

September 13, 2012

Neighborhood Coalition to Save Tysons Last Forest
Fairfax Plan Requires Protection of Old Courthouse Spring Branch Stream Valley
FCDOT Highway Ramp Proposal Contradicts Plan Requirements

Since 1973 and as recently as June 2012, again and again, the Board of Supervisors has promulgated clear guidelines to protect, enhance, and expand stream valleys throughout the County, including explicit instructions to restore the Old Courthouse Spring Branch Spring Valley Park (what our Coalition refers to as “Tysons Last Forest”) and to prohibit nearby or thru “hardscape areas” such as highway ramps. Accordingly, our “Neighborhood Coalition to Save Tysons Last Forest,” representing about 1500 households in and around Tysons Corners’ “West District,” opposes the Fairfax Department of Transportation (FCDOT) proposal to build a highway ramp or road through the Old Courthouse Spring Branch Spring Valley EQC/RPA parkland as it is wholly inconsistent with County leaders’ vision and guidelines, as codified in the Fairfax County Comprehensive Plan.

Moreover, the FCDOT proposal to severely degrade the Stream Valley has provoked significant community opposition. As evidenced by the recent Washington Post Article, “Tysons Corner’s last green space: Will it be paved to make way for Tysons City?” (Tom Jackmon, June 4, 2012), over 300 Vienna and Tysons residents “packed” a cafeteria on a Thursday night. Upon hearing of the plan, the reporter observed, “To say there was an uproar in that cafeteria would be an understatement.” See also www.SaveTysonsLastForest.org. The lack of community support is also contrary to the overall goals of the Fairfax County Comprehensive Plan to ensure that growth “should take place in accordance with criteria and standards designed to preserve, enhance, and protect an orderly and aesthetic mix of residential, commercial/industrial facilities, and open space without compromising existing residential development.” See Fairfax County Comprehensive Plan, 2011 Edition, Policy Plan, Land Use, p. 2. Thus, while understanding the great challenges posed by the transformation Tysons Corner is undergoing, the paving over of a portion of the Stream Valley achieves few (if any) of the goals of the Fairfax County Comprehensive Plan, while violating multiple.

A detailed review of the Fairfax County Comprehensive Plan indicates that language throughout the Plan supports this opposition. As the Comprehensive Plan delineates the broad Policy Plan guidance from the detailed Area Plan language, likewise summaries and excerpts of relevant Comprehensive Plan language are separated into two sections as well:

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INTRODUCTION

THE “FAIRFAX COUNTY COMPREHENSIVE PLAN” GUIDES ALL COUNTY PLANNING, SO COUNTY LEADERS SHOULD FOLLOW THEIR OWN GUIDANCE

Since 1973, through its “Fairfax County Comprehensive Plan,” Fairfax County has provided and updated a basic plan through which it sets forth guidelines for how Fairfax County is to grow and develop. Amended and approved only after extensive staff review and public discussion, the Comprehensive Plan is the critical tool that the elected Board of Supervisors uses to communicate to County staff and to the public its plans, its instructions, and, most importantly, its promises. It is the compact between the County’s leadership and its community. Commercial and residential developers must satisfy these requirements before building. Homeowners rely on these rules when we purchase or renovate homes. The future of Fairfax County depends on these rules to be consistent, fair, and unwavering. County leadership and staff must also follow its own guidelines.

The Fairfax County Comprehensive Plan (the “Plan”) is separated into two sections, the **Policy Plan Element**, and the **Area Plans I-IV**.

Policy Plan Element: This volume contains Board of Supervisors goals, policies and objectives regarding land use, transportation, housing, the environment, human services, public facilities, parks and recreation, revitalization, economic development and heritage resources. The Board of Supervisors “Goals” and the “Environment” sections of the Policy Plan contain very compelling language to protect Fairfax County’s natural resources and stream valleys. **See FAIRFAX COUNTY COMPREHENSIVE PLAN, 2011 Edition, Environment, Amended through 7-27-2010.** <http://www.fairfaxcounty.gov/dpz/comprehensiveplan/policyplan/>

There are three principles that will be repeated throughout this Position Paper, mostly because they are so important that they are virtually ubiquitous throughout the Comprehensive Plan as well.

1. With rapidly disappearing natural resources, the County has made it a priority to protect and preserve the remaining ones. Most residents do not understand the critical relationship between the protection of a stream valley with air quality, water quality, watershed protection, stormwater management, and flood prevention, but the Board of Supervisors, through its Comprehensive Plan language, recognizes and values it.
2. The Board of Supervisors also recognized that, to maintain those natural resources effectively, it must connect the preservation of the wooded areas near the stream valleys, the vegetated riparian buffer areas, and the streams themselves. Because of the interconnections between these different kinds of natural resources, the County protected entire areas through the County’s “Environmental Quality Corridor” (EQC) and “Resource Protection Area” (RPA) programs.
3. These natural resources are not only critical to the air and water quality of our County, but they also play a valuable role in upholding our quality of life. “Visual and physical separation,” “buffers,” “passive recreational uses,” the aesthetic nature of trees and streams, the enjoyment of a walk in the woods ... the Board of Supervisors also envisioned how our County residents would want to enjoy Fairfax County today and for generations to come. This principle applies to Tysons Corner residents as well as the current residents of the surrounding neighborhoods; both will enjoy the Old Courthouse Spring Branch.

The fact that the Old Courthouse Spring Branch Stream Valley is then specifically named for said protection and preservation in the Comprehensive Plan is not a coincidence. The “Old Courthouse Spring Branch Stream Valley,” already categorized as an “Environmental Quality Corridor” (EQC) and a Resource Protection Area (RPA) -- with its running stream, role in the Difficult Run Watershed, nationally recognized wetlands, floodplain, 33 forested acres of mature trees, and dense vegetation -- falls squarely within the principles mentioned above. Not only did the Supervisors require it to be protected and preserved; they did so because it made perfect sense to do so.

Area Plans I-IV: This volume contains guidance regarding four geographical areas. “Area II” is the area that contains the Fairfax Planning District, McLean Planning District, Tysons Corner Urban Center, and the Vienna Planning District. In 2010, when it envisioned the growth of Tysons Corner Urban Center, County leaders set forth specific principles and made specific promises to our community – codifying them all in the Tysons Corner Amendment to the Comprehensive Plan. As aforementioned, in the “Area Plans” section, the Plan contains unambiguous language about protecting the Old Courthouse Spring Branch Stream Valley, *in particular*, in both the geographic areas of the “Vienna Planning District” and the “Tysons Corner Urban Center” (which overlap in the area at issue). <http://www.fairfaxcounty.gov/dpz/comprehensiveplan/>.

