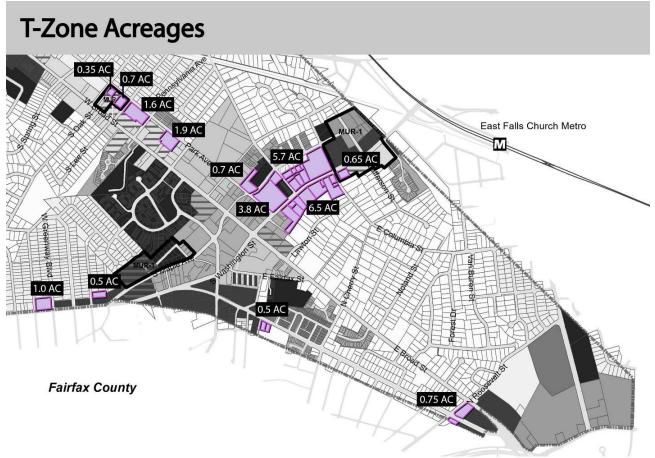
Comments for Consideration by the City Council – June 5, 2023

On behalf of the Broadway Condominium Association, the Broadway T-zone Task Force requests that the City Council rescind its May 22, 2022, action approving a first reading on T022-09, an ordinance to amend current Transition Zone (T-Zone) rules. The proposed ordinance is contrary to Council goals. The latest "revised concept update" (referred to as the "Update" below) for T-zones demonstrates that this idea needs to be completely rethought. We recommend that the Council: 1) leave the current T-1 and T-2 zoning in place exactly as it exists today; and 2) create a new T-TH (Transitional Townhouse) District for potential rezoning of select T-1 properties. The Council needs to put planning ahead of implementation and, instead of a new first reading, direct the Planning Commission to engage the public and developers in formulating development strategies in transition neighborhoods.

Leave the Current T-1 and T-2 Zoning in Place Exactly as it Exists Today

The City Council and the Planning Commission have been progressively stripping significant properties from the scope of the T-zone proposal. Frankly, there's not much left. What is left should not be subject to the rather confusing "solution" being proposed. The City has provided this map of T-zone acreages.



- 1. The "Update" removes all T-2 properties (chart on line 29) from the rezoning. This removes approximately 4.5 acres from consideration.
- 2. In its February 15 recommendations, the Planning Commission proposed "c. To promote commercial activity, **do not allow residential uses** (under T-(TR22-09) T zones) along N

Washington St north of Great Falls S." We are not aware of any new direction on this by the City Council, but the "Update" states: "The current proposal...**would allow** for **an all residential** development along N Washington Street." This appears to represent a 100% rejection of the Planning Commission recommendation with no explanation of why. The "Update" goes on to state that it might be prudent to rezone these properties to T-2 or B-1 which would <u>not</u> allow all-residential zoning. In the midst of such confusion and contradiction, it would seem to us to be most prudent to leave these properties in the existing T-1 zone. That takes an additional 14.85 acres out of consideration.

- 3. The "Update" discussion of S Washington properties (lines 290 to 300) suggests that properties in this area should be moved from T-1 zoning to multi-use B-Zone categories. That takes another 1.5 acres out of consideration.
- 4. The East End Area Plan is quoted in lines 311 to 314 of the "Update" which states that these properties near 24-Hour Fitness should be considered for rezoning from T-1 to B-1. That takes another 0.75 acres out of consideration.
- 5. The Madison Homes at Park Avenue townhouse community between Pennsylvania Avenue and Virginia Avenue on Park Avenue is a well-established and attractive part of the community. We would certainly hope that the City would not contemplate or advocate demolishing a community such as this simply to replace it with another somewhat denser housing community. That takes about another 1.9 acres out of consideration.
- 6. Two properties on Oak and Pennsylvania Avenue owned by OakParkOne LLC is already the subject of a development proposal for zoning variances under existing T-1 rules and would not benefit from a new T-zone "Update." That takes another 0.35 acres out of consideration.

