



## Reston Citizens Association

January 22, 2014

Dear Chairman Nicoson,

In the following paragraphs we provide our specific comments on the latest (January 10, 2014) draft Reston Task Force report as well as RCA's dissenting opinion on this report and the draft plan.

The following address specific major shortcomings we find in the draft report:

- **Open Space.** This report (p. 15) calls for a 20 percent “goal” of net lot area to be devoted to public open space as voted upon by the task force in lieu of earlier draft versions of the draft Reston plan that called the 20% a “minimum requirement.” [We believe at least a 20% minimum requirement is essential](#) to achieving a robust livable planned community as detailed in *Planning Principle #9: High quality public open space will be required* (p. 12). The same paragraph also calls for “flexibility” in applying this “goal” suggesting it could be located at a distance and reduced by “exceptional design and exceptional land dedication for public use.” We do not accept these “outs” to meeting the day-to-day open space needs of the transit station area residents, employees, and visitors.
  - As an adjunct to the preceding, we strongly believe a 20-acre or larger “central park” must be located in the Town Center North area consistent with the importance Restonians attach to open space, to serve the residents of the area, and to attract businesses, shoppers, and visitors to Reston’s central business district. We have proposed this on numerous occasions to the task force, including [Reston 2020’s alternative vision for the Town Center TSA](#).
  - We would also insist that the phrase “athletic fields” be added to the list of types of open spaces *everywhere* such a list of open space types exists in the task force report.
- **Density and Land Use Mix.** We do not agree with the draft report text stating that the “Reston-wide jobs to housing ratio will not increase from the current level of 2.55 (COG 8.2 2010).” (P. 17) We believe the current draft Plan text calling for a J:HH ratio goal of 2.5—a slight decrease—as

stated in the draft Plan is a preferable goal, is generally consistent with the development planning for the Phase 1 (TSAs) area, and appropriately keeps the J:HH goal at a single decimal level.

- **Oversized office space per worker assumption.** Directly related to the density issue is a topic not addressed here or, in fact, by the task force: The gross and growing inaccuracy of the assumption that office workers will require 300 GSF of space *each*. *Virtually every* available information source—academic, industry, journalistic—in the last two years has noted the trend to smaller office per worker. Globally, nationally, and locally the trend is toward about 100 usable SF per office worker or about 150 GSF per worker. In short, by the end of this decade, average space for new office workers could drop to 150 GSF and will most certainly not exceed 200 GSF per office worker. *If market conditions permit, this could result in up to twice as many workers in the allocated office space as are assumed by this draft plan—and the attendant massive adverse effects on [already LOS “F” traffic congestion](#) in the study area and beyond.*

The issue was discussed in depth in a series of letters RCA task force representative Terry Maynard wrote to the Board of Supervisors Chairman Bulova last summer and all copied to you, the Board, the Planning Commission, and DPZ. Please see these for additional details:

- [Maynard letter to Chairman Bulova, April 14, 2013](#)
- [Maynard letter to Chairman Bulova, May 24, 2013](#)
- [Maynard letter to Chairman Bulova, June 24, 2013](#)
- [Maynard letter to Chairman Bulova, July 9, 2013](#)

In this regard, we will note that County and US Census data show that the amount of leased office space in Fairfax County in 2012 (the last year for which complete data is available) shrunk by more than 970,000 GSF although County office employment increased by more than 4,700 people. *It is one of only two times in the past decade that occupied office space shrunk when employment increased; the other was in 2008 as the recession hit and companies tried to become more cost-efficient.* It reflects the downsizing of existing office space per worker to reduce operating costs, use new “open” working environments, and exploit the growth of teleworking. While additions to GFA may be expected, they will almost certainly be substantially smaller than the 300 GSF per office worker the draft Plan assumes and this report ignores. In fact, last year Arlington County cut its calculation of gross square feet per office worker for planning purposes from 250 GSF to 200 GSF, consistent with office industry trends.

- **Housing for All.** We agree with this principle, but believe we need to call for the greater availability of affordable housing in the TSAs. Specifically, the anticipated passage of [a Comprehensive Plan amendment allowing residential studio units \(RSUs\)](#) will offer housing opportunities to those who cannot pay the current minimum \$1,600 monthly rents in Reston Town Center, for example. We believe a percentage—the specific percentage to be determined—of all housing in Reston’s TSAs ought to be required—not “permitted” to use the draft amendment language—to meet the specifications of RSUs. This would be in addition to similar requirements for workforce housing.