Tysons Corner Amendments: In June 2010, after more than a decade of Task Force efforts, multiple staff revisions, and extensive public comment, the Board of Supervisors approved a Tysons Corner amendment to the Comprehensive Plan, which contains 187 pages of very detailed instructions for how the County will develop the Tysons Corner Urban Center (hereinafter called the “Tysons Corner Plan”). As will be noted in the following section, beginning on page ____, the Tysons Corner Plan specifies that Old Courthouse Spring Branch Stream Valley, in particular, must be protected and preserved. No less than eight times, the Comprehensive Plan explicitly requires the preservation of Old Courthouse Spring Branch Stream Valley *by name* or referring to it as an “existing stream valley park” (of which there are only two in Tysons Corner: Old Courthouse Spring Branch and Scotts Run). Likewise, the Plan explicitly prohibits a highway ramp or road through the Spring Valley. “Stream valley park expansions [areas around the RPA] should not include large hardscape areas (other than trails) and resources management should drive park design.” See <http://www.fairfaxcounty.gov/dpz/comprehensiveplan/adoptedtext/2007-23.pdf>

Vienna Planning District: Then, in June 2012, the Board of Supervisors updated and approved the Vienna Planning District section of the Plan. This section also provides incredibly detailed instructions for how to develop the V-3 Spring Lake Planning Sector, which includes protection of the Old Courthouse Spring Branch Stream Valley, again named explicitly. See <http://www.fairfaxcounty.gov/dpz/comprehensiveplan/area2/vienna.pdf>

I. “Policy Plan Element” Supports Protection of Stream Valleys

A. BOARD OF SUPERVISORS MADE ENVIRONMENTAL PROTECTION AN OVERARCHING GOAL

According to the Plan, the County lost 30% of its “Open Space” land from 1975 to 1995. “Large tracts of natural land are especially scarce in the more urban inner part of the County.” (Policy Plan, p. 14). This situation led the Board of Supervisors to refocus its efforts on protecting the County’s open space, especially the more “ecologically sensitive” areas.

“The current scarcity of certain environmental amenities focuses current and future environmental planning efforts on the conservation of remaining resources and the rehabilitation of degraded environments,” require the Board of Supervisors as indicated in the Policy Plan of the Comprehensive Plan.

<http://www.fairfaxcounty.gov/dpz/comprehensiveplan/policyplan/environment.pdf>

BOARD OF SUPERVISORS GOALS

Fairfax County has adopted two goals, “Environmental Protection” and “Open Space” that relate to conservation of the natural environment. These Goals read as follows:

Environmental Protection - *The amount and distribution of population density and land uses in Fairfax County should be consistent with environmental constraints inherent in the need to preserve natural resources and to meet or exceed federal, state and local standards for water quality, ambient air quality and other environmental standards. Development in Fairfax County should be sensitive to the natural setting, in order to prevent degradation of the County’s natural environment.*

Open Space - *Fairfax County should support the conservation of appropriate land areas in a natural state to preserve, protect and enhance stream valleys, meadows, woodlands, wetlands, farmland, and plant and animal life. Small areas of open space should also be preserved in already congested and developed areas for passive neighborhood uses, visual relief, scenic value, and screening and buffering purposes.*

In addition, three other goals, “Quality of Life,” “Land Use” and “Transportation,” cite the need to protect the environment.

“The Fairfax County Goals reflect the belief of the community that environmental protection and preservation are overarching components of the quality of life. The Goals demonstrate an understanding of the interdependence of decisions regarding private development, transportation, and public works with the environment. Decisions made about the scale, location, and type of human activity on the landscape affect, and are affected by the natural environment.”

FAIRFAX COUNTY COMPREHENSIVE PLAN, 2011 Edition POLICY PLAN Environment, Amended through 7-27-2010, Page 1.

These are eloquent, compelling statements in light of the growing developments and population increases of Fairfax County. The Board of Supervisors must stand by these strong statements, even when trying to solve complicated transportation problems that Tysons Corner provides.

B. COUNTYWIDE OBJECTIVES AND POLICIES FOR “ENVIRONMENT” HAVE HIGH STANDARD

After the broad “Goals,” the Plan details the “Countywide Policies and Objectives” in a variety of subjects, including the “Environment,” with comprehensive guidance and numbered “Objectives” in each section. The Policy Plan includes a high standard for the County to reach when handling environmental issues:

*“Many of the environmental policies listed below will be implemented on a case by case basis as land is developed or redeveloped. These policies should be applied as appropriate to both private and public development. **Development proposals should not be approved unless and until issues generated by the application of these policies have been resolved.**”*

Policy Plan, page 2 (Environment, Amended though 7-27-2010 – *after* adoption of the “Tysons Corner Plan”)

The Policy Plan recognizes that the reasons for protection of natural resources are many: water quality, flood prevention, tree cover, air quality, the habitat of animals and plants, and residents’ enjoyment of their physical environment as a critical part of their quality of life. Accordingly, this section is separated into (1) Environmental Pollution (Air Quality, Water Quality, Light Pollution); (2) Environmental Hazards; and (3) Environmental Resources. We do not address Environmental Hazards herein.

1. Preventing Environmental Pollution

“The conversion of land to urban uses and our dependence on the automobile have resulted in unacceptable amounts of pollution.” The Plan notes that the region has not met the federal air quality standards and has been designated a “non-attainment area” for almost 10 years. (Policy Plan, Environment, page 4). The County understands the connection between land use and the quality of our air and water, as follows:

a. Improve Air Quality by Tree Preservation

First, the Plan requires that the County establish land use patterns and transportation facilities that help our air quality, including “support air quality improvement through tree preservation” (see Policy 1c). Destroying trees in a 33 acre forest to make a four-lane highway ramp would conflict with this objective twofold.

See **Objective 1: Preserve and improve air quality.**

b. Protecting Stream Valleys is Critical to Maintaining Water Quality

For water quality, stormwater management, habitat, flood prevention, and aesthetic opportunities, among other reasons, the County is very serious about “protecting and restoring the ecological quality of streams” countywide. The Policy Plan specifies how to handle the County’s “Environmental Quality Corridors” (EQC) and stream valleys:

*The core of Fairfax County’s Environmental Quality Corridor (EQC) system is its stream valleys. Streams provide habitat for aquatic species and are an integral component of stream valley habitat systems. Streams also serve to replenish water sources that may ultimately provide drinking water and are places of natural beauty, that provide recreational and aesthetic opportunities, contributing to the quality of life in Fairfax County. Much of the County’s parkland consists of stream valley parks, and much of the County’s existing and planned trail system is located near streams. Land use and development activities have the potential to degrade the ecological quality of streams through the direct transport of pathogens and pollutants, as well as through hydrologic changes that can alter the character of flow in streams, resulting in alterations to stream morphology (e.g., stream bank erosion). **The protection and restoration of the ecological quality of streams is important to the conservation of ecological***

resources in Fairfax County. Therefore, efforts to minimize adverse impacts of land use and development on the County's streams should be pursued.

FAIRFAX COUNTY COMPREHENSIVE PLAN, 2011 Edition POLICY PLAN Environment, Amended through 7-27-2010, Page 6.

The County is very conscious of the impact of water quality, stormwater management, and flood prevention on its residents. As a result, there are three "Objectives" that require the protection of the ecological integrity of streams: Objective 2, Objective 3, and Objective 9. Noteworthy Comprehensive Plan language is indicated in bold because it so clearly demonstrates that the Board of Supervisors recognizes and values the critical connections between the wooded areas near the stream valleys, the vegetated riparian buffer areas, the streams themselves, and the areas protected through the County's "Environmental Quality Corridor" (EQC) and "Resource Protection Area" (RPA) programs. These interconnected natural resources must be protected and preserved, requires the Plan language.

See **Objective 2: Prevent and reduce pollution and groundwater resources. Protect and restore the ecological integrity of streams in Fairfax County.**

Policy 2 k –

- **"Minimize the amount of impervious surface created.**
- **Encourage the preservation of wooded areas and steep slopes adjacent to stream valley EQC areas.**
- **Encourage fulfillment of tree cover requirements through tree preservation instead of replanting where existing tree cover permits. Commit to tree preservation thresholds that exceed the minimum Zoning Ordinance requirements."**

Policy 2 l

In order to augment the EQC system, encourage protection of stream channels and associated vegetated riparian buffer areas along stream channels upstream of Resource Protection Areas (as designated pursuant to the Chesapeake Bay Preservation Ordinance) and Environmental Quality Corridors ... Where applicable, pursue commitments to restoration of degraded stream channels and riparian buffer areas.