The only remaining properties that have any potential for near-term development are those on Park Avenue between Pennsylvania Avenue and the Hilton Hotel parking lot: a total of 2.3 acres (1.6 acres of which is adjacent to the Broadway Condominium). Thus, a proposal that originally addressed about 3% of the property in the city and about 30 acres of land (line 165 of the "Update") now addresses less than 8% of the original 30 acres **and less than 0.17% of the land in the City**.

It is totally unrealistic to try to achieve affordable housing goals, dramatically increase residential housing in the City and achieve regional housing goals in such a miniscule area. Imposing the density and height standards in the "Update" on a handful of small properties will destroy the ambience of Park Avenue for the whole City community, permanently and irrevocably lower housing values in the Broadway and substantially reduce the quality of life of the aged and vulnerable residents of The Kensington. It would also be punitive toward current small-parcel property owners who would have to pay a disproportionate price to achieve City goals for which all citizens should share the cost. Park Avenue requires a tailored solution that fits the character of the street and the nearby public buildings and Cherry Hill Park. It is with that in mind that we recommend that the City create a new T-TH zoning district.

Create a New T-TH (Transitional Townhouse) District for T-zone Properties

The City Code has 5 categories of building rules for residential properties and 3 categories of building rules for business properties. It would be perfectly appropriate and perfectly consistent with City zoning policy to have a development district in the Transition Zone that would allow for more dense townhouse development than is allowed in residential zones.

By their nature, townhouses would be a better solution for Park Avenue than apartment buildings or condominiums. They will create far less significant traffic and parking impacts on nearby streets. They

will produce green and welcoming open areas. They will generate fewer stormwater challenges. High density townhouses are the perfect transition between more intense density buildings like the Broadway and the Kensington and residential single-family homes.

Today, the only townhouse construction authorized in the City is under the R-TH District rules (Attachment 1). These developments can only be built on lots that are 3-acres or larger. As a result, none have been built in recent years. The new T-TH zoning district should be modeled along the lines of the existing R-TH standard and modified to allow more intensive, smaller scale development.

We hope that the City Council will not go forward with a new first reading but will, instead, endorse the concept of a T-TH zoning district and ask the Planning Commission to work with citizens, property owners and nearby residents to ensure that this is a solution that can work for all. We also hope that the Planning Commission will be instructed to have formal meetings and pop-up discussions to refine this proposal. Here's a broad outline of the things that our Broadway T-zone Task Force recommends be included in a new T-TH zoning standard:

• We propose that townhouses in the new T-TH district be built "by-right" with no Special Exception or Special Use Permit processes required.

Recognizing that townhouses are the least intrusive type of structures for T-zones and that they should be incentivized, we recommend that lots designated as T-TH be allowed "by right," without requirements for a Special Exception review or a Special Use Permit. We believe that a clear set of zoning district requirements and a rigorous Site Plan review will be adequate (just as is now the case for R-TH properties).

• We propose that townhouses in the T-zone could cover from ½ to 2 acres.

By setting a half-acre minimum for townhouses, we hope that this will encourage those with micro lots (some are as small as 0.12 acres) to consolidate their property with their neighbors to reap the benefits of greater development opportunities. We believe that this strategy is preferable to making single family homes and duplexes prohibited uses and taking away the property rights of our neighbors. The two-acre limitation comes from the City Zoning Ordinance Advisory Committee Report from 12/30/2010. That report suggested that a consolidation of properties to achieve parcels of 2 acres or less in the Transition District was a reasonable planning target.

• We propose that there be a maximum building lot coverage be 55% with a process to justify slightly increased coverage.

The current townhouse standard is 40% with an allowance to permit an increase to 44% based on a common green. A 55% recommendation is above the 50% recommended by the City Consultant Susan Bell in Spring of 2021. Madison Homes at Park Avenue has 50% lot coverage and Great Forest Townhomes on Park Avenue has 32% lot coverage (examples provided by the City). With more intense development goals and broader price points, greater land density is appropriate in the transition district.

