, the "Lansdowne Town Center" text is also informational in that it helps distinguish the amenities and uses intended for the mixed-use area patrons from the amenities intended for the residential portion of Lansdowne Village Greens.

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4. *Business Location Sign: Type P2 (p. 2A & 11). Staff reiterates that the proposed signs are directional signs under Section 5-1204(D)(7)(h), not Section 5-1204(D)(3)(ii). As noted above, Section 5-1204(D)(3)(ii) is for businesses not listed elsewhere in the matrix. Revise the comparison matrix on page 2A. Additionally, directional signs shall contain no advertising. Therefore, the Lansdowne Town Center text and tenant names must be removed from these signs. Staff also reiterates that directional signs should not exceed 4 square feet and be no taller than 3 feet. The proposed signs far exceed Ordinance standards and should be revised to be more consistent with the Ordinance. (Prior comment B.6)*

Inasmuch as the Board of Supervisors has already approved this exact same sign type under Section 5-1204(D)(3)(ii) for the adjacent portion of the Town Center covered by ZMOD 2006-0004, we have retained the business location sign for consideration by the Planning Commission and the Board of Supervisors. We respectfully submit that the existing business location/site directional signs within the Town Center provide visitors, patrons and shoppers with very useful information and are attractive additions to the streetscape. As previously stated, this proposed comprehensive sign plan is intended to unify the various phases of commercial and present to the community a single, unified, commercial mixed-use project in Lansdowne Town Center. The proposed business location/site directional signs are a key component of that plan.

**B. Other Issues**

1. *For signs UP2.2 and UP5, the lighting indicated is "Illuminated individual channel letters or Non-illuminated individual letters." For illuminated signs, further specify the type of illumination as either backlight or white light illumination in the matrix on page 2C (to be consistent with the proposed regulations stated on pages 15, 16 and 17). (Prior comment B.4)*

The matrix on page 2C has been revised as suggested.

2. *Project Entry Monument: Type P1 (p. 9 & 10). Staff reiterates that tenant names on this sign should be subordinate to the naming of the town center. (Prior comment B.5)*

Sign Type P1 is the exact sign type approved by the Board of Supervisors for the adjacent portion of the Town Center under ZMOD 2006-0004. The intent is to maintain a consistency for the retail area entrance signage on Riverside Parkway as already exists on Belmont Ridge Road. Further, the Applicant believes that the tenant names are, in fact, subordinate to the project name in the design of this sign.

3. *Light Pole Banners: Type P5.1 (p. 2B & 13). These signs do not require modification. Therefore, in the matrix (p. 2B) please remove the reference to Section 5-1202(A)(3). Since page 13 clearly states that banners shall not be visible from public roads, the applicant may leave these in the sign plan.*

Comment acknowledged.

*The existing banners located along Belmont Ridge Road are prohibited due to their visibility from public roads and inconsistency with ZMOD 2006-0004. Staff reiterates that these signs*

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*should be removed. Staff is unclear as to why the response (p. 6) indicates that the applicant for this ZMOD, Saul Holdings, LP, is not the property owner. County Records indicate that Saul Holdings, LP is the owner of PIN 113-39-9265. (Prior comment B.7)*

Staff is correct that the referenced banners appear to be located either on property owned by Saul Holdings, L.P., or on the adjacent Belmont Ridge Road right-of-way. Representatives of Saul Holdings and Lansdowne Town Center are investigating this matter. In any event, the Applicant notes that PIN: 113-39-9265 is not part of this application.

*4. Office Tenant Signs: Type UP2.2 and In-Line Retail Center Signs: Type UP5 (p. 2C & 15—19). On pages 15 and 16, the office tenant signs are specifically noted as “second level office” and “second level and above office.” It seems that an office user on the first floor would not be permitted signage. Likewise, it is unclear what signage would be permitted for a retail user above the first floor. It seems that UP2.2 sign requirements should apply to all second floor uses (not just office) and UP5 requirements should apply to all ground floor tenants (not just retail). Staff suggests the matrix and related pages for these signs be revised in this manner and would like to further discuss this option with the applicant.*

We appreciate the suggestion and have revised the labels and descriptions for Types UP2.2 and UP5 accordingly. It is our intent that office and retail tenants may occupy any available space.

*5. Office Tenant Signs: Type UP2.2 and In-Line Retail Center Signs: Type UP5 (p. 2C & 15—19). Staff maintains that a graphic should be added to the sign plan that combines the elevation views on pages 16 and 19, showing all signage for a façade. For example, the first two graphics on page 19 are labeled “Condominium/Office/Retail,” yet neither of these graphics depicts office signage. (Prior comments B.10 and B.11)*

The graphics on pages 16 and 19 are examples of where signs may be located on the buildings, but do not represent actual signage scenarios in that spaces occupied by tenants will vary over time as tenants and tenant space requirements change. The referenced labels on page 19 have been revised to avoid confusion.

*6. In-Line Retail Center Signs: Type UP5 (p. 2C & 17—19). Exclusion of the awning is not consistent with the Ordinance. Staff reiterates that the maximum square footage once the awning is added (125 square feet) should be stated for these signs. (Prior comment B.11)*

The intent is not to exclude the area of the awnings, but to distinguish the area permitted for non-awning signs from the awning signs, should tenants opt to use awning signs. The aggregate sign area text for Type UP5 has been clarified on page 2C.

*7. Pages 24 and 25 include graphics depicting restaurant uses. Staff notes that restaurant tenants would be subject to Section 5-1204(D)(3)(dd). If restaurant users are anticipated, the applicant should modify this section of the Ordinance.*

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It is the intent that restaurant uses also will be subject to the proposed regulations for Sign Type UP5. The description of Sign Type UP5 in the matrix has been clarified to include restaurant tenants and a reference to Section 5-1204(D)(3)(dd) has been added.

