Tyson's Corner Comprehensive Plan Amendment Sierra Club Statement April 21, 2010

The Sierra Club, speaking for the 3500 members of the Great Falls Group, is supportive of the broad vision and level of development advanced by staff and the Tyson's Corner Committee of a vibrant urban center that is a desirable place to live with the full range of activities, and is highly accessible by many travel modes. There are many good features in this plan.

While recognizing the vision for full development of Tyson's Corner is targeted for 2050, we support the shorter planning horizon of 20 years aimed at completing an interim level of development for a couple reasons. First, there is less uncertainty in the shorter period which lowers the risk of error. Second, it provides the county more flexibility later when additional planning would have to occur. Among the Intensity Alternatives (Pgs 28-29) 3 and 4 reflect the 20-year horizon. Of those options we support 3A provided some changes (noted below) are made regarding transportation project schedules. If the suggested changes cannot be made, we would support 4A. Another alternative was presented to the Tyson's Committee by staff on April 15, but is not reflected in the plan text. We believe some aspects of that approach, such as treating office different from residential, may have merit.

We are hopeful adjustments can be made to permit this shorter-term plan to be implemented without losing the longer-term vision. In that regard, we have identified two concerns we want addressed. One is about the pattern of development. The other is transportation. We feel very strongly that development must be concentrated within the half-mile radii of the station areas. While that has always been the intent of the Tyson's Committee, it may be even more important in a shortened horizon because other aspects of the plan may be delayed such that the idea of concentration becomes more critical.

Throughout the planning process, the greatest attention has been placed on land use aspects aimed at establishing an urban environment, which is good. But transportation has been dealt with as one among several infrastructure elements. If Tysons is to become an urban <u>center</u>, it

should be envisioned as a hub, it must be well connected in all directions to other centers. As such residents, workers and visitors should see Tysons as a transit community. Therefore, we should create the expectation and reality sooner, not later.

The transportation analysts and VDOT now agree that the final vision is not possible without additional high-quality transit and a very robust bicycle network, not only within Tysons, but extending to other locations beyond its borders. Some of this transit should be in place as close as possible to the opening of the Silver Line because we need to move people from several directions into and out of Tyson's but also because we need to change the commuting patterns at Tysons. However, Table 8 includes "Neighborhood bus routes" (2013-2020) and shows only the circulators plus I-66 and I-95/I-495 (which become BRT routes after 2020). We suggest the section on transit in the 2013-2020 period be expanded to include high-quality express buses (if not legitimate BRT) to HOT-Lane accessible destinations along I-495, to I-270, and on major arterials such as Rts 7 and 123. Indeed, the TIGER grant obtained by the Council of Governments covers one of these, Rt 7 east, and VDOT noted the need in the 527 report. Another route to consider for an early bus upgrade, at least as an interim measure, is along Gallows Road to Merrifield (or beyond).

Recognizing transit can take years to plan, our support for both planning horizons is contingent on the county making a firm commitment to adding additional transit, both bus and a north-south rail line, i.e. the Purple Line, and one other line TBD to other regional activity centers prior to the anticipated 2030 replanning point. Such transit planning must begin immediately after this plan is approved.

We remain concerned that Table 8 continues to show an early reliance in road expansion which could contribute to inducing more driving, thereby worsening mobility. Making Tyson's functional will be aided by giving pedestrians and bicycle riders priority over cars. One major solution is to reduce the cross-sectional width of the boulevards planned for Rts 7 and 123, so they will be less dangerous to cross.

We are pleased the Tyson's Metro Access Plan for infrastructure improvements is now being developed, but the Comprehensive Plan should show these improvements are needed much earlier. The county should perform a traffic impact evaluation of earlier completion of the non-auto network and the possibility that some of the road expansions could be dropped for a net avoidance of cost and impervious surface. This is a low-risk approach because it would be far easier to correct for than the case in which more highways than necessary were built.

Creating a transit-oriented development hinges greatly on establishing a balance among several critical elements, such as among the mix of uses as well as the balance between development and the supporting infrastructure. Under the 20-year horizon it will be important to drive the existing imbalances toward the intended balances in a very proactive approach to phasing. The Implementing Entity, or Partnership, is properly identified to preside over the monitoring of various data elements as stated in the land use chapter. Certain characteristics of interest (COI) for Tyson's should be identified and derived from the data, such as: travel mode shares; categories of uses including residential, commercial, retail and community or public uses; jobs to housing ratios; and breakdowns by district and TOD/non-TOD areas where development is occurring. Additionally, the Partnership should prepare information on infrastructure expenditures such as the street grid and bicycle/pedestrian facilities while noting where each is occurring.

Some measured characteristics have stated numerical goals for the final year of the planned horizon. The Partnership should develop trend lines between the current and targeted goals of the 20-year horizon for each of the COI. Some trends may be ratios or other composites between pairs of values which are determined to best inform the Partnership. As the plan undergoes implementation, the partnership should update the current values for each trended COI, as well as an estimation of what the values will be upon completion of submitted development applications. The values should be compared to the appropriate point on the established trend line for each COI. If one or more COI have deviated more than (for example) 10% from the

expected point on the trend line, new development should be postponed pending a Board-approved plan for correcting those factors. All data from monitoring, processing and comparisons shall be open and available to the general public.

Regarding the phasing language in the draft plan, we see merit in each of the Alternatives A-D (Pgs 37-40), and believe elements of several could be used. For example, a Tyson's-wide CDA could be used for improvements which have broad significance such as stormwater or the circulator. While others such as public facilities, including schools and parks, might be better covered by a district CDA. Phasing development with infrastructure is essential, but it must be more than transportation, although it might be important to be more precise for transportation.

Regarding the Partnership makeup as stakeholders, we believe the composition should include representatives of the regional interest, the surrounding neighborhoods and the environment. The Partnership should have first review of zoning applications, precipitate and provide oversight on consolidations and manage the TDM program. The charter stating their authority is weak, and should be more defined.

Lastly, we support the requirement for mandatory green building at the Silver level with bonuses for higher levels. If the residential requirements are incorporated up front as opposed to being an add-on to a building design, we do not believe it will add greatly to the cost for developers.

We commend the Planning Commission, the Task Force and the Citizens for providing a highquality process and product for planning this important part of our region.

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