

DC/MD Neighbors for Takoma Transit

January 21, 2014

WMATA Board
Washington Metropolitan Area Transit Authority
600 5th Street, NW
Washington, DC 20001

DC/MD Neighbors for Takoma Transit, a group of Washington, DC and Maryland residents of Takoma DC and Takoma Park, MD, is pleased to address you on issues regarding the residential development proposed for the current Takoma Metro station site.

We know that as Metro Board members you take seriously your role as stewards of Metro's transit needs and interests. Our intention is to work with you to ensure that the proposed development addresses both Metro and local community objectives. In doing so, we look forward to working cooperatively with WMATA and the developer.

We note that both the City of Takoma Park and the DC Advisory Neighborhood Commission 4B, composed of elected officials who represent more than 35,000 residents, are opposing the current design and are calling on the WMATA Board to address and resolve the community's concerns prior to the signing of a Joint Development Agreement with the developer. The following three areas are of greatest concern to DC/MD Neighbors for Takoma Transit:

- Neighborhood Compatibility. We are particularly concerned that the currently proposed development is not compatible with the neighborhood in terms of height, massing, setback, and design. In addition, we are concerned with its potential impacts on traffic, parking and the surrounding infrastructure. Any new development should add value to our community.
- Transit-Oriented/Accessibility Concerns. We want to work with you to ensure that this (or any other development at this site) is designed to be transit-oriented and friendly for pedestrians and cyclists. We are determined that the site be easily accessible to the elderly and people with disabilities.
- Green Space Preservation. We also want to ensure that the existing green space adjacent to the station is maintained in perpetuity as a park and as a buffer between the transit activities and the surrounding neighborhood.

Following is a detailed discussion of the various issues our group has identified as needing resolution, while meeting WMATA's, the developer's, and our neighborhoods' goals. We have sought and gained the support of many of our neighbors, through dissemination of information about the development.

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We would like to discuss these issues with you and to meet with you at the site itself, so that together we can address the impact of the development on transit needs and the community.

COMPATIBILITY OF PROPOSED DEVELOPMENT WITH COMMUNITY SETTING

Height and Massing. We are particularly concerned that the height and massing of the proposed development are not compatible with the character and scale of the adjacent apartments in DC or the single family homes across Eastern Avenue in Maryland. Resolving the problems with the proposed design cannot be achieved through the kinds of changes which typically occur during the PUD process.

The most recently proposed design for the development would result in a massive building effectively five stories (about 53' high) along Eastern Avenue (including the mezzanine level), and approximately 75' high at the west façade. Such a structure would be far beyond the current zoning limits (see below), and would overshadow the adjacent single family houses, low rise apartment buildings and condominiums. The excessive height of the building would also result in problematic shadow conditions affecting traffic movement during rush hours.

The one-story step-up just 8' back from the Eastern Avenue façade is ineffective in reducing the massing impact on the adjacent neighborhood. It is important to take into consideration that the Eastern Avenue façade will be viewed not only from the street, but also from neighboring residences and by people walking, biking or driving down the hill on Eastern Avenue.

In order to become reasonably compatible in scale and massing with its neighbors, and with traffic patterns, the proposed structure should be no higher than 3 stories (i.e. around 30 feet) at the Eastern Avenue façade. In addition, there are other design possibilities that could better relate to the existing community, as well as providing improvement in the exterior orientations of the proposed individual apartment units.

Zoning laws regarding height of development. In addition to the incompatibility of the scale and massing with the neighborhood, the proposed design does not adhere to DC zoning laws with regard to height. At Eastern Avenue, in Zone R-5-A, 40' is the height limit, while the building plans show heights of approximately 50' and 75' within that area. The rest of the site is zoned C-2-A, which limits height to 50', while the proposed design shows a height of approximately 75'.

Setback from Eastern Avenue. The proposed setback from Eastern Avenue is insufficient and incompatible with the community. It falls far short of the curb-to-building-line dimensions across the street (40 feet) and those of adjacent apartments (about 50 feet).

Takoma Central District Plan Guidelines. The development as proposed does not meet the criteria detailed in the Takoma Central District Plan, adopted by the DC Council in 2002, which repeatedly emphasizes the desirability of development at a scale compatible with the community to "preserve and enhance Takoma's small town/village character." It specifies a height limit of 4 stories for all new development, and 65-95

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residential units “to match existing neighborhood scale” (p. 7). The current proposal is more than twice the upper limit set in the Plan for residential units (p. 52).

50-foot-buffer. The Takoma Central District Plan recommends a 50-foot or greater landscaped buffer between the station’s transit functions and existing residential use, including the garden apartments and the Eastmont Cooperative Community (54 homeowners) on Eastern Avenue (p. 52). The current plan provides for no buffer at all, but instead shows three parking access lanes sandwiched between the proposed building and the driveway of the adjacent apartment building.

We are concerned that the proposal deviates significantly in several key areas from the Central District Plan, without any public discussion or indication in the planning materials of the extent to which the various components of the Plan were considered, modified or discarded. We believe it is essential that the WMATA Board correct these glaring problems before taking any votes, and that this flawed proposal should not be presented at a public hearing.

