WELLS + ASSOCIATES

March 17, 2010

Walter Alcorn, Chairman
Tysons Review Committee
Fairfax County Planning Commission
12000 Government Center Parkway, Suite 330
Fairfax, Virginia 22035

RE: Transforming Tysons - Areawide and District Recommendations
Draft Plan Amendment January 15, 2010

Dear Mr. Alcorn:

I am a Principal Associate with Wells + Associates, Inc., traffic engineers/ transportation planners with offices in Manassas, Leesburg, Pittsburgh, Annapolis, and Tysons Corner. Since locating our main office to Tysons Corner in 1994, our firm has witnessed first hand the changes that occur as properties develop and redevelop. As a traffic engineer/planner whose primary practice has been centered in Fairfax County for the past 30 years, both from the private and public sector perspectives, I have had the opportunity to work on a number of notable projects including Tysons Corner Center, 1861 International Drive, The Corporate Office Centre at Tysons II, NADA, 8333 Greensboro Drive, Greensboro Corporate Center, Pike 7 Plaza, The Promenade at Tysons West, and others. Of more recent note, our firm was selected to serve as the traffic engineers in support of the Tysons Corner Demonstration Project.

In reviewing the draft plan in general, I have identified certain issues/concerns associated with the draft text. Tonight I will address four specific areas of concern:

- Congestions Standards,
- Street Networks,
- Transportation Demand Management (TDM), and
- Phasing

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Congestions Standards

Overview. The adopted Tysons Corner Comprehensive Plan establishes a Level of Service "E" standard in assessing the adequacy of the transportation system with the exception of all the Margarity Road intersections (not including the Route 7/Margarity Road intersection), the Gallows Road/Merry Oaks Lane intersection, and the Route 123/Horseshoe Drive intersection (at these locations, a LOS "D" standard applies). The adopted Plan further recognizes that certain development proposals generate relatively few trips and do not have the transportation impacts of larger development proposals. Therefore, the LOS "E" standard does not apply to those proposals generating fewer than 150 peak hour trips. Under the current Plan, those proposals generating more than 150 peak hour trips are expected to demonstrate attainment. Importantly, however, if such conditions can not be attained, applicants are encouraged to provide commitments in compliance with the following County-wide policies:

"Non-degradation" Policy. The non-degradation policy requires applicants to ensure the transportation system affected by the application "performs no worse after the project is developed than it would otherwise."

"Offsetting Impact" Policy. The offsetting impact policy requires applicants to contribute to transportation improvements on a proportional basis. This policy further recognizes that in some instances, it may be impossible for performance to be maintained or for one individual applicant to provide the transportation improvements which may be needed.

The draft Plan text dated January 15, 2010, reaffirms the LOS "E" standard for Tysons Corner; however, the draft Plan no longer recognizes the relative negligible impact associated with smaller projects (i.e., those that generate less than 150 peak hour trips.) The draft Plan further states where the LOS "E" standard cannot be attained or maintained with planned development, remedies should be proposed to offset impacts using the tiered approach described therein and summarized below:

Determine whether additional capacity and/or increased operational efficiency is possible. The widening of existing roads or intersections is not recommended in lieu of an expansion of the grid of streets. According to the draft Plan, the expansion of the grid of streets will create additional diversionary paths for vehicles thereby potentially easing congestion at some locations. While I agree

distributing traffic over a larger area will ease spot congestion, the addition of new street links could require the acquisition of off-site rights-of-way and/or easements outside the limits of an individual project or consolidation. The result could, in essence, pit one developer/land owner against another. If needed within an individual project, additional links may also further divide properties leaving the residual land area too small to accommodate usable and efficient building footprints.

Decrease site-generated traffic. Failing the provision of additional capacity or the expansion of the grid, the draft Plan text recommends changing the mix of uses within the parameters of the applicable land use guidelines (i.e., replacing office or retail uses with residential uses), increasing transit use, and/or optimizing the application of TDM measures. While each of these measures outlined above has been shown to reduce site-generated traffic, the quantitative application of such measures in level of service analyses is restricted or limited by the VDOT Chapter 527 guidelines.

