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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 start 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

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

46 City comment:

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

51 Residential Parking Oversupply

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

57 City comment:

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

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

67 Yet the current building design includes four levels of residential parking with an estimated
68 116 residential parking spaces for an "apartment complex of approximately 200 units." **A
69 .58 parking ratio, over three times the District's revised zoning's minimum, indicates
70 that developer EYA has not answered the WMATA Board's direction that staff and the
71 developer "minimize the number of the project's residential parking spaces in order
72 to promote greater transit utilization by residents and reduce traffic impact."**

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

76 Misrepresentation of Existing Takoma Metro Site Park Land

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

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

82 City comment:

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

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

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

95 Bicycle Facilities, Metropolitan Branch Trail

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

101 City comment:

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

107 Access Lanes

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

113 City comment:

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

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

123 Loading Dock Safety

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

128 City comment:

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

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

136 Neighborhood Design Working Group

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

144 City comment:

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

149 Building Design

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

157 City comment:

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

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

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