

September 28, 2016

Catherine M. Hudgins
Hunter Mill District Supervisor
Fairfax County Board of Supervisors
12000 Bowman Towne Drive
Reston, VA 20190

Frank A. de la Fe
Vice Chairman
Fairfax County Planning Commission
12000 Government Center Parkway, Suite 330
Fairfax, VA 22035

Brian Winterhalter, Esq.
Colley LLP
11951 Freedom Drive
Reston, VA 20190

RE: *St. Johns Wood Applications – DPA/PCA/PRC 86-C-023*

Dear Supervisor Hudgins, Vice Chairman de la Fe, and Mr. Winterhalter:

The Reston Association (RA) Board of Directors does not routinely endorse or oppose specific zoning or other land use applications; however, the Board does recognize that it represents all real property owners and residents within the Reston Deed covenanted portion of the community – and that there is rarely only one opinion regarding these matters. Accordingly, the Board is careful not to drown-out, dilute or contradict the opinion of any RA member or cluster. Usually, the Applicant, the most-affected neighbors, the Reston Planning & Zoning Committee and County officials, work through issues to reach acceptable solutions.

Occasionally, an application raises one or more issues that are of great importance for all of Reston. In those instances, Reston Association is compelled to comment as one voice, in order to preserve the essential elements of Reston. The St. Johns Wood application is such an occasion.

The Reston-wide issue in this instance is whether an application must substantially conform to the specific recommendations of Fairfax County's adopted Comprehensive Plan. It is the policy and practice of RA Board that a land use application must conform, and be in harmony with all of the applicable, clear and unambiguous recommendations contained in the Reston Chapter of the Area III portion of the adopted Fairfax County Comprehensive Plan (*known as the "Reston Master Plan"*).

The current version of the St. Johns Wood application does not conform to the site-specific, detailed and unambiguous recommendations of the Reston Master Plan. Section 16-101.1 of the Fairfax County Zoning Ordinance requires PRC Development Plans to substantially conform to the adopted County Comprehensive Plan (the "Plan"). The current version of this DPA application does not, as outlined below.

1. The establishment of "Single Family Attached" ("SFA") housing on the St. Johns Wood site is contrary to the Comprehensive Plan's Reston Land Use Plan and its site-specific use options – which both recommend multi-

family housing. There is a clear difference in the Zoning Ordinance between these two types of housing. Multi-family is the only type of housing recommended in the Plan for this site.

2. The Plan is clear that the “medium-density multi-family residential use option” is allowed only if seven “conditions” or standards are met (see pgs. 54-55 of the Plan). This application relies upon the medium density option, but all of the conditions are not met. Likewise, the Comprehensive Plan establishes four criteria for applications which seek to redevelop existing multi-family housing (see pg. 57). These four criteria have also not been met.

Finally, unless and until this application conforms to the specific and unambiguous recommendations of the Reston Master Plan, it cannot be supported by Reston Association. Unless and until the Applicant also resolves legitimate concerns of those who live near the property (see attached summation of such concerns), the application will not be supported by the Reston Association.

Again, thank you for your time, efforts and consideration. Please do not hesitate to contact me if you have any questions.

Sincerely,



Ellen Graves, President
Reston Association

cc: Reston Association Board of Directors
Jared Wilcox, Chair, Reston Planning & Zoning
Goldie Harrison, Legislative Aide to Fairfax County Hunter Mill District Supervisor Catherine M. Hudgins
John McBride, Esquire, Odin Feldman Pittleman, Reston Association Land Use Counsel
Larry Butler, Reston Association, Senior Director of Parks, Recreation & Community Resources
William Mayland, Senior Staff Coordinator – Zoning Evaluation Division, Fairfax Co. Dept. of Planning & Zoning
Mary Ann Tsai, Staff Coordinator – Zoning Evaluation Division, Fairfax Co. Dept. of Planning & Zoning

Received September 14, 2016

Summation of Reston Association Member Zoning Related Comments Regarding Current St Johns Wood Application

Environmental Impacts including but not limited to such impacts on RA Common Area and Natural Areas

Tree preservation

The Bozzuto revised plan accommodates more tree preservation than previous plans, which is to be applauded. However, the design does not specify how much mature tree growth will be removed.

