



Historic Takoma, Inc.

"Preserving the Heritage of Takoma Park-MD and Takoma-DC"

Additional Comments of Historic Takoma, Inc. WMATA Compact Public Hearing Docket R14-01 June 30, 2014

1. WMATA must provide to the public the actual final Site Plan for the Takoma Station approved by the WMATA Board in 1974-1975.

In a letter dated April 12, 2000, attorneys for Historic Takoma and the City of Takoma Park requested the final site plan of the Takoma Station approved by the WMATA Board in 1974-1975. To date, this plan has not been provided by WMATA. Site plan approvals carry regulatory weight and should be in the record and must be made available for public review and comment before WMATA makes any decision or moves further forward. We again request that you now make this document publically available because of the important information it contains. (See attached letter dated April 12, 2000).

2. The proposed concept is not compatible with either the DC or Maryland Takoma Park National Register Historic Districts, which are negatively impacted by the proposed concept due to its excessive height, overall excessive scale and massing, improper setbacks, density, and removal of green buffers with mature trees, a narrow street and problematic infrastructure, traffic issues.

We ask that WMATA make substantial modifications and reductions to the proposed development before proceeding further. In addition, the WMATA Board must defer further action and table its consideration of the proposed development at the Takoma Park Metro Station until such time as the FTA has completed its statutory obligations to review the project pursuant to Section 106 of the National Historic Preservation Act and Section 4(f) of the Department of Transportation Act. (See attached letters from Cultural Heritage Partners, the Law Office of Michele Rosenfeld, and the National Trust for Historic Preservation).

3. WMATA must insure that a comprehensive environment impact analysis is conducted for the proposed plan as required under NEPA and the Compact itself, and the proposed loss of existing green space and mature trees next to the closest Eastern Avenue low income apartment building brings the issue of environmental justice forward for serious consideration. All of the green space at the station is critical to preserve and enhance, and such green space and trees are needed by all residents regardless of income.

4. A review of the history of the existing green buffer park areas with mature trees indicates that they were purposefully created with much regulatory planning and process, and as such they are defining

P.O. Box 5781, Takoma Park, MD 20913
7328 Carroll Avenue, Takoma Park MD 20912
www.HistoricTakoma.org

elements in the Takoma Park National Register –listed Historic District in DC. These green areas also affect and enhance the adjoining Takoma Park National Register-listed Historic District in Maryland. (See attached Historic Takoma letter and report dated March of 2000: The History of the Park at the Takoma Metrorail Station).

5. The development is inconsistent with the District of Columbia’s Central District Plan in at least three material respects: increased density, increased height, and multifamily rather than townhome use. WMATA’s action should be deferred until either the development is redesigned to be consistent with the Comprehensive Plan, or the Comprehensive Plan is revised with due public process. (See letter from Michele Rosenfeld dated March 27, 2014. and its attachments).

6. An independent review has found that the traffic study performed by WMATA significantly underestimated traffic impacts of the EYA development, is inconsistent with industry standard practices, and should be redone before the project moves forward. (See attached letter from Michele Rosenfeld dated March 27, 2014 and its attachments).

7. WMATA has significantly violated his own Joint Development Policies and Guidelines on sound growth with respect to the project’s excessive density, height, scale and massing, flawed setbacks, flawed traffic analysis, loss of green space with mature trees.

8. WMATA has significantly violated its own Joint Development Policies and Guidelines with respect to working collaboratively with local jurisdictions. Outreach to the City of Takoma Park and the general public was wholly inadequate, with only one public meeting in July of 2013. A request to WMATA to meet with Historic Takoma and near-in neighbors to discuss concerns was refused. Drawings provided as part of public documents were often not legible. If outreach and collaboration were done well, the resolutions in opposition to this project from both the ANC 4B and the City of Takoma Park, also attached in this package, would not have been necessary.

Sincerely,



Lorraine J. Pearsall
Historic Takoma, Inc.