The Plan describes the importance of protecting the Chesapeake Bay and other Virginia waters through the EQC and Resource Protection Area (RPAs) programs, as follows:

"Programs to improve water quality in the Potomac River/Estuary, and Chesapeake Bay will continue to have significant impacts on planning and development in Fairfax County. There is abundant evidence that water quality and the marine environment in the Bay are deteriorating, and that this deterioration is the result of land use activities throughout the watershed.

In order to protect the Chesapeake Bay and other waters of Virginia from degradation resulting from runoff pollution, the Commonwealth has enacted regulations requiring localities within Tidewater Virginia (including Fairfax County) to designate "Chesapeake Bay Preservation Areas", within which land uses are either restricted or water quality measures must be provided. Fairfax County has adopted a Chesapeake Bay Preservation Ordinance pursuant to these regulations.

The more restrictive type of Chesapeake Bay Preservation Area is known as the "Resource Protection Area" (RPA). With a few exceptions, ... new development is prohibited in these areas. In Fairfax County, RPAs include the following features:

- *Water bodies with perennial flow; . . .*
- *A buffer area not less than 100 feet in width around the above features; and*
- *As part of the buffer area, any land within a major floodplain."*

Policy Plan, p. 10.

Importantly, the Old Courthouse Spring Branch Stream Valley is categorized as an EQC and a Resource Protection Area (RPA), and the County takes these categorizations and their protections very seriously.

Objective 3: Protect the Potomac Estuary and the Chesapeake Bay from avoidable impacts of land use activities in Fairfax County.

Policy 3 a.

Ensure that new development and redevelopment complies with the County's Chesapeake Bay Preservation Ordinance...

Policy 3 b

Support the analysis and recommendations contained in the Chesapeake Bay Supplement to the Comprehensive Plan.

2. Protecting Environmental Resources

In a further section, the Policy Plan mentions “Environmental Resources” specifically and the language is even more explicit about protecting “ecologically significant” parkland. Again, noteworthy Plan language is in bold to demonstrate how the Board of Supervisors, repeatedly and meaningfully, confirmed the need to stop the disappearance of the County’s natural landscape to both protect the necessary ecological resources (for all the crucial air- and water-related reasons mentioned earlier) and also to maintain residents’ quality of life:

ENVIRONMENTAL RESOURCES

*The third category of environmental issues addresses the protection, preservation, and restoration of environmental resources. **These issues reflect a need to conserve or restore appropriate examples of the County's rapidly disappearing natural landscape, to protect and manage its ecological resources, and to provide visual relief in the form of natural vegetation between adjacent and sometimes incompatible land uses.***

It is desirable to conserve a portion of the County's land in a condition that is as close to a predevelopment state as is practical. A conserved network of different habitats can accommodate the needs of many scarce or sensitive plant and animal species. Natural open space also provides scenic variety within the County, and an attractive setting for and buffer between urban land uses. In addition, natural vegetation and stream valleys have some capacity to reduce air, water and noise pollution.

Policy Plan, pp. 13-14.

To implement this critical need to protect the County’s environmental resources, in 1975, the Board of Supervisors incorporated the Park Authority’s “Stream Valley Park Plan” into the Environmental Quality Corridor (EQC) system back, codifying the EQC policy in “Objective 9” of this Environment section of the Policy Plan volume. Over 35 years later, that protective language is still in Objective 9 in such detail that it takes up four pages of the Policy Plan.

See **Objective 9: Identify, protect and enhance an integrated network of ecologically valuable land and surface waters for present and future residents of Fairfax County.** In particular, **Policy 9a** sets forth the

requirements to **identify, protect and restore an Environmental Quality Corridor system (EQC)**. See Policy Plan, pages 14 – 18. <http://www.fairfaxcounty.gov/dpz/comprehensiveplan/policyplan/environment.pdf>

See also objectives to protect tree cover and open space/conservation easements:

Objective 10: Conserve and restore tree cover on developed and developing sites. Provide tree cover on sites where it is absent prior to development.

Objective 11: Promote the use of open space/conservations easements as tools to preserve environmental resources. Policy 11a identifies the use of **Environmental Quality Corridors, Resource Protection Areas, and other environmentally sensitive areas.**

See Policy Plan, p. 18. Again, the Board of Supervisors recognized the vital connections between ecologically valuable land, stream valleys, and tree cover.

C. COUNTYWIDE PRINCIPLES AND OBJECTIVES – “PARKS AND RECREATION” SECTION ALSO PROTECTS STREAM VALLEYS

Old Courthouse Spring Branch Park is categorized as a “resource-based park.” These parks are, by their nature, to be protected and preserved.

*The location for Resource-based Parks is determined by the location of the specific resources. Size and access can take many forms depending on the setting and type of resources. Access to stream valleys is primarily by trails; however trailheads with parking should be strategically located along trail routes. **Management plans should give consideration to the resource and allow public use only as it is compatible with resource protection.***

*Stream valleys are a predominant physiographic feature of Fairfax County and comprise the core of the County’s Environmental Quality Corridor (EQC) system. **Parks located in and along the stream valleys encompass those segments of EQCs planned for public parkland and comprise the core elements of a greenway network that links areas notable for significant natural and cultural resources with residential and employment areas throughout the County.** They may vary in size and character from steeply sloped corridors with cascading streams to broad floodplains; all are treated as sensitive environmental areas.*

See **FAIRFAX COUNTY COMPREHENSIVE PLAN, 2011 Edition POLICY PLAN Parks and Recreation - Appendix, Amended through 6-20-2005, Page 13**

<http://www.fairfaxcounty.gov/dpz/comprehensiveplan/policyplan/parksrec.pdf>

D. PARK AUTHORITY MANAGEMENT PLAN AND POLICY MANUAL IN ACCORDANCE WITH COUNTYWIDE POLICY PLAN

Following the direction of the Countywide Policy Plan, the Fairfax County Park Authority approved a Natural Resource Management Plan in 2009:

However, current policies and plans adopted by the Park Authority Board set a high standard for resource protection that requires an agency-wide commitment to natural resource preservation and management. These guiding documents consist of the 1995-2010 Park Comprehensive Plan, the 2002-2006 Fairfax County Park Authority Strategic Plan, and policies adopted by the Park Board.

Objectives 200 and 300 and their respective policies require the “protection and preservation of significant and sensitive natural resources in accordance with ... the Countywide Policy Plan.”

Finally, and very powerfully, the County acknowledges:

Policy 301 states that the Park Authority shall protect lands and facilities it owns as a public trust and shall resist any effort to encroach upon or destroy any park, historical site, natural area, or recreational facility.

See Fairfax County Park Authority Policy Manual (March 2008), Policy 301 - Protection of Lands and Facilities. P. 300.2. <http://www.fairfaxcounty.gov/parks/parkpolicy/FCPAPolicyManual.pdf>

It is clear that the County recognizes the need to protect and preserve its natural resources, especially lands that are ecologically sensitive and categorized as EQC or RPA. The Old Courthouse Spring Branch Stream Valley is the last large forested land in Tysons Corner (over 33 acres of trees, wetland, and stream valley). As most of the land was donated to the County over 30 years ago with the promise to maintain it “substantially in its natural condition” (see our Position Paper on the Original Deeds), the County now has a **public trust**, in its own words, to maintain it, restore it, and protect it from development. County leaders must “**resist any effort to encroach upon or destroy**” said “park” and “natural area”.

