

***Residential Wayne Ave Group for Purple Line Design***

*That includes:*

*Seven Oaks Evanswood Citizens' Association  
Park Hills Civic Association  
East Silver Spring Citizens Association  
Sligo Branview Community Association  
(Signators listed at conclusion of letter)  
Contact via AnneMEwards@Gmail.com*

7 March 2014

*Ms Françoise Carrier  
Planning Board Chair  
Maryland-National Capital Parks and Planning Commission  
Via email: mcp-chair@mncppc-mc.org*

Dear Ms Carrier,

We write to ask urgently that the upcoming Mandatory Referral include protections from specific Purple Line plans that must be improved before they are contracted or they will do serious injury to our neighborhoods and home values along the Wayne Avenue corridor.

We write as the "Residential Wayne Avenue Group for Purple Line Design", a co-operative of four large residential groups that blanket Wayne and its environs from downtown Silver Spring to Long Branch.

Most of the problems we present in this letter have become publicly known only within the last year. Some were not clear even when we filed our FEIS comments last autumn. Because of the short time since these problems have become apparent, and because decisions will be forced by the rapidly approaching P3 contracting, we need the help of the Planning Board.

We have been faithful to the Purple Line's "public input" process but, these new discoveries and deadlines mean citizens can no longer do this alone. We are committed to resolving issues by mutual agreement. We cannot have decisions made by default in this pressured time, nor subject to the different priorities of a for-profit corporation.

And we find ourselves colliding with builders of the Purple Line on core values. That is no reflection on them or their intentions or their performance. But it is a fact that there are things they think we should live with, that we simply cannot.

For the purpose of this urgent time-sensitive request, we are limiting this list to the Purple Line issues most critical to us that directly involve construction and therefore, P3 contracting.

We ask you, please, to secure these points for us as part of the County's Memorandum of Agreement with Maryland for Purple Line construction.

Please contact us for any additional documentation or information.

- I. **DOUBLE DOWN ON EFFORTS BY OFFICIALS TO RELOCATE WAYNE AVE SUBSTATION**
- II. **REQUIRE HUMAN-SCALE HEIGHTS ON RETAINING WALLS**
- III. **REQUIRE TOUGH NOISE STANDARDS NEAR BEDROOMS**
- IV. **REQUIRE TOUGH VIBRATION STANDARDS FOR ABUTTING STRUCTURES**
- V. **REQUIRE MINIMUMS ON QUALITY OF MATERIALS AND CITIZEN APPROVAL ON APPEARANCE OF ALL PERMANENT STRUCTURES**
- VI. **REVIEW BUS/TRAIN/CAR INTERFACE PLANS TO AVOID BOTTLENECKS (additional submission included from the Sligo/Branview Community Association)**
- VII. **PUT CITIZENS AT THE TABLE FROM HERE FORWARD**

**I. DOUBLE DOWN ON EFFORTS TO RELOCATE THE Power Substation for the “Wayne-mile” to a new, more acceptable location**

We want Purple Line to put the two megawatt electrical power substation it certainly needs somewhere else along Wayne Avenue in a more appropriate location than Cloverfield at Wayne.

That location is in full view of dozens of stand-alone homes and a structure there would block the light and sight of the residence of 200 seniors within 40 feet of that location.

**FACT:** A mechanical installation larger than any nearby home, no matter how it is disguised, will lower the values of the properties within sight of it.

**FACT:** A large unoccupied building is dangerous anywhere as a magnet for CRIME.

**FACT:** There are alternative locations which can successfully host the substation if there is greater official determination to make one of them work.

The area voted this plan unacceptable as soon as it became public last spring and residents went to work with the Purple Line to look for a better plan. It is important to note that we have been scrambling on this issue because NO ONE knew about this location or size of the installation until mid-April of 2013:

**Not one** adjacent stakeholder, including the seniors’ residence, was ever contacted or informed;

**Not one** officer of either of the large adjacent civics was ever informed, and we checked back through five years of officers and those who handled PL issues;

**Valerie Ervin**, Montgomery County Councilwoman and PL supporter for ten years turned to PL officials at a public forum on June 19, 2013, and said, **“Why didn’t I know about this?”**

We approached Purple Line immediately in April of 2013 for relief and were as positive as we could be. We made suggestions to PL for viable alternative locations and begged PL to give us an idea of its own.

