



FAIRFAX
COUNTY

STAFF REPORT

V I R G I N I A

PROPOSED ZONING ORDINANCE AMENDMENT

Article 11 – Regional Mall Parking Rates

PUBLIC HEARING DATES

Planning Commission

November 13, 2019 at 7:30 p.m.

Board of Supervisors

December 3, 2019 at 4:00 p.m.

**PREPARED BY
ZONING ADMINISTRATION DIVISION
DEPARTMENT OF PLANNING AND DEVELOPMENT
703-324-1314, AND**

**PERMITTING AND CODE ADMINISTRATION
LAND DEVELOPMENT SERVICES
703-324-3065**

October 15, 2019

MAD



Americans with Disabilities Act (ADA): Reasonable accommodation is available upon 48 hours advance notice. For additional information on ADA call 703-324-1334 or TTY 711 (Virginia Relay Center).

STAFF REPORT

STAFF RECOMMENDATION

Staff recommends that the Board of Supervisors (the Board) adopt the proposed amendment as set forth in this Staff Report dated October 15, 2019.

BACKGROUND

The proposed amendment was developed in response to a request by the Board of Supervisors (Board) on February 5, 2019, directing staff to review the current parking requirements for regional malls in excess of 800,000 square feet of gross floor area (gfa) to determine if a lower rate is appropriate. This request was added to the 2019 Zoning Ordinance Priority Work Program.

The Board's request noted that organizations such as the Urban Land Institute, the International Council of Shopping Centers, and the Institute of Transportation Engineers acknowledge a trend in reduced parking demand for retail developments. For example, while the current parking supply at the Fair Oaks Mall addressed typical seasonal demand in the 1980s and 1990s, less than 70 percent of that supply would be needed to accommodate peak demand for holiday shopping today, according to data submitted by the property owner of the mall, the Taubman Company.

Reducing required parking is expected to help the County meet several key goals, ranging from reducing environmental impacts, including stormwater runoff and heat island effects, to better utilization of mall property, to creating a more pedestrian-friendly context that supports transit and other sustainable transportation modes. Changes to the parking requirements for large regional shopping centers could potentially impact all four of the County's regional malls – Fair Oaks, Springfield Town Center, Tysons Corner Center, and Tysons Galleria.

Conventional malls composed of multiple large-format anchor stores, a food court, and in-line shops surrounded by surface parking have responded to changing retail trends by trying to reinvent themselves to remain competitive. Malls around the United States are repurposing underused surface parking areas for redevelopment activities including the addition of new residential and commercial development, urban plazas, and enhanced design for pedestrian activities. Locally, Tysons Corner Mall and Springfield Town Center have similar approved plans for redevelopment that utilize surface parking. These redevelopments also take advantage of nearby alternative transportation modes which further reduces parking demand.

Fair Oaks Mall is also currently looking at redevelopment opportunities and an evaluation of the parking rates is viewed as critical to ensure the long-term vitality of the mall.

In an effort to expedite this analysis of parking rates for regional shopping centers with 800,000 square feet or more of gfa, County staff, working with Fair Oaks Mall and other regional centers, partnered with Nelson/Nygaard, part of the Clarion team assisting the County with the zMOD effort, to undertake this independent review of parking rates for large regional shopping centers. A copy of the Nelson/Nygaard report is included as Attachment A to the Staff Report.

DISCUSSION

Currently, the Zoning Ordinance provides for a tiered parking rate for shopping centers based on the total gfa for the shopping center as follows:

- A. 100,000 square feet of gfa or less: 4.3 spaces per 1,000 square feet of gfa
- B. Greater than 100,000 but equal to or less than 400,000 square feet of gfa: 4.0 spaces per 1,000 square feet of gfa
- C. Greater than 400,000 but less than 1 million square feet of gfa: 4.8 spaces per 1,000 square feet of gfa,
- D. 1 million square feet of gfa or more: 4.0 spaces per 1000 square feet of gfa

The above parking requirement is applicable to all uses in a shopping center, except that the area occupied by offices, restaurants or restaurants with a drive-through establishment that exceeds 5000 square feet of gfa, and hotels is parked separately in accordance with the applicable standards for those uses as set forth in Article 11-104, Minimum Required Spaces for Commercial and Related Uses.

According to the Urban Land Institute, shopping centers are defined as follows by floor area size:

- Community Shopping Center: <400,000 gross leasable area (gla)
- Regional Shopping Center: 400,000 to 600,000 gla
- Super Regional Shopping Center: >600,000 gla

In order to bring the County's large commercial shopping center size categories generally in line with industry standards, it is recommended to modify the minimum shopping center threshold in Paragraph D from 1 million square feet of gfa to 800,000 square feet of gfa and to modify the maximum shopping center threshold for Paragraph C from 1 million square feet of gfa to 800,000 square feet of gfa. This accounts for converting from gla to gfa as currently defined in the Ordinance and will provide Fairfax County's largest commercial retail centers additional flexibility to react to a changing retail marketplace.

The County's consultant, Nelson/Nygaard, collected data from other US jurisdictions on trends in changes to retail parking rates and reviewed the parking demand information submitted by the Taubman Company, owners of Fair Oaks Mall. The Taubman Company commissioned an analysis of mall parking demand during the 2017 and 2018 holiday seasons at Fair Oaks Mall, when annual peak parking occurs. The analysis found that less than 65 percent of the available spaces on the mall site were occupied during the peak of peak occupancy. As part of the analysis, staff also requested Nelson/Nygaard to conduct a parking demand study of Springfield Town Center. This was completed in August 2019. The consultant then projected holiday demand at this center and anticipates that, at 100% occupancy of the available retail space, approximately 65% of the parking spaces will be full during the peak of peak occupancy. This information is summarized in Table 1 below.

Table 1 Existing Conditions Summary

	Parking Required by Code	Existing Parking Supply	Peak Weekday Parking Utilization			Peak Weekend Parking Utilization		
			Total	% Occ	Per 1000 sf gfa	Total	% Occ	Per 1000 sf gfa
Fair Oaks Mall (1.79 million sf gfa)	4/ 1000gfa*							
December 2018 Surveys**	7,610	7,736						
- At then 85% tenant occupancy			2,793	36%	1.56	4,363	56%	2.44
- At 100% tenant occupancy			3,260	42%	1.82	5,092	66%	2.84
December 2017 Surveys**	7,610	7,736						
- At then 90% tenant occupancy			2,585	33%	1.44	4,864	63%	2.72
- At 100% tenant occupancy			2,847	37%	1.56	5,356	69%	2.99
Springfield Town Center (1.69 million sf gfa)	4/ 1000gfa*							
June 2019 Surveys	7,559	7,588						
- At current 91% tenant occupancy			2,331	31%	1.38	3,312	44%	1.96
- At 100% tenant occupancy			2,562	34%	1.52	3,640	48%	2.15
December Projections***	7,559	7,588						
- At current 91% tenant occupancy			3,100	41%	1.83	4,405	58%	2.60
- At 100% tenant occupancy			3,407	45%	2.01	4,841	64%	2.86

