

COMMENTS ON DRAFT TYSONS IMPLEMENTATION PLAN AMENDMENT,
S13-II-TY1, DATED JANUARY 25, 2016

SECTION 2: VISION FOR TYSONS

1. PAGE 10, 3RD PARAGRAPH, THIRD LINE: Revise, as follows: “Development occurring in the early years of the Plan’s implementation (2010-2030) should ~~will~~ significantly advance the grid of streets...”

RATIONALE: The 2010 Tysons Comprehensive Plan Amendment identified the period from 2010-2030 as the “early years.” The timeframe covered by the term “early years” in the draft 2016 Implementation Plan currently is not specified. This omission makes it difficult, if not impossible, for both citizens and developers to identify when specific actions are required and whether “early year” requirements are being met. Further, since the early year requirements outlined in the 2010 Tysons Comprehensive Plan Amendment have not all yet been met, the appropriate verb for this sentence is “should”, not “will.” “Should” keeps the focus on what the developers and County must accomplish in this early timeframe.

2. PAGE 11, FIFTH BULLET UNDER TRANSPORTATION: Revise, as follows: “Traffic impact analysis for each redevelopment project, evaluating three time periods: (1) first phase, (2) interim phases (as needed), and (3) Plan build-out.

RATIONALE: Clarity; confirms that bullet refers to specific redevelopment proposals and not the overall Tysons Plan.

SECTION 3: IMPLEMENTATION

3. PAGE 18, PARKS AND OPEN SPACE: Revise last full sentence as follows: “This guidance will need to be periodically reviewed and refined to reflect the needs and desires of the residents and workers, as well as to limit negative impacts on surrounding communities outside of Tysons.”

RATIONALE: A core tenet of the Tysons Plan that was essential to securing the support of the surrounding communities (McLean and Vienna and Providence District) was the commitment by the County to mitigate the negative impacts of Tysons growth on those communities. This additional

language is to ensure that due account is taken of this commitment in the future.

4. PAGE 23, PRIVATE PARTNERSHIPS: Revise third sentence, as follows: “These private partnerships should ensure that new developments in Tysons can support the dedication of land or building space for parks, ~~active fields~~ athletic fields, and open space; rights-of-way to implement the grid of streets and proposed Circulator System; and public facilities such as fire stations, schools, libraries, a performing arts center, a conference or convention center, and community centers.”

RATIONALE: The draft 2016 text deleted certain public facilities from the list of public facilities. It is unclear whether these deletions were because private partnerships already have dedicated land or building space for these facilities -- libraries, a performing arts center, a conference or convention center. If so, those deletions may stand or be replaced by an acknowledgement that sufficient land or building space already has been dedicated for these. If dedications are still required for these purposes, reference to these needs should be retained.

Further, we assume that the term “active fields” refers to athletic fields. Inasmuch as “active fields” is not a widely accepted or understood term, we believe it would be more appropriate to use the term “athletic fields.” The dedication of land for or building of athletic fields within Tysons should be included to underscore their importance. Also, it is critical to note that 20 athletic fields were deemed sufficient only under urban standards. Many more would otherwise be required under standards governing the rest of the county.

SECTION 4: AREA-WIDE RECOMMENDATIONS

LAND USE

5. PAGE 25, LAND USE PATTERN, SECOND PARAGRAPH, LAST SENTENCE: Delete “adjoin”, add “nearby” and retain “outside of Tysons.” Sentence would then read, “The Non-TOD Districts also contain areas that should maintain their existing characters, uses, and intensities due to their proximity to nearby adjoining residential neighborhoods outside Tysons.”

RATIONALE: The Tysons Plan needs to consider the effects of land use on nearby neighborhoods and not just those that are immediately on the border of Tysons. Also, the text needs to be clear that these are neighborhoods that are outside Tysons.

6. PAGE 28, MAP 3: Suggest using a deeper shade of green for either “parks/open space” “elevated park space” so that they can be more clearly differentiated. Also, does Map 3 only show existing and approved park/open space or also proposed? There should be a footnote explaining this point.