We asked PL, and PL committed, not to respond just “yes” or “no”, but to give us the details if they didn’t like an idea in the event that the citizens’ political will or rigorous cooperation among county agencies would make the difference in making another site “work”. We don’t have that yet.

Since April of 2013, PL has been very clear that its “preference” remains its first location. They have met with us only twice. Each time, they offered slim returns on the inquiries and sought to move immediately into a collaborative design phase for the original location.

It is March of 2014 and we still have not received detailed analyses on the locations we suggested starting last April. And PL has never made a single suggestion of its own for an alternative location.

With no judgment passed herein at all on Purple Line’s intentions or operations, we would not be coming to you if it had been demonstrated that officials had really tried to move this thing. The burden to find an alternative cannot be carried by citizens alone.

Growing numbers of residents want the substation moved to a more suitable place. They believe that our government and its officials, and such good engineers, should be able to make an alternative work.

***SUBSTATION ALTERNATIVES:*** The following summarize the suggestions we have given to PL for alternatives starting last April. We have been clear that we are wide open to a better idea.

**1. Bury the substation and put a park on top. This is a major commitment of money and skill but it preserves the area for other uses and removes the blight and crime magnet.**

Precedents exist for this in the US and in Europe. MTA/PL reported back in Jan 2014 that this option did not work (A) in one location because of lack of access space or (B) because another county agency would not to redraw some of its own plans or (C) in some locations because of “water table” issues, which the residents countered that MTA/PL would have to conquer elsewhere when it builds tunnels for other neighborhoods.

**2. Possible sites that residents have identified to Purple Line**

- a) Property for sale in much less visible location, with few nearby homes, on Wayne (new idea, new on market, winter 2014)
- b) Property for sale on Dale within stone’s throw of Wayne (new idea, new on market, winter 2014)
- c) Properties off Dale adjacent to county’s school property (identified April 2013)
- d) On county property on the south slope just east of the original Blair HS Bldg (Jan 2014) with full access from Wayne Avenue and nearer to the Dale Drive station
- e) Under the school parking lot at Wayne and Dale, which has to be rebuilt anyway, coordinating a redesign of the school’s west entrance to fit the new arrangement (April 2013)

f) The edges of Silver Spring International Middle School which PL has told us are “park” land and therefore “not possible” (?)

g) The Whole Foods Parking Lot (April 2013)

*A substation can be “built in place” with full access on the lot surface.*

h) Inside the open air County Parking Garages (April 2013)

Inside the open air Wayne and Fenton garage,

Inside the open air Bonifant and Dixon garage

*A substation can be “built in place” with full access inside the garage*

*You would lose maybe 10-20 parking spaces – that’s all -- which is way smaller economically than the sum total of devaluation to dozens of homes – a number of which are in the economic justice area south of Wayne*

**3. If any alternative location is “too far east”, then offset it by adding a substation to the west**

We completely understand that substations need to be “about a mile apart” but PL mentioned recently that one of the above locations was tenable as an alternative, but “too far east”.

If a location is “too far east”, then we have suggested that PL should ADD a substation to the west in any of the multiple county properties in downtown Silver Spring which would then allow PL to reposition Wayne Ave substations comfortably.

We had already suggested this formula to PL in April 2013, adding another substation to the total to create more options, but we have had no response specifically about this idea.

*We hold that “another” substation at (roughly, average) \$1.2 million per copy is still less expensive than the aggregate of damage to our home values if the substation stays where PL wants it.*

**II. REQUIRE HUMAN SCALE HEIGHTS ON RETAINING WALLS**

The new concern: We were shocked to learn only in late January 2014 that PL plans on building retaining walls along a great deal of residential Wayne Avenue, some as high as 13 feet.

Wayne Avenue is now street level gardens and lawns. We certainly understand what “soil retention” is but we ask the Planning Board to create numerical limits, parameters, some standards, so that Wayne Avenue does not end up a de facto concrete canyon.

This is a new and very urgent issue for the community. PL’s own engineering drawings released in Sept 2013 indicate retaining walls but the residents have not had specific information as PL is still developing its own plans.