• We propose that authorized heights be increased from the 35 feet allowed in the current R-TH standard and that specific heights and setbacks should be determined depending on how close buildings are to adjacent zones.

Current T-zone height standards for commercial buildings are 45 feet. The maximum height allowance for single-family homes is 35 feet. The "Update" calls for townhouses to be 3 stories

and 40 feet (whichever is less) or 4 stories and 50 feet through an SUP. We do not believe that the SUP process should be in place for townhouses. Instead, the City should limit the height of townhouses in its rules and hold the property owner to whatever standard is set.

We believe that the current arbitrary setback and step back requirements should also be adjusted to reflect their true purpose: to give the citizens occupying new developments and the citizens owning adjacent properties adequate boundaries and distance so that all can live together cooperatively and comfortably. We also believe that there should be special consideration in planning given to "commercial buildings" like the Broadway and the Kensington where the sides of those building facing the T-zone are **IN FACT** residential. They need to be treated as such. The standard should be simple: "If it looks like a duck and quacks like a duck, treat it like a duck!!" There is precedent in the City for split zoning. Broad Falls Apartments are zoned B-1 on W Broad Street where they are primarily commercial and are zoned Residential Multi-Family on the opposite side where the building is exclusively apartments (See <u>W Broad</u> <u>Street Small Area Plan Zoning</u>). The City can find a way to use a mechanism like this for the Kensington and the Broadway which are in exactly the same position. This could be established as an innovative pilot approach which might later be generalized to all T-1 development.

We have some suggestions that should be considered by the Planning Commission. Rather than having the 25-foot (front yard), 20-foot (side yard for a corner lot), 10-foot (side yard for an interior lot), and 40-foot (rear yard) foot setback requirements that apply to the R-TH standard, we propose that Transition District townhouses have height and setback requirements that are congruent and complimentary to the neighborhoods in which they reside. The objective should be to allow increased density with gradual transition and increased height as structures are further from residential areas. One possible approach could be:

"Height for Townhouse dwellings shall be dependent on their proximity to surrounding neighborhoods and structures.

- a.) Where townhouses face R-Zone areas across a street, they must not exceed four stories or 40 feet in height.
- b.) Where townhouses face other T-zone or B-zone properties across a street, they must not exceed four stories or 45 feet.
- c.) When structures are immediately adjacent to R-Zone properties or B-Zone properties that are 100% residential in nature (this would include the Broadway and the Kensington and private homes remaining in T-zones), they should not exceed 35 feet when 10 feet of the property line, 40 feet when 15 feet of the property line and 45 feet when 20 feet of the property line."

In a Planning Commission-led development of a T-TH ordinance, planning objectives and property owner and neighbor concerns should be taken into account and thoughtfully considered.

• We propose that the new T-TH District not contain specific affordable housing unit requirements or cash-in-lieu requirements.

Although we strongly support affordable housing, we think that it is unfair to force a small property owner to effectively pay a 10-15% affordable housing tax to the City when a single-family homebuilder can build a dozen houses and pay nothing. According to the numbers in the City plan (lines 93 to 109) only about 30 or 40 homes could be built on the 2.3 acres with any

potential for near-term development on Park Avenue. That is just too small a number of residences to justify applying some sort of formula that requires 15 to 20% of the units to be affordable. None of the other eight City zoning categories are subject to a requirement like this.

