

**Sierra Club Great Falls Group Comments on Tysons Draft Plan**  
**March 17, 2010**

My name is Douglas Stewart and I am speaking for the Great Falls Group of the Sierra Club, with more than 4,000 members in Fairfax, Loudoun, Prince William and Fauquier Counties. We think the draft plan is generally solid, and the overall level of development presented by staff is appropriate and sufficient to create a critical mass of mixed-use, walkable development. The main points we want to address are the phasing of development, street design, the implementation entity, and future transit improvements beyond the Silver Line.

We're less concerned about the question of how much development is right as where this development occurs and when. We like the stated target of 75 percent within ½ mile of the four stations, and 25 percent in the remaining areas. We share the concerns voiced by Mr. Zook about a "swiss cheese" effect that could result from a lack of clear regulations and incentives that mass the highest densities near the stations and taper down from there. We believe the plan's phasing mechanisms should allocate a high proportion of growth in core TOD areas before other areas can be developed. Encouraging the earliest and densest development to occur in the core TOD areas is the best way to leverage the Silver Line to replace car trips with walking, bicycle and transit trips.

The second best way is through street design. We are extremely concerned by the plans proposed by the Airports Authority and VDOT for Routes 7 and 123. These are the roads directly abutting the station areas, the first point of interaction between Silver Line transit riders and Tysons, and yet they are being planned with almost no human-scale orientation to the transit stations. They are being planned as cookie-cutter arterial roads that will be extremely difficult to cross at grade. It's hard to imagine developers or their architects designing high-quality buildings oriented toward such auto-centric streets. It's hard to imagine tenants such as restaurants or retail stores wanting to locate along such auto-centric streets. And it's hard to imagine anyone enjoying walking or bicycling along such auto-centric streets. I think we're preaching to the choir here, but we must pull any levers we have to compel more flexible designs for Routes 7 and 123 as well as International Boulevard. Otherwise this will be half-baked TOD.

The success or failure of Tysons redevelopment will fall heavily on how well the many moving parts are coordinated over time by the Implementation Entity. The IE remains undefined in terms of its make-up and powers. In general, we support a structure that provides the IE with broad powers and a robust funding stream while making it accountable to the Board of Supervisors for key goals and milestones – for example, reaching transit and pedestrian mode share goals.

Finally, we are encouraged that recent discussions about the plan and requirements for full build-out have acknowledged the need for better regional transit, especially a Virginia Purple Line that would connect Tysons with Bethesda on one side and Merrifield, Annandale and Springfield on the other. The current language on p. 43 of the plan indicates the need for two transit lines, one

connecting to a future Orange Line station and another to Montgomery County. This sounds to us like a single circumferential rail project, and we'd suggest the language be amended to recognize this. We are perplexed why a future Orange Line connection is mentioned when the transit line could connect along Gallows Road to the current Dunn Loring station, which would be a natural TOD corridor. At a minimum, the plan language must represent such a transit line properly so that right-of-ways can be identified and steps, such as inclusion on other plans and feasibility studies, can be done and move the project to implementation. We question the delay of this until after the development of 84 million square feet.