II. Tysons Corner & Vienna “Area Plans” Explicitly Protect Old Courthouse Spring Branch and Prohibit a Highway

Beyond the countywide goals, policies, and objectives of the Policy Plan are the specific guidelines of the “Area Plans,” including the newest guidance on how to develop Tysons Corner Urban Center (which overlaps geographically with the Vienna Planning District).

Tysons Corner Amendments: In June 2010, after more than a decade of Task Force efforts, multiple staff revisions, and extensive public comment, the Board of Supervisors approved a Tysons Corner amendment to the Comprehensive Plan, which contains 187 pages of detailed instructions for how the County will develop the Tysons Corner Urban Center (hereinafter called the “Tysons Corner Plan”). The Tysons Corner Plan specifies that Old Courthouse Spring Branch Stream Valley, in particular, must be protected and preserved. The Plan repeats itself, giving specific details about restoring streams, protecting watersheds, and specifically indicating, “[*Scotts Run and Old Courthouse Spring Branch*] stream valley parks should not only be protected from development and infrastructure impacts, but be restored and enhanced.” No less than eight times, the Comprehensive Plan explicitly requires the preservation of Old Courthouse Spring Branch Stream Valley *by name* or referring to it as an “existing stream valley park” (of which there are only two in Tysons Corner: Old Courthouse Spring Branch and Scotts Run). Likewise, the Plan explicitly prohibits a highway ramp or road through the Spring Valley. “Stream valley park expansions [areas around the RPA] should not include large hardscape areas (other than trails) and resources management should drive park design.” See FAIRFAX COUNTY COMPREHENSIVE PLAN, 2007 Edition AREA II, Tysons Corner Urban Center, Amended through 6-22-2010. <http://www.fairfaxcounty.gov/dpz/comprehensiveplan/adoptedtext/2007-23.pdf>

Vienna Planning District: Then, in June 2012, the Board of Supervisors updated and approved the Vienna Planning District section of the Plan. This section also provides incredibly detailed instructions for how to develop the V-3 Spring Lake Planning Sector, which includes protection of the Old Courthouse Spring Branch Stream Valley. See FAIRFAX COUNTY COMPREHENSIVE PLAN, 2011 Edition, Vienna Planning District, Amended through 6-12-2012. <http://www.fairfaxcounty.gov/dpz/comprehensiveplan/area2/vienna.pdf>

A highway or broad avenue through an existing park or last remaining open space separating existing communities from the planned Tysons Corner redevelopment would be inconsistent with these goals, which is why the surrounding communities strenuously believe that a proposed highway offramp and avenue running through the Environmental Quality Corridor (EQC) surrounding Old Courthouse Spring Branch is wholly inconsistent with the Fairfax Comprehensive Plan broadly, and as will be explained below, with those portions directly impacting the Tysons Corner transformation currently underway.

A. TYSONS CORNER URBAN CENTER AMENDMENTS SPECIFY THAT THE OLD COURTHOUSE SPRING BRANCH STREAM VALLEY, IN PARTICULAR, MUST BE PROTECTED AND PRESERVED. FURTHERMORE, THE PLAN PROHIBITS A HIGHWAY RAMP OR ROAD THROUGH IT.

There are three separate sections that all support the Neighborhood Coalition’s opposition to a highway ramp through the Old Courthouse Spring Branch Stream Valley:

1. Introductory language of the “Vision” and “Implementation” (pages 6-13)
2. Areawide Recommendations: Environmental Stewardship (pages 72-85)
3. District Recommendations - West Side District (pages 158-161)

As one reads deeper into the Tysons Plan, the language moves from broad protection of natural resources in Tysons Corner, to protection of stream valleys (only two exist), to explicit protection of the Old Courthouse Spring Branch Stream Valley EQC itself. It is noteworthy that, in reaffirming the protection of the Stream Valley, the Comprehensive Plan specifically refers to it as the Old Courthouse Spring Branch “EQC” (Environmental Quality Corridor), a term reserved for protected land. See

1. The Introduction Describes the Broad Mandate that the County Protect the Environment and Restore the Streams in Tysons Corner.

From the very beginning of the introductory section of the Tysons Corner part of the Comprehensive Plan (see <http://www.fairfaxcounty.gov/dpz/comprehensiveplan/adoptedtext/2007-23.pdf>), the County lays out its requirements to providing an environmentally sustainable Tysons. Reaffirming the consistent principles of the Policy Plan Element, four different sections emphasize that the environmental features in Tysons will be respected, enlarged, and restored. See Vision, Guiding Planning, Framework, and Implementation sections, as noted below:

- The “Vision of Tysons” requires a “*sustainable Tysons with restored streams*” (p. 6).
- The “Guiding Planning” section demands that the County “*respect the unique natural features ... of Tysons in all plans, expand useable and publicly accessibly open space and improve the existing natural environment.*” (p. 6)
- The “Framework” prioritizes “*Placing a strong focus on the environment. The plan to transform Tysons recognizes the long-term value and importance of protecting and enhancing the environment; this can be achieved through such goals as ... restoring streams, ... and promoting the efficient use and conservation of resources.*” (p. 7).
- “Implementation” mandates that “*Parks and open space will be enlarged and restored.*” (p. 13).

It is noteworthy to include the following language under the “Implementation” section on page 13 of the Tysons Corner Plan:

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.

*Transforming Tysons will necessitate a departure from past approaches to planning and implementation. Identifying the vision will not be enough. **The true measure of the vision will be what happens in the next step – implementation.***

Tyson's Plan, p. 13.

The County staff, the Planning Commission, and the Board of Supervisors all recognized the inherent difficulties in implementing their complex vision -- transforming a successful, albeit traffic-filled suburban community into an urban environment less dependent on the automobile. This Fairfax County Department of Transportation "ramp study" is only the first of many studies, many road choices, and many development choices that County leaders will need to make. Our Neighborhood Coalition asks that the County, in fact, "balance the needs of the greater community, the public sector, and the private business sector" (appreciating, of course, all the community's environmental "needs" listed earlier in the very same Comprehensive Plan), "necessitate a departure from past approaches", and do what is right. Take the FCDOT Option off the table that would allow a four-lane highway ramp through the Old Courthouse Spring Branch Stream Valley EQC/RPA.

2. The Environmental Stewardship Section is Explicit about Protecting and Enhancing Old Courthouse Spring Branch Stream Valley and Prohibiting a Road or Highway Ramp.

In the Environmental Stewardship section, pages 72-85, the Plan provides unambiguous directions for the Old Courthouse Spring Branch Stream Valley. It indicates, "***Stream valley park expansions [areas around the RPA] should not include large hardscape areas (other than trails) and resources management should drive park design.*** There are sound reasons for requiring this protection, including:

a. Environmental Sustainability is Critical to the Tysons Corner Plan

The Board of Supervisors has big plans for Tysons Corner's environmental sustainability. From the very first words of the section:

Tyson's has a unique opportunity to become a leader in environmental stewardship through the protection and improvement of both the man-made and natural environments. The plan for a future Tyson's recognizes that these environments cannot be addressed in isolation or independently. ... In addition, the plan for a sustainable Tyson's calls for enhanced stormwater management, ... and the provision of a green network of parks, open space and trails. The goals and objectives identified by this section will ensure that Tyson's redevelops as a model sustainable community, creating a healthy and environmentally responsible place to live, work and play.

