



The Falls Church Village Preservation and Improvement Society

July 20, 2020

Chair Andy Rankin and Members of the Planning Commission
Planning Department Staff
City Council Liaison David Snyder
City of Falls Church
300 Park Avenue
Falls Church, VA 22046

SUBJECT: Comments on Small Area Plan for Areas 4, 7 and 8 (dated March 13, 2020)

Dear Mr. Rankin and Members of the Planning Commission and Staff,

This letter and its attachment provide the views of the Falls Church Village Preservation and Improvement Society (VPIS) Board of Directors after review of the draft Small Area Plan (SAP) for Areas 4, 7 and 8 (version dated March 13, 2020). First, we recognize the significant effort by staff to develop this significant document.

Our concerns are:

- Some items, such as rapid bus lanes and wayfinding, are included in the SAP but are actually City-wide issues not unique here nor appropriate for this SAP. We do not concur on the rapid bus lanes currently and without knowledge of the overall plan.
- The step-down zoning is key to Area 4 and 7 adjacent to single family neighborhoods. We support Transitional Zoning to make this concept real, and not just a suggestion for a future negotiation point with developers. Founders Row outcome on Park provides clear reasons for our concerns.
- We are genuinely concerned with the planning and zoning concepts on page 3-12. We feel the special process for Area 8 was unique for education and was promised to be a one-time use for that special site. We do not concur that it is appropriate for Areas 4 and 7 which border single family residences. Further the opportunity rezoning appears to be an open checkbook to anything.

Our complete comments are in the attachment. We thank you for your consideration.

Sincerely,

Lisa Varouxis, President
On Behalf of the Board of Directors

Attachment

Village Preservation and Improvement Society**Village Preservation and Improvement Society's Comments on the changes proposed for the Comprehensive Plan for Planning Opportunity Areas 4, 7 and 8.**

1. This plan indicates it addresses planning areas 4, 7 and 8. On pages 2-7 it shows a developed commercial area on the southwest side on Broad Street (Area 4), and the connections to the W&OD Trail. But it does not significantly address the planning Area 4, (Gordon Road Area). Aside from the realignment of Gordon Road, and addition of streets it does not offer a future plan for the area except to leave it as light industrial and seek data centers.
2. We see pictures in the SAP of trees and green, and yet our mixed use developments are not yielding green space or canopy coverage. Our canopy coverage is rapidly declining at a time that we need it even more. We request that the redeveloped area include 20% green space and 20% canopy coverage on all commercial properties and mixed-use development. Without clear requirements for tree cover and green space, that becomes an afterthought to be negotiated. Increased setbacks can provide green space and places to meet the canopy coverage goals.
3. We see concepts and images from other jurisdictions in the plan that are confusing as they are not being recommended for this Small Area Plan (e.g. page 2-3 Indianapolis dual lane streetscape along roads to segregate modalities.) Page 2-5 and 5-1 shows pedestrian streets with store fronts, which would be a great addition to the City – but there is no requirement for that in this plan.
4. On page 2-7 an image of a landscaped street shows no trees in the streetscape in front of the building. We believe the SAP should reflect the Streetscape Plan the City Council approved and not visually offer an alternative that currently would not be compliant with City requirements.
5. Page 2-6 provides an image of vision for bus rapid transit lanes in Detroit, MI. We believe that is not appropriate for a SAP, given that it is a much larger issue than this site and needs to be addressed holistically for the City. We fully support the boulevard design of this section of West Broad Street – as shown on page 5-9 and mentioned in the Federal Realty letter and believe it should be explicitly included in this portion of Broad Street.
6. On page 3-12, the strategy is to keep Area 4 zoned M (light industrial) but allow for B2 uses. This will further erode zoning and land use management in Falls Church and we do not concur.
7. On page 3-12 there is a statement suggesting extending the Special Exception used for POA 8 (the 10 acres West End Commercial) to POA 4 and 7. That was a special circumstance related to education for that one time use. We strongly disagree with this strategy in Areas 4 and 7 and that the resulting density and height being allowed in these areas near single family residential neighborhoods is not appropriate. The exact reason for the wording on that exception was to clearly limit it to that specific site to fund the school replacement. The reference to opportunity rezoning during development appears to be an open invitation to anything- and may undermine the purpose of zoning.
8. The idea on page 3-12 and 4-12 for the Gordon Road area to be a data center is not desirable for Falls Church. One only needs to take a drive around Ashburn, Va to see the bland block, fenced fortresses with huge electrical substation requirements to see the undesirability of these as neighbors. The

discussion on page 4-12 implies that businesses want to locate near their data centers. Is there a study that shows that? More on focus, is there a significant financial benefit to the City to recruit data centers? If so, let's state that so we clearly understand the benefit. With the potential of the land consolidation it appears odd to leave all of this area as light industrial.

