



September 23, 2019

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Mathew Marcou, Chair of Public Space Commission
District Department of Transportation
55 M Street SE
Washington DC 20003

Via: PublicSpace.committee@dc.gov.

Re: Public Space Construction Application #333326 by the D.C. Department of General Services (DGS) on the Eastern Market Metro Park Project (EMMPP)

Dear Mr. Marcou,

At a properly noticed special call meeting of ANC 6B on September 18, 2019, with a quorum present, the commission voted 6-0-0 to inform the Public Space Committee that it has reviewed the submission by DGS of plans for the EMMPP scheduled for consideration at the Committee's hearing on September 26, 2019 and has the following comments:

ANC 6B sent a letter on July 25 to the Committee requesting that the review of the DGS project on August 22, 2019 be postponed for one month. This request was made to provide DDOT additional time to finalize and release the Transportation Study and for DGS to provide the Commission with a Maintenance Plan that had been promised during previous public and advisory committee meetings.

Since neither of these critical documents have been provided to the ANC, the Commission nor the public has the necessary information to provide thoughtful input or an make an informed decision about the application. As such, we do not believe that this project design is ready for full review and endorsement. We base this conclusion on the following substance and context of the current project submission:

- **A Transportation Study has still not been finalized, its methodology, data and conclusions validated and publicly disseminated** to provide the context and rationale for several major changes to traffic, including slip lane closures, road direction changes, and several modifications of sidewalks and roadbeds.
- **There is still no Maintenance Plan available for review.** Residents have seen what happens to public spaces where this function is not reliably dealt with. The Commission is concerned whether the project can sustainably achieve its objectives without clear knowledge that a predictable, fully funded maintenance plan is committed to and that the plan takes account of the varied requirements of the finished parcels. To be clear, we understand the scope of such a plan to incorporate not only trash pickup, but also needs of both new and existing trees

and other landscaping in the immediate post-construction phase, as well as in the long run, maintaining playground equipment, servicing the proposed water feature as well as any planned irrigation system(s), bioretention zones, and new lighting fixtures. Just as critically, our community needs to assure itself that that plan, no matter how appropriately conceived, is executed by a partner(s) with the capacity and proven track record to reliably carry out this function.

As we noted in our letter to the Committee on July 26, this project is of the highest importance to our community. However, without the inputs noted above, any effort on our part to provide detailed review of individual components has limitations. At the same time, we wanted to share specific sectoral and output-related comments and recommendations where these are clear to us. We would note that this input is provided without critical information.

We have the following comments related to specific components of the DGS submission.

- 1) First, there are three significant opportunities which are not reflected in the current submission, and without which, the project will face limitations in achieving the goals it has set out to achieve. DGS has not asked ANC 6B to support these initiatives. But we would like to note that we are fully prepared to review any ways that the ANC can be of help in moving these opportunity areas forward to consensus and realization.
 - i) **The inclusion of a Performance Pavilion in the design of Parcel 4.** We see great promise in this idea. While it is not reflected in the schematic diagrams submitted to you, DGS, at the persistent urging of its community advisory team, is in the process of exploring a path with the CFA to activate this proposal. We endorse this effort. At the same time, we are sensitive to the legitimate noise concerns of nearby neighbors and strongly recommend that any eventual incorporation of this component include focused consultation with the most directly affected residents and businesses located in close proximity to the Metro Plaza. We also recommend that, in the design of any performance pavilion on parcel 4, strong consideration be given to a design which incorporates storage for necessary site maintenance supplies and tools as well as, possibly, some portion of the movable furniture allocated to the site. There do not appear to be any other areas on the site planned for this storage function.
 - ii) **Shifting of the set of bike lockers currently at the northwest corner of Parcel 4.** We are fully cognizant of the fact that these lockers and the land they sit on is controlled by WMATA and that DGS has made some degree of effort early in the design process to negotiate a change in their location. We need to stress that the position of these lockers represents a major impediment in successfully achieving the goals of the project to both activate the Metro Plaza as a community space and increase linkages between Eastern Market, the Plaza and Barracks Row. The cluster of lockers in their current location are both a visual obstacle to creating a unified vista as well as a practical impediment to pedestrian access from the Eastern Market area to the Metro Plaza and beyond to Barracks Row. ANC6B asks the Committee to encourage DGS to revisit these discussions and to provide its weight in support.
 - iii) **Relocating the southbound bus stop from the western side of the 400 block of 8th St SE to the edge of parcel 4 just north of the 700 block of D St SE.** Again, we are aware that DGS has reviewed this shift with both DDOT and WMATA and has concluded that the space available on the Metro Plaza bordering 8th St is too short to accommodate this proposal.

However, again, we request that this bus stop relocation be reconsidered, and all avenues be thoroughly explored to find a way to make this option viable. One of our major concerns is that the current bus stop site has problems of accessibility and is not ADA compliant. In addition, the business community have repeatedly emphasized that the transformation of the 400 block of 8th St SE, as the gateway to Barracks Row, is the linchpin of efforts, again central to this project's goals, to facilitate the seamless flow of pedestrians between the transportation hub of the Metro Plaza to the restaurants, cinema and other businesses along 8th Street.

