

## writtentestimony

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**From:** Dan <dan\_amon@hotmail.com>  
**Sent:** Saturday, February 28, 2015 3:23 PM  
**To:** writtentestimony  
**Subject:** Development at Takoma Metro

WMATA,

We live at 7015 Eastern Ave, directly across from the proposed development, and have the following concerns:

- The attachment H concept drawings do not contain any elevation drawings so it is not possible to understand the impact the overall look of the development will have on the adjoining neighborhood. 40 plus foot elevations next to Eastern Ave, still seem excessive, these elevations could be further reduced to match the existing rental properties along Eastern to blend this elevation of the development with the neighborhood
- The interim parking plan is weak and will cause massive disruption to traffic, both vehicle and pedestrian
- The traffic impacts will not be limited to a couple of intersections as stated in the staff comments, but will be throughout the whole of Eastern Ave and Cedar Ave.
- The other major developments that have come on-line within the past couple of years all have underground tenant parking, yet this development continues to stick with on-grade parking as the only option. Obviously other developers have made their economics work with underground parking, why can't EYA and WMATA even consider this option? This would help lower the overall elevation of the project
- The current elevator access to the metro is overcrowded and continues to have maintenance and operation issues. Adding additional traffic to the existing elevator access will only increase these problems, yet this issue is not ever addressed in the staff comments or developers proposal
- The current bus shelters are underused and mostly empty, yet two additional shelters are proposed under this development, this does not seem necessary or required. Where is the detailed study/information backing up this portion of the proposal?

Dan Amon and Molly Madden  
7015 Eastern Ave  
Takoma Park, MD 20912  
(301) 585-8199

## writtentestimony

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**From:** Jeff Blum <jdblum7@gmail.com>  
**Sent:** Sunday, March 01, 2015 12:53 PM  
**To:** writtentestimony  
**Cc:** 'Peter'; Chris Simpson  
**Subject:** Docket # R14-01

March 1, 2015  
WMATA Board Members  
Office of the Secretary  
Washington Metropolitan Area Transit Authority  
600 Fifth Street, NW  
Washington, DC 20001

**Re: Docket No. R14-01:**  
Proposed Changes to WMATA Facilities at Takoma Metro Station

Dear WMATA Board Members:

As both a resident of Takoma Park and a regular user of the Takoma Metro station for the last 15 years, I fully associate myself with the position, stated below, of the DC-MD Neighbors for Takoma Transit. I have watched this project carefully, and wrote you concerning it in 2006. In addition, I have been an avid pro-transit and smart growth since the 1980's, including actively on behalf of WMATA since I became a Maryland resident in 1993. Some of my activities have included:

- Founder and vice-president, Washington Regional Network for Livable Communities (WRN).
- Member, WMATA Regional Mobility Task Force (perhaps that was not the official name)
- Chair, Quality of Life Task Force, Council of Governments 2020 Vision study
- Founder and director, national Campaign for Efficient Passenger Transportation, 1995-97, on whose board sat representatives of APTA, CTAA, Amtrak, the ATU, the TWU and the Surface Transportation Policy Project.

So I write to you in a spirit of full support for the mission and needs of WMATA, and understanding the many constraints, political and financial, under which you operate. I believe that WMATA will succeed most fully and least contentiously by actively reaching out to the communities who constitute its neighbors, riders and taxpayers – most especially those who, like Takoma Park, have long proven ourselves as advocates on your behalf.

The gist of the letter below comes down, I believe, to that concept: that we and you can be more successful together than at odds, that we all do better when we all do better. And I believe that EYA, as a developer focused on infill, understands that and can be encouraged to reach for the most creative solutions when it, you and we all work together.

Thank you for your consideration.

Sincerely,

Jeff Blum  
7310 Cedar Ave.  
Takoma Park, MD 20912

**DC-MD Neighbors for Takoma Transit**

February 23, 2015

WMATA Board Members  
Office of the Secretary  
Washington Metropolitan Area Transit Authority  
600 Fifth Street, NW  
Washington, DC 20001

**Re: Docket No. R14-01:**  
Proposed Changes to WMATA Facilities at Takoma Metro Station

Dear WMATA Board Members:

We are writing as members of DC-Maryland Neighbors for Takoma Transit, a group of neighbors who live in the Washington, DC and Maryland neighborhoods near the Takoma Metro Station joint development site that is the subject of this hearing.

We support a multifamily building at this location. We like the idea of replacing the large existing surface parking lot with a project that will provide housing for new members of our neighborhood that we love so much. We especially support keeping the green space at Cedar and Carroll Streets as a permanent public park and the green space adjoining the garden apartments on Eastern Avenue as a permanent green buffer. We believe a well thought-out, properly designed project can provide additional housing units, strengthen the neighborhood and the local economy, and improve access to transit.

#### WE HAVE RESERVATIONS ABOUT THE CURRENT DESIGN

We have serious reservations about the scale of the proposed building, and especially the height, setbacks, buffer and massing, in relationship to the existing buildings in the residential neighborhood as well as the buildings along the commercial streets. We also have reservations about the amount and location of both the public WMATA parking and the private residential parking. **Because of these reservations, as described in more detail below, we urge the WMATA Board to postpone a final vote on the Compact Hearing report to allow for a continuation of the promising discussions that have begun to take place between the community and the developer, and to include certain conditions relating to design as part of the final vote.**

#### PODIUM PARKING AND WMATA PROCESS

It is clear that the proposed location of the transit elements and the transit parking dictate, to a large extent, the building design and massing, and cannot be evaluated independently. The WMATA staff report states, *“Staff believes that the proposed transit facilities can be evaluated independently of aspects of building design that do not physically intersect with those facilities.”* However, the proposed parking lot DOES physically intersect with the building. The layout of this fully one-acre surface lot dominates the site and gives prominence to cars over all other modes of access. The parking structure is not a garage. There are no walls. This is an open surface parking lot that covers about two-thirds of the site, and it is underneath a podium-style building that sits on top of the parking lot. Only the front portion of the building along Eastern Avenue is built to the ground. Most of the first floor of the building has no sides, and the drive aisle for the parking lot is outside of the upper stories of the building wall, making screening ineffective. Many podium buildings similar to this were built in the 1970s and 80s as part of Urban Renewal programs, but this style has gone out of favor ever since New Urbanism recognized the importance of the traditional urban form in creating desirable neighborhoods.

The classic urban form is a building with a base, middle and top. This form is the key to the pedestrian experience. The base is most important, and it should be activated through entrances, windows, or stoops and porches. Activating this edge of the building, where so many pedestrians and bus riders will walk and wait, is critical. The bus loop and sidewalk

along this edge of the building function as a public street, just as much as Eastern Avenue, and like Eastern Avenue it will be perceived as the frontage for the building. It will also be highly visible from Cedar and Carroll Streets, through the park. It would be desirable to have an attractive building façade along the length of this “street,” punctuated by some ground level open space, not a view of cars, paving, bright security lights and potentially worrisome hiding places in the shadows created by pillars and cars.

#### WE ARE DISAPPOINTED IN THE LACK OF CONTEXT SHOWN IN CURRENT PLANS

We acknowledge that the developer has made some meaningful changes that begin to address the community’s concerns, as demonstrated in Exhibit H. However, we are disappointed that the developer has still not provided any contextual information. This is a big site – it is the full size of a typical Takoma Park block – and it’s a big building. It’s nearly 400 feet long and varies from 160 to 230 feet wide. (In comparison, the nearby Gables multi-family development is 275 feet long and 175 feet wide.) The Takoma Metro development is currently planned to be four stories high in the front (45’8”) rising to over 75 feet in the back. Welcoming a project of this magnitude into a single-family neighborhood would be a huge challenge. Getting it to a more manageable size is critical, but it is not possible to determine the appropriate setbacks, buffers, or building height and massing without information about the context of the project. Smart growth is not just about locating density at transit hubs. It’s about recognizing and respecting the context of what’s already there and providing an organic transition between the old and the new in order to create a great livable urban neighborhood.

The context should recognize, enhance and be compatible with:

- The historic houses directly across the street, and the historic neighborhood that unfolds around them
- The garden-style apartments adjoining the north boundary
- The views from Cedar Street and Carroll Street across the park
- The historic town center of which this is an extension
- The elevated metro tracks
- The topography of the site, which exists in a bowl
- The green space and tree canopies in the green space along Cedar Street and at the garden apartments on Eastern Avenue

As stated above, the developer has made several positive changes regarding the setbacks and height (along the garden apartments a partial 30-foot buffer and a 68-foot building setback is now proposed; along Eastern Avenue there would be a 30-foot setback, and the height steps back from 45 feet 8 inches along Eastern Avenue to 76 feet at the back of the site). Because the site is in a bowl, in order to determine the extent to which further changes are needed, it is vital that contextual information be provided. Arriving at an opinion on additional changes that would be needed to make the project compatible with the surrounding neighborhood -- especially in terms of height, massing and setback -- without that information would be irresponsible.

One opportunity to reduce scale that should be explored further is placing the WMATA parking either in a structure or underground, and placing the residential parking underground. Both of these solutions would substantially decrease the overall size of the building. Underground parking, which has been constructed for all the recently built area apartment buildings, is preferable, as it provides for the maximum amount of space for people and open space at the ground level. But, even structured parking is superior to the surface parking that is proposed under the building.

#### GREEN SPACE

Another unresolved issue that has a direct bearing on the WMATA Board’s decision is the amount of proposed green space. While it has been stated by WMATA that there will be a one-acre park along Cedar and Carroll Street, many in the community have understood that the entire area as it is now would become the park in perpetuity. According to WMATA staff, fully one-third of that site will be reserved by WMATA for future operations and will not be part of the

park. Unfortunately, the EYA drawings seen by many in the community did not show the boundary of that park, and WMATA staff has not clearly justified the need for future facilities expansion.

The second green space area that is unresolved is the green buffer adjoining the apartments on Eastern Avenue. While the developer is providing a partial 30 foot buffer, this is only for a portion of the buffer and it decreases to zero feet where the drive aisle abuts the property line. We are very concerned about the significant loss of trees and diminished square footage as it is currently proposed. The developer should provide a detailed plan for this green space, including precise size measurements, a tree protection and replacement plan, and permanent protection for the proposed buffer. In addition, the developer should explore ways to improve the site design that could lead to a larger green space buffer along this property line.

#### POSTPONE YOUR DECISION -- IT'S REASONABLE

As noted above, the transit components of this project cannot be completely separated from the design components, and we therefore believe the WMATA facilities should not be approved until there is further opportunity for the community to discuss the proposed design with the developer. Accordingly, we urge the WMATA Board to hold off on a final vote on the Compact Hearing report to allow those discussions to continue. However, regardless of when the Board votes on the Compact Hearing report, we believe that it is crucial to include some conditions in that approval as stated below. Furthermore, we wish to make it clear that we will not hesitate to put these transit issues and their impacts on the table as part of future entitlement processes, including zoning and historic preservation.

We do not wish to create demands that prevent a project from going forward at the site. Asking for the WMATA parking to be in a structure is not unreasonable, as there are examples all over the region at other Metro stations. Asking the developer to place the residential parking underground is not unreasonable, as there are several recent examples in Takoma Park. The WMATA surface parking could also be screened with liner units, for which there are many precedents, or placed underground. The Kiss & Ride and disabled entrances, and other spaces geared towards proximity to the elevator could remain in a much smaller surface lot. A possible reduction in the number of transit user spaces should also be explored, as the proposed number of spaces does not appear to have a basis that is supported through analysis and policy.

#### NEED FOR A PARKING STUDY

It should be acknowledged that parking is a major concern for many neighbors and visitors to the commercial district. Planners understand that there is often a gap between the amount of perceived and actual parking. The only way to counter this misperception is through a parking study and analysis, which would measure the actual capacity of the streets and parking lots surrounding the Metro station and compare it to the peak hour usage and anticipated demand. It should also take into account the point that an assessment of commuter parking needs, based primarily on current usage rates, is not a reliable approach, given the unusual parking restrictions currently in place there.

We should not be building more parking until we have used what we already have. Overbuilding parking is a scourge both in terms of cost to the developers (that money could have been spent on neighborhood benefits or higher quality architecture) and the neighborhood (in terms of having to live with a much larger building). It is important to explore the possibility of reducing the amount of parking on the site, or locating the parking underground, in order to achieve a smaller building, potentially with less living space or without reducing the living space.

#### TRAFFIC CONCERNS

Traffic impacts on the neighborhood are still a concern for the community. We note the traffic study done by WMATA recommends several changes to improve traffic flow, such as signal optimization and lane configuration on Carroll Street and Piney Branch Road. While we understand that these changes are under the purview of DDOT, not WMATA, and that the traffic impacts will be reviewed as part of the rezoning process, we would like to explore these options further at the earliest opportunity.

## PUBLIC SAFETY

Public safety is a key issue for the neighborhood, especially in and around the surface parking lot. There is a highly regarded tool called CPTED (Crime Prevention Through Environmental Design) that relies on a variety of physical design techniques, such as natural surveillance or “eyes on the street,” to deter potential criminal actions. While the WMATA staff have indicated that there will be lighting, column spacing and signage in the parking lot intended to address public safety, the techniques used by CPTED are also necessary to make pedestrians feel safer. Implementing CPTED typically reduces the overall costs of preventing crime, and is much more effective when implemented as part of the design process rather than retrofitted. We believe that a CPTED analysis of the WMATA facilities, especially the parking lot, should be conducted and should include input from the community and police departments from both the District and Maryland.