- We propose that the City define reasonable expectations concerning unit sizes and density. The R-TH standard contains a lot of detail defining minimum unit and lot standards. In order to increase density in the T-TH zone, these minimums could be replaced with maximums or could require a mix of unit sizes to promote the concept of diversity in housing options. The Planning Commission should seek community and developer input on this. The City should be realistic in this determination. As an example, it might look at the new Townhouse development at 7700 Leesburg Pike. That "Tysons Ridge" community projects homes ranging is size from 1,700 to 2,800 square feet.
- We propose that maximum permissible sound levels in the new T-TH District be the same as those lower levels permitted in the existing R-TH District.
 Pages 28 and 29 of the April 24 Staff Report on T-zones introduced "maximum permissible sound levels into the T-zone discussion for the first time. Sound level requirements should be controlled by use. T-zones between the Broadway's 100% residential community and the single-family residential communities in the adjoining neighborhood should not be treated as "business use" sound districts. T-TH sound level standards should be identical to R-TH sound level standards.
- We support the impermeable surface limitation and the tree canopy requirements suggested by the City Arborist and the Planning Commission.

The residents of any new townhouses and their neighbors in adjacent properties have a joint interest in creating a serene and green buffer that fits in with the character of the City and improves the quality of life for all residents of the City. These standards have wide support in the community.

• We propose that the site plan approval process for townhouses provide robust stormwater protections.

The Broadway and all properties downstream on Tripps Run are subject to extreme stormwater runoff risks. Special care needs to be taken to protect city residents when significant new development takes place. Fairfax County recently held public hearings and engaged neighbors and citizens in 2-way discussions regarding the Tysons Ridge townhouse development at 7700 Leesburg Pike (something the City of Falls Church has **NEVER** done in 2 years of pursuing this initiative). Stormwater management was a major concern of residents in that area (see <u>Fairfax</u> <u>Planning Commission Meeting October 6, 2022</u>). The resulting Fairfax Planning Commission statement that was incorporated into their planning documents would be appropriate for the Park Avenue area where similar and potentially much more serious water problems exist: "Provide stormwater management controls above the minimum standards to the greatest extent possible to reduce runoff to good forested conditions; provide for an adequate outfall as informed by the Middle Potomac Watershed Plan; and to help mitigate downstream flooding." The City should look at how Fairfax County is implementing this plan in its zoning requirements for specific properties like the Tysons Ridge townhouses.

The purpose of this outline is not to craft a detailed T-TH set of development rules, but to give some examples of rules that would fit areas in the T-1 zone where greater density is required, but a park-like

setting needs to be retained. Once the City Planning Division works with local property owners and townhouse development companies we sincerely hope that it will allow new development that will create beautiful and more affordable homes for our new neighbors.

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W. Frederick Thompson Broadway Condominium T-Zone Task Force Director 502 West Broad Street

Attachment 1: Current Zoning Language for Residential Townhouse District

Attachment 2: Specific Comments on "Review of Revised Concept for Update of Transitional (T) Zones, Dated June 5, 2023" and released to the public on June 1, 2023 (These are my personal comments and are not being submitted on behalf of the Broadway Condominium T-Zone Task Force)

Attachment 1

Current Zoning Language for Residential Townhouse District

DIVISION 5. - R-TH, TOWNHOUSE RESIDENCE DISTRICT

Sec. 48-330. - Intent.

The R-TH, townhouse residence district shall be designated exclusively for townhouse dwellings. It is intended to provide an alternative housing style with architectural controls, limited flexibility in site design, and higher densities than permitted in single-family districts. An R-TH district shall be established only on property that has at least one side contiguous to land zoned other than R-1A, R-1B or O-D.

(Code 1982, § 38-19(a); Ord. No. 1166, 11-24-1986; Ord. No. 1277, § 3, 10-10-1989)

Sec. 48-331. - Principal uses permitted by right.

