



# CITY OF COLLEGE PARK

## OFFICE OF THE MAYOR & CITY COUNCIL

7401 BALTIMORE AVENUE SUITE 201 COLLEGE PARK MD 20740 | COLLEGE PARKMD.GOV

January 26, 2022

### MAYOR

Patrick L. Wojahn

pwojahn@collegeparkmd.gov  
240.988.7763

### DISTRICT 1

Fazlul Kabir

fkabir@collegeparkmd.gov  
301.659.6295

Kate Kennedy

kkennedy@collegeparkmd.gov  
202.400.1501

### DISTRICT 2

Llatetra Brown Esters

lbesters@collegeparkmd.gov  
240.636.3584

Susan Whitney

swhitney@collegeparkmd.gov  
202.603.3634

### DISTRICT 3

Stuart Adams

sadams@collegeparkmd.gov  
301.364.4576

John B. Rigg

jrjrigg@collegeparkmd.gov  
443.646.3503

### DISTRICT 4

Maria E. Mackie

mmackie@collegeparkmd.gov  
240.472.0681

Denise Mitchell

dmitchell@collegeparkmd.gov  
301.852.8126

Prince George's County Council  
14741 Governor Oden Bowie Drive  
Room 2198  
Upper Marlboro, MD 20772

Via email: [clerkofthecouncil@co.pg.md.us](mailto:clerkofthecouncil@co.pg.md.us)

Re: Preliminary Adelphi Road UMGC-UMD Purple Line Station Area Sector Plan

Dear Prince George's County Council,

On January 25, 2022, the City Council of the City of College Park, Maryland voted unanimously to provide the following comments and recommendations on the subject Plan. The Council has received public testimony, written commentary, and a petition all of which included significant criticism of the Plan.

First and foremost, the City Council urges the Planning Board and District Council to defer action on the Plan. The Plan is based on a vision that is inconsistent with Plan 2035 (County General Plan), inadequately addresses environmental, transportation and public facility issues, and recommends zoning changes that are not justified. With more time, these shortcomings could be addressed through additional study and collaboration with stakeholders. Then, Plan amendments could be drafted and introduced for a second joint public hearing. While the City supports a plan to facilitate reasonable transit-oriented development in the area, it needs to be a plan that respects its unique environmental context, recognizes the benefits of the natural areas within it, and has realistic recommendations that clearly align with plan goals and countywide policies. Please consider the following information and specific requests as you deliberate on a course of action.

**Land Use Vision and Policies:** Plan 2035 establishes the framework for development countywide and sector plans are expected to conform to this guidance. Plan 2035 designated a hierarchy of places where more intensity of development is desired. The highest density development is called for in Regional Transit Centers around Metro Stations. It also names 26 Local Centers for increased development but at lower intensities. These are classified as Neighborhood, Town, or Campus Centers. The subject Purple Line station area is named UMD West Campus Center and is recommended for low to medium density, mixed-use development oriented toward supporting university research, community retail and housing needs. The Plan errs by calling for this area to be a high-intensity, mixed-use neighborhood to meet University of Maryland-related residential market demand (LU 1). It relies on a Market Study Report which covers a

much larger area (including US Route 1 where higher density residential zoning already exists and more housing can be absorbed), contains several errors and omissions, and doesn't fully examine the need for student housing especially affordable graduate student housing.

This mistaken vision leads to other inappropriate land use and zoning recommendations. The entire plan area, with a few small exceptions, is proposed for vertical mixed-use and the Local Transit-Oriented (LTO) zone (LU 1.2 and LU 1.3). The core and edge designations of this zone are not well-suited to the size or shape of the plan area. The core, where development is allowed to be 80 dwelling units per acre and up to 80 feet in height, is typically limited to a ¼ mile radius around the station. In this Plan, the core boundary extends way beyond this distance, resulting in proposed development that is unsuitable for its location. It also fails to adequately acknowledge the extensive natural resources in the plan area. There is only one land use policy that addresses the environment (LU 2). This policy preserves 3.94 acres in Reserved Open Space (ROS) which is a surprisingly small amount and the only environmentally sensitive area recommended for open space in the land use map.

Requests:

1. Change the land use vision and strategies to medium-intensity, mixed-use development along Campus Drive and lower-intensity residential development and open space for other plan areas with a priority on protecting and enhancing the existing natural environment.
2. Update the Future Land Use Map (Map 9) to align with the new vision and strategies.
3. Revise Map 6 to show existing parks and open spaces including Guilford Woods.
4. Update the Approved Development Applications in Plan Area Map (Map 7) to remove DSP-08001, Mosaic at Turtle Creek, which is no longer valid.

**Economic Prosperity**

The information provided in this section is sparse and could be enhanced by including relevant information from the Market Study Report as well as the demographics of the plan area. Tables 3 and 4 show student population and faculty and staff trends at the University of Maryland to be static or declining which contradicts conclusions elsewhere in the Plan about University-based market demand. The "Who We Are" information on page 19 is confusing as it is based on Washington Council of Government Transportation Analysis Zones (TAZ's) which are unfamiliar and go beyond the boundaries of the plan area.

Requests:

1. Add demographic and additional Market Study Report information to this chapter and provide analysis to justify plan recommendations regarding market demand.
2. Provide a map showing the TAZ's that are the basis of demographic data.
3. Provide a table showing existing demographics within the plan boundary.
4. Correct the Market Study Report as follows: Include Calvert Hills in the City of College Park (p.13); Include Attick Towers in the inventory of senior housing; Add the Aspen, Hub and Standard projects to the inventory of student housing under construction in the primary market area.
5. Include a section in the Market Study Report focused on affordable undergraduate and graduate student housing.
6. Revise Map 13 to delete the Mowatt Lane Commercial Main Street.