*The vision for a sustainable Tyson's recognizes an evolving approach, with a long-term goal of carbon neutrality (i.e., no net increase of greenhouse gas emissions from Tyson's). ... Improved air quality, ... , **stream restoration and protection**, ... and restored and enhanced natural environments **can all be achieved now.***

Tyson's Plan, Environmental Stewardship, page 72.

Are our County leaders, the same ones who wrote this language, seriously planning a four-lane impervious surface full of automobiles through a protected stream valley park?

b. Natural Resources Management

Pages 74-75 of the Tyson's Plan, Environmental Stewardship section, contain the first mentions of protecting Old Courthouse Spring Branch Stream Valley by name. There are two "stream valleys" in Tyson's Corner – Scotts Run and Old Courthouse Spring Branch. There are four watersheds named: Scotts Run, Old Courthouse Spring Branch, Rocky Run, and Pimmit Run.

These specific details about how to manage Tysons Corner’s natural resources are a compelling argument against a four-lane highway running through one of the named stream valleys or watersheds. **“Protection, enhancement and management of natural resources in the existing stream valley parks [such as Old Courthouse Spring Branch] is critical to the long term viability of those habitats. ... Stream restoration will also enhance the stream valley parks which are key components of Tysons’ green network.** ... These are strong statements. See the entire language, as follows:

Protection, enhancement and management of natural resources in the existing stream valley parks in Tysons is critical to the long term viability of those habitats. Both Scotts Run and Old Courthouse Spring Branch and the forested floodplains that surround them have been negatively impacted by years of unchecked stormwater runoff, consumption of understory plants by deer, and encroachment by non-native invasive plant species. Without active management of the natural resources in these parks, habitat and stream quality will continue to decline.

Contributions from development in Tysons towards stream restoration and stabilization in the Scotts Run, Old Courthouse Spring Branch, Rocky Run and Pimmit Run watersheds should be encouraged as part of a comprehensive strategy to restore the water quality and ecological health of Tysons’ streams. Associated improvements to the receiving streams and downstream areas could provide greater stability and water quality and improve instream habitat. Stream restoration will also enhance the stream valley parks which are key components of Tysons’ green network.

Environmental enhancement efforts should be encouraged and should include efforts such as restoration planting in natural areas, invasive plant control, deer management, stream restoration, and creating new natural areas (including both forested areas and meadows) where disturbed areas currently exist. These expanded natural areas could build on the stream valley parks, adding land that increases riparian buffers and enhances stream valley corridors. Natural areas outside of Resource Protection Areas could serve as nodes for human activity and greatly improve quality of life while relieving stress on existing riparian areas. Stream valley park expansions should not include large hardscape areas (other than trails) and resources management should drive park design.

See Tysons Plan, Environmental Stewardship, page 74-75.

The Board of Supervisors made its intentions quite clear. The stream valleys/watersheds should be protected, enhanced, and restored to restore the “water quality and ecologically health of Tysons’ streams.” Also, as documented in the Policy Plan Element as a key principle, the Plan indicates, “Stream restoration will enhance the stream valley parks which are key components of Tysons’ green network.”

Lastly, and very importantly, the Board of Supervisors indicates that the stream valley parks should be expanded, increasing the riparian buffers and enhancing the stream valley corridors. **“Natural areas outside of Resource Protection Areas could serve as nodes for human activity and greatly improve quality of life while relieving stress on existing riparian areas. Stream valley park expansions should not include large hardscape areas (other than trails) and resources management should drive park design”.** FCDOT plans for the Boone Boulevard extension and a four-lane access to the Dulles Toll Road must follow this guidance. The Plan is clear -- the RPA should be expanded, not destroyed by more asphalt, impervious surfacing, and vehicular use.

c. Tree Canopy Goals

The Plan continues with further supportive language about the benefit and need for trees. Again, Old Courthouse Stream Valley Park is mentioned:

*“Trees provide numerous environmental and human health benefits and should be considered an essential element in the vision for a new Tysons. Environmental benefits include stormwater management, energy conservation, and mitigation of ozone and carbon in the air. When clustered together, as in a park setting, trees provide habitat areas for wildlife. ... In 2009, tree canopy covered about 20% of the total land area in Tysons. Much of the tree cover in Tysons is provided in the Scotts Run and **Old Courthouse Stream Valley Parks** ... “*

See Tysons Plan, Environmental Stewardship, page 74-75.

d. Parks And Recreation

County leaders recognize the environmental importance of parks, the impact on the quality of life, and that parks provide a “sense of place for Tysons and its individual neighborhoods.” Well, that is certainly true of the 15 neighborhood associations opposing a highway ramp through Old Courthouse Spring Branch Stream Valley. The families living in those 1500 households, many who live adjacent to the park, certainly view the park as an important part of their neighborhoods.

Parks, recreation and open space are essential throughout Tysons. A comprehensive park system helps to provide a high quality of life for residents by contributing economic, social and health benefits. Such amenities provide visual breaks in the urban landscape, create oases of green in an intensely urban environment, and provide places for people to enjoy passive and active leisure pursuits. Public open space is especially important for residents of higher density housing who may lack access to private yards or recreation facilities. Urban parks improve air quality, reduce stormwater runoff and impervious surfaces, improve community health, and provide opportunities to allow people a full range of leisure pursuits and to meet their neighbors in a safe environment. Parks will help provide a sense of place for Tysons and its individual neighborhoods.

Tysons Plan, Environmental Stewardship, page 76.

Furthermore, “The vision for Tysons calls for a “green network,” or a comprehensive system of parks and open spaces that connects all the districts within Tysons through greenways.” Tysons Plan, page 77. We have not discussed this extensively in this Position Paper, but cutting off Old Courthouse Spring Branch -- intended as a critical element in the greenway in the West Side District – would thwart the pedestrian-friendly and bike-friendly vision of the Board of Supervisors.

1. Green Network Components

Again, the language explicitly describes the plan for Old Courthouse Spring Branch: **“These stream valley parks should not only be protected from development and infrastructure impacts, but be restored and enhanced...”** The next sentence describes it further, mentioning: **“restoration efforts along these stream valleys in order to strengthen Tysons’ existing natural systems and allow for resource protection and interpretation..”**

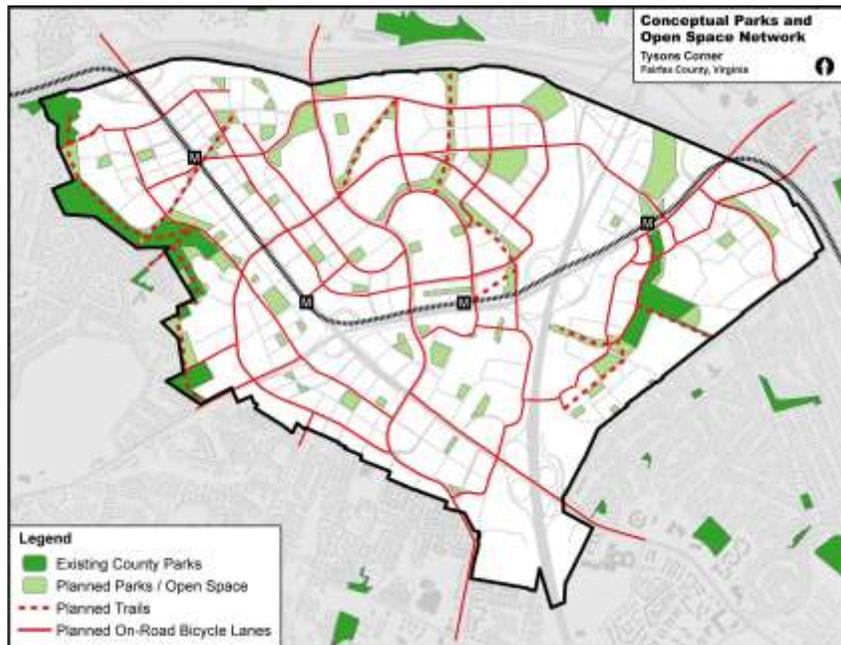
*“Stream valley parks such as Scotts Run and **Old Courthouse Spring Branch** provide natural buffers and potential connectivity to and throughout Tysons. If linked to other parks and open spaces within Tysons, they will help serve non-motorized transportation needs. **These stream valley parks should not only be protected from development and infrastructure impacts, but be restored and enhanced.** Redevelopment in Tysons should contribute to stream and riparian buffer restoration efforts along these stream valleys in order to strengthen Tysons’ existing natural systems and allow for resource protection and interpretation. These stream valley parks can be expanded through dedications of privately-owned portions of the stream valley and in adjacent areas to provide better connectivity. They can serve as major linear urban parks and support the planned trail system with a variety of natural landscapes. These parks will provide a variety of passive*