Townhouse dwellings in the R-TH, townhouse residence district shall be subject to the following criteria:

(1)Every townhouse dwelling shall have a minimum lot area of 2,640 square feet.(2)Every lot shall have a minimum width of 24 feet for interior lots and 44 feet for corner lots, and 34 feet for end lots within the interior of a block.(3)The front yard setback shall be no less than 25 feet.(4)The side yard setback for corner lots shall be a minimum of 20 feet. The side yard setback for end lots within the interior of a block shall be a minimum of ten feet. (5) The rear yard shall be no less than 40 feet. (6) All townhouse dwellings, except end dwellings and those on corner lots, shall occupy the full width of the lot.(7)The minimum gross site area shall be three acres (130,680 square feet), prior to any dedications of property for public use. An additional area of at least three acres may be added to an existing R-TH district; provided such an area is shown for such use on the adopted master plan; and provided it is contiguous to the existing R-TH district. The development of the added area shall be compatible with the existing district in terms of architecture, landscape design, and site layout; and shall be compatible in terms of setbacks, landscaping, building heights, and massing of buildings with any adjacent development within an R-1A and R-1B districts. (8)In no case shall the lot coverage, including dwelling and accessory structures exceed 40 percent of the building lot.(9)A common green area may be provided in lieu of a part of the minimum lot area, subject to the following provisions: a. When a common green area is provided, the minimum lot area may be reduced below 2,640 square feet. The reduction in the minimum lot area shall be equal to the total number of square feet in the common green area divided by the number of lots in the project, but in no event may the minimum lot area be reduced below 2,400 square feet. b. Where a common green area is provided, the lot coverage specified in subsection (9) of this section may be increased in proportion to the reduction in the minimum lot area, but in no event may the lot coverage including dwelling and accessory structures exceed 44 percent of the building lot. c. A common green area may be utilized only for lawns, trees, planting areas, ornamental pools, similar landscaping uses and swimming pools. No part of the common green area may be utilized for automobile driveways or parking areas, for sidewalks, for paved play areas, for other similar paved areas, or for buildings of any type. d. Adequate measures, as certified in form and content by the city attorney, must be provided, through deed restrictions or other legally binding arrangements, that ownership of the common green area shall be vested in an association of all of the owners of the townhouses; that it shall remain as a common green area in perpetuity, with suitable restrictions upon its use; and that the necessary funds shall continue to be provided by the owners in perpetuity to cover suitable maintenance of the lawns, trees, shrubs, pools, etc. e. It is the intention of the developers of the project to sell the townhouses

individually.(10)Every townhouse dwelling shall have a minimum gross floor area of 1,500 square feet with a minimum of 750 square feet per floor, exclusive of attic and garage, and exclusive of basements which are more than 50 percent underground.(11)Parking spaces for each dwelling may be provided: a. Within the lot with entrance from the front and with at least one of the spaces completely enclosed; b. On a private access road which is not counted as part of the required minimum 2,640 square feet of lot area; or c. Within the lot, with entrance from the rear; provided that an alley used for ingress and egress is not counted as part of the required minimum 2,640 square feet of lot area.(12)Townhouse dwellings abutting each other shall have complementary but not identical facade or treatment of materials, predominantly of brick, natural stone or other approved masonry construction.(13)There shall be at least four but no more than eight townhouse dwellings continuously connected. There shall be an open space of at least 20 feet between any two such groups of continuously connected buildings. (14) No more than two abutting townhouse dwellings shall have the same front yard setbacks. Building setback variations as required shall be at least three feet. Abutting townhouses shall not have a common roofline.(15)Soundproof and fireproof walls shall be provided between adjoining dwellings at least up to and including the underside of the roof, as directed by the division of inspections. (16) Service areas, such as rear yards, visible from a street, must be screened by not less than a five-foot-high wall of material similar to the adjoining dwelling.(17)Each dwelling shall be self-contained as to heating, air conditioning, and utilities.(18)Front yard areas shall be provided with lawn and appropriate shrubbery planting, except on areas designated for walks and driveways.(19)In addition to compliance with the above criteria, townhouse site plans shall be submitted to the planning commission for approval in accordance with article V, division 7 of this chapter. The site plan shall include a landscaping development plan, which, to the greatest extent possible, shall preserve the natural character of the site and preserve as much mature vegetation as possible. (20) The scheme of general development detailed on the approved site plan shall be protected by covenants running with the land as certified in form and content by the city attorney. Such covenants shall vest in the first grantee and inure to the benefit of his heirs, successors or assigns; each of whom shall be specifically eligible to membership in an association of all the owners of townhouses. Such association should address and control matters of common interest including aesthetics and integrity of the common scheme. a. It is not intended, however, that the creation of such association shall provide a means of overriding the desire of any townhouse owner to insist upon perpetuation of the scheme of general development. b. Such scheme of general development may be modified by a decree of a court where such modification is consonant with modifications in the provisions of this division. c. It is specifically intended that such covenants are for the benefit not only of owners of townhouses, but for the city as well, and the city may bring suit to enforce such covenants to maintain and perpetuate the common scheme as depicted on the approved site plan.(21)Townhouse dwellings shall not exceed the lesser of three stories or 35 feet in height. (22) Streets within the development shall be public and shall be planned and constructed to meet the minimum public street standards of the city for streets within R-C developments, as adopted by the planning commission, unless such requirement is waived by the planning commission.(23)A maximum density of ten dwellings per acre shall be permitted, based upon the gross site area. (Code 1982, § 38-19(b); Ord. No. 1166, 11-24-1986; Ord. No. 1277, § 3, 10-10-1989)