That change would be consistent with Reston *Planning Principle #7: Housing will be provided for all ages and incomes.*

- **Athletic Fields.** The Parks & Recreation section (p. 20) of the draft report does not call for meeting the County’s staff-driven Urban Parks Framework requirement for athletic fields. Specifically, that framework calls for at least 12 athletic fields in Reston’s TSAs. The draft Plan calls for three as a minimum.

We believe the Task Force report must recommend that at least 12 athletic fields be located in the TSAs for the many thousands of children and active adults who will live in these areas. The Parks staff and the draft Plan suggest the added need can be met by “nearby” fields in Reston—and beyond, none within a ½ mile walking distance. As Restonians know well, those fields are over-subscribed now by Reston and other users, the hypothesized improvements in them will be offset by growth around Reston’s village centers (RTF Phase 2), and—in fact—the Park Authority staff has proposed reducing the number of “nearby” fields at Baron Cameron Park to [accommodate a recreation center in that park’s draft master plan](#) now under review. We believe at least 12 athletic fields should be distributed consistent with the population and employment in each TSA. The specific number of athletic fields for each TSA should be included in the “Open Space and Recreation” sub-sections of each TSA description for clarity.

- **Expand Pedestrian and Bike Access.** The draft report (p. 23, third bullet) recommends “Provide safe, signalized crossings of all roads leading to the stations, especially at major roads, such as Wiehle .....” We propose that this text read, “Provide safe, ~~signalized~~ crossings of all roads leading to the stations, ~~especially at~~ **including** grade-separated crossing at major roads, such as Wiehle....”
- **Parking.** We concur with the sentiment expressed in the opening bullet to establish maximum park levels for new construction. We would take this a step further and specifically recommend adoption of the standards laid out in **Table T3** of the fifth version of the draft master plan as presented below, which was subsequently removed at the insistence of developers on the task force. We would note that, without these restrictions, it will be virtually impossible to achieve the reduced VMT goals laid out in the task force report and generate even worse congestion (LOS “F” at all gateway intersections with multi-minute peak period traffic delays):

**Table T3  
Target Parking Rates for Areas within One Half Mile of Stations**

Use	Fairfax County Parking Requirement (as of 2013)	< ½ Mile From Metro	Optional 10% Reduction < ¼ Mile from Metro
		Target Parking Rate <sup>1</sup>	Target Parking Rate <sup>1</sup>
Residential or Lodging Unit			
Townhouses	2.7	2.0	1.8
Multifamily 0-1 Bedroom	1.6	1.3	1.2
Multifamily 2 Bedroom	1.6	1.5	1.4
Multifamily 3+ Bedroom	1.6	2.0	1.8
Hotel	1.08	1.08	1.0
Commercial Spaces/1,000 sq ft			
>125,000 sq ft	2.6	2.2	2.0
<125,000 sq ft	3.6	2.3	2.1
Retail	4.0-4.8	3.2-3.8 <sup>2</sup>	No minimum <sup>2</sup>

<sup>1</sup>The Target Parking Rate is a parking minimum.

<sup>2</sup>For uses not specifically listed above, the minimum parking space requirement set forth in sections 11-103, 11-104, 11-105 and 11-106 shall apply as follows: In TOD districts, the first 5,000 square feet of gross floor area located on the ground or street level for the following uses shall not be included in the calculation of required parking: personal/business services, fast food restaurant, quick service food store and/or eating establishment. Beyond 5,000 square feet, the minimum number of parking spaces required shall be based on 80% of the specified rates set forth in such Sections.

- **Address Levels of Congestion and Expand Capacity.** This section (pp. 26-27) addresses probably the most critical issue affecting local transportation and quality of life in Reston, but it does not call for the setting of a practical standard or goal. As we have proposed on multiple occasions, we believe the master plan should specify a goal of level of service (LOS) “E” for Reston’s gateway intersections near the Dulles Corridor along with its overall LOS “E” for the entirety of each TSA. In addition, the master plan must specify that these target LOS’s are for a traffic-weighted average weekday peak period for the more heavily trafficked peak period, morning or evening.
- **Recreation Center.** [Our extensive research on a Reston recreation Center](#) leads us to believe the only cost-effective place to locate a possible Reston indoor recreation center is in Town Center North as stated in the draft master plan going before the Board of Supervisors. Existing public park land is available at this location, it will be the primary locus for residential growth in Reston’s TSAs over the planning period, and it would reduce congestion and pollution caused by driving to a rec center beyond the TSAs. The following should be changed accordingly:

