

October 28, 2013

THE JBG COMPANIES®

Fred Seldon  
Fairfax County Department of Planning  
12055 Government Center Parkway, Suite 730  
Fairfax, VA 22030

**Re: Reston Transit Station Areas Version 10 DRAFT Comprehensive Plan Text**

Dear Fred:

As you know The JBG Companies owns several properties along the Toll Road Corridor in Reston and, as such, have a large stake in the new Comprehensive Plan for the Reston Transit Station Areas. While we are pleased with the progress of the progress that County Staff and the Task Force has made, we have several comments and concerns regarding the Version 10 Draft dated 10/24/13. At this point, we cannot support the Plan text as drafted. Our comments are as follows:

A major concern is the Calculation of Public Open Space as a percentage. A threshold as a percentage (20%) has absolutely no correlation to the quality of open space. Further, specific targets will likely have the opposite effect by limiting the ability for a site to create well-programmed quality open space in exchange for more space for the sake of hitting a target. We propose the language on public open space attached as Exhibit A.

Additionally, we are concerned with the current recommendations for a tiered approach to parking maximums. While we support parking maximums, providing sites outside of ¼ mile to Metro the ability to offer more parking provides those sites a strategic advantage in obtaining commercial leases. As a result, the tiered (2.1 ratio inside ¼ mile, 2.4 outside) acts to discourage Metro proximate development, and encourage development further from Metro. We strongly recommend that the maximum be universally applied at 2.4/1000 GSF irrespective of distance from Metro.

**Urban Design Comments:**

- On page 30, in the Urban Design Principles section, we recommend adding another principle called "Foster Walkability" with the following bullet points:
  - Reduce lane widths, and refuge, and slow traffic to provide for safe pedestrian crossing.
  - Line roads with trees and on-street parking to make walking seem safe.
- On page 30, in the Design Sustainable Environments section, please add a bullet point encouraging the retrofit of existing stormwater systems to improve quality and reduce quantity.
- On pages 31, final paragraph, second sentence, we recommend the mid-block crossing threshold 400 feet instead of 600 feet.
- On page 31, in the Pedestrian Realm Recommendations section, second paragraph, final sentence, consider addressing private areas such as outdoor dining areas when discussing elements of the pedestrian realm.
- Page 53, publicly accessible open space threshold is too high. We recommend alternative language as noted previously.

**Transportation Comments:**

- On page 60, in the Road Network and Circulation section, first paragraph, second sentence, strike "right-of-way" and insert "or existing streets are narrowed/ reconfigured, plans".

- On page 60, in the Network Level of Service section, in the development review process sequence, we recommend adding options such as narrow lanes, add pedestrian refuge area, and single or multiple intersection retiming and sequencing.
- On page 62, in the Road Transportation Improvements section, sixth bullet point, we recommend revising "6 lanes" to "4 lanes".
- On page 62, in the Road Transportation Improvements section, we recommend including an additional bullet point stating: "Reduce street widths to accommodate pedestrian walkways on either side of road and to encourage safer street crossings."
- On page 66 & 67 in the Minor Arterial A & B, we recommend an additional bullet point for each section: "Add trees to medians to promote slower traffic, better tree cover, and pedestrian safety."
- Page 68, Parking Management. Parking maximums should be universal so as to not discourage Metro development as noted previously.

**Stormwater Management Concerns:**

The Stormwater Management policy on page 70 calls for regulation based off the Floor Area Ratio. The Commonwealth of Virginia is in the midst of updating the statewide stormwater quantity and control regulations based on 3 years of public and private sector expert input. This plan is scheduled to be implemented July 1, 2014. Given the statewide update, it is unnecessary to discuss stormwater management regulations and practices in the Comprehensive Plan, given the Site Plan process ensures that each development conforms to the Virginia Stormwater Management Regulation. Further, including language in an area plan almost assures conflict between Comp Plan language and language from the ordinance.

Absent complete deletion, the following are our specific comments:

- Increased density does not impact stormwater quantity and quality, thus stormwater mitigation should not be evaluated based on site FAR. We recommend that the language on page 69-70 be revised such that the level of storm water mitigation is tied to the individual characteristics of a site rather than density.
- In regards to the Wetlands section on page 71 please consider replacing the 3<sup>rd</sup> sentence with "The Transit Oriented Development (TOD) adjacent to the Herndon Station shall comply with the federal wetlands regulations and strive to maintain the mitigation site established by Reston Land Corporation in July 1994."

**Tree Canopy and Noise Management:**

- On page 72, in the Tree Canopy Goals section, we recommend the addition of language supporting trees in medians. This will help the tree canopy efforts area wide.
- On page 73, in the Noise Impacts section, first sentence, strike "against" and insert "that special care be taken for". ("The Policy Plan recommends that special care be taken for new residential development. ...")
- Given the new development patterns expected along the Toll Road, the Comp Plan should acknowledge that building setback requirements along the Toll Road should be relaxed so long as noise mitigation methods are adhered to.

Best regards,



Greg Trimmer  
Principal/  
The JBG Companies

## Exhibit A

### *Publicly Accessible Open Space*

High quality open spaces of all types provide opportunities for spontaneous interaction and programmed activities as well as for introducing variability in the fabric of the built-environment. A variety of large and small publicly accessible open spaces should be available throughout the Reston community.

In some instances, such open spaces can be sited so as preserve, augment and/or enhance the natural environment. In certain parts of Reston's TSAs, opportunities to preserve areas with existing trees should be sought to help connect these more urban areas to the larger fabric of Reston.

### *Definition of Publicly Accessible Open Space*

For the purposes of this Plan, these spaces are to be for public enjoyment and may be either publicly or privately owned space to which public access is granted. They may include:

- environmentally sensitive areas, such as Resource Protection Areas (including wetlands, streams and stream buffers) and existing stands of trees;
- active recreation areas, such as large active play fields and smaller outdoor recreation areas for activities such as tennis and volleyball;
- designated privately owned, publicly-accessible open spaces, such as gardens, plazas, walkways, pathways, trails, urban parks, through-block connections, civic spaces, town squares, and a memorial sculpture garden; and
- other publicly owned and publicly accessible open spaces including small urban parks and civic spaces.

Publicly accessible open spaces do not include streets, parking and driveways or areas for vehicles, unless these areas can be closed and programmed for public use (e.g. street fairs or farmer's markets) sidewalk widths that are less than 12 feet wide, and roof top areas not readily accessible to the public. In some instances, publicly accessible open space may need to be identified by a wayfinding sign.

### *Calculation of Publicly Accessible Open Space*

The following guidelines apply when considering the total amount of publicly accessible open space to be provided by any given project:

- The minimum open space should be 20 percent of the net lot area (total lot area not including areas for public or private streets and ~~12 feet of the sidewalk area~~ unless they are designed to be able to be closed and used as public space). Flexibility in location should be used in applying this minimum, recognizing that smaller open spaces are more appropriate and are generally used and enjoyed in the highest density areas. Some portions of the 20 percent minimum may be more readily located in the immediate proximity of the transit station areas or be made up by adjacent publicly owned adjacent accessible open space so long as the project provides for pedestrian connections to the space (e.g. the portion of the WO&D trail that runs along the frontage of a property).
- The minimum publicly accessible open space requirement for each parcel may be met by open space located off-site and combined with other properties within the TSA to create larger public spaces (e.g. the proposed large civic green in the South TOD area of the Town Center TSA and the proposed green, linear park along Sunrise Valley Drive).
- Publicly accessible open space may include active space such as an outdoor performance space, active recreation fields, public parks, and a memorial sculpture garden.