Sec. 48-332. - Conditional uses permitted by special use permit. There are no conditional uses permitted by special use permit in the R-TH, townhouse residence district.

(Code 1982, § 38-19(c); Ord. No. 1166, 11-24-1986; Ord. No. 1277, § 3, 10-10-1989)

Sec. 48-333. - Conditions applying to permitted uses.

There are no conditions applicable to permitted uses in the R-TH, townhouse residence district.

(Code 1982, § 38-19(d); Ord. No. 1166, 11-24-1986; Ord. No. 1277, § 3, 10-10-1989)

Sec. 48-334. - Accessory uses permitted. Accessory uses permitted in the R-TH, townhouse residence district are as follows:

(1)Gardens (private).(2)Lighting (artificial, outdoor).(3)Parking (off-street, private).(4)Playgrounds (private).(5)Swimming pools (private). (Code 1982, § 38-19(e); Ord. No. 1166, 11-24-1986; Ord. No. 1277, § 3, 10-10-1989)

Sec. 48-335. - Additional requirements. There are no additional requirements applicable to the R-TH, townhouse residence district.

(Code 1982, § 38-19(f); Ord. No. 1166, 11-24-1986; Ord. No. 1277, § 3, 10-10-1989)

Sec. 48-336. - Conflicting provisions.

The provisions of this division shall not repeal any other section of this chapter; except, in any conflict between any other provision of this chapter and this division, the provisions of this division shall, as applicable to townhouses, govern.

(Code 1982, § 38-19(g); Ord. No. 1166, 11-24-1986; Ord. No. 1277, § 3, 10-10-1989)

Secs. 48-337-48-360. - Reserved.

Attachment 2

Specific Comments from Broadway Resident Fred Thompson on "Review of Revised Concept for Update of Transitional (T) Zones"

Comments below are my personal observations and reference specific line numbers from the report.

Line 29

The chart states that maximum unit density is 20 units per acre. However, in the examples on pages 8 and 9, each of the charts show 20 units on 0.7 acres. Shouldn't the cap be 70% of 20 or 14 units? Likewise, shouldn't the minimum be 70% of 8 units or 5? (seems like you'd have to round down to the number of complete units).