*We ask the planning board to require re retaining walls that:*

- Retaining walls are employed only as a last resort, only when all other landscaping options have been exhausted
- No retaining wall obscures the view of pedestrians or prevents a pedestrian's ability to get off the sidewalk
  - Safety is achieved when pedestrians can be seen clearly as they walk by.
  - Safety includes the ability to leap away from a rogue vehicle and the landscaping must provide that for everyone, especially, children.
- All designs and materials for retaining walls should be subject to prior approval of civic associations and adjacent stakeholders
- The Planning Board should require PL to set clear minimums for the quality of materials for retaining walls so a P3 concessionaire does not try to save itself money there later on

### **III. REQUIRE VERY TOUGH NOISE STANDARDS NEAR BEDROOMS**

Wayne Avenue is much quieter than officials have told us that they think it is, period. In this very low density residential area, it is likely that the train will be the ONLY sound in the off-peak hours.

We will not in this letter argue how PL determined its "averages" for its noise making. We will not in this letter discuss the merits of what Federal guidelines permit with their "averages".

Nor would we expect PL to keep it as "quiet" on big busy Georgia Avenue or any other main arteries with a lot of all-night traffic noise. But Wayne goes silent at night.

**We ask the county and state to set a very tough standard for PL operational sound levels in off peak hours under bedroom windows in very specific quieter areas.**

*We also ask the Planning Board to require that Purple Line spell out what special steps it will take to mitigate all of its operational noise on Wayne Avenue.*

All planners, PL, State and County, already know that where vehicles share lanes with trains, most standard noise mitigation measures can't be used because of their adverse impact on the other vehicles.

We also know that "sharing lanes" is a very limited practice for light rail around the United States (it is arguably in single digit percentage of all light rail miles that share lanes) and very few mitigation measures even exist for that situation.

**So we ask the Planning Board to require PL publicize exactly what mitigation requirements it will make of the P3 concessionaire**

#### **IV. REQUIRE TOUGH VIBRATION STANDARDS FOR ABUTTING STRUCTURES**

On the same reasoning, for very specific and localized areas, we ask that the Planning Board require a very tough standard for operational vibration.

There are some locations, e.g., in downtown Silver Spring where – even according to PL’s public engineering drawings – a human can touch the wall of a structure with one hand and touch a passing train with the other. It is that close.

We ask the Planning Board to identify these very specific areas where operational vibrations will inarguably affect the structure and the life going on within the structure.

**And we ask the Planning Board to set a tough standard for vibration limits for these specific areas. State of the art vibration mitigation measures do exist.**

#### **V. REQUIRE MINIMUMS ON QUALITY OF MATERIALS FOR PL PERMANENT INSTALLATIONS AND REQUIRE CITIZEN APPROVAL ON THEIR APPEARANCE**

- a. *We ask the Planning Board to take whatever steps are needed to guarantee for the residents that a P3 partner can’t decide later to save money by using cheap materials for its permanent installations.*

We are asking that the Planning Board set some minimums, measurable quantifiable standards, whatever it thinks will work, to guarantee a high quality of materials will be used

Permanent installation involves everything that will be left to live in our neighborhoods: The track bed, retaining walls, landscaping, catenary poles, wires, even whether the concessionaire will rent out space on the poles for advertising

We ask the Planning Board to please set some protections in place for the moment down the road when a concessionaire wants to improve its profit margin.

There has been a lot of verbal assurance, and it is sincere, that state officials would “not let that happen” and material quality will be high. We do not doubt their sincerity, but we respectfully submit that our home values are on the line here, and we need more than a verbal assurance.

- (b) We ask the Planning Board to make sure there is a guarantee that citizens and/or their civic associations will have real approval authority – not just window dressing “input” -- on the appearance of any permanent infrastructure the purple line intends to leave in their neighborhoods.*

As this process has accelerated in the last year, more and more decisions are coming back as “done deals” or just as surprises. We need a protected process that we will be consulted in advance.

- (c) The Planning Board should require on our behalf that public drawings of PL plans are updated in a timely fashion and on a regular basis.*

Citizens cannot always interpret engineering drawings and should not be expected to do so. For the sake of the public, there should be understandable renderings, updated on a regular schedule, that show us what the latest plan is, pole by pole, for our neighborhoods.

#### **VI. REQUIRE A REVIEW OF BUS/TRAIN/CAR INTERFACE THAT AFFECTS PL CONSTRUCTION**

There is concern among some residents who are seeing potential bottlenecks emerge at specific points on Wayne Avenue. These have been identified as PL plans have matured. What they see would affect PL's construction plans at very localized points.