The design of the development is environmentally unfriendly. The location of the building’s loading docks, which are proposed to be accessed from Eastern Avenue, exposes the surrounding neighborhood (and possibly also the front entry to the building and its primary public elevator) to the odors and noise of trash and delivery trucks. This also raises safety questions for pedestrians and cyclists moving to and from the Metro entrance.

The proposed design makes no reference to inclusion of green roofs or other environmentally friendly aspects that might benefit both residents and the neighborhood. The courtyards and the pool are oriented such that direct sunlight would be extremely limited, and both courtyards are adjacent to the main bus traffic and bus idling lanes, and subject to the resulting exhaust and noise.

IMPACT OF TRAFFIC ON TAKOMA DC AND TAKOMA PARK, MD.

Eastern Avenue is already congested. Ride-On buses regularly travel on Eastern Avenue. Emergency vehicles (fire trucks and ambulances) rely on the street for access to the Metro area and beyond. Eastern Avenue is presently the proposed eastern alignment for the Metropolitan Branch Bike Trail that stipulates the removal of parking on Eastern Avenue, on which the current residents rely. In addition, it is the only route for cars coming to the Metro to park, or drop off/pick up passengers (there is no official kiss and ride on Cedar at the underpass).

To ensure that Metro’s transit needs and the community’s need are met, it is critical that Eastern Avenue continue to function effectively as a primary route. Yet Eastern Avenue is a narrow street (only 26 feet from curb to curb), and thus poses particular challenges that must be taken into consideration by any development. These challenges include the following:

- In the proposal, the building's loading docks open onto Eastern, meaning that trucks, including trash trucks, would be backing across the Eastern Avenue

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sidewalk and halting traffic, probably in both directions, daily. This would not only add to the congestion of this key route, but it is a clear safety hazard for automobiles, cyclists, and the many pedestrians who use the Avenue to access Metro.

- The entire right-of-way for Eastern Avenue is only 40 feet. Between the 26-foot roadway and two sidewalks, there is no spare right-of-way for widening, and retention of sidewalks on both sides of the street is vital for safety, given the high vehicular and pedestrian traffic volumes.
- It is critical to maintain the very limited on-Avenue parking for the garden apartments and the Eastmont Cooperative.
- Currently, the signaled intersections at Cedar/Carroll and Piney Branch/ Eastern fail during rush hour to clear traffic in one light cycle, causing back-ups. Traffic flows onto Holly, Cedar and Tulip in Takoma Park MD, which are even narrower than Eastern. In addition, on weekday mornings one or more buses are often parked on Cedar Street across from the Seven-Eleven – evidently because there is insufficient bus bay space at the station – a practice which often causes undue delay at the traffic light leading onto Carroll Street.

WMATA's Traffic Impact Study. WMATA's Traffic Impact Study is fundamentally flawed, as it fails to take into consideration specific ongoing and planned development within a third of a mile of the Metro site. These projects include the following:

- Takoma Central (150 residential units, 9,000 sq. ft. restaurant); estimated to be ready for occupancy in April/May of 2014; restaurant opening estimated for late summer 2014.
- 7501 Spring Place (approximately 142 residential units); approved.
- Takoma Theatre (22 residential units); in design phase.
- Douglas Development apartments on Maple Avenue adjacent to CVS (approximately 100 residential units); approved.
- 6856 Eastern Avenue (redevelopment of underused commercial property with 162,000 sq. ft.; under construction.
- 6896 Laurel Street (redevelopment of former theological seminary, over 70,000 sq. ft.; completion date unknown.

Each of these projects will generate traffic on Eastern Avenue, Carroll Avenue and Cedar Street and surrounding streets. Most, if not all, will be completed *prior* to the time the Metro site project would be finished.

The specific impact of these nearby projects on these streets could have been estimated using the ITE Trip Generation Manual, as was done with respect to the Metro project. Such an estimate would have produced a much more realistic assessment of the contribution of the Metro project to area traffic, instead of the assumption of an unrealistic traffic growth rate of only two percent per year for all streets.

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Even using the current unrealistic baseline growth of traffic, the study clearly shows that the project would have a significant effect on a road network already at capacity. For example, the nearby intersections of Eastern/Holly and Eastern/Piney Branch would see their Levels of Service fall from B to C and from C to D respectively during the rush hour. This will lead to blockage of the Eastern/Holly intersection at a minimum. Using a more realistic traffic baseline that takes into account ongoing and planned area development, the Levels of Service would certainly be lower, likely causing backups all the way to the parking access road, creating gridlock for Metro commuters.

An additional flaw of the analysis is its failure to account for the siting of the project's loading docks on Eastern Avenue. Servicing the proposed building from Eastern would result in a routine disruption of traffic, caused by the flow of trucks backing onto the property.

Ensuring adequate parking for Metro users: WMATA characterizes current parking availability at the Metro station as “underutilized.” DC-MD Neighbors agree that on weekdays the parking lot at the Takoma Metro **appears** to be underutilized. However, it is important to note that the restricted hours purposely discourage commuters – a result which we support.