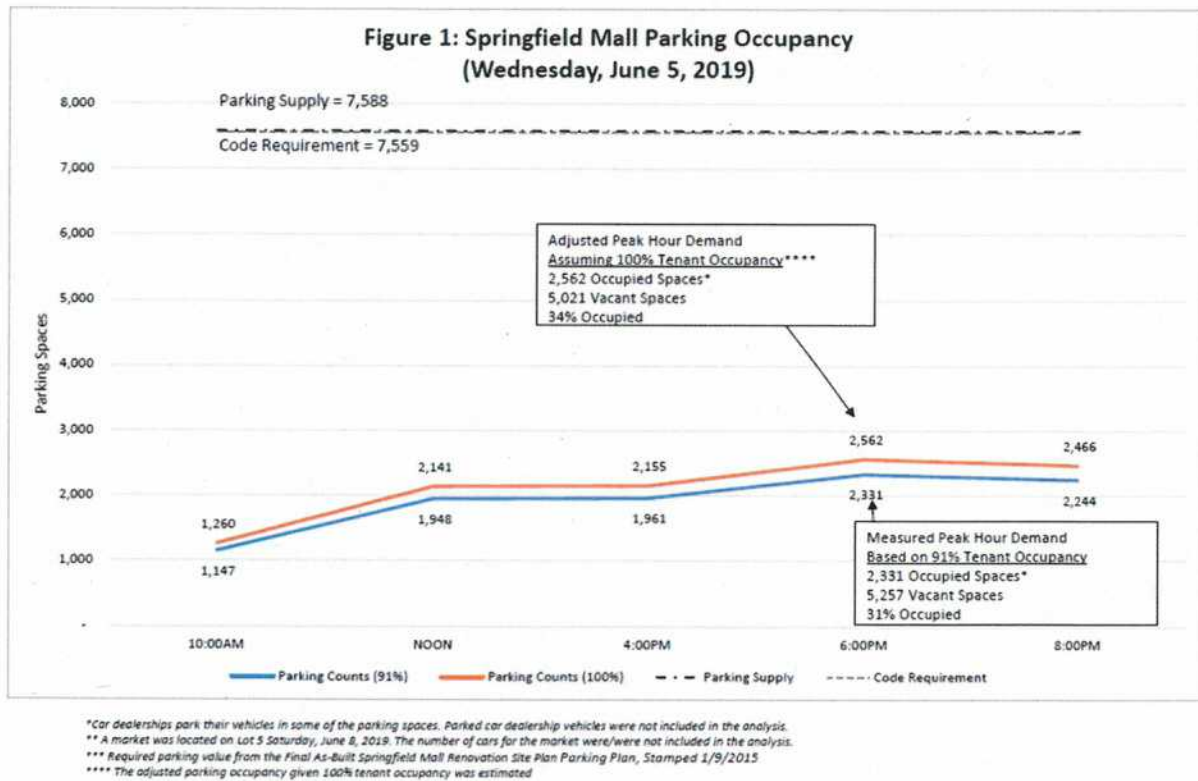
*Required for Shopping Centers with greater than 1,000,000 gfa (not including supporting uses such as restaurants, movie theaters, etc)

** Surveys undertaken by Fair Oaks Mall Owners Consultants

*** December projections for Springfield Town Center utilize ULI monthly parking demand factors

An examination of current and recent parking utilization at Fair Oaks Mall and Springfield Town Center shows peak occupancy for a limited time period in a single day of approximately 2.8 spaces per 1000 square feet of retail development. However, during most of the year, parking demand is much less. Typically, parking is not designed to address peak demand but, instead, average demand. Infrequent times of peak demand may create a tight parking supply with difficulty finding a space, but the tradeoff is a right-sized parking facility for 90 percent of its operational time. An oversupply of parking is an inefficient use of land resources and creates environmental, design, and aesthetic issues. Figure 2 below shows parking demand in June 2019 for the Springfield Town Center which demonstrates the underutilization of parking supply occurring at regional mall sites today. Overall, parking demand at these sites is

declining. This is a trend that is expected to continue even at economically healthy malls.



Nelson/Nygaard's analysis recommends that the County consider reducing its minimum parking requirement for large regional malls within a range of 2.5 – 3.0 parking spaces per 1000 square feet of retail development. The 2.8 spaces per 1000 square feet previously discussed represents peak parking during December, which is typically the highest demand period for parking. Staff has advertised the range of 2.5 – 3.0 spaces per 1000 square feet of gfa to allow maximum flexibility for the Board's consideration. However, as an interim first step, staff believes a rate of 2.8 spaces per 1000 square feet of gfa for shopping centers with 800,000 square feet or more of gfa is reasonable and will address the oversupply of parking currently experienced at our regional malls. This topic will be revisited during Phase II of the County's zMOD effort which will include a broad review of all the parking rates within Article 11 of the Zoning Ordinance.

STAKEHOLDER OUTREACH

In addition to a presentation to the Board's Development Process Committee on September 10, 2019, the proposed amendment was included as a discussion topic during the Zoning Open House held at the South County Government Center on September 10, 2019. The amendment was also discussed with stakeholders at the zMOD citizen and land use attorney's working group. In addition, the Nelson/Nygaard Report was presented to all four mall property owners for their review and input.

CONCLUSION

The proposed amendment lessens parking requirements for retail developments over 800,000 square feet of gfa. This provides greater flexibility for existing retail development of this type to repurpose parking areas which will provide economic, environmental, and public welfare benefits. The analysis supports a significantly lower minimum parking ratio for large regional malls in Fairfax County. Therefore, staff recommends adoption of a minimum parking requirement of 2.5 - 3.0 spaces per 1,000 square feet of gfa for shopping centers of 800,000 square feet or more of gfa, with an effective date of 12:01 am the day following adoption.

**PROPOSED ZONING ORDINANCE AMENDMENT
CHAPTER 112 OF THE FAIRFAX COUNTY CODE**

This proposed Zoning Ordinance amendment is based on the Zoning Ordinance in effect as of October 15, 2019, and there may be other proposed amendments which may affect some of the numbering, order or text arrangement of the paragraphs or sections set forth in this amendment, which other amendments may be adopted prior to action on this amendment. In such event, any necessary renumbering or editorial revisions caused by the adoption of any Zoning Ordinance amendments by the Board of Supervisors prior to the date of adoption of this amendment will be administratively incorporated by the Clerk in the printed version of this amendment following Board adoption.

1 Amend Article 11, Off-Street Parking and Loading, Private Streets, Part 1, Off-
2 Street Parking, as follows:

3
4 - Amend Sect. 11-104, Minimum Required Spaces for Commercial and Related
5 Uses, by revising Paragraph 23, to read as follows:

6
7 23. Shopping Center:

- 8
9 A. 100,000 square feet of gross floor area or less: ~~Four and three tenths (4.3)~~
10 spaces per 1000 square feet of gross floor area
11
12 B. Greater than 100,000 but equal to or less than 400,000 square feet of gross
13 floor area: ~~Four (4)~~ spaces per 1000 square feet of gross floor area
14
15 C. Greater than 400,000 but less than ~~800,000~~1,000,000 square feet of gross
16 floor area: ~~Four and eight tenths (4.8)~~ spaces per 1000 square feet of gross
17 floor area
18
19 D. ~~800,000~~1,000,000 square feet of gross floor area or more: ~~Four (4)~~ 2.8
20 spaces per 1000 square feet of gross floor area *[Advertised to permit the*
21 *Board to consider a rate from 2.5 spaces up to 4.0 spaces per 1000 square*
22 *feet of gross floor area]*
23

24 For purposes of determining whether Par. A, B, C or D above is applicable, the
25 size of the shopping center is based on the definition of gross floor area as set
26 forth in Article 20, and includes any gross floor area devoted to offices,
27 restaurants, restaurants with drive-through and hotels. The gross floor area
28 calculation as qualified in Sect. 102 above is used to determine the required
29 number of parking spaces.

30 The off-street parking requirement set forth above applies to all uses in
31 a shopping center, except that the area occupied by offices, any restaurant or
32 restaurant with drive-through establishment that exceeds 5000 square feet of

1 gross floor area, and hotels is parked in accordance with the applicable
2 standards for such uses as set forth in this Section. For shopping centers subject
3 to Par. A, B or C above, the area occupied by theaters is parked in accordance
4 with the applicable shopping center requirement; however, for theaters with
5 more than 2000 seats, an additional three-tenths (0.3) space must be provided
6 for each seat above 2000 seats. For shopping centers subject to Par. D above,
7 the area occupied by theaters is parked in accordance with the applicable
8 shopping center requirement; however, for theaters with more than 750 seats,
9 an additional six (6) spaces must be provided for each 100 seats above 750 seats.

10 In addition, for all shopping centers, stacking spaces as required by this
11 Part must be provided for those uses which have drive-in or drive-through
12 facilities. Spaces designated for curb-side pickup cannot be counted toward the
13 minimum required number of parking spaces.