## WMATA BOARD ACTION AND CONDITIONS

Again, we urge the WMATA Board to postpone approval of this project to allow further discussions on design and related issues involving the developer and the community. More specifically, we request the WMATA Board to attach the following conditions to any approval of this project:

1. Direct WMATA staff to create a neighborhood advisory committee to provide comments on the design, parking issues, and other neighborhood impacts, as well as potential benefits and amenities; include WMATA representatives, developers, Office of Planning staff, and near-in, directly impacted neighbors from both Maryland and the District of Columbia.
2. Direct the developer to provide appropriate contextual drawings, sections, elevations and three-dimensional models to the community, along with alternative designs;
3. Direct the developer to propose a building that is appropriate for its context, in terms of the entire residential neighborhood, the commercial district and the Takoma Historic Districts;
4. Direct the developer to provide a parking study and analysis for the Metro station, discuss the parameters and goals with the community, to include an analysis of how the current parking is used, capacity on streets as well as other nearby parking facilities, current peak usage, and future demand, including an analysis of the impact of other area apartment buildings currently under construction or in the planning stages. The study should also provide an analysis of the impacts of parking on the size and cost of the building, including the impact on building design and overall size of placing all of the parking (residential and WMATA) in a structure or underground.
5. Ensure that the changes recommended by the Traffic Analysis can be implemented, and communicate the importance of the traffic impacts and the need for traffic mitigation to DDOT; and
6. Require a thorough CPTED (Crime Prevention through Environmental Design) analysis, with input from the community as well as the police departments from Maryland and the District of Columbia, and implementation of the CPTED recommendations.
7. Direct WMATA staff and the developer to provide the entire open green space along Carroll and Cedar Streets as a park in perpetuity and provide a green buffer in perpetuity adjoining the apartments on Eastern Avenue.
8. Direct WMATA staff and the developer to provide accurate descriptions of the amount and location of existing and proposed green space and to adopt a green space management plan that includes a tree protection

plan. The tree protection plan should include a survey of existing trees and replacement trees of comparable number, species, and sizes.

Very truly yours,

Sara Green, on behalf of  
DC MD Neighbors for Takoma Transit

Jacqueline Davison  
Sabrina Eaton  
Pamela Ellison  
Peter Feiden  
Linda Gray  
Faroll Hamer  
Sara K. Hayden  
Peter Kovar  
Lorraine Pearsall  
Joseph Radzievich  
Faith Wheeler

## writtentestimony

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**From:** Jessie Carpenter <JessieC@takomaparkmd.gov>  
**Sent:** Thursday, February 26, 2015 6:59 PM  
**To:** writtentestimony  
**Subject:** Comments on Takoma Public Hearing Staff Report (R 14-01)  
**Attachments:** Takoma-Metro-Public Hearing Staff Report Comments (City of Takoma Park).pdf

Please find attached Resolution 2015-11, Commenting on the Draft Public Hearing Staff Report, R14-01: Proposed Changes to WMATA Facilities at Takoma Metro Station; June 18, 2014. The Takoma Park City Council adopted the resolution on February 23, 2015.

Respectfully,

Jessie Carpenter

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Jessie Carpenter, CMC  
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Introduced by: Councilmember Grimes

**CITY OF TAKOMA PARK, MARYLAND**

**RESOLUTION 2015-11**

**RESOLUTION COMMENTING ON THE DRAFT PUBLIC HEARING STAFF REPORT, R14-01: PROPOSED CHANGES TO WMATA FACILITIES AT TAKOMA METRO STATION; JUNE 18, 2014**

**WHEREAS,** the City of Takoma Park deeply values the access to multi-modal transit options provided at the Takoma Metro station by the Washington Metropolitan Area Transit Authority (WMATA), the District of Columbia government, and Montgomery County; and

**WHEREAS,** WMATA Board Resolution 2014-11, adopted on March 27, 2014, approved an amended and restated Takoma joint development agreement with TM Associates LLC, an affiliate of developer EYA, and directed that the WMATA general manager convene a public hearing on the proposed development, which includes construction of a residential apartment building at the Takoma Metro site; and

**WHEREAS,** WMATA Board Resolution 2014-11 directed that “WMATA staff shall negotiate with TM Associates LLC, to minimize the number of the project’s residential parking spaces in order to promote greater transit utilization by residents and reduce traffic impact”; and

**WHEREAS,** WMATA conducted a Compact Public Hearing on Proposed Changes to WMATA Facilities at Takoma Metro Station on June 18, 2014, with docket number R14-01, and recently released a draft staff report, with exhibits, on the compact hearing; and

**WHEREAS,** in accordance with WMATA Board Resolution 2014-11, WMATA has invited submission of comments on the draft staff report by March 2, 2015; and

**WHEREAS,** the City of Takoma Park supports transit-oriented development regionally and in our own community and is concerned that the proposed Takoma Metro development enhance transit access, walkability, and bikeability; that it be compatible with the surrounding neighborhood, which includes single-family homes directly across Eastern Avenue NW from the development site and low-rise apartment buildings on Eastern Avenue adjacent to the site; that it conform to Washington D.C.’s Takoma Park Historic District requirements; and that traffic impact, which will affect Metrobus and Ride On bus service and Metropolitan Branch Trail bicyclist users, be minimal; and


- WHEREAS,** developer EYA’s current building and site designs are documented in an exhibit to the compact hearing staff report, “Exhibit H. Revised Site Concept Plan dated January 16, 2015 (with Building Site, Ground Floor Plan, Sections)”; and
- WHEREAS,** developer EYA’s current building design far exceeds the forty (40) foot maximum building height allowed by the R-5-A zoning of the portion of the parcel fronting Eastern Avenue, NW and the fifty (50) foot maximum building height allowed by the C-2-A zoning of the portion of the parcel closer to the railroad right of way. While a Planned Unit Development (PUD) process could allow deviation from current zoning, neighborhood compatibility suggests that the building height should comply with zoning limits, with the step-up to more than three stories of the building set back to the boundary of the C-2-A zone; and
- WHEREAS,** the District zoning revision regulations would lower the minimum parking ratio for the Takoma Metro site to 1-to-6 (.17), with further reduction allowed via the PUD process, however, the proposed .61 parking ratio, over three times the District’s revised zoning’s minimum, indicates that developer EYA has not answered the WMATA Board’s direction that staff and the developer “minimize the number of the project’s residential parking spaces in order to promote greater transit utilization by residents and reduce traffic impact”; and
- WHEREAS,** the over-provision of residential parking, located in an above-ground structure, leads to overly large building that could be reduced in size if residential parking were located under the building, below ground. Every other recent Takoma-area, multi-story residential building – Cedar Crossing, Elevation 314, the Gables, and Takoma Central – locates its residential parking under the building; and
- WHEREAS,** the design preserves only a partial, thirty-foot width of the wooded green space located to the immediate northwest of the building site, providing only a modest buffer between the station’s and residential building’s service lanes and the adjacent property; and
- WHEREAS,** green space on the property is a valued amenity and should be recorded as a permanent park of approximately the same size as the existing green space; and it is important that the green space be attractive and usable.
- NOW, THEREFORE, BE IT RESOLVED THAT** the City of Takoma Park submits detailed comment on the draft Public Hearing Staff Report, R14-01, as attached, recognizing positive elements in the evolution of the proposed site design.

**BE IT FURTHER RESOLVED THAT** the City asks WMATA and developer EYA to modify the design associated with the Takoma Amended Joint Development Agreement, to fully address concerns expressed here and in the City's comment, about neighborhood compatibility (massing on, and step-back from, Eastern Avenue NW; building height within current zoning limits; and adequate buffer from neighboring building); and traffic and transit-use impact (number of residential parking spaces), prior to the WMATA Board's vote on Public Hearing Staff Report, R14-01.

**BE IT FURTHER RESOLVED THAT** the City shall inform the Maryland Secretary of Transportation, the Montgomery County Executive, and the Montgomery County Council of the City's comment to WMATA concerning the draft Public Hearing Staff Report, R14-01.

Adopted this 23th day of February, 2015.

Attest:

  
Jessie Carpenter, CMC  
City Clerk

## CITY OF TAKOMA PARK, MARYLAND

### Comment on the WMATA Draft Public Hearing Staff Report, R14-01: Proposed Changes to WMATA Facilities at Takoma Metro Station

The WMATA Public Hearing Staff Report contains a review of the June 14, 2014, public hearing and staff recommendations. The City of Takoma Park respectfully submits the following comments, with requested actions.

#### Significant Traffic Analysis Limitations

The report states, on page 6, "A detailed traffic analysis for the proposed Takoma joint development project was conducted by WMATA's engineering consultant in the fall of 2013 (Traffic Analysis). The full Traffic Analysis was provided in the docket for the Public Hearing. A copy of the Traffic Analysis is included in the Environmental Evaluation attached to this report as Exhibit L. The Traffic Analysis assessed the expected impact of the proposed development on the Kiss & Ride lot, bus operations, and surrounding streets. The Traffic Analysis concluded that the proposed development will add only 44 and 54 vehicles, respectively, to traffic on Eastern Avenue in the morning and evening peak hour periods, a negligible addition to existing and projected traffic."

Page 14 reports as a "primary concern" expressed at the hearing, that the traffic analysis "did not take into account traffic to be generated by all future development in the area including new development currently under construction." The staff report offers by way of excuse, "the Traffic Analysis forecasted future traffic using the Metropolitan Washington Council of Government (MWCOC) 2.3 model and includes approved development projects reflected in the Round 8.1 Cooperative Land Use forecasts (July 2012)."

#### City comment:

We reiterate that it appears that the analysis did NOT account for under-construction, approved, planned, or anticipated residential construction in close proximity to the Takoma Metro site, which will affect both scenarios. We have reviewed the MWCOC's Round 8.1 forecasts and find no documentation that Takoma projects were included. These projects include the now-completed Takoma Central building one block from the Metro station (150 units); the now-under-construction Metro-Village development (<http://metro-village.org/>, the Keystar Spring Place development) off Blair Road NW (40-45 units); and the Douglas Development buildings bounded by Willow and Maple Streets NW in Washington DC (99 units). Another project is in planning stages nearby: Takoma Junction development (new retail and up to 25 residential units).

**While the 2013 Traffic Analysis was flawed, the City continues to advocate as the best means of ensuring "a negligible addition to existing and projected traffic," the severe reduction (or elimination) of the residential parking component of the planned development.**

#### Flawed Mode-Share Estimates

The Environmental Assessment states, on page 20 of 29: "The Traffic Analysis study investigated the existing 2020 No-Build and 2020 Build traffic conditions at the Takoma Metro Station." And page 13 of the Traffic Analysis states, "For residential trips, [a] 2005

Survey investigates the mode share for residential sites within ¼ mile walking distance at a variety of Metro stations. The average mode share at these Metro stations is listed as follows: • 11% walk/bike trips • 48% transit trips • 41% vehicle trips. This study assumes the same mode share to estimate the vehicular trips at the Takoma Metro Station."

City comment:

The mode-share assumption is questionable. The Takoma Metro station draws from a much larger area. A quarter-mile radius doesn't touch Maryland Route 410 (Philadelphia Avenue), and certainly does not include many individuals who travel to and from the Takoma Station on foot or bicycle or the majority who access the station by bus.

#### Residential Parking Oversupply

In support of the previous comment, regarding the 2013 Traffic Analysis and the impact of residential parking, the City notes that WMATA Board Resolution 2014-11, adopted on March 27, 2014, directed that "WMATA staff shall negotiate with TM Associates LLC, to minimize the number of the project's residential parking spaces in order to promote greater transit utilization by residents and reduce traffic impact."

City comment:

The City of Takoma Park agrees. **Minimal residential parking would lead to a smaller building, lower construction costs for developer EYA, allowing more-affordable rents, and creating less traffic impact, all without reducing the number of residential apartments. WMATA would realize greater transit-user revenue from the residents.**

The jurisdiction that houses the Takoma Metro station also agrees, in principle. While the Washington D.C. Office of Planning withdrew its 2013 proposal to completely eliminate minimum parking requirements in transit zones, the District zoning revision regulations would lower the minimum parking ratio for the Takoma Metro site to 1-to-6 (.17), with further reduction allowed via the Planned Unit Development (PUD) process.

Yet the current building design includes four levels of residential parking with an estimated 121 residential parking spaces for an apartment complex of approximately 185-195 units. A **.61 parking ratio, over three times the District's revised zoning's minimum, indicates that developer EYA has not answered the WMATA Board's direction that staff and the developer "minimize the number of the project's residential parking spaces in order to promote greater transit utilization by residents and reduce traffic impact."**

**We reiterate our call for the severe reduction of the residential parking component of the planned development, supported by WMATA Board Resolution 2014-11 and by the principles of Washington DC's zoning revision.**

#### Misrepresentation of Existing Takoma Metro Site Park Land

Page 27 of 29 of the Environmental Evaluation states, "No park is located on-site. No impact is projected."

And page 16 of staff report includes, "WMATA intends to dedicate one acre of the open space area as a village green for community use and anticipates that Takoma's creative community members will use it."

City comment:

Neither Environmental Evaluation statement is correct. They rely on a specious distinction between the Takoma Metro site's lawn areas with many trees and a park.

The Takoma Metro site includes two substantial, separated green-space areas that a reasonable person would term parklands. The proposed development would moderately reduce the larger of the park areas, by creating new bus facilities and a formal park *that the community has not asked for* and by reserving additional current park space for future transit use. Further, the proposed development would reduce by an estimated 40% a wooded area between the proposed development and an adjacent property.

