



**National Trust for
Historic Preservation**
Save the past. Enrich the future.

June 30, 2014

Mr. Tom Downs, Chairman
Washington Metropolitan Area Transit Authority
600 Fifth Street NW
Washington, DC 20001

Re: Takoma Park Metro Station Development Proposal
Docket No. R14-01, WMATA Public Hearing June 18, 2014

Dear Mr. Downs,

I am writing on behalf of the National Trust for Historic Preservation,¹ to comment on the proposed residential development project at the Takoma Park Metro Station. I had registered to speak at the public hearing convened by the Washington Metropolitan Area Transit Authority (WMATA) on June 18, 2014, but I was not able to attend the hearing after all, so please consider the National Trust's comments as reflected in this letter.

The Proposed Project Would be Incompatible With the Character of the Takoma Park Historic District, and Thus the Project Does Not Meet the Requirements for Approval by the D.C. Historic Preservation Review Board.

The proposed development would include a massive apartment building with 212 apartments, which would reach as high as 77 feet in height (in an area currently limited by zoning to 50 feet in height). The proposed new construction would be entirely within the District of Columbia's Takoma Park Historic District, which is listed in the National Register of Historic Places, and thus subject to review by the D.C. Historic Preservation Review Board. In addition, the project will adversely affect Maryland's Takoma Park Historic District, which is also listed in the National Register, and is immediately adjacent to the proposed development, across Eastern Avenue.

¹ The National Trust for Historic Preservation in the United States is a private nonprofit organization chartered by Congress in 1949 to promote public participation in the preservation of our nation's heritage, and to further the historic preservation policy of the United States. See 16 U.S.C. § 468. With more than 750,000 supporters around the country, the National Trust works to protect significant historic sites and to advocate historic preservation as a fundamental value in programs and policies at all levels of government. The National Trust is headquartered in Washington, DC, and owns or operates a number of Historic Sites open to the public, including three in Washington, DC. One of these Historic Sites—President Lincoln's Cottage—is located just 2½ miles from the Takoma Park Metro Station.

D.C. Code § 6-1107(f) prohibits the approval of a new construction project within a designated historic district if “the design of the building and the character of the historic district . . . are incompatible.” In this case, the incompatibility is glaring.

The DC *Design Guidelines for New Construction in Historic Districts* require that the analysis of compatibility should consider a dozen different design principles: Setback, Orientation, Scale, Proportion, Rhythm, Massing, Height, Materials, Color, Roof Shape, Details and Ornamentation, and Landscape Features. (See <http://planning.dc.gov/DC/Planning/Historic+Preservation/Maps+and+Information/Policies+and+Procedures/Design+Guidelines/New+Construction+in+Historic+Districts>.) In this case, the proposed new construction is *incompatible* with the character of the Takoma Park Historic District under virtually every single one of these design principles. The most egregious areas of incompatibility are the proposed Scale, Proportion, Massing, and Height of the enormous proposed structure. In addition, Setback and Landscape Features are also issues that present an especially high degree of incompatibility.

The Potential Adverse Effects of the Proposed Project Outweigh any Potential Public Benefits, and Thus the Project Does Not Meet the Requirements for Approval by the D.C. Zoning Commission.

In addition to review by the D.C. Historic Preservation Review Board, the D.C. Zoning Commission would have to find that the proposed Planned Unit Development (PUD) is consistent with the Comprehensive Plan. 11 DCMR § 2403.4. The Commission must also find that “[p]ublic benefits are superior features of [the] proposed PUD,” and that they would “benefit the surrounding neighborhood or the public in general to a *significantly greater extent* than would likely result from development of the site under the matter-of-right provisions,” *id.* § 2403.6 (emphasis added). The Commission must also be satisfied that the benefits are not outweighed by the potential adverse effects of the project. *Id.* § 2403.8. In our view, this proposed development does not meet those requirements.

The mandatory review by the D.C. Historic Preservation Review Board and the D.C. Zoning Commission, and the stringent standards applicable to those reviews, could well require significant modifications to the project in order to reduce its incompatibility with the historic district and to reduce its adverse effects, which substantially outweigh any public benefits under the current plan.

Federal Transit Administration Concurrence Requires Prior Compliance with Section 106 of the National Historic Preservation Act and Section 4(f) of the Department of Transportation Act.

In addition to these reviews under D. C. law, the proposed development project is also contingent on receiving prior concurrence from the Federal Transit Administration (FTA), because the property on which the development would be located was purchased with federal transit funds. 49 U.S.C. § 5302(a)(1)(G); 49 C.F.R. § 18.31.

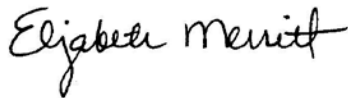
Although the FTA did concur in a previous development plan for this site on March 24, 2009, the project currently under review is substantially different in character and scope,

and would have more severe adverse impacts on both the Takoma Park Historic District in D.C. and the Takoma Park Historic District in Maryland. The revised conceptual design of the project would be double the height of the project previously reviewed by the FTA, and would include more than double the number of residential units. These changes will cause substantially more severe impacts on the character of the surrounding historic neighborhoods.²

The National Trust has already communicated directly with the FTA regarding this project, and we have emphasized the FTA's responsibilities for compliance with Section 106 of the National Historic Preservation Act, 16 U.S.C. § 470f, 36 C.F.R. Part 800, and Section 4(f) of the Department of Transportation Act, 49 U.S.C. § 303(c), 23 C.F.R. Part 774, prior to making a decision on whether to concur in the revised plan for the project.

In conclusion, we urge WMATA to make substantial modifications and reductions to this proposed development before proceeding any further, in order to reduce the severe adverse effects of the project on the Takoma Park Historic Districts in D.C. and Maryland. We appreciate your consideration of the National Trust's concerns about this proposed project.

Sincerely,



Elizabeth S. Merritt
Deputy General Counsel

cc: Anne Brockett and David Maloney, DC Historic Preservation Office
Tim Tamburrino, Maryland Historical Trust
Jay M. Fox, Regional Counsel, FTA
Elizabeth Patel, Federal Preservation Officer, FTA
Chris Wilson, Charlene Vaughn, and Reid Nelson, ACHP

² We note also that the proposed development would reduce the number of parking spaces for the Metro by one-third, leaving only 95 metered spaces. (The claim that the current Metro parking at Takoma Park is underutilized seems largely due to self-imposed restrictions and prohibitions that make much of the parking unavailable.)