Reston ASSOCIATION

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August 16, 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: Consolidated Comments to Versions 1 through 5 of the DRAFT Comprehensive Plan Text for the Reston Transit Station Areas.

Dear Ms. Merkel:

The Reston Association (RA) acknowledges the efforts made by County Staff and Task Force members to incorporate the views of the Reston community. Now that the Plan Text is in the final stages of drafting as we approach the Planning Commission in October, the RA has, in this letter, merged all of its previous comments with new ones based on Version 5.

The following comments arise from two desired outcomes that RA members have voiced to the RA Board of Directors and staff regarding the master planning process: 1) keeping Reston's unique character, while at the same time, creating a distinctly urban area within the corridor; and, 2) minimizing adverse impacts on existing development and open space located within ½ mile of the station platforms, but outside of the commercial corridor.

Comments

1. The following sentence, taken from the Reston Association's "Welcome to Reston" publication, should be added at the end of paragraph one, page 5, 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*."

2. None of the Phase II area should be re-planned in Phase I (directly or indirectly). The Phase II area must be considered independently, without any predetermined increased redevelopment intensity arising from Transit Oriented Development (TOD) designation "circles" established in the Phase I effort. The current draft Plan has TOD circles encroaching into this Phase II area, with no clear, express caveat excluding these areas from higher intensity redevelopment. This caveat is clearly expressed in footnote #4 of the Phase 1 Task Force Report (p. 34, v7, 2-22-13), but is not as clear in the draft Comprehensive Plan Text. The hard edges of the Phase 1 study boundaries need to be reflected on all the Plan maps. The Transit Station Areas (TSA), TOD and non-TOD District Maps (shown on pages 4, 15 and 80) should be changed to show hard edges of the Phase I boundaries, not only for the TSA boundaries but also the TOD district "circles." This includes both the ¼ and ½ mile rings. None of these rings should be shown as extending beyond the Phase I Special Study boundaries into stable neighborhoods and existing open space. The latest version of the Conceptual Land Use Map (dated 8-13-13) shows the truncated rings correctly. All other maps should be changed in a similar manner.

   To further clarify that no new increased development is envisioned south of Sunrise Valley Drive, 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.79.

3. 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 on page 16 is strongly supported. Perhaps this TOD should be renamed, because the Reston Town Center does not and should not extend south of the Toll Road.

4. The section on **Development Review Performance Objectives** should provide for the provision of park, open space, and recreation amenities. Every new development should address the identified community priorities for park, open space, recreational, and cultural amenities. The Performance Objectives section of the Tysons Corner Urban Center Plan (p. 36) includes an objective for the provision for park and recreation amenities. Why doesn't the Reston Draft Plan have this? We suggest that the **Urban Park System Implementation** text should also be reflected in the section on **Development Review Performance Objectives**, pp. 21-24. A new bullet point objective should be added, as follows: "*New Development is encouraged to contribute to the provision of park, recreation, open space and cultural amenities in Reston, in accordance with the Service Level standards for the urban park system*."

5. The section on **Stormwater Management** should be carefully worded so as to not conflict with the new regulations, to be adopted before July 2014. Language concerning stormwater measures should be kept to a minimum since this is a thirty year document, which will need to be flexible to remain current with new technologies.

6. Preserving and protecting the natural environment is a key unifying feature of Reston. RA maintains a list of "banned" plants and "preferred" native plantings, which should be followed in all future development. A specific reference to these lists should be included under **Environmental Enhancement**. In addition, the term "*passive, non-programmed, common open space*" should be considered in replacement of the term "*common greens*" in the Parkland (local) section of **Table P1**. **Trails and Parkland** should be somehow highlighted as Reston area-wide priorities, separate from the other more site-specific facilities in **Table P1**.

7. A reference to "mature tree canopy" rather than merely "tree canopy" should be highlighted, in order to reinforce the preservation of existing trees, under **Environmental Stewardship** and **Tree Canopy Goals**. Where are the "priority forest areas" mentioned on page 53?