**Transportation and Mobility**

As this plan is prompted by the construction of a new Purple Line station on Campus Drive, it would be helpful for the plan to include proposed ridership information and design details for the station. The intersection of MD 193, Adelphi Road and Campus Drive separates the plan area and presents huge

challenges for pedestrian and bicycle connectivity and improvements will need coordination and financial commitments from the County and State. It does not appear that a transportation or traffic impact analysis was prepared, and the Plan does not demonstrate how proposed new development will impact traffic conditions. The network of proposed new streets is dependent on how development occurs and is subject to change. Proposed street UC 201, as shown, runs through an environmentally sensitive area and should be reconsidered. The recommended rights-of-way and street sections are also too large (over designed) for anticipated development.

**Requests:**

1. Revise Maps 19 and 20 to relocate street UC 201 from the Regulated Area to a location with less environmental impact and convert the portion of UC-201 south of UC-202 to a park trail and shared-use path. Add a park trail and shared-use path from the intersection of Guilford Drive and Knox Road to connect to the intersection of park trails T-202, T-203 and T-204.
2. Revise Table 7 to reclassify internal streets UC-200, UC-201 and UC-203 from Neighborhood Connector to Neighborhood Residential and add Mowatt Lane (a private road) as a separate facility from Campus Drive and classify as Neighborhood Residential.
3. Show the Mowatt Lane connection to Guilford Drive clearly on all plan maps.
4. Require all new streets to be public, not private roads.
5. Add an exhibit showing a plan and section for the proposed Purple Line stop.
6. Include a traffic impact analysis of proposed new development and other transportation modeling information about the impact of the Purple Line.

**Natural Environment**

The natural environment of the plan area is its defining characteristic. It contains woodlands, streams, steep slopes, some floodplain and known wetlands. It is County policy to preserve, enhance and restore these ecosystems yet this is where the plan recommendations fall short and why the Plan has generated so much controversy. Only 9.11 acres are within the Regulated Area of the Green Infrastructure Network and are protected through easements. A preponderance of the plan area is within the Evaluation Area (a high priority for on- site woodland and wildlife habitat conservation and restoration of lost connectivity), but it is zoned for mixed-use development. There are also 39.21 acres of total tree canopy coverage. Much of this area is known locally as Guilford Woods and has been the subject of a high-profile community campaign to protect it for its health, recreational and environmental value. The Plan says that impacts to the Evaluation Areas are unavoidable, however, the recent expiration of DSP 08001 and pause of the planned UMD/Gilbane project, offers the opportunity to reassess this position. Updated Natural Resource Inventories (NRI's) are now available for a large portion of this area and should be carefully evaluated to determine what resources are present and need protection. The extensive research and documentation of Guilford Woods by community members, scientists and environmental groups needs to be reviewed to assess the costs and benefits of urbanization of the ecological habitat of Guilford Run.

**Requests:**

1. Further evaluate the environmental envelope of the plan area to include information from updated and expanded NRI's and other documented research and include this information in the Plan.
2. Recognize the Guilford Run Watershed and opportunities in the plan area to address serious downstream flooding.
3. Investigate the discovery of a new species of carnivorous worm in Guilford Run and its relevance.
4. Determine if removal of trees in Guilford Woods will create a network gap in the Green Infrastructure Network.

5. Expand conservation areas, increase the size of the proposed Guilford Run Stream Valley Park, and modify zoning recommendations to protect these sensitive areas.
6. Require onsite preservation of trees to satisfy the Woodland and Wildlife Habitat Ordinance.

### **Public Facilities**

The adequacy of public-school facilities is a major concern and not sufficiently addressed in the Plan. Significant new residential development is proposed but an analysis of school capacity is not included. Under the proposed Transit-Oriented/Activity Center base zone recommended in the Plan, LTO, new development would be exempt from the Adequate Public Facilities (APF) Ordinance for schools.

Requests:

1. Include an APF analysis for schools in the Plan.
2. Do not exempt new development in the plan area from APF requirements. This can be accomplished by utilizing the zoning categories requested below.

### **Comprehensive Zoning (Sectional Map Amendment)**

The proposed rezoning of the plan area ignores the Plan 2035 guidance and is not sensitive to the natural environmental features in the plan area. Rethinking the zoning to reflect realistic market demands and protect natural resources is required.

Requests:

1. Rezone parcel #'s 2, 3, 4, 5, 6, 7, 8, 9, 13, 14, 17, 18, 19 and 22 to RMF-48.
2. Rezone parcel #'s 21, 23, 24, 25, 26, 27, 34 and 35 to RMF-20.
3. Rezone parcel # 29 to R-O-S.
4. Retain RSF-65 zoning on parcels # 30 & 31.

### **Other**

An element of the Plan vision is to create a landmark gateway to UMD and main street along Campus Drive. To realize this vision, it is necessary to address both sides of Campus Drive and concentrate retail in this location. The north side of Campus Drive, just south of the Purple Line alignment, includes Lot 1, a UMD surface parking lot with significant potential for infill development.

Requests:

1. Revise the plan boundary to include Lot 1 south of the Purple Line.

In conclusion, the City of College Park Mayor and Council oppose the Plan as drafted. Please give serious consideration to our request to defer action on the plan to allow for an extended time for additional analysis and deliberation.

Sincerely,



Patrick J. Wojahn  
Mayor