MEMORANDUM

To: Leslie Johnson, Fairfax County Zoning Administrator
From: Nelson\Nygaard
Date: August 20, 2019
Subject: Development of recommended minimum parking ratios for large commercial retail properties in Fairfax County

1 INTRODUCTION

BACKGROUND

In early February 2019, the Fairfax County Board of Supervisors directed the County Department of Planning and Zoning to review current parking requirements for regional malls, those in excess of 800,000 square feet (sf) of gross floor area (gfa). This work was added to the Zoning Ordinance Priority Work Program, as part of the Zoning Ordinance Modernization (zMOD) process and contract. This direction came in response to a proposal from the Taubman Companies, owners of Fair Oaks Mall, that the County evaluate its minimum parking requirements for large commercial properties, to recognize current and future conditions in way that could allow owners of those properties to better match the amount of parking they provide to that desired by their customers.

As Commissioner Herrity noted in directing this review, “Fair Oaks Mall is surrounded by a sea of asphalt” which is never more than 70% occupied with parked vehicles. Reducing this oversupply could help the County meet several key goals, ranging from the economic health of such regional malls, to reducing environmental impacts including stormwater runoff and heat island effects, to creating more walking-friendly contexts that support transit and other sustainable transportation modes. Changes could potentially impact all four of the County’s regional malls – Fair Oaks, Springfield Town Center, Tysons Corner Center, and Tysons Galleria. All four property owners welcome this review of minimum parking ratios for shopping centers of 800,000 sf and larger.

PURPOSE

The purpose of the parking requirement review is to develop recommended minimum parking ratios for large commercial retail properties in Fairfax County. Upon review by staff, a recommendation would be provided to the Board of Supervisors for possible action.

APPROACH

Nelson\Nygaard's approach, developed in consultation with County DPZ staff, was to analyze current and potential future demand for parking, using existing and newly collected utilization data from the County's regional malls. This direct, local experience was compared to current practices in other jurisdictions to ensure the recommendation reflects national trends in parking policy as well.

2 PLANNING CONTEXT

In the mid-1990's the number of conventional shopping malls in the U.S. peaked at over 1,500, while the intervening years have seen that number drop by over 1/3 to 1000. Conventional malls composed of multiple large-format anchor stores, a food court, and inline shops surrounded by surface parking have responded to retail trends by trying to reinvent themselves to remain competitive. For example, Fair Oaks has changed its tenant mix, has an 85% tenant occupancy, remains in a strong position but continues to have a low daily parking demand. Other malls have worked to remain relevant by using mixed-use strategies to build "downtowns" within the mall. Examples include the following:

- Many malls have repurposed underused parking lots to host regular and special events. For example, Springfield Town Center in Fairfax County, Smith Haven Mall in New York, and Everett Mall in Washington state host weekly farmers' markets, annual car shows, weeks-long circus residencies, and summer concert series.
- Northgate Mall outside Seattle devoted its two southern parking quadrants into 1200 condominium units aimed at residents 55 years old and older.
- The Streets at Southpoint in Durham, NC, developed a walking-friendly outdoor component and continues to replace parking with expanded outdoor options and new residential and commercial development.

Within Fairfax County, the four regional malls have observed shifting shopping (and parking) patterns in recent years and responded in different ways according to their context. The two Tysons malls are part of the coordinated Tysons Corner Urban Center plan, which envisions a future far less dependent on parking. Springfield Town Center has planned for the addition of some 800,000 sf of office space alongside residential and hotel units. Despite the rapidly changing context, the four regional malls remain competitive, with all recently above 90% occupancy.

However, the need for repurposing of vacant commercial space is an issue that the Board of Supervisors has recently addressed with an amendment of the Comprehensive Plan. In October 2018 the Board approved County staff's proposal to amend the comprehensive plan to allow non-office commercial buildings to be repurposed for different but compatible uses. This enables alternative uses for former retail spaces such as offices, public or institutional uses like an art

Minimum Parking Ratios – Large Commercial Retail Properties
Fairfax County, VA

gallery or library, indoor recreation, medical and healthcare uses, community colleges and training centers, and temporary or pop-up uses.

Currently, Article 11 of the County's Zoning Ordinance outlines required minimum off-street parking spaces accessory to the Shopping Center use, differentiated by size:

- 100,000 sf gfa or less: Four and three-tenths (4.3) spaces per 1000 sf gfa
- Greater than 100,000 but equal to or less than 400,000 sf gfa: Four (4) spaces per 1000 sf gfa
- Greater than 400,000 but less than 1,000,000 sf gfa: Four and eight tenths (4.8) spaces per 1000 sf gfa
- 1,000,000 sf gfa or more: Four (4) spaces per 1000 sf gfa
- The off-street parking requirement applies to all uses in a shopping center, except the area occupied by offices, any restaurant or restaurant with drive-through establishment that exceeds 5000 square feet of gross floor area, and hotels. These uses are parked in accordance with the applicable standards for such uses in the Zoning Code.

These parking space ratios are generally higher than current industry standard requirements, and in the range of the requirements imposed by adjacent jurisdictions:

Industry Standards

- Institute of Transportation Engineers Parking Generation Manual (5th Edition)
 - Non-December: 1.95 vehicles (weekdays) / 2.91 vehicles (Saturday) per 1000 sf of gross leasable area (gla)
 - December: 3.77 vehicles (weekdays) / 4.58 vehicles (Saturday) per 1000 sf gla
- Urban Land Institute Shared Parking 2nd Edition: 3.20 spaces per 1000 sf gla (weekday – regional mall) 3.60 spaces per 1000 sf gfa (weekend- regional mall)

Local Jurisdictions

- Arlington County, VA – 1 space per 250 sf gfa, or 4 spaces per 1000 sf gfa
- Montgomery County, MD – 5 spaces per 1000 sf gfa (all retail outside of Parking Lot Districts)
- Prince William County, VA - 1 space per 250 net sf, or 4 spaces per 1000 net sf (properties over 300,000 sf gfa) – note that net area omits some unleaseable space, meaning this requirement will produce fewer than 4 spaces per 1000 sf gfa
- Loudoun County, VA - 4.25 spaces per 1000 sf gfa (properties over 600,000 sf gfa)

Nationwide there are few examples of jurisdictions that have modified their zoning ordinances specifically to reflect lower parking requirements for retail and shopping centers. More jurisdictions have chosen to eliminate minimum requirements completely, at least in some districts, typically downtowns or other transit-oriented areas. These examples include:

Minimum Parking Ratios – Large Commercial Retail Properties
Fairfax County, VA

- City of Portland, OR: In some zones, minimum of 1 space per 500 sf gfa and maximum 1 space per 196 sf gfa (5.1 spaces per 1000 sf gfa). In other zones, no minimum number of spaces.
- City of Pittsburgh, PA: Minimum of 1 space per 500 sf gfa (above first 2,400 sf) and maximum 1 per 175 sf gfa (5.7 spaces per 1000 sf gfa).
- City of Richmond, VA: Minimum of 1 space per 300 sf gross leasable area (3.3 spaces per 1000 sf gla). With a typical ratio for malls of gla being 85% of gfa, this equates to roughly 2.8 spaces per 1000 sf gfa. No minimums in specific districts.
- City of Buffalo, NY: No parking minimums.
- City of Hartford, CT: No parking minimums.

From this review we see a range of minimum required parking from zero to 2.8 spaces per 1000 sf gfa, and maximums from 5.1 to 5.7 spaces per 1000 sf gfa.

3 EXISTING CONDITIONS

The Nelson\Nygaard team received parking inventory and utilization data for Fair Oaks Mall, collected by the property owner in December 2017 and December 2018. This data was supplemented with inventory and utilization data for Springfield Town Center, collected by Nelson\Nygaard on behalf of Fairfax County in June, 2019. These data provide existing conditions for two of the four regional malls in the County, and thus insight into current parking conditions and trends.

Table 1 below summarizes the existing parking conditions at Fair Oaks Mall and the Springfield Town Center. The full data summaries are included as Appendix A.

Minimum Parking Ratios – Large Commercial Retail Properties
Fairfax County, VA

Table 1 Existing Conditions Summary

	Parking Required by Code	Existing Parking Supply	Peak Weekday Parking Utilization			Peak Weekend Parking Utilization		
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*Required for Shopping Centers with greater than 1,000,000 gfa (not including supporting uses such as restaurants, movie theaters, etc)

** Surveys undertaken by Fair Oaks Mall Owners Consultants

*** December projections for Springfield Town Center utilize ULI monthly parking demand factors

The surveys of Fair Oaks Mall took place in December 2017 and December 2018. Over that 12-month period the peak parking occupancy (at 100% tenant occupancy) declined by 264 spaces (to 66%) on the weekend but a 5% increase in the peak weekday occupancy (to 42%).