8. 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 14, **Transit Station Area Land Use Concept**, where it states that the TSAs are composed of both TOD and non-TOD areas).

9. Fish and aquatic plants should be added as an important feature of **Lakes and Ponds**, p. 69. In Reston, all water bodies are viewed as much more than just storm water ponds. Coordination of future development with RA should also be added to the **Lakes and Ponds** section. The RA is responsible for preserving both aquatic life and the continued stormwater management function of existing ponds/lakes. A reference to the "educational value" of water bodies in Reston should be added to the Stormwater Parks bullet point under **Linear Parks**, p. 79.

10. The existing wetlands bank along Sunrise Valley Drive in the **Herndon TOD District** is an important resource. A reference to "*maintaining public access*" to this resource should be included in the description of the **Herndon TOD District**, p.16. References to "*public access*", as well as, "*educational and passive recreational uses*" of this wetland should also be added to the description of **Wetlands**, p. 68. In addition, a statement should be added encouraging wetlands to be owned in fee simple or easement, by an agency/organization, such as RA, that would ensure perpetual stewardship and public access.

11. What purpose does the **Parks, Recreation and Culture map** on page 80 serve? It can be misconstrued to soften or contradict the use of the TSA boundaries as a hard edge/terminus for new increased development. We suggest that it be deleted or modified, similar to our suggestion #2.

12. We recommend that the jobs to households ratio objective in the Plan Text clearly state that it is merely an overall planning metric, which was used to ascertain the number of jobs and households in the Task Force's Preferred Development Scenario. The Plan Text should state that this ratio is not to be used to justify an increase in development intensities/densities above those contained in the District recommendations.

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"). This maximum amount of office space corresponds closely to the "Scenario E + Baseline" office development level proposed in Development Scenario G, updated 11-27-12 (hereinafter 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 Preferred Development Scenario and the draft Plan Text 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 (rounded to 28,000) in thirty years.

County staff estimates that this scenario will result in a jobs to households ratio within the corridor of 4:1. However, the jobs to households ratio objective in the proposed Plan Text is measured across the entire Reston community – i.e., both the Reston-Herndon Suburban Center sub-units included in the Phase I 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. We are concerned that staff previously opined that this equated to an overall "greater Reston" ratio of 3:1.

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?

If the jobs to housing ratio is clarified in the Plan Text as we recommend, the disagreement as to whether it should be 3:1 or 2.5:1 becomes moot. We believe that the jobs to households ratio used in the Plan Text should reflect only 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 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 must be restudied. Such restudies would delay implementation of the much awaited Plan Amendment.

13. The **Road Transportation Improvements** listed on page 59 should be closely reviewed and vetted amongst the greater Reston community. Attached is a map showing the location of these proposed changes to the road network. Context sensitive design and preserving natural vegetation road buffers should be emphasized in the Plan Text in order to lessen visual and environmental impact.

14. Pages 20-21. The Traffic Impact Analysis (TIA) determined significantly less development than is allowed by the Preferred Development Scenario – 3,373 less dwellings and 2,076,143 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 and allowed by the Plan Text. This undercounting is exacerbated by the fact that the Preferred Development Scenario does not count: (i) additional bonus residential densities allowed in the Plan (affordable and workforce housing); (ii) additional redevelopment within the corridor but outside the TODs; (iii) additional redevelopment which may arise in the Phase II Plan amendment; (iv) the 1/3 bonus intensity for institutional, ground floor retail and hotel uses; or, (v) the 0.5 FAR bonus within ¼ mile of the station platform (p. 27). These five (5) items will surely cause many more vehicle trips than were assumed in the TIA.

15. The proposed Plan Text on page 57 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 TIA seem to be worse than LOS "E." (See the attached LOS Map). We are concerned that more than 80% of the allowed development will be built. If so, at what level will the local road network perform?