Unfortunately, the current system also greatly limits usage of the lot by all Metro users. The restricted hours mean that only about 50% of the lot is available at any one time. On weekdays, one section of the lot allows 7-hour parking between the hours of 8:30 AM and 3:30 PM, and again from 7 PM until 2 AM. Parking is banned between 3:30 and 7 PM, and from 2 AM to 8:30 AM. Another section of the lot bans weekday parking from 2 AM to 10 AM. These limitations are why the parking appears “underutilized.”

While these unconventional hours discourage commuter use of the parking lot – again, a result which we support -- it also discourages people from using the parking lot for shorter trips into town for meetings, appointments, sight-seeing and evening outings.

A simple solution – which would lead to more usage of Metro – would be to allow for parking in any space for a 7-hour stretch. This would make work-related parking (typically a 9-hour period) virtually impossible, but allow for a greater use of Metro for short periods of time. The Metro parking plan should also facilitate use of the Metro, and should support shopping and dining in our Old Takoma businesses. WMATA should consider an alternative payment system, such as the Smartrip card/credit cards/parkmobile phone apps now used in DC.

On weekends, when parking is unrestricted, the lot is often full or close to full, indicating that there is substantial demand for this parking. The increase in apartment units in the near future (not including the Metro units) is bound to increase the use of the parking lot by non-commuters on week-days as well.

Although we believe that people should be encouraged to walk, bus, or bike to the Metro, not everyone can do that every time, and the growing, and aging, population in our area will increase the need for non-commuter parking. Yet, the proposed development reduces the number of public parking spaces at the Metro station from 153

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to 98, a 36% reduction¹. This reduction must be reconsidered. The development should not sacrifice non-commuter parking at the Metro for current or future transit users in order to provide parking for new residents of the planned development, especially considering that many current residents chose to live in the neighborhood based at least in part on Metro accessibility with parking.

TRANSIT-ORIENTED/ACCESSIBILITY ISSUES

Pedestrians, particularly the elderly, persons with disabilities, and adults with babies and young children, must have easy and safe access to the Metro station and the elevator to the platform.

Improving current station functioning. The development as currently proposed does not address the Metro station's shortcomings, which have become obvious since it was constructed. Redevelopment, especially when it is of the scale contemplated in this instance, is a unique opportunity for WMATA to review the current functioning of the site. Once development as substantial as this occurs, opportunities to improve the site are likely to be more complicated and even precluded altogether. It is unfortunate that this development includes no improvements to the core function of the site as a transit center, as part of a holistic approach consistent with smart growth principles of efficient land use at high density critical locations.

There are two obvious improvements which would unquestionably improve the core function of this station. The first is to include extension of the elevator tunnel to the West. This extension would increase access significantly for pedestrians coming from the District, especially for those with disabilities.

The second is to address the poor rail-bus interface of the site. It should be noted that this station has a large population that accesses the Metro station by bus and must now walk unnecessarily long and uphill distances. This is particularly onerous for seniors and people with disabilities.

Pedestrian safety. DC-MD Neighbors are concerned about the safety of everyone using the walkways. The proposed traffic pattern diagram presents pedestrians walking at one stretch next to three lanes of traffic (this may depend on where the parking ramp starts), and at another stretch sharing a walkway with cyclists, next to the buses. In the first example, some form of barrier is needed to protect pedestrians, and in the second case, the walkway must be wide enough for a bicycle lane and pedestrians.

Walkways must be well-lit in order to ensure the safety of pedestrians and cyclists.

Bicycle access. The plan has no meaningful accommodation to facilitate bicycle access from Eastern Avenue. It appears to show cyclists sharing a walkway with

¹ The proposal incorrectly states that there are currently 144 non-kiss and ride spaces, whereas the actual number as laid out is 153.

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pedestrians and those exiting buses. A dedicated bicycle lane, from the Eastern Avenue entrance to the Metro entrance, is necessary to ensure pedestrian and cyclist safety.

PRESERVATION OF GREEN SPACE

As previously mentioned, we are dedicated to the preservation of the green space adjacent to the bus bays. Development on both sides of the MD/DC line has already reduced green space in the area to almost nothing. The Takoma Green (proposed name) provides a significant buffer between the Metro facility and the surrounding neighborhood. We thus support the current plan showing full retention of the Green, and would expect that this Green be permanently set aside as an official park, and not be subject to development in the future.

CONCLUSION

Again, we know that, as Metro Board members, you take seriously your roles as stewards of Metro's transit needs and interests. We would like to support you in your work – and in finding ways to make sure that this development addresses Metro's and the community's needs.

As noted above, we would appreciate the opportunity to meet with you to speak in more detail about our concerns – and our hopes – for this development. We reiterate the necessity for the WMATA Board to correct the proposal's multitude of problems before taking any votes, and we further emphasize that this flawed proposal should not be presented at a public hearing without substantial revisions.

We again extend an invitation to you to tour the site with us so that you can more fully appreciate the unique space that is the Takoma Metro site – and thus what kind of development would make WMATA, Takoma DC, and Takoma Park, MD proud.

We will be back in touch with you soon to propose a time for you to join us for further discussion and a tour of the site.

Thank you,

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