outdoor leisure experiences for residents, visitors and workers in Tysons, including outdoor exercise and enjoyment of quiet natural spaces.”

See Tysons Plan, Environmental Stewardship, page 78. With a four-lane highway offramp and/or a four-lane “Avenue” running through the linear green space, this unambiguous goal is unachievable.

2. Conceptual Parks and Open Space Network

To summarize the park plan, the Tysons Corner Plan lays out the “Conceptual Parks and Open Space Network” – delineating Old Courthouse Spring Branch Stream Valley in entirely green, with only planned trails going through it. The “Planned On-Road Bicycle Lanes” are only near it by Gosnell, but nowhere nearby after it passes Vesper Lane’s planned trail.



3. The “West Side” and “Tysons West” District Recommendations are Equally Unambiguous about Protecting and Enhancing Old Courthouse Spring Branch Stream Valley.

As the Old Courthouse Spring Branch Stream Valley is a part of the “West Side District,” that section contains the most specific details about the uses for the parkland. The Tysons Plan specifically delineates the Old Courthouse Spring Branch Stream Valley Park as part of its very own “Old Courthouse Spring Branch Subdistrict,” to be highlighted as “key feature,” a “visual and physical separation between Tysons Corner and the adjacent neighborhoods,” “preserved with its dense vegetation,” “a substantial barrier from the DAAR,” and to be developed only with “multi-use trails” to provide passive recreational uses and pedestrian and biking access to the Metro from surrounding neighborhoods.

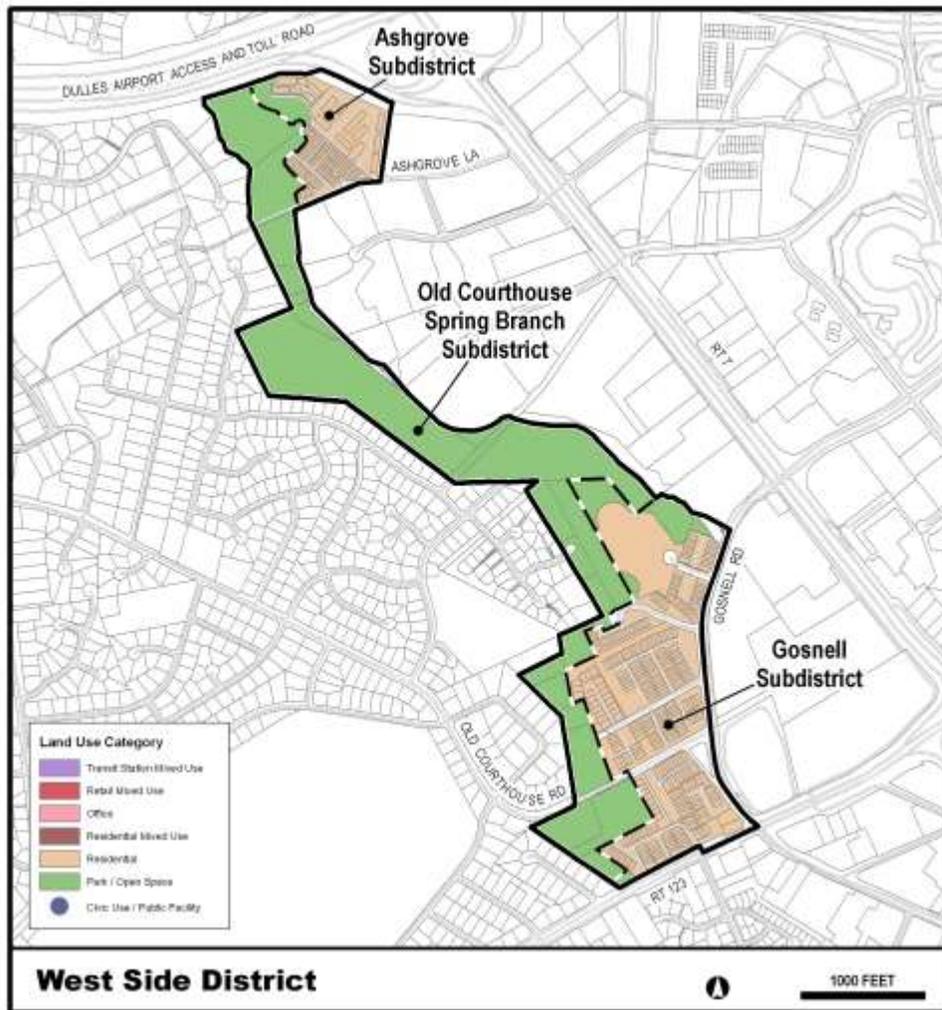
a. West Side District

The West Side District is developed with two residential neighborhoods and includes the **Old Courthouse Spring Branch Stream Valley Park as a key feature**. This stream valley park, along with Freedom Hill Park and Raglan Road Park, result in about half of the land in this district being park land. Because of its location on the edge of Tysons, the West Side District serves as a transition from planned high intensity mixed use in the Tysons West and Tysons Central 7 TOD Districts to the single family neighborhoods just outside of Tysons. The residential development in the West Side District is mostly single family townhouses with some multi-family use, including housing for seniors. **The Old Courthouse Spring Branch Stream Valley Park should be developed with multi-use trail and other passive recreational facilities**. Planned “green” street connections will tie the Tysons West Metro station to the West Side District, drawing people to the public amenity provided by Old Courthouse Spring Branch Stream Valley Park. Sidewalk and trail connections will provide enhanced access to Metro and other transit from surrounding neighborhoods.

Tysons Plan, District Recommendations, West Side District, page 158.

The map on page 159 clearly shows the Old Courthouse Spring Branch Subdistrict in green (“park/open space”). is all in green, no roads/avenues/highway ramps going through it. The paragraph immediately before indicates that “most land within these subdistricts has already developed in a manner consistent with the vision...”

WEST SIDE DISTRICT MAP



OLD COURTHOUSE SPRING BRANCH SUBDISTRICT

The **Old Courthouse Spring Branch Environmental Quality Corridor (EQC)**, Raglan Road Park, Freedom Hill Park and other publicly owned land form the western boundary of the West Side District. This portion of the district **provides a visual and physical separation between Tysons Corner and the adjacent neighborhoods. The Old Courthouse Spring Branch EQC, which has been preserved with its dense vegetation, provides a substantial barrier from the Dulles Airport Access Road (DAAR) southward toward Gosnell Road.**

There should be a trail along the **Old Courthouse Spring Branch Stream Valley Park** from Gosnell Road on the south to Old Ashgrove Lane on the north. In addition, two or three short trails should cross the stream valley and connect the adjacent residential communities to Tysons. These short trails include Old Ashgrove Lane, where the existing bridge should be used for pedestrian and bicycle access and remain closed to automobiles; the Dominion Power line easement, which could be connected to Vesper Street on the west; and a possible trail through Raglan Road Park.