8. *Staff notes that the middle column of the matrix (p. 2A—2E) listing the “2003 Lansdowne Conservancy Guidelines” cannot be enforced by Staff upon approval of this sign plan, as those Guidelines are a private agreement. Additionally, staff notes that in many instances the Conservancy Guidelines are more restrictive than the regulations proposed by the applicant.*

In order to avoid confusion, the middle column of the matrix has been deleted.

9. *In the final version of the sign plan, please ensure that page 4 is provided in the 11” X 17” format indicated on page 3.*

Page 4 will remain an 8½ X 11 page and the note on page 3 has been revised accordingly.

**Community Planning, Department of Planning (comments dated 2/27/09)**

Entrance Signs. *While the proposed non-residential entrance signage (P1) is uniform in design and composition to existing entrance signage it is excessive as the primary retail area is already being served by existing signage. Staff recommends providing entrance signage with project identification only. Staff recommends removing sign type P1 and reducing the size of sign type P7 to be more in keeping with the pedestrian scale of a town center development. Lastly, staff recommends the applicant commit to landscaping surrounding the project identification entrance signage utilizing native species as much as possible and a commitment to long-term maintenance of the landscaping.*

The Town Center retail area has two main entrances, one on Belmont Ridge Road and one on Riverside Parkway. The Zoning Ordinance allows up to three entrance signs for retail centers. The Type P1 sign on Belmont Ridge Road was approved under ZMOD 2006-0004. This application proposes the second such sign type at the Town Center’s primary retail entrance on Riverside Parkway. We respectfully submit that two such signs, of identical design and on two different streets, are not excessive. Rather, we believe these signs are necessary and warranted.

While Sign Type P1 serves as the primary sign to identify and support the commercial character of the Town Center, Sign Type P7 is intended to serve as a distinct and compatible architectural entrance element, more in the style of the understated residential community entrance sign. For Sign Type P7, the aesthetic of the low, curved stone wall is the primary design component, with the text serving a necessary role as a secondary component in that design. We believe that Sign Type P7 adds to the vitality of the Town Center as a defining, attractive and appropriately scaled element at this mixed-use entrance on Riverside Parkway. Like Sign Type P1, Sign Type P7 will be framed with generous and appropriate landscaping and will not be internally illuminated.

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*Directional Signage.* Staff recommends the applicant remove tenant names from site directional signs (sign type P2) as these signs should be for wayfinding purposes only. Staff further recommends reducing the size and scale of sign type P2 in keeping with the pedestrian scale of the town center. Sign type P3 should be removed from the sign plan (see Zoning Administration first and second referrals).

For these signs to function as true wayfaring signs, the locations of specific destinations, i.e., tenants, need to be identified. We respectfully point out that both Sign Types P2 and P3 have been approved for the adjacent portion of the Town Center under ZMOD 2006-0004. We also point out that a significant number and variety of signage has already been removed from this application.

*Building-Mounted Signage.* Staff recommends reducing the number of signs proposed for the in-line retail stores (UP5) to one building-mounted sign per façade and one under canopy or flagmount (blade) sign; additional signage is unnecessary and adds to visual clutter.

The ground floor commercial signage in this application for Buildings S, F, R, U and V continues the theme established with ZMOD 2006-0004 to promote a consistent and harmonious town center, albeit that the buildings have been phased and will be developed by different owners. Furthermore, the limitations to Sign Type UP5, as detailed on pages 2C and 17, were developed to cap and prohibit visual clutter, thereby allowing for the delivery of the same tasteful signage that exists in the adjoining portion of the Town Center. For example, with the exception of awning signs, which are limited to 10% of the total awning area, each ground floor tenant is allowed a maximum of 75 sq.ft. for Sign Type UP5. Tenants that opt to use text or graphics on awnings are permitted up to an additional 50 sq.ft. of such text/graphics per awning. The signage flexibility afforded by this Sign Type will add to the vitality of the retail area and, quite frankly, often times is a requirement for leasing commercial space to quality tenants.

*Housekeeping and Marketing Signs.* Staff requests the applicant provide all possible messages for permanent and temporary housekeeping signs. Messages provided on both permanent and temporary housekeeping signs should provide wayfinding information only. Staff recommends reducing the number of permanent housekeeping signs as the amount proposed appears excessive and adds to visual clutter. The proposed site directional signs (sign type P2) already provide wayfinding information at two locations along Diamond Lake Drive. Lastly, staff recommends reducing the number of commercial marketing signs to a maximum of one to help reduce visual clutter.

The sign comparison matrix has been revised to include a maximum of 10 signs for Sign Type HP1. The commercial marketing signs, Type M1, already limited to no more than 4 signs total, have been further limited to allow no more than 1 such sign per building.

*Banners.* Staff reiterates the proposed banners are not consistent with the signage anticipated in a mixed-use community where the streetscape, buildings and landscape should remain the predominate feature, not the signage. The proposed banners have the potential of contributing to visual clutter and provide the same information as provided on the proposed traditional signage. If permitted, the proposed banners should be less obtrusive, fewer in number, and

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*more in keeping with the character of the buildings in the community. Restraint should also be used in selecting colors for the banners. A condition of approval should be developed to ensure that the proposed banners will not be used for advertising.*

The proposed banners are more architectural embellishments than signs and add seasonal visual interest and vitality to the Town Center. The limited number of proposed banners are located along private streets internal to the Town Center.

We believe this response letter, the revised sign plan and the revised Statement of Justification address the remaining review comments.

Please do not hesitate to contact me if you have any questions or if you require any additional information.

Very truly yours,

Cooley Godward Kronish LLP



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Senior Land Use Planner

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