RATIONALE: Clarity; both appear on the map to be the same color.

7. PAGE 29, PARKS/OPEN SPACE: Revise first sentence, as follows: “These areas are planned for passive and active park land, including athletic fields for sports such as soccer and baseball, and urban open spaces, such as plazas and pocket parks.”

RATIONALE: Parallelism; examples of “urban open spaces” are provided. The addition provides comparable examples of “active park land.”

8. PAGE 31, INITIAL DEVELOPMENT LEVEL, FIRST FULL DELETED PARAGRAPH: Retain paragraph.

RATIONALE: Explains why the IDL concept is important and needed.

9. PAGE 31, INITIAL DEVELOPMENT LEVEL, SECOND FULL DELETED PARAGRAPH: Retain paragraph that begins with “The following criteria should be considered when determining an increase in the initial development level for office uses” and includes the following four bullets: (1) Progress achieved toward the realization of the vision for Tysons; (2) Market demand for office space, as demonstrated by new building construction, vacancy rates, and revised forecasts; (3) Balance between land use and transportation, including the provision of infrastructure and achievement of vehicle trip reduction levels identified for the year 2030 and TSM performance that exceeds the targets outline in Table 5 in the Transportation section; and (4) Funding arrangements for transportation improvements and programs, so that timely completion of improvements identified for the period beyond 2030 can confidently be expected.

RATIONALE: This paragraph outlines the criteria that must be met before the IDL is dropped. Some progress has been achieved toward the realization of the Tysons vision. While funding arrangements for Table 7 and Table 7B transportation improvements have been identified, it is far too early to be confident that the posited funding sources for post-2030 projects will materialize in a timeframe and magnitude to allow timely completion of required post-2030 projects. Moreover, while market demand for office space is down based on overall vacancy rates, it will not likely remain at current levels indefinitely. Also, we do not yet have sufficient data to confidently ascertain that going forward, there will be the necessary balance between land use and transportation, including the infrastructure and vehicle trip reduction levels identified for 2030, and TDM performance that exceeds the targets outlined in Table 5 in the Transportation section of the 2010 Tysons Plan.

As County staff explained to both the MCA Planning and Zoning Committee and to the Greater Tysons Citizen Coalition (GTCC), it will be at least another decade and possibly not until 2030 that we will have sufficient data points on certain land use and infrastructure factors to be confident that adjustments are warranted. This holds for the IDL as well, as evidenced by the last sentences on page 32. Those sentences call for continual monitoring to ensure that the pace of development and transportation improvements are proceeding substantially in tandem. They also call for evaluating, beginning in the summer of 2024, how the assumptions about development and transportation in the Comprehensive Plan have materialized over time, and, based on the results, proposing appropriate adjustments to the development and transportation assumptions. Finally, if the IDL were completely lifted, it is highly unlikely that a limitation could be re-established.

We would note that the GTCC earlier supported a 5 million square foot increase in the IDL to cover potential office development on the south side of Route 7. There is no evidence that this higher permitted level of office development is inadequate to meet demand for new office space

in a manner that is balanced with residential development and needed increases in infrastructure, most especially road and non-rail transit.

10. PAGE 31, INITIAL DEVELOPMENT LEVEL, THIRD FULL DELETED PARAGRAPH: Retain.

RATIONALE: Would enable easy tracking of achieved IDL level.

11. PAGES 31-32, INITIAL DEVELOPMENT LEVEL, PARAGRAPH BEGINNING ON THE BOTTOM OF PAGE 31: Delete the first four sentences (“On January 8, 2013...the IDL of 45 million square feet of office use has been superseded.”).

Replace with the following: “As of December 2016, the Board of Supervisors had given its approval to a sufficient number of Conceptual Design Proposals (CDPs) and Final Design Proposals (FDPs) that, if all were fully realized, would result in Tysons exceeding the 45 million square foot limit on office space in Tysons that was adopted by the County in order to ensure balance between office, residential and public infrastructure. These approved plans did not provide for redevelopment of the commercial strip malls along the south side of Route 7 in Tysons. Since some progress has been made toward meeting the criteria for IDL expansion that were approved in the 2010 Plan, and to encourage redevelopment of the commercial strip malls along the south side of Route 7, it would be appropriate to establish a separate, interim IDL for only this area, e.g., of 5 million square feet, to be available until such time as the overall IDL is increased or lifted as a result of progress on all four of the conditions.”