Transportation Impacts and Parking/Overflow

Traffic exits

Traffic entrance/exit design needs to be revisited and or changed. A new exit onto Center Harbor, across from Church Hill Place, will create traffic gridlock in both directions on Center Harbor Road. In addition, the current exit on North Point Village Road is not designed to absorb more traffic without significant disruption to the surrounding walkways in the neighborhood. The volume of trucks hauling excavation and new construction materials in and out of the site daily will substantially impact road viability and quality of life if kept on all adjacent roads. Our recommendation is that the entrance/exit of this new cluster access to Reston Parkway across from Great Owl Drive.

The new entrance/exit needs to be available for use in advance of all deconstruction and construction traffic activities so as to limit construction traffic on all minor roads (Center Harbor, North Village etc.)

The new entrance from Center Harbor Rd will cause lengthy vehicle backups. The cueing length between the proposed new entrance from Center Harbor and its intersection with Reston Parkway is too short to accommodate the density of development proposed, causing a degradation of this important intersection's level of service.

Standard ITE average trip generation assumptions understate vehicle trips experienced in Reston, where household sizes and/or income levels are higher than national averages.

Management of overflow street parking outside the 'cluster' boundaries

Capacity planning for resident car use and parking needs to be reevaluated. Capacity planning for designated parking for this new development should include a design to include all residential and guest parking within the new community cluster boundaries. Inside cluster designated parking should include: a) A minimum of 2 cars per household; b) parking arrangements for 'working vehicles and trucks' owned or driven by residents and which tend to spill out on the neighboring streets; c) guest parking.

Plan should clarify how overflow parking will be managed. Today, Bozzuto does not appear to effectively manage the 'permanent nature' of overflow or street-side parking along Center Harbor Road by its residents in the nearby Harbor Park cluster. (See example picture from August 2, 2016 along Center Harbor Road outside Bozzuto's Harbor Point apartment complex. 27 cars were recently identified utilizing street-side parking on Center Harbor Road, outside the Harbor Park cluster and closely adjacent to Buzz

Aldrin elementary school. Parking lots provided by Bozzuto at Harbor Park are either out of capacity or deemed to be less convenient by its residents than the Center Harbor street side parking. It appears the Bozzuto management cannot control overflow parking onto Center Harbor Road which impacts the sight and safety of the approach onto Buzz Aldrin Elementary. Bozzuto should clarify how they would be able to control this differently in the new St Johns Wood.

Safety: Traffic and Community

As a community we cannot stress enough the level of concern we ALREADY have with the traffic coming and going out of SJW and the surrounding areas. All too often our homeowners have had near misses, slammed on the breaks, and had to drive up on the side of the North Village all to avoid the numerous residents either entering or exiting from SJW. Behaviors observed are not stopping at stop sign, not yielding to pedestrians/bicyclist trying to cross street, drivers going down wrong side of the median and driving against traffic, rates of speed not yielding the right away to oncoming traffic. Now more than double the amount of cars entering and exiting an already challenging intersection of North Village and the entrance of SJW can only create a more treacherous situation.

Then there is Center Harbor traffic and the problems currently of motorists not yielding to pedestrians in crosswalks- often cars will go around a car yielding to pedestrians in the crosswalk and almost hitting them. And the crosswalk signs are not easily visible. The proposed entrance to SJW on Center Harbor will cause additional congestion and challenges. The real access for this project should be on Reston Parkway to mitigate the traffic impact. VDOT needs to be reproached to hear the communities concerns. We have seen the traffic studies and don't support the validity of their findings. Currently living in the community as homeowners we experience much different patterns of traffic than reported. And traffic studies do not accurately take into account the increased vehicle ownership of renters with such a high number of increased dwellings.

