

COMMENTS OF GREATER TYSONS CONCERNED CITIZENS ON PROPOSED CHANGES TO THE COMPREHENSIVE PLAN FOR TYSONS

The GTCC (Greater Tysons Concerned Citizens) respectfully submits its comments on the proposed revisions (September 15, 2015) to the Comprehensive Plan for Tysons (“Plan”). As the County is aware, the GTCC was formed, in early 2008, to “assist public discussion of the proposed redevelopment of Tysons Corner and its likely impact on surrounding communities.” It consists of the McLean Citizens Association, Town of Vienna, Providence District Council, the Hunter Mill Defense League and interested residents of Fairfax County.

The current mission and focus of the GTCC reads as follows:

We have a vested interest in Tysons’ success. Our Mission and Focus are to monitor Tysons Comprehensive Plan implementation and its amendments, as Tysons redevelops, and to advocate and to collaborate with other stakeholders to protect the interests and concerns of surrounding communities. The major, but not exclusive, areas of interest and concern are:

- Transportation;
- Adequate infrastructure and public facilities;
- Land use and rezoning;
- Parks and recreation;
- Financing; and
- Schools.

The GTCC’s comments are divided into two sections. The first is major concerns. The second is comments on specific text in the September 15, 2015 draft.

Major Concern – Initial Development Level

The GTCC supports a modest 5 million square foot (“MSF”) increase in the Initial Development Level for commercial property (“IDL”), but only for new development south of Route 7. The GTCC opposes eliminating the IDL altogether.

In June 2010, the Fairfax County Board of Supervisors (“BOS”) adopted Amendments to the Plan. Among the amendments was an IDL for the total amount of office use built and approved. The IDL is set at 45 MSF. The County is considering a staff proposal to eliminate the IDL. Language addressing the IDL from the existing Plan follows.

Initial Development Level

To implement the first 20 year increment of the ultimate vision for Tysons, the total amount of office uses built and approved in the entire urban center should not exceed an initial development level of 45 million square feet. This amount is the office component of the high forecast for the year 2030 prepared for Fairfax County in 2008 by George Mason University’s Center for Regional Analysis. Office floor area that should be counted toward the initial development level includes all existing office buildings and any office development that is approved through a proffered rezoning, a special exception, or a by-right site plan. Office floor area reserved for public facility bonuses should also be counted toward the initial development level. Tysons Comprehensive Plan, at p. 24.

The Land Use and Transportation sections of the Areawide Recommendations provide guidance on monitoring activities that will be necessary to track development performance. Monitoring will also be essential to future planning efforts. A particular condition to be monitored is the achievement of transportation improvements needed to mitigate the impacts of new development. If a reliable mechanism for funding these improvements needed beyond the year 2030 is established, then the initial development level of 45 million square feet of office uses may be increased through a Tysons-wide or area-specific Plan amendment. Plan, at p. 26.

The following criteria should be considered when determining an increase in the initial development level for office uses:

- Progress achieved toward the realization of the vision for Tysons;
- Market demand for office space, as demonstrated by new building construction, vacancy rates, and revised forecasts;
- Balance between land use and transportation, including the provision of infrastructure and achievement of vehicle trip reduction levels identified for the year 2030 and TDM performance that exceeds the targets outlined in Table 5 in the Transportation section; and
- Funding arrangements for transportation improvements and programs, so that timely completion of improvements identified for the period beyond 2030 can confidently be expected.

A Tysons-wide summary of existing and approved development based on information provided by the county should be included with all rezoning applications in Tysons. Ibid.

