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**From:** Forno, Russ

**Sent:** Monday, October 28, 2013 3:18 PM

**To:** Darab, Faheem; Merkel, Heidi T.

**Subject:** JOINT RCA/RA/ARCH Version 10 comments

Heidi and Faheem,

Please see attached...

**Mobile:** 703-589-3582



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October 28, 2013

Ms. Heidi T. Merkel, AICP  
Senior Planner, Fairfax County Department of Planning & Zoning  
Planning Division, Suite 730  
10255 Government Center Parkway  
Fairfax, VA 22035-5505

**RE:** Joint Reston Association (RA), Reston Citizens Association (RCA), & Alliance of Reston Clusters and Homeowners (ARCH) Comments on Version 10 ("dated" 10-29-13) of the DRAFT Comprehensive Plan Text for the Reston Transit Station Areas.

Dear Ms. Merkel:

Although the Plan text continues to improve with each subsequent version, we are concerned that various components still need to be adequately addressed. In five of the six principles below, we list specific changes that we believe should be made to the Version 9 draft Plan text.

**1. Sustaining Reston:** We believe that Reston is one integrated community that includes all of the land within the Transit Station Areas. It is not two communities separated by the DAAR corridor. In order to integrate new development into the fabric of Reston, all new development should be incorporated into either RA or RTCA, according to their agreed upon membership boundaries.

This principle has been addressed in the Plan text.

**2. Environmental Sustainability:** Consistent with Reston's history of forward thinking on environmental stewardship and sustainability, we believe that future development in Reston should meet the highest feasible environmental standards, ranging from the protection or restoration of natural amenities, to the use of the best environmental practices in development design and materials.

This principle has been addressed in the Plan text.

**3. Flexibility:** We appreciate the need for moderate flexibility in planning over a two-decade timeframe, but we do not support Plan language that would allow significant variation or increase from the density/intensity and land use mix objectives laid out in the Preferred Development Scenario (Scenario G).

a. The Plan Text should be amended on **page 21** to replace the word "above" with the word "herein" in the last sentence of the third paragraph. We believe that the Plan should reflect "maximum" rather than "target" development levels (**Page 21**).

b. The 0.5 FAR "bonus" development intensity (**page 26**) should be allowed only within ¼ mile of a Metro Station platform. Furthermore, achieving a minimum of only two "additional development objectives" to warrant this "bonus" is too low a threshold. Objections numbered two and four are simply too easy to meet. Satisfying a minimum of three (3) "additional development objectives" should be the threshold. Unless the draft text is changed, the Preferred Development Scenario will be exceeded through the award of "bonuses," without receiving significant infrastructure in return, resulting in an imbalance between land use and the public infrastructure needed to support it.

c. In the new Planned Development Commercial (PDC) and Planned Residential Mixed Use (PRM) zonings, substantial conformance to the type, character, intensity, and density recommended in the Comprehensive Plan, is a zoning ordinance requirement rather than merely 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 no building height limitations in the draft Plan Text (**page 51**)? Specific maximum heights, especially outside the TODs, are an important urban design tool that helps ensure that development "fits in" to existing neighborhoods. The building height guidelines contained on **pages 51 and 53** are not enough guidance for the Non-TOD areas.

**4. Open Spaces, Parks, & Recreation:** In order to sustain Reston's existing character and reputation as a model planned community, we believe the new Comprehensive Plan must assure the provision of adequate high-quality, publically accessible open space, parks, natural areas, and recreational facilities within the Phase 1 area, to accommodate Reston's residents and employees.

a. Revise the final sentence in **Planning Principle 9, High quality public open spaces will be required (page 13)**: “New additional active recreation facilities (indoor and outdoor), appropriate to Reston’s residential and commercial populations, should be provided.” The way it is currently written in the Plan text is in direct conflict with the language contained in the sections on **URBAN PARKS, RECREATION FACILITIES AND CULTURAL FACILITIES** and **DISTRICT RECOMMENDATIONS**.

b. We agree with the recommendations of the Park Authority in its October 1, 2013 memorandum, where it states “Comprehensive Plan language should recommend construction of new athletic fields within the study area with a preference for new field locations within or near each TSA.” We believe, however, that when new athletic field locations within the TSAs are not possible, they should be within walking distance (1/2-mile or 10 minutes) of the transit station areas and they should not supplant existing open space, park, or recreation space or facility uses. Language to this effect should be inserted into the Plan text. The **Development Review Performance Objective** concerning urban parks and other recreational amenities(**top of pages 22-23**) should accordingly read: “Although the exact number of parks, their individual features, facilities, and locations are not specifically determinable at this time, every effort should be made to meet at least the minimum requirements for park land space and facilities/features as applied to the Preferred Development Scenario under the Urban Parks Framework and the adopted Countywide service level standards established for park facilities (p. 21) identified in the **Fairfax County Comprehensive Plan, Parks and Recreation Policy Plan**. This space and related facilities should be distributed pro rata within each specific transit station area.”

c. Consistent with Point 4.C above, within each of the **DISTRICT RECOMMENDATIONS** (Wiehle-Reston East TSA—**page 88**, Wiehle-South Subdistrict—**page 92**, Reston East District—**page 93**, Reston Town Center TSA—**page 96**, Town Center North Subdistrict—**page 100**, Town Center South Subdistrict—**page 101**, West Fountain Drive Subdistrict—**page 104**, East Fountain Drive Subdistrict—**page 106**, Town Center West District—**page 107**, Central Sunrise Valley District—**page 112**, Herndon TSA—**page 114**, and Herndon Station TOD—**page 114**, Woodland Park Subdistrict—**page 117**), the vague language in the following sentence needs to be strengthened: “The exact number of urban parks, their sizes and distribution will be determined by the amount and type of new development, in accordance with the Urban Parks Framework in the Policy Plan.” In its place, the following sentence should be entered: “Although the exact number of parks, their sizes, facilities, and distribution cannot be specifically identified now, their development should be guided by the Urban Parks Framework and the adopted Countywide service level standards established for park facilities (p. 21) in the **Fairfax County Parks and Recreation Policy Plan**, as applied to the Preferred Development Scenario for the transit station area as a minimum expectation.”