Lines 31 to 47

I find the formula for affordable housing to be incomprehensible. It talks about "density," but it doesn't describe density. It only describes the number of units. This is confounded and not explained in the charts on pages 8 and 9. Number of units is not density when it doesn't deal with square feet. This would be far simpler if the City of Falls Church would follow the recommendations in its own December 2010 Zoning Ordinance Advisory Committee Final Report. That report recommended that the City modernize its zoning code by using Floor Area Ratio (FAR) as an objective measure of density. I did an Internet search and found that that the words "Floor Area Ratio (FAR)" occur less than 10 times in the Falls Church City Zoning Code (Chapter 48) whereas they occur 262 times in the Fairfax County Zoning Code and over 100 times in the Arlington County Zoning Code. It is the standard way that building density is measured. Using a standard like that would make much more sense than what is presented – especially since both charts show a wide range of individual unit variance (from 800 square feet to 3,120 square feet). Perhaps the City should take a breath and update its zoning code and bring it into compliance with State law instead of getting wrapped around the axle trying to hammer a square peg into a round hole.

Line 63 Chart – 1-4 Family Buildings

Are the June 5 column recommendations additive, or do they remove and replace prior April 24 recommendations regarding single-family homes, duplexes, triplexes and quadplexes?

Line 63 Chart – Parking

What does "1 space per Residential dwelling unit" mean? Is it a minimum or a maximum? Does it mean a 3,120 square foot townhouse can only have one parking space and no more? Does it mean that a townhouse community cannot have guest parking or parking for utility trucks or move-ins? And what does "commercial varies by use" mean? Does it mean that city-wide standards for all T-zone parking are the same as for all other zoning districts or does it mean something else? Since both the April 24 and the June 6 column say exactly the same thing ("commercial parking varies by use") in exactly the same words, what exactly is the difference?

Line 63 Chart – Districts

What does 4,000 square feet refer to regarding commercial use? Is this a footprint? Why was it chosen? Is it per building? Could a building have twenty 4,000 square foot commercial uses inside of it? It's befuddling.

Lines 90 to 108 – Building Pictures

I have no idea what these pictures are supposed to show and how they differ. Other than the windows being bigger on the second chart, I don't see a difference. I don't know why the City cannot use professional design software that our neighbors seem to be able to use for free to show actual proportional building designs. Also, it would be nice if this could show the surrounding buildings of the Kensington and the Hilton parking lot wall so we could see the density and setback impacts. Once again, befuddling.

Lines 150 to 160

References in this discussion suggest that new housing would be most desirable in areas with "access to high-capacity transit." The City has an opportunity to increase housing – including affordable housing - in a transit hub as a result of the West Falls Senior Housing Extension request submitted to the Council last month. A 15-story building on that location could be re-purposed to have much more impact on both affordable housing and diversity of housing prices in the city than would two acres of T-zone properties. It is not likely (possible?) that a new senior housing building manager will sign up to the same deal that the last manager found unworkable and uneconomical. The City has an excellent chance to rethink the land use within walking distance of the Metro and use it to add substantially to housing in the City. Moreover, since the senior housing project at West Falls was originally approved, there is now an application for a similar purpose by Paul Quinn. It seems like his location would be better for this type of function. A reexamination of the proper use of the West Falls site would benefit the City and the developer and would likely improve the timeline of bringing new tax revenue to the City.

Lines 336 to 364 Santa Barbara Average Unit Density Program

Why does the City need to examine practices in Walla Walla Washington and Santa Barbara California to construct its residential density plans? Aren't there Virginia projects under Virginia Law that would provide equal or better benchmarks? Do we know if the Santa Barbara plan was successful? The report states that it resulted in 400 new units over 10 years. Given the differences in size and housing market between Falls Church City, Virginia and Santa Barbara, California, that frankly doesn't sound like a lot. Specifically, Santa Barbara differs from Falls Church in a number of important ways:

- 1. It is about six times the size of Falls Church City;
- 2. Its residents include George Lucas, Stephen Spielberg, Prince Harry and Oprah (Oprah's house, by the way, is valued at over ninety million dollars and her estate is 44 acres 14 acres larger than the total area of T-1 and T-2 properties in Falls Church City -- See: <u>Oprah's House</u>); and
- 3. It has its own ocean the Pacific!

What thays

W. Frederick Thompson502 West Broad Street Unit 509