



December 5, 2016

Paul DesJardin
Director, Community Planning Services
Metropolitan Washington Council of Governments
777 North Capital Street, N.E.; Suite 300
Washington, DC 20002-4201

Dear Paul:

The Washington Metropolitan Area Transit Authority (Metro) applauds the General Services Administration (GSA) and the Metropolitan Washington Council of Governments (MWCOG) for working together via MWCOG's Planning Directors Technical Advisory Committee to discuss the identification of Central Business Areas (CBA) with the region's jurisdictions.

This letter summarizes Metro's comments on the factors and documentation that the region's jurisdictions will provide to the GSA on their CBA designations. Metro has also identified opportunities to provide additional information to GSA and jurisdictions for those CBAs located near Metrorail or along Metrobus corridors.

Federal workers comprise 38 percent of Metrorail ridership and 16 percent of Metrobus ridership in the AM peak period. As GSA and the federal government seek to (re)locate federal facilities, Metro wants to be a partner and ensure that the system is capable of handling the demand of new development without requiring new capital investment. Additionally, Metro seeks to increase ridership where there is excess capacity, thereby reducing the jurisdictions' operating subsidies.

In conjunction with the University of Maryland's National Center for Smart Growth,¹ Metro's Office of Planning developed a tool that predicts changes in Metrorail ridership from land use changes in the station area.² For example, for each job located within 0.375 miles of the NoMa-Gallaudet U station, 0.8 peak period trips could occur on the system. At Eisenhower Ave. station, that same job could result in 0.4 peak period trips on the system. While this model is focused on rail ridership, it also provides GSA with a lens to assess various locations if the facility highly desires proximity to public transit.

Comments on GSA's Four Factor Determination

Below are comments on the draft Four Factor Determination circulated to the Planning Directors on November 3, 2016.

- In 2(b)(i), planned and funded should also include an expected year of completion such that GSA can assess whether the option will actually be available when the facility is located.

1 <http://planitmetro.com/2015/08/24/ask-the-professors-how-local-land-use-decisions-impact-metrorail-ridership/>

2 <http://planitmetro.com/wp-content/uploads/2015/04/Wmata-Land-Use-Ridership-model-summary-Report-v2.pdf>

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- In 2(b)(i), Capital Bikeshare facilities should be identified separately from bicycle facilities.
- In 2(b)(ii), service levels should provide peak and off-peak frequencies and an estimate of the mode's capacity. The type of work and transportation needs at a location may vary dramatically between the region's peak and off-peak hours and the capacity needed to transport the workforce.
- In 2(b)(i) and (ii), regional bus service and local bus service should be defined such that all jurisdictions are providing comparable information. An option would be to use WMATA's definition for regional service as follows:
 - Crosses jurisdictional boundary (city, county, or state) by at least one-half a mile in each and allows boarding and alighting in both jurisdictions over a portion of the line; or
 - Meets two of the following:
 - Operates for a considerable distance on an arterial street with a majority of riders boarding/alighting on arterials;
 - Serves one or more MWCOG regional activity centers; or
 - Achieves cost efficiency by serving 30 or more passengers per platform hour.

Metro Support Once Jurisdictions Have Identified CBAs

As noted above, Metro's Office of Planning has a number of analytical tools that either the Metro or COG staff can utilize to enhance the information provided to GSA in support of their location selection decisions. As these are location specific, they can be applied only after the jurisdictions have identified the CBAs.

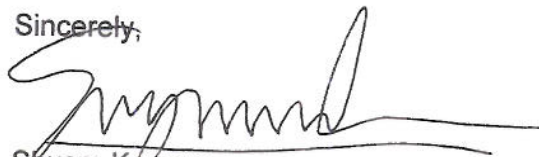
Specifically:

- Identification of Metro stations that may/may not be able to absorb additional office development based on their current utilization and capacity. Some stations, especially transfer stations and those in the core, operate at or above capacity during peak periods in terms of elevators, escalators, platforms, and/or fare gates. Adding more customers to these stations risks exacerbating service reliability and customer safety and may require additional capital investment by the jurisdictions.
- Impact of a location decision on the jurisdictional operating subsidy, based on the potential additional ridership.
- Parking availability by station.

- Number and demographics of households accessible from a specific Metro station or from a specific Metrobus stop within 30- or 45-minutes.

We look forward to continuing to work with the MWCOG's Planning Directors Technical Advisory Committee, our jurisdictional partners, and GSA to help ensure that location decisions encourage public transit use.

Sincerely,



Shyam Kannan
Managing Director
Office of Planning

CC: Chuck Bean, Executive Director, MWCOG
Tony Costa, Senior Advisor to the Administrator, GSA