- P.9 calls for a recreation center “in the Study Area or other viable location.” This should state “in Town Center North.”
- In the table at the top of p. 22, the language calls for a large indoor recreation center to be located in the “Wiehle-Reston East Station area or other suitable location.” The notion of a recreation center in the Wiehle TSA was never discussed by the task force and we are amazed to find it in this draft task force report.
- **Design Review.** We believe that task force report should strongly support the language in the draft Plan that was dropped by the FCPC calling for all new construction to be reviewed by either the RTCA or RA design review processes as called for in the draft Plan as it was submitted to the Planning Commission. For reasons unknown, the Planning Commission stripped that phraseology from the draft Plan. It will be essential to assuring any sense of architectural excellence in the TSAs. At risk here is the creation of a new design review process (if any) comprising only landowners/ developers, such as existed with the RCIG Architectural Review Board (ARB). It was generally feckless in assuring architectural excellence as the current menagerie of buildings in the RCIG attests.

Since it is unlikely that the Reston Task Force will meet to adopt these (and other task force members’) proposed changes before the Board of Supervisors hearing on January 28, we respectfully dissent from this task force report based on the observations above.

We have also been highly critical of a number of other aspects of the draft Reston Master Plan. Our deep concerns (as well as our specific endorsements) are documented in the attached RCA resolution calling upon the RCA task force representative to vote against the draft plan and RCA’s report card on the draft plan.

We ask that this letter and its attachments be included as our dissent on the task force report.

Thank you for your consideration.

Respectfully submitted,

Terry Maynard  
RCA Representative  
Reston Master Plan Special Study Task Force



# Summary: Reston Master Plan Report Card

*Prepared by RCA Reston 2020 Committee for  
The RCA Board of Directors*

Section	Grade	Comments
Overview	<b>B</b>	Generally consistent with Bob Simon’s original vision and planning principles, but doesn’t identify “sustaining Reston’s quality of life” as a key principle and allows redevelopment in residential areas that aren’t “stable,” an undefined term.
Areawide Recommendations	<b>D</b>	Calls for mix of uses and keeps transit-related development with ½ mile of stations, but allows too much commercial development, too much flexibility, and sticks RA with the bill for parks & rec.
Urban Design & Placemaking	<b>B</b>	Provides detailed design guidance that promises attractive and walkable environment, but doesn’t provide any process for implementation.
Transportation	<b>D</b>	Encourages bike transit and “grid of streets” to relieve congestion, but overall traffic goals won’t prevent massive gridlock on key through streets, and no guidance on acquiring funding is provided.
Environmental Stewardship	<b>B</b>	Generally comprehensive in scope and detail and addresses RA’s key role, but could incorporate better LEED’s Neighborhood Development standard.
Urban Parks, Recreation, Culture	<b>F</b>	Abandons approved countywide standards, provides too little parks and rec space for new residents, increases burden on existing RA facilities, and limits County’s contribution to new park facilities.
Public Facilities	<b>C</b>	Provides generally reasonable recommendations for developing public services, but calls for a second elementary school near Dogwood, not Wiehle area.
Implementation	<b>F</b>	Provides no guidance on implementing any of the plan’s goals or objectives, or assuring compliance with plan’s constraints.
District Recommendations	<b>D</b>	Calls for a rec center at Town Center North, but provides no details on location and type of park facilities in station areas. Calls for only 3 athletic fields for 49,000 people in station areas.
Overall	<b>D</b>	

**Report Card on the  
Draft Reston Comprehensive Plan (Version 10)  
October 28, 2013**

The following report card provides a brief synopsis of the strengths and weaknesses of the various sections of the current draft Reston Master Plan as well as a weighted grade, A to F, for the section based on its importance in advancing Reston’s quality of life. The key criteria in assigning a grade are the impact the draft Plan language would have on the quality of life of Restonians, now and in the future, and the Plan’s consistency with Reston’s vision and values as a premier planned community.<sup>1</sup>

The standards for those grades are as follows:

- A = The section excels in meeting all Reston expectations for sustaining current and future Reston quality of life and Reston’s vision and values.
- B = The section meets most Reston expectations with some shortcomings.
- C = The section meets basic community standards but, on balance, neither exceeds or undermines Reston’s expectations.
- D = The section does not meet most Reston expectations, but meets at least some.
- F = The section meets virtually no expectations for sustaining Reston’s visions and values or Restonians’ quality of life.