RATIONALE: We do not believe, as stated in Comment 11 above, that the conditions established in 2010 for dropping the IDL have been met. We are concerned that, if the IDL is not retained, albeit with a special provision for the south side of Route 7 strip malls, the balance between office and residential uses and space within Tysons that was established in the 2010 Plan will not be achieved, more office and less residential will be built than is required to achieve the Tysons vision, and traffic congestion will be exacerbated.

12. PAGE 37, PHASING DEVELOPMENT TO TRANSPORTATION INFRASTRUCTURE AND PUBLIC FACILITIES, AT THE END OF THE FOURTH PARAGRAPH: Add a sentence along the following lines: “In this regard, there

is a need, before Tysons has been built out to a level of 84 million square feet, to ensure the existing ability to enforce the cancellation of each new single occupancy vehicle (“SOV”) trip into Tysons with a non-SOV trip. “

RATIONALE: Traffic studies conducted before the June 2010 adoption of the revised Comp Plan for Tysons demonstrated that, once Tysons was built to 84 million square feet, the Beltway, the Dulles Toll Road, Route 7 and Route 123 will reach failure daily (i.e., total gridlock). Therefore, to avoid catastrophic failure of major roadways, the County concluded that at 84 million square feet of buildings in Tysons, every new SOV trip into Tysons must be canceled by a non-SOV trip. Even assuming Tysons becomes a model for efficient and effective Traffic Demand Management (“TDM”) programs, the “trip-cancelling goal” is extremely aggressive and may not occur. It is, therefore, critical for the County to be certain of the ability to meet this requirement. Otherwise, there will be major negative effects on the quality of life in Tysons, Vienna, McLean, and the Providence District, and also on the economic viability of Tysons and public safety.

13. PAGES 39-40, PHASING DEVELOPMENT TO TRANSPORTATION INFRASTRUCTURE AND PUBLIC FACILITIES, PHASING TO PUBLIC FACILITIES, DELETED LANGUAGE AT BOTTOM OF PAGE 39 AND TOP OF PAGE 40: Retain language stating: “Detailed plans for the provision of public facilities, including parks and athletic fields, for a district or subdistrict should be in place prior to, or concurrent with, the first rezoning approval in the district or subdistrict. Such plans should enumerate the public facilities needed in that district, the proposed locations for the facilities, their anticipated year of construction, and the private sector’s commitments toward the provision of those facilities. The public facilities plans should be coordinated with the county and landowners within the district or subdistrict.” Additionally, add a sentence along the following lines at the end of the retained language: “The general location of proposed public facilities should be indicated on a map designed to track achievement of public facility needs.”

RATIONALE: It is unclear why the cited language was deleted since it provides implementing guidance for (1) achieving the objective of ensuring that developers provide the necessary land and/or space to ensure facilities are constructed in concert with the pace of growth

districts, and (2) tracking the provision of facilities at the necessary granular level to ascertain whether and if so, when, adjustments are necessary. Retaining this language and adding an additional sentence calling for a map is crucial to ensuring that stakeholders can determine whether public facility objectives are being considered and implemented.

14. PAGE 40, PHASING DEVELOPMENT TO TRANSPORTATION INFRASTRUCTURE AND PUBLIC FACILITIES, PHASING TO PUBLIC FACILITIES, FIRST FULL PARAGRAPH: Replace “important” with “critical,” the word originally used.

RATIONALE: It is not clear why “critical” was replaced with “important.” “Critical” conveys the meaning that consolidation of parcels or land areas is essential in order to achieve the public facility objectives; “important” conveys the sense that these objectives may be achievable even without consolidation of parcels or land areas, which is not a true statement.