16. Figure U7 on page 48 is not accurate. It should more accurately show the planned heights (up to 20 stories?) and the recommended street width to building base ratio. There should be no surprises to the community when development occurs.

17. In some locations, the reduced parking requirements for uses within ½ and ¼ mile of the station platforms may

result in parking encroachment into existing, stable neighborhoods. This should be addressed in the Plan Text.

18. For the Planned Development Commercial (PDC) and Planned Residential Mixed Use (PRM) zoning districts, substantial conformance to the type, character, intensity, and density recommended in the Comprehensive Plan is a zoning ordinance requirement rather than a guideline. See, Section 16-101.1 of the Zoning Ordinance. Therefore, in order to enforce a maximum height requirement, it must be in the Plan Text. Why are there are no height limitations in the draft Plan Text?

19. The inclusion of the phrase "5 to 15 minute walk" throughout the Plan Text should be removed altogether. The district maps and the ¼ to ½ mile rings are adequate to measure the limits of the TODs. The measurement of time it takes to walk simply adds confusion and lends itself to an interpretation that the rings could be enlarged or constricted.

20. The removal of language regarding the total amount of planned office development should be re-inserted into the Plan. This benchmark, along with other major intensity and density maximum levels of development shown in the Preferred Development Scenario (see comment #12), should be inserted in the Plan.

21. The removal of language regarding the monitoring of built and approved development should be re-inserted into the Plan. All development (existing, proposed and new) should be monitored and tabulated to ensure the proper balance between land use and transportation.

22. The section on **Urban Parks, Recreation Facilities and Cultural Facilities** is an appropriate location to also include the text on page 8, concerning incorporation of new development into RA or Reston Town Center Association (RTCA).

23. Page 56 discusses a modification of current Fairfax Connector Bus routes to feed the Metro stations. This section should be expanded to discuss whatever is needed to provide a reliable urban bus network for all of Reston – not just the feeder service to Metro. Expanded service should be mentioned, not just a modification of routes.