Fair Oaks Mall and Springfield Town Center differ in their transportation context in some important ways. Fair Oaks is largely surrounded by limited-access and arterial roads and service from the three bus routes is adjacent to the Mall. Springfield is located within a short walk from the Franconia-Springfield Metrorail station, and is served by seven bus lines. The transit access decreases the demand for parking at Springfield Town Center. As a result of decreased demand, the mall owner currently leases parking spaces to local dealerships for vehicle storage, and leases part of one garage for commuter parking. In the recent utilization survey, car dealership storage amounted to 336 vehicles during the weekday peak and 348 during the weekend peak. These vehicles were not included in the parking utilization summarized in Table 1. Commuter parking is available on designated levels of the parking garage, and comprises 500 undesignated spaces as per agreement with the Fairfax County Department of Transportation. For that reason, they can

Minimum Parking Ratios – Large Commercial Retail Properties
Fairfax County, VA

not be easily separated from mall parking and the parking utilization in Table 1 therefore includes commuter parking. Field observations and data collected by garage floor level show that the parking levels designated for commuter parking were less than 10% occupied on both weekday and weekend. However, this will result in an overstatement of the real demand for mall parking when looking at Table 1.

Based on the existing conditions, both the regional malls surveyed showed parking utilization well below the minimum requirements of the current Zoning Ordinance. Table 2 below highlights the required Zoning Ordinance minimum off-street parking spaces accessory to the Shopping Center use compared to the surveyed conditions.

Table 2 Zoning Ordinance Minimum Off-Street Parking Comparison

Location	Shopping Center Size	Zoning Ordinance Minimum Parking	Current Peak Weekday*	Current Peak Weekend*
Fair Oaks Mall December 2018 Surveys	1.79 million gsf	4 spaces per 1000gsf	1.82 spaces per 1000gsf	2.84 spaces per 1000gsf
Springfield Town Center December Projections	1.69 million gsf	4 spaces per 1000gsf	2.01 spaces per 1000gsf	2.86 spaces per 1000gsf

*Based on 100% tenant occupancy and December Surveys/Projections

4 SUMMARY AND RECOMMENDATION

This analysis supports a significantly lower minimum parking ratio for large regional malls in Fairfax County. An examination of current and recent parking utilization at two of the four such malls shows peak occupancy of approximately 2.8 spaces per 1000 sf gfa, and a declining trend that can be expected to continue even at economically healthy malls. A review of current practice in other jurisdictions nationwide shows generally lower minimum requirements, in some cases (especially in more urban and transit-oriented locations) removing the minimums entirely and imposing maximums.

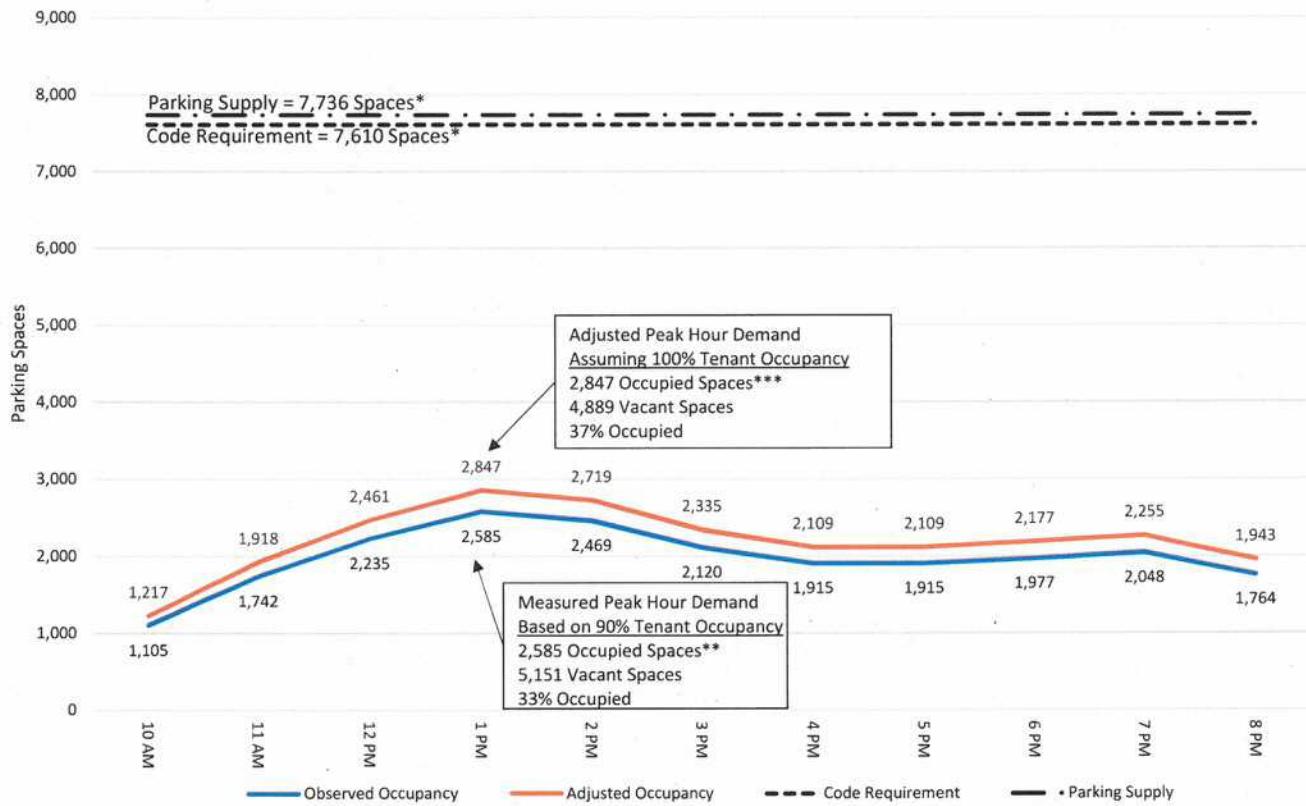
It is noted however, that both the tenant mix of regional malls and time of year is an important consideration in relation to parking demand. The mix of accessory uses incorporating office, restaurants and entertainment can influence the parking demand with those larger than 5,000 gsf required to park at their own applicable standards. This typically lowers the parking demand of the mall uses themselves. Additionally, the year sees parking demand peak during the December holiday period with lows during summer weekdays.

Our resulting recommendation is that Fairfax County consider reducing its minimum parking requirement for large regional malls within a range of 2.5 – 3.0 parking spaces per 1000 sf gfa. This recommendation range if implemented would result in continuing to oversupply parking at peak demand on weekdays and weekends over 350 days out of the year. On peak December weekends, parking demand could approach capacity at fully leased malls.