This figure summarizes the grade results:

<b>Draft Reston Master Plan (Version 10) Report Card</b>				
<b>Section</b>	<b>Grade</b>	<b>Score (A=4, F=0)</b>	<b>Weight</b>	<b>Weighted Score</b>
Overview	B	3	5%	0.15
Areawide Recommendations	D	1	10%	0.10
Urban Design & Placemaking	B	3	10%	0.30
Transportation	D	1	15%	0.15
Environmental Stewardship	B	3	15%	0.45
Urban Parks, Recreation, Cultural	F	0	15%	0.00
Public Facilities	C	2	10%	0.20
Implementation	F	0	15%	0.00
District Recommendations	D	1	5%	0.05
<b>Overall</b>	<b>D</b>		<b>100%</b>	<b>1.40</b>

A one-page summary of this assessment is appended to this report.

<sup>1</sup> RCA Reston 2020 presented its understanding of Reston’s vision and values in a working group paper entitled [Proposed Planning Principles for Reston Master Plan Special Study, May 27, 2010.](#)

## **OVERVIEW (Weight: 5%, Grade: B)**

This is the introductory section to the entirety of the Reston Master Plan covering all of Reston, including the suburban areas that will be addressed in Phase 2 of the Reston Planning Task Force (RTF) effort. It provides the Vision and Planning Principles for the community as well as the Concept for Future Development (especially transit-oriented development (TOD) in the three transit station areas (TSAs).

### Strengths:

- The Concept of Future Development highlights the need for mixed use development in the TSAs.
- The Vision for Reston highlights the need to integrate into the existing Reston community, preserve open spaces, facilitate non-vehicular transportation, advance public art, and improve the TSAs' jobs:housing (J:HH) balance.
- The Vision Statement is generally consistent with Robert Simon's original vision for Reston.
- The Planning Principles are generally consistent with Robert Simon's original planning principles.

### Weaknesses:

- The Concept for Future Development fails to identify sustaining Reston's quality of life as a critical element of future development.
- The Planning Principles leave open the possibility of re-development of residential areas that are not "stable," a term that is undefined. This is unacceptable.

## **AREAWIDE RECOMMENDATIONS (Weight: 10%, Grade: D)**

This section introduces overarching guidance for development in the TSAs. Its guidance generally extends into the following topical sections as well as the district and sub-district level sections of the draft Plan. In general, the section's strength focuses on its consistency with the broader preceding Overview section. Its core weaknesses are its excessive focus on congestion creating commercial development, the notion of development flexibility (including easily obtained "bonus" density), relying on RA to provide park and recreation space and facilities for TSA residents, and a failure to identify mechanisms for phasing the development. Broadly speaking, it captures the range of strengths and weaknesses throughout the draft Plan.

### Strengths:

- The Land Use concept for the TSAs focuses on TOD with a broad mix of uses, a better Jobs:Households (J:HH) balance, pedestrian-friendly walkable communities, and a focusing of density and employment near Metrorail stations.

- The draft Plan makes a point of identifying “non-TOD districts”—generally beyond a half-mile from the nearest Metro station—in which further development is constrained.
- The draft Plan would keep J:HH ratio for Reston as a whole at about 2.5:1 and would reduce the current TSA gross J:HH imbalance of 14:1 to 4:1 if the Plan is executed as stated.
- The Development Review Performance Objectives provide reasonable guidance on Reston expectations for new projects consistent with the Planning Principles.
- Beyond the Performance Objectives above, the draft Plan calls upon developers to make other contributions to earn density bonuses.