The Plan should be regularly monitored, and development approvals, site plans, and occupancy permits should be continuously tracked to facilitate monitoring activities. The Comprehensive Plan for Tysons should be reviewed regularly, and the review process should consider the data collected through monitoring activities with the expected outcomes described in the Plan. Careful consideration should be given during this review process as to whether the amount and location of planned development potential should be modified. Examples of appropriate times for Plan review include when 45 million total square feet of office uses are approved through the zoning process; when 10 million square feet (of any use) zoned under this Plan are built; or as needed, based on events such as the completion of Phase 2 of the Silver Line or the implementation of other transit projects that serve Tysons. Plan, at p. 32

Considering all of the changes since 2010 in perspective of a multi-decade implementation period, it is uncontested that it is too early to consider eliminating the IDL. While a transportation funding plan has been adopted, multiple rezoning applications have been granted; some construction has occurred; and necessary accessions to public facilities and amenities have begun to appear, the redevelopment of Tysons is in its infancy. The progress to the “realization of the vision for Tysons” is limited and insufficient to warrant eliminating the IDL. The County should take a detailed assessment of the progress for purposes of evaluating the IDL no sooner than 2025 – fifteen years after the revised Plan was adopted. Note our recommendation for a review comes five years earlier than the existing Plan contemplates. Eliminating the IDL now based on the first factor would be premature.

Due to the “Great Recession,” federal budget sequestration and other spending reductions, and changed office space management (resulting in smaller offices), the market demand for office space in Tysons is weak. With few exceptions, generally related to single business’ office consolidation, there has been no new office building construction. Vacancy rates in Tysons are significant, with approximately 4 MSF vacant as of early fall 2015. The second factor for lifting the IDL has not been satisfied.

Tysons has seen considerable residential construction, which will help reduce the rate of growth of traffic problems and some transportation improvements have started to appear. But there is no data showing “TDM performance that exceeds the targets outlined in Table 5.” Also, the provision of much of infrastructure identified for the year 2030 has yet to be accomplished and the achievement of vehicle trip reduction levels identified for the year 2030 has yet to be demonstrated. The third factor for lifting the IDL has not been satisfied.

There has been good progress in obtaining funding for Table 7 projects. However, it is simply too early to conclude “timely completion of improvements identified for the period beyond 2030 can confidently be expected.” The fourth factor for lifting the IDL has been only partially satisfied.

The Tysons vision calls for maintaining a jobs/housing balance. Plan, at p.6. Eliminating the IDL now in its entirety would eliminate a major safeguard towards assuring that the Tysons vision is achieved.

Unless the County intends to break faith with the public by eliminating its promise to keep the IDL until the four factors have been satisfied, it cannot fairly and justly lift the IDL at this time. However, the GTCC recognizes that, despite the Plan’s contemplation that there would be significant new commercial construction south of Route 7, which could not occur with the existing IDL, we support amending the IDL to allow no more than 5 MSF of net, additional commercial development only south of Route 7. As a result, the amended IDL would be 50 MSF.

Major Concern – 84 MSF Trigger

The GTCC expresses strong concern that the County has already approved total development that exceeds the 84 MSF Trigger because the County’s own data shows major transportation failure¹ will occur at that level of development, which, in turn, will cascade throughout not only Tysons, but also to neighboring communities. Eliminating the 84 MSF trigger will cause a decrease in the quality of life for Tysons and its neighbors. The GTCC opposes the elimination of such trigger and expects the County to adopt appropriate protections to prevent transportation failure to the extent it allows 84 MSF or more to be built.

Key to the success or failure of Tysons is a development level (for all uses) of 84 MSF. 84 MSF is the highest level of development forecasted by George Mason University (“GMU”) for 2030. Plan, at pp. 29-30, 41. This development level was used by the County in its 527 Transportation Impact Analysis submission to VDOT (Dec. 2009). The same development level informed the transportation infrastructure requirements contained in Table 7 of the Plan.

For example, Section I of Table 7 lists projects that must be completed by 2013. Section II shows projects needed between 2013 & 2020 for Tysons to reach 60 MSF. Next, Section III sets forth those projects required for growth to reach 84 MSF (2020-2030). Finally, Table 7’s Section IV lists what must be provided to reach 113 MSF feet – the ultimate growth limit – by 2050. Time limits are estimated and will be adjusted as market forces speed or slow real estate development.

