

July 28, 2013

Ms. Heidi T. Merkel, AICP,
Senior Planner, Fairfax County Department of Planning & Zoning
Department of Planning & Zoning
Planning Division, Suite 730
10255 Government Center Parkway
Fairfax, VA 22035-5505

RE: Comments to Version 4 (June 25, 2013) of the DRAFT Comprehensive Plan Text for the Reston Transit Station Areas – Land Use Section, Transportation Section, Environmental Stewardship Section; Parks, Recreation Facilities and Cultural Facilities Section; Public Facilities Section.

Dear Ms. Merkel:

On behalf of the Board of Directors for the Reston Association (RA), I am writing to inform you that it is our opinion that revisions are needed to the Version 4 draft Plan text in order to ensure that Reston's unique character is preserved.

The following comments are in addition to, and do not repeat, comments Reston Association has provided to the earlier Versions 1, 2 and 3 of the Plan text.

1. On Page 2 of the text, the description of the Herndon Transit Station Area ("TSA") boundaries are incorrect. The TSA area should not extend outside the Phase 1 Special Study Plan Amendment area. What purpose is served by extending the TSA boundary southward to Fox Mill Road? This would extend the Herndon TSA boundary outside of the Phase 1 Study area. The previous version of the Plan text is preferred, wherein Sunrise Valley Drive is the southern boundary of this TSA. This is preferred because Page 3, Concept for Future Development, states that areas within the TSA boundaries do not include stable, existing land uses. Using Fox Mill Road as a boundary will subject stable, existing residential land uses in Reston to mixed use redevelopment.
2. The following sentence, taken from the Reston Association's "Welcome to Reston" publication, should be added at the end of paragraph one, page 4, where the history of Reston is summarized: "The sustainable design of the community lends itself to the preservation of parkland, natural areas, clean lakes and walking trails."
3. Page 5 states that mixed-use development is desired in the TSAs. This is confusing, because elsewhere the text clearly states that mixed-use development is desirable only within the TODs. The TSA and the TOD district boundaries are not intended to be the same (see Page 12, Transit Station Area Land Use

Concept, where it states that the TSAs are composed of both TOD and non-TOD areas).

4. The draft Plan text envisions a total of approximately 30 million gross square feet of office space within the Reston-Herndon suburban center sub-units (the "Corridor"). See, Planned Development Potential, p. 17. This maximum amount of office space corresponds closely to the "Scenario E + Baseline" office development level proposed in the Task Force report, updated 11-27-12 (the "Preferred Development Scenario"). This Preferred Development Scenario envisions 37,265,559 gross square feet of total commercial space within the corridor (office, retail, hotel, etc.) and 114,936 jobs.

This Task Force Preferred Development Scenario allows the number of households (dwellings) within the corridor (not including the areas of Reston outside the corridor) to increase from 5,860 dwellings (in 2010) to 27,932. County staff estimates that this results in a jobs to households ratio within the corridor of 4:1. However, the jobs to households ratio objective in the proposed Plan Text (page 5) is measured across the entire Reston community – i.e., both the Reston-Herndon Suburban Center sub-units included in the Phase 1 Plan Amendment and the rest of Reston. County staff opine that this 4:1 ratio for the Corridor equates to an overall "greater Reston" jobs to households ratio of 2.5:1. Staff previously opined that it would equate to an overall "greater Reston" ratio of 3:1.

There is a discussion among Task Force members regarding whether a 3:1 or a 2.5:1 jobs to households ratio objective should be applied to the overall Reston community. Some Task Force members have calculated that a 2.5:1 ratio will increase the number of households identified in the Preferred Development Scenario by 1,000. If so, this would likely result in (i) between 195 to 280 more vehicle trips each hour during the 7-9 a.m. and 4-6 p.m. peak periods, and (ii) an additional 1,000,000 square feet of multi-family building gross floor area.

Neither of these changes to the Preferred Development Scenario have been analyzed by County staff, the Task Force or the Reston community. Is an overall level of service ("LOS") "E" for the road network still attainable? Can 1 million square feet of additional building gross floor area fit in, without unacceptably reducing open space and existing mature vegetation?

We believe that the jobs to households ratio used in the Plan text should reflect the "buckets" of maximum development intensity/density and the mix of uses reflected in the Task Force's Preferred Development Scenario. Any change to this mix of uses or increase in maximum gross floor area of development, will necessitate a restudy of (i) whether an overall level of service (LOS) "E" can be attained for the Reston area road network, and (ii) whether the parks, open space and recreational/cultural needs of the community identified in Table X (p. 32) must be adjusted. Such restudies will likely delay implementation of the much awaited Plan Amendment.