Traffic Concerns

1. RESTON PARKWAY ACCESS- this needs to be explained further as to what was requested and if alternatives such as just a one way access in and one way access out without crossing Reston Parkway was requested as a solution for easing some of the traffic impact. More open conversations need to be accomplished here with the full genuine support of all parties involved.
2. RAISED WALKWAYS- this speaks to a very URBAN setting with roadways that are divided down the middle not in keeping with the park like setting of North Point Reston.
3. DESIGNATED BIKE LANE ALONG CENTER HARBOR - this is an excellent idea to have designated bike lanes on both sides and too post no parking signs along the stretch of CENTER HARBOR. Thus parking wouldn't become an issue of overflow parking from the SJW redevelopment which technically we have been told there are plenty of parking spots in the design already. This way CENTER HARBOR could remain open to bikes and give emergency vehicles and VDOT vehicles open access to the road as well as the regular vehicles without having the danger of car doors opening or people trying to access or park on this already busy road especially with a school zone on it. All this could result in a much improved safety for pedestrians, children walking/biking to school and normal vehicles. The sight lines would be far more visible if no parking was permitted.

Parking

Concerning the number of vehicles that each unit is permitted without having excess cars parked along Center Harbor which will only increase traffic congestion and safety of neighboring communities. Do the parking garages accommodate work vans of tenants? Center Harbor currently is basically free from on street parking and should remain so as to help ensure safety for all and ease of access for emergency vehicles, etc.

Density and Intensity of Redevelopment Proposal

Density

"St. Johns Wood apartment property is planned and developed with Low-density Multi-family residential use. As an option, St. Johns Wood may be "redeveloped with medium density MULTI-FAMILY residential use under the following conditions:"

SINGLE FAMILY Attached units are not an option for redevelopment. Multi-Family units are the only allowed structure for either LOW Density or MEDIUM Density redevelopment, as stated in the Master Plan. It re-affirms keeping St. Johns Wood exactly in its original structure, which is only multi-family units. The language in the Master Plan is specific when the intent indicated is written not to allow change. There are numerous statements throughout the Master Plan with "SHOULD", as related to alternatives allowed. There are no alternatives allowed in this redevelopment.

Density

The magnitude of the apartment buildings both in structure size and population is absolutely overwhelming and not in keeping with the aesthetics as the MASTER PLAN indicates. The buildings are clearly URBAN in appearance, especially in height and overall continuous length. Their proposed proximity to the surrounding neighborhoods and Reston Parkway will have numerous levels of impact- height 5 stories high the only other Bozzuto apartment complex right down the street is already too high at 4 stories.

It is said that this particular SJW area is approved for a larger project but that is not really the case as the RA Master calls for it to remain low density. And even if it is supposedly approved doesn't mean it is the right approach to do. Reston really is not about overdevelopment! What makes Reston so attractive to potential homebuyers is that Reston is very natural and the sheer size of this project which will end up setting the precedent to future projects will severely compromise what Reston has so long stood for and has preserved up 'til now.

Persons per Acre

In reviewing what was presented by the developer to the DRB (Design Review Board) July 19, 2016, page 7 indicates for redevelopment "no persons/ acre factor." I see no exclusion of this factor, which the developer indicates. As previously mentioned, it is outlined in the Land Use Map, figure 3, and also as a footnote on page 18. As such, I would expect the omission of this factor to making the submitted plan invalid.

Character of Property (Mass and Architecture) does not adhere to revised Reston Master Plan for St John's Wood

The newly adopted Reston Master Plan states the following specifically for St John's Wood: 'The architecture and massing of development should feature context sensitive design that fits into the natural and architectural character of the surrounding area.'