What is essential to note is that, with the exceptions of adding one more Beltway lane (southbound from Route 7 to I-66); finishing certain ramps to and from the Dulles Toll Road; and completion of the grid of streets as Tysons is built out, all development beyond 84 MSF must be accommodated by transit and TDM. County Staff summarized this in a July 2009 presentation to the

¹ The term “transportation failure” means the point at which develop at or beyond 84 MSF produces consistent gridlock on Routes 7 & 123, the Beltway and the Dulles Toll Road.

PCTC. See pages 6 and 7. Page 6 explains what must be done to bring development to 84 MSF and concludes “Further highway capacity improvements are limited.” Page 7 displays the following.

Beyond 2030 Analysis - Rationale

Accommodating Growth Beyond 2030:

- Total vehicle trips to and from Tysons are kept constant at 2030 level by:
 - Increased transit use
 - Increased efficiencies due to improved traffic management

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Also, it is important to note that growth beyond the 84 MSF trigger (estimated 2030) requires expansion of the Orange Line (likely to Centreville or Manassas) and the construction of another yet-unspecified rail line. Plan, at p. 69. Many believe expansion of the Orange Line would require an additional Potomac River crossing, which could be very expensive, if a tunnel, or controversial, if a bridge. Satisfaction of the additional rail transit requirements is far from certain.

The “bottom, bottom line” is each new single occupant vehicle (“SOV”) after 84 MSF must be cancelled by a non-SOV trip. In other words, someone (Person A) must get out of her/his automobile and take transit, join a car pool, bike or walk to work for another person (Person B) to drive solo to Tysons. There can be no net, new SOV trips to Tysons. If these goals (indeed, mandates), are not achieved, the transportation network in and around Tysons will fail consistently and constantly. The spillover effects for Tysons residents, workers, business tenants, landowners, neighboring communities, and the County itself, will be disastrous. A Tysons transportation network collapse is a disaster that must be prevented.

Notably, VDOT stated, based on the County’s Tysons Central, West, and East Consolidated Traffic Impact Analyses (“CTIAs”), that the 2030 GMU land use figures (48,070,757 Total Tyson office square feet, 90,957,701 Total Tyson all land use square feet) represent the “maximum level of development that can be supported by the existing and proposed transportation infrastructure.” VDOT letters to FCDOT re the CTIAs, dated 12/4/13, 10/16/13, and 4/22/13.

It is extremely disappointing that the County appears to have ignored the 84 MSF cap already by approving rezoning applications that are permitted to build to a net 92 MSF (based on calculations made by the GTCC, using data from the County’s website), with more rezoning applications likely. This constitutes a breach of trust and an open invitation for a continuous transportation catastrophe. How can the County ensure every SOV trip for the 8 MSF between 84 MSF and the already approved 92 MSF will be cancelled by a non-SOV trip? The GTCC opposes the elimination of such trigger and expects the County to adopt appropriate protections to prevent transportation failure to the extent it allows 84 MSF or more to be built.

The Plan states that phasing of development is essential to assure provision of public facilities (Plan, at p.18) and that provision of transportation infrastructure and the achievement of trip reduction objectives can be thought of as triggers that should occur in concert with future growth (Plan, at p. 29). Eliminating the concept of an interim total development level, such as the 84 MSF trigger, as the draft September 11, 2015 Plan Amendment proposes to do, would remove another major safeguard to assure

that development in Tysons occurs in a balanced, phased manner and does not get ahead of provision of public facilities and of meeting transportation objectives.

