

***KINGSTOWNE RESIDENTIAL OWNERS CORPORATION***

March 31, 2026

Supervisor Rodney L. Lusk  
Franconia District Supervisor  
Fairfax County Board of Supervisors  
7130 Silver Lake Boulevard  
Kingstowne, VA 22130

Commissioner Christopher "Chris" Landgraf  
Franconia District Planning Commissioner  
Fairfax County Planning Commission  
7130 Silver Lake Boulevard  
Kingstowne, VA 22130

Re: Special Exception Application – Independent Living Facility  
Tax Map Parcels 91-3(8), 1, 2, 3, 4, 5A, A and B  
Beulah Street Corridor

Dear Supervisor Lusk and Commissioner Landgraf:

The Board of Trustees of Kingstowne Residential has reviewed the proposed Independent Living development referenced above. Following that review, the Board voted 6–0 to oppose the application as currently presented.

Kingstowne Residential supports the provision of housing opportunities that allow residents to age in place. However, support for that objective does not extend to proposals that are incompatible with surrounding communities or that impose impacts on local infrastructure that have not been adequately justified or addressed.

**Special Exception Standard**

As you know, approval of a Special Exception requires a determination that the proposed use is compatible with surrounding uses and will not adversely affect the health, safety, or welfare of the community. Based on the materials available to date, we do not believe that standard has been met.

In particular, the applicant's statement of justification does not appear to provide a sufficient analytical basis demonstrating that this location, at this intensity, is appropriate for the proposed use, especially when considered in the context of surrounding residential neighborhoods and cumulative development in the Franconia corridor. Approval would set a precedent that other developers could follow. It would signal that R-1 parcels are suitable for institutional scale development through a special exception.

**Density, Height, and Massing**

The Board is particularly concerned with the density, height, and overall massing of the proposed development.

The proposal would introduce a high-density townhouse-style independent living community on property that is currently characterized by low-density zoning and a wooded condition. At approximately 86 units on roughly 10.9 acres, the proposal represents a substantial increase over the baseline density of the site.

In addition, the proposed building heights—reportedly approaching four stories and approximately 50 feet—combined with the overall scale and concentration of units, raise significant compatibility concerns with adjacent residential communities within Kingstowne.

In the Board's view, the combination of density, height, and massing results in a level of intensity and proximity that is not consistent with the surrounding neighborhood context and has not been adequately mitigated through design or buffering.

**Proximity to Existing Neighborhoods**

As mentioned above, the Board is very concerned about the proximity of this level of development intensity to existing homes within Kingstowne. The scale of the proposed structures and the distribution of large townhomes across the site create the potential for visual, operational, and compatibility impacts that extend beyond what would typically be expected from residential development in this setting. The Board also notes that the submitted plans reference potential vehicular and pedestrian connections to adjacent properties. Kingstowne Residential does not support the creation of interparcel connections to this development, and any such connections should be expressly prohibited as part of any approval. Furthermore, KROC will not grant any easements for stormwater infrastructure associated with this development, and the application should be evaluated accordingly.

In that regard, please note the following:

- The submitted plans indicate that the proposed stormwater management system requires a storm outfall that depends on off-site easements, including a proposed 10-foot storm easement extending beyond the limits of the subject property.
- The application materials do not demonstrate that any required off-site easements have been secured, nor do they establish that the applicant has control over the property necessary to implement the proposed drainage system.
- As a result, the project appears to rely on third-party property interests to function as designed, raising questions regarding feasibility and whether the plan can be implemented as proposed.

- In addition, the site appears to include marine clay soils, which are known to:
  - limit infiltration capacity;
  - increase reliance on engineered conveyance systems; and
  - present potential settlement and stability challenges when disturbed.
- These subsurface conditions are particularly relevant given that the proposed stormwater system already depends on off-site conveyance and discharge, rather than fully on-site solutions.
- The combination of:
  - off-site easement dependency,
  - distributed drainage infrastructure, and
  - marine clay soil conditions,

raises concerns as to whether the proposed stormwater management approach is fully engineered, feasible, and appropriate for this location.

- The Board is further concerned that excavation and grading activities associated with the development—particularly in marine clay soils—threatens to:
  - affect soil stability;
  - require dewatering; and
  - create risks related to settlement, vibration, and groundwater movement.
- Given the proximity of existing homes within Kingstowne, these potential threats warrant extremely careful evaluation and mitigation.

