• I am Sally Horn, Co-Chair of the MCA’s Tysons Liaison Committee and the Planning and Zoning Committee Tysons Sub-Committee. I am speaking on behalf of the four standing committees and two liaison groups of the MCA that have reviewed the Proposed Tysons Implementation Plan Amendment.

• We commend the PCTC’s work to reconcile the 2010 Tysons Comprehensive Plan Amendment text, maps and charts with the studies, planning activities and construction that have been completed since then.

• We are concerned, however, that certain of the proposed changes either would open up previously-settled policy or would encourage actions that are inconsistent with three key commitments made to the public:
  o First, to ensure that public infrastructure construction in Tysons proceeds in tandem with and is in place prior to development that yields major increases in intensity;
  o Second, to ensure that Tysons is a place where people can live, work and play; and
  o Third, to ensure that negative impacts on the surrounding communities are mitigated and that Tysons growth does not come at the expense of the quality of life in these communities.

• Since time is short, I will focus on our key concerns. The attachment to this statement provides a more complete exposition of MCA concerns, and suggestions to address them.

**Athletic Fields**

• MCA requests that you remove the following sentence that was added, beginning at the bottom of page 112 of the draft: “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.”

- From our perspective, this added language is inconsistent with the vision for Tysons as a place where people not only can work and live but also play. We also believe that it contravenes the commitments made to the public to place 20 athletic fields in Tysons and to limit any negative impacts on the surrounding communities, which would include from traffic congestion and facility location and/or use. (See Pages 7-11, Vision for Tysons).

- Placing athletic fields outside Tysons likely would undercut the attractiveness of Tysons as a place to live. It also would contribute to congestion since Tysons workers and residents would need to travel by car to those athletic 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, including McLean, which lack useable, sufficient available land to meet both Tysons needs and the needs of their communities.

- There also are practical limitations that must 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. The reduction was justified in the 2010 Plan by three factors that the Plan asserted would help ensure adequate field capacity in Tysons: (1) the use of field lighting; (2) the use of synthetic turf, and (3) scheduling that provides for longer and more efficient use of fields in urban settings.

- 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. Using 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 locations 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 and pay for three fields outside of Tysons.

• Also, from a strictly practical perspective, it has not been demonstrated in the Plan or elsewhere that sufficient usable vacant land exists outside of Tysons, including in McLean, to locate athletic fields to serve the needs of Tysons residents and workers as well as the needs of residents and workers in McLean and other adjacent communities. In this regard, it is worth noting that McLean’s athletic fields are already oversubscribed and that we have our own separate needs for additional fields.

• I know that some have argued that since McLean and Vienna youth sports leagues currently are the predominant users of the fields in Tysons, it would make more sense for Tysons developers to upgrade those fields rather than to build the full complement of required fields in Tysons. This argument misses the point – we are not planning for 2020 or even 2030; we are planning for the infrastructure required in 2050, when the demographics of Tysons – 200,000 employees and 100,000 residents -- will require at least 20 urban fields in Tysons to meet the needs of youth and adults who live and/or work in Tysons.

Libraries

• MCA requests that you strike the paragraph on page 118 that proposes that, sometime in the 2030-40 time frame, consideration be given to moving the Tysons-Pimmit Regional Library located in the Dranesville District to Tysons Central District 7 in the Providence District.

• Our request is based on the following two factors: (1) the renovation of the Tysons-Pimmit Regional Library, now underway, and the added amenities that it will provide, and (2) the negative impact on the Dranesville District communities that spearheaded its construction and that are the primary users of the library.
• In the 2030-40 time frame, before moving the library, the options of further renovation of or an addition to the existing Tysons-Pimmit Regional Library should be assessed, as either could be more cost-effective than moving the library.

• We have offered specific substitute language in our comments: “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.” (Comment #22)

Magarity Road

• One of the stated urban design principles is to respect the neighborhoods surrounding Tysons and, toward that end, to maintain the character and livability of the residential neighborhoods adjacent to and at the edge of Tysons (p. 133). How this principle is implemented in the design of Magarity Road is of particular to concern to MCA, and the Dranesville neighborhoods that are adjacent to and abut Magarity Road.

• Our residents are especially concerned that 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.

• Because of the significance of the maps in the Plan, we request that a footnote be added to Map 7 (page 66, Planned Tysons Road Network and Functional Classification), stating that Magarity Road is a special case. We have offered a footnote to Map 7 in our comments for your consideration: "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." (Comment # 17)
Initial Development Level (IDL) for Office Uses

• We do not support fully dropping the IDL or dropping the 2010 text that identified the criteria that must be met before the IDL should be lifted. That said, we would support adding 5 million square feet to the IDL to be available solely for redevelopment of the commercial strip malls on the south side of Route 7.

• We are concerned that the criteria have not been fully met and that absent criteria, the balance between office and residential uses established in the 2010 Plan will not be achieved, more office and less residential development will occur, and traffic congestion will be exacerbated.

• The 2010 Tysons Comprehensive Plan Amendment stated that:
  o “The following criteria should be considered when determining an increase in the initial development level for office uses: (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.

• With regard to these four criteria:
  o Some progress has been achieved toward the realization of the Tysons vision.
  o While market demand for office space is down based on overall vacancy rates, it will not likely remain at current levels indefinitely.
  o We believe that the County does not yet have sufficient data to confidently ascertain that going forward, there will be the necessary balance between land use and transportation as called for in the Plan, 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.

- Moreover, 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.

- Finally, once the PC and BOS have authorized office use in a rezoning case, we believe it would be extremely difficult if not impossible under Virginia law to rescind that authorization.

- Our comments include suggested alternate language relating to the IDL: “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.” (Comment # 11)

Traffic Demand Management and Build-out to 84 million Square Feet

- We appreciate that the draft Plan recognizes the need to monitor achievement of the TDM goals and the reference to Table 5, which stipulates the goal for build-out of Tysons to 84 million square feet. However, we believe that the text needs to be more explicit.
• The traffic studies that informed the adopted 2010 Plan 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). In light of this assessment, and to avoid catastrophic failure of major roadways, the County concluded that at 84 million square feet of building 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, McLean, Vienna, and the Providence District, and also on the economic viability of Tysons and public safety.

• We recommend adding an additional sentence to the text to underscore the importance of being able to achieve the TDM requirement. We have suggested language in our comments: “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.” (Comment # 12)

Metrics

• We very much appreciate the extensive discussion of metrics throughout the draft Plan. These metrics and the monitoring provisions outlined in the Plan are essential for tracking how well we are doing and making necessary adjustments to achieve the Vision for Tysons.

• That said, we would recommend some strengthening of the discussion and have provided some suggestions in our comments.