



January 14, 2014

The Hon. Mel Franklin, Chair  
Prince George's County Council &  
Elizabeth Hewlett, Esq., Chair  
Prince George's Planning Board  
Office of the Clerk of the Council, Room 2198  
County Administration Building  
14741 Gov. Oden Bowie Drive  
Upper Marlboro, MD, 20772

RE: Joint Public Hearing: **OPPOSE** Prince George's CR-139-2013 - Proposed amendments to the Adopted Southern Green Line Station Area Sector Plan and Endorsed Sectional Map Amendment to create a Development District Overlay Zone ("DDOZ"); Incentivize TOD

Dear Chairs Franklin and Hewlett:

Please accept these comments on behalf of the Coalition for Smarter Growth (CSG). The Coalition for Smarter Growth is the leading organization working locally in the Washington, D.C. metropolitan region dedicated to making the case for smart growth. Our mission is to promote walkable, inclusive, and transit-oriented communities, and the land use and transportation policies and investments needed to make those communities flourish.

Regrettably, the Coalition for Smarter Growth expresses its opposition to the proposed amendments to the Adopted Southern Green Line Station Area Sector Plan and Endorsed Sectional Map Amendment. While we have testified in support of many helpful bills and resolutions that advance the County's efforts to attract high quality investments around its Metro stations, we regret that this proposed overlay, while well-intentioned, is likely to do more harm than good. We agree with the intent of the proposal: to attract higher density, higher quality development close to the Southern Green Line Metro stations, to foster a mix of uses that provide convenient retail options for residents, and discourage automobile-oriented land use patterns. However, the proposed amendments, absent careful analysis, may thwart these objectives through instituting a rigid set of requirements that could turn away development that might build up a stronger market to achieve our TOD goals.

The Branch Avenue Metro station minimum density requirement of 2.0 FAR is a good goal, but as a requirement, it could backfire and discourage investment that needs phasing of different levels of intensity of development over time. The long list of use prohibitions may also be too rigid for fostering the variety of retail you hope to create over time. While some are less desirable, some uses – like nail salons -- may fill space that might otherwise sit vacant. Over time, a broader mix of uses may replace some of these uses, or coexist with them. The larger problem of too much land zoned for commercial use needs a more systematic approach.

We recommend a carrot rather than a stick approach to achieving the higher density TOD we all seek. Current land values do not support the kind of development you want, but county money through TIFs and other incentives, could bridge the gap. Similarly, working more closely with GSA to bring in a federal tenant, as was identified in the sector plan, would be the catalyst needed to attract more private sector investment with greater densities and higher quality retail.

Rather than taking this micromanagement approach to land uses around the Southern Green Line Metro stations, we recommend supporting the effort underway to update of the county's woefully outdated zoning code. The Planning Department will include a thorough analysis of standards for Metro station areas as a part of this process, including appropriate standards for height, FAR, and uses. This effort will draw on best practices from around the country to replace the county's old, dysfunctional ordinance with a new state-of-the-art one. Without the benefit of a more detailed analysis, and understanding of best practices, we caution against adopting the proposed overlay.

Successful suburban transit-oriented centers are built with a range of heights and densities, and are not built by fiat. Downtown Silver Spring, for example, has a mix of low, mid and high rise buildings. The core pedestrian-oriented commercial street, Ellsworth Avenue, is the heart of the Silver Spring renaissance. This street is flanked by new two story buildings. These buildings would be prohibited under the proposed amendments for the Branch Ave. Metro station. Would Silver Spring still be waiting for a vibrant, pedestrian-oriented retail street if it were subject to similar restrictions?

The Southern Green Line Station Area planning effort was done through an extensive public process that included a cross-section of stakeholders on an steering committee (on which I served), a variety of community outreach sessions, and was supported by a set of top notch consultants covering economic development, transportation, urban design, planning and related fields. The extensive effort was made possible from a HUD Community Challenge grant. We are concerned that the poorly vetted overlay, which is divorced from this detailed planning process, could jeopardize future federal funding for thoughtful planning efforts. We ask you to reconsider this well-intentioned but potentially damaging proposal.

In order to achieve our shared goals of higher density, higher value, pedestrian-oriented development around the Southern Green Line Metro stations, we urge you to look for incentives that are available through the County or by working more closely with GSA to bring in an office tenant. Rather than attempting to create land values and investment by fiat, we recommend a more realistic approach that is far more likely to produce results. We ask you to not adopt this resolution and to stand by the Adopted Southern Green Line Station Area Plan.

Thank you for your consideration.

Sincerely,



Cheryl Cort  
Policy Director