Weaknesses:

- The two categories of land use concept—transit station mixed use and residential mixed use—over-emphasize the development commercial space relative to residential development, undermining the ability to achieve an even better J:HH balance that reduces congestion, environmental damage, and transportation infrastructure costs. A J:HH balance 1.6:1 is optimal.
- The notion of “flexibility” is introduced “*for a change of land uses within certain parameters.*” The parameters are not specified. In particular, it “encourages” retail and hotel uses unnecessarily. It virtually assures that the development balance goals of the Plan will not be achieved.
- The draft Plan calls on Reston Association (RA) “to meet a portion of the identified parks and recreation needs.” Although it also suggests RA membership for new residential development in the TSAs, the key message is that the County is unlikely to meet its core responsibility to provide space, facilities, or funding to meet Reston’s evolving parks and recreation needs. This is unacceptable.
- The draft Plan offers up to 0.5 FAR bonus density—increases above the stated development goals of 12-25% depending on the planned sub-district density overall density—makes it too easy for development proposals to earn density “bonuses” under the Development Review Performance Objectives. Developers should be required to meet several objectives to earn any bonus density and any density bonuses should be limited to the inner ¼-mile around the Metrorail station. In any case, the likely result of bonuses will be a reduced ability to meet the draft Plan’s critical J:HH mix goal.
- While the draft Plan calls for Phasing Development with transportation, public facilities, and site development, it identifies no means for assuring that phasing occurs.

**URBAN DESIGN AND PLACEMAKING (Weight: 10%, Grade: B)**

This section provides detailed guidance for the design of development in the TSAs, including streetscape design and building and site design recommendations, based on a sound vision and design principles. Its core weakness is that it does not specify how these expectations are to be achieved. The zoning approval process will be key in implementing these design goals.

### Strengths:

- Provides detailed guidance on the nature of acceptable design for streetscapes, building sites, and buildings themselves that promises a reasonably attractive, walkable, people-friendly environment.

### Weaknesses:

- No implementation mechanisms or processes are identified to assure that the design guidance in this section is achieved.

## **TRANSPORTATION (Weight: 15%, Grade: D)**

This section of the draft Plan provides guidance for development of the transportation infrastructure needed to support the development proposed. The sub-section on street improvements—the most critical transportation issue for Reston—is the most detailed and contains both this section’s greatest strength (identification of critical infrastructure needs, including Corridor crossovers) and its greatest weakness (an unacceptably low standard for traffic mobility, especially for through Reston traffic). The brief biking sub-section reflects the now pending County bicycle plan. The pedestrian and bus transit sub-sections provide no useful guidance.

### Strengths:

- The draft Plan highlights the need for a “grid of streets” in the TSAs, provision of three crossovers of the Dulles Corridor, and a grade-separate crossing at Sunrise Valley and Fairfax County Parkway.
- Several maps highlight proposed bicycle paths needed in the TSAs and the sub-section on street improvements indicates the need for bike lanes on some streets (“if found desirable”) and bike parking facilities along streets.
- The section provides reasonable goals (but no implementation guidance) on reducing vehicle trips, in part by reducing parking availability.
- The section notes the need to keep development and transportation infrastructure in balance.

### Weaknesses:

- The section says, “An overall Level of Service (LOS) ‘E’ is the goal for the intersections within the street network (in) Reston TSAs.” (LOS “E” means intersection delays of 55-80 seconds.) This “overall” goal does not define when this would occur (overall, weekdays, peak period, peak hour, etc.) whether it’s traffic-weighted, and so on. Moreover, it provides no assurance that Restonians will not confront multi-minute delays as FCDOT modeling results showed at each intersection in the TSAs on the key Reston Parkway and Wiehle Avenue north-south connections. It is essential that Reston traffic moving through the TSAs not be impeded unnecessarily by TSA traffic to help assure community-wide connectivity. This is unacceptable.

- The brief sub-section on funding transportation improvements provides no useful guidance on how this funding should be acquired. We estimate the transportation infrastructure costs called for in this draft Plan will exceed one billion dollars in 2013 dollars. Sound guidance is required.
- The pedestrian section does not propose the construction of pedestrian grade-separated crossings (bridges or tunnels) in the immediate Metrorail station vicinity, raising serious issues of pedestrian safety and, as a result, reluctance to use Metrorail.

#### **ENVIRONMENTAL STEWARDSHIP (Weight: 15%, Grade: B)**

This section provides reasonably complete guidance on protecting Reston’s environment in such areas as stormwater management, natural resource management (wetlands, streams and buffer areas, lakes and ponds, and environmental enhancement), tree canopy goals, green buildings, and noise impacts.

##### Strengths:

- The section is generally comprehensive in scope and detail, providing generally reasonable guidance on all key areas of environmental sustainability.
- It addresses most of the concerns about RA’s significant role in protecting the environment addressed in the recent joint RA-RCA-ARCH comment.