Reference: <http://www.fairfaxcounty.gov/dpz/comprehensiveplan/adoptedtext/2013-22.pdf>

Reference: FAIRFAX COUNTY COMPREHENSIVE PLAN, 2013 Edition AREA III Reston, Amended through 6-2-2015 Area III, RESTON NEIGHBORHOODS, Section 5.

The newly approved design is not in alignment with the requirements for St John's Wood in the recently revised Reston Master Plan as the property mass and architecture style does not blend in with the natural character of the surrounding areas.

The massing of development structure is not context sensitive to the design of the surrounding area clusters. ... The property mass does not blend in with the natural character of the surrounding areas.

Building Structures

Visual impact of tall URBAN style architecture of 5 story heights and continuous length of buildings not in keeping with aesthetics/look and feel of garden and park surrounding neighborhoods as it should be per the master plan description.

Harmony with Existing Surrounding Neighborhoods

By including Single Family Units is a direct violation of the Master Plan, and as such, should make the submitted plan invalid. I do not consider the above conditions have been met. To repeat, I do not see how the existing structures of 9 buildings going down to 2 Multi-family buildings is in any way consistent of preserving the original residential community, which the Master Plan states repeatedly needs to be protected and must be in harmony with the surrounding residential neighborhoods. The submitted plan is more in line with the Town Center development, not a part of Reston Association.

Impacts to County Schools

School Impact

Despite what the County of Fairfax says are the ratios of expected that will be enrolled in the schools it is well known that Buzz Aldrin is a HIGHLY desirable school which families move to North Point so their children can have the opportunity to attend this school. Thus a project of this size will only open the flood gates to an already overpopulated school becoming untenable and soon trailers will appear out of necessity to correct this miscalculation on the part of Fairfax County as clearly seen at other area schools. Aldrin will not be the only school to suffer as it will continue to the middle and high schools.

And how is it that Fairfax Schools are not asking for a monetary contribution for the impact that this project is going to cause the schools? Again understood that studies have been made but the reality is this project is way too large and being severely underestimated as to the impact it will have on the community.

Other

Relocation

Appearance of lack of concerns for families and children living in St John's Wood

Please outline how you have evaluated this dramatic impact on the St John's Wood families. Do you have a plan or do you fully rely on the developer for this?

How can this be defended when so many families are impacted and there are other more suitable places to redevelop?

ADA Accessibility

I believe the existing plan, in which there has been no mention of an elevator, is not appropriate for persons with disabilities and some senior citizens. The American Disabilities Act must be implemented with care. This would include width of walkways and trails, ramps, adjustments to open public areas, as well as structural changes.

Based on the American Disabilities Act and the Fair Housing Act, those structures built after March 13, 1991, must meet the following conditions:

1. Public and common areas must be accessible to persons with disabilities.
2. Doorways and hallways must be wide enough for wheelchairs
3. All units must have:
 - An accessible route into and through the unit
 - Accessible light switches, electrical outlets, thermostats and all other environmental controls
 - Reinforced bathroom walls to allow later installation of grab bars
 - Kitchens and bathrooms that can be used by people in wheelchairs

These conditions apply to 4 or more units, with or without an elevator. Having no mention of an elevator, these conditions must apply to ground floor units.

I do not consider the above conditions have been met. Again, there are serious violations that would make the proposed plan invalid.

Noise Impact

The proposed DOG PARK included ONLY for residents of the property positioned at the back of the community closest to other neighboring communities. The barking sounds of the dogs and potential lights of this DOG PARK will bounce/reverberate right off the incredibly high 5 story building and echo into the surrounding communities (as is the current ongoing complaint at the current WEIHLE AVE dog park by residents in proximity to it.)

Lighting

How is lighting going to be handled for this property? The overwhelming size of the structures are going to have to be light pe county codes both on the interior and exterior. And the building structures are going to be as high as 5 stories high, well above the tree canopy. Thus leaving the exterior lighting of the enormous structures to shine DIRECTLY into the neighboring communities.