Please note that the Plan refers to the Stream Valley with its property category again, as an Environmental Quality Corridor – protected parkland. It refers to the Stream Valley as an EQC two times.

The function of this park, apart from its being aesthetically pleasing as a buffer, “has been preserved with its dense vegetation, [and] provides a substantial barrier from the Dulles Airport Access Road (DAAR) southward toward Gosnell Road.” This is the same language from previous versions of the Comprehensive Plan. There is not -- and has never been – a plan for a four-lane highway ramp through the Old Courthouse Spring Branch Stream Valley EQC.

Furthermore, in the “**Ashgrove Subdistrict**” section, County leaders recognized that the acreage near Westwood Village also contained protected land in references to the “Old Courthouse Spring Branch EQC” two more times. The Plan indicates, “The EQC located on both sides of Old Courthouse Spring Branch has been preserved as public open space through dedication to the Fairfax County Park Authority.” A few sentences later, when detailing building heights, the Plan refers to the “*remaining area east of the Old Courthouse Spring Branch EQC.*” Plan, page 161.

See Tysons Plan, District Recommendations, West Side District, pages 158-161.

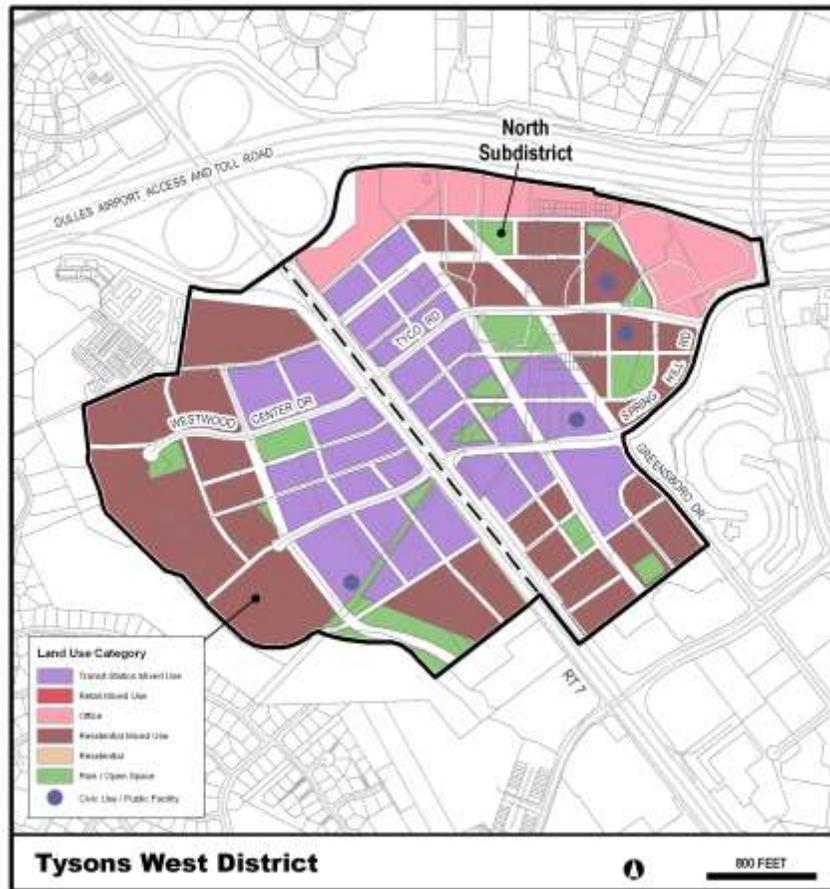
b. Tysons West

Moreover, if access to the Dulles Airport Access Road (the DAAR) from a Boone Boulevard extension was determined necessary at all (see subsequent section on “Transportation” about the options to access the DAAR), it was clearly envisioned to be located in the “Tysons West District – South Subdistrict,” not the West Side District (which contains Old Courthouse Spring Branch Stream Valley, as noted in the earlier section). “*The major vehicular circulation and access improvements in this subdistrict are the extension of Boone Boulevard and planned new ramps from the Dulles Airport Access Road connecting to Boone Boulevard....*”

The Plan indicates that development applicants must accept the grid of streets into their rezoning applications, or they will not be able to get the desired densities. The plan also indicates that “*redevelopment should occur in a manner that fosters vehicular and pedestrian access and circulation. ... Redevelopment along planned streets alignments should provide right-of-way, construct portions of the street integral to the development, and further the implementation of streets serving the development.*”

Moreover, redevelopment with increased density is only allowed if transportation access is implemented. “The ability to realize planned intensities will depend on the degree to which access and circulation improvements are implemented...” See Tysons Plan, District Recommendations, Tysons West District, page 123.

Tysons West, which emphasizes the need for Boone Boulevard expansion, indicates that the “Avenue” is much further north from the Old Courthouse Spring Branch stream valley. See map below. This is consistent with later Plan language that requires Tysons West Redevelopment Applicants to provide the “multi-use trail along the adjacent stream valley park land,” not a road, avenue, or highway ramp near the parkland.



See Tysons Plan, District Recommendations, Tysons West, map on page 121. Please also see Map 7 on p. 49 of the Tysons Corner Comprehensive Plan (attached in Section III - Transportation - of this Position Paper).

B. VIENNA PLANNING DISTRICT REINFORCES THE LANGUAGE OF THE TYSONS CORNER URBAN CENTER

Furthermore, building a highway ramp through a Stream Valley with mature trees implicates the critical issue of the impact on the surrounding existing residential areas. The Plan specifically notes that the EQC serves another function: as a buffer for the surrounding community from the sights and sounds of the emerging Tysons Corner to preserve the residential look and feel. The EQC is planned as a natural pathway and linear urban park which will enhance the quality of life for both new residents of the Tysons Corner developments, and for existing residents.

“A natural buffer zone should be preserved and maintained along the Old Court House Spring Branch Stream Valley from the Dulles Airport Access Road to Gosnell Road, and from the stream valley to Freedom Hill Park. In addition to the stream valley and land already dedicated or about to be dedicated to the County for open space, this buffer should include the stream influence zone and any tree stands which protect the adjacent low density residential areas from the visual intrusion of the existing and planned high intensity uses in the Tysons Corner Area. The whole of this buffer zone should be incorporated into the Old Court House Spring Branch Environmental Quality Corridor.”
Vienna Planning District, Amended 6-19-2012.

See <http://www.fairfaxcounty.gov/dpz/comprehensiveplan/area2/vienna.pdf>

For the Vienna Planning District part of the Comprehensive Plan, page 66 begins the discussion of V-3 Spring Lake Community Planning Sector.

Surely, a four-lane highway ramp would contradict this clear language as well.

C. FAIRFAX DESIGN GUIDELINES RELY ON COMPREHENSIVE PLAN “AREA PLANS”

Earlier this year, in January 2012, the Fairfax Board of Supervisors approved the Tysons Urban Design Guidelines, which augment the Urban Design recommendations contained in the Tysons Corner part of the Comprehensive Plan (approved in June 2010). According to the County, these guidelines will be used by the development community, residents, and staff to guide the rezoning and development process. They will offer specific guidance for: Planting design and materials, Building Design and materials, and Urban Park design. Please refer to http://www.fairfaxcounty.gov/tysons/design/download/6_udg_parks.pdf, for the applicable Urban Park sections.