**The City does not object to using some of the current park space for bus bays and layover space. We otherwise seek green-space preservation, as-is, of both the wooded area between the proposed building and adjacent apartments and the larger grassy expanse, in order to achieve minimal impact on the current park space.**

#### Bicycle Facilities, Metropolitan Branch Trail

Report page 5 states, "The proposed plan shown at the Public Hearing also has a new Bike & Ride facility for 105 bikes that will be installed by WMATA in 2016 at the station's escalator entrance." Page 7 states, "Space is provided for a ten-foot Metropolitan Branch Trail [(MBT)] for cyclists and a separate five-foot sidewalk for pedestrians in the 30-foot setback between the proposed building façade and the Eastern Avenue curb line."

City comment:

**The City commends WMATA's inclusion of expanded bicycle facilities in the development plan. We commend developer EYA's and WMATA's increase in the building setback and their addressing needed expansion of the MBT, which currently ends in Takoma Park at the Washington DC border near the Takoma Metro site, an essential part of our region's bike network.**

#### Access Lanes

Report page 7 states, "The entry drive to the WMATA Kiss & Ride facility, residential drop off area, residential parking, and the loading dock has been reduced to two lanes, which are wide enough to accommodate truck access and circulation," and further, "A buffer of 30 feet is provided between the entry drive and the property line on the northwest corner of the site." The access lanes are addressed on page 18 of the staff report.

City comment:

**The City appreciates the access-lane reduction and the associated reduction in the amount of wooded (park) space to be taken for the access lane and observes that the access lanes could be eliminated, were the building's residential parking placed under the building. We note that every multi-unit residential development in the Takoma Metro area in recent years - Cedar Crossing, Elevation 314, the Gables, Takoma Central - locates its parking under the building.**

**Coupled with a reduction in the number of residential parking space, placing those spaces underground would allow the decrease in building size sought by community advocates without reducing the number of residential apartment units.**

Loading Dock Safety

Page 7 includes the statement, “The loading dock has been lengthened to accommodate 30-foot vehicles and will have a transparent wall to the south so that pedestrians on the sidewalk in the garage can safely approach the loading dock exit.” The loading dock relocation is further described on pages 17-18 of the report.

City comment:

The repositioning of the loading dock, so that trucks will no longer back across the Eastern Avenue NW sidewalk, is a positive development. Yet the new loading dock position will still force trucks to block the lanes used by vehicle’s to access the site’s transit-user and residential parking, and to back across a pedestrian path used by transit-users accessing the Takoma Metro station.

**Positioning the loading dock under the building, with sufficient underbuilding space to allow truck turn-around, would eliminate the loading-dock safety threat.**

Neighborhood Design Working Group

Staff report page 10 responds to the testimony of Montgomery County Councilmember Marc Elrich, Maryland Senator Jamie Raskin, and Maryland Delegates Sheila Hixson, Tom Hucker, and Heather Mizeur as follows: “With regard to establishment of a neighborhood design working group, Board Resolution 2014-11 states: ‘...WMATA will receive public comment on matters regarding residential building design elements during the second Public hearing. WMATA staff shall report such comments in the staff report on the Public hearing and forward those comments to the District of Columbia Zoning Commission[.]’”

City comment:

**Staff’s response is evasive. The public officials were aware of WMATA’s process: They were participating in it. The City asks that the representatives’ request be forthrightly and directly answered, either by creation of the requested neighborhood design working group or by provision of a well-reasoned Board explanation.**

Building Design

Staff report pages 19-20 summarize the widespread discount with the proposed building design: “Of the 60 speakers testifying at the Public Hearing, ... some 46 speakers expressed reservations about the proposed structure. In testimony submitted after the Public Hearing about the same ratio of writers expressed concerns about or support of the proposal. A petition was also submitted expressing dissatisfaction with the building design; it was signed by some 216 people, many of whom otherwise wrote or spoke for the Public Hearing record; a second petition signed by some 75 people also addressed building design.”

City comment:

Given our long series of community interactions regarding Takoma Metro development, we

believe the building design revisions made since the June, 2014 public hearing will not satisfy the vast majority of concerns already expressed to WMATA. WMATA exists to serve the public. The Board must seriously consider and respond to public concerns, whether expressed directly or via constituent jurisdictions that include the City of Takoma Park, representing Takoma Metro transit users and nearby neighbors.

**The City asks WMATA and developer EYA to modify the design associated with the Takoma Amended Joint Development Agreement, to fully address concerns expressed in council resolutions and in this comment, about neighborhood compatibility (massing on, and step-back from, Eastern Avenue NW; building height within current zoning limits; and adequate buffer from neighboring building); and traffic and transit-use impact (number of residential parking spaces), prior to the WMATA Board's vote on Public Hearing Staff Report, R14-01.**



writtentestimony

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**From:** Ellen Cassedy <ellen@ellencassedy.com>  
**Sent:** Sunday, March 01, 2015 1:11 PM  
**To:** writtentestimony  
**Subject:** Re: Docket No. R14-01: Proposed Changes to WMATA Facilities at Takoma Metro Station

Ellen Cassedy  
7310 Cedar Avenue  
Takoma Park, MD 20912  
301-565-0006  
[ellen@ellencassedy.com](mailto:ellen@ellencassedy.com)

March 1, 2015

WMATA Board Members  
Office of the Secretary  
Washington Metropolitan Area Transit Authority  
600 Fifth Street, NW  
Washington, DC 20001

**Re: Docket No. R14-01:**  
Proposed Changes to WMATA Facilities at Takoma Metro Station

Dear WMATA Board Members:

Consistent with my hearing testimony on this issue in the past, I would like to bring to your attention my support for the appended letter from DC-MD Neighbors for Takoma Transit. I live close to the proposed development. I am a longterm resident of the community. I use Metro regularly and am in full support of public transit. I park regularly in the Metro lot.

I have been deeply surprised by how both the developer and the Board – both seemingly well-meaning entities – have seemed willing to bypass the stated concerns of neighbors of the proposed development. I hope those concerns will be listened to now.

Thank you for your attention.

Sincerely,

Ellen Cassedy

**DC-MD Neighbors for Takoma Transit**  
February 23, 2015

WMATA Board Members  
Office of the Secretary  
Washington Metropolitan Area Transit Authority  
600 Fifth Street, NW  
Washington, DC 20001

**Re: Docket No. R14-01:**  
Proposed Changes to WMATA Facilities at Takoma Metro Station

Dear WMATA Board Members:

We are writing as members of DC-Maryland Neighbors for Takoma Transit, a group of neighbors who live in the Washington, DC and Maryland neighborhoods near the Takoma Metro Station joint development site that is the subject of this hearing.

We support a multifamily building at this location. We like the idea of replacing the large existing surface parking lot with a project that will provide housing for new members of our neighborhood that we love so much. We especially support keeping the green space at Cedar and Carroll Streets as a permanent public park and the green space adjoining the garden apartments on Eastern Avenue as a permanent green buffer. We believe a well thought-out, properly designed project can provide additional housing units, strengthen the neighborhood and the local economy, and improve access to transit.

**WE HAVE RESERVATIONS ABOUT THE CURRENT DESIGN**

We have serious reservations about the scale of the proposed building, and especially the height, setbacks, buffer and massing, in relationship to the existing buildings in the residential neighborhood as well as the buildings along the commercial streets. We also have reservations about the amount and location of both the public WMATA parking and the private residential parking. **Because of these reservations, as described in more detail below, we urge the WMATA Board to postpone a final vote on the Compact Hearing report to allow for a continuation of the promising discussions that have begun to take place between the community and the developer, and to include certain conditions relating to design as part of the final vote.**

**PODIUM PARKING AND WMATA PROCESS**

It is clear that the proposed location of the transit elements and the transit parking dictate, to a large extent, the building design and massing, and cannot be evaluated independently. The WMATA staff report states, *"Staff believes that the proposed transit facilities can be evaluated independently of aspects of building design that do not physically intersect with those facilities."* However, the proposed parking lot DOES physically intersect with the building. The layout of this fully one-acre surface lot dominates the site and gives prominence to cars over all other modes of access. The parking structure is not a garage. There are no walls. This is an open surface parking lot that covers about two-thirds of the site, and it is underneath a podium-style building that sits on top of the parking lot. Only the front portion of the building along Eastern Avenue is built to the ground. Most of the first floor of the building has no sides, and the drive aisle for the parking lot is outside of the upper stories of the building wall, making screening ineffective. Many podium buildings similar to this were built in the 1970s and 80s as part of Urban Renewal programs, but this style has gone out of favor ever since New Urbanism recognized the importance of the traditional urban form in creating desirable neighborhoods.

The classic urban form is a building with a base, middle and top. This form is the key to the pedestrian experience. The base is most important, and it should be activated through entrances, windows, or stoops and porches. Activating this edge of the building, where so many pedestrians and bus riders will walk and wait, is critical. The bus loop and sidewalk along this edge of the building function as a public street, just as much as Eastern Avenue, and like Eastern Avenue it will be perceived as the frontage for the building. It will also be highly visible from Cedar and Carroll Streets, through the park. It would be desirable to have an attractive building façade along the length of this “street,” punctuated by some ground level open space, not a view of cars, paving, bright security lights and potentially worrisome hiding places in the shadows created by pillars and cars.

## WE ARE DISAPPOINTED IN THE LACK OF CONTEXT SHOWN IN CURRENT PLANS

We acknowledge that the developer has made some meaningful changes that begin to address the community’s concerns, as demonstrated in Exhibit H. However, we are disappointed that the developer has still not provided any contextual information. This is a big site – it is the full size of a typical Takoma Park block – and it’s a big building. It’s nearly 400 feet long and varies from 160 to 230 feet wide. (In comparison, the nearby Gables multi-family development is 275 feet long and 175 feet wide.) The Takoma Metro development is currently planned to be four stories high in the front (45’8”) rising to over 75 feet in the back. Welcoming a project of this magnitude into a single-family neighborhood would be a huge challenge. Getting it to a more manageable size is critical, but it is not possible to determine the appropriate setbacks, buffers, or building height and massing without information about the context of the project. Smart growth is not just about locating density at transit hubs. It’s about recognizing and respecting the context of what’s already there and providing an organic transition between the old and the new in order to create a great livable urban neighborhood.

The context should recognize, enhance and be compatible with:

- The historic houses directly across the street, and the historic neighborhood that unfolds around them
- The garden-style apartments adjoining the north boundary
- The views from Cedar Street and Carroll Street across the park
- The historic town center of which this is an extension
- The elevated metro tracks
- The topography of the site, which exists in a bowl
- The green space and tree canopies in the green space along Cedar Street and at the garden apartments on Eastern Avenue

As stated above, the developer has made several positive changes regarding the setbacks and height (along the garden apartments a partial 30-foot buffer and a 68-foot building setback is now proposed; along Eastern Avenue there would be a 30-foot setback, and the height steps back from 45 feet 8 inches along Eastern Avenue to 76 feet at the back of the site). Because the site is in a bowl, in order to determine the extent to which further changes are needed, it is vital that contextual information be provided. Arriving at an opinion on additional changes that would be needed to make the project compatible with the surrounding neighborhood -- especially in terms of height, massing and setback -- without that information would be irresponsible.

One opportunity to reduce scale that should be explored further is placing the WMATA parking either in a structure or underground, and placing the residential parking underground. Both of these solutions would substantially decrease the overall size of the building. Underground parking, which has been constructed for all the recently built area apartment buildings, is preferable, as it provides for the

maximum amount of space for people and open space at the ground level. But, even structured parking is superior to the surface parking that is proposed under the building.

## GREEN SPACE

Another unresolved issue that has a direct bearing on the WMATA Board's decision is the amount of proposed green space. While it has been stated by WMATA that there will be a one-acre park along Cedar and Carroll Street, many in the community have understood that the entire area as it is now would become the park in perpetuity. According to WMATA staff, fully one-third of that site will be reserved by WMATA for future operations and will not be part of the park. Unfortunately, the EYA drawings seen by many in the community did not show the boundary of that park, and WMATA staff has not clearly justified the need for future facilities expansion.

The second green space area that is unresolved is the green buffer adjoining the apartments on Eastern Avenue. While the developer is providing a partial 30 foot buffer, this is only for a portion of the buffer and it decreases to zero feet where the drive aisle abuts the property line. We are very concerned about the significant loss of trees and diminished square footage as it is currently proposed. The developer should provide a detailed plan for this green space, including precise size measurements, a tree protection and replacement plan, and permanent protection for the proposed buffer. In addition, the developer should explore ways to improve the site design that could lead to a larger green space buffer along this property line.

## POSTPONE YOUR DECISION -- IT'S REASONABLE

As noted above, the transit components of this project cannot be completely separated from the design components, and we therefore believe the WMATA facilities should not be approved until there is further opportunity for the community to discuss the proposed design with the developer. Accordingly, we urge the WMATA Board to hold off on a final vote on the Compact Hearing report to allow those discussions to continue. However, regardless of when the Board votes on the Compact Hearing report, we believe that it is crucial to include some conditions in that approval as stated below. Furthermore, we wish to make it clear that we will not hesitate to put these transit issues and their impacts on the table as part of future entitlement processes, including zoning and historic preservation.

We do not wish to create demands that prevent a project from going forward at the site. Asking for the WMATA parking to be in a structure is not unreasonable, as there are examples all over the region at other Metro stations. Asking the developer to place the residential parking underground is not unreasonable, as there are several recent examples in Takoma Park. The WMATA surface parking could also be screened with liner units, for which there are many precedents, or placed underground. The Kiss & Ride and disabled entrances, and other spaces geared towards proximity to the elevator could remain in a much smaller surface lot. A possible reduction in the number of transit user spaces should also be explored, as the proposed number of spaces does not appear to have a basis that is supported through analysis and policy.

