



Reston Citizens Association

July 14, 2013

Ms. Heidi Merkel
Senior Planner
Department of Planning & Zoning
Fairfax County

Dear Ms. Merkel,

On behalf of the Reston Citizen Association, I want to thank you for this opportunity to comment on V.4 of the draft Reston Areawide Comprehensive Plan. Like our comment previously on V.3, we present our thoughts by first looking at the updates on earlier versions and then provide comments on the transportation section that is the focus of V.4.

Follow-up on Earlier Comments and Draft Versions

Community-wide Jobs:Households ratio. First, and very importantly, we thank you for amending the proposed Reston-wide jobs-to-household ratio from 3:1 to 2.5:1—basically continuing our current ratio. The importance of lowering that ratio cannot be overstated given the north-south logistics constraints created by the Dulles Corridor in Reston. We simply can't afford to have Reston become any more "job heavy" if we expect to have a chance of meeting Reston's vehicle trip reduction objectives as well as broader environmental and other community planning principles.

GSF per Office Worker. Let me thank you and Fred again for your response to my series of queries to Chairman Bulova regarding the inaccuracy of using 300GSF per office employee as a planning standard and its implications for the Reston community. You have probably also seen my reply to Fred's letter, and I hope that you will consider the implications of the documented decline in GSF per office worker in Fairfax County it shows since 2000. Without going through the argumentation in my series of letters, I am increasingly of the impression that future office development will see overall occupancy at about 150GSF/office worker, and 200GSF/office worker would be a more than substantial conservative planning standard for the County.

Air Rights. We believe that DPZ should reconsider its position on the matter, especially in light of new efforts in Arlington County to acquire air rights over I-66 in the Rosslyn. We definitely recognize the greater complexity of dealing with MWAA, Virginia, and the US Government in acquiring air rights along the Dulles Toll Road, but we believe doing so will accrue to the benefit of community development.

“Non-Degradation” of Road Network. We object strongly to the revised language as opposed to earlier versions highlighting easing traffic congestion. This objection is reinforced by the stated goal of achieving LOS “E” for the road network in the new Transportation Section. Given that several of Reston’s “gateway” intersection fall miserably into the LOS “F” level, we believe the two statements are contradictory.

- Relatedly, we need to understand, whether in the CP language or otherwise, what exactly is meant by “existing road network.” As I inquired at the last RTF meeting, does this term mean some kind of average service level across all intersection, gateway intersections, etc., throughout the day (or workday), peak periods, or peak hour. Without a clear understanding of what the term means, we are all lost as to whether it measures something useful or not.

Distance from Metro station. We had a discussion of this topic at the last RTF meeting in which various people were arguing that the ¼- and ½-mile rings for defining the TOD area should be from the entrances rather than the platform as stated consistent with County policy. We see no merit in extending the rings outward; it will only permit additional density. If you plan to change to change the standard, we need to re-visit Scenario G and further reduce allowable density levels to offset the increase in density by expanding the rings. Otherwise, all the work on impact analysis will be in error.

District names confusion: We and others have complained about the confusion created by the similarity of several district and sub-district names in the draft Plan language. We hope that progress is being made in addressing this issue.

- As I more broadly stated, there is a lot of bureaucratic terminology in the draft Plan that is confusing—e.g.—TOD area vs. transit station area vs. “transit station mixed use area” (p. 16)---to the lay reader, including those of us experienced in reading this material. We would recommend, at the minimum, that a glossary be provided with the Plan so the distinctions between terms can be identified and preferably that they be eliminated altogether with the Plan written in clear common language.
- Another example in the draft language is the confusing use of “intensity” (which we generally interpret as the number of people—residents or employees) and “density” (which we generally interpret as FAR or physical mass of development). It is especially important that these terms be clarified.
- Along the lines of the above, terms like “feasible” and “achievable” and “possible” are used frequently in the draft Plan. From this lay person’s perspective, “feasible” generally means cost-effective using some reasonable metrics, reflecting a business decision; the latter two terms point to the technical ability to achieve an end without reference to cost. As a nation, having landed an operating exploratory vehicle on Mars, it is hard to imagine that any of the various

goals, standards, etc., identified in this draft Plan are not “achievable” or “possible.” Is that what you mean? If not, the language needs to be changed (probably over our objection).

Achieve Greater Housing Diversity. We strongly endorse the progressive requirement for WDUs as development FAR increases. It is absolutely essential for sustaining Reston’s goal of providing housing for people in all walks of life.

Parcel Consolidation and Coordinated Development: We recommend the strongest possible language to encourage consolidation or coordination with strict constraints on development density for parcels that are not consolidated or coordinated. Conversely, bonus density for consolidation (preferred) or coordinated (less bonus) may be the way to go per p. 22.

Phasing to Public Facilities. The draft language says “. . . it is critical that space for most, if not all, of these facilities be secured within the first 10-20 years of the Plan’s implementation.” We believe the timeframe should be limited to the first 10 years since (1) property values are currently relatively depressed, (2) as the TSAs are developed, the cost of property for public facilities will grow rapidly, and (3) if the County is serious about phasing development with infrastructure, it will be important to have the space on hand to provide that public facilities. The lack of public facilities space (& the facilities) will inhibit development.

Environmental Stewardship/Stormwater Management (pp. 36-37). We simply do not understand the longer new section of language presented in this version and will reserve our right to comment later. We have asked an environmental expert to help us with evaluating the new language and its consistency with Reston’s planning principles.

We will say this about the extensive new language: Any section that offers as many options, including one that says “to the extent possible” and “to the maximum extent practicable,” sounds like one that is offering way too many outs for sound environmental stewardship.

Library. This section (p. 51) begins “The TSAs are served by the Reston Regional Library...” In fact RRL serves the entire Reston community—and more. The language needs to be changed. Moreover, whether remodeled or re-built, RRL must stay in Town Center or Town Center North where (a) it has abundant access to public parking and (b) is at the focus of Reston’s projected population growth. As noted in our comment on V.3, we would strongly encourage that RRL be re-constructed in a North County Government Center complex to use the minimum amount of the limited available public space.

Transportation Section

Transportation Improvements. The first paragraph of this section identifies three goals for transportation improvements. We believe that a fourth is required: The substance of the first sentence from the “Network Level of Service” section (p. 30) that states, “An overall Level of Service (LOS) “E” goal is expected for the street network in the Reston Transit Station Areas.” This could be a substitute of (3) in the draft language (grid of streets), since the grid is one way to achieve the desired LOS.

We believe that at least one paragraph needs to be added to this opening section noting the adverse impact of ***the Dulles Corridor as an obstacle to north-south mobility in Reston*** (by whatever means) and the special needs it places on improving trans-corridor transportation. This is especially important since TOD theory emphasizes a grid of fairly close together streets and Reston will have one (& eventually maybe 2) links per TOD area across the Dulles Corridor. The impact of the Corridor in constraining reasonable mobility in the TOD areas cannot be overstated.

Our greatest concern is the lack of attention given to **pedestrian safety and mobility** in, to, and through the TOD areas. Some particulars:

- There must be pedestrian **access to the TOD area** through a system of sidewalks, trails and bike lanes. The RA trail system should be connected to the TOD areas, with proffer money as needed. Additional sidewalk links along arterials and collectors need to be provided. Efforts should be made to review the adequacy of these links within 1 ½ miles from the station entrances.
- **Within the TOD area**, pedestrian travel should have priority. Within these areas, most travel from bus stops, Metro stations and parking areas will be on foot. There should be an integrated sidewalk system throughout these areas.
- Of immediate concern, there must be safe pedestrian routes, particularly in **the Wiehle station area**. Routes over or under Wiehle, and Sunset Hills are particularly needed but also between the Reston Metro Station and Town Center. There needs to be pedestrian safety islands on the arterials and collectors.

The attention to **public transit** is also weak and needs expansion. With the restricted parking proposed on p. 33, access to and from the TOD areas from north and south Reston and areas outside the Silver Line zone will be by bus. With the opening of the Reston and Herndon station in five years, the Fairfax Connector route structure should be re-examined and re-organized. There is a need for:

- Bus express lanes particularly during rush hour.
- Bus stops that avoid restricting other traffic (see Wiehle for an example of what should not be!).
- Frequent shuttle bus service to move riders from the stations to businesses and offices outside the ¼ - ½ mile zone. Shuttle connections between the TOD areas—particularly to Reston Town Center—will be needed.
- Express bus service from outlying areas to the TOD center. Creation of expanded park and rides in outlying areas.
- A direct bus link from the Reston station to the Reston transit center (not the round about routing through Town Center Drive or Reston parkway proposed).
- Frequent shuttle service between North Town Center and Town Center and Reston station.

Road Transportation Improvements. We believe the list of improvements should be listed in something resembling priority (timeliness & importance) order. As such, the Soapstone Overpass would be first on the list in our view, and more needs to be said about this vital connection. In our view, it is important that:

- This overpass should connect with Soapstone Drive on the south end (and the existing grid of streets in south Reston) and with the W&OD trail for ped/bikes on the North end. In particular, you need to drop “approximately” from the Soapstone Drive area. Linkage to the street network in south Reston by direct link to Soapstone is essential. (In a similar vein, drop “approximately” from the discussion of a South Lakes overpass (p.27). As above this should not dead end into Sunrise Valley but link directly to South Lakes Drive.)
- It should link into the planned Reston Station Blvd (apparently not in the original FC DOT commission).
- It should eventually be four lanes with adequate bike and pedestrian ways ("eventually" so it might be built in—and, therefore, designed to accommodate—sections).
- It preferably should link into the future grid of streets at Isaac Newton.

At this time, we are extremely concerned that this vital connection will be left on the County drawing room table to languish until developer proffers are available to pay for it. We believe such a course of inaction is regrettable, especially given the importance attached to this connector in the RMAG report five years ago and FCDOT’s ranking it as the most effective major improvement possible in its impact analysis of Scenario G.

The last paragraph in this section regarding evaluating roadway improvements (p. 27) should also include metrics for environmental impact (especially air pollution from not doing a project or doing it inadequately) and personal and business economic impacts (fuel consumption from being delayed in traffic for drivers, less attractive development alternative from burdensome congestion, etc.).

This paragraph should also address other intersection situations that should be avoided. Besides the awkward angles, minimizing exclusive turn lanes, and small block sizes, these requirements should include avoiding high-speed traffic and keeping speeds down.

Street types. We suspect that this section is boiler plate other than the assignment of various Reston streets to various street types. We find the street type definitions to be so vague as to be useless in distinguishing between the expected use of one type of street from another. More importantly, we do not agree with some of the street assignments:

- Town Center Parkway: Identified as a “collector street,” defined as roads that “route traffic to major and minor arterials from the local streets” is simply wrong. Town Center Parkway will be one of the few crossings of the Dulles Corridor as stated in the draft language in this section. Moreover, it has a rather large traffic handling capacity. It should be at least a “minor arterial.”
- Hunter Mill Road. In the strictest sense of what it physically is today, this road is a wagon trail that has been paved over with two one-lane bridges and a narrow Dulles Corridor underpass. Yet, it is the only direct link from Rt. 7 to Vienna and Oakton, and it is heavily used. By definition, it at least a “Minor Arterial (Boulevard)” despite its woefully inadequate construction. It very much is a road that carried longer-distance traffic from adjacent areas. It ought to be constructed as a four-lane road from Rt. 7 for the seven miles to the intersection with Rt. 123 in

Oakton as described in the draft language standards, with all the related bridge and underpass updates.

- Wiehle Avenue. Listed as a “minor arterial (type B),” this street competes in volume with Reston Parkway (minor arterial—Type A) from near Rt. 7 to the DTR, especially during peak periods. It is drivers’ last chance to access the DTR from Rt. 7—and thousands do just that each workday, causing some of Reston’s worst traffic conditions. Per FCDOT’s Scenario G presentation, it will have more hours of traffic congestion at the intersection of Sunset Hills than any of Reston’s other major intersections. It needs to be improved, first by putting it the right street type.

Network Level of Service. More jargon. **What does this mean?** If the goal means all intersections in the TSA areas meet LOS “E” during peak period at the minimum, we may be able to support that. If it is an average of all traffic in a 24-hour day, that does not work. In general, we believe it would be valuable to include a chart that shows the expected peak period (morning and evening) LOS at all the “gateway” intersections, and maybe others of importance within each TOD area.

Re #1: “determine whether addition of capacity and/or increased operation efficiency is achievable without decreasing pedestrian walkability....” This appears to assume that no improvements may also be made to pedestrian and bicycling facilities as improvements are made to streets. In particular, grade-separated pedestrian and bicycle crossings would virtually eliminate walkability/bikability issues.

“In lieu of additional lanes, it is preferable to add links to the street grid....” This may be true; it also may not be true either on a cost-effectiveness basis or on a walkability basis. This statement should be dropped or radically amended to reflect the economic and mobility impacts—including vehicle mobility—of adding lanes in concert with improving adding walkability improvements. It is an oversimplification of the transportation improvement process.

Re #3: Regarding financial contributions, we believe this paragraph needs to state that any funds collected through taxation, proffers, other means for transportation (or other) purposes in Reston be set aside in a special fund dedicated to that purpose in Reston. Too often in Reston’s experience, funds raised here are sent elsewhere or general funds that might have been spent in Reston are diverted elsewhere because Reston has its own funds. (Right now, there is no better example than the proposed Reston Recreation Center.)

Table T2 and accompanying text re vehicle trip reduction. This table and text are unclear as to what the trip reduction will be from—from current levels, from hypothesized future levels based on certain assumptions, etc. In general, we want to encourage vehicle trip reduction, but we want to know precisely it is we are doing.

Relatedly, when Table T2 speaks of “Non-TOD Areas,” we assume that is within the Phase 1 study area, not the totality of Reston. If the latter is true, we do not support the goal no matter what the reduction is from.

Finally, we believe there should be strong financial penalties for failing to meet significant vehicle trip reduction goals by developers in addition to a requirement that they right what's wrong. The funds from these penalties, as stated above, should be directed at improving mobility in the Reston TSAs, not dispersed to other parts of the County or other uses.

Parking Management. We believe the parking targets for the TOD areas should be stated as maximums. There may also be a need for a minimum, defining a range of acceptable parking capacity, but a minimum is insufficient for encouraging residents, workers, and shoppers/visitors from refraining from the use of their cars to travel to and from there.

In the second footnote to Table T3, we don't have the slightest idea what "Sections 11-103," etc., refer to. Let's make this Plan one real people—not just development attorneys—can understand.

Funding of Transportation Improvements and Services. Two key principles:

- Funds raised for Reston TSA transportation (or other) purposes through taxes, proffers, etc., in the Phase 1 study area should be applied only to the Phase 1 area, and otherwise available County funds should not be diverted elsewhere to offset the additional funds raised by and for Reston TSAs.
- Those who will benefit financially from the development and redevelopment of Reston's TSAs should be the ones that pay for any and all infrastructure improvements that facilitates that development. It is neither the duty of the Reston community nor County residents to subsidize private sector profits.

These principles ought to be incorporated in the Plan text.

Again, we thank you for your patience in considering these concerns and hope that you will find them worthy. We look forward to discussing them and the next iteration of Plan language on July 30th.

Sincerely,

Terry Maynard
RCA Representative
Reston Task Force