##### Weaknesses:

- The very limited Green Buildings section should be enhanced to incorporate the higher expectations of the totality of the LEED-Neighborhood Development (LEED-ND) standard. Reston has always been a leader in green development and it needs to achieve the highest feasible development standards going forward. LEED-ND provides a way forward.

#### **URBAN PARKS, RECREATION FACILITIES AND CULTURAL FACILITIES (Weight: 15%, Grade: F)**

This extensive section provides a detailed description of the County’s urban parks typology, including its limited park acreage standard, and a non-quantitative statement of Reston’s park, recreation, and cultural facility needs but provides virtually no guidance on what, where, when, and how to incorporate parks in TSA planning.

##### Strengths:

- The section describes Reston’s general parks, recreation, and cultural facility needs without quantifying or locating them. It also discusses the County’s basic urban parks typology in language basically taken from its Urban Parks Framework as they might be applied to Reston with so recommending.

### Weaknesses:

- The urban parks acreage standard assures residents, workers, and visitors to the TSAs will have access to about one-third the parks and recreation facilities found elsewhere in the County. (TSA residents would have access to about 84 acres of park space under the urban standard versus about 245 acres under the “suburban” standard using the projected population.)
- The draft Plan says, “*new residents should have access to and use of the full suite of amenities that the Reston planned community offers and in a manner similar to what existing residents currently enjoy. Reston Association is the primary provider of local-serving parks and recreational amenities, Reston Community Center offers an array of cultural and indoor recreational amenities, and the Fairfax County Park Authority provides broader-serving public parks and recreational amenities.*” (p. 94) An important implication of the preceding is that current RA members should allow the absorption of the 38,000 projected new TSA residents into already well-used existing RA park and recreation facilities. At the same time, the draft language tries to distance the County from its responsibility to provide any local park and recreation space, facilities, or services. This is unacceptable. The citizens of Reston deserve the same County commitment to local parks and recreation as the rest of the County receives. We pay for those services; we should receive them locally as well.

### **PUBLIC FACILITIES (Weight: 10%, Grade: C)**

This section discusses the other public entities that will be required to meet the needs of growth in Reston’s TSAs. It calls for several new schools, a new fire/rescue station in North Town Center, and a renovated and expanded library.

### Strengths:

- The draft Plan acknowledges that additional critical public services will be needed and provides generally reasonable proposals for their development in concert with the TSA development.

### Weaknesses:

- For reasons that are unclear, the draft Plan calls for the second elementary school to be built in the Central Sunrise Valley District less than a quarter mile from Dogwood ES whereas the Wiehle North area, a focal point for early residential mixed-use development, will be more than a mile from the nearest elementary school. (Note: The first elementary school is proposed for Town Center North, an area planned for relatively intense residential development.)

### **IMPLEMENTATION (Weight: 15%, Grade: F)**

This two-page section describes generic funding strategies and the current basic regulatory framework for implementing the entirety of this 141-page plan.

Strengths:

- None

Weaknesses:

- This section provides no guidance on implementing any of the goals or objectives nor assuring compliance with the constraints detailed in this draft Plan. It merely describes established options.

***“Planning without Implementation is Empty.”***

--Title of RCA paper on the importance of implementation

**DISTRICT RECOMMENDATIONS (Weight: 5%, Grade: D)**

This section is sub-divided into sections that look at the twelve districts and their sub-districts within the scope of the Phase 1 draft Plan. In general, the guidance within these sections applies the guidance in the areawide discussion while developing the unique character of each of the three TSAs. Our few comments focus on specific elements in several districts and sub-districts. These comments focus on the shortcomings in assuring Restonians living in the TSAs reasonable access to park and recreation amenities.

Strengths:

- The draft Plan calls for a recreation center to be built in Town Center North.

Weaknesses:

- In every district/subdistrict (as well as the Urban Parks section above), the draft Plan language states, “The exact number of urban parks and other amenities, their sizes and distribution will be determined by the amount and type of new development and provided in accordance with the guidance in the Urban Parks, Recreation Facilities and Cultural Facilities section.” This is an explicit plan not to plan ahead for needed parks and other amenities in direct contradiction of the Plan to recommend the development of all key infrastructure consistent with the level of anticipated development. This is unacceptable.
- In total, the three TSAs are proposed to include three new athletic fields to serve 49,000 residents whereas the “Countywide Adopted Service Level Standards” would require 35 athletic fields of various types to serve that many residents. This is unacceptable.