- 2) **ANC 6B considers supplementary shade structures (trellises) to be a fundamental requirement of a successful playground design on this site.** References in the submission to “potential trellises” leave us uncertain of whether DGS views these as optional. We do not. Parents have made it clear that supplemental shade is essential for the success of the playground because of the intense heat and sun glare throughout several months of the year. Lack of supplementary shade will invariably result in a reduction of hours of intensive use of the playground facilities, undermining a core objective of the project in providing this eagerly awaited resource. We also suggest that serious consideration be given to the addition of a shade structure to provide some degree of protection for children using the adjacent splash pad. Residents have signaled their willingness to support DGS efforts, with testimony to the CFA and other bodies to make their position and its rationale clear.
- 3) **ANC 6B recommends retention of the parcel 1 splashpad in its current location.** Given the recommendation of DDOT UFD that the splash pad on parcel 1 may need to be moved to safeguard CRZ of existing trees, we need to stress that an alternate site suggested by UFD, close to the southern corner of 9th St SE and the 800 block of D St SE, raises strong concerns among neighborhood parents related to child safety stemming from the positioning of a water pad so close to a well utilized intersection.
- 4) **The reversal of direction of vehicular traffic on the 800 block of D Street is a move which has consistently been opposed by residents most directly impacted, notably residents of the block itself, but also the residents of the adjoining 300 blocks of 8th and 9th Streets, SE.**
 - a) Despite having no current, sanctioned analysis available to support this change, DGS continues to represent this street reversal in every iteration beginning with the initial plan laid in front of residents in December 2018 nearly 4 months *before* the completion of the data collection phase of the study.
 - b) DGS has been asked repeatedly to engage in a directed consultation with the most-affected residents on this block and adjoining 300 blocks of 8th and 9th Streets to listen to their concerns. DGS has categorically refused to do so, instead noting that opportunities to object will come as part of an eventual DDOT NOI and that the change could be initially implemented for a 6-month test period. Our position is that residents should be consulted in the design phase and not only provided with the option of objecting later in an NOI period after a decision is reached.
 - i) The closing of the slip lane on parcel 6 already envisaged undermines the motive for a large portion of current vehicular users of the 800 block of D. The envisaged alterations in the adjoining crosswalks similarly will remove one of the appreciable complexities affecting that intersection.

- ii) By allowing right and left turns from 8th St onto D Street, not currently possible, the reversal of the 800 block of D potentially creates as many or more pressures on the level of service on this intersection than those it might mitigate.
 - iii) **ANC 6B opposes the inclusion of the planned reversal of traffic on the 800 block of D St SE in the EMMPP submission without (a) prior access and review by the public of the vetted and sanctioned data and analysis and recommendations of the Transport Study and (b) DGS direct consultation with the most affected residents.**
- 5) **ANC 6B asks that DGS retain the current pedestrian crosswalk on 8th St SE just north of the intersection with D St SE.** Review of the presentation in the various diagrams of the submission leave us unclear. While ADA compliant ramps are clearly visible at this position on both the east and west sides of 8th St SE, there is not a crosswalk marked in a manner comparable to other crosswalks portrayed in these documents.
- 6) **ANC 6B recommends that the DGS plan install bollards bordering the proposed tabletop treatment of the roadbed of 7th St SE** between the entrance to SE Library and parcel 4 to reinforce the signaling to pedestrians that the crossing is part of an active road and to vehicles that the tabletop is a pedestrian crossing.
- a) **ANC 6B, in regard to lighting plans, recommends that DGS:**
 - i) Implement a photo metric study prior to finalizing lighting plans to verify adequacy of proposed distribution and quantity of light fixtures to achieve objectives of enhancing wayfinding and public safety throughout the project area.
 - ii) Consider additional lighting for parcels 3 and 6 which do not currently receive any new lighting and instead depend upon ambient surrounding light and one existing light pole per parcel. Addition of some light sources placed physically lower (light strips, downward facing bollard lights) on the two sites which complement the lighting schemes of parcels 1 and 4 would support the project's objective of visually and esthetically supporting the unity of the overall space of the project area.
 - iii) reevaluate the current plan to provide no lighting sources on the parcel 1 playground unless the photo metric study demonstrates that surrounding light sources adequately illuminate the playground area. Creating such a large darkened area, even if fenced, which adjacent to a frequently used sidewalk is an issue of public safety.
 - iv) Ensure that lighting poles/bollards on parcels 1 and 4 incorporate electricity outlets with sufficient power and in sufficient numbers and locations to efficiently support any needs of maintenance crews as well as strategically positioned to provide flexibility for a potential range of special event usage.
- 7) ANC 6B recommends that the provision of **access to water sources** on parcels 1 and 4 be supplemented beyond the current installation of the one water fountain on parcel 1 and one on parcel 4.
- i) Provision of a drinking water source, particularly in parcel 1, which is accessible for dogs would support the utilization of the park as a venue for residents walking dogs. Dog walking is one of the few activities which predictably will activate these spaces in the evening and

nighttime hours and make an important contribution to both perceptions and reality of public safety.

- ii) Strategic positioning of water outlets, (potentially locked when not in use) would provide backup sources for watering trees and the range of envisaged plantings, particularly during the initial post-construction phase but also as a backup watering source in the event that irrigation systems now envisaged are not eventually installed or, if in service, incur periods of disrepair.
- iii) Availability of water sources positioned to be accessible in central areas of parcel 1 and, specifically, on parcel 4, in proximity to the planned performance pavilion, would provide flexibility to accommodate the needs of a range of potential uses.

Please contact Commissioner Steve Holtzman, ANC 6B's Livable Communities Task Force Chair, at 202-489-6542 or 6B05@anc.dc.gov if you have questions or need further information.

Sincerely,



Chander Jayaraman
Chair, ANC 6B

Cc:

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Garrett Everett, Secretary of Public Space Committee
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