## NEED FOR A PARKING STUDY

It should be acknowledged that parking is a major concern for many neighbors and visitors to the commercial district. Planners understand that there is often a gap between the amount of perceived and actual parking. The only way to counter this misperception is through a parking study and analysis, which would measure the actual capacity of the streets and parking lots surrounding the Metro station and compare it to the peak hour usage and anticipated demand. It should also take into account the point

that an assessment of commuter parking needs, based primarily on current usage rates, is not a reliable approach, given the unusual parking restrictions currently in place there.

We should not be building more parking until we have used what we already have. Overbuilding parking is a scourge both in terms of cost to the developers (that money could have been spent on neighborhood benefits or higher quality architecture) and the neighborhood (in terms of having to live with a much larger building). It is important to explore the possibility of reducing the amount of parking on the site, or locating the parking underground, in order to achieve a smaller building, potentially with less living space or without reducing the living space.

## TRAFFIC CONCERNS

Traffic impacts on the neighborhood are still a concern for the community. We note the traffic study done by WMATA recommends several changes to improve traffic flow, such as signal optimization and lane configuration on Carroll Street and Piney Branch Road. While we understand that these changes are under the purview of DDOT, not WMATA, and that the traffic impacts will be reviewed as part of the rezoning process, we would like to explore these options further at the earliest opportunity.

## PUBLIC SAFETY

Public safety is a key issue for the neighborhood, especially in and around the surface parking lot. There is a highly regarded tool called CPTED (Crime Prevention Through Environmental Design) that relies on a variety of physical design techniques, such as natural surveillance or “eyes on the street,” to deter potential criminal actions. While the WMATA staff have indicated that there will be lighting, column spacing and signage in the parking lot intended to address public safety, the techniques used by CPTED are also necessary to make pedestrians feel safer. Implementing CPTED typically reduces the overall costs of preventing crime, and is much more effective when implemented as part of the design process rather than retrofitted. We believe that a CPTED analysis of the WMATA facilities, especially the parking lot, should be conducted and should include input from the community and police departments from both the District and Maryland.

## WMATA BOARD ACTION AND CONDITIONS

Again, we urge the WMATA Board to postpone approval of this project to allow further discussions on design and related issues involving the developer and the community. More specifically, we request the WMATA Board to attach the following conditions to any approval of this project:

1. Direct WMATA staff to create a neighborhood advisory committee to provide comments on the design, parking issues, and other neighborhood impacts, as well as potential benefits and amenities; include WMATA representatives, developers, Office of Planning staff, and near-in, directly impacted neighbors from both Maryland and the District of Columbia.
2. Direct the developer to provide appropriate contextual drawings, sections, elevations and three-dimensional models to the community, along with alternative designs;
3. Direct the developer to propose a building that is appropriate for its context, in terms of the entire residential neighborhood, the commercial district and the Takoma Historic Districts;

4. Direct the developer to provide a parking study and analysis for the Metro station, discuss the parameters and goals with the community, to include an analysis of how the current parking is used, capacity on streets as well as other nearby parking facilities, current peak usage, and future demand, including an analysis of the impact of other area apartment buildings currently under construction or in the planning stages. The study should also provide an analysis of the impacts of parking on the size and cost of the building, including the impact on building design and overall size of placing all of the parking (residential and WMATA) in a structure or underground.
5. Ensure that the changes recommended by the Traffic Analysis can be implemented, and communicate the importance of the traffic impacts and the need for traffic mitigation to DDOT; and
6. Require a thorough CPTED (Crime Prevention through Environmental Design) analysis, with input from the community as well as the police departments from Maryland and the District of Columbia, and implementation of the CPTED recommendations.
7. Direct WMATA staff and the developer to provide the entire open green space along Carroll and Cedar Streets as a park in perpetuity and provide a green buffer in perpetuity adjoining the apartments on Eastern Avenue.
8. Direct WMATA staff and the developer to provide accurate descriptions of the amount and location of existing and proposed green space and to adopt a green space management plan that includes a tree protection plan. The tree protection plan should include a survey of existing trees and replacement trees of comparable number, species, and sizes.

Very truly yours,

Sara Green, on behalf of  
DC MD Neighbors for Takoma Transit

Jacqueline Davison  
Sabrina Eaton  
Pamela Ellison  
Peter Feiden  
Linda Gray  
Faroll Hamer  
Sara K. Hayden  
Peter Kovar  
Lorraine Pearsall  
Joseph Radzievich  
Faith Wheeler



## writtentestimony

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**From:** Lea Chartock <xwriter@umd.edu>  
**Sent:** Thursday, February 26, 2015 10:34 AM  
**To:** writtentestimony  
**Subject:** Proposed Changes to WMATA Facilities at Takoma Metro Station

### **Re: Docket No. R14-01**

Dear WMATA Board Members:

I am writing as Takoma Park, Maryland resident. I believe that a well thought-out, properly designed project on the Takoma metro station site can not only provide additional housing units but strengthen the local economy and improve access to transit.

**However**, the scale of the building as currently proposed--the height, setbacks, buffer and massing in relationship to the existing residential neighborhood--is a serious concern, as is the amount and location of both the public WMATA parking and the private residential parking.

**Because of these reservations, I strongly urge the WMATA Board to postpone a final vote on the Compact Hearing report to allow for a continuation of the discussions that have begun to take place between the community and the developer, and to include certain conditions relating to design (described below) as part of the final vote.**

1. Direct WMATA staff to create a neighborhood advisory committee to provide comments on the design, parking issues, and other neighborhood impacts, as well as potential benefits and amenities; include WMATA representatives, developers, Office of Planning staff, and near-in, directly impacted neighbors from both Maryland and the District of Columbia.
2. Direct the developer to provide appropriate contextual drawings, sections, elevations and three-dimensional models to the community, along with alternative designs;
3. Direct the developer to propose a building that is appropriate for its context, in terms of the entire residential neighborhood, the commercial district and the Takoma Historic Districts;
4. Direct the developer to provide a parking study that includes an analysis of how the current parking is used, capacity on streets as well as other nearby parking facilities, current peak usage, and future demand, including an analysis of the impact of other area apartment buildings currently under construction or in the planning stages. The study should also analyze the impacts of parking on the size and cost of the building, including the impact on building design and overall size of placing all of the parking (residential and WMATA) in a structure or underground.
5. Ensure that the changes recommended by the Traffic Analysis can be implemented, and communicate the importance of the traffic impacts and the need for traffic mitigation to DDOT; and
6. Require a thorough CPTED (Crime Prevention through Environmental Design) analysis, with input from the community as well as the police departments from Maryland and the District of Columbia, and implementation of the CPTED recommendations.
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8. Direct WMATA staff and the developer to provide accurate descriptions of the amount and location of existing and proposed green space and to adopt a green space management plan that includes a tree protection plan. The tree protection plan should include a survey of existing trees and replacement trees of comparable number, species, and sizes.

Thank you very much for your attention.





## writtentestimony

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**From:** Sabrina Eaton <sabrinaeaton@gmail.com>  
**Sent:** Sunday, March 01, 2015 6:11 PM  
**To:** writtentestimony  
**Subject:** Comment on docket R14-01

Greetings. This is Sabrina Eaton who lives across from the Takoma Metro station at 7019 Eastern Avenue in Takoma Park. Thank you for giving me the opportunity to comment on the proposed development your organization would like to build directly across the street from my house. Below are comments on your proposal from me and a group of other DC and Maryland residents I am working with.

WMATA Board Members  
Office of the Secretary  
Washington Metropolitan Area Transit Authority  
600 Fifth Street, NW  
Washington, DC 20001

### **Re: Docket No. R14-01:**

Proposed Changes to WMATA Facilities at Takoma Metro Station

Dear WMATA Board Members:

We are writing as members of DC-Maryland Neighbors for Takoma Transit, a group of neighbors who live in the Washington, DC and Maryland neighborhoods near the Takoma Metro Station joint development site that is the subject of this hearing.

We support a multifamily building at this location. We like the idea of replacing the large existing surface parking lot with a project that will provide housing for new members of our neighborhood that we love so much. We especially support keeping the green space at Cedar and Carroll Streets as a permanent public park and the green space adjoining the garden apartments on Eastern Avenue as a permanent green buffer. We believe a well thought-out, properly designed project can provide additional housing units, strengthen the neighborhood and the local economy, and improve access to transit.

**WE HAVE RESERVATIONS ABOUT THE CURRENT DESIGN**

We have serious reservations about the scale of the proposed building, and especially the height, setbacks, buffer and massing, in relationship to the existing buildings in the residential neighborhood as well as the buildings along the commercial streets. We also have reservations about the amount and location of both the public WMATA parking and the private residential parking. **Because of these reservations, as described in more detail below, we urge the WMATA Board to postpone a final vote on the Compact Hearing report to allow for a continuation of the promising discussions that have begun to take place between the community and the developer, and to include certain conditions relating to design as part of the final vote.**

**PODIUM PARKING AND WMATA PROCESS**

It is clear that the proposed location of the transit elements and the transit parking dictate, to a large extent, the building design and massing, and cannot be evaluated independently. The WMATA staff report states, *"Staff believes that the proposed transit facilities can be evaluated independently of aspects of building design that do not physically intersect with those facilities."* However, the proposed parking lot DOES physically intersect with the building. The layout of this fully one-acre surface lot dominates the site and gives prominence to cars over all other modes of access. The parking structure is not a garage. There are no walls. This is an open surface parking lot that covers about two-thirds of the site, and it is underneath a podium-style building that sits on top of the parking lot. Only the front portion of the building along Eastern Avenue is built to the ground. Most of the first floor of the building has no sides, and the drive aisle for the parking lot is outside of the upper stories of the building wall, making screening ineffective. Many podium buildings similar to this were built in the 1970s and 80s as part of Urban

Renewal programs, but this style has gone out of favor ever since New Urbanism recognized the importance of the traditional urban form in creating desirable neighborhoods.

The classic urban form is a building with a base, middle and top. This form is the key to the pedestrian experience. The base is most important, and it should be activated through entrances, windows, or stoops and porches. Activating this edge of the building, where so many pedestrians and bus riders will walk and wait, is critical. The bus loop and sidewalk along this edge of the building function as a public street, just as much as Eastern Avenue, and like Eastern Avenue it will be perceived as the frontage for the building. It will also be highly visible from Cedar and Carroll Streets, through the park. It would be desirable to have an attractive building façade along the length of this “street,” punctuated by some ground level open space, not a view of cars, paving, bright security lights and potentially worrisome hiding places in the shadows created by pillars and cars.

#### WE ARE DISAPPOINTED IN THE LACK OF CONTEXT SHOWN IN CURRENT PLANS

We acknowledge that the developer has made some meaningful changes that begin to address the community’s concerns, as demonstrated in Exhibit H. However, we are disappointed that the developer has still not provided any contextual information. This is a big site – it is the full size of a typical Takoma Park block – and it’s a big building. It’s nearly 400 feet long and varies from 160 to 230 feet wide. (In comparison, the nearby Gables multi-family development is 275 feet long and 175 feet wide.) The Takoma Metro development is currently planned to be four stories high in the front (45’8”) rising to over 75 feet in the back. Welcoming a project of this magnitude into a single-family neighborhood would be a huge challenge. Getting it to a more manageable size is critical, but it is not possible to determine the appropriate setbacks, buffers, or building height and massing without information about the context of the project. Smart growth is not just about locating density at transit hubs. It’s about recognizing and respecting the context of what’s already there and providing an organic transition between the old and the new in order to create a great livable urban neighborhood.

The context should recognize, enhance and be compatible with:

- The historic houses directly across the street, and the historic neighborhood that unfolds around them
- The garden-style apartments adjoining the north boundary
- The views from Cedar Street and Carroll Street across the park
- The historic town center of which this is an extension
- The elevated metro tracks
- The topography of the site, which exists in a bowl
- The green space and tree canopies in the green space along Cedar Street and at the garden apartments on Eastern Avenue

As stated above, the developer has made several positive changes regarding the setbacks and height (along the garden apartments a partial 30-foot buffer and a 68-foot building setback is now proposed; along Eastern Avenue there would be a 30-foot setback, and the height steps back from 45 feet 8 inches along Eastern Avenue to 76 feet at the back of the site). Because the site is in a bowl, in order to determine the extent to which further changes are needed, it is vital that contextual information be provided. Arriving at an opinion on additional changes that would be needed to make the project compatible with the surrounding neighborhood -- especially in terms of height, massing and setback -- without that information would be irresponsible.

One opportunity to reduce scale that should be explored further is placing the WMATA parking either in a structure or underground, and placing the residential parking underground. Both of these solutions would substantially decrease the overall size of the building. Underground parking, which has been constructed for all the recently built area apartment buildings, is preferable, as it provides for the maximum amount of space for people and open space at the ground level. But, even structured parking is superior to the surface parking that is proposed under the building.

#### GREEN SPACE

Another unresolved issue that has a direct bearing on the WMATA Board’s decision is the amount of proposed green space. While it has been stated by WMATA that there will be a one-acre park along Cedar and Carroll Street, many in the community have understood that the entire area as it is now would become the park in perpetuity. According to WMATA staff, fully one-third of that site will be reserved by

WMATA for future operations and will not be part of the park. Unfortunately, the EYA drawings seen by many in the community did not show the boundary of the one-acre park, and WMATA staff has not clearly justified the need for future facilities expansion.

The second green space area that is unresolved is the green buffer adjoining the apartments on Eastern Avenue. While the developer is providing a partial 30 foot buffer, this is only for a portion of the buffer and it decreases to zero feet where the drive aisle abuts the property line. We are very concerned about the significant loss of trees and diminished square footage as it is currently proposed. The developer should provide a detailed plan for this green space, including precise size measurements, a tree protection and replacement plan, and permanent protection for the proposed buffer. In addition, the developer should explore ways to improve the site design that could lead to a larger green space buffer along this property line.