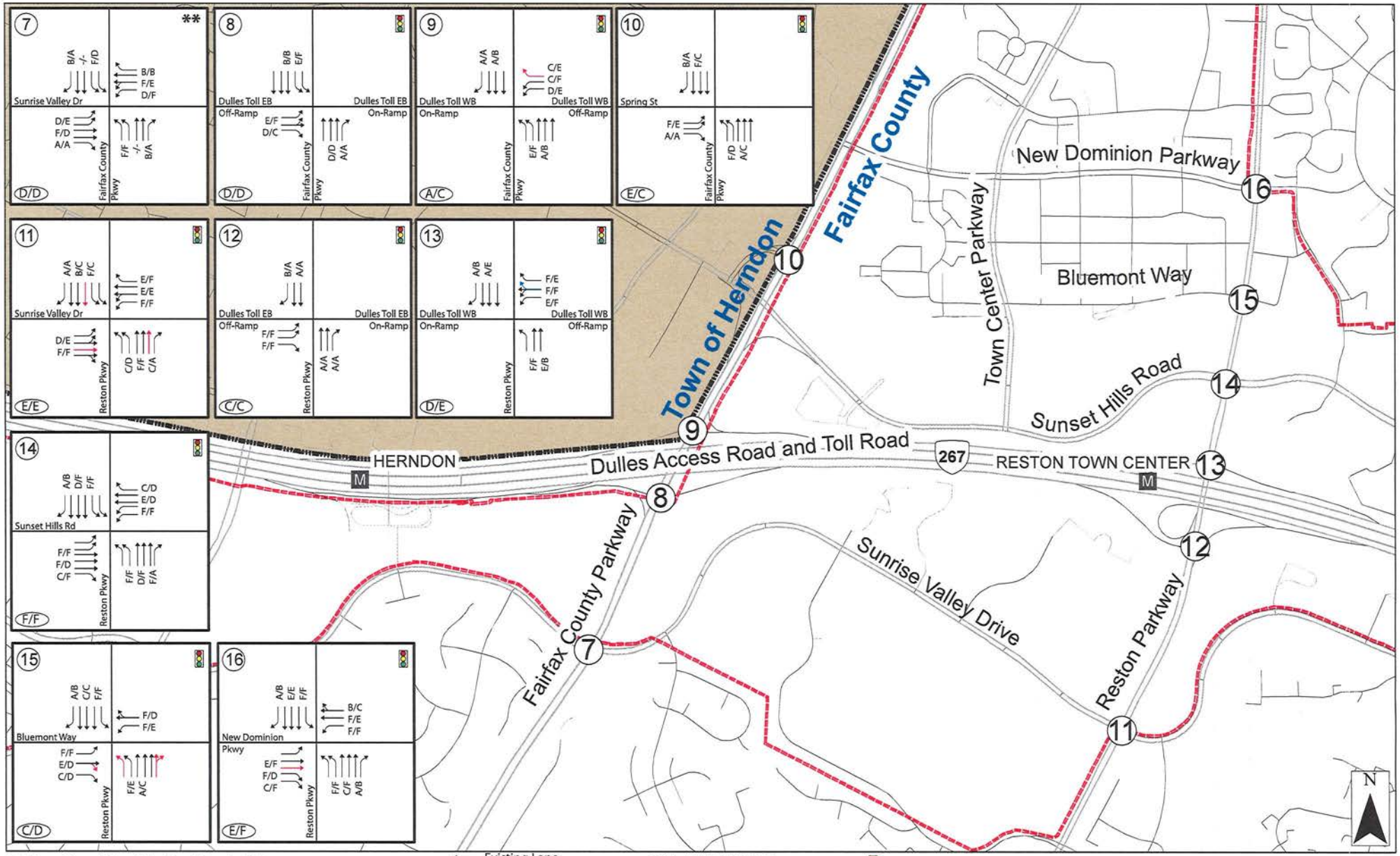
On behalf of RA, I want to thank you, in advance, for taking our recommendations and amendments to Version 5 of the draft Reston Transit Station Areas Comprehensive Plan Text into consideration. Please do not hesitate to call me at (703-203-2727) or e-mail me at BODKnueven@reston.org, if you have questions, 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