Appendix A Mall Parking Data

Fair Oaks Mall Parking Data

**Figure 1: Fair Oaks Mall Parking Occupancy
(Thursday, December 7, 2017)**

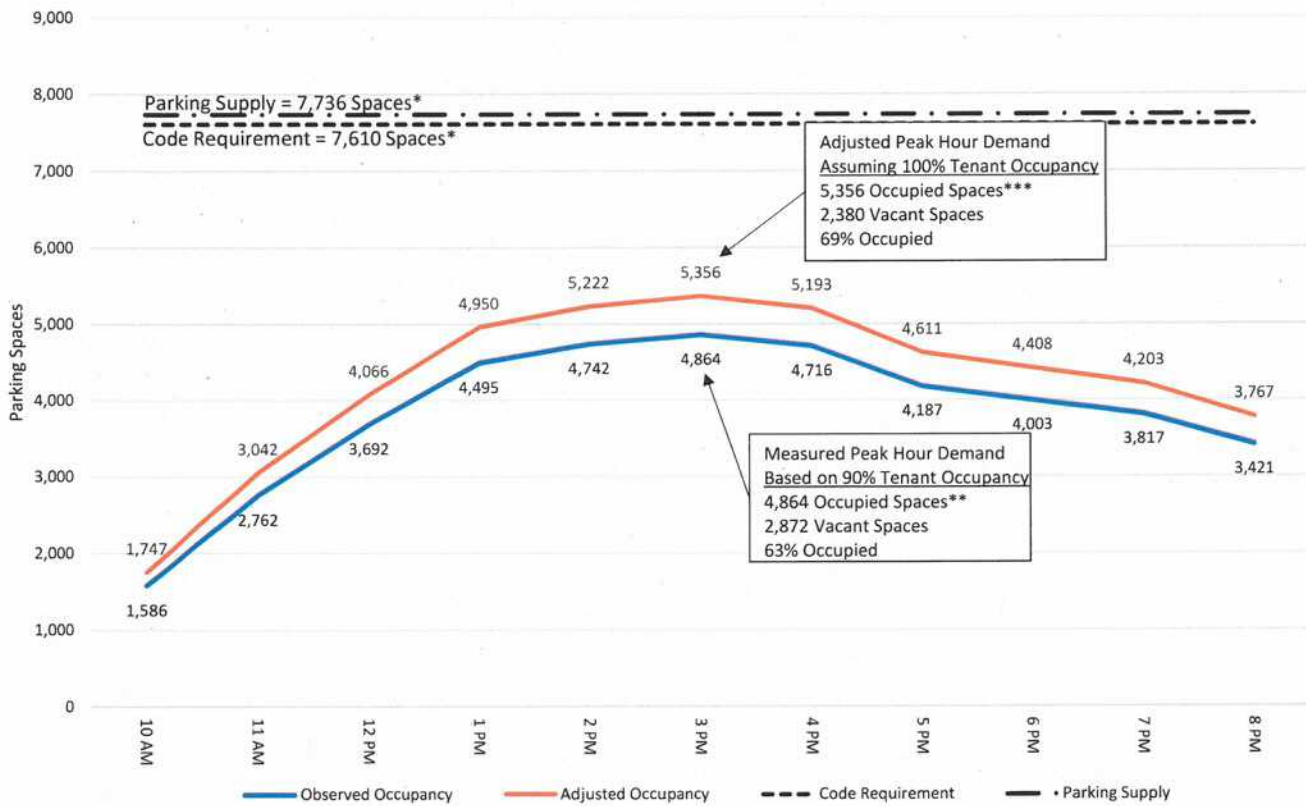


* - Parking supply and code requirement numbers based on latest parking tabulation (2509-PKS-012-2) by Walter L. Phillips, Inc dated August 3, 2017 and approved on August 17, 2018

** - Measured parking occupancies include only Fair Oaks Mall Areas A thru R.

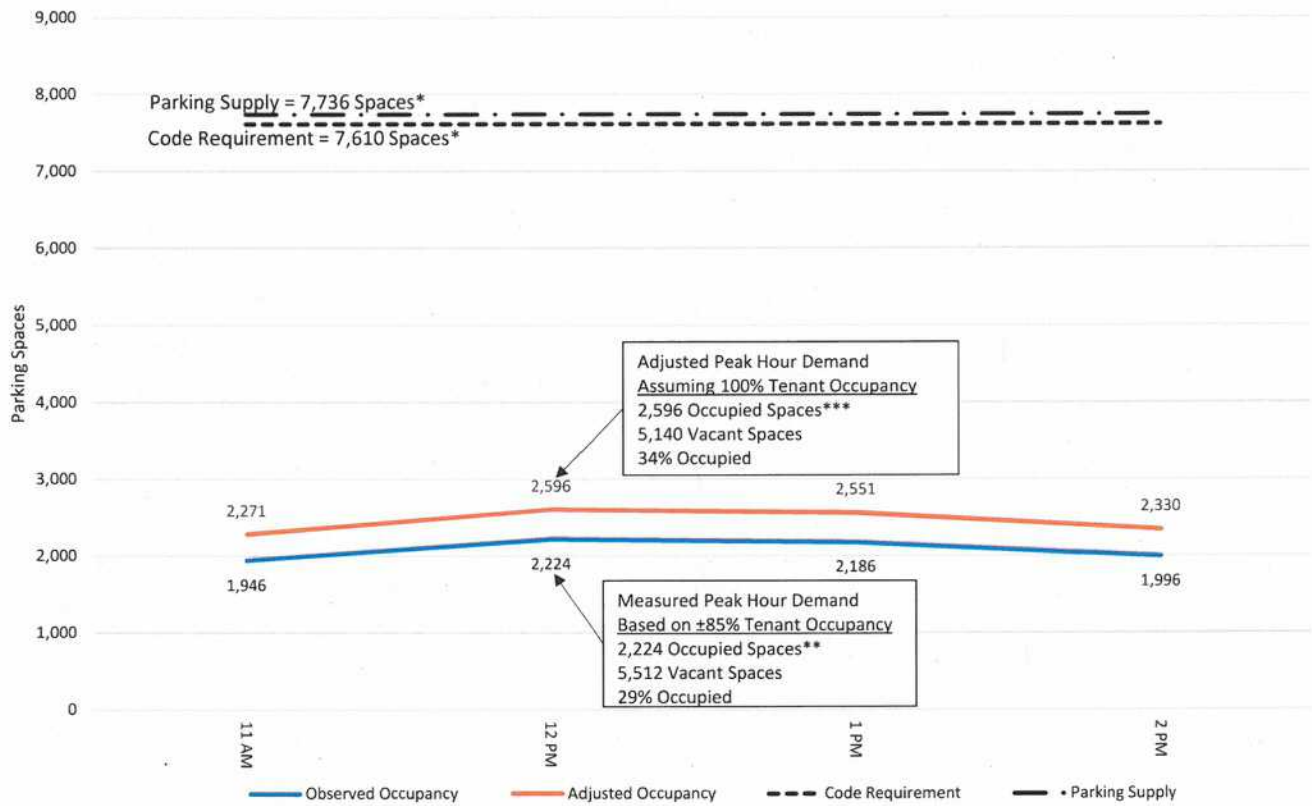
*** - Parking occupancy and code requirement adjusted based on an approximately 90% tenant occupancy at the time of the parking count.

**Figure 2: Fair Oaks Mall Parking Occupancy
(Saturday, December 16, 2017)**



* - Parking supply and code requirement numbers based on latest parking tabulation (2509-PKS-012-2) by Walter L. Phillips, Inc dated August 3, 2017 and approved on August 17, 2018
 ** - Measured parking occupancies include only Fair Oaks Mall Areas A thru R.
 *** - Parking occupancy and code requirement adjusted based on an approximate 90% tenant occupancy at the time of the parking counts.