9. Zoning maps on pages 3-4 and 3-7 include the Falls Plaza Condos behind the Giant store as “High Density Residential” and appear to put that land in play. We believe most would consider those Medium Density Residential and not equated to the Byron, The West Broad or the Broadway. With the emphasis of the black parcel on the maps – it is unclear of the intended future use.
10. We support the concept introduced on page 3-6 of the “step-down zone.” That is the intent of zoning T1 and T2 transitional zoning to ensure that high height development does not occur next to single family residential. On the Land Use and Zoning map on page 3-14, the step-down area is suggested to be B1 and the rest as B3 zoning. We need to legally zone it to a low maximum height so that it is very clear. Unfortunately, the zoning on Park Avenue was changed so that those protections were removed and the result is a very high building emerging immediately across the street from single-family residences. On page 5-5 the issue is visually shown with the phrase building / street ratios. The concept also applies similarly to “compatibility of height” of different uses such as the adjacent neighborhood. We recommend the “Angle of Horizon” term and methodology as a clear way of indicating the expectations to developers and for the surety of sunlight for nearby neighbors (albeit shorter sunlit days, later springs and earlier falls). The map shown for Falls Plaza only allocates the rear driveway width as the step down zone, which is a very limited area. It should be a wider area, but a state angle of visible horizon would be universal and eliminate the need for the width determination of the stepdown zone. We notice no ordinance to actually implement the concept. We strongly prefer T1 and T2 zoning next to residences to ensure clarity of expectations.
11. Page 5-4 shows the plan to add a new street half-way between Birch Street and Haycock Road. That would be a very short block and challenging for Broad Street traffic if it were to be a full crossing intersection as shown. If the median of trees is left on Broad Street, so it is only right turns for the new street, then it would work better.
12. Page 5-7, shows three diagrams with increasing density and heights. The far-right building massing gets taller. The diagram does not incorporate the idea shown on page 3-6 of a step-down zoning against the neighborhood next to that tall mass.
13. Page 5-9 appears to support a bikeway and pedestrian sidewalk separated with a landscaping strip. We fully support this concept. In other places some confusing concepts are offered that are different and appear not to support this plan.
14. Page 5-16 suggests a unique wayfinding for this SAP. For an area the size of the City, shouldn't our wayfinding be the same throughout the commercial areas of the City? We don't feel this is appropriate for this one SAP. If implemented, – this would provide a visually fragmented wayfinding in different parts of the City.
15. In part 6, the various multi-modal transportation concepts surfaced in this SAP are dizzying and confusing. and not compatible with page 5-9. We do not support bus rapid transit lanes here in a SAP.

16. On page 6-5 mentions adequate lighting but does not mention “Dark Skies” compliant, which we support and advocate to become part of City policy throughout the commercial corridors. It is of specific issue here in area 4 and 7 because of the current conditions of significant light bleed in residential neighborhoods from intense high lamp poles and unshielded light at the car dealers.
17. On Page 6-11, the plan strategy is to allow dockless bike parking throughout West End. Why would this planning area be different? We thought that the City did not approve dockless rental of personal transit rentals (bikes and scooters) when this was considered last year. Is this in line with the City Council direction?
18. On pages 7-4 there is a discussion on pervious pavers. Are we making those a requirement? Are they unique to this planning area? Likewise, on page 7-7, there is a discussion about urban agriculture and community gardens. Are we making those a requirement for this planning area?
19. Appendix A pages are unnumbered and therefore difficult to reference.
20. In Appendix A, The Wayside Property, perhaps it should be added that Colonel Broadwater was active in the Fairfax Resolves and the First Virginia Convention with George Washington). His estate also included all of the planning Area 8 land also.
21. In Appendix A, Figure 3, the photo caption is incorrect here (and in the source book). The scene is looking southeast, not west. The train station shown was near the current Grove Avenue, and it is clear from the topography the elevations decline as you move from Shreve Road down into the City.