15. PAGE 40, PHASING DEVELOPMENT TO TRANSPORTATION INFRASTRUCTURE AND PUBLIC FACILITIES, PHASING TO PUBLIC FACILITIES, DATA COLLECTION AND APPLICATION, FIRST PARAGRAPH: Retain the first two sentences that were deleted in the draft and revise the first PCTC-added sentence, as follows: “Monitoring the progress of the Plan toward achieving the vision for Tysons is essential. Advances in information technology have and will continue to increase the County’s capacity to maintain databases that may be shared among agencies and with the public. Collecting and applying key information and data is essential for continued planning efforts in Tysons and other activity centers in the county and the region.”

RATIONALE: The language in the first two sentences should be retained because it recognizes the importance of monitoring progress and of transparency and sharing of data with the public. The addition to the first PCTC-added sentence incorporates language previously in the Plan that recognizes that data collected about Tysons is important not only for Tysons planning efforts but also for efforts elsewhere in the County and region.

16. PAGE 45, PHASING DEVELOPMENT TO TRANSPORTATION INFRASTRUCTURE AND PUBLIC FACILITIES, PERFORMANCE OBJECTIVES FOR COORDINATED DEVELOPMENT AND PARCEL CONSOLIDATION, SECOND BULLET: Add "athletic fields" to the list and revise as follows: "Provision of parks, open space, athletic fields, and other recreational facilities as set forth in the Parks and Recreation section of the Areawide Recommendations, either on-site or within the subdistrict through a partnership."

RATIONALE: Athletic fields are a unique and necessary requirement and deserve comparable mention to other types of park facilities and to underscore the essentiality of providing them within Tysons.

TRANSPORTATION

17. PAGE 66, MAP 7, PLANNED TYSONS ROAD NETWORK AND FUNCTIONAL CLASSIFICATION: Add a footnote, along the following lines: "Magarity Road represents a special case in that it abuts low density residential neighborhoods outside Tysons; due consideration to this fact must be given in the design of the road, to mitigate impacts on lower-density areas adjacent to Tysons."

RATIONALE: To recognize that Magarity Road is a special case and the Plan's commitment to mitigate impacts on areas outside of Tysons of increasing density in Tysons. Improper treatment of this street, such by permitting excess width or speed limits, would likely increase traffic loads, encourage speeding and otherwise cause negative effects on residents.

18. PAGE 92, MONITORING SYSTEM, SECOND PARAGRAPH, SECOND SENTENCE: Retain last two PCTC-deleted sentences: "The benchmark of success in the essential strategy of maintaining a balance between land use and transportation is the number of vehicles trips entering Tysons and the associated delay due to congestion. For this reason, it is considered essential to monitor the number of vehicles entering and exiting Tysons over time and determine the associated delays due to congestion."

RATIONALE: Monitoring congestion is an essential part of gauging the impact of Tysons' growth so the sentences should not be deleted.

PARKS AND RECREATION

19. PAGE 105, FIFTH PARAGRAPH, SECOND SENTENCE: Revise, as follows: Park land designated for public use can be publicly owned, privately owned or provided through public-private partnerships.”

RATIONALE: Clarifies that parkland proffered or otherwise provided by developers to satisfy demand created by redevelopment will be available to the public, irrespective of ownership, as opposed to internal private open space intended for use by building owners, residents, tenants, or guests.

20. PAGE 107, GREEN NETWORK COMPONENTS: Add a new paragraph that addresses athletic fields as a specific component of the Tysons park and recreation system, or alternatively, modify the language in the section on Multiple Urban Parks, as follows: “A diversity of public spaces ranging in size, function, and character to support formal and informal ~~passive and active~~ activities, including active sports such as baseball and soccer, will be located throughout Tysons.”

RATIONALE: It is not clear what is meant by “passive and active activities.” The better and much clearer formulation is “formal and informal activities, including active sports such as baseball and soccer.” Athletic fields are a unique requirement and deserve comparable mention to other types of park facilities, including cultural resource parks in the introductory part of this section of the 2016 Implementation Plan.

