

Boston Properties' Comments on DRAFT Comprehensive Plan Text

October 28th, 2013

1. Eliminate the requirement to provide 20% of a project's net site area as "publicly accessible open space", as well as the application of the County's "Urban Parks Standard" in favor of encouraging the creative provision of usable open spaces and both active and passive recreation zones for residents, employees, and visitors. These two standards and their rigid application are counter to creating the kind of urban developments that are desired in close proximity to the future TSA's in the Dulles Corridor. 20%, especially as defined, is not an urban open space standard. Similarly, and perhaps more poignantly, the application of what is referred to as an urban parks standard (but which is actually much more suburban in nature) to a dense development of the kind expected/desired in the TSA's would result in as much as one third of the gross site area being reserved for park space. While open/park space is a critical component of project design in creating vibrant, livable urban places, the referenced standards will make that exceedingly difficult to accomplish and will serve to discourage otherwise highly desirable developments and/or redevelopments.
2. Remove all references to specific stormwater management standards in favor of referring to the pending Virginia Stormwater Management Regulations and/or the County's Policy Plan, as the Comprehensive Plan is an inappropriate forum to introduce such an additional standard. Please also reference Mark Looney's comments on this section of the Plan text, which I echo but will avoid restating.
3. Remove all references to future developments' membership in a specific or any single property association in Reston. The Comprehensive Plan is an inappropriate vehicle to attempt to legislate, or even recommend, association membership in Reston.
4. Remove all references to future development being subject to any design review board, but specifically the RA DRB. The County's onerous and detailed design review process stands alone in the vast majority of the County and is sufficient for Reston. Further, if former RCIG areas were to be subject to additional design review at all, the RTCA DRB would be a far more appropriate venue to review TOD developments, given its past review of Reston Town Center's more urban-style and denser developments than exist in any part of the RA DRB's jurisdiction.
5. Remove reference to Staff's proposed language on encouraging retail and hotel development in the TSA's in favor of the Task Force's position. This debate is really about the peak hour trip generation profiles of the various uses. Since retail space and hotel rooms (not meeting space) have entirely different peak hour trip generation profiles than both office and residential, they should rightly be excluded from both FAR calculations as well as the determination of the appropriate mix (they would be

considered in traffic analyses). Finally, with respect to the stated goal of encouraging hotel and retail development (which is absolutely necessary, especially with retail), deducting these uses from the available commercial development potential on a site is counter productive, and isn't necessary in relation to the traffic analysis.

6. Remove office parking maximums. Developers are already motivated – by profitability of their developments – to build as little parking as can reasonably be built in order to efficiently and effectively run their projects, and we have legitimate concerns as to whether the stated maximums will be sufficient to lease office space in the TSA's (in both the short and long terms). TDM requirements will achieve trip reduction goals without being prescriptive as to a single method for implementation, but will still allow developers the flexibility to creatively meet the needs of their projects.
7. Either eliminate or provide a strong introduction to the “Building and Site Design Recommendations” section that states that nothing in the section is intended to be prescriptive or applied blindly to all developments. Attempting to achieve good architecture by requiring certain types of embellishments like so-called “step-backs” is exceedingly difficult and short-sighted, and really has no place in the Comprehensive Plan.
8. Part A: State that the LEED Silver requirement for commercial developments refers to the LEED standards as of the date of adoption of the Comp Plan language. LEED Silver is an appropriate standard today, but substantial risk lies in the future evolution of the LEED ratings. As more and more aspects of environmentally sustainable design become the norm, it will likely take more and more dramatic (and costly) efforts to achieve the various ratings under the LEED system. It is simply too difficult to predict what achieving the LEED Silver designation will require in 2020 or 2030, yet this Plan language would require that. Part B: Provide the flexibility that a development can be designed to achieve LEED Silver, but not actually submit for and/or achieve it. The LEED submission fees and consultant costs to achieve a LEED rating are substantial and are not always supported by the project's economics. Secondly, LEED implementation provides the real possibility that a project could far exceed the necessary points for a certain rating, but not achieve the rating based on a technicality. This should not be viewed as a failure to achieve the requirement. General: Requiring a LEED standard should not – even unintentionally – impose undue hardships or cause otherwise desirable developments to become economically infeasible.