“Further, urban parks improve air quality, reduce stormwater runoff, provide biodiversity and improve community health. ...

*Within Tysons there are opportunities to enhance the existing parks and integrate them into the urban fabric. **Scotts Run Stream Valley Park and Old Courthouse Spring Branch Park are existing stream valleys in Tysons that serve as green buffers as well as offer numerous ecological benefits. They have the potential to offer additional pedestrian circulation routes and an informal place to recreate and experience natural systems in Tysons.***

The Comprehensive Plan calls for protection and restoration of stream valleys. It also suggests that the stream valleys could become “major linear urban parks and support the planned trail system with a variety of natural landscapes.” These parks should be ecologically repaired and improved to function as part of the urban park network and provide connectivity and recreational resources to those who live, work, and visit in Tysons. Other existing parks within Tysons can also be reconsidered and potentially redesigned to enhance the Tysons urban park network.”

Again, let us note that this very strong language was approved by the Fairfax Board of Supervisors earlier this year, in January 2012. It is very clear from the entire Comprehensive Plan, from amendments to the Plan approved in recent years by the Board of Supervisors, and by these Design Guidelines that County leaders agreed, intended, and promised to protect Old Courthouse Spring Branch Stream Valley EQC/RPA, not to allow the Department of Transportation to destroy it with a four-lane highway ramp. Such a proposal would obliterate the vision of a Green Tysons in its very first year of implementation!

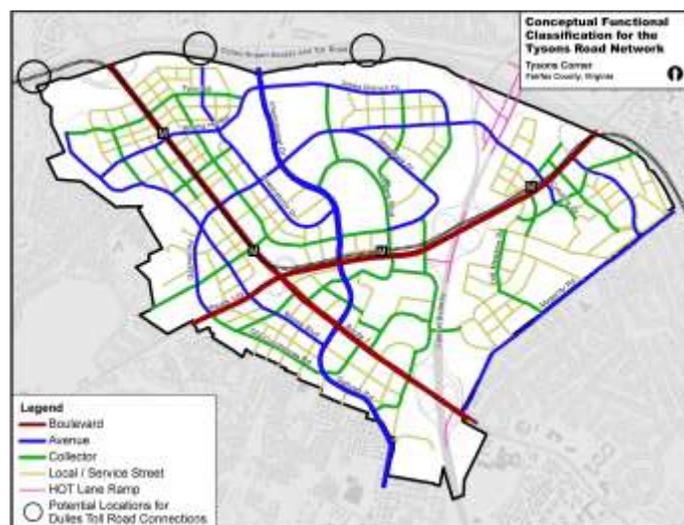
III. Transportation Section Does Not Require Boone Boulevard Access to the Highway

Lastly, and very importantly, there is no mandate for a Boone connection to the Dulles Toll Road in the Comprehensive Plan. The Plan indicates three potential ramps to access DTR (including naming Boone Boulevard), however, there is an extremely important note:

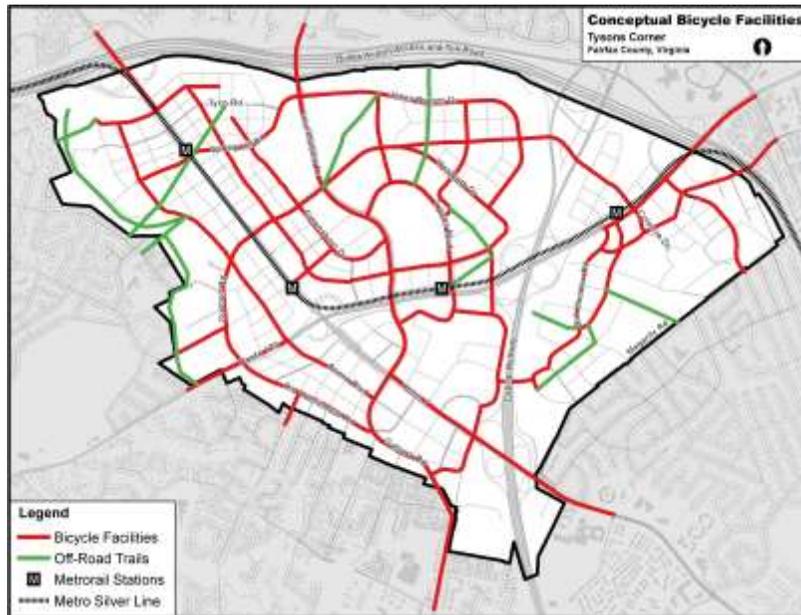
“The connections to the DTR listed above and their exact locations are subject to more detailed analyses. A preliminary analysis found that a maximum of two additional ramps [exiting and entering]... is necessary.” (see page 57).

The idea of a highway offramp extending into an “Avenue” entitled the Boone Boulevard Extension is one of multiple *potential* ways to connect the transformed Tysons Corner to the Dulles Toll Road (DTR). Currently, the location of this proposed ramp either collides with an existing multi-story hotel or runs through the last remaining green space and sole buffer between the existing communities and the emerging Tysons Corner. The transportation section *suggests* a connection using the Boone Boulevard Extension as one of three options, but more clearly indicates the need for further analysis and a need for only a “maximum of two additional ramps” (despite listing the three potential places). This position is consistent with the following sections:

- Legislative History – The Plan specifically includes ambiguous circles for “Potential Locations for DTR Connections” instead of precise lines on the map because Planning Commissioner Frank de la Fe said that he would not support a road going through the EQC. Tysons Committee Chair Walter Alcorn confirmed this communication in June 2010, before the Planning Commission approved the Plan language. See Transportation section, p. 49 for the map.



- Inconsistent with Bike- and Pedestrian-Friendly Principles -- The proposed highway access ramp would prohibit access by bicyclists as indicated in the Bike Path on page 58. This is also inconsistent with all language about Tysons being bicycle- and pedestrian-friendly. See Transportation section, p. 58.



Conclusion

The Tysons Committee, the Planning Commission as a whole, and the Board of Supervisors are all consistent in their intent and language in the Fairfax County Comprehensive Plan as well as the specific sections providing the goals for Tysons Corner. As part of the County’s broad vision of Tysons Corner, and its specific “Environmental Stewardship” requirements, the Old Courthouse Spring Branch Stream Valley EQC/RPA is supposed to be protected, enhanced, and expanded, without even a “hardscape” in the expanded area (but for maybe a walking trail).

A highway ramp through the area planned for multi-use access to the Metro will impede pedestrian and bicycle access to the station from adjacent neighborhoods, the W&OD trail, and from the Town of Vienna. This obstruction is also inconsistent with the specific maps and general principles repeated throughout the Comprehensive Plan.

Furthermore, as indicated in the Tysons West District, with similar language repeated throughout the districts, The Comprehensive Plan very clearly indicates that the development applicants must bear the responsibility of the grid of streets into their rezoning applications, or they will not be able to get the desired densities. The Comprehensive Plan repeats this important theme -- density is only allowed if transportation access is implemented, “The ability to realize planned intensities will depend on the degree to which access and circulation improvements are implemented...”

So please take out any transportation option that places a highway ramp or road through the Old Courthouse Spring Branch Stream Valley. It is inconsistent with the Comprehensive Plan, and it is not good County policy.

If you have any questions or comments about this issue, please contact Pam Kondé, President, Greater Tysons Green Civic Association, at pkonde@cox.net. Thank you for your consideration.