21. PAGES 112-113, PARKS AND RECREATION GUIDELINES, LAST PARAGRAPH ON PAGE 112, SIXTH SENTENCE: Delete the sixth sentence that begins on page 112: ~~”Some of the active recreational facility needs may be accommodated by adding or upgrading facilities at existing or future public school sites or in nearby existing parks surrounding Tysons.”~~

RATIONALE: The language is in contravention of the vision for Tysons as a place where residents can work, live and play. It is also in contravention of the commitments made to the surrounding communities to place 20 athletic fields in Tysons and to limit any negative impacts due to Tysons development, including from traffic

congestion and facility use, on the surrounding communities. (See Pages 7-11, Vision for Tysons).

Placing athletic fields outside Tysons likely would undercut the attractiveness of Tysons as a place to live as well as contribute to congestion as Tysons workers and residents would need to travel by car to those fields. Further, notwithstanding statements elsewhere in the draft Implementation Plan Amendment (pages 11, 105, 111-112), this added language would increase the pressure to place athletic fields designed to serve Tysons in the surrounding communities of McLean and Vienna, both of which lack useable, available land to meet these needs as well as their own for more fields.

There are also practical limitations that should be considered. The 2010 Plan created an urban standard for athletic fields that had the effect of reducing by two-thirds the number of athletic fields that otherwise would have been required in Tysons under the county-wide recreation facility standards, i.e., from 60 athletic fields to serve the population posited for Tysons to 20 athletic fields. As noted in the draft Implementation Plan Amendment, the reduction was justified by the argument that the use of field lighting and synthetic turf and scheduling that provides for longer and more efficient use of fields in Tysons should help ensure adequate field capacity in Tysons to meet the needs of its population. However, to the extent that "Tysons fields" are placed outside of Tysons, they would be outside the urban area and therefore required to meet the county-wide (non-urban) standards. These county-wide standards would increase the number of fields required (1 urban field = 3 fields outside of the urban area) and place restrictions on the use of field lighting and hours of operation, consistent with their non-urban location and to protect the tranquility and quality of life for the surrounding suburban homes. These facts would argue that for every field that is not provided within Tysons, the developers would need to build/pay for three fields outside of Tysons. However, from a strictly practical perspective, it has not been demonstrated in the Plan or elsewhere that sufficient usable vacant land exists in McLean or Vienna to locate the athletic fields needed by Tysons residents and workers. Finally, in this regard, it is worth noting that the athletic fields in the McLean and Vienna areas are already

oversubscribed and those areas have their own separate needs for additional fields.

PUBLIC FACILITIES

22. PAGE 118, LIBRARIES: Delete second paragraph that discusses Pimmit Regional Library and replace with the following: “Another consideration is the ongoing renovation of the Tysons-Pimmit Regional Library that, when finished in Summer 2017, will provide multiple meeting, group study and quiet study rooms for use by not only by the current primary users in the Dranesville District but also by future Tysons residents. Further renovation could be considered if/when the need arises in the post 2030-2040 time frame.”

RATIONALE: The current text fails to recognize the substantial renovation of the Tysons-Pimmit Regional Library, which is located in the Dranesville District, now underway and the added amenities that it will provide to meet the needs of not only residents in the McLean area but also in Tysons. In the 2030-40 time frame, before moving the library, the option of further renovation of or an addition to the existing Tysons-Pimmit Regional Library should be assessed, as it could be more cost-effective. If renovation or expansion is not possible, any new regional library should be located to serve the needs of the communities that currently use the Tysons-Pimmit Regional Library as well as nearby Tysons residents. Locating it in the Tysons Central District 7 could disadvantage the Dranesville District communities that spearheaded its construction and that are the primary users of the library.

23. PAGE 134, URBAN DESIGN RECOMMENDATIONS, PEDESTRIAN REALM RECOMMENDATIONS, THIRD PARAGRAPH: Modify the last sentence, as follows: “The design of the public realm should be integrated with and complimentary to adjacent land uses, and include tree canopy requirements.

RATIONALE: An established tree canopy will help to unify the urban landscapes and ultimately provide aesthetic and stress-reducing functions.