

Tysons West Straw Man III Comments
Fairfax County Planning Commission Tysons Committee

General Comments
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Affordable Housing

- Agree with the need to provide housing for a range of income levels in Tysons
- However, a 20% requirement is directly opposed to the broader goal of increasing the residential stock in Tysons Corner
- If we want to encourage residential development in Tysons, why require the highest subsidy rate in the entire County?
- Montgomery County currently requires 12% MPDU's and 10% workforce housing; they are in the process of repealing the 10% workforce housing requirement because it has stalled residential development since it was adopted four years ago
- This policy will stall or even halt residential development in Tysons
- Suggestion: make the requirement consistent with overall county requirement of 12% (5% + 7%) and provide bonus density for any projects that voluntarily exceed it.

Concept of "Market Rate Affordable Housing" (3rd bullet on p. 32, and p. 203 in N. Central Dist.)

- Language in this third draft introducing a new concept – "market rate affordable housing"; seems to mean all of the older rental apartment communities in Tysons (Post, Avalon Crescent, McLean Gardens, etc.)
- Requires one-for-one replacement of any existing units deemed as "market rate affordable" and restricted in perpetuity for less than 120% of AMI
- Unsure how the County can mandate that privately owned apartment communities are subject to rent control beyond the affordable housing policy if redeveloped
- As an example, our Avalon Crescent property on Westpark Drive – between Tysons II and the Park Crest Harris Teeter. 558 apartments built in 1997. The current rents probably qualify as "market rate affordable housing". If we redevelop to the 1.5 FAR recommended in the plan, we could rebuild a total of 1,240 apartments. If we're required to provide 558 units of rent-restricted apartments per the current language, this equates to 45% affordable housing. Even if the 558 units were counted outside of that 1.5 FAR, we'd still be at 30%.
- This new concept unfairly penalizes existing apartment communities and significantly discourages the addition of additional residential development on these sites.
- Suggestion: eliminate the concept of "market rate affordable housing" entirely

Green Building (pp. 33, 87, 97)

- Agree with the importance of environmental stewardship in Tysons and elsewhere
- However, the goals need to be realistic
- Current recommendation of LEED Silver minimum is extremely punitive to residential development
- There needs to be a distinction between the requirements for residential and office projects, for two primary reasons:
 - o The Energy and Indoor Air Quality credits are very difficult to achieve in a residential application because individual HVAC units are used as opposed to larger, full building systems used in office buildings

- In office, the building owner generally pays the utilities and therefore benefits from the savings generated by the green measures implemented in the building; in residential, residents pay for their own utilities, so building owners pay for the up front cost of the green measures but don't benefit from the operational savings
- Suggestion: Make LEED Certified level, or comparable rating system, the minimum requirement for residential projects

Parks & Open Space Requirements (pp. 94, 95)

- Agree that open space is very important in an urban context
- Issue seems innocuous enough until you do the math
- The ratios illustrated on pages 94 & 95 suggest 1.5 acres for every 1,000 residents; or in the example provided, one acre for every 330 residential units.
- The open space requirement is extremely costly to residential projects
- Following the example provided in the plan – for a 330 unit apartment building (pretty typical size); a full acre is required; can be provided on site; off-site or funds sufficient to purchase an acre can be contributed; in Tysons Corner an acre costs at least \$2 million. Equates to a minimum of \$6,000 per unit for the 330 unit building in the example. This is a huge cost burden over and above the on-site recreational amenities already required.
- Suggestions:
 - lower the ratio from 1.5 acres per 1,000 residents to a more realistic number;
 - provide an offsetting credit for on-site recreational amenities that residential projects already have to provide to residents – swimming pools, fitness centers, courtyards, etc.
 - office workers and residents can share the same open space – office workers will use during the day and residents will use in the evenings and on weekends; this sharing should be taken into account with the prescribed ratios.

Consolidation Requirements

- The need to coordinate development, particularly relative to the street grid is important
- However, setting a 15 acre minimum consolidation requirement will drastically slow development; if your neighbor's property is encumbered with a 15-20 year lease, they're not likely to want to spend the time or money to go through the rezoning process, so you're stuck
- Suggestion: By adopting the official map of streets as proposed and by establishing District wide infrastructure plans through the CDA's, the same goal is accomplished

Phasing Triggers based on Transportation and Public Facilities (pp. 76 and 108)

- Infrastructure is clearly an important issue in Tysons and one that is challenging to solve
- Establishing development triggers for improvements that are out of a developer's control is a huge challenge for any project
- Building your portion of the street grid, providing necessary right-of-ways, etc. are okay, but requiring something out of your control is not realistic
- We know that staff is working on a solution to this issue and we look forward to seeing it

Intensities in Tiers 2 and 3 (p. 27)

- Intensity of Tier 2 is too steep a drop off from Tier 1, should be more gradual (currently 4.75 to 2.75 to 2.0)
- Just three blocks from Metro, Tier 2 should have higher density
- Suggestion: Tier 2 should be increased from 2.75 to 3.5 and Tier 3 should be increased from 2.0 to 2.5