



Metropolitan Washington Council of Governments
777 North Capitol St. NE, Suite 300
Washington, DC 20002
September 12, 2012

Chairman Principi and members of the Board,

This letter conveys the attached Sierra Club position regarding the proposed update of the Council of Governments (COG) Activity Center Map that will come before you for approval by yearend. The Sierra Club entities that have adopted this position (listed below) represent approximately 10,000 members in the region. Growth patterns and their impact on the environment have long been a major concern of ours.

We recognize that the Council of Governments has limited ability to influence local land use decisions and that jurisdictions guard this authority. We also understand that COG staff will continue to provide a more refined analysis that will inform member planners and elected officials of possible benefits to having a less dispersed development pattern.

While we appreciate the effort that has been started, we believe that the Board has an opportunity, by taking a more regional perspective, to improve the process. Acceptance and implementation of these recommendations will require your direct leadership. Please give them your full consideration,

Sincerely,

Alvin Carlos, Chair
Montgomery County Group
4740 Bradley Blvd, Apt 320
Chevy Chase, MD 20815

Linda Burchfiel, Chair
Great Falls Group
1605 Maddux Lane
McLean, VA 22101

Dean Amel, Chair
Mount Vernon Group
3013 4th St North
Arlington, VA 22201

Sierra Club position on the proposed Council of Governments “Activity Centers Strategic Implementation Plan” and Map

The Sierra Club has supported Region Forward since its inception over 3 years ago. We recognize that the broad goals of sustainability, prosperity, accessibility and livability are proper goals to seek and invest in. We applaud the progress so far and the dedication shown by all participants. Yet we believe that this most recent proposal regarding Activity Centers is potentially harmful because there are too many sites named as centers and some are poorly selected. Such a list has the potential to legitimize sprawl rather than contain it.

The set of Activity Centers (ACs) indicated in the draft and the criteria described for their selection have the potential to interfere with progress toward some of the goals of Region Forward, notably to locate growth in Activity Centers, defined here as dense, walkable communities served by accessible transit, including evenings and weekends. Indeed, transit should be one of the Core Attributes. Having too many sites, i.e. overcapacity for likely growth, will dilute efforts to focus investment on areas that have the best potential. This would be especially important when decisions are made on prioritizing new public transit routes, presumably to some of these centers. Throughout the evolution of this project, the issue of the east-west divide has been acknowledged, but not addressed. While the activity centers designated to the east will ameliorate sprawl and congestion, this is counteracted by the number of activity centers to the west and north, and the far-flung nature of some of these. The selection of activity centers by a proper use of criteria is one way to try to make a tangible improvement of this critical problem.

The following lists some concerns that need to be addressed:

- The Baseline Progress Report shows only 46% of commercial space being constructed in ACs in 2010 compared to a goal of 75% (pg 14). The percent of residential construction in ACs is 31% and projected to decline against a goal of 50% (pg 15).
- Outside investors may be misled by a COG “endorsement” of an unjustified site as an AC.
- The concept of reformatting a former large AC into several smaller ones changes nothing. It still sanctions sprawl.
- Attempting a “fair distribution” of ACs to all jurisdictions will result in some weak sites to be included and some deserving ones to be omitted. It should not be a goal. It may be possible to avoid this by strict adherence to well-chosen criteria.
- Evaluating density based on speculated conditions 30 years hence and dependent on a fickle market is too uncertain.

We therefore recommend as revisions to the Activity Center Plan that:

- 1) The Region Forward Coalition should be very judicious in naming sites as ACs so as to focus limited resources and simplify planning.
- 2) Every rail station (Metro, light rail or commuter lines with daily and weekend service) be named as an AC unless the local jurisdiction objects.
- 3) Former large ACs may become singular ACs (by meeting the criteria) and jurisdictions may identify nearby areas as satellite centers.

- 4) A common definition for a “priority growth area” named in the first core attribute be adopted.
- 5) The density description be revised to a more near-term level, such as current density plus the expected result of any rezoning applications. Adopt a fixed numerical level of persons per acre in place of the rule of “in the top half for the jurisdiction.”
- 6) Set an upper limit on the size of an AC, such as 1000 acres.
- 7) Revise the Additional Attributes to be an even more flexible structure. Establish, when possible for a given criterion, two levels of attainment of an attribute. By raising rail stations to a singular core attribute, there can be a criterion for bus service. The choices for additional attributes might look like:

Criterion	High measure	Low measure
Intersection density	60	50
Bus hourly capacity (or frequency)	300 ?	200 ?
Land use mix	Leave as is	
Affordability – H & T costs	<45%	<40%
(New) Community Support	Active, open	Minimal opposition

These criteria could all be encouraged by using for example, high-low choices and combinations. If the higher values can be met, 3 of 5 measures added to the 2 core values will suffice, or 4 of the lower values can be used. To address the aforementioned East-West divide issue, an exception should be included to accept sites east of the Anacostia River that meet only 3 of the lower measures for additional attributes. These example values can be adjusted from the original levels according to what is learned in the typology analysis.

- 8) There be a defined process for adding and dropping ACs at defined intervals. If the growth is greater than projected overall, then additional ACs can be identified to help absorb it. On the other hand, if growth overall is slower than expected, having too many ACs competing for investment dollars will not likely be beneficial for many of them that did not reach a critical threshold.

Attachment: a list of which ACs we consider poor selections and those we might add.

~~Montgomery County Group~~ ~~D-Chapter~~
~~Great Falls Group~~ ~~DC-Chapter~~
~~Mount Vernon Group~~ ~~VA-Chapter~~

Questionable Activity Centers listed in the current plan

Maryland

- 1) Fort Detrick
- 2) Jefferson Tech Park
- 4) East Rising
- 5) Francis Scott Key Mall
- 6) Brunswick
- 7) Urbana
- 8) Clarksburg
- 47) Westphalia

Virginia

- 104) Dulles East
- 105) Dulles South
- 111) Beltway South
- 121) One Loudoun
- 123) Rt 28 North
- 124) Rt 28 Central
- 125) Rt 28 South
- 130) Yorkshire
- 133) Potomac Shores
- 136) Manassas Airport

Worthwhile Virginia sites that are missing:

Annandale
West Falls Church
Lorton VRE station
City of Vienna/Vienna Metro