### **Operational Intensity**

Although the proposal is presented in a townhouse-style format, the Board remains concerned that the development will function as a 24-hour operational facility, with associated staffing, deliveries, service vehicles, and medical transportation.

These operational characteristics distinguish the project from conventional townhouse development and significantly contribute to the overall intensity of use on the site.

### **Cumulative Infrastructure Impacts**

Finally, the Board believes that weight must be given to the cumulative impacts of existing and already-approved development in the Franconia area.

The corridor is already experiencing significant growth pressure. Additional development—particularly at the scale and intensity proposed here—should be evaluated in light of that broader context, including impacts on transportation, stormwater systems, and public services.

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**Conclusion**

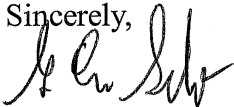
For the reasons outlined above and included in Attachment A, the Board of Trustees of Kingstowne Residential respectfully opposes the Special Exception application as currently proposed.

We remain willing to engage constructively with the applicant and the County should the proposal be substantially revised to address the concerns identified above, particularly with respect to scale, compatibility, and infrastructure impacts.

We respectfully request the opportunity to meet with you or your staff as the review of this application proceeds.

Thank you for your consideration.

Sincerely,



Board of Trustees  
Kingstowne Residential  
Owners Corporation

## ATTACHMENT A

### Key Planning and Infrastructure Concerns

#### Proposed Independent Living – Beulah Street

1. **Density Increase Relative to Zoning**
  - Existing zoning: approximately 1 dwelling unit per acre
  - Proposed development: ~86 units on ~10.9 acres (~7.9 du/ac)
  - Represents an approximate 8x increase over baseline density
  - Such an increase warrants heightened scrutiny under Special Exception standards
  
2. **Building Height and Massing**
  - Proposed structures reportedly up to ~50 feet / 4 stories
  - Significantly taller than surrounding residential development
  - Creates:
    - Visual dominance over adjacent homes
    - Reduced privacy
    - Potential light and shadow impacts
  - No clear transition in scale between proposed development and existing neighborhoods
  
3. **Intensity of Use vs. Residential Appearance**
  - Project is presented in a townhouse-style format but operates as:
    - 24/7 managed facility
    - With staff, vendors, and service operations
  - Includes:
    - Shift changes
    - Deliveries (food, medical, maintenance)
    - Waste hauling
    - Medical and paratransit traffic
  - Operational intensity exceeds that of traditional townhouse development
  
4. **Dispersed Site Impacts (Townhouse Model)**
  - Unlike centralized senior living buildings, this layout:
    - Distributes activity across the site
    - Requires internal circulation and multiple service points
  - Results in:
    - More widespread traffic movement
    - Less containment of noise and activity
    - Greater interface with surrounding areas
  
5. **Proximity to Existing Homes**
  - Development places higher-density, multi-story structures in close proximity to:
    - Established Kingstowne neighborhoods

- Raises concerns regarding:
    - Compatibility
    - Scale transition
    - Neighborhood character
6. **Cumulative Development Pressure**
- Franconia/Beulah corridor already includes:
    - Approved but unbuilt residential projects
    - Pending development applications
  - Combined effect:
    - Increased traffic demand
    - Greater strain on infrastructure
  - Proposal should be evaluated within this cumulative context, not in isolation
7. **Transportation and Access Concerns**
- Beulah Street already experiences congestion at peak times
  - Additional impacts from:
    - Staff commuting patterns
    - Delivery/service vehicles
    - Visitors and medical transport
  - Need for:
    - Cumulative traffic analysis
    - Evaluation of access safety and capacity
8. **Stormwater and Environmental Impacts**
- Site currently wooded with lower impervious coverage
  - Proposed development likely increases:
    - Impervious surface area
    - Runoff volume
  - Potential downstream impacts:
    - Drainage systems
    - Adjacent properties
9. **Insufficient Justification for Special Exception**
- Applicant's submission does not appear to:
    - Demonstrate site-specific need
    - Justify the scale and intensity of the proposal
    - Address cumulative infrastructure constraints
  - Special Exception findings require more rigorous justification
10. **Requested Outcome**
- Denial of the application as currently proposed, or
  - Substantial redesign addressing:
    - Reduced density
    - Lower building heights

- Improved buffering and transitions
- Demonstrated infrastructure capacity

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