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February 4, 2013

Ms. Clara Quintero Johnson
Office of Comprehensive Planning
Fairfax County Department of Planning and Zoning
12055 Government Center Parkway
Fairfax, VA 22035

RE: Comments on Route 28 South Draft Comprehensive Plan Language

Dear Clara:

We represent JLB Realty, LLC ("JLB"), which is the title owner of property located at Tax Map 16-3 ((1)) Parcel 4M (the "JLB Property" or "Property"). The JLB Property is located in the southeast quadrant of Sub-Unit A-1 of the Dulles Suburban Center. After carefully reviewing the draft Comprehensive Plan text for the area dated January 11, 2013, JLB has asked us to share some preliminary comments.

As you know, JLB is actively pursuing a residential development program on the Property. However, as a general matter it seems that the draft Comprehensive Plan text creates several disincentives for residential development. In particular, the arbitrary requirements that all developments over a 1.0 FAR should contribute additional workforce housing units and should substantially increase their stormwater management commitments will limit the ability of applicants to provide developments that contain significant residential components.

Land Use

1. **Table X: Planned Development Potential** – This chart appears to have undergone substantial changes from the previous draft text dated October 5, 2012. One of the most notable changes is that industrial uses are reduced from 150,000 square feet under the "2012 Land Use" numbers to zero in the "Comprehensive Plan" column. The JLB Property is one of several in the area that is currently zoned to the I-4 Medium Density Industrial District. As such, development totaling approximately 250,000 square feet of industrial (or office) space could be constructed by-right on the JLB Property regardless of the Comprehensive Plan language. Although JLB currently intends to seek entitlements to construct residential units on the Property, it is still possible that the highest and best use for the Property will be its existing industrial zoning. For that reason, we believe the Comprehensive Plan should acknowledge this possibility.
2. **Parcel Consolidation** – Although we agree that parcel consolidation is a worthy goal, the Comprehensive Plan should acknowledge that there will be many cases where there are limited opportunities for such consolidation. For instance, the JLB Property is surrounded by properties that were developed more recently. One adjoining property is



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an office condominium. This limits opportunities for consolidation. Rather than stating an absolute requirement for parcel consolidation, the Comprehensive Plan should instead focus on encouraging developments that are specifically designed to avoid the types of conflicts that would make it more difficult for neighboring properties to develop in accordance with the Comprehensive Plan.

3. **Affordable Housing & Universal Design** – The draft language suggests that any residential developments that exceed a 1.0 FAR should contribute affordable and workforce units that are greater than current Countywide policies. We respectfully suggest that this arbitrary intensity number is too low in most cases to permit expanded affordable and workforce housing contributions. Rather than focusing on an absolute 1.0 FAR number, the Plan should instead focus on other factors when determining whether additional workforce housing contributions are in order, such as whether a proposed development is at the top of the Plan’s recommended density range. In addition, we believe that the expanded workforce housing requirements should be focused on development in areas closest to the Innovation Metro Station. Moreover, language should be added permitting applicants to exceed the specific FAR limitations in the Plan in order to take advantage of bonus density from workforce and affordable housing.
4. **Tier 3: Beyond ½ Mile** – The draft Comprehensive Plan language states that the area should be predominantly residential, but also states that residential should be a minimum of 45% of total development. We respectfully suggest that in order to incentivize residential development, the minimum residential number should be 50%, with office uses at 45%.
5. **Relationship to Sub-Unit B-1** – The Comprehensive Plan should acknowledge the connection between the eastern portions of Land Unit A and Sub-Unit B-1, which contains substantial neighborhood and regional retail outlets. As a result of that logical connection, applicants in these areas should not be expected to create additional retail establishments on their properties that will compete with these long-established nearby retailers, which are within walking distance of the eastern portions of Land Unit A.

Transportation

6. **Monitoring System** – The draft Comprehensive Plan language recommends a review of development and vehicle trips every five years or “based on changes in circumstances.” However, the context of such a review is unclear. Is such a study to occur during the normal Area Plans Review process? If so, we recommend clarifying this statement so that the context, goals and triggers for such a review are completely transparent.
7. **Road Network and Circulation** – JLB supports the “Additional Centreville Road Crossing at McNair Farms Drive,” which appears to be located at the edge of the JLB Property and also traverses property owned by the Fairfax County Park Authority. Such an improvement is clearly beneficial as it will create critically-needed connectivity and permit increased levels of transit-oriented development throughout Sub-Unit A-1. JLB



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submits that the road should be properly classified as a Collector Street without a median.

8. **Road Network and Circulation** – We believe the road classifications need some additional fine-tuning. First, it is not clear to us that Centreville Road should be properly classified as a Principal Arterial/Boulevard, since the County currently classifies it as a minor arterial. In addition, the median widths of 14 – 22 feet for Boulevards, Minor Arterials, and Collector Streets are much too wide and should be reduced to create a more urban environment.
9. **Street “Grid”** – Several points within the draft Comprehensive Plan text describe a “grid of streets.” However, we believe that the ultimate goal is to increase connectivity and create additional options for traffic flow, not to create an actual grid of streets similar to Tysons Corner. As a result, we recommend stronger language stating that Figure T2 is conceptual in nature, clarifying that the recommended street connections are not a complete “grid of streets” and are not likely to be constructed in the actual locations shown on Figure T2.

Environmental Stewardship

10. **Stormwater Management** – For all developments exceeding 1.0 FAR, the draft Comprehensive Plan language recommends stormwater management techniques that are substantially more extensive than the County’s minimum requirements. This appears to create a conflict with an important priority: to increase the number of residential units in Land Unit A. Although some limited reuse and evapotranspiration techniques are possible in residential developments, the options for exceeding the County’s minimum requirements are far more limited for residential developments and remain extremely expensive. The likely result of introducing these techniques at such a low intensity means that most residential developments will voluntarily limit themselves to a 1.0 FAR, thus reducing the overall number of residential units constructed in Land Unit A. The technology for reducing or delaying stormwater runoff in residential units is both more limited and expensive than similar technology for commercial developments. Rather than introducing this arbitrary requirement, we suggest reserving this requirement for developments that are at the very top of the density range, or that contain a commercial component that exceeds 50% of the entire development.

Urban Design Recommendations

11. **Parking Design** – The current draft Comprehensive Plan language should reflect the reality that most parking in this area will be within above-ground podiums. The intensities are simply too low to even consider the added expense of underground parking for most projects. We recommend that the language acknowledge that above-ground podium parking decks will be the dominant parking feature and focus instead on adequate mechanisms for screening through the use of architectural features and active uses.



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Thank you in advance for reviewing these comments. If you have any further questions or comments, please do not hesitate to contact me.

Sincerely,

Shane M. Murphy

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