Major Concern – Breaking Faith with the Public

As noted above, the draft proposes changes to the current Plan with respect to the IDL and 84 MSF that would constitute a break of faith and breach of trust with the public. There are other instances, as well, where the draft proposes changes or deletions which remove or change language that was central to ensuring a balance amongst the desires for development of Tysons, the protection of the way of life in surrounding communities, and the burden on Fairfax County taxpayers. This language was critical to the acceptance and endorsement of the current Plan Amendment by the public, the McLean Citizens Association, the Town of Vienna and others. See below for other specific instances in the draft 9/11/2015 Plan Amendment and recommendations:

Planning Horizon, p. 10: The sentence in the second paragraph that calls for regular monitoring of development should be restored: “Development, infrastructure, and public facilities should be monitored regularly...” From a public perspective, it is a given that these factors should be regularly monitored and that the obligation should continue to be articulated in a public document. This commitment was a key factor in the public’s acceptance of the Plan Amendment.

Major Elements of the Plan, p. 11; Under Transportation, the words “(as needed)” were added after “interim phases” to the bullet on Traffic impact analysis evaluating three time periods. They should be deleted. The analyses are essential, if the County modifies the IDL. With the qualifier in place, there are likely to be endless and needless arguments from the development community against such analyses. The Plan text must not invite disputes.

Major Elements of the Plan, p. 11: Under Urban Design, “generally” was added to modify the bullet that states “A variety of building heights with the tallest buildings generally in the ranges specified by the building height map.” The qualifier “generally” leaves the door wide open for very high building along the periphery of Tysons, adjacent to the surrounding neighborhoods. In so doing, the GTCC sees it as a step back and inconsistent with both the vision and commitment to the surrounding neighborhoods. Those who want and can justify an exception can still do so; “generally” places the burden on the citizens to justify why the developer should not be able to have what it wants.

Implementation, page 16: County staff/PCTC has deleted a major, important concept in deleting the last sentence in the third paragraph-- “The needs of the greater community, the public sector, and the private business sector will be balanced within Tysons in an open and transparent process to deliver the vision.” Without its inclusion, it is hard to see in this document any acknowledgement of the need to balance the interests and needs of the various sectors. The deletion is not simply an edit, but a big change in meaning. It should be retained.

Implementation, page 17: We have the same concern and make identical points regarding the deletion in the first paragraph with the sentence that reads: “Successful implementation will require commitment to the vision and Guiding Planning Principles; committed leadership; dedicated professional staff at the County and other agencies; loyal, hard-working citizen participants; and a private sector willing to work together to seize new opportunities and utilize new building techniques.” The replacement sentence that follows only speaks to county agencies working together. The GTCC requests inclusion of a sentence along the following lines: “Successful implementation will require commitment to the vision and Guiding Planning

Principles; committed leadership; dedicated professional staff at the County and other agencies; the involvement of citizen participants; and a private sector willing to work together and with County staff and the surrounding communities.”

Phasing to Public Facilities, page 40: Last paragraph. We are concerned with the dropping of the language here about having “detailed plans for the provision of public facilities, including parks and athletic fields” in place prior to or concurrent with the first rezoning approval... If we recall correctly, some developers lobbied the Park Authority successfully to remove detailed plans/locations on the maps for the various districts. We are worried about the fallout, especially, in conjunction with the language in the Parks section that would let the developers use the land in Tysons for buildings and move recreation facilities outside Tysons, a proposal that is inconsistent with the commitment to the surrounding communities to minimize the impacts on them. Plan language must be added to make it clear that each district needs to have developed plans and identified locations that will meet the requirements of those living and working in that district. It is especially premature to delete this language because there is still a significant consolidation and rezoning needed at Greensboro Station south of Rt. 7.

Major Concern – Miscalculation of School Needs

The GTCC believes the proposed amendments to the Plan affecting public schools is based on a miscalculation of the number of students attending Fairfax County Public Schools who will be living in the Tysons community. We have corrected Plan text below.

‘Typically, an elementary school is constructed with a design a capacity for 950 students. In 2010, the existing households in Tysons generated 400 elementary students. Between 2010 and 2030, projections call for 12,900 new households in Tysons. This number of new households could generate approximately ~~550~~**720** elementary students, resulting in a need for a new elementary school by 2030.

Between 2030 and 2050, projections call for another 20,700 new households in Tysons. This number of new households could generate an additional ~~890~~**1,160** elementary students, resulting in a need for a second elementary school by 2050.