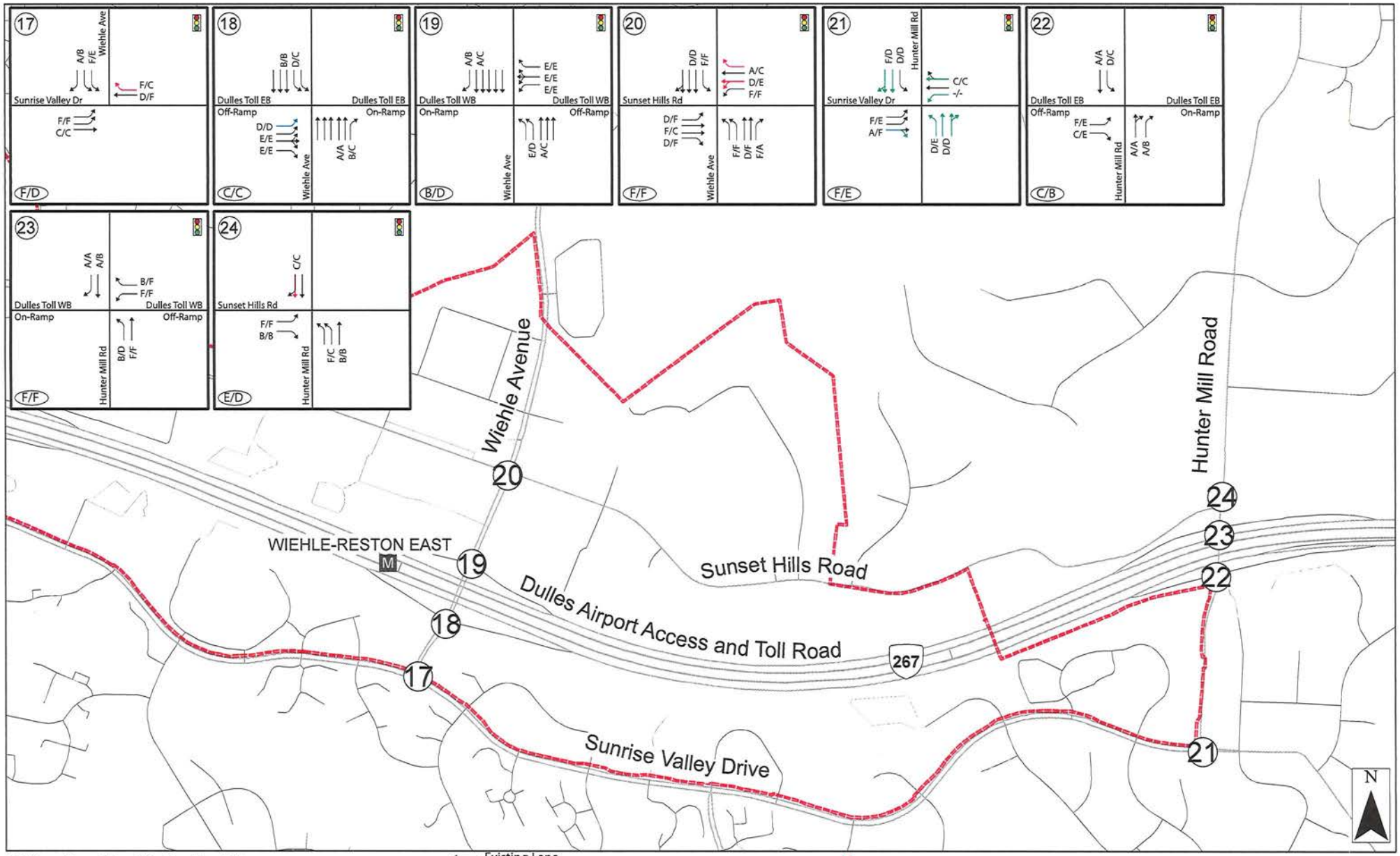
Dulles Corridor Study - Central Area
Scenario G Level of Service

Existing Lane
Comp Plan Improvement
Improvement by Other
Scenario G Improvement

x / x AM/PM Volume
(x / x) Overall Levels of Service
** Grade Separation Recommended at Intersection #7

