From: writtentestimony

Sent: Monday, March 02, 2015 4:24 PM

To: writtentestimony

Subject: FW: Public Comment on Takoma Metro Station Public Hearing Staff Report, Docket R14-01

From: Joseph Radzievich [mailto:josephradzievich@hotmail.com]

Sent: Monday, March 02, 2015 4:21 PM

To: writtentestimony **Cc:** Joseph Radzievich

Subject: Public Comment on Takoma Metro Station Public Hearing Staff Report, Docket R14-01

March 2, 2015

Dear WMATA Board of Directors and WMATA Staff,

Please note I have submitted earlier written comments to the WMATA staff report (Docket R14-01) concerning the proposed WMATA Takoma metro development. These written comments were incorporated in a group letter my neighbors and I wrote and this group letter has already been submitted to you.

Similar to the group letter, I request that the WMATA Board of Directors withhold their vote on this project until further information is provided and specific conditions are met.

The WMATA staff report incorrectly stated that there is no parkland on the site when there is in fact substantial public green space on the site. Further, the WMATA board should withhold their vote on this project until the developer and WMATA staff develop a green space management plan which includes perpetuity protection for the green spaces which exist on this site.

As stated in the group letter, WMATA and the developer should meet the following conditions prior to any vote to approve this project:

- 1. 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.
- 2. 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.

Sincerely, Joseph Radzievich 7050 Eastern Ave NW 201-B Washington, DC 20012

From: Reiser, David A. <DReiser@zuckerman.com>

Sent: Saturday, January 31, 2015 8:18 AM

To: writtentestimony

Subject: Takoma Metro Development

First, I find it quite remarkable that you think the additional traffic load from the planned development is inconsequential because the traffic is already heavy, even before the opening of the Takoma Central development on Carroll Avenue and the 102 unit development on Willow Avenue. Carroll Avenue is now typically gridlocked during rush hour. Adding more traffic to an already failing infrastructure is--to put it mildly, unwise. Carroll, Eastern, and Piney Branch are inadequate for the existing load. This is not only a problem for commuters, but also for anyone who has to get to and from the area (e.g., plumbers, electricians).

Second, District of Columbia zoning review is not an adequate process to address the cross-border impact of the proposed development on the Takoma Park, MD historic district. Because the Metro tracks are a significant neighborhood dividing line, the impact on the Maryland side will be much greater than on the DC side (where we used to live). Because WMATA is multi-jurisdictional, it is the appropriate forum to consider these impacts, even if they may also play some role in the District's zoning review process. As a public agency, WMATA has a responsibility to take harm to the surrounding community into account when it considers disposition of real property.

Third, the area does not have the commercial development, particularly a full-service grocery store, needed for "life within walking distance."

The staff report reflects incomprehension of real world conditions or irrevocable bias in favor of the EYA proposal.

David Reiser 7211 Maple Avenue Takoma Park, MD 20912

From: Megan Scribner <mscribner@starpower.net>

Sent: Monday, March 02, 2015 12:05 PM
To: writtentestimony; Megan Scribner

Subject: Letter in regard to: Docket No. R14-01:, Proposed Changes to WMATA Facilities at Takoma

Metro Station

Attachments: March 2, 2015 Letter to WMATA Board.docx

My letter is both below and attached.

Thank you,

Megan Scribner

March 2, 2015

Dear WMATA Board Members:

My name is Megan Scribner, I live at 7321 Willow Avenue in Takoma Park, Maryland. I agree and add my signature to the DC-MD Neighbors for Takoma Transit's letter below.

I have three points to add to the letter:

Parking: The development reduces Metro user parking based on the assumption that the parking lot is currently underutilized. But the reality is that the odd patch work of restricted hours of parking mean that only about 50% of the lot is available at any one time. (You should have someone on your staff review all the odd restrictions – it is often difficult to figure out when and where it is legal to park at the Metro.)

The restricted hours do discourage commuter use of the parking, as they were intended, but they also discourage people from using Metro for meetings, appointments, sight-seeing and evenings out. There is no parking between 3-7:00pm – primary hours for those, like myself, who want to use Metro for going out at night. We want to use Metro – but also to use the parking lot – so that we can avoid walking home after dark. But since the parking is not available during these hours, we often drive all the way into downtown DC rather than take Metro. We would rather park – and not pollute – but have no choice. This is costly to the environment – and to Metro as you lose out on the parking fees that we would be paying for parking during the evening/night.