**Figure 3: Fair Oaks Mall Parking Occupancy
(Thursday, December 6, 2018)**

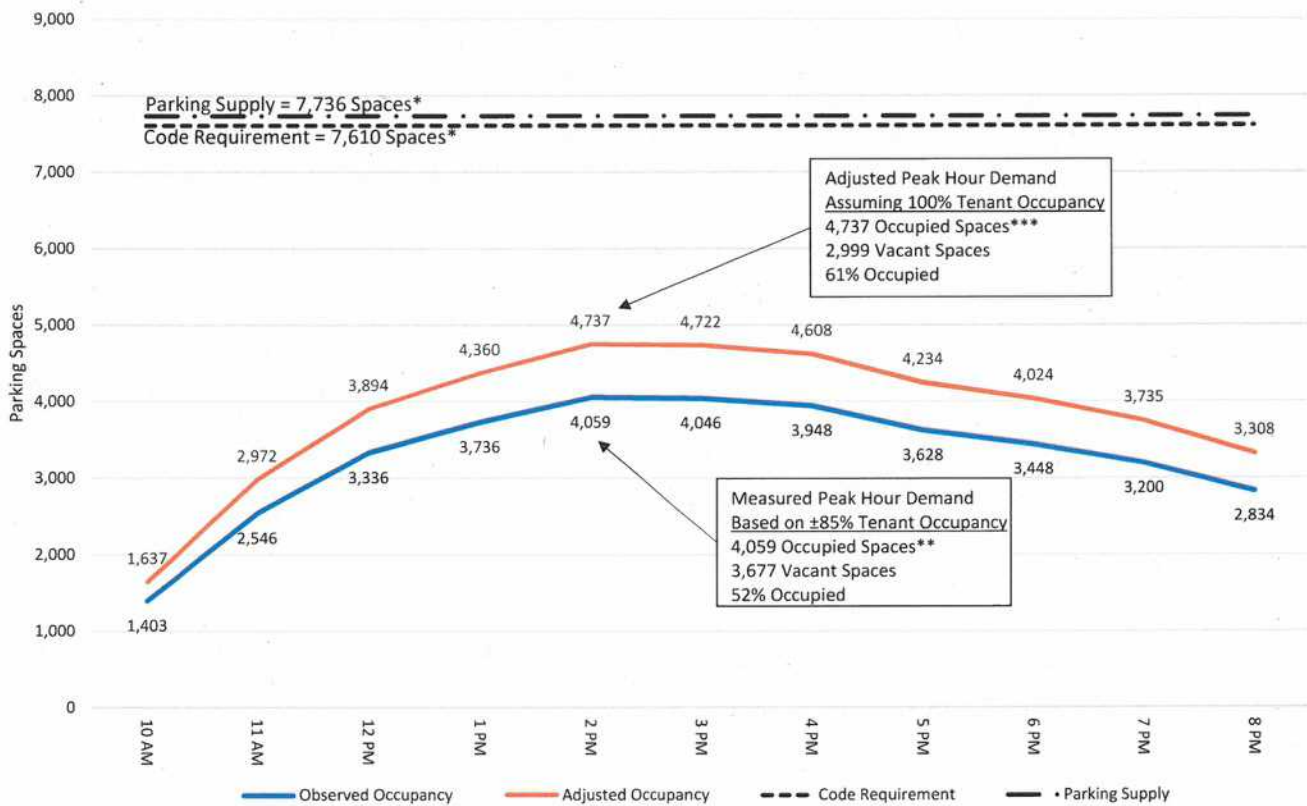


* - Parking supply and code requirement numbers based on latest parking tabulation (2509-PKS-012-2) by Walter L. Phillips, Inc dated August 3, 2017 and approved on August 17, 2018

** - Measured parking occupancies include only Fair Oaks Mall Areas A thru R.

*** - Parking occupancy and code requirement adjusted based on an approximately 85% tenant occupancy at the time of the parking count.

**Figure 4: Fair Oaks Mall Parking Occupancy
(Saturday, December 8, 2018)**

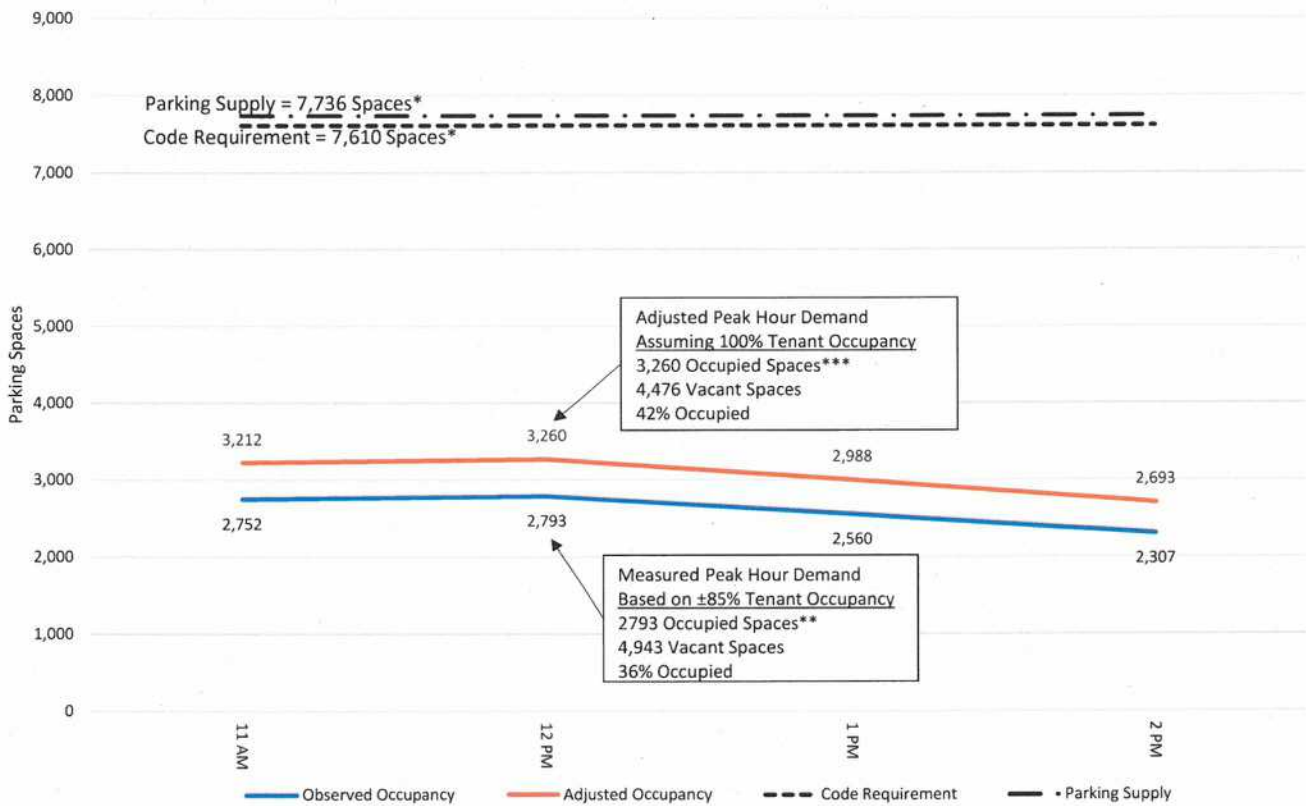


* - Parking supply and code requirement numbers based on latest parking tabulation (2509-PKS-012-2) by Walter L. Phillips, Inc dated August 3, 2017 and approved on August 17, 2018

** - Measured parking occupancies include only Fair Oaks Mall Areas A thru R.

*** - Parking occupancy and code requirement adjusted based on an approximate 85% tenant occupancy at the time of the parking counts.