As you are aware, in 2006 the Virginia General Assembly approved legislation (Senate Bill 699, Chapter 527 of the 2006 Acts of Assembly) to enhance the coordination of land use and transportation planning in the Commonwealth. Subsection 15.2-2222. of the Code of Virginia was added to expand VDOT's role in the land planning and development review process. Chapter 155, 24 VAC 30-155 establishes the rules, procedures, and deadlines for VDOT review. Implementation of these regulations was phased statewide over 18 months (July 1, 2007 to January 1, 2009). Implementation in the Northern Virginia District of VDOT began on July 1, 2007. All development proposals which meet certain specific trip generation thresholds are subject to the regulations as outlined in VDOT's *Guidelines for Traffic Analysis.*

The guidelines, established in conjunction with the legislation, restrict the use of internal capture and mode split reduction factors. The guidelines specify that the reductions taken to account for synergy between uses (i.e., internal capture) must be based on the smaller of residential or non-residential uses (i.e., whichever generates fewer trips). For example, for development proposals consisting of residential with office uses, the guidelines indicate that the reduction must be the smaller of 5% of the residential trips or 5% of the office trips. The guidelines also severely limit the type of interaction that can occur within a mixed use development. For example internal trips between the retail and office components or between retail and hotel uses or between various entertainment uses within the same development are NOT permitted. Internal capture rates which exceed the VDOT standards may be used, but not without

the submittal of appropriate documentation. Such documentation/studies in support of the higher rates must be confirmed to "...have been done in areas with economic, geographic and social similarity to the location with the proposed development." The application of mode split reductions is similarly treated in the guidelines. Practically speaking, since its implementation in July 2007, both VDOT and the County have limited the use of such factors in the evaluation of levels of service. Therefore, in terms of level of service analyses, it is unlikely that any theoretical benefit can be demonstrated by the increased application of such factors.

Offsetting Impacts. According to the draft Plan text, if the above measures do not provide adequate improvement of levels of service, a development may need to be conditioned on completion of offsetting improvements. The draft Plan text does not define "adequate improvement" or the scope of offsetting improvements. The currently adopted Plan text for Tysons however, defines offsetting impacts as "...contributions to transportation improvements ***proportional*** [emphasis added] to the traffic generated by the project and the amount of capacity required to accommodate that traffic." The draft Plan text states "financial contributions of ***significant*** [emphasis added] value dedicated to addressing deficiencies in the Tysons area ***may*** [emphasis added] be considered an offsetting improvement." Such language without the definition of key terms or any continued recognition of proportional impacts is problematic at best in applicants securing project funding.

In light of the above, it is suggested the draft plan text be revised to reflect the County's current "non-degradation" and "offsetting impact" policies and practices, as well as reviewing the level of service standards against the limitations and restrictions associated with the application of VDOT's Chapter 527 guidelines.

Street Network

The draft Plan text recommends the development of an urban grid of streets characterized by small block sizes, pedestrian/bicycle amenities, and connectivity (i.e., the grid of streets.) The text further recommends the use of urban design oriented nomenclature for functional classification purposes and relates FHWA based functional class to the more urban classifications.

VDOT bases their functional classification of roadways on the federal system according to the character of service they are intended to provide. Each

highway is assigned a functional classification based on the highway's intended purpose of providing priority to through traffic movement versus adjoining property access. The functional classification utilized by VDOT and FHWA groups highways into three categories identified as (1) arterials with the function to provide through movement of traffic; (2) collectors with the function of supplying through movement and property access; and (3) local roadways, which provide direct property access. Within Fairfax County, VDOT is responsible for the maintenance and permitting associated with virtually all of the County's lane miles.

In 2007, the Virginia General Assembly unanimously approved legislation to direct the VDOT commissioner to develop and implement access management regulations and standards with the goals of:

- Reducing traffic congestion,
- Enhancing public safety by decreasing traffic crash rates,
- Supporting economic development by promoting the efficient movement of people and goods,
- Reducing the need for new highways and road widening by maximizing the performance of the existing state highways, and
- Preserving the public investment in new highways.

Implementation was phased by roadway functional classification as determined by VDOT. The standards were imposed on *principal arterials* (such as Routes 7 and 123 within Tysons) statewide, effective July 1, 2008. Implementation with regard to *minor arterials, collectors, and local streets* became effective on October 14, 2009, and has been incorporated as *Appendix F* of the VDOT *Road Design Manual.*

The intent of these new regulations (24VAC 30-73) is to provide the means to "control the location, spacing, design, and operation of entrances, median openings, traffic signals, and interchanges for purposes of providing vehicular access to land development in a manner that preserves the safety and efficiency of the transportation system." These new regulations are not "retroactive" and will be assessed at time of new permit application.

Entrance locations identified on proffered development plans, subdivision plats, and site plans approved prior to October 14, 2009 will be exempt from spacing standards. The cross sections, grid spacing, and functional classifications

provided within the draft Plan text appear to conflict, in large part, with VDOT's recently enacted access management regulations and design criteria.

For example, Routes 7 and 123 are classified by both VDOT and Fairfax County (currently) as principal arterials. The function of such roadways is through traffic mobility. Based on the Road Design Manual, signalized intersections along principal arterials should be spaced 2,640 feet apart. Unsignalized intersections should maintain 1,320 feet distance and partial access locations should be 325 feet apart. The grid network proposed by staff would not meet these spacing criteria at many locations, thereby creating a situation in which applicants likely would be required to file exceptions to VDOT's access management standards for those properties with frontage and access oriented to either Route 7 or Route 123. Similar situations will also likely occur on minor arterials (or avenues as reflected in the draft Plan text), such as Spring Hill Road, Tyco Road, and Greensboro Drive. In order to minimize or reduce the need for such exceptions, it is recommended that VDOT review, and in conjunction with the County, establish an access management corridor plan specific to certain critical public roadways in Tysons Corner.