#### POSTPONE YOUR DECISION -- IT'S REASONABLE

As noted above, the transit components of this project cannot be completely separated from the design components, and we therefore believe the WMATA facilities should not be approved until there is further opportunity for the community to discuss the proposed design with the developer. Accordingly, we urge the WMATA Board to hold off on a final vote on the Compact Hearing report to allow those discussions to continue. However, regardless of when the Board votes on the Compact Hearing report, we believe that it is crucial to include some conditions in that approval as stated below. Furthermore, we wish to make it clear that we will not hesitate to put these transit issues and their impacts on the table as part of future entitlement processes, including zoning and historic preservation.

We do not wish to create demands that prevent a project from going forward at the site. [P1] Asking for the WMATA parking to be in a structure is not unreasonable, as there are examples all over the region at other Metro stations. Asking the developer to place the residential parking underground is not unreasonable, as there are several recent examples in Takoma Park. The WMATA surface parking could also be screened with liner units, for which there are many precedents, or placed underground. The Kiss & Ride and disabled entrances, and other spaces geared towards proximity to the elevator could remain in a much smaller surface lot. A possible reduction in the number of transit user spaces should also be explored, as the proposed number of spaces does not appear to have a basis that is supported through analysis and policy.

#### NEED FOR A PARKING STUDY

It should be acknowledged that parking is a major concern for many neighbors and visitors to the commercial district. Planners understand that there is often a gap between the amount of perceived and actual parking. The only way to counter this misperception is through a parking study and analysis, which would measure the actual capacity of the streets and parking lots surrounding the Metro station and compare it to the peak hour usage and anticipated demand. It should also take into account the point that an assessment of commuter parking needs, based primarily on current usage rates, is not a reliable approach, given the unusual parking restrictions currently in place there.

We should not be building more parking until we have used what we already have. Overbuilding parking is a scourge both in terms of cost to the developers (that money could have been spent on neighborhood benefits or higher quality architecture) and the neighborhood (in terms of having to live with a much larger building). It is important to explore the possibility of reducing the amount of parking on the site, or locating the parking underground, in order to achieve a smaller building, potentially with less living space or without reducing the living space.

#### TRAFFIC CONCERNS

Traffic impacts on the neighborhood are still a concern for the community. We note the traffic study done by WMATA recommends several changes to improve traffic flow, such as signal optimization and lane configuration on Carroll Street and Piney Branch Road. While we understand that these changes are under the purview of DDOT, not WMATA, and that the traffic impacts will be reviewed as part of the rezoning process, we would like to explore these options further at the earliest opportunity.

#### PUBLIC SAFETY

Public safety is a key issue for the neighborhood, especially in and around the surface parking lot. There is a highly regarded tool called CPTED (Crime Prevention Through Environmental Design) that relies on a variety of physical design techniques, such as natural surveillance or "eyes on the street," to deter

potential criminal actions. While the WMATA staff have indicated that there will be lighting, column spacing and signage in the parking lot intended to address public safety, the techniques used by CPTED are also necessary to make pedestrians feel safer. Implementing CPTED typically reduces the overall costs of preventing crime, and is much more effective when implemented as part of the design process rather than retrofitted. We believe that a CPTED analysis of the WMATA facilities, especially the parking lot, should be conducted and should include input from the community and police departments from both the District and Maryland.

#### WMATA BOARD ACTION AND CONDITIONS

Again, we urge the WMATA Board to postpone approval of this project to allow further discussions on design and related issues involving the developer and the community. More specifically, we request the WMATA Board to attach the following conditions to any approval of this project:

1. Direct WMATA staff to create a neighborhood advisory committee to provide comments on the design, parking issues, and other neighborhood impacts, as well as potential benefits and amenities; include WMATA representatives, developers, Office of Planning staff, and near-in, directly impacted neighbors from both Maryland and the District of Columbia.
2. Direct the developer to provide appropriate contextual drawings, sections, elevations and three-dimensional models to the community, along with alternative designs;
3. Direct the developer to propose a building that is appropriate for its context, in terms of the entire residential neighborhood, the commercial district and the Takoma Historic Districts;
4. Direct the developer to provide a parking study and analysis for the Metro station, discuss the parameters and goals with the community, to include an analysis of how the current parking is used, capacity on streets as well as other nearby parking facilities, current peak usage, and future demand, including an analysis of the impact of other area apartment buildings currently under construction or in the planning stages. The study should also provide an analysis of the impacts of parking on the size and cost of the building, including the impact on building design and overall size of placing all of the parking (residential and WMATA) in a structure or underground.
5. Ensure that the changes recommended by the Traffic Analysis can be implemented, and communicate the importance of the traffic impacts and the need for traffic mitigation to DDOT; and
6. Require a thorough CPTED (Crime Prevention through Environmental Design) analysis, with input from the community as well as the police departments from Maryland and the District of Columbia, and implementation of the CPTED recommendations.
7. Direct WMATA staff and the developer to provide the entire open green space along Carroll and Cedar Streets as a park in perpetuity and provide a green buffer in perpetuity adjoining the apartments on Eastern Avenue.
8. Direct WMATA staff and the developer to provide accurate descriptions of the amount and location of existing and proposed green space and to adopt a green space management plan that includes a tree protection plan. The tree protection plan should include a survey of existing trees and replacement trees of comparable number, species, and sizes.

Very truly yours,

DC MD Neighbors for Takoma Transit

## writtentestimony

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**From:** Elfring, Chris <CElfring@nas.edu>  
**Sent:** Monday, March 02, 2015 10:59 AM  
**To:** writtentestimony  
**Subject:** Comments on Takoma Metro development project  
**Attachments:** final draft of letter 9.26.2.doc

Dear Metro:

Please read this letter from the community around the Takoma metro station carefully – it is a thoughtful and constructive summary of our neighborhood’s thoughts. Scale is critical.

Regards, Chris Elfring, 7204 Holly Ave, Takoma Park, MD 20912

## DC-MD Neighbors for Takoma Transit

February 23, 2015

WMATA Board Members  
Office of the Secretary  
Washington Metropolitan Area Transit Authority  
600 Fifth Street, NW  
Washington, DC 20001

**Re: Docket No. R14-01:**

Proposed Changes to WMATA Facilities at Takoma Metro Station

Dear WMATA Board Members:

We are writing as members of DC-Maryland Neighbors for Takoma Transit, a group of neighbors who live in the Washington, DC and Maryland neighborhoods near the Takoma Metro Station joint development site that is the subject of this hearing.

We support a multifamily building at this location. We like the idea of replacing the large existing surface parking lot with a project that will provide housing for new members of our neighborhood that we love so much. We especially support keeping the green space at Cedar and Carroll Streets as a permanent public park and the green space adjoining the garden apartments on Eastern Avenue as a permanent green buffer. We believe a well thought-out, properly designed project can provide additional housing units, strengthen the neighborhood and the local economy, and improve access to transit.

### WE HAVE RESERVATIONS ABOUT THE CURRENT DESIGN

We have serious reservations about the scale of the proposed building, and especially the height, setbacks, buffer and massing, in relationship to the existing buildings in the residential neighborhood as well as the buildings along the commercial streets. We also have reservations about the amount and location of both the public WMATA parking and the private residential parking. **Because of these reservations, as described in more detail below, we urge the WMATA Board to postpone a final vote on the Compact Hearing report to allow for a continuation of the promising discussions that have begun to take place between the community and the developer, and to include certain conditions relating to design as part of the final vote.**

## PODIUM PARKING AND WMATA PROCESS

It is clear that the proposed location of the transit elements and the transit parking dictate, to a large extent, the building design and massing, and cannot be evaluated independently. The WMATA staff report states, *“Staff believes that the proposed transit facilities can be evaluated independently of aspects of building design that do not physically intersect with those facilities.”* However, the proposed parking lot DOES physically intersect with the building. The layout of this fully one-acre surface lot dominates the site and gives prominence to cars over all other modes of access. The parking structure is not a garage. There are no walls. This is an open surface parking lot that covers about two-thirds of the site, and it is underneath a podium-style building that sits on top of the parking lot. Only the front portion of the building along Eastern Avenue is built to the ground. Most of the first floor of the building has no sides, and the drive aisle for the parking lot is outside of the upper stories of the building wall, making screening ineffective. Many podium buildings similar to this were built in the 1970s and 80s as part of Urban Renewal programs, but this style has gone out of favor ever since New Urbanism recognized the importance of the traditional urban form in creating desirable neighborhoods.

The classic urban form is a building with a base, middle and top. This form is the key to the pedestrian experience. The base is most important, and it should be activated through entrances, windows, or stoops and porches. Activating this edge of the building, where so many pedestrians and bus riders will walk and wait, is critical. The bus loop and sidewalk along this edge of the building function as a public street, just as much as Eastern Avenue, and like Eastern Avenue it will be perceived as the frontage for the building. It will also be highly visible from Cedar and Carroll Streets, through the park. It would be desirable to have an attractive building façade along the length of this “street,” punctuated by some ground level open space, not a view of cars, paving, bright security lights and potentially worrisome hiding places in the shadows created by pillars and cars.

## WE ARE DISAPPOINTED IN THE LACK OF CONTEXT SHOWN IN CURRENT PLANS

We acknowledge that the developer has made some meaningful changes that begin to address the community’s concerns, as demonstrated in Exhibit H. However, we are disappointed that the developer has still not provided any contextual information. This is a big site – it is the full size of a typical Takoma Park block – and it’s a big building. It’s nearly 400 feet long and varies from 160 to 230 feet wide. (In comparison, the nearby Gables multi-family development is 275 feet long and 175 feet wide.) The Takoma Metro development is currently planned to be four stories high in the front (45’8”) rising to over 75 feet in the back. Welcoming a project of this magnitude into a single-family neighborhood would be a huge challenge. Getting it to a more manageable size is critical, but it is not possible to determine the appropriate setbacks, buffers, or building height and massing without information about the context of the project. Smart growth is not just about locating density at transit hubs. It’s about recognizing and respecting the context of what’s already



there and providing an organic transition between the old and the new in order to create a great livable urban neighborhood.

The context should recognize, enhance and be compatible with:

- The historic houses directly across the street, and the historic neighborhood that unfolds around them
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- The historic town center of which this is an extension
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- The topography of the site, which exists in a bowl
- The green space and tree canopies in the green space along Cedar Street and at the garden apartments on Eastern Avenue

As stated above, the developer has made several positive changes regarding the setbacks and height (along the garden apartments a partial 30-foot buffer and a 68-foot building setback is now proposed; along Eastern Avenue there would be a 30-foot setback, and the height steps back from 45 feet 8 inches along Eastern Avenue to 76 feet at the back of the site). Because the site is in a bowl, in order to determine the extent to which further changes are needed, it is vital that contextual information be provided. Arriving at an opinion on additional changes that would be needed to make the project compatible with the surrounding neighborhood -- especially in terms of height, massing and setback -- without that information would be irresponsible.

One opportunity to reduce scale that should be explored further is placing the WMATA parking either in a structure or underground, and placing the residential parking underground. Both of these solutions would substantially decrease the overall size of the building. Underground parking, which has been constructed for all the recently built area apartment buildings, is preferable, as it provides for the maximum amount of space for people and open space at the ground level. But, even structured parking is superior to the surface parking that is proposed under the building.

## GREEN SPACE

Another unresolved issue that has a direct bearing on the WMATA Board's decision is the amount of proposed green space. While it has been stated by WMATA that there will be a one-acre park along Cedar and Carroll Street, many in the community have understood that the entire area as it is now would become the park in perpetuity. According to WMATA staff, fully one-third of that site will be reserved by WMATA for future operations and will not be part of the park. Unfortunately, the EYA drawings seen by many in the community did not show the boundary of that park, and WMATA staff has not clearly justified the need for future facilities expansion.

The second green space area that is unresolved is the green buffer adjoining the apartments on Eastern Avenue. While the developer is providing a partial 30 foot buffer, this is only for a portion of the buffer and it decreases to zero feet where the drive aisle abuts the property line. We are very concerned about the significant loss of trees and diminished square footage as it is currently proposed. The developer should provide a detailed plan for this green space, including precise size measurements, a tree protection and replacement plan, and permanent protection for the proposed buffer. In addition, the developer should explore ways to improve the site design that could lead to a larger green space buffer along this property line.

#### POSTPONE YOUR DECISION -- IT'S REASONABLE

As noted above, the transit components of this project cannot be completely separated from the design components, and we therefore believe the WMATA facilities should not be approved until there is further opportunity for the community to discuss the proposed design with the developer. Accordingly, we urge the WMATA Board to hold off on a final vote on the Compact Hearing report to allow those discussions to continue. However, regardless of when the Board votes on the Compact Hearing report, we believe that it is crucial to include some conditions in that approval as stated below. Furthermore, we wish to make it clear that we will not hesitate to put these transit issues and their impacts on the table as part of future entitlement processes, including zoning and historic preservation.

We do not wish to create demands that prevent a project from going forward at the site. Asking for the WMATA parking to be in a structure is not unreasonable, as there are examples all over the region at other Metro stations. Asking the developer to place the residential parking underground is not unreasonable, as there are several recent examples in Takoma Park. The WMATA surface parking could also be screened with liner units, for which there are many precedents, or placed underground. The Kiss & Ride and disabled entrances, and other spaces geared towards proximity to the elevator could remain in a much smaller surface lot. A possible reduction in the number of transit user spaces should also be explored, as the proposed number of spaces does not appear to have a basis that is supported through analysis and policy.