**Figure 5: Fair Oaks Mall Parking Occupancy
(Thursday, December 13, 2018)**

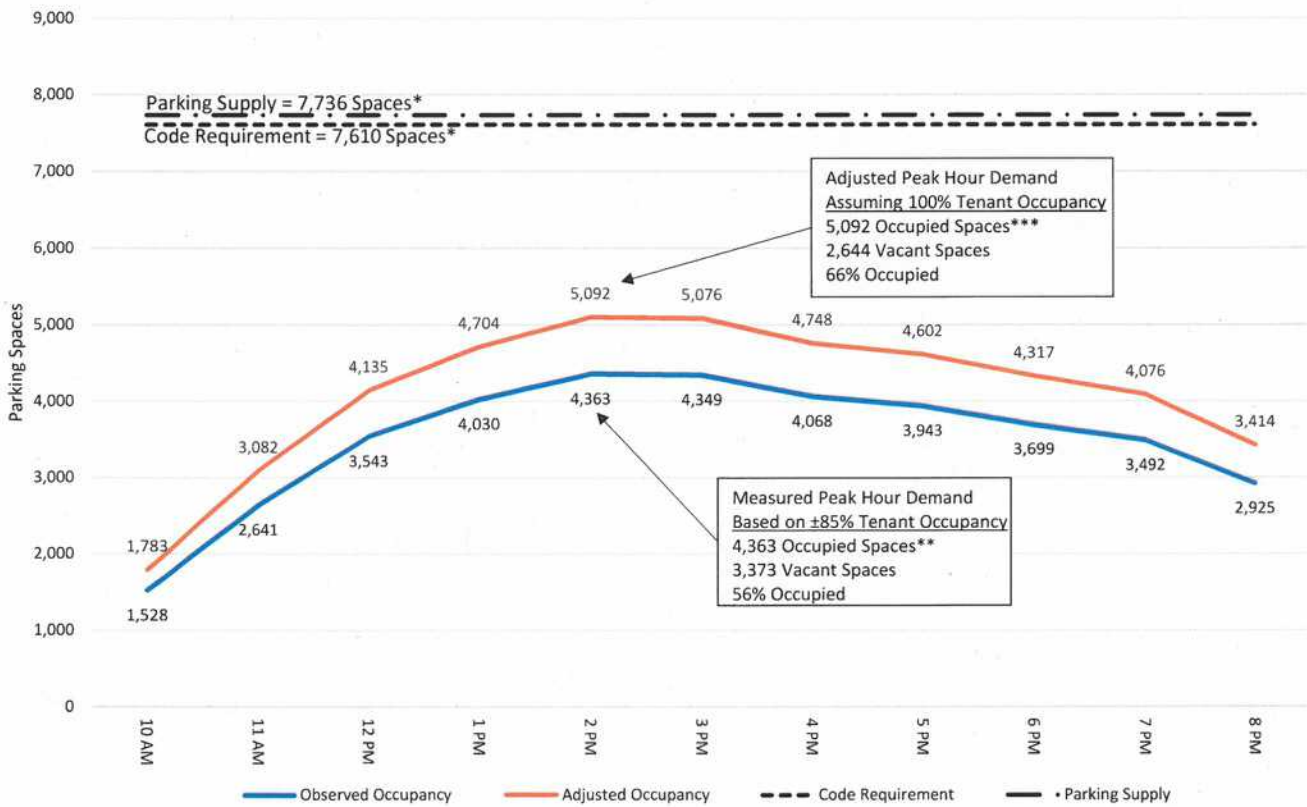


* - Parking supply and code requirement numbers based on latest parking tabulation (2509-PKS-012-2) by Walter L. Phillips, Inc dated August 3, 2017 and approved on August 17, 2018

** - Measured parking occupancies include only Fair Oaks Mall Areas A thru R.

*** - Parking occupancy and code requirement adjusted based on approximately 85% tenant occupancy at the time of the parking count.

**Figure 6: Fair Oaks Mall Parking Occupancy
(Saturday, December 15, 2018)**



* - Parking supply and code requirement numbers based on latest parking tabulation (2509-PKS-012-2) by Walter L. Phillips, Inc dated August 3, 2017 and approved on August 17, 2018

** - Measured parking occupancies include only Fair Oaks Mall Areas A thru R.

*** - Parking occupancy and code requirement adjusted based on an approximate 85% tenant occupancy at the time of the parking counts.