On weekends, when parking is unrestricted, the lot is often full indicating that there is substantial demand for this parking.

A simple solution would be to allow for parking in any space for any 6-7-hour stretch. This would eliminate commuter parking (which typically needs a 9-hour period) and lead to increased ridership.

WMATA also needs to provide an alternative payment system, such as the Smartrip or credit cards. Currently to park for 6 hours, one must bring 24 quarters.

Although people should walk, bus, or bike to the Metro, not everyone can or will do that every time. If there is not adequate parking available at the station many people will end up driving and not using Metro. There is a need for these spaces. WMATA should improve not remove or reduce public parking at the Metro.

Tour of the Site: To adequately judge whether this current development is appropriate for the site, it is crucial that each of you visit the site. It is only after taking a tour of the site – with the details of the plan in hand – that you can get a sense of the true impact of the design and what parts are reasonable and what parts are not. For instance, I believe once you see how narrow Eastern Avenue is (26 feet), you will have second thoughts about all the traffic and other uses (loading dock etc.) that are proposed for that street. Likewise, I believe the size of the development – way out of proportion to all other developments in the area – will come home to you.

To act in good faith to the transit needs of Metro, the needs of the community and future generations, you need to see the reality of what is being proposed. I urge you to join us on a tour of the area, where we together can understand and explore the impact of this development.

With that understanding, I believe that the community, WMATA and the development can better envision what would work for the site.

One last thought: I have lived in Takoma Park for 19 years. In those years, to my knowledge, there is only one other development that the community has fought. In that case, and in this one, the issue that makes it stand out from all the many developments that have proceeded without conflict – is size. The development is too big for the site. All the other developments that have come in and been successful – both in being built without conflict and in being profitable – have been a size that fits the area. If this development was smaller in scale many of the issues would be resolved and the community could get behind it.

Best,

Megan Scribner

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 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:

- o 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
- o The historic town center of which this is an extension
- o The elevated metro tracks
- o 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:

- 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

ъ.	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 tr	uly yours,
Sara Gr	reen, on behalf of
DC MD	Neighbors for Takoma Transit
Jacquel	line Davison
Sabrina	a Eaton
Pamela	a Ellison

Linda Gray		
Faroll Hamer		
Sara K. Hayden		
Peter Kovar		

Lorraine Pearsall

Joseph Radzievich

Faith Wheeler

Peter Feiden

From: Steve Shapiro <steveshapiro1@juno.com>

Sent: Monday, March 02, 2015 4:10 PM

To: writtentestimony

Cc: pcellison22@yahoo.com; takomametro@gmail.com

Subject: Proposed Changes to WMATA Facilities at Takoma Metro Station

Dear WMATA,

I am a Takoma Park resident. I endorse the DC-Maryland Neighbors for Takoma Transit comments below.

Thank you.

Steve Shapiro Willow Avenue Takoma Park, Md 20912

----- Forwarded Message -----

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 â€æstreet,†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 â€" it is the full size of a typical Takoma Park block â€" 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 (45'8â€) 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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- o 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 $\hat{a} \in \text{ce}$ eyes on the street, $\hat{a} \in \text{ce}$ 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.

 Direct the developer to provide appropriate contextual drawings, sections, elevations and three- dimensional models to the community, along with alternative designs;
 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.
 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

From: jps@margreta.com

Sent: Sunday, February 01, 2015 1:46 PM

To: writtentestimony

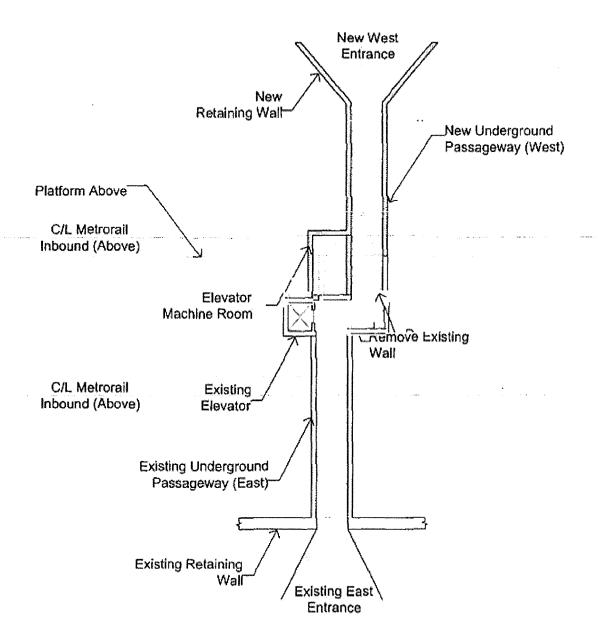
Subject: Comment on the Takoma Public Hearing Staff Report