#### NEED FOR A PARKING STUDY

It should be acknowledged that parking is a major concern for many neighbors and visitors to the commercial district. Planners understand that there is often a gap between the amount of perceived and actual parking. The only way to counter this misperception is through a parking study and analysis, which would measure the actual capacity of the streets and parking lots surrounding the Metro station and compare it to the peak hour usage and anticipated demand. It should also take into account the point that an assessment of commuter parking needs, based primarily

on current usage rates, is not a reliable approach, given the unusual parking restrictions currently in place there.

We should not be building more parking until we have used what we already have. Overbuilding parking is a scourge both in terms of cost to the developers (that money could have been spent on neighborhood benefits or higher quality architecture) and the neighborhood (in terms of having to live with a much larger building). It is important to explore the possibility of reducing the amount of parking on the site, or locating the parking underground, in order to achieve a smaller building, potentially with less living space or without reducing the living space.

### TRAFFIC CONCERNS

Traffic impacts on the neighborhood are still a concern for the community. We note the traffic study done by WMATA recommends several changes to improve traffic flow, such as signal optimization and lane configuration on Carroll Street and Piney Branch Road. While we understand that these changes are under the purview of DDOT, not WMATA, and that the traffic impacts will be reviewed as part of the rezoning process, we would like to explore these options further at the earliest opportunity.

### PUBLIC SAFETY

Public safety is a key issue for the neighborhood, especially in and around the surface parking lot. There is a highly regarded tool called CPTED (Crime Prevention Through Environmental Design) that relies on a variety of physical design techniques, such as natural surveillance or “eyes on the street,” to deter potential criminal actions. While the WMATA staff have indicated that there will be lighting, column spacing and signage in the parking lot intended to address public safety, the techniques used by CPTED are also necessary to make pedestrians feel safer. Implementing CPTED typically reduces the overall costs of preventing crime, and is much more effective when implemented as part of the design process rather than retrofitted. We believe that a CPTED analysis of the WMATA facilities, especially the parking lot, should be conducted and should include input from the community and police departments from both the District and Maryland.

### WMATA BOARD ACTION AND CONDITIONS

Again, we urge the WMATA Board to postpone approval of this project to allow further discussions on design and related issues involving the developer and the community. More specifically, we request the WMATA Board to attach the following conditions to any approval of this project:

1. Direct WMATA staff to create a neighborhood advisory committee to provide comments on the design, parking issues, and other neighborhood impacts, as

well as potential benefits and amenities; include WMATA representatives, developers, Office of Planning staff, and near-in, directly impacted neighbors from both Maryland and the District of Columbia.

2. Direct the developer to provide appropriate contextual drawings, sections, elevations and three-dimensional models to the community, along with alternative designs;
3. Direct the developer to propose a building that is appropriate for its context, in terms of the entire residential neighborhood, the commercial district and the Takoma Historic Districts;
4. Direct the developer to provide a parking study and analysis for the Metro station, discuss the parameters and goals with the community, to include an analysis of how the current parking is used, capacity on streets as well as other nearby parking facilities, current peak usage, and future demand, including an analysis of the impact of other area apartment buildings currently under construction or in the planning stages. The study should also provide an analysis of the impacts of parking on the size and cost of the building, including the impact on building design and overall size of placing all of the parking (residential and WMATA) in a structure or underground.
5. Ensure that the changes recommended by the Traffic Analysis can be implemented, and communicate the importance of the traffic impacts and the need for traffic mitigation to DDOT; and
6. Require a thorough CPTED (Crime Prevention through Environmental Design) analysis, with input from the community as well as the police departments from Maryland and the District of Columbia, and implementation of the CPTED recommendations.
7. Direct WMATA staff and the developer to provide the entire open green space along Carroll and Cedar Streets as a park in perpetuity and provide a green buffer in perpetuity adjoining the apartments on Eastern Avenue.
8. Direct WMATA staff and the developer to provide accurate descriptions of the amount and location of existing and proposed green space and to adopt a green space management plan that includes a tree protection plan. The tree protection plan should include a survey of existing trees and replacement trees of comparable number, species, and sizes.

Very truly yours,

Sara Green, on behalf of  
DC MD Neighbors for Takoma Transit

Jacqueline Davison  
Sabrina Eaton  
Pamela Ellison  
Peter Feiden  
Linda Gray  
Faroll Hamer  
Sara K. Hayden  
Peter Kovar  
Lorraine Pearsall  
Joseph Radzievich  
Faith Wheeler

## writtentestimony

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**From:** Seth Grimes <sethg@takomaparkmd.gov>  
**Sent:** Monday, March 02, 2015 4:49 PM  
**To:** writtentestimony  
**Subject:** Comment on the Takoma Public Hearing Staff Report, R14-01  
**Attachments:** 2015-11-Takoma-Metro-resolution-signed.pdf

Regarding the Takoma Public Hearing Staff Report, R14-01 --

I drafted the City of Takoma Park's resolution and comment, attached. I wish to reemphasize points made by saying that while the staff report is generally a fair summary of the June 18, 2014 public hearing, the staff response to points raised in June 18 testimony, including points that I personally made, is unsatisfying.

The inclusion of developer EYA's latest Takoma Metro design revision only reemphasizes that the site design -- covering the transit and residential facilities both -- is a WMATA concern. The design revision does NOT sufficiently reduce the amount of residential parking, per the WMATA Board's March 27, 2014 Board Resolution 2014-11. The design includes an oversupply of residential parking, as measured by transit-oriented development standards and against proposed Washington DC zoning rules for development in a transit zone. The residential parking oversupply will cost WMATA transit revenue as well as lead to higher construction costs, excessive traffic congestion (affecting transit functions provided by Metrobus, Ride On, and bicycle routes), and neighborhood compatibility issues. I reiterate that the WMATA Board should not accept the staff report until points raised in the Takoma Park comment, and in previous city and public testimony, have been acceptably addressed.

Thank you for this opportunity to comment on the staff report.

Sincerely,

Seth Grimes

Councilmember, Ward 1  
City of Takoma Park  
[sethg@takomaparkmd.gov](mailto:sethg@takomaparkmd.gov)  
301-873-8225

Accepting requests for funding through the Takoma Park Community Grants Program.  
[www.takomaparkmd.gov/hcd/community-grants](http://www.takomaparkmd.gov/hcd/community-grants)

## writtentestimony

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**From:** M Hovancsek <mhovancsek@gmail.com>  
**Sent:** Monday, March 02, 2015 12:59 PM  
**To:** writtentestimony  
**Subject:** Takoma Metro Project Concern

Hello,

My husband and I wanted to voice our concern about the proposed project at the Takoma Metro Station. We are seriously concerned about the scale of the proposed building: height, setbacks, buffer and massing in relation to existing buildings in the residential neighborhood where we live.

We urge the WMATA Board to postpone a final vote on the Compact Hearing report to allow for a continuation of the promising discussions that have begun to take place between the community and the developer.

Marcella Hovancsek

## writtentestimony

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**From:** Irene Huntoon <iehuntoon@verizon.net>  
**Sent:** Tuesday, February 24, 2015 8:54 AM  
**To:** writtentestimony  
**Subject:** Commentary on Project R14-01

Dear Committee Members,

I write to you as a resident of Takoma Park, Maryland and as a supporter of the goal of developing underutilized spaces near metro stations. Despite my support in principle, two components of the proposed design at the Takoma Metro (R14-01) are of significant concern.

1. The proposed height of the tower at 69.5 feet is unacceptable. 69.5 feet is not only 19.5 feet higher than the maximum height allowed by the zoning for the site, it is a whopping 39% higher and will produce a building that is way out of scale with the surrounding neighborhood. Its scale alone will make it an eyesore, plus it will cast a much larger shadow and have a negative impact on lower buildings on both the DC and Maryland sides of the border. I urge you to require that any structure built on this site conform to the zoning limits without an exception of any sort.
2. The inclusion of so much residential parking (the .55 parking ratio) at a transit hub *for both trains and buses* is astounding. It is antithetical to smart growth policies. And it flouts WMATA's stated policy of minimizing residential parking in order to encourage the use of public transit and to reduce vehicular traffic congestion (i.e., buses can't travel as quickly on roads bound up with car traffic). I urge you to make a steep reduction in the number of residential parking spaces to a ratio of .17, the ratio that will be set with the zoning rewrite that is currently in process. The density of traffic in this neighborhood is already too high. Use your capacity as decision-makers to solve problems rather than add to them.

Sincerely,

Irene Huntoon  
7211 Maple Avenue  
Takoma Park, MD 20912



## writtentestimony

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**From:** Austin Jacobson <amjac1@gmail.com>  
**Sent:** Wednesday, February 25, 2015 5:22 PM  
**To:** writtentestimony  
**Subject:** Concerns Regarding Upcoming Development

Dear WMATA Board Members:

We are writing as members of DC-Maryland Neighbors for Takoma Transit, a group of neighbors who live in the Washington, DC and Maryland neighborhoods near the Takoma Metro Station joint development site that is the subject of this hearing.

We support a multifamily building at this location. We like the idea of replacing the large existing surface parking lot with a project that will provide housing for new members of our neighborhood that we love so much. We especially support keeping the green space at Cedar and Carroll Streets as a permanent public park and the green space adjoining the garden apartments on Eastern Avenue as a permanent green buffer. We believe a well thought-out, properly designed project can provide additional housing units, strengthen the neighborhood and the local economy, and improve access to transit.

### WE HAVE RESERVATIONS ABOUT THE CURRENT DESIGN

We have serious reservations about the scale of the proposed building, and especially the height, setbacks, buffer and massing, in relationship to the existing buildings in the residential neighborhood as well as the buildings along the commercial streets. We also have reservations about the amount and location of both the public WMATA parking and the private residential parking. **Because of these reservations, as described in more detail below, we urge the WMATA Board to postpone a final vote on the Compact Hearing report to allow for a continuation of the promising discussions that have begun to take place between the community and the developer, and to include certain conditions relating to design as part of the final vote.**

[The complete details of the reservations I and the rest of the neighborhood have are written in the complete letter you received from Takoma Transit.]

Thank you for reading,

Austin Jacobson

## writtentestimony

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**From:** Judith Johnson <judithheron@gmail.com>  
**Sent:** Wednesday, February 25, 2015 4:23 PM  
**To:** writtentestimony  
**Subject:** Takoma Metro development

Hello, I support the comments of the

### **DC-MD Neighbors for Takoma Transit**

February 23, 2015

WMATA Board Members  
Office of the Secretary  
Washington Metropolitan Area Transit Authority  
600 Fifth Street, NW  
Washington, DC 20001

**Re: Docket No. R14-01:**  
Proposed Changes to WMATA Facilities at Takoma Metro Station

I have the same concerns as do they, except that I do not want to see the amount of parking reduced at the metro station. Perhaps it could go underground. I drive to metro to go into DC and need a place to park. thank you.

Judith johnson  
915 heron Dr  
Silver Spring, MD. 20901

**writtentestimony**

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**From:** Priscilla Labovitz <labovitz@earthlink.net>  
**Sent:** Monday, March 02, 2015 4:43 PM  
**To:** writtentestimony  
**Subject:** Fwd: R14-01 - Comments on Public Hearing Staff Report dated January 2015

Subject: R14-01 - Comments on Public Hearing Staff Report dated January 2015

March 2, 2015

WMATA  
Office of the Secretary  
600 Fifth Street, NW  
Washington, DC 20001

RE: R14-01 Proposed Changes at Takoma Metro Station

Dear Sir or Madam:

I am writing in response to your Public Hearing Staff Report dated January 2015. The stated purpose of the report is to compile and respond to issues raised by members of the public at WMATA's legally-mandated Public Hearing on June 18, 2014 and in written comments received by June 30, 2014.

Do Not Approve the Staff Report Now

The staff report fails to resolve significant issues raised by the majority of commenters. I urge you NOT to approve this staff report until you obtain from the developer a plan that is more compatible with the surrounding neighborhood and does not impede the transit functioning of the station. As Marc Elrich, Montgomery County Councilmember, stated at the hearing, "It is hard to claw back from a developer the things a community wants once the deal has been made. Your leverage is before you make a deal." (Hearing Transcript, page 28).

### Allow Neighborly Talks to Continue With the Developer

It is my understanding that some talks have taken place between the developer and DC-MD Neighbors for Takoma Transit, a group of neighbors who support development but have serious concerns with the current plan. I support their efforts. I urge you to hold off acting on this staff report while those conversations continue.

### WMATA May Not Diminish the Public Green Space Without Public Comment

I was puzzled to read in the staff report that “[t]he portion of the open space area along Eastern Avenue that will *not* be preserved for the village green may be made available in the future for expanded bus service should that be necessary.” (Staff Report, page 18, italics added). What portion of the space is the staff referring to? The developer has not depicted any such portion in its drawings. This is the first reference to reducing the size of the green area bounded by Carroll Avenue, Cedar Street, and Eastern Avenue, and it cannot be re-sectioned by fiat in this staff report without public comment.

### WMATA Should Require Better Drawings and Models

I realize that the developer modified its site plan in January 2015, and it may be an improvement. However, it is not possible to evaluate the revised plan with the drawings that are currently available. WMATA should require the developer to prepare scale drawings and models of its proposed building in the context of other nearby buildings (adjacent on Eastern Avenue and across Eastern Avenue) with topography, heights, and setbacks clearly delineated.

### Traffic Impacts on Congestion and Public Safety Are Not Addressed

I do not believe that the staff is correct to discount concerns about traffic congestion and the impact on public safety. Eastern Avenue is one of only two routes a public safety vehicle would use to get to nearby Maryland addresses, and it is important that this project not impede this access.