Typically, a middle school has a design capacity for 1,350 students. Between 2010 and 2050, there are projected to be a total of 33,600 new households in Tysons. This number of new households could generate approximately ~~370~~**540** new middle school students. For purposes of long-range planning, capacity enhancements at one or more of the middle schools serving Tysons may be needed by the year 2050 to address the growing student population.

Typically, a high school has a capacity for 2,500 students. Based on the household projections noted above, ~~800~~**940** new high school students may be anticipated. For purposes of long-range planning, capacity enhancements at the existing high schools serving Tysons, will likely be needed by the year 2040.’

The number of projected new students cited in the above Plan Amendment text is based on outdated student yield ratios from the 2008 timeframe. The student yield ratios currently being cited by the FCPS Office of Facilities Planning Services, and used to calculate rezoning proffer contributions, are much higher. The above numbers in red are the projected number of students using the 2015 FCPS student yield ratios.

School Level	Mid/High-rise Multi-family 2008 Ratios	Projected 2050 Students (rounded)	Mid/High-rise Multi-family 2015 Ratios	Projected 2050 Students (rounded)	Undercounted by
Elementary	.043	1,440	.056	1,880	30%
Middle	.011	370	.016	540	45%
High	.024	800	.028	940	17%
Totals	.078	2,610	.1	3,360	28%

The Plan text should reflect the current FCPS student yield ratios.

Page 124, Table 8, Public Facility Needs, Fourth row

Table 8 calls for a new elementary School to be constructed at a threshold of 12,900 new households or by approximately 2030. However using current 2015 yield ratios, by 2030 Tysons would have 1,172 elementary students, not 950, and with dwelling units being added at a rate of 650/year (per GMU), a new elementary school would be needed by 2026, not 2030. We propose this target year by rounded down to 2025 in Table 8.

Additional Concerns with Specific Text in the Proposed Revised Plan

Page 12, Note at bottom of page:

Note: At the appropriate time, the county and community stakeholders should consider modifying the district names in light of the new metro station names and other factors.

The Comprehensive Plan should not recommend changing the districts names. Stakeholders will always find some reason to justify changing the district names, most of the time self-serving. These names are well established and have been recorded in the documents and legal records that already comprise many years of Tysons planning and zoning history. For the sake of continuity, we recommend they not be changed.

Page 16, third paragraph:

The first sentence of this paragraph mentions ‘urban services’. What are urban services and how do they differ from services found in non-urban areas?

Page 18, Circulator Alignments:

This section no longer discusses the alignment of the circulator and the heading should be changed. Since the circulator is unique to Tysons and serves only Tysons proper, perhaps ‘Tysons Circulator’ would be an appropriate heading.

Implementation Entity, page 19: The description of the role of the County on the Tysons Partnership needs to be modified, as follows: Fairfax County is an ex-officio member of the Partnership and its Board.” In all documents that we have seen, the County membership is designated as ex-officio.

Page 27, Maps in portrait orientation:

In this draft, all of the new maps have been changed from landscape to portrait orientation which reduces their size and readability. We much prefer the previous orientation which provides a larger, clearer view of the maps. When viewing a PDF file, pressing the Shift+Ctrl+Plus keys quickly rotates the page 90 degrees to view a horizontal map. When finished, Shift+Ctrl+Minus flips it back. It becomes second nature.

TOD District Intensity, page 35: The new language in the fifth paragraph is confusing: “Areas that achieve additional density with this provision should be treated as if they are located within 1/4 mile of a station when evaluating conformance with Plan objectives and Zoning Ordinance requirements, such as workforce housing and parking ratios.” This seems inconsistent with the letter of the Plan and spirit of the stakeholder compromises that enabled the Plan to be adopted in 2010 to the extent it would allow high density beyond ¼ mile of the rail stations. It should be eliminated.