These observations are offered as an aid to planners because these residents know their areas intimately and might see things that a planner could not.

This is of particular concern to the Sligo Branview Community Association, a signator to this letter, which is adding its own letter to elaborate on traffic flow. The Sligo Branview elaboration is included with this letter and follows the list of signators.

#### **VII. REQUIRE A CITIZEN SEAT AT THE TABLE FROM HERE FORWARD**

*We ask the Planning Board to require a process that puts citizens at the table in a more formal role from now on regarding the Purple Line.*

We need a more structured process, for more than just "input", for a public works project of this scope and magnitude, whose consequences land squarely on us in these neighborhoods.

Over the decade, there have been many meetings but not an equal return in progress, on the issues that concern us most.

Citizens have struggled since the beginning to form themselves into every fashion of group, coalition, committee and association to give stakeholders the impact on PL decisions that they deserve.

But this process has accelerated in the last year and so have the number of surprises, and the number of decisions that come back as "done deals" *even when no one intended that to happen.*

This is not about "trusting" or "doubting" the credentials or intentions of any of the professionals involved in this process. But citizens can no longer work essentially by proxy, only in indirect fashion, when so much for them personally is at stake.

*We ask the Planning Board to require that citizens and/or their civic associations will have a structured role for substantive inclusion on PL decisions that directly affect their lives and have that role from here forward, through contracting, planning, construction and early operations.*

**CONCLUSION**

Our members intend to testify at the March 20, 2014 session of the Planning Board addressing the Mandatory Referral for the Purple Line. This letter is sent now, in early March in hopes that it can inform any internal deliberations by the Planning Department in the interim.

This is respectfully submitted by all the members of the Residential Wayne Avenue Group for Purple Line design (listed below) all of whom are copied on the email transmission to Ms. Carrier.

As scribe I remain at your service, and theirs, and I can be reached at the contacts listed below and provide contact information for all of the others.

Sincerely,

Anne M. Edwards, Residential Wayne Ave Group for PL Design  
Email: [AnneMEdwards@Gmail.com](mailto:AnneMEdwards@Gmail.com)  
Tel: 301 565 3101

***SIGNATORS***

***Seven Oaks Evanswood Citizens' Association***

Jean Cavanaugh, President  
Tom Armstrong, Secretary  
Anne Edwards, member  
Erin Johansson, member

***Park Hills Civic Association***

Alan Bowser, President  
Chris Richardson, Vice President

***East Silver Spring Citizens Association***

Karen Roper, Chair of ESSCA Purple Line and Land Use

***Sligo Branview Community Association***

William R. Mentzer, Jr. President  
Jonathan D. Halpern, PL Issues Coordinator

***CC at the Montgomery County Planning Department via email:***

Gwen Wright, Director of Planning  
Tom Autrey, Functional Planning and Policy  
David Anspacher, Functional Planning and Policy  
Robert Kronenberg, Chief, Area 1

**ADDITIONAL SUBMISSION BY SLIGO BRANVIEW COMMUNITY ASSOCIATION**

**7 March 2014**

**SBCA Inputs for Purple Line Action**

The SBCA neighborhood is just east of the Park Hills and Seven Oaks-Evanswood communities along Wayne Ave. The proposed alignment for the Purple Line (PL) passes through or in close proximity to our neighborhood, at grade, in mixed traffic and through a tunnel, with 3 stations (Manchester Place, Long Branch, and Piney Branch) in our immediate vicinity. Residents and businesses in our neighborhood will be directly impacted not only during the construction phase but as the completed line operates.

The SBCA and its members are sharing our strong concerns with you on these matters to ensure the PL fits well with our neighborhoods which it is ostensibly meant to serve. We are aware that some of the changes we are insisting on will cost money. However, the amounts in questions are modest relative to the costly changes recently incorporated into the PL design to mitigate negative impacts in neighborhoods at the western end of the PL. The residents of our area merit the same consideration. As taxpayers and future riders who will use and pay for this important project, our concerns are valid and our proposals for modification should be acted upon by the MTA and by the relevant MoCo agencies.