### There Are Still Parking Issues

I commend the staff for recommending a simpler parking plan without turning the space into a commuter lot. However, I continue to have concerns that there be adequate non-commuter parking for neighborhood residents. Unfortunately, crime on the surrounding streets is a problem. When using the Metro at night, many of us who live close enough to walk nevertheless drive to the station. Without adequate parking, we will simply drive to our destinations, rather than take Metro.

### Will the Plan for the Loading Docks Work?

While I believe moving the loading docks off Eastern Avenue is an improvement, (and I am glad to see that the buffer with the apartments will be enlarged), I was concerned to read that the trucks will now be able to “back in safely to the loading docks...”. (Staff Report, page 18). If the loading docks are now to be located at the Kiss & Ride facility entrance drive, won’t the trucks’ maneuvering block the Kiss and Ride access lanes?

### It is Unfair to Exclude Maryland Neighbors from the Process

If you approve this staff report, further consideration of this development will move to the DC Zoning Commission where Maryland residents have no automatic right to participate. While the staff report states that WMATA’s Board pledged in its deliberations “to recommend party status for Takoma Park, Maryland,” (page 20), there is no guarantee of such status. All of our testifying Maryland elected officials -- Congressman Chris Van Hollen, State Senator Jamie Raskin, Montgomery County Councilmembers Mark Elrich and Tom Hucker – have urged you to allow their constituents to work with other DC residents and the developer to improve the project. Such an informal group has been formed, and it is my understanding that they are working productively with the developer. You should allow this group to continue its work and consider its recommendations rather than push the process on to the local DC agencies, where Marylanders will have no opportunity for input.

Thank you for your consideration,

Priscilla Labovitz

Joseph Cirincione

7303 Birch Avenue

Takoma Park, MD 20912

## writtentestimony

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**From:** Maggie Little <littlem@georgetown.edu>  
**Sent:** Saturday, February 28, 2015 5:47 PM  
**To:** writtentestimony  
**Subject:** Takoma Park Metro development  
**Attachments:** final draft of letter 9.26.2.doc

I am writing to express my strong request that Metro delay final vote on the Takoma Park Metro development. I am in the neighborhood immediately adjacent to the proposed development, and while our household strongly supports smart growth of the metro area here, including housing, we, along with many other neighbors, have specific concerns about important needed adjustments in the current plan. The good news is that the developer has been working with our neighborhood association, and we feel a mutually agreeable proposal -- one that is good for all -- is in the works. We do request that the final vote be delayed to allow time for this critical and specific process to come to fruition. We are truly not trying to simply delay things; rather, we think the difference between the current proposal and one in the process of conversation is a huge one. I append here the letter that has also been forwarded to your office.

Many thanks for your consideration on this important issue.

Maggie Little  
105 Tulip Avenue  
Takoma Park MD 20912

## DC-MD Neighbors for Takoma Transit

February 23, 2015

WMATA Board Members  
Office of the Secretary  
Washington Metropolitan Area Transit Authority  
600 Fifth Street, NW  
Washington, DC 20001

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- The green space and tree canopies in the green space along Cedar Street and at the garden apartments on Eastern Avenue

As stated above, the developer has made several positive changes regarding the setbacks and height (along the garden apartments a partial 30-foot buffer and a 68-foot building setback is now proposed; along Eastern Avenue there would be a 30-foot setback, and the height steps back from 45 feet 8 inches along Eastern Avenue to 76 feet at the back of the site). Because the site is in a bowl, in order to determine the extent to which further changes are needed, it is vital that contextual information be provided. Arriving at an opinion on additional changes that would be needed to make the project compatible with the surrounding neighborhood -- especially in terms of height, massing and setback -- without that information would be irresponsible.

One opportunity to reduce scale that should be explored further is placing the WMATA parking either in a structure or underground, and placing the residential parking underground. Both of these solutions would substantially decrease the overall size of the building. Underground parking, which has been constructed for all the recently built area apartment buildings, is preferable, as it provides for the maximum amount of space for people and open space at the ground level. But, even structured parking is superior to the surface parking that is proposed under the building.

## GREEN SPACE

Another unresolved issue that has a direct bearing on the WMATA Board's decision is the amount of proposed green space. While it has been stated by WMATA that there will be a one-acre park along Cedar and Carroll Street, many in the community have understood that the entire area as it is now would become the park in perpetuity. According to WMATA staff, fully one-third of that site will be reserved by WMATA for future operations and will not be part of the park. Unfortunately, the EYA drawings seen by many in the community did not show the boundary of that park, and WMATA staff has not clearly justified the need for future facilities expansion.

The second green space area that is unresolved is the green buffer adjoining the apartments on Eastern Avenue. While the developer is providing a partial 30 foot buffer, this is only for a portion of the buffer and it decreases to zero feet where the drive aisle abuts the property line. We are very concerned about the significant loss of trees and diminished square footage as it is currently proposed. The developer should provide a detailed plan for this green space, including precise size measurements, a tree protection and replacement plan, and permanent protection for the proposed buffer. In addition, the developer should explore ways to improve the site design that could lead to a larger green space buffer along this property line.

#### POSTPONE YOUR DECISION -- IT'S REASONABLE

As noted above, the transit components of this project cannot be completely separated from the design components, and we therefore believe the WMATA facilities should not be approved until there is further opportunity for the community to discuss the proposed design with the developer. Accordingly, we urge the WMATA Board to hold off on a final vote on the Compact Hearing report to allow those discussions to continue. However, regardless of when the Board votes on the Compact Hearing report, we believe that it is crucial to include some conditions in that approval as stated below. Furthermore, we wish to make it clear that we will not hesitate to put these transit issues and their impacts on the table as part of future entitlement processes, including zoning and historic preservation.

We do not wish to create demands that prevent a project from going forward at the site. Asking for the WMATA parking to be in a structure is not unreasonable, as there are examples all over the region at other Metro stations. Asking the developer to place the residential parking underground is not unreasonable, as there are several recent examples in Takoma Park. The WMATA surface parking could also be screened with liner units, for which there are many precedents, or placed underground. The Kiss & Ride and disabled entrances, and other spaces geared towards proximity to the elevator could remain in a much smaller surface lot. A possible reduction in the number of transit user spaces should also be explored, as the proposed number of spaces does not appear to have a basis that is supported through analysis and policy.

#### NEED FOR A PARKING STUDY

It should be acknowledged that parking is a major concern for many neighbors and visitors to the commercial district. Planners understand that there is often a gap between the amount of perceived and actual parking. The only way to counter this misperception is through a parking study and analysis, which would measure the actual capacity of the streets and parking lots surrounding the Metro station and compare it to the peak hour usage and anticipated demand. It should also take into account the point that an assessment of commuter parking needs, based primarily

on current usage rates, is not a reliable approach, given the unusual parking restrictions currently in place there.

We should not be building more parking until we have used what we already have. Overbuilding parking is a scourge both in terms of cost to the developers (that money could have been spent on neighborhood benefits or higher quality architecture) and the neighborhood (in terms of having to live with a much larger building). It is important to explore the possibility of reducing the amount of parking on the site, or locating the parking underground, in order to achieve a smaller building, potentially with less living space or without reducing the living space.

### TRAFFIC CONCERNS

Traffic impacts on the neighborhood are still a concern for the community. We note the traffic study done by WMATA recommends several changes to improve traffic flow, such as signal optimization and lane configuration on Carroll Street and Piney Branch Road. While we understand that these changes are under the purview of DDOT, not WMATA, and that the traffic impacts will be reviewed as part of the rezoning process, we would like to explore these options further at the earliest opportunity.

### PUBLIC SAFETY

Public safety is a key issue for the neighborhood, especially in and around the surface parking lot. There is a highly regarded tool called CPTED (Crime Prevention Through Environmental Design) that relies on a variety of physical design techniques, such as natural surveillance or “eyes on the street,” to deter potential criminal actions. While the WMATA staff have indicated that there will be lighting, column spacing and signage in the parking lot intended to address public safety, the techniques used by CPTED are also necessary to make pedestrians feel safer. Implementing CPTED typically reduces the overall costs of preventing crime, and is much more effective when implemented as part of the design process rather than retrofitted. We believe that a CPTED analysis of the WMATA facilities, especially the parking lot, should be conducted and should include input from the community and police departments from both the District and Maryland.

### WMATA BOARD ACTION AND CONDITIONS

Again, we urge the WMATA Board to postpone approval of this project to allow further discussions on design and related issues involving the developer and the community. More specifically, we request the WMATA Board to attach the following conditions to any approval of this project:

1. Direct WMATA staff to create a neighborhood advisory committee to provide comments on the design, parking issues, and other neighborhood impacts, as

well as potential benefits and amenities; include WMATA representatives, developers, Office of Planning staff, and near-in, directly impacted neighbors from both Maryland and the District of Columbia.

2. Direct the developer to provide appropriate contextual drawings, sections, elevations and three-dimensional models to the community, along with alternative designs;
3. Direct the developer to propose a building that is appropriate for its context, in terms of the entire residential neighborhood, the commercial district and the Takoma Historic Districts;
4. Direct the developer to provide a parking study and analysis for the Metro station, discuss the parameters and goals with the community, to include an analysis of how the current parking is used, capacity on streets as well as other nearby parking facilities, current peak usage, and future demand, including an analysis of the impact of other area apartment buildings currently under construction or in the planning stages. The study should also provide an analysis of the impacts of parking on the size and cost of the building, including the impact on building design and overall size of placing all of the parking (residential and WMATA) in a structure or underground.
5. Ensure that the changes recommended by the Traffic Analysis can be implemented, and communicate the importance of the traffic impacts and the need for traffic mitigation to DDOT; and
6. Require a thorough CPTED (Crime Prevention through Environmental Design) analysis, with input from the community as well as the police departments from Maryland and the District of Columbia, and implementation of the CPTED recommendations.
7. Direct WMATA staff and the developer to provide the entire open green space along Carroll and Cedar Streets as a park in perpetuity and provide a green buffer in perpetuity adjoining the apartments on Eastern Avenue.
8. Direct WMATA staff and the developer to provide accurate descriptions of the amount and location of existing and proposed green space and to adopt a green space management plan that includes a tree protection plan. The tree protection plan should include a survey of existing trees and replacement trees of comparable number, species, and sizes.

Very truly yours,

Sara Green, on behalf of  
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Jacqueline Davison  
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Linda Gray  
Faroll Hamer  
Sara K. Hayden  
Peter Kovar  
Lorraine Pearsall  
Joseph Radzievich  
Faith Wheeler

## writtentestimony

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**From:** Jeffrey Lubbers <jsl26@aol.com>  
**Sent:** Monday, March 02, 2015 3:03 PM  
**To:** writtentestimony  
**Subject:** Comment on Docket No. R14-01--Takoma Metro station

Re: Docket No. R14-01:  
Proposed Changes to WMATA Facilities at Takoma Metro Station

Dear WMATA Board Members:

I live about one mile away from the site, drive past it almost every day and park at the lot when I can. I have several concerns about the proposed changes. I've heard from community leaders that promising discussions that have begun to take place between the community and the developer, so I urge the WMATA Board to postpone a final vote on the Compact Hearing report to allow for a continuation of these discussions. I also have some comments about specific aspects of the plan.

Reduction in parking spaces in the Metro Lot. Currently there are 141 metered spaces, and the proposal is to reduce that to 87. The justification is that the current spaces are only used at a 50% capacity.

But the main reason it is under used is the user unfriendly crazy time restrictions on the parking lot. In one half of the lot, parking is permitted from 10 AM until 2 AM. In the other half parking is only allowed from 8:30 AM until 2:30 PM. This means that if I arrive before 10 AM to go downtown I have to make sure I am back by 2:30 PM to avoid an expensive parking ticket—something that is often impossible to control due to the way downtown appointments proceed. So it is no wonder that the lot is underutilized. I live about a mile away from the station would use it a lot more on weekdays if I could.

Proof of this pent-up demand is in the weekends when parking is free and there are no time restrictions. The lot is often full—and would be more so if weekend Red Line services were more reliable—which hopefully it will be in the future. You need to take into account the future well-maintained Red Line in your projections.

I applaud the proposal for removing these odd time restrictions, this should make the lot much more popular—which will reduce driving downtown and also increase Metro ridership. So it is completely counterproductive to reduce the number of spaces at the same time by 38%.

I also strongly oppose making the lot a paying lot on weekends. This will only serve to make people drive downtown and reduce Metro ridership even more.

So please maintain (or expand) the current level of parking spaces and please maintain free parking on weekends.

I am not opposed to having underground parking at the site if it made it possible to increase the spaces and if the lighting and security were maximized. I also think that when building the new residential development, it should include an underground lot for the residents. This will maximize green space, reduce street and traffic congestion and provide more security for the residents. It also can be more easily done during construction of the new facility.

Finally—I would hope that the small park near the current metro station is preserved in perpetuity, and that there is a greenspace buffer between the metro parking lot and the new development.

Sincerely

Jeffrey S. Lubbers  
816 Hudson Avenue  
Takoma Park, MD 20912

## writtentestimony

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**From:** Richard Mellman and Marianne Alweis <alweismellman@gmail.com>  
**Sent:** Monday, March 02, 2015 10:46 AM  
**To:** writtentestimony  
**Subject:** WMATA testimony re: Takoma development  
**Attachments:** Takoma station devo WMATAletter 9 26 2.doc

Regarding the planned development at the Takoma station, we support the position of the DC MD Neighbors for Takoma Transit- see letter attached.

Thank you for your consideration of this crucial planning decision.