Page 36, Circulator Intensity:

The last sentence reads, *‘However, should future ridership and analysis support a more robust circulator system, then the concept of circulator related intensity can be reconsidered’*.

The word ‘can’ should be changed to ‘could’, as ‘can’ implies that future ridership and analysis are the only criteria for reconsidering, and it further implies that reconsideration would be an entitlement granted upon demand. The word ‘could’ would be more appropriate given that any such analysis would be subject to interpretation and the Comprehensive Plan is silent on the specific criteria which would trigger reconsideration.

Page 38, First paragraph:

‘Athletic fields, parks and open space, stormwater management, and other public facilities will need to be operational in time to meet the demands generated by new development’.

In the last sentence, ‘schools’ should be added to the list and not lumped into the category of ‘other public facilities’. Schools are too important to not be specifically called out.

Page 38, Five-year Assessment:

Waiting 5 years after the completion of the Silver Line to Dulles for a County assessment is far too long. Current estimates put Phase 2 completion out to 2020, but based on Phase 1 late opening, who knows? But assuming it’s completed by 2020, we wait five more years and it’s now 2025 and, according to the Plan’s timeline, much of Table 7 would be underway or completed. And if that is the case, the county will have waited too long and it would be too late to make adjustments or rebalance. According to GMU estimates, Tysons should have experience significant growth before Phase 2 becomes operational.

But it is not as if the county is flying blind and has to launch a significant effort to assess Tysons’ progress. The assessment criteria listed at the bottom of page 38 should be an ongoing annual or

biannual effort that is based on the results of the Tysons Annual Report, upon which trends can clearly be discerned. If Tysons is experiencing growth or implementation problems, they need to be corrected forthwith.

Incorporating Transportation Improvements and Programs, page 39: The sixth paragraph speaks to relying on public and private sources of funding for transportation improvements. It states that “public funding comes from...” but is not nearly as definitive on private funding, where it states “the private sector's share is planned to include...” Shouldn't is “planned to” be dropped and “include” changed to “includes”? The parallelism is essential unless this is intended to leave the door open for a change on the private side.

Page 39, Paragraph 5:

‘Development approved in later years should be triggered by achievement of trip reduction...’

What is meant by later years? It replaces the words *later phases*, but we the public should have some idea what is meant by the early years and later years. Six years after Plan approval and after approving many millions of square feet, are we already in the later years? Please clarify.

Page 39, Paragraph 6:

‘The private sector’s share is planned to include on-site improvements, including the grid of streets, contributions to the Tysons-wide and Tysons Grid of Streets Transportation Funds, and taxes collected through the Tysons Transportation Service District.’

In addition to these contributions, please add *‘and other proffered contributions’* because there have been many ad-hoc contributions for road improvements such as the Rt. 123 Superstreet and the new Rt.7/State Street intersection.

Secondly, why does the text say ‘planned’? Do developers have the option of refusing these contributions and still receiving zoning approvals? Although we do not yet know how much revenue will be generated by these proffered contributions, we know with certainty that every PTC rezoning applicant can be counted on to agree to these proffers. The words *‘is planned to’* should be deleted and *include* changed to *includes*.

Page 42, Data Collection and Application Bullets:

Bullet # 10: *‘Utilization and capacity of public facilities, especially including public schools’*

Please append the following language to this bullet: *‘both inside and outside of Tysons, that enroll students living in Tysons.’* McLean and Vienna schools are going to get crushed. These schools, and their growing number of classroom trailers, will need to be monitored.

Bullet # 13: *‘Number and location of parking spaces’*

Please add, *‘and types of parking lots’* in order to track the reduction of surface and structured parking spaces and hopefully track the numbers of above and below grade parking as well.

Page 46, Second bullet:

Missing comma after ‘parks’.

Page 47, Second paragraph:

‘Many services, such as auto dealerships, service and repair shops, and storage facilities, even if their physical surroundings change.’

This sentence is incomplete.