Signalized Intersection
Dulles Corridor Study Area

Miles
0 0.25 0.5



Dulles Corridor Study - East Area
Scenario G Level of Service

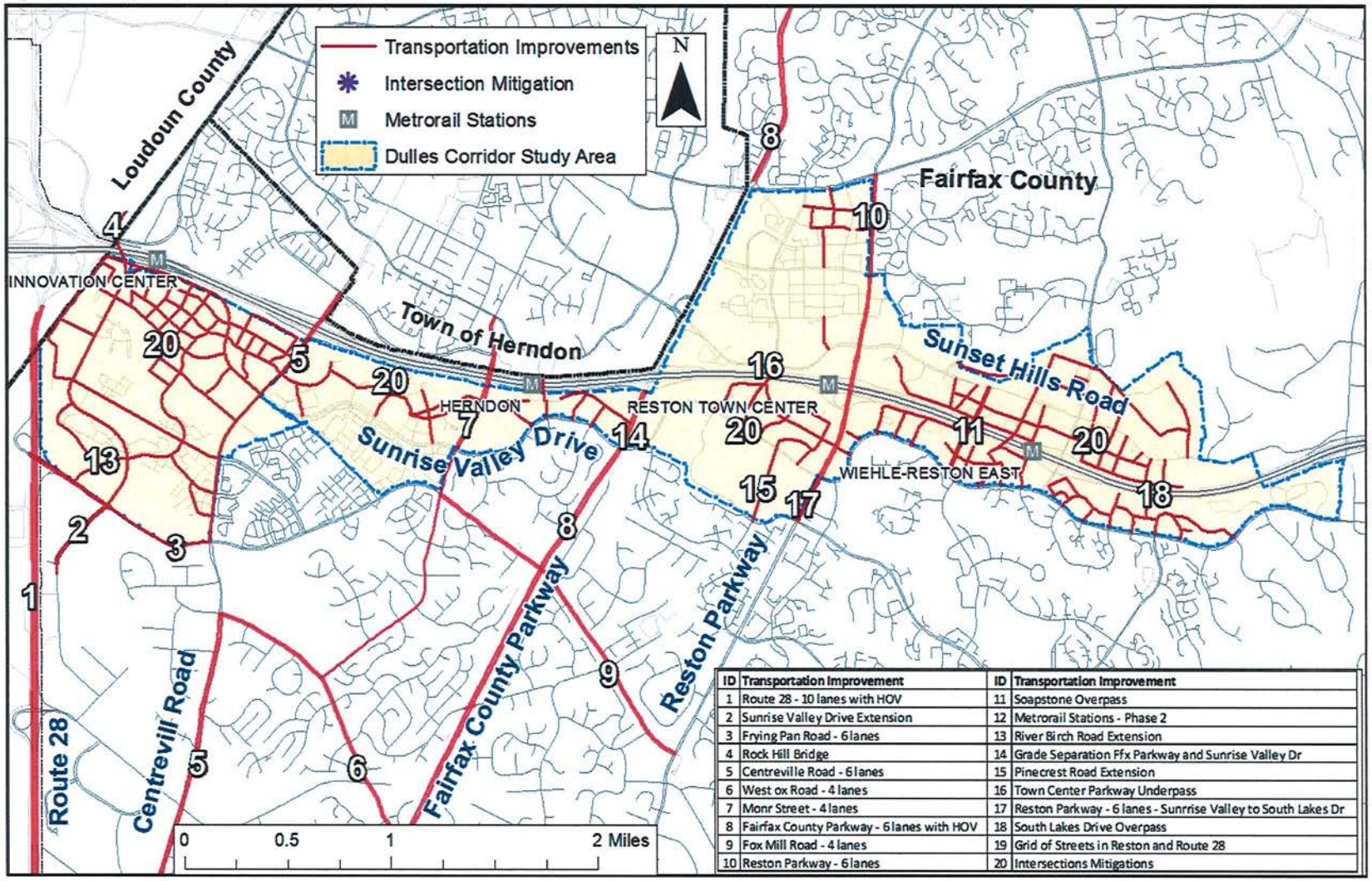
Existing Lane
Comp Plan Improvement
Improvement by Other
Scenario G Improvement

x / x Levels of Service
(x / x) Overall Levels of Service

Signalized Intersection
Dulles Corridor Study Area

Miles
0 0.25 0.5

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



ID	Transportation Improvement	ID	Transportation Improvement
1	Route 28 - 10 lanes with HOV	11	Soapstone Overpass
2	Sunrise Valley Drive Extension	12	Metrorail Stations - Phase 2
3	Frying Pan Road - 6 lanes	13	River Birch Road Extension
4	Rock Hill Bridge	14	Grade Separation Ffx Parkway and Sunrise Valley Dr
5	Centreville Road - 6 lanes	15	Pinecrest Road Extension
6	West ox Road - 4 lanes	16	Town Center Parkway Underpass
7	Monr Street - 4 lanes	17	Reston Parkway - 6 lanes - Sunrrise Valley to South Lakes Dr
8	Fairfax County Parkway - 6 lanes with HOV	18	South Lakes Drive Overpass
9	Fox Mill Road - 4 lanes	19	Grid of Streets in Reston and Route 28
10	Reston Parkway - 6 lanes	20	Intersections Mitigations