Marianne Alweis  
Richard Mellman  
7116 Cedar Ave.  
Takoma Park, MD



## DC-MD Neighbors for Takoma Transit

February 23, 2015

WMATA Board Members  
Office of the Secretary  
Washington Metropolitan Area Transit Authority  
600 Fifth Street, NW  
Washington, DC 20001

**Re: Docket No. R14-01:**

Proposed Changes to WMATA Facilities at Takoma Metro Station

Dear WMATA Board Members:

We are writing as members of DC-Maryland Neighbors for Takoma Transit, a group of neighbors who live in the Washington, DC and Maryland neighborhoods near the Takoma Metro Station joint development site that is the subject of this hearing.

We support a multifamily building at this location. We like the idea of replacing the large existing surface parking lot with a project that will provide housing for new members of our neighborhood that we love so much. We especially support keeping the green space at Cedar and Carroll Streets as a permanent public park and the green space adjoining the garden apartments on Eastern Avenue as a permanent green buffer. We believe a well thought-out, properly designed project can provide additional housing units, strengthen the neighborhood and the local economy, and improve access to transit.

### WE HAVE RESERVATIONS ABOUT THE CURRENT DESIGN

We have serious reservations about the scale of the proposed building, and especially the height, setbacks, buffer and massing, in relationship to the existing buildings in the residential neighborhood as well as the buildings along the commercial streets. We also have reservations about the amount and location of both the public WMATA parking and the private residential parking. **Because of these reservations, as described in more detail below, we urge the WMATA Board to postpone a final vote on the Compact Hearing report to allow for a continuation of the promising discussions that have begun to take place between the community and the developer, and to include certain conditions relating to design as part of the final vote.**

## PODIUM PARKING AND WMATA PROCESS

It is clear that the proposed location of the transit elements and the transit parking dictate, to a large extent, the building design and massing, and cannot be evaluated independently. The WMATA staff report states, *“Staff believes that the proposed transit facilities can be evaluated independently of aspects of building design that do not physically intersect with those facilities.”* However, the proposed parking lot DOES physically intersect with the building. The layout of this fully one-acre surface lot dominates the site and gives prominence to cars over all other modes of access. The parking structure is not a garage. There are no walls. This is an open surface parking lot that covers about two-thirds of the site, and it is underneath a podium-style building that sits on top of the parking lot. Only the front portion of the building along Eastern Avenue is built to the ground. Most of the first floor of the building has no sides, and the drive aisle for the parking lot is outside of the upper stories of the building wall, making screening ineffective. Many podium buildings similar to this were built in the 1970s and 80s as part of Urban Renewal programs, but this style has gone out of favor ever since New Urbanism recognized the importance of the traditional urban form in creating desirable neighborhoods.

The classic urban form is a building with a base, middle and top. This form is the key to the pedestrian experience. The base is most important, and it should be activated through entrances, windows, or stoops and porches. Activating this edge of the building, where so many pedestrians and bus riders will walk and wait, is critical. The bus loop and sidewalk along this edge of the building function as a public street, just as much as Eastern Avenue, and like Eastern Avenue it will be perceived as the frontage for the building. It will also be highly visible from Cedar and Carroll Streets, through the park. It would be desirable to have an attractive building façade along the length of this “street,” punctuated by some ground level open space, not a view of cars, paving, bright security lights and potentially worrisome hiding places in the shadows created by pillars and cars.

## WE ARE DISAPPOINTED IN THE LACK OF CONTEXT SHOWN IN CURRENT PLANS

We acknowledge that the developer has made some meaningful changes that begin to address the community’s concerns, as demonstrated in Exhibit H. However, we are disappointed that the developer has still not provided any contextual information. This is a big site – it is the full size of a typical Takoma Park block – and it’s a big building. It’s nearly 400 feet long and varies from 160 to 230 feet wide. (In comparison, the nearby Gables multi-family development is 275 feet long and 175 feet wide.) The Takoma Metro development is currently planned to be four stories high in the front (45’8”) rising to over 75 feet in the back. Welcoming a project of this magnitude into a single-family neighborhood would be a huge challenge. Getting it to a more manageable size is critical, but it is not possible to determine the appropriate setbacks, buffers, or building height and massing without information about the context of the project. Smart growth is not just about locating density at transit hubs. It’s about recognizing and respecting the context of what’s already

there and providing an organic transition between the old and the new in order to create a great livable urban neighborhood.

The context should recognize, enhance and be compatible with:

- The historic houses directly across the street, and the historic neighborhood that unfolds around them
- The garden-style apartments adjoining the north boundary
- The views from Cedar Street and Carroll Street across the park
- The historic town center of which this is an extension
- The elevated metro tracks
- The topography of the site, which exists in a bowl
- The green space and tree canopies in the green space along Cedar Street and at the garden apartments on Eastern Avenue

As stated above, the developer has made several positive changes regarding the setbacks and height (along the garden apartments a partial 30-foot buffer and a 68-foot building setback is now proposed; along Eastern Avenue there would be a 30-foot setback, and the height steps back from 45 feet 8 inches along Eastern Avenue to 76 feet at the back of the site). Because the site is in a bowl, in order to determine the extent to which further changes are needed, it is vital that contextual information be provided. Arriving at an opinion on additional changes that would be needed to make the project compatible with the surrounding neighborhood -- especially in terms of height, massing and setback -- without that information would be irresponsible.

One opportunity to reduce scale that should be explored further is placing the WMATA parking either in a structure or underground, and placing the residential parking underground. Both of these solutions would substantially decrease the overall size of the building. Underground parking, which has been constructed for all the recently built area apartment buildings, is preferable, as it provides for the maximum amount of space for people and open space at the ground level. But, even structured parking is superior to the surface parking that is proposed under the building.

## GREEN SPACE

Another unresolved issue that has a direct bearing on the WMATA Board's decision is the amount of proposed green space. While it has been stated by WMATA that there will be a one-acre park along Cedar and Carroll Street, many in the community have understood that the entire area as it is now would become the park in perpetuity. According to WMATA staff, fully one-third of that site will be reserved by WMATA for future operations and will not be part of the park. Unfortunately, the EYA drawings seen by many in the community did not show the boundary of that park, and WMATA staff has not clearly justified the need for future facilities expansion.

The second green space area that is unresolved is the green buffer adjoining the apartments on Eastern Avenue. While the developer is providing a partial 30 foot buffer, this is only for a portion of the buffer and it decreases to zero feet where the drive aisle abuts the property line. We are very concerned about the significant loss of trees and diminished square footage as it is currently proposed. The developer should provide a detailed plan for this green space, including precise size measurements, a tree protection and replacement plan, and permanent protection for the proposed buffer. In addition, the developer should explore ways to improve the site design that could lead to a larger green space buffer along this property line.

#### POSTPONE YOUR DECISION -- IT'S REASONABLE

As noted above, the transit components of this project cannot be completely separated from the design components, and we therefore believe the WMATA facilities should not be approved until there is further opportunity for the community to discuss the proposed design with the developer. Accordingly, we urge the WMATA Board to hold off on a final vote on the Compact Hearing report to allow those discussions to continue. However, regardless of when the Board votes on the Compact Hearing report, we believe that it is crucial to include some conditions in that approval as stated below. Furthermore, we wish to make it clear that we will not hesitate to put these transit issues and their impacts on the table as part of future entitlement processes, including zoning and historic preservation.

We do not wish to create demands that prevent a project from going forward at the site. Asking for the WMATA parking to be in a structure is not unreasonable, as there are examples all over the region at other Metro stations. Asking the developer to place the residential parking underground is not unreasonable, as there are several recent examples in Takoma Park. The WMATA surface parking could also be screened with liner units, for which there are many precedents, or placed underground. The Kiss & Ride and disabled entrances, and other spaces geared towards proximity to the elevator could remain in a much smaller surface lot. A possible reduction in the number of transit user spaces should also be explored, as the proposed number of spaces does not appear to have a basis that is supported through analysis and policy.

#### NEED FOR A PARKING STUDY

It should be acknowledged that parking is a major concern for many neighbors and visitors to the commercial district. Planners understand that there is often a gap between the amount of perceived and actual parking. The only way to counter this misperception is through a parking study and analysis, which would measure the actual capacity of the streets and parking lots surrounding the Metro station and compare it to the peak hour usage and anticipated demand. It should also take into account the point that an assessment of commuter parking needs, based primarily

on current usage rates, is not a reliable approach, given the unusual parking restrictions currently in place there.

We should not be building more parking until we have used what we already have. Overbuilding parking is a scourge both in terms of cost to the developers (that money could have been spent on neighborhood benefits or higher quality architecture) and the neighborhood (in terms of having to live with a much larger building). It is important to explore the possibility of reducing the amount of parking on the site, or locating the parking underground, in order to achieve a smaller building, potentially with less living space or without reducing the living space.

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### WMATA BOARD ACTION AND CONDITIONS

Again, we urge the WMATA Board to postpone approval of this project to allow further discussions on design and related issues involving the developer and the community. More specifically, we request the WMATA Board to attach the following conditions to any approval of this project:

1. Direct WMATA staff to create a neighborhood advisory committee to provide comments on the design, parking issues, and other neighborhood impacts, as

well as potential benefits and amenities; include WMATA representatives, developers, Office of Planning staff, and near-in, directly impacted neighbors from both Maryland and the District of Columbia.

2. Direct the developer to provide appropriate contextual drawings, sections, elevations and three-dimensional models to the community, along with alternative designs;
3. Direct the developer to propose a building that is appropriate for its context, in terms of the entire residential neighborhood, the commercial district and the Takoma Historic Districts;
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5. Ensure that the changes recommended by the Traffic Analysis can be implemented, and communicate the importance of the traffic impacts and the need for traffic mitigation to DDOT; and
6. Require a thorough CPTED (Crime Prevention through Environmental Design) analysis, with input from the community as well as the police departments from Maryland and the District of Columbia, and implementation of the CPTED recommendations.
7. Direct WMATA staff and the developer to provide the entire open green space along Carroll and Cedar Streets as a park in perpetuity and provide a green buffer in perpetuity adjoining the apartments on Eastern Avenue.
8. Direct WMATA staff and the developer to provide accurate descriptions of the amount and location of existing and proposed green space and to adopt a green space management plan that includes a tree protection plan. The tree protection plan should include a survey of existing trees and replacement trees of comparable number, species, and sizes.

Very truly yours,

Sara Green, on behalf of  
DC MD Neighbors for Takoma Transit

Jacqueline Davison  
Sabrina Eaton  
Pamela Ellison  
Peter Feiden  
Linda Gray  
Faroll Hamer  
Sara K. Hayden  
Peter Kovar  
Lorraine Pearsall  
Joseph Radzievich  
Faith Wheeler

March 1, 2015

WMATA Board Members  
Office of the Secretary  
Washington Metropolitan Area Transit Authority  
600 Fifth Street, NW  
Washington, DC 20001

**Re: Docket No. R14-01:**

Proposed Changes to WMATA Facilities at Takoma Metro Station

Dear WMATA Board Members:

I am writing as a neighbor who lives near the Takoma Metro Station joint development site that is the subject of this hearing.

I support building multifamily housing at this location, but **have some reservations.**

1. I have **serious reservations about the scale of the proposed building**, and especially the height, setbacks, buffer and massing, in relationship to the existing buildings in the residential neighborhood as well as the buildings along the commercial streets.
2. **I am very concerned that WMATA is planning to reduce the total number of parking spots for Metro riders – so many of us are “baby boomers” who are attempting to “age in place” and suffer increasing arthritis, heart disease, hypertension, sciatica, hip, knee, foot, back conditions.** Only a very few blocks in both Maryland and DC would be considered “walking distance” for resident with any injuries or “conditions” – this is different from Handicapped – just ordinary aging folks that sometimes find it hard to walk more than a quarter of a mile to Metro. Most Takoma Park residents live at least a half mile to 2 miles away from the Metro station. Many streets are dark, have little foot traffic in the evenings, and there have been several muggings / attacks / armed robberies on individuals on both the DC and MD sides of the Metro. **Maintaining the current number of parking spots provides a way for area residents to travel safely to and from the Metro, especially during evening hours.** I am aware that the Metro parking lot has lots of empty spaces during the day, but many of those spaces currently are highly restrictive in terms of the hours of use. On weekends and evenings, it is often difficult to find a spot at the Metro lot, especially when there are popular events in DC (and we all know that parking is severely limited in downtown DC near many of the popular venues). **I urge you to keep the current number of Metro rider parking spots, and look into the possibility of underground parking facilities as a possible alternative.**



3. I am concerned about additional traffic in the neighborhood. At the community meeting that I attended it wasn't clear if the traffic study included the new apartment buildings in the planning stages, Busboys and Poets, and several other proposed commercial enterprises. I would suggest revisiting the traffic study in light of the totality of new developments in the area.

**I would like to see the WMATA Board postpone approval of this project to allow further discussions on design and related issues involving the developer and the community. I agree with the following points presented by DC MD Neighbors for Takoma Transit**

4.
  1. Direct WMATA staff to create a neighborhood advisory committee to provide comments on the design, parking issues, and other neighborhood impacts, as well as potential benefits and amenities; include WMATA representatives, developers, Office of Planning staff, and near-in, directly impacted neighbors from both Maryland and the District of Columbia.
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green buffer in perpetuity adjoining the apartments on Eastern Avenue.

8. Direct WMATA staff and the developer to provide accurate descriptions of the amount and location of existing and proposed green space and to adopt a green space management plan that includes a tree protection plan. The tree protection plan should include a survey of existing trees and replacement trees of comparable number, species, and sizes.

Very truly yours,

Carol Mermey  
7415 Holly Ave  
Takoma Park, MD 20912  
cmermey@gmail.com