d. The last sentence on **page 76 active recreation facilities** should be amended to read as follows: Due to the size requirement for some full-size athletic fields, the provision of these fields may be particularly challenging in the urban context, but are essential where new fields and expanded capacity at existing facilities are not sufficient to serve the new planned development.

e. The newly added sentence on p. 76 beginning “Adjusted service level standards for athletic fields...” needs to be dropped.

f. The newly added sub-section on “Active Recreational Facilities” needs significant adjustment to reflect the County’s commitment to its adopted athletic field standards in the Parks & Recreation Policy Plan. In particular:

1. In the first paragraph:
  - a. In lieu of the second sentence (beginning “Plan guidance...”), the following sentence should be substituted: “Although the exact number of athletic fields, their sizes, and distribution cannot be specifically identified now, planning for their development should be guided by the Urban Parks Framework and the adopted Countywide service level standards established for park facilities (p. 21) in the **Fairfax County Parks and Recreation Policy Plan**, as applied to the Preferred Development Scenario for the transit station area as a minimum expectation.”
  - b. Drop the phrase “adjusted for urban demographics and use patterns” from the fourth sentence.
2. In the second paragraph, top of p. 78:

- a. The first sentence should read: “A goal of adding capacity equivalent to **twenty-five** athletic fields **servicing Reston’s station areas, consistent with adopted Countywide standards on a net basis**, should be achieved through development contributions of land and/or facilities.
- b. The second sentence re 4.5 million square feet of development per athletic field should be dropped. It is not an approved County standard.
- c. The third sentence should read: “Therefore, at least ten new fields should be added to both the Reston Town Center and Wiehle station areas and five should be added to the Herndon station area consistent with adopted County standards and Reston’s needs.”

5. **Mobility:** We believe the people of Reston must have reasonable cross-community driving, biking and walking conditions, especially during peak periods, both within and near the Phase 1 area. The Transportation Study states that Metro will accommodate less than 10 percent of commuting trips. Therefore, the following are crucial to maintain a balance between land use and transportation: (1) Road, bicycle, pedestrian and bus transit improvements; (2) transportation demand management (TDM) measures; and (3) adherence to the Preferred Development Scenario's mix of uses and maximum level of development cap.

a. **Planning principle 8** on **page 12**, should clearly state multi-modal mobility.

b. VDOT's review of the Fairfax County Transportation Study states “monitoring and phasing of future development as the transit-oriented development (TOD) areas and surrounding areas develop is essential to assure an ongoing balance between transportation services and travel demand.” The Plan text on pages 11 (**planning principles 3. Development will be phased with infrastructure**), 27 and 55 (**land use/transportation balance and monitoring system**) is strongly supported.

c. The Traffic Impact Analysis (TIA) analyzed 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 extremely concerned that this undercounting will result in a misrepresentation of the traffic impacts to the Reston road network from the level of development allowed by the Plan text. It is likely that more than 80% of the allowed level of development will be built. If so, at what level will the local road network perform? This 80 percent 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 village centers from the Phase II Plan amendment; (iv) the 1/4 bonus intensity for institutional, ground floor retail and hotel uses); or, (v) the 0.5 FAR bonus within a TOD district. These five uncounted “bonus” development levels will surely result in many more vehicle trips than were assumed in the TIA. Land use and transportation will become unbalanced; even if all the recommended transportation improvements are completed!

d. The Plan text in the **network level of service** section on page 60 should explain how this “overall” rating of LOS “E” is calculated. Is it an average? We share VDOT's concern that most of the individual intersection ratings r contained in the TIA appear worse than LOS “E.” If so, how can an overall goal of LOS “E” be met? We firmly believe that the second sentence of this section should state a goal of attaining a Level of Service (LOS) "E" or better at the gateway intersections of Sunrise Valley Drive and Sunset Hills Drive with the Fairfax County Parkway, Reston Parkway and Wiehle Avenue. The Level of Service at these six gateway intersections is crucial to the network level of service and cannot be "averaged."

e. The Plan text on **page 33**, which discusses pedestrian crossings, should also mention that “At major roadway intersections closest to Metrorail stations, grade separated crossings offer the safest and most congestion-reducing way to accommodate the large number of pedestrians and bicyclists accessing Metrorail.” This is important because the County's response to VDOT comments admits that the signal timing used in its traffic analysis did not allow for sufficient pedestrian crossing phasing.

**6. Implementation:** We believe the people of Reston must have strong guarantees that the infrastructure needed to support the increased level of development and continue Reston's high quality of life, will be completed concurrently with development, and is paid for, on a fair, pro rata basis, by those who will profit from the development.

a. The text of the **Funding of Transportation Improvements and Services** section (**page 69**), needs to more clearly state these Implementation principles. The Plan text should clearly state that infrastructure identified as necessary to support specific level of increased development should be put in place before or concurrently with such redevelopment and paid for on a fair, pro rata basis by those who will gain financially from it.

On Behalf of the Board of Directors of Reston Association,

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Ken Knueven, President

On Behalf of the Board of Directors of the Reston Citizens Association

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Colin Mills, President

On Behalf of the Board of Directors of the Alliance of Reston Clusters and Homeowners

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Gerald Volloy, 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

Paul J. Kraucunas, P.E., VDOT

Reston Association Board of Directors

Reston Citizens Association Board of Directors

ARCH Board of Directors