**1. Traffic Management**

The PL will be at grade, in mixed traffic along Wayne Ave., along Arliss St., Piney Branch Rd., and University Blvd. The major intersections along this route are already heavily congested at peak hours and are failing. MTA's own traffic forecasts for the Purple Line, envision worsening congestion over the next two decades. Time savings attributed to the PL between for travel between Dale Drive and Langley Park are at odds with those traffic forecasts, (peak hour PL trip times of less than 12 min. vs present bus times of over 20 min.). The FEIS documents and discussions with MTA and MoCo representatives present woefully insufficient measures along this route to offset the congestion impacts that the PL will exacerbate, especially at peak hours, since the PL travels in mixed traffic in this area. Changes are called for regarding:

- **Roadway widening near congested intersections**
- **Changes to bus routes/schedules on congested roadways**
- **Traffic calming on side streets.**

Changes to the roadway along Wayne Ave. and Arliss St. to reduce congestion shown in the FEIS documents, are partial and incomplete, largely comprised of right turn lanes added to a couple of intersections. Road widening to permit right and left turn lanes in addition to through lanes should be instituted at Wayne Ave./Sligo Creek Pkwy., in both directions, at Wayne Ave. and Manchester Rd., and at Arliss St./Piney Branch Rd. Bus routes and schedules also need to be reworked significantly. Six lines currently run along the most congested parts of Wayne Ave. and stop all along the street, especially at the choke point between Manchester Rd. and Sligo Creek Pkwy. The FEIS has only a single change in routes/schedules (J4 metro bus) leaving the PL to compete with all of the remaining lines for road space and headway through our community. Buses should be rerouted off of critical stretches of Wayne Ave. and Flower

Ave. and/or their schedules reduced, not increased during peak hours. The location of bus stops also needs to be changed significantly to accommodate the PL. Wayne Ave. between Sligo Creek Pkwy. and the PL tunnel should be free of bus stops. Those stops should be moved to other streets (route changes) or further east on Wayne Ave. (above Manchester Pl.) and west on Wayne Ave. (west of Sligo Creek Pkwy.).

The present congestion along Wayne Ave., Flower Ave. and Piney Branch Rd. at peak hours has given rise to growing “cut through” traffic on residential side streets (Eton Rd., Bradford Rd. - east and west of Wayne Ave., Plymouth St., Manchester Rd. - east and west of Wayne Ave., Manchester Pl. and Walden Rd.). These streets are narrow and cannot accommodate vehicles traveling at even moderate speeds to skirt traffic on the main roads. Traffic calming measures are called for, whether in the form of “right turn only” off of the main roadway at peak hours, speed bumps or similar measures. None of these appear to have been considered in the FEIS but must be in order for our neighborhood roads to remain just that, residential side streets.

## **2. Pedestrian Access and Safety**

The drawings in the FEIS are not particularly informative about pedestrian access along the PL route and in and around the Manchester Place station. Where the PL crosses pedestrian crosswalks, either signals or “must stop” signage should be used. For the Manchester Place station, complete ADA compliant sidewalks on both sides of the station and to the entrances must be provided. FEIS drawings indicate pedestrians on Wayne Ave. cannot access the Manchester Place station directly from Wayne Ave which will seriously impact access to the station by the majority of potential users of that station, i.e., people residing in the multi-unit garden and high-rise apartments as well as single family homes on the north side of Wayne Ave. Moreover, quality and placement of lighting, stairways and elevators are not described but are of great concern to the community. Safety is also a major concern: the drawings indicate no barriers to entering the tunnel from Wayne Ave. nor from Arliss St. The FEIS contains no analysis of maximum safe train speeds in mixed traffic in hilly, residential neighborhoods such as those along Wayne Ave., nor of incident management in the event of sudden braking to avoid collision with pedestrians or cyclists crossing in its path. More effort should be spent on these access and safety issues than on amenities.

## **3. Residential Parking**

There are two parking issues for SBCA. The first issue is that according to the FEIS, no parking facilities are to be provided at the three PL stations. The assumption is that all riders will walk or take buses to these stations, at all times of year, regardless of weather, distance or ambulatory ability. Many civic associations are skeptical of this assumption. Many potential PL users have explicitly indicated they would drive to a station and try to park on the side streets. The side streets in the SBCA neighborhood tend to be quite narrow, indeed narrower than those found elsewhere in East Silver Spring and are too narrow to accommodate parking on both sides and still permit safe passage of vehicles traveling in two directions.

