Comments on the July 29, 2013, Draft Changes to the Comprehensive Plan for the Dulles Corridor in Reston **Report FAC/FCA-99**

Frederick A. Costello
August 14, 2013

Following are my comments on the draft plan.

A statement of funding principles is needed (Page 83). I favor "Funding shall be provided by the beneficiaries in proportion to their financial benefit." Also, "Financial feasibility shall be determined when the benefit exceeds the cost." These would be in contrast to something such as "Funding will be provided by County-wide taxes."

The proposed changes to the Comprehensive Plan include many numerical values. Numerical values are quite specific; therefore, they need justification. The numbers should not be chosen arbitrarily. For example, whether the quarter-mile should be measured from the platform or from the entranceway should be determined from data on the number of users of transit and how far they have walked. Bill Pennimen said there was data for Ballston. Data from other sites should be included. The numbers that need justification are:

Pages 5 and 14: "quarter mile": You need the decrease in ridership with distance from the platform and, separately, distance from the entranceway. This data will indicate whether the platform or the entranceway should be used.

Page 7: 2.5 jobs per household: We can justify 1.6 jobs per household for all new construction, because, theoretically, traffic would be unchanged. (We need data to show that 1.6 is the correct number.) The 2.5 might be justified if the traffic improvements (TDM, roads, transit, etc.) can be shown to offset the increase in traffic. Otherwise, the 2.5 must be justified financially by the cost of changes to the transportation system and benefits realized by the beneficiaries (who pay for the changes). (The current ratio for Reston should be given.)

Page 20: 30M gsf of commercial and 28000 residences can be justified by Scenario G. Reference should be made to the document that defines Scenario G. The high jobs-per-household that will result from these two figures may not agree with the 2.5 Reston average. A document must be referenced to show that these percentages are compatible with the Reston-wide goal.

Page 23: What is the justification for the numbers in Table 1 (WDU vs. FAR)? Are there estimates of how many WDU's are needed (and how many ADU's)? The County currently has no WDU's, yet the low-paying jobs are filled. The County has few ADU's as compared to the ADU goal, yet it has few homeless people. Will the developer's profit increase that results from the FAR increase cover the developer's loss from the WDU's and ADU's provided by the developer?

Page 27: 0.5 FAR bonus if infrastructure contributions are made: Why 0.5? How large must the contribution be to merit the 0.5 FAR increase?

Page 27: 60% of AMI for WDU occupants needs justification, especially because WDU's usually have 120% of AMI as the criterion.

Page 58: References are needed for the values in Table T2 on the effectiveness of TDM measures. Data must be cited for several similar sites.

Page 71: 75 dBA needs justification. Data are needed to show that 75 dBA is acceptable to people. In addition, the averaging procedure must be specified so compliance can be tested. (Do you average the dBA or the sound pressure? Over what time period do you compute the average?)

Pages 86 and 88: The percent commercial and percent residential needs identification (50% of GFA?). The percentages should be shown to be compatible with the Reston-wide goal of 2.5 jobs/household.

On Page 26, you favor, without justification, non-profit education institutions. The County should have no concern about the inner financial workings of organizations. For example, would you want to limit the maximum compensation that can be paid to people working in Reston buildings?

Some of the plan deals with aesthetics. Setback is one example. To make rational judgments on the aesthetics, we need examples, either photographs of existing places or perhaps architectural renderings. A video tour of examples would help. A three-dimensional computer model would be especially helpful. It would permit a virtual walk-through and provide many views. "World-class architecture" is too nebulous.

Separate reports could be used to present the justifications. The Comp Plan could reference the reports.

Several other suggested changes are listed in Appendix A.

Appendix A: Additional Comments

Page	Comments from Fred Costello on 07-29-13_v5_draft_plan_text_reston_tsas.pdf
5	To walk ½ mile requires 10 minutes, not 15.
8	The streets should also serve automobiles
9	"plazas connection" wording should be fixed
10	"over time it" should be "over time the rail corridor"
13	"These areawide" should be "The following area-wide"
13	Keep in mind that a gridwork of streets can be harmful to traffic flow due to intersections. A gridwork of walking and bicycle paths may be more appropriate.
18	Although previous paragraphs outline the future for subareas, Central Sunrise and Woodland paragraphs do not.
19	"and hotel"? Hotels should be counted as residences, commercial buildings, or not at all, depending on the impact on rush-hour traffic
23	Do you want to use the CPI, CPI-W, CPI-U, or … ?
29	This plan is to 2030, which is only 17 years from now, not the 20 years cited on this page.
31	Bicycles and pedestrians impede vehicular traffic, especially with many crosswalks. Should more walkways be used instead of streets? See also page 33, where small blocks are considered desirable.
31	The public-art funding source should be the developers, not county-wide taxpayers.
46	Trees also are effective, as an alternative to set-backs. Trees block the view of massive buildings. Storefronts can also be attractive distracters.
53	What fraction of the land will have buildings on it? Streets, walks, and open space will take up much space. Is the fraction compatible with the FAR's and the GFA's?
55	An analysis is needed of the transportation plan, including the bicycles, walkers, crosswalks, automobiles, buses, etc. Funding of public transit (buses) must be considered. Buses in New York City carry an average of 11 passengers.
59	Cost estimates are needed for the various transportation improvements.
59	A grid of (low-speed) streets, with many walkers and bicyclists, does not reduce congestion significantly.
62	A wider curb lane may also be required to accommodate buses.
64	The units must be specified in Table T3 (e.g., Per residential unit, Per 1000 sq.ft. of GFA).
67	Are the stormwater-handling techniques standard practice?