Further, although typical cross sections detailing curb-to-curb widths are provided for in the draft Plan text, no delineation of right-of-way for these new "public" streets is offered. Traditionally, right-of-way is located a minimum of three feet behind the curb, resulting in minimum rights-of-way along key sections of avenues and boulevards of between 94 to 116 feet, excluding streetscape and sidewalk sections.

The issue of public versus private streets has long been discussed with Staff during the Demonstration Project process. While I concur with Staff that certain critical links such as Greensboro Drive Extended should be constructed as public streets, the Plan for Tysons Corner may be better served if the flexibility to design and construct the grid (or portions thereof) as private streets is permitted. The reasons for the continued use of private streets (such as occurs in Reston Town Center and other approved but as yet unbuilt projects like Merrifield Town Center and Metro West) are numerous and include, but are not limited to, the following:

- Clear zone requirements associated with public streets may preclude or hinder the ability to landscape as reflected in the typical sections,
- Garages are not permitted to extend under public streets,
- Air rights are not reserved,

- Utility conflicts,
- Street closures are severely restricted on certain public street classifications,
- Permanent turnarounds are required at the terminus of all public streets,
- Street light types are restricted along public streets,
- Types of drainage structures are restricted,
- Use of public sidewalks for café seating is restricted, and
- Design speeds are preset.

Additionally, certain elements reflected in the draft Plan's typical cross sections, such as reduced lane widths and parking on boulevards (principal arterials) and avenues (minor arterials), would not be permitted without the waiver of VDOT standards. It also should be noted that the draft Plan references new on-street loading areas. VDOT does not permit loading on public streets under its control. In order to minimize the need for individual design waivers and/or exceptions, it is recommended the County secure VDOT approval on all typical sections unique to Tysons Corner and the Plan text recognize the appropriateness and need for private streets.

Transportation Demand Management

In order to assist in the balance of land use and transportation, the draft Plan text recognizes that the implementation of transportation demand management (TDM) strategies is critical to the continued growth and development of Tysons Corner. At full build out of Tysons as proposed, TDM vehicle trip reduction goals range from 45% outside of Transit Oriented Development (TOD) areas to between 50% and 65% in TOD areas. These reductions include an ultimate overall mode split of 31% for Tysons Corner, leaving the balance of the reduction predicated on the mix of uses and implementation of TDM strategies.

Key elements of these programs include phasing of the goals over time, implementation plans including remedial, contingency, and penalty funds. Further, the draft Plan recommends tying future development to the success of achieving the interim vehicle trip reduction goals. Given that a large portion of the goal appears to be predicated on a mix of uses (and the synergy that

results), restricting future development appears to conflict with the goal of facilitating the mix. Additionally, there should be some recognition in the Plan that the establishment of funds for remedial measures, contingencies, and penalties should be capped. Without such financial caps, it will be difficult for land owners and developers to secure project funding. Also, given the relatively modest mode splits assumed for all of Tysons Corner, penalties should be keyed to achievement of mode splits and not to the TDM goals reflected in Table 6.

Another key element contributing to the success of TDM programs will be the management of parking in Tysons Corner. Table 7 of the draft Plan provides parking ratios for residential, office, hotel, and retail uses in TOD and non-TOD areas. According to discussions with Staff, the parking ratios have undergone a great deal of discussion and review prior to publication. On page 60 of the draft Plan, the text states parking studies should be submitted with any development in a TOD district. It is unclear as to the need for parking studies to be submitted if projects are meeting the maximums set forth in Table 7. It is recommended that the requirement for a "parking study" be eliminated from the draft Plan text.

Phasing

The draft Plan text identifies certain strategies which must be implemented in order to maintain a balance between land use and transportation. Specifically, increases in development were reviewed in conjunction with the provision of specific transportation programs and infrastructure as reflected on Table 8. It is not clear, however, how the improvements in Table 8 relate to district densities. According to the draft Plan text, development should be phased based on the required funding of transportation infrastructure and the demonstrated ability to achieve the trip reductions specified in Table 6. The funding could be achieved by the forming and/or participating in a CDA. Does this imply that no development above the district baseline levels can be applied for in the absence of an established CDA? Further, how does one achieve the trip reduction levels without the mass required to achieve the synergy and mode splits upon which the Table 6 goals are based?

I thank you and the committee for the opportunity to present my concerns and issues and would appreciate your consideration of my suggestions.

Sincerely,

Robin L. Antonucci
Principal Associate