At present, there are no parking restrictions on any side streets off of Wayne Ave., Flower Ave., Arliss St. or Piney Branch Rd. For streets within 5 blocks of the Manchester Place stations (Eton Rd., Bradford Rd., Plymouth St., Reading Rd., Manchester Pl.), the county should institute permit parking for residents of those streets. For the Long Branch Station on Arliss St., permit

parking should be instituted on Walden Rd., Garland Ave., and Plymouth St. Moreover, the county should provide public parking close to the Long Branch Station.

The second issue is that construction of the PL will eliminate all parking on Arliss St. removing 16 street parking places now used by residents of the 16 townhouses. The existing parking lot on the townhouse property has 20 spaces, but a minimum of 32 spaces are required by residents. A new parking lot for at least 12 spaces is needed and can be constructed on the property at the corner of Flower Ave. and Arliss St. that is being taken for the tunnel construction.

#### **4. TPSS Station-Arliss**

The FEIS proposes a Traction Power Substation (TPSS) on the north side of Arliss St. and Flower Ave. on the property taken for the tunnel construction operation. This places the TPSS in a highly visible location close to both detached homes and townhouses. This TPSS should be placed under ground as part of the Wayne-Arliss tunnel project. This end of the tunnel is to be built by the open trenching method, and adding an extra room, adjacent to the tunnel, for the TPSS should not be difficult. Access to that TPSS can be made easier than with a “House” type structure, and the environmental protection issues can be addressed as part of the similar type of work needed to protect the other system equipment in the tunnel. This type of TPSS can be buried, as has been done in other US localities (eg Anaheim CA). The planned above ground placement of the TPSS, which will produce a constant hum 24/7, would position it 80 ft. from the nearest townhouse, 90 ft. from the house at Flower Ave. and Plymouth St., and 95 ft. from the house on Sudbury Road.

#### **5. Noise and Vibration**

The FEIS notes but does not adequately address noise produced by the PL trains: wheel squeal, warning bells, and horns. The PL train will pass 100s of residencies in our neighborhood. As it does, it will generate noise from wheel squeal (especially at turning points of which there are several in our area), by sounding warning bells at all manner of crossings, and blowing horns. The abatement methods suggested in the FEIS (train skirts) are inadequate and sound barriers are ineffective in mixed traffic. Experience from other Light Rail Transit (LRT) systems in the US indicates more effective methods including continuous track lubrication to deal with wheel squeal. Other means need to be identified for reducing the decibel level of warning bells and horns. Much more needs to be done to address these matters to comply fully with County standards on acceptable noise levels.

Vibration effects from the movement of the PL train along the tracks can pose a problem to adjacent structures depending on the nature of the track bed relative to the surrounding earth. There are several locations in the SBCA neighborhood where the PL tracks are relatively close to townhouses and apartments. Extra care needs to be taken in track bed design for these specific locations.

The places where it is most important that noise and vibration abatement measures be taken are:

- the Wayne Ave. apartments on either side of the Manchester Place Station, where both of these apartment buildings are within 20 ft. of the closest track

- the Arliss St. townhouses, where the upper set of 8 townhouses is 80 ft. from closest track and the lower set of 8 varies from 80 to 90 ft. away
- the Flower Branch Apartments, where three apartment buildings along Arliss St. are within 80 to 90 ft. of the closest track
- the Goodacre Apartments, where four apartment buildings along Piney Branch Road are within 50 ft. of the closest track
- the Foxhall Apartments, where three apartment buildings along Piney Branch Road are within 50 ft. of the closest track and on the University Boulevard side, two apartment buildings within 70 ft. and two within 80 ft. of the closest track

#### **6. Citizen Involvement in the Design, Construction, and Operation of the PL**

SBCA residents compiled the following comments and concerns which we expect not only the Maryland Transit Administration (MTA) but also Montgomery County (MoCo) agencies and our representatives at the state and local levels to take action on, making appropriate adjustments to the preliminary plans and then continuing to work with SBCA to mitigate those issues as the design and construction processes move forward. We believe that there is a need for the establishment of a formal process by which the MTA and the PL developer/builder work with affected communities and document the decisions made on each issue for the record.

Submitted by William R. Mentzer, Jr.  
President of Sligo Branview Community Association  
7 March 2014