Page 66, Official Map of Public Streets in Tysons:

This section is deleted, but how are the public and private sectors to keep up to date with the planned streets and proffered dedications if there is no map to consult? How are organizations such as MCA to track redevelopment and implementation progress in Tysons without the having a current map that allows them to see the big picture and understand the context of new redevelopments proposals in the later years?

There should be an official map, separate from, but referenced by the Comprehensive Plan that readers can access. The transportation changes coming to Tysons are significant and unprecedented in Fairfax County, and county citizens are basically left in the dark unless they want to download and crawl through megabytes of rezoning plans and voluminous proffer statements. Better yet, an up-to-date map should be available at www.fairfaxcounty.gov/Tysons.

Page 67, Bullet #2

‘Streets in TOD areas are expected to be attractive environments for walking, commerce, and casual interaction in addition to their function of moving traffic, including wide pedestrian facilities, dedicated bicycle facilities and lighting.’

The sentence should be reworked. We read it to mean people will shop and casually interact in these attractive streets, while dodging vehicles, instead of using the sidewalks.

Page 80, Table 4:

Bike parking ratio for Office use:

1 employee space per 7,500 sq. ft. and 1 visitor space per 20,000 sq. ft or to the satisfaction of the Director of Transportation. Minimum is 2 spaces.

This ratio would be correct if the old office employee ratio of 3.3 employees/1,000 sf were still a good rule of thumb, but it’s not, and the real number of employees/KSF continues to increase. The county is spending a great deal of money on on-street bike facilities. It makes no sense for the private sector not to accommodate the planned ridership. Assuming a projected ridership of 4%, the number of parking spaces should be doubled, or developers should proffer to increase bike spaces as needed to accommodate the 4% target.

Page 85, Parking Management:

Second sentence: *‘In 2015, Tysons had more land devoted to cars than to people with approximately an estimated 110,000 parking spaces. This amount of parking far exceeds what is necessary.’*

This sentence should be deleted. The first sentence in the paragraph makes the apropos point about the abundance of parking spaces in Tysons; however the number of existing parking spaces in 2015 is irrelevant. But worse, it misleads the reader into thinking there will be fewer parking spaces in the redeveloped Tysons and nothing could be farther from the truth. Do the math.

Page 88, Intelligent Transportation Systems:

This section make a persuasive argument for the importance, need and criticality of an ITS in Tysons. So much so, that the loss, malfunction or compromise of such a system could have enormous or even catastrophic consequences. We propose the following goal be added under the first paragraph: *‘All ITS infrastructure, applications, data and communications have protection from malware and cyber intrusion.’*

Page 106, Gymnasiums:

Third line down. GTCC members have been calling for gymnasiums in Tysons for wintertime adult recreation use for a long time. A gymnasium is a significant facility deserving its own paragraph in this section of the Plan to reinforce the need for these very high-value amenities. The Plan should exhort developers to find creative ways of incorporating gymnasiums in their buildings.

Parks and Recreation, page 111: Here is where in the last two paragraphs on this page, the door is opened to placing active recreation for Tysons at McLean and Vienna schools and parks. This is just what we don't want because it is contrary to the stated goals of reducing automobile use and protecting the surrounding communities. If significant numbers of Tysons residents and workers are required to drive for recreation, the Tysons Plan will have failed in a major way. Likewise, nearby parks and recreational facilities outside Tysons are already overused. Adding more users from Tysons will hurt places such as Vienna and McLean and would constitute another plan failure. While land prices may be high in Tysons, those costs should be passed along to Tysons residents and businesses, similar to how the City of New York passes along high prices for land in Manhattan to residents and businesses. Should we brainstorm on criteria that would need to be met/demonstrated before this could occur and also perhaps on requiring increased monetary proffers if the recreation areas are outside Tysons since it would mean that Tysons residents/workers are taking up space that otherwise would be used by McLean and Vienna residents and/or require buying very high-priced land in Vienna and McLean to accommodate Tysons?

Submitted by the Greater Tysons Citizen Coalition
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