Attachments: 2006 Western Entrance Proposal with Jog.jpg

On page 16, the Takoma Public Hearing Staff Report used a 2006 study to estimate that completing the tunnel accessible/bicycle tunnel under the tracks would be too expensive. That study said that the tunnel was costly because of the location of the elevator machine room. My verbal testimony was mangled in transcription, but in my written testimony, I (writing on behalf of Seekers Church) I suggested a "Jog" around the machine room. I also included a mock-up, also attached, of how that might look.

I submit that the feasibility of a tunnel that leaves the machine room in place be examined before rejecting the proposal because of the cost of moving the machine room. This is an opportunity to finance opening up the bicycle entrance to the trail, as called for in DC's Central District Plan which was passed unanimously by the DC city council. Furthermore, a through tunnel would provide handicap access to new residential development on the western side of the tracks, such as the 150 units planned for Spring Place.

-- Jeffrey P. Silverstone



OPTION 3b - LOWER LEVEL ELEVATOR ENTRANCE CONCEPT PLAN

With Jog to Avoid Relocating Machine Room

WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY / DIVISION OF PLANNING, DEVELOPMENT, ENGINEERING AND CONSTRUCTION / OFFICE OF BUSINESS PLANNING AND PROJECT DEVELOPMENT

From: Sent: To: Subject:	Chris Simpson <simpson.chris123@gmail.com> Monday, March 02, 2015 4:18 PM writtentestimony R14-01 - Comments on Public Hearing Staff Report dated January 2015</simpson.chris123@gmail.com>				
	The second of th				
March 2, 2015					
WMATA					
Office of the Secretary					
600 Fifth Street, NW					
Washingon, 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	f Report Now				

Allow Neighborly Talks to Continue With the Developer

The staff report fails to resolve significant issues raised by the majority of commenters. I urge you NOT to

once the deal has been made. Your leverage is before you make a deal." (Hearing Transcript, page 28).

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

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,

Christine Simpson

7300 Cedar Avenue

Takoma Park, MD 20912

From: Marcie Stickle/Geo French <marcipro@aol.com>

Sent: Saturday, February 28, 2015 4:58 PM

To: writtentestimony

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

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

We have been extremely active in testifying, attending and participating in work sessions and all meetings since we first heard about Takoma Station development plans, where 98 townhouses with 2-car garages were first proposed, dating back many years. We recently attended and participated in 2014 EYA's work session and 2014 WMATA's recent hearing. Not much has changed based on our comments at these meetings and we stand by these desires and testimonies that are on record.

We however feel we can support the letter by **DC - MD Neighbors for Takoma Transit**, dated February 23, 2015 (below). Although it is not as strong as we would like in supporting the preservation of the entire green tree grove buffer between the first garden apartment and the WMATA parking lot along Eastern Ave, it is very good in all other aspects in working with the stakeholders to strive for the best possible outcome in getting an exceptional project. Hopefully one that will not reflect the problems that have plagued the Sarbanes Transit Center in Silver Spring.

Sincerely, George French, 510 Albany Ave., Takoma Park, Md 20912, 301-585-3817 Marcie Stickle, 8515 Greenwood Ave., Takoma Park, Md. 20912, 301-585-3817:

Green Space in Perpetuity: Celebrate a Green Theme, a Human-Scale, Garden-City/Apt. Theme, In Harmony With Nature!

Presented by Marcie Stickle, Regular Takoma Park Station Metro User;

WMATA Hearing, 6/18/14, **Docket R14-01**

Maples, Magnolia, White Pines, Beech, Elms, Huge White Oaks, Willow Oaks, Golden Rain Tree, Honey Locusts, Hollies, Chestnuts, Bald Cypress, Weeping Willow, create the cool, lovely, fragrant soothing green Grove adjacent to the Garden Apts on Eastern Ave. Celebrate a Green Theme, a human-scale Garden City/Apt. theme; the Grove as the Centerpiece to new development.

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
- o The garden-style apartments adjoining the north boundary
- o 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
- o The topography of the site, which exists in a bowl
- o 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.