We recommend that the jobs to households ratio objective in the Plan text clearly state that it reflects the same number of jobs and households used to develop the Task Force's Preferred Development Scenario.

5. The TOD and non-TOD District Map (referenced on page 12) should show hard edges for both the TSA boundaries and the TOD district boundaries. This includes both the ¼ and ½ mile rings. Neither of these rings should extend beyond the Phase 1 Special Study boundaries into stable neighborhoods and existing open space. This is consistent with Page 21, which describes existing stable residential and open space areas as being outside of the TSA areas.
6. To further clarify that no new increased development is envisioned south of Sunrise Valley Drive within Reston, except in the Reston-Herndon Suburban Center Sub-unit E-2, the phrase "planned development north of Sunrise Valley Drive" should end the last sentence of the Sunrise Valley Corridor bullet point

under Linear Parks, p.47.

7. Page 13. Maintaining a lower intensity of uses in that portion of the Reston Town Center TOD district, which is south of the Toll Road, is important to the preservation of nearby stable residential and open space areas. Staff's proposed text is strongly supported.
8. Page 14. A lower intensity/density development pattern in the non-TOD District areas, particularly the Reston East and Central Sunrise Valley Districts, is crucial to the preservation of nearby, stable residential and open space areas. Staff's proposed text is strongly supported.
9. The proposed Plan text discusses various ways to ensure that there is a balance of land uses and available transportation infrastructure. However, conspicuously absent from the text is a discussion of a maximum cap or limitation upon the number and location of jobs and households to amounts which do not overburden the available transportation infrastructure. This is important because this same transportation infrastructure serves not just the TSA corridor, but all of Reston.
10. The Road Transportation Improvements listed on Page 26 should be closely reviewed and vetted amongst the greater Reston community. Attached are maps showing the location of these proposed changes to the road network.
11. The proposed Plan text (Page 30) states a goal of maintaining an overall LOS "E" on the road network within the Transit Station Areas. How is this "overall" rating calculated? The individual intersection ratings contained in the Traffic Impact Analysis (TIA) seem to be worse than LOS "E."
12. Methods to mitigate traffic congestion generated by new development are identified on Pages 30-31. Surprisingly, this list of methods to avoid traffic gridlock does not include the best method – i.e., on a site specific basis, approve a lower intensity or density of development. The highest intensity/density envisioned in the Plan for a particular project should be attainable only if the LOS "E" or better is met for all portions of the Reston road network affected by the new development.
13. The Transportation Demand Management programs recommended in the proposed Plan text (Pages 31-33) are important because they will likely reduce peak hour(s) vehicle trips on the Reston road network by 30 - 35 percent. This is because of three things: (i) the proximity of convenient rail and bus transit; (ii) the proximity of jobs and housing; and (iii) the limitation of new housing to transit-oriented multifamily housing. However, this means that 65-70 percent of the total of new households and new jobs will generate vehicle trips on the Reston road network. The maximum amount of new development – jobs plus households – should be in balance with a realistic road network, so that an overall LOS "E" or better is maintained.

The TIA analyzes significantly less development than is allowed by the Preferred Development Scenario – 3,373 less dwellings and 2,706,143 less commercial gross floor area. We are concerned that this undercounting will result in a misrepresentation of the traffic impacts to the Reston road network from the level of development envisioned/allowed by the Plan text. This undercounting is exacerbated by the fact that the Preferred Development Scenario does not count additional bonus residential densities allowed in the Plan, or additional redevelopment within the corridor but outside the TODs.

14. Stormwater Management measures are specifically listed on Pages 36-37. How do these measures compare to the new state-wide regulations which the County must adopt prior to July 1, 2014? Further, how do these measures compare with those applied by the County to the Tysons Urban Center area?

15. Below grade parking structures should be encouraged. The draft Text only mentions above grade parking structures. Limited land area and the challenges of preserving an adequate amount of landscaped open space are best solved by the use of below ground parking.

On behalf of RA, I want to thank you, in advance, for taking our recommendations and amendments to the June 24, 2013 draft Reston Transit Station Areas Comprehensive Plan Text into consideration. Please do not hesitate to call me at (703-203-2727) or e-mail me at BODKnueven@reston.org, if you have questions, comments or if you would like to discuss this matter with me further.

On Behalf of the Board of Directors of the Reston Association,



Ken Knueven
President

cc: The Hon. Catherine M. Hudgins, Hunter Mill District Rep., Fairfax County Board of Supervisors
The Hon. Frank A. de le Fe, Vice Chair, Fairfax County Planning Commission
Ms. Patty Nicoson, Chair, Reston Master Plan Special Study Task Force
Reston Association Board of Directors

Enclosures

Figure 4 - Transportation Improvements for the Reston and Route 28 Studies