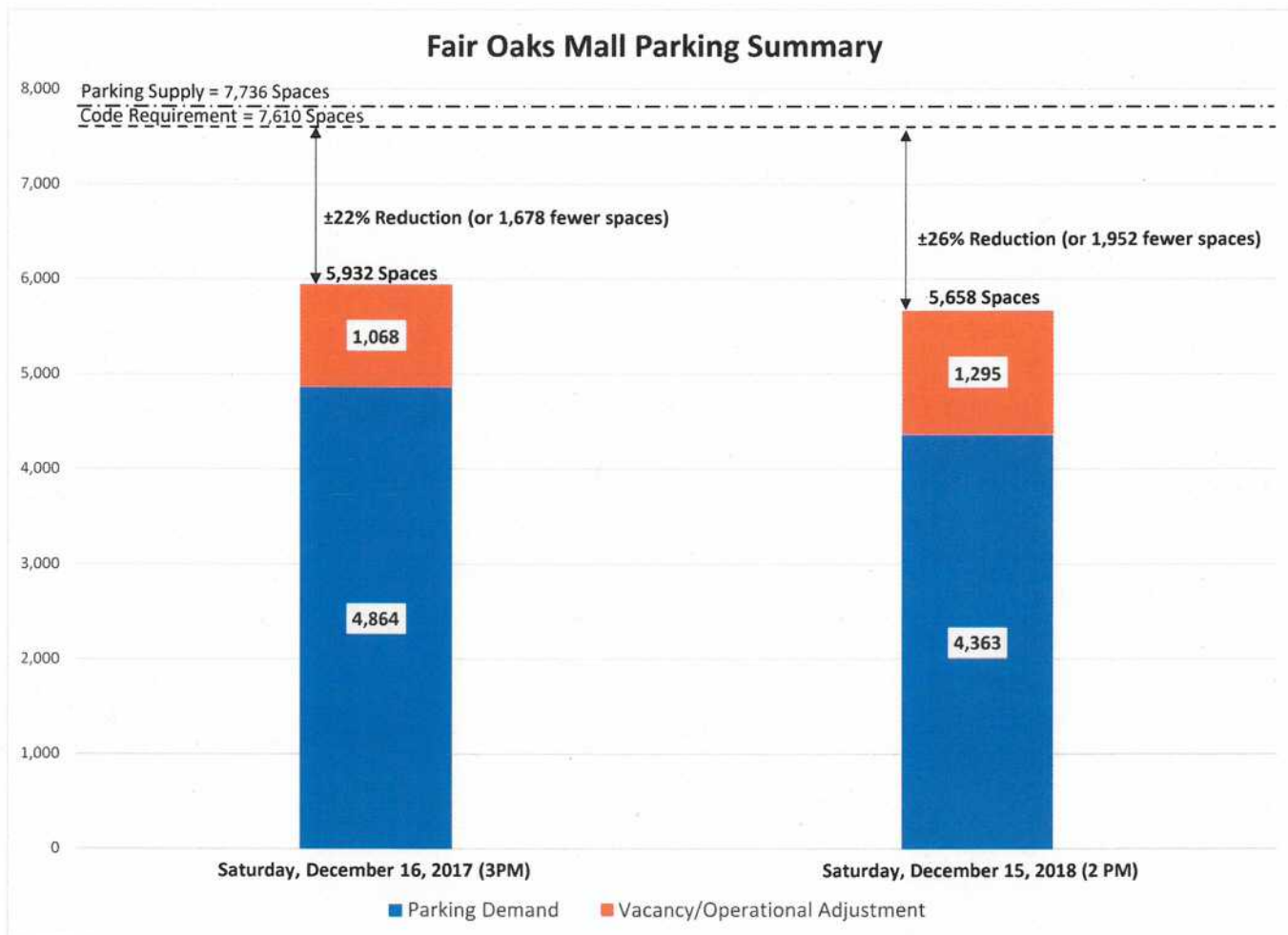


EXHIBIT 4

O:\PROJECTS\7001 - 7500\7377 FAIR OAKS MALL\GRAPHICS\7377 FAIR OAKS MALL PARKING GRAPHICS (2.14.2019).DWG



Figure 1
Parking Location Map

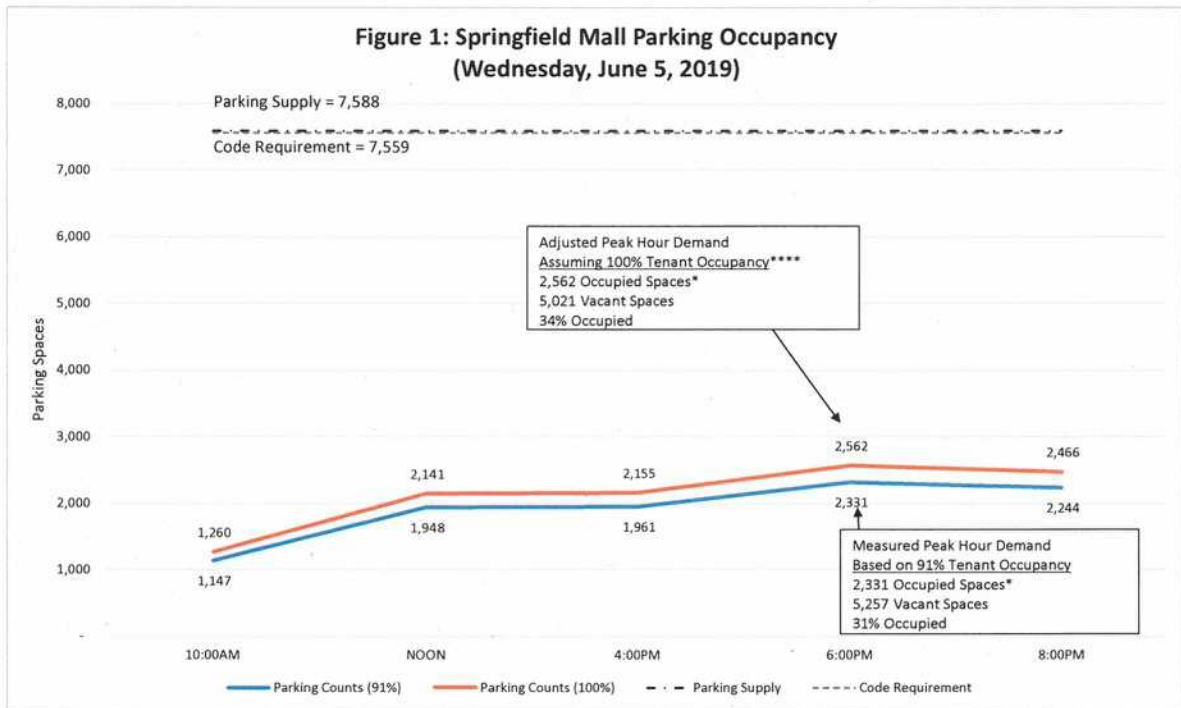
Dec. 2017
Dec. 2018
##% / ##%


NORTH
Fair Oaks Mall
Fairfax County, Virginia



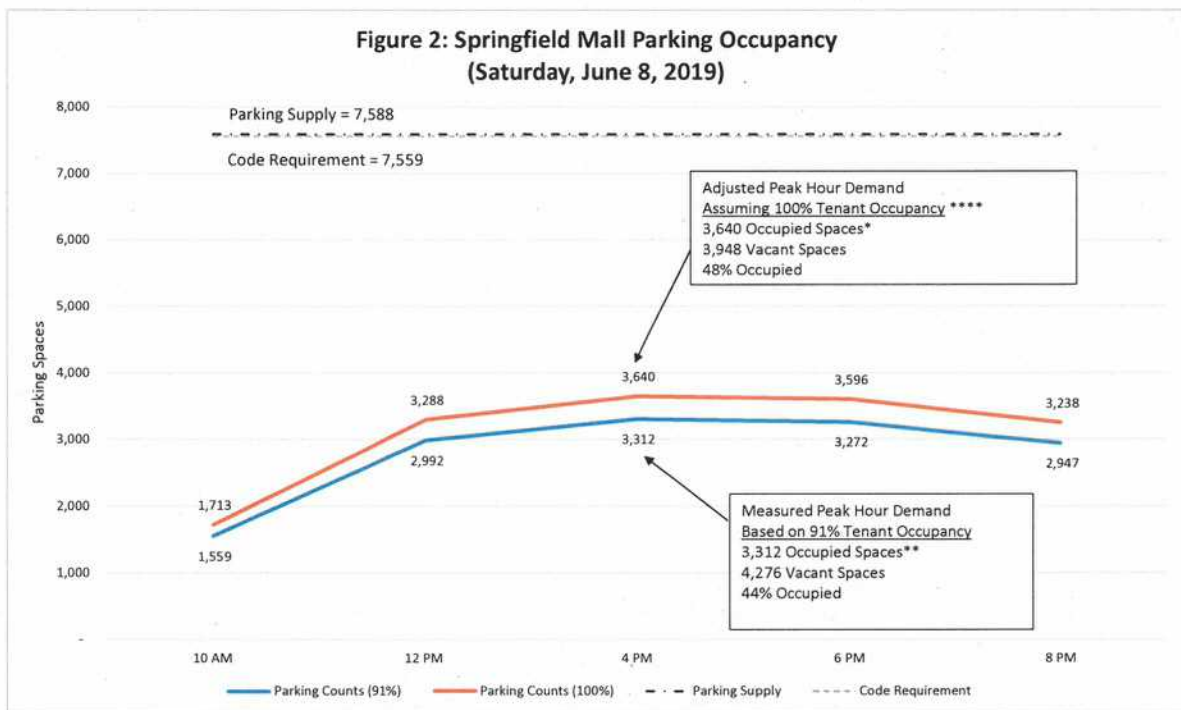
Springfield Town Center Parking Data

**Figure 1: Springfield Mall Parking Occupancy
(Wednesday, June 5, 2019)**



*Car dealerships park their vehicles in some of the parking spaces. Parked car dealership vehicles were not included in the analysis.
 ** A market was located on Lot 5 Saturday, June 8, 2019. The number of cars for the market were/were not included in the analysis.
 *** Required parking value from the Final As-Built Springfield Mall Renovation Site Plan Parking Plan, Stamped 1/9/2015
 **** The adjusted parking occupancy given 100% tenant occupancy was estimated

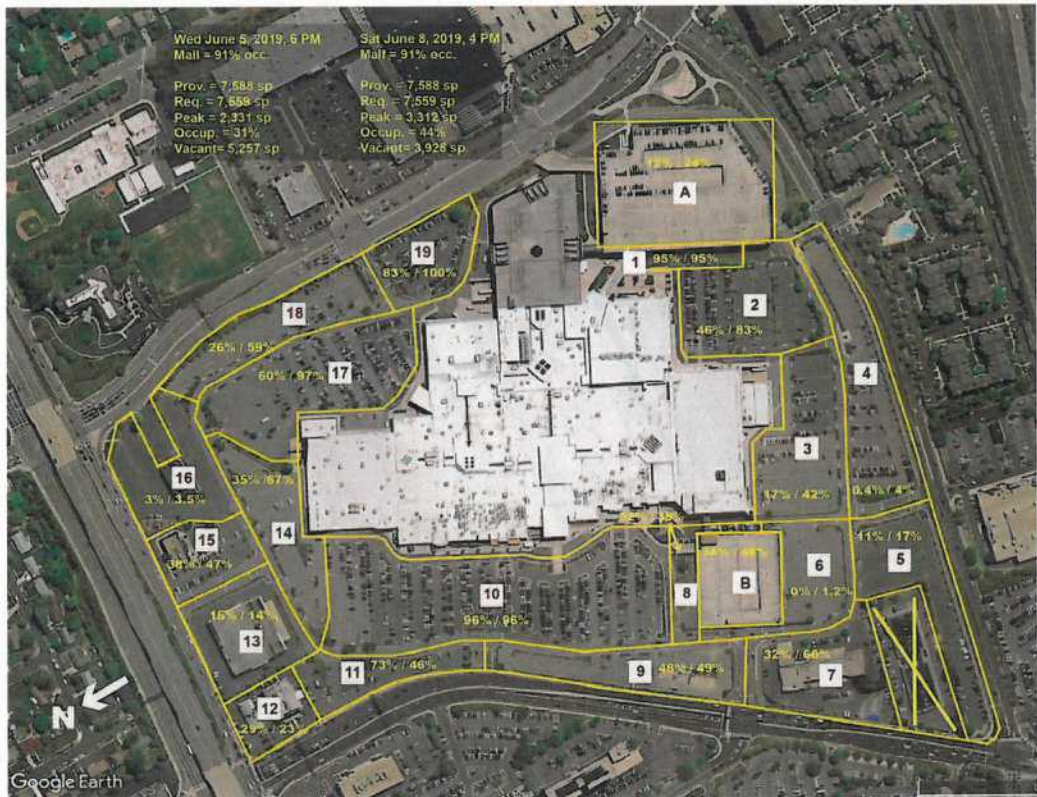
**Figure 2: Springfield Mall Parking Occupancy
(Saturday, June 8, 2019)**



*Car dealerships park their vehicles in some of the parking spaces. Parked car dealership vehicles were not included in the analysis.
 ** A market was located on Lot 5 Saturday, June 8, 2019. The number of cars for the market were/were not included in the analysis.
 *** Required parking value from the Final As-Built Springfield Mall Renovation Site Plan Parking Plan, Stamped 1/9/2015
 **** The adjusted parking occupancy given 100% tenant occupancy was estimated

Parking Occupancy Summary By Lot

##% / ##%
 |
 | Saturday June 8, 2019
 |
 | Wednesday June 5, 2019



*Car dealerships park their vehicles in some of the parking spaces. Parked car dealership vehicles were not included in the analysis.

** A market was located on Lot 5 Saturday, June 8, 2019. The number of cars for the market were/were not included in the analysis.

*** Required parking value from the Final As-Built Springfield Mall Renovation